Makarow, Irina (ECY)

From: john.lovie@whidbey.com

Sent: Tuesday, October 27, 2020 9:39 AM **To:** ECY RE CHEM ACTION PLANS (HWTR)

Cc: Flores, Lola (ECY)

Subject: Comments on Draft PFAS CAP

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Hi Irina,

Here are my comments on the Draft PFAS CAP. Copying Lola Flores from the Toxics in Fish implementation strategy for the comments on section 2.

- 1.0 Ensure drinking water is safe
 - 1.1 Identify funding for PFAS drinking water mitigation
 - Rather than leave it to the individual water systems to attempt to recover costs from the responsible party, consider doing this as a State, as has been done for example with tobacco and opioids. Make long term loans to water systems and then look at forgiving those loans when a settlement is awarded. Paging Bob Ferguson...
- 2.0 Manage environmental PFAS contamination
 - 2.1 Establish PFAS cleanup levels for soil and groundwater
 - Please coordinate with stormwater strategic initiative leads (copying Lola Flores) who are working on the Toxics in Fish Vital Sign to coordinate work on evaluating PFAS in marine biota, especially salmon and their predators, perhaps using culled pinnipeds as a proxy for orcas.
 - 2.2
 - 2.3 Work to prevent PFAS releases from firefighting foam use and manufacturing
 - I have seen 5 gallon drums of AFFF on the car deck of Washington State Ferries presumably for use in vehicle fires. I don't see this or other marine uses explicitly listed.
- 3.0 Reduce PFAS in products
 - 3.1
 - 3.2 Identify additional sources and uses of PFAS to consider in the second Safer Products for Washington cycle
 - Marine waxes, cleaners, waterproofing, lubricants
 http://www.starbrite.com/search?searchphrase=all&searchword=ptef
 - Teflon plumber's tape
- 4.0 Understand and manage PFAS in waste
 - 4.1
 - 4.2
 - 4.3 Evaluate Washington biosolids management
 - Look at leachate/runoff *from* biosolid application and other non-point source origins.

Cheers,

John Lovie



John Lovie President, Whidbey Island Water Systems Association

Phone: 732 236 9392 Email: mail@whidbeywatersystems.org

PO Box 1561 Freeland, WA 98249

www.whidbeywatersystems.org