

Makarow, Irina (ECY)

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Sent: Saturday, December 5, 2020 5:18 PM
To: ECY RE CHEM ACTION PLANS (HWTR); Makarow, Irina (ECY)
Subject: Be Heard - PFAS Contamination
Attachments: PFAS-Contamination-on-Whidbey-Island.pdf

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Comments on State PFAS Draft Chemical Action Plan

Richard Abraham, December 5, 2020

Richard Abraham (Richardabrahamconsulting.com): Worked to investigate PFAS contamination in several states going back to the mid-1990s. That work involved environmental testing and interfacing with communities and regulatory officials. More recent PFAS investigations involved Navy's ongoing PFAS releases on Whidbey Island and on-going releases of GenX from the manufacturing plant in North Carolina.

The attached report, '[The Navy's PFAS Contamination on Whidbey Island](#)' is made part of these comments. It supports the need to strengthen the Draft Plan and the role of our state agencies. All that was done in the way of withholding information from the public, downplaying the seriousness of the problem, and unnecessarily prolonging exposures to schoolchildren, hospital patients, and the general public took place under the not so watchful eye of the WA Departments of Ecology and Health.

The Draft Plan Says: Ecology/Health will investigate PFAS contamination in groundwater and surface water in support of local health departments, cities, counties, and other public entities ...

COMMENT: Ecology should conduct investigations with or without the support local health departments, cities, or counties. If there is credible evidence of a problem, including but not limited to test results provided by citizens. Many public officials would rather ignore or downplay a toxic pollution problem. They are reluctant to challenge politically powerful polluters and fear adverse economic impacts such as loss of tourism and decline in property values. They find it easier to keep a problem that is out of sight, out of mind.

COMMENT: Health and Ecology should not be party to the downplaying a problem that local public officials want kept out of the news. Polluters should not be turned loose to investigate themselves with minimum agency oversight. History demonstrates that the more powerful and influential the polluter, the less meaningful regulatory oversight there has been. History tells us that polluter led investigations often serve to cover up a problem and pass costs on to taxpayers.

The Draft Plan Says: Without identified funding, public water systems and their ratepayers must absorb expensive response costs.

COMMENT: The public does not have to and should not have to absorb these costs when responsible parties can be identified. Existing laws allow for responsible parties to be held accountable – much like

tobacco and drug companies are now being held accountable. What is needed is for our public officials to exercise the political will to do so.

The Draft Plan Says: "Replacement products are still poorly understood." This seems to suggest we need to understand more before we can take needed action with regard to these pollutants.

COMMENT: If these PFASs are poorly understood, why are they being manufactured and released? In fact, they are understood enough to know that they are harmful - or that they increase risks of harms. The Draft Plan should be aimed more at keeping them out of people and the environment and less on expensive studies that are too often used as an excuse *not* to take timely action.

The Draft Plan Says: Health (Dept) should continue to find opportunities for Washington residents to participate in exposure and health studies.

COMMENT: Washington residents should have the opportunity to participate in those studies even when local public officials don't want studies done.

COMMENT: The Draft Plan does not adequately address the need for more thorough investigations and environmental testing that will identify PFASs at lowest possible detection limits. Such testing should be required for public drinking water sources with results being re made public. Doing so would allow members of the public to take actions to protect themselves; it would allow for the monitoring of increases; and it could assist in identifying contamination sources.

The practice of not looking for PFAS at levels that can be found allows for continued exposures and serves to shield responsible parties from being held accountable.