



Washington Association of Sewer & Water Districts

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January 23, 2024

Department of Ecology

Via comment website

[Aqueous Film-Forming Foam Draft Environmental Impact Statement \(commentinput.com\)](https://commentinput.com)

RE: Comments on AFFF Disposal Options EIS

Thank you for the opportunity to comment on the AFFF Disposal Options. The Washington Association of Sewer and Water Districts represents more than 180 public sewer and water districts in the state, serving nearly 20% of our state's population. These districts provide cost-effective sewer and water services—ranging from the state's largest population centers, to the smallest rural communities. Clean water is a major concern to both our membership and the clients they serve. The potential for contamination is always a concern, especially since, beyond our wellheads and collection points, we have no control over what is sprayed, injected, discharged or built near our facilities. The situation with PFAS over the entire country is especially alarming given the longevity and ease of travel of these compounds.

We appreciate Ecology's efforts to develop the best solutions for disposal of AFFF. Our focus will always be to keep contaminants out of water supplies, as it is more difficult and expensive to remove them than to keep them out in the first place. Our reasoning and preferences for the options in the EIS are as follows:

1. Solidification and Landfilling

We would not support this option. There will be the hazards of collection and transport, and the resulting solids when buried, still carry the possibility of leaching into the environment. There is also no way to recover this material and treat the PFAS compounds when technology becomes available.

2. Deep Well Injection

We would not support this option. Again, hazards of collection and transport exist, plus the possibility of polluting the environment and groundwater supplies, and lack of recoverability for future treatment.

3. Incineration

This may be an option. While collection and transport hazards are present, at the endpoint the compounds are destroyed and residuals are dealt with in a safe manner. This is, of course, predicated on proper safeguards at the incineration facility that do not allow pollutants to go airborne.

4. Approved Hold in Place

This may be the best option of the 5 outlined. Collection and transport hazards are eliminated for the short term. As indicated, approved containment would be required. There may be an issue of how safe the containment is from vandalism, accident or natural disaster. There may also be an issue of space availability for smaller facilities. The AFFF remains available in the future for destruction as technologies develop.

5. No Action

Not an option. Regulators must know where it is kept, and that it is safe from contaminating the environment, as well as plan for future remediation of these compounds.

We would like to reopen a 6th option that was closed by Ecology, and that is the collection of AFFF into one site. Collection and transport hazards would exist, but robust containment could be designed, and it would not be scattered across the state in smaller containment units that would be in population centers. When the time came, destruction technologies could be set up at just one site, reducing costs and dangers of release near people.

We appreciate the thought, work and research that has gone into developing these options.

Sincerely,



Judi Gladstone
Executive Director
WASWD