

## RE Sources

Please see attached comment letter



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To: Irina Makarow  
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Transmitted Via Online Comment Form: <http://hwtr.ecology.commentinput.com/?id=j4eJD>

21 Jan 2021

**RE: Draft PFAS Chemical Action Plan**

Dear Ms. Makarow,

Thank you for taking the time to consider our comments on the draft Per- and Polyfluoroalkyl Substances Chemical Action Plan (CAP).

RE Sources is a non-profit organization located in northwest Washington and founded in 1982. We work to protect the health of northwest Washington's people and ecosystems through the application of science, education, advocacy, and action. Our priority programs include Protecting the Salish Sea, Freshwater Restoration, Climate Action, and Fighting Pollution—all critical issues affecting our region. Our North Sound Baykeeper is also a member of the Waterkeeper Alliance, with over 300 organizations in 34 countries around the world that promote fishable, swimmable, drinkable water. RE Sources has thousands of supporters in Whatcom, Skagit, and San Juan counties, and we submit these comments on their behalf.

The recent crude oil train derailment and spill in Custer, just north of our office, hit home the importance of having the necessary laws and regulations in place that will stop the production and use of PFAS compounds in all facets of our life. Following the derailment, PFAS containing Fire Fighting Foam (FFF) was used to extinguish the flames and prevent the train cars from exploding. While the use of the FFF was instrumental in containing the site quickly, we are now left with a site contaminated with PFAS in addition to crude oil. The derailment occurred in the middle of a town whose primary drinking water comes from private wells that are now at risk from PFAS contamination. There are also tributaries to a salmon bearing stream within a block of the accident.

Despite the use of FFF to control the fires and the obvious contamination from PFAS, the Department of Ecology only discussed testing groundwater for hydrocarbons<sup>1</sup>; there is no mention of testing for PFAS or even that PFAS is a contaminant of concern. Testing for PFAS may be tricky given the sheer number of PFAS compounds and the proprietary FFF that was used in the accident. Regulation should be enacted that will require the quick disclosure of the chemical makeup of any PFAS containing material. This event clearly illustrates the need for a Chemical Action Plan that can act quickly to cleanup up PFAS contamination and prevent further use and spread of this toxic, persistent chemical.

It is evident that a lot of thought and effort went into the creation of the draft PFAS CAP; it is thorough and well researched. We agree that the family of PFAS compounds should be addressed as a whole and that the focus on the CAP should be source control. We need to quickly assess where the PFAS is originating from and stop the production at the source or at minimum control it from getting into the environment. However, until we can control the source of PFAS we need to take additional safety measures to protect people and the environment from these hazardous compounds.

According to the CAP, most of the PFAS that enters Wastewater Treatment Plants originates from domestic uses. This means that people unknowingly are purchasing, using, and exposing themselves to PFAS everyday. Until the production of these chemicals is stopped people need to be made aware of these products through labeling and educational outreach. This needs to happen now, 2021.

The CAP does not recommend a change to current biosolids regulation or management citing information gaps in the risks that PFAS in biosolids pose to human health and the environment. Our research suggests that there is ample evidence to show that not only is PFAS found in biosolids<sup>2</sup> but that is also taken up by agricultural plants.<sup>3,4</sup> This research indicates that biosolids application is a practice that delivers PFAS into our food web. Applying biosolids at an agronomic rate as suggested in the CAP may limit the exposure of people to PFAS but it does not prevent it. Even small exposures to this accumulative toxic can have dire health consequences.

We would like to see more testing at wastewater treatment plants to assess the amount of PFAS in the influent and effluent so that we have an idea of how much PFAS is in the biosolids. We also suggest that no new permits are given to biosolid facilities until there is

empirical evidence that biosolids are not a source of PFAS or other toxic contamination. People have the right to know about the potential contamination in their food, therefore, labeling and educational outreach needs to happen this year.

We thank you for all of your hard work on creating this ambitious PFAS Chemical Action Plan and for considering our concerns and suggestions. Given the toxic nature of PFAS and widespread use and application we encourage a swift implementation of the recommendations outlined in the CAP.

Sincerely,

Kirsten McDade  
Pollution Prevention Specialist

References:

<sup>1</sup><https://ecology.wa.gov/Spills-Cleanup/Spills/Spill-preparedness-response/Responding-to-spill-incidents/Spill-incidents/Custer-Crude-Oil-Derailment-2020>

<sup>2</sup>Sepulvado, J.G., Blaine, A.C., Hundal, L.S., and Higgins, C.P. Occurrence and Fate of Perfluorochemicals in Soil Following the Land Application of Municipal Biosolids. 2011. Environ. Sci. Technol. 2011,45,19,8106-8112. Doi: 10.1021/es103903d

<sup>3</sup>Ghisi R, Vamerali T, Manzetti S. Accumulation of perfluorinated alkyl substances (PFAS) in agricultural plants: A review. 2019. Environ Res. Feb;169:326-341. Doi: 10.1016/j.envres.2018.10.023.

<sup>4</sup>Wang W, Rhodes G, Ge J, Yu X, Li H. Uptake and accumulation of per- and polyfluoroalkyl substances in plants. Chemosphere. 2020 Dec;261:127584. doi: 10.1016/j.chemosphere.2020.127584. Epub 2020 Jul 19. PMID: 32717507.