

JEFF DONOVAN

See attached comments.

Department of Ecology

RE: Draft Guidance for Investigating and Remediating PFAS Contamination in Washington State

Dear Mr. Gordon,

Thank you for the opportunity to comment on this Draft Guidance for Investigating and Remediating PFAS Contamination. Spokane has a strong interest in protecting the Spokane River and Spokane Valley-Rathdrum Prairie Aquifer, a sole-source aquifer for our community and surrounding metro area. Regulations and guidance for site cleanups involving PFAS must be approached thoughtfully, as potential impacts could be far reaching. Given the potential implications to both sewer and water utilities such as ours, this guidance manual should be carefully balanced in protecting public health while maintaining realistic targets for controlling these ubiquitous contaminants.

Please consider the comments below:

- **General Comment:** This guidance document generally defers to State Action Levels developed by Washington State Department of Health for setting recommended MTCA clean up levels. EPA is currently developing Maximum Contaminant Levels for PFAS in drinking water. A CERCLA rulemaking is underway by EPA for designating certain PFAS chemicals as Hazardous Substances. Recommended surface water quality standards for PFAS are also in development. It seems premature to finalize this guidance document prior to these new standards being released.
- **Section 1.0 (Purpose and applicability):** The exact purpose of this guidance document is unclear. Is Ecology intending to promulgate MTCA cleanup levels? Provide guidance on conducting risk-based cleanups? Provide a nexus between MTCA and how Department of Health sets its State Action Levels for drinking water? Further clarity should be provided, as the way it's written right now still leaves ambiguity as to how this guidance should be applied. If it is indeed intended to just be guidance, that should be stated.
- **Chapter 3 (General comment):** It is unclear how background levels of PFAS should be addressed. Given the documented, ubiquitous nature of PFAS in the environment, a discussion would be appropriate in this chapter for how background levels of PFAS are to be handled.
- **Section 4.3 (Options for unfinished aqueous and solid matrices):** For the test methods referenced in this section, additional discussion may be warranted on how these methods are to be applied when conducting site cleanups. Are the methods not approved by the EPA meant to be used as just screening tools? Or to set cleanup targets? A discussion on any limitations of unapproved test methods would be helpful. Compliance with cleanup targets should only be done using approved methods.

Respectfully,



Jeff Donovan
Environmental Analyst
Riverside Park Water Reclamation Facility
City of Spokane