

Makarow, Irina (ECY)

From: Jean Mendoza <jeanmendoza@icloud.com>
Sent: Tuesday, October 27, 2020 5:14 AM
To: ECY RE CHEM ACTION PLANS (HWTR)
Subject: PFAS
Attachments: FOTC letter to Ecology re PFAS October 27 2020.pdf

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Dear WA State Dept. of Ecology,

Please consider the attached letter of concern regarding PFAS in the Yakima Basin.

Sincerely,

The Friends of Toppenish Creek



Friends of Toppenish Creek

October 27, 2020

Irina Makarov, Department of Ecology
P.O. Box 47600
Olympia, WA 98504-7600

ChemActionPlans@ecy.wa.gov

Dear WA State Dept. of Ecology,

Friends of Toppenish Creek (FOTC) is a 501(C)3 non-profit environmental group located in Yakima County. Today we comment on Ecology's Draft Chemical Action Plan (CAP) for Poly fluorinated PFAS because the relevant studies indicate a lack of concern for the people in the Yakima Basin.

Ecology did not conduct PFAS sampling in Central Washington in 2008 & 2016 except for surface water sampling on the Entiat River for background data. Since 57% of King County biosolids are land applied in Douglas County and 17% are land applied in Yakima County this points to a deliberate effort by the agency to minimize data collection regarding biosolids application to farmland. Since half of the Yakima County population and > 70% of the LYV population is Latino; since poverty levels in the LYV are much higher than the state average, this indifference could be described as discriminatory.

We do not make this statement lightly. Here is the evidence:

- Groundwater pollution: Nitrate levels in LYV monitoring wells are the highest in the state. Ecology has yet to collect data that would establish a baseline for LYV nitrates in LYV groundwater, although the agency has known about the problem since at least 2002.
- Infectious disease: In February 2019, a winter storm killed 1,900 cows in the LYV. Two dairies composted 950 of those carcasses in 2,300 feet of windrows. Ecology did no groundwater or soil testing at the sites. Ecology simply stated without evidence that there was no danger to human health.

On page 41 of the Draft CAP for PFAS, Ecology states:

Adoption of extremely low regulatory limits for soil PFAS could have adverse consequences for organics and residual recycling, and may not provide demonstrated risk-reduction for human health and the environment.

Our translation is that the Washington policy of applying biosolids to cropland is more important to Ecology than protecting either the health of the people or the quality of agricultural soils where PFAS may accumulate. With straight faces Ecology and DOH will say there is no proven risk from PFAS in the LYV. This will be true because the agencies simply do not investigate.

Here are further comments and recommendations from FOTC:

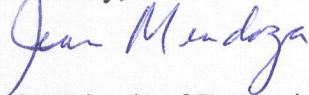
1. Forest and range fires are an annual occurrence in Eastern Washington. Firefighters are our heroes. Please recommend serum testing of firefighters who are exposed to PFAS in fire fighting chemicals and inform these men and women about the risks.
2. Native Americans in Central Washington eat more fish than the average Washingtonian. This increases the risks for this population which was not included in the demographic analysis. Please correct this omission.
3. There is no data for the Yakima Firing Center. If the DOD has performed PFAS sampling in this area, please include it in the plan. If not, please explain why not.
4. Consider a moratorium on application of biosolids to farmland until research is more conclusive. It is callous and imprudent to continue a practice that adds harmful chemicals to the land in undetermined amounts when there is no funding and no plan for evaluation.
5. Please require biosolid purveyors to inform the farmers who receive biosolids of the risks for PFAS accumulation in their soils.
6. On Page 404 the Draft CAP states: *An international study in 2011 stated that research on organic contaminants in biosolids has been undertaken for more than 30 years, and the increasing body of evidence demonstrates that the majority of compounds studied do not place human health at risk when biosolids are land applied on farmland (Clarke & Smith, 2011).* FOTC believes this is a misleading restatement of the Clarke & Smith paper. The Abstract for that paper states: *In particular, a number of 'emerging' OCs (PFOS, PFOA and PCAs) were identified for priority attention that are environmentally persistent and*

potentially toxic with unique chemical properties, or are present in large concentrations in sludge, that make it theoretically possible for them to enter human and ecological food-chains from biosolids-amended soil.

7. Please tell us where to access the data that estimates Washington application of PFAS to cropland at 6.95 Mg/ha.

Thank you for considering our concerns.

Sincerely,



The Friends of Toppenish Creek

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White Swan, WA 98952