

# Sam Archer

First, as thoroughly identified in the proposed rule making document (WSR 25-12-097), tracking and reducing PFAS in the environment is likely to be beneficial for our health (and that of any other animals in the ecosystem) and not terribly costly for anyone in the long-run (e.g. I especially appreciated Ecology's efforts to find the other automotive wash surfactants with similar performance are available and not prohibitively more expensive). I am very much in favor of this proposed rule.

However, I do have some concerns/comments about some of the details:

- It's not immediately clear (unless I missed it somewhere) how the 3 restricted categories were settled upon out of all the (un)mentioned products that contain PFAS. I presume these are categories where the PFAS doesn't serve a significant purpose in the product or can be easily replaced. Nonetheless it makes me question why there may be a restriction on hats, but not serving spoons (one of which I'm way more likely to eat off of). If there is a definite reason for limiting restrictions to only a small group, it could be made more clear in the documentation, and it would be nice to hear that there's at least a framework in place to expand those restrictions later if the need arises.

- I \*sort of\* understand why the restricted categories are limited to items with "intentionally added" PFAS, but it seems like we'd benefit greatly from increased reporting on items even if the PFAS is present incidentally. After all, the PFAS accumulating in our bodies doesn't segment itself into "intentionally used" and "from recycled materials".

- The unusually nit-picky language around what counts as "restricted" or "reporting required" makes me worry that there will be a lot of available loopholes to be exploited. For example, a sporting goods store could start carrying non-PFAS clothing but offering to douse it with water repellant spray at checkout. I'm not even sure spray-on water repellant falls into the reporting-required categories; and so not only would this potentially not prevent PFAS on clothing, but now the source is unreported and potentially worse (I have to imagine using aftermarket spray will ultimately result in more PFAS in the environment than applying it during manufacture). The desire not to be overly restrictive is reasonable, but I think reporting should be required more broadly so that PFAS being introduced to sidestep restrictions is still tracked.

Overall would still rather see the rule amended as written than not, but think it could be improved.