

Makarow, Irina (ECY)

From: Darlene Schanfald <darlenes@olympus.net>
Sent: Thursday, November 12, 2020 10:38 AM
To: Makarow, Irina (ECY)
Subject: OEC comments on PFAS
Attachments: 11-20 PFAS comments to Ecology.docx

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Hazardous Waste and Toxics Reduction Program
Washington State Department of Ecology
P.O. Box 47600
Lacey, WA 98504-7696

Attached are comments from the Olympic Environmental Council on

Draft Per- and Polyfluoroalkyl Substances Chemical Action Plan - 20-04-035 October 2020

Darlene Schanfald, Secretary



PO Box 2664 Sequim WA 98382

11 November 2020

Hazardous Waste and Toxics Reduction Program
Washington State Department of Ecology
P.O. Box 47600
Lacey, WA 98504-7696

Attn: Irina Makarow, Chemical Action Planner
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Draft Per- and Polyfluoroalkyl Substances Chemical Action Plan - 20-04-035 October 2020

1. Ensure drinking water is safe.
2. Manage environmental PFAS contamination.
3. Reduce PFAS in products.
4. Understand and manage PFAS in waste.

The PFAS Chemical Action Plan (CAP) is this State's opportunity for Washington to demonstrate leadership and create a model for other states and the nation.

WA State cannot ignore the seriousness of this issue. Ecology has lingered in moving forward to take the reign of this matter but can no longer sit back. Ecology must act now, and quickly. You have the list of products with PFAS. Purchasing, selling and use of these should be banned. Not only are the consumers exposed - multiple times and in multiple ways, but so too are the workers that produce and sell the PFAS products. Import of products containing PFAS/PFOS, etc. should be banned from entering WA State.

Now more than ever, it is critical for the state to take strong action on PFAS chemicals with millions of people across the nation, and here in Washington, being impacted by these chemicals in potable water. Exposure to PFAS can weaken our immune systems, cause obesity, lower resistance to infectious diseases, reduce COVID-19 vaccine effectiveness making us more able to contact COVID-19, cause cancer, and may inhibit the formation of antibodies.

PFAS is in our marine waters exposing marine life to this forever chemical. It is in sewage wastes and these wastes are spread on farm, forest and other soils. Sewage-laden commercial compost is sold for gardening, landscaping and community gardens and exposing gardeners. It is used in residential gardens – exposing families and pets. Per- and polyfluoroalkyl substances are absorbed by edible crops, by grazing animals, and exposing wildlife.

The PFAS CAP must be strengthened to include the following recommendations:

Designate PFAS as a class as hazardous substances under the Model Toxics Control Act and adopt cleanup standards for all PFAS in 2021. This will help ensure polluters pay to clean up

contamination and potable water in communities, alleviating health and economic burdens of communities.

Existing PFAS contamination needs to be dealt with swiftly. It's not acceptable for any community to suffer health, economic or other negative consequences while the chemical industry continues to reap huge profits.

Pursue immediate testing of sewage wastes — sludge and effluent —and develop a standard for all PFAS.

Sewage wastes/residuals should be tested for PFAS chemicals, including soils upon which sludge was applied to dairy and other farms in our state. Alternative disposal methods should be investigated to keep PFAS off of farms and other lands.

Ban import and use of per- and polyfluoroalkyl substances in Washington State.

Produce a timeline of actions and enforcement steps.

Respectfully submitted,

Darlene Schanfald

Darlene Schanfald
Secretary