



SUBMITTED VIA ONLINE COMMENT FORM

Board of Directors

December 29, 2020

Chair
John Stokes
Councilmember
City of Bellevue

State Department of Ecology
State Board of Health
State Department of Health

Vice Chair
Penny Sweet
Mayor
City of Kirkland

Re: Comments on Draft PFAS Chemical Action Plan

Secretary/Treasurer
Angela Birney
Mayor
City of Redmond

The Cascade Water Alliance (Cascade) has reviewed the background material soliciting comments regarding the draft Per- and Polyfluoroalkyl Substances (PFAS) Chemical Action Plan (CAP). Cascade is offering the following comments as part of the public comment period:

Mary Lou Pauly
Mayor
City of Issaquah

Executive Summary

Lloyd Warren
Vice President
Sammamish Plateau Water

Page 9: The Executive Summary and the CAP in its entirety fail to acknowledge and address the presence of PFAS in reclaimed water. This is a significant oversight. Given that reclaimed water is wastewater effluent treated to a different standard and deployed in a variety of land-based applications with potential impacts to both ground and surface waters, its role in the PFAS CAP should be developed and addressed within the wastewater treatment section.

Jon Ault
President
Skyway Water &
Sewer District

Page 17, Section 2.3: The CAP should also consider releases associated with reclaimed water, especially in those situations where the presence of PFAS in reclaimed water may exceed State Action Levels (SAL).

Allan Ekberg
Mayor
City of Tukwila

Chief Executive Officer
Ray Hoffman

Page 18, Section 2.3: DOE should also evaluate potential risks from PFAS releases in reclaimed water, especially in situations where PFAS levels exceed SAL.

Page 24, Section 4.1: Evaluation of PFAS in wastewater treatment should include the evaluation of PFAS in reclaimed water. This should include consideration of regular monitoring of reclaimed water as treated wastewater effluent. At a minimum, if PFAS is found in reclaimed water at levels above SAL it should be prohibited from use within Critical Aquifer Recharge Areas (CARAs).

Page 30: Reclaimed Water should be included in the WWTP sampling profile as it is wastewater effluent.

Cascade Water Alliance
520 112th Ave NE, Suite 400
Bellevue, WA 98004

Phone: 425.453.0930
Fax: 425.453.0953

www.cascadewater.org

Draft CAP Recommendations

Page 65, Section 4.1: This section proposes evaluation of PFAS in wastewater treatment plant (WWTP) influent and effluent. This should be expanded to include the evaluation of reclaimed water, as reclaimed water is treated wastewater effluent. PFAS monitoring requirements for reclaimed water as a wastewater effluent should also be considered.

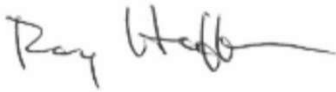
Appendix 4: Sources and Uses

Pg. 164, Section 3.4.2: Again, there is no mention of reclaimed water as a type of wastewater effluent and potential impacts on both surface and groundwater quality.

Pg. 183 Recommendation 4.1: Both sampling and potential monitoring of reclaimed water as wastewater effluent should be considered in this section.

On behalf of Cascade, thank you for your consideration of these comments as part of the rulemaking process.

Sincerely,

A handwritten signature in black ink that reads "Ray Hoffman". The signature is written in a cursive, slightly slanted style.

Ray Hoffman
Chief Executive Officer