

## Makarow, Irina (ECY)

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**From:** Donald Greenberg <donauldgreenberg@gmail.com>  
**Sent:** Wednesday, December 16, 2020 8:08 AM  
**To:** ECY RE CHEM ACTION PLANS (HWTR)  
**Subject:** Will you strengthen the PFAS Chemical Action Plan (CAP)?

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Dear Hazardous Waste and Toxics Reduction Program,

I am 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 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. Turning off the tap on 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.

I request that Ecology strengthen the PFAS CAP to include the following recommendations:

-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.

-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.

Thank you for your consideration.

Sincerely,  
Donald Greenberg  
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Juneau, AK 99801