



Washington Association of Sewer & Water Districts

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January 5, 2021

Irina Makarow
Department of Ecology
Hazardous Waste and Toxics Reduction Program
PO Box 47600
Olympia, WA 98504

RE: Draft PFAS Chemical Action Plan

Dear Ms Makarow:

We would like to extend our appreciation to staff and the advisory committee for the quantity and quality of work that has gone into the development of this document, which will serve as an action template to address the control and clean-up of Per- and Polyfluoroalkyl Substances (PFAS).

The Washington Association of Sewer & Water Districts represents more than 180 public sewer and water districts in the state, serving nearly 25% of our state's population. These districts provide cost-effective sewer and water services—ranging from the state's largest population centers, to the smallest rural communities. Clean water is a major concern to both our membership and the clients they serve. The potential for contamination is always a concern, especially since, beyond our wellheads and collection points, we have no control over what is sprayed, injected, discharged or built near our facilities. The situation with PFAS over the entire country is especially alarming given the longevity and ease of travel of these compounds.

As we have stated in comments on the interim Chemical Action Plan (CAP), funding to address PFAS contamination of drinking water sources is of great concern to us. The CAP describes some of the money being used to assist Sammamish Plateau Water, but also makes it evident that their rate payers are going to be paying much more for a problem not of their making. Areas with a sole source for water supply will not necessarily have the option of switching to different water sources if their source is contaminated, meaning that expensive treatment may be their only option. It will be vitally important for the state to make robust funding available, particularly in the form of grants, to ensure communities faced with cleanup of PFAS contamination continue to have access to safe drinking water without being burdened by costs to address a problem thrust upon them.

A number of our districts are also eager to see Ecology develop clean up levels for PFAS contamination. Having these levels established creates a clear path for access to Model Toxics Cleanup Act (MTCA) remediation funding. We support action that allows our member districts to plan for cleanup with some certainty.

The CAP outlines extensive needs and plans for studies on a broad range of PFAS issues. We support the work being done to find alternative food packaging and other remedies for routine household exposure. We recognize the lack of methodology for extracting PFAS from the biosolids matrix to develop an accurate range of values in biosolids applied to land, and support efforts to improve these techniques. We also support surface water and stormwater characterization for PFAS, as the current use of injection wells for stormwater disposal could act as a conduit to facilitate PFAS entry into drinking water sources. We encourage further studies as outlined in the CAP.

Sanitary Surveys must also continue, particularly in those areas most likely to be impacted by past actions that increase the likelihood of PFAS contamination, such as those areas near current or former military bases, or where AFFFs have been utilized for practice or actual firefighting. This will allow prioritization for cleanup efforts, and early arrangement of alternative water supplies (if available) to minimize public exposure to PFAS.

We applaud how closely Ecology has been working with the state Department of Health (DOH) on this issue. It is a good acknowledgement of the importance of protecting drinking water supply. We support your continued efforts to work in alignment with DOH.

Thank you for the opportunity to comment.

Sincerely,

A handwritten signature in blue ink that reads "Judi Gladstone". The signature is written in a cursive, flowing style.

Judi Gladstone
Executive Director