

## Erick McWayne

Thank you for the opportunity to provide comments on the AFFF disposal guidelines. I recommend presenting the disposal options as "destructive" and "non-destructive" options. In addition to incineration, other destructive PFAS treatment technologies applicable to AFFF include electrochemical oxidation, plasma treatment, supercritical water oxidation, alkaline hydrothermal liquefaction, and sonochemical methods. A generic placeholder for new destructive technologies could also be included as "other destructive treatment technologies applicable to AFFF". Ecology may wish to specify that all residuals from destructive treatment be disposed of at a permitted and lined landfill with leachate collection system. A requirement for testing residuals prior to disposal may also be included to confirm PFAS destruction. Testing treatment residuals for ultra-shortchain PFAS including carbon tetrafluoride and trifluoroacetate to confirm complete PFAS destruction, or other similar confirmation is recommended. Thank you!