Marli Heininger

From the perspective of an electric utility that operates in generation, transmission, and distribution within WA, management options that are highly compatible with Polychlorinated Biphenyls that are incidental in electric equipment is very desirable. A plan for general industry to be able to hold small quantities safely until disposal would be very useful. Aside from bagging product and staging it near other regulated chemicals/waste, there's not much else to do. I have encountered a situation where there is brand new, unadulterated, unused product in it's original container, yet waste profiling is a pain. All efforts to get more details from the manufacturer have gone nowhere, and I do not have much confidence in lab analysis in addition to the unnecessary costs to identify something that has known hazards. Guidance for that would be helpful.

Considering how PCBs are either buried or incinerated, I am inclined to follow those practices. However, landfilling a forever chemical still poses ongoing risk. Since hormone interference is among the health effects, solidification in concrete sounds extremely insufficient and is certainly not secure against any sort of natural disaster. The same goes for deep well injection - that sounds like the most dangerous and expensive of all the options. That is an entire industry that doesn't exist, creates more exposure, and will leave more natural spaces poisoned for years and years. Human error is the biggest factor here.

Incineration is an ideal treatment method since that infrastructure and process stream already exists. Plus, we can scientifically determine what needs to be done to burn the material hot enough for cleaner emissions. If ever a landfill of any kind needs to be remediated - such as the Pasco Landfill, a nasty intensive project - the long term costs will be so much greater and continue to spread around potential exposure or spills. A one and done solution should be prioritized for workers, the general public, carbon emissions, and permanent destruction of a chemical that won't be destroyed by any other natural elements. The fact that these TSCA chemicals like PCBs and PFAs are remarkably resistant to any sort of chemical degradation and cannot be effectively removed from drinking water is a very important element to consider to actually protect public health for multiple generations to come. More novel treatment methods could develop in time, but that also includes spreading the material around and spending more carbon from our finite resources. A good road map with benchmarks for the timeline on how the state might collectively work to dispose of this chemical would be very helpful for industries that have contact with this chemical but aren't necessarily experts with regards to its performance.

A specific set of waste profiles with prescribed treatment methods would also be helpful. While we can all declare our own waste and perform our own testing, this entire TSCA update revolves around manufacturer responsibility, and I strongly support that. They profited for decades, and this is the cost of business. If companies will refuse to share "proprietary" information, I think the regulatory agencies should hold them accountable, and in the interest of efficient disposal that isn't hindered with excessive red tape, having categorical or concentration based profiles would be very helpful. It makes no sense to sample unused product when *someone* in the industry knows what it is. It isn't fair to all the waste workers, lab techs, and field crews to have to expose themselves to collect samples over an arbitrary threshold. If the PFAs are there, they're there. For AFFF specifically, it's obviously not flammable or corrosive, but it doesn't neatly fall under a toxic character either.

I really appreciate all the work the state of WA is doing proactively for this regulatory update - I wish others on the West Coast were employing the same! Thank you for your work and reminders for the public comment period.