

## Makarow, Irina (ECY)

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**From:** swnsnisle@everyactioncustom.com on behalf of Stephen Swanson  
<swnsnisle@everyactioncustom.com>  
**Sent:** Saturday, December 12, 2020 11:48 AM  
**To:** ECY RE CHEM ACTION PLANS (HWTR)  
**Subject:** Please strengthen the draft PFAS CAP

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Dear Irina Makarow,

Thank you for your good work in developing the 2020 PFAS Chemical Action Plan (CAP) draft and helping ensure Washington State remains a national leader in addressing PFAS chemicals.

I am writing to you because, as a person of faith, I know we have a moral obligation to protect present and future generations from toxic contamination in the products we use every day. Your work of implementing strong standards for PFAS chemicals and cleaning up contaminated sites addresses this call to environmental justice.

I encourage you to incorporate the following values and actions into the draft PFAS Chemical Action Plan:

- **Transparency:** Immediately designate PFAS as a hazardous substance under the Model Toxics Control Act.
- **Accountability:** Require polluters and parties responsible for PFAS production to help pay for clean up of contaminated sites and drinking water.
- **Stewardship:** Pursue testing of PFAS in sludge (biosolids) and develop a sludge standard for PFAS.
- **Responsibility:** Address PFAS chemicals as a class and establish a cleanup standard for all PFAS in 2021. Expand beyond PFOS and PFOA to include the other types of PFAS being considered in the Department of Health's PFAS drinking water standard.
- **Commitment:** Shorten the timeline for regulating other products known to contain PFAS including apparel, waxes and polishes, cosmetics, and children's products. While we commend the agency for taking action through the Safer Products for WA Act, more must be done before its second cycle to address large sources of exposure identified in the CAP.

Personalize your message: All high flow wells in our neighborhood are heavily contaminated with PFOA, PFHxS, PFHxA and 2 others. This is the result of US Navy use of AFFF firefighting foam. Three and 1/2 years were spent on bottled water before the town of Coupeville's PFAS filtration plant was built and we were hooked to it. We now bear the thousands of dollar cost for this water.

PFHxS has the longest half-life in the body (8.5 years) of all the PFAS chemicals and has the same toxicity as PFOS so why is the acceptable level of PFHxS so much higher in drinking water than PFOS???????? They should be the same.

PFAS chemicals are used in ski waxes and when used contaminate the snow and thus end up in the water table. They should be high up in the list of items to be banned in this state. I switched to non-PFAS wax and have not had a noticeable drop in performance. In addition, the PFAS telomere alcohol used to remove waxes vaporizes and is extremely toxic. Limited time in the waxing sheds along with heavy industrial fans are a requirement for our racing teams. It is postulated that the concentrations of PFAS compounds in arctic wildlife are related to the breakdown of these PFAS alcohols.

Finally, these are forever chemicals, indestructible by any natural occurring process, and the entire class should be banned on this basis alone. Otherwise, chemical companies will continue to impose new PFAS variations on us without testing.

Thank you for doing your part to protect Washington's families and environment from toxic PFAS.

Sincerely,

Dr. Stephen Swanson

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