



**Friends of Miller Peninsula State Park/PO Box 2664/Sequim WA/98382**

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Hazardous Waste and Toxics Reduction Program  
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**RE: Publication number 23-04-025**

Friends of Miller Peninsula State Park, a federally recognized non-profit formed in 1990, submits the following comments.

We applaud the WA State Department of Ecology for moving forward on this very important matter. Sadly, like so many other chemicals, phthalates have been allowed to be marketed through so many products, including soaps, dryer sheets, perfumes, shampoos, hair dyes, perfumed packets inserted in hair dryers, air fresheners, surface cleaners, cleaning products, and PVC building products including vinyl flooring. These then have polluted air, soil, food, the marine ecosystem, impacting the health of humans and wildlife. Phthalates have rightly earned the nickname, the “everywhere contaminant.”

We are pleased to see Ecology will approach phthalates by class, rather than individual chemicals. Your finely detailed document shows the ubiquity of this chemical, the cumulative impacts, the impossibility of the public to avoid exposure, leading to the conclusion that the timeline for regulations should be advanced. Indeed, it seems to us that the state should use its legal and regulatory powers to end the uses of phthalates where safer alternatives currently exist for consumer products.

Many of your report’s recommendations address the hazard posed by phthalates in products and purchaser education or swapping out individual products. While important, these individual or “downstream” measures are burdensome and the least effective way to reduce people’s exposure to toxic chemicals. Hence, in addition to ending unnecessary uses of phthalates, manufacturers must be required to label their products that have phthalates – a warning label that names this toxin *and* its health impacts.

The procurement measures outlined in the plan are an actionable step to shift market availability and build demand. Ecology should leverage existing resources that can facilitate the state purchasing of less-toxic building materials, including phthalate-free materials. Procurement guidelines should avoid other toxins like flame retardants, dioxins and formaldehyde.

We urge Ecology to commit to a more ambitious timeline to complete its work (sooner than three years) and put in place regulations that will more quickly advance the state’s handling of this toxic contaminant.

**Data collection** - Ecology outlines many data collection steps to monitor phthalate levels in the environment. These studies should be designed to assess other hazardous chemicals at the same time, to build our understanding of people's exposures to a complex array of avoidable chemicals in air, water, soil and food crops.

**Phthalate wastes** – Like all persistent contaminants, phthalates pose a burden in the waste stream. A deep concern is the impacts of sewage disposal, including the sale of commercial compost derived from sludge that contains contaminants or pathogens. Without doubt, sewage residuals host toxic ingredients, including phthalates.

For a few years, Ecology has promised a map of locations where sewage wastes are spread. Supposedly a staff person was working on it. This information has not been forthcoming. It is important that the scientists, advocates and the public have this information to figure out if there are burdens to communities living near these disposal sites, including threats to drinking water.

We would encourage your citations to include those of Dr. Anne Steinemann. Dr. Steinemann, while at the University of Washington, helped to initiate research on phthalates. She has taught at several universities within the United States and in other countries, and the James Cook University, Australia. She now serves as Honorary Professor of Civil Engineering at both universities and serves as adviser to governments and industries around the world. She could advise on your agency's phthalates studies, if willing.

Her most current publications can be found here:  
<https://www.drsteinemann.com/publications.html>

### ***Anne Steinemann's work***

#### **The fragranced products phenomenon: air quality and health, science and policy**

- [Open Access](#)
- [Published: 19 September 2020](#)

#### **The fragranced products phenomenon: air quality and health, science and policy**

- [Anne Steinemann](#) *Air Quality, Atmosphere & Health* volume 14, pages 235–243 (2021)

<https://www.drsteinemann.com/publications.html>

#### [Fragranced Consumer Products: Emissions, Exposures, Effects](#)

A collection of 17 sole-authored journal articles by Dr. Anne Steinemann

Please keep us informed as this plan moves forward.

Darlene Schanfald, Ph.D.  
Chair