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Rainier Division

4822 70th Avenue East Fife, WA 98424

January 12, 2021

Via electronic submission: ChemActionPlans@ecy.wa.gov

Ms. Irina Makarow
Washington Department of Ecology
P.O. Box 47600
Olympia, WA 98504-7600

RE: Draft PFAS Chemical Action Plan

Dear Ms. Makarow:

Waste Connections appreciates the opportunity to provide comments on the Washington Department of Ecology's (Ecology) Draft PFAS Chemical Action Plan (CAP). Waste Connections is an integrated solid waste services-company that provides essential public services that protect public health, human safety and the environment in the geographic area proposed to be covered by the Draft PFAS CAP. Our services include non-hazardous waste collection, transfer, disposal and comprehensive recycling services.

In general, Waste Connections supports the department's efforts to measure per- and polyfluoroalkyl substances (PFAS) contamination and reduce PFAS exposure. We also support the goal of reducing PFAS in products as the most effective and economic means by which public exposure to PFAS can be mitigated. As long as PFAS remain in products, the public will be exposed to them. Solid waste system operators neither manufacture nor use PFAS, we are receivers of waste-containing PFAS from the communities and producers we serve. The CAP should acknowledge the important role proper landfill disposal of PFAS can have in removing contaminated products and media from the environment. Landfills will continue to receive and sequester PFAS in MSW so long PFAS are included in consumer and industrial products.

Landfills provide safe, environmentally protective management of Washington's municipal solid waste. Ecology should recognize that landfills provide an important function of sequestering a significant amount of PFAS, thereby removing the compounds from the environment and serve as an effective means for secure disposal of waste containing PFAS. While most PFAS will remain in the waste mass, some trace amount will be mobilized. This trace amount will be controlled because Subtitle C and D landfills are lined to prevent migration of contaminants into the groundwater. We concur with the



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National Waste & Recycling Association (NWRA) that Ecology should include language in the CAP addressing how Subtitle C and D landfills can provide for effective long-term management of PFAS wastes. Landfill management is currently the most environmentally sound method of managing PFAS containing wastes because: (1) most of the PFAS remain sequestered within the landfill, and (2) lined-landfills protect the groundwater.

First, it is important to place landfills in proper context when examining potential PFAS exposure routes for the general public. While it is true that landfills receive PFAS, this does not equate to any significant public exposure. The public is exposed to PFAS to a much greater degree through multiple other routes and products, such as the dust in their homes and the foods they eat and the consumer products that they purchase. We recommend that the CAP prioritize an assessment of the contribution of various routes of exposure for the average person and prioritize minimizing the most significant of those routes.

Second, it is critical to understand the relationship between landfills and publicly owned treatment works (POTWs). Landfills and POTWs are highly interdependent, and both are vital to Washington communities. Many landfills rely on POTWs for leachate treatment to ensure compliance in managing leachate generated at the landfill. POTWs, in turn, increasingly rely on landfills for biosolids management. Efforts to address PFAS at landfills and POTWs must avoid disrupting this interdependence. If landfills curtail acceptance of biosolids from POTWs to avoid PFAS, or POTWs are forced to exclude landfill leachate, those waste streams will be stranded. At best, this would impose significant costs for alternative management of those wastes for businesses and consumers; at worst, it could curtail the ability of a landfill or POTW to continue operating. PFAS cannot be significantly reduced in landfill leachate without limiting inbound waste sources, so long as PFAS continue to circulate in the economy in the form of food packaging, construction materials, carpeting, myriad household products, and manufacturing byproducts.

As highlighted by the NWRA, State policymaking must be grounded in an understanding that PFAS cannot be completely eliminated from landfills. Landfills cannot and should not avoid receipt of PFAS-containing wastes from households and other generators, who routinely discard household products, packaging, and goods containing PFAS. There are no other viable alternatives to handle this existing waste stream in a safe, environmentally sound protective manner. Subtitle D landfills are engineered to handle waste streams like this and many more. While the amount of PFAS contributed to the waste stream by each individual generator may be small, their collective impact could be



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significant. At landfills servicing few industrial generators, small-volume generators may be the primary source of PFAS in the waste stream. PFOA and PFOS concentrations in leachate appear to be declining as a result of phase-outs of these compounds in the marketplace. More importantly, with the phase-out of PFOA and PFOS, average levels of these compounds in human blood levels have declined from 1999 to 2014 by 60% and 80% respectively.¹ We urge the State to continue seeking means of assisting PFAS manufacturers and users to transition away from their use and avoid importation of PFAS containing consumer products into Washington.

The NWRA, the Washington Refuse and Recycling Association (WRRRA) and other solid waste operators will be submitting comments on the proposed plan. Waste Connections supports and incorporates the comments submitted by NWRA, WRRRA and their member companies. Waste Connections not only supports the comments of the NWRA but actively participates in their PFAS sub-committee.

Waste Connections appreciates the opportunity to comment on the PFAS CAP and we look forward to continuing to work with your office on this matter. Should you have any questions, please call Jody Snyder at (253) 377-0362 or e-mail at jody.snyder@wasteconnections.com.

Sincerely,

Matthew O'Connell
Division Vice President
Waste Connections

¹ *Perfluoroalkyl and Polyfluoroalkyl Substances (PFAS) in the U.S. Population*. August 21, 2017, https://www.atsdr.cdc.gov/pfas/docs/PFAS_in_People.pdf; Agency for Toxic Substances and Disease Registry, CDC.