

King County | Wastewater Treatment

Director's Office

King Street Center, KSC-NR-6200
201 South Jackson Street
Seattle, WA 98104-3854

July 18, 2025

Stacey Callaway
WA Department of Ecology
PO Box 47600
Olympia, WA 98504-7600

Support for Safer Products for Washington Cycle 1.5 PFAS Preliminary Draft Rule

Dear Stacey Callaway:

The King County Wastewater Treatment Division (WTD) of the King County Department of Natural Resources and Parks supports the Washington State Department of Ecology's (Ecology) efforts to timely execute the development of the draft Cycle 1.5 rule, as envisioned and mandated by the state legislature's adoption of the laws for the Safer Products for Washington legislation. This includes support for the Proposed Rule in the Washington Administrative Code (WAC): Chapter 173-337 WAC: Safer Products Restrictions and Reporting, Safer Products for Washington Cycle 1.5.

WTD operates three regional wastewater treatment plants and two smaller treatment plants, serving almost 2 million residents within a 424 square mile service area. Clean water utilities such as WTD are receivers of Per- and polyfluoroalkyl substances (PFAS) from residential and commercial wastewater collected in the service area. Clean water utilities do not manufacture or produce PFAS, and conventional biological wastewater treatment processes like those we operate are not designed to degrade or remove PFAS compounds.

Proposed Rule Chapter 173-337 WAC: Safer Products Restrictions and Reporting, Safer Products for Washington Cycle 1.5., focuses on products containing PFAS. The Proposed Rule complements clean water utilities' efforts and requirements under the Clean Water Act to identify methods and take reasonable actions to eliminate or reduce toxic compounds.

WTD strongly supports efforts to address PFAS pollution at its source. Federal and state water quality regulations are evolving, and WTD's National Pollutant Discharge Elimination System (NPDES) permit adopted by Ecology in June 2024 for King County's West Point Wastewater Treatment Plant includes a new focus on data collection, with requirements to

Support for Safer Products for Washington Cycle 1.5 PFAS Preliminary Draft Rule


July 18, 2025

Page 2

monitor for PFAS, and to conduct an Industrial User Survey to evaluate sources of PFAS in the industrial and commercial businesses in the sewer shed. Downstream remediation and treatment, while sometimes necessary, are typically much more expensive than source control, and not something our treatment facilities are designed to do at this time. This makes source control efforts such as the Safer Products Program even more important.

Additionally, WTD supports the comments on the Cycle 1.5 draft rulemaking of our partner County agency staff experts at Public Health – Seattle & King County and the Hazardous Waste Management Program. WTD encourages Ecology to accelerate timelines for future restrictions and expansion of the restricted product categories to not only minimize PFAS exposures and maximize health and environmental benefits but also provide critical regulatory clarity to downstream entities such as clean water utilities.

Sincerely,

Signed by:

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Kamuron Gurol

Division Director

cc: John Taylor, Director, Department of Natural Resources and Parks (DNRP)
Dr. Faisal Khan, Director, Public Health – Seattle & King County
Maythia Airhart, Program Director, Hazardous Waste Management Program