

Makarow, Irina (ECY)

From: Christie Hedman <Christie.Hedman.46091262@p2a.co>
Sent: Thursday, November 19, 2020 11:06 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,

Please strengthen the CAP to 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.

Thank you for your consideration.

Regards,
Christie Hedman
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