



City of Tacoma  
Environmental Services Department

January 4, 2021

Irina Makarow  
Department of Ecology  
P.O. Box 47600,  
Olympia, WA 98504

Dear Ms. Makarow,

Thank you for providing this opportunity to comment on practical Chemical Action Plan created to address PFAS chemicals.

The City of Tacoma would like to commend the Department of Ecology on the thorough and practical Chemical Action Plan created to address PFAS chemicals. Ecology's reliance on science and commitment to a measured process that employs appropriate analytical techniques, fate and transport models and risk assessment will move Washington toward reasonable and practical management of these troublesome chemicals. We believe Ecology's product stewardship approach is the most efficient and effective management strategy in addressing these persistent chemicals. Comments on specific sections follow below:

Section 2.1:

Analytical methods for PFOS must be determined before clean up levels can be established.

A thorough understanding of fate and transport is necessary in establishing clean up levels

We agree that an uncertainty analysis must accompany an eco- risk assessment

Section 2.3:

We agree that it is critical to investigate and mitigate industrial, military, and fire-fighting sites where levels of PFOA and PFOS in particular are very high in soils, groundwaters, and surface water due to historical contamination (these sites pose the greatest potential risks).

Section 3.0:

We agree that eliminating potential PFAS sources is critical in reducing negative environmental and human health impacts.

Section 3.1:

We strongly agree with recommendation 3.1 and suggest that a program subsidizing legacy carpet replacement in low income housing might be helpful.

Section 3.3

We agree with evaluating and potentially restricting priority consumer products

## Revised Settlement Agreement-Notice of Adjustment to Surface Water Charges

### Section 4.1

What is advance solids removal?

Ecology needs to consider whether EPA has developed analytical methods for PFAS suitable for biosolids

Ecology should work with local Industrial Pretreatment Programs to identify sources of PFAS in POTW influent

### Section 4.5

We commend Ecology on this measured and grounded approach and look forward to working with Ecology in collecting data and providing information on land application procedures and processes.

### Biosolids (Appendix 8)

We appreciate that Ecology recognizes that “The lack of potential industrial contamination in Washington means negative impacts from land application of Washington biosolids is unlikely.” We also agree that adoption of extremely low regulatory limits for soil PFAS could have adverse impacts on residuals recycling and may not deliver demonstrable risk reduction for human health and the environment.

Thank you for your consideration of these comments.

Respectfully,

Dan C. Thompson, Ph.D.  
Business Operations Division Manager  
Environmental Services