

Makarow, Irina (ECY)

From: Noel Allen <Noel.Allen.391695502@p2a.co>
Sent: Thursday, November 19, 2020 11:59 AM
To: ECY RE CHEM ACTION PLANS (HWTR)
Subject: Comments on Draft Per- and Polyfluoroalkyl Substances Chemical Action Plan

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Dear Irina Makarow,

To the Department of Ecology and Health: I live with a condition called chemical sensitivity, and can easily have seizures from airborne man-made chemicals. In my own house I spare no effort to eliminate chemicals so I can maintain a baseline of health, which makes it extremely difficult and sometimes impossible to buy new things (furniture, clothes, shoes, coats, etc) or my fiance and I hang up new items outside for weeks until the chemical impact has lessened enough that I can bring them into the house. It is a constant battle.

Meanwhile, it almost impossible for me to go into buildings that are not my own house. Due to the pervasive chemicals in cleaning products, furniture finishes, carpets, textiles, etc, a person using a wheelchair has better access to the world outside their home than a person with chemical sensitivity. Most of us live lives of forced seclusion due to this condition, is not our fault but caused by the relentless chemical industry.

Although I support environmental causes, my health condition is not a choice or a hobby for me. It is a health condition that often leaves me in bed for days as I recover from seizures. People around me often ask me what I am reacting to. Sometimes it is clearly a cleaning product I was exposed to, but usually all I can say is I don't know. There are too many chemicals in our environment for me to control them all. Before the pandemic started, I had reached the point of turning down most social invitations because of this and jobs outside my house or closely interacting with others was becoming impossible for me.

Please do all you can to limit harmful chemicals in our lives.

Thank you,

Noel

(Below is the form letter suggested by the Washington Environmental Council)

Thank you for your hard work on developing the PFAS Chemical Action Plan (CAP). The CAP is the blueprint we need to address contamination and prevent new PFAS pollution in our state. It represents a significant opportunity for Washington to demonstrate leadership and create a model for other states and the nation, as Washington has done on challenging toxic pollution issues for more than a decade.

I applaud the state for many of the actions in the plan, however, I believe the CAP falls short in its recommendations, particularly when it comes to using existing regulatory authority, setting timelines and aggressively investing in solutions. The CAP must be strengthened to protect the health of our communities and the environment.

In particular, the CAP should include the following recommendations:

- Ban non-essential uses of PFAS beginning in 2025. The CAP identifies carpet, residential upholstery, apparel, cleaning agents, floor waxes and stone/wood sealants, and waterproofing agents/aftermarket treatments as significant sources of PFAS in the home. Currently, the recommendation delays action on many non-essential products despite significant evidence that they are important sources of exposure. We must act swiftly to reduce the impacts of PFAS now.
- Immediately designate PFAS as hazardous substances under the Model Toxics Control Act and adopt cleanup standards for all PFAS in 2021. Neither state nor federal law recognizes PFAS as hazardous substances despite the significant drinking water contamination and known health effects of PFAS. This is a critical step to ensure polluters pay to clean up contamination and drinking water in communities.
- Pursue immediate testing of sludge and develop a sludge (biosolids) standard for all PFAS. Sewage sludge (biosolids) should be tested for PFAS chemicals, beginning with sludge applied to dairy and other farms in our state. Alternative disposal methods should be investigated to keep PFAS off farms and other lands. This action is vital to prevent continual recontamination of our food and bodies with PFAS.
- Adopt strong drinking water standards in 2021 for all PFAS. The Department of Health is currently in the process of establishing standards for PFAS in drinking water, which are set to be finalized in 2021. Setting standards for all PFAS is the only way to ensure that Washingtonians have access to safe drinking water.

I ask that you take bold action to ban, regulate, and cleanup PFAS contamination in our state. These dangerous and forever chemicals don't belong in our homes or our drinking water.

Regards,
Noel Allen
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