



January 27, 2023

Department of Ecology  
P.O. Box 47600  
Olympia, WA, 98504

Re: Comments on Draft PFAS Guidance for Investigating & Remediating PFAS Contamination

Thank you for the opportunity to provide comments on this document. The following comment pertains to Chapter 6.0: Treatment Technologies.

The last sentence of Section 6.2.3 on Thermal Treatment mentions states, "...incineration technology is associated with high energy consumption, which should be considered as a part of using sustainable technologies." There is one other mention of energy usage in 6.1.1.3. It is agreed that sustainability is an important consideration for treatment technologies, however there is no other mention of sustainability considerations in the document or for any other technologies. It is therefore requested to add additional language on sustainability considerations within this chapter. This can be done in the Overview of 6.0 and/or within sections 6.1 and 6.2.

While sustainability assessments may not be widely available for each technology, a general statement on the need to consider sustainability implications can readily be included, along with examples of technology components or processes that will have the greatest impact on sustainability. For example, expected annual operation and maintenance including energy usage of running a system (especially considering years/decades of expected operation), anticipated equipment changeouts, if waste is continually produced, etc. Some of the more striking comparisons would be between broad technology approaches, for example *ex situ* versus *in situ* methods.

Again, thank you for the opportunity to comment on this document.

Sincerely,

A handwritten signature in black ink, appearing to read "Kristen Thoreson".

Kristen Thoreson, Ph.D.  
Vice President of Quality and Process Improvement