

The Lands Council

Our comments are attached, thank you.



January 22, 2021
To: Department of Ecology
Re: PFAS Chemical Action Plan

Greetings. The Lands Council is writing today to ask Washington State's Department of Ecology (Ecology) to take stronger, swifter action on toxic per- and polyfluoroalkyl substances (PFAS). While many of the actions proposed in Ecology's draft Chemical Action Plan (CAP) move our state in the right direction, this draft falls short of what we know is necessary to protect Washingtonians from these toxic forever chemicals. The PFAS CAP represents a significant opportunity for Washington to demonstrate national leadership and create a model for other states and the nation, just as it has done on toxic pollution issues for more than a decade.

Controlling and reducing PFAS is especially important as we confront COVID-19: among the most alarming impacts of PFAS contamination are its weakening effect on our immune systems and links to chronic diseases that make people more vulnerable to COVID-19. Elevated levels of a PFAS compound were associated with more severe forms of Covid-19, according to a Danish study now undergoing peer review. The research, which involved 323 patients infected with the coronavirus, found that those who had elevated levels of a chemical called PFBA were more than twice as likely to have a severe form of the disease. According to the Minnesota Department of Health, one type of PFAS, the chemical PFBA causes changes in the liver and thyroid, as well as decreased red blood cells, decreased cholesterol, and delayed eye opening in animal experiments. The Lands Council requests that Ecology strengthen the PFAS CAP to include the following recommendations:

-Spokane has a Waste to Energy Plant that currently burns materials containing PFAS. Testing to determine whether PFAS are exiting the plant is a critical first step. We ask that Ecology ensure safe disposal of PFAS-containing products. Washington State should prohibit the burning of PFAS solid and hazardous wastes and pursue the safest storage or disposal options.

-Identify safer alternatives and ban uses of PFAS beginning in 2025. Ecology should immediately declare apparel (including firefighter personal protective equipment), cleaning products, floor waxes and stone/wood sealers, and personal care products as priority products so that the search for safer alternatives begins now and bans can be put in place by 2025.

-Immediately designate the entire class of PFAS chemicals as hazardous substances under the Model Toxics Control Act (MTCA); adopt cleanup standards for all PFAS in 2021; and subject PFAS to the hazardous substance tax.

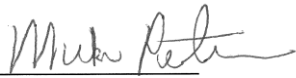
-Speed up timelines for dealing with PFAS contamination. An ambitious timeline must be established to identify and clean up toxic sites beginning in 2021.

-Pursue immediate testing of sludge (biosolids) and develop standards for all PFAS. Sludge from municipal treatment plants should be tested for PFAS chemicals, together with farms where sludge has been applied, and alternatives for sludge disposal should be pursued.

-Adopt strong drinking water standards in 2021 for all PFAS and expand testing to identify Washington drinking water systems contaminated with PFAS.

Thank you for the opportunity to comment.

Sincerely,

A handwritten signature in cursive script, appearing to read "Mike Petersen".

Mike Petersen, Executive Director