

Bob Danson

Please see the attached comment from Olympic View Water & Sewer District regarding the draft PFAS guidance.

Best Regards,

Bob Danson

General Manager, Olympic View Water & Sewer District



OLYMPIC VIEW WATER & SEWER DISTRICT Board of Commissioners

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Washington State Department of Ecology

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

The Olympic View Water & Sewer District (District) appreciates the opportunity to comment on the Department of Ecology’s “Draft PFAS Guidance for Investigating and Remediating PFAS Contamination in Washington State” (Manual). As a water purveyor with concerns about PFAS contamination of our water sources, we appreciate Ecology’s efforts to recognize PFAS as a threat to the environment and public health. PFAS in drinking water has now become a threat to all water purveyors due to the prevalence of PFAS in the environment, which can and does lead to water source contamination in many parts of the State.

With this in mind, we feel we should note some areas of concern with the draft manual and request Ecology to be mindful of these points in not only the manual in question, but also with Ecology’s efforts in general. Please be aware of the following concerns:

1. The manual should provide policy and direction on how water purveyors will be assisted by Ecology in looking for responsible parties in the event of drinking water source impacts. This assistance will be critical to the water purveyor when evaluating options moving forward. Purveyors will need the expertise and resources of Ecology to properly identify responsible parties and contamination sources.
2. When PFAS contamination has occurred, and has the potential to contaminate a water source, or is close to a water source, the manual should include language requiring prompt contact of any potentially impacted water purveyor. When an MTCA investigation and remediation effort has occurred for impacted or potentially impacted water sources where there are known or potential impacts to a water system, the procedure should include a public process and stakeholder engagement of the water system, since the water system is the party responsible for compliance with WAC 246-290 SAL’s. In these instances, the process should be directly overseen by DOE as a formal cleanup, and the water purveyor should be directly involved in the investigation and cleanup efforts. This will allow the purveyor an opportunity to work with the parties involved and with Ecology to understand

the impacts and how to prepare and/or eliminate the PFAS contamination before more costly treatments become necessary. In addition, if the water source is contaminated, the purveyor would have knowledge of the source and can coordinate efforts to find ways to promptly protect public health, treat the current contaminant, and minimize future contamination.

3. Initial testing of source water is critical to understand the impact of any contamination event. Such testing should be required, and mandatory monitoring should continue for an extended period of time based on groundwater modeling and time of travel analysis. This is needed because PFAS is persistent in the environment and contaminant plumes may impact water sources over extended periods of time. Without extended time monitoring, there is no way to know if cleanup efforts were effective in protecting the source water long term.
4. The manual allows what it considers safe levels of PFAS based on current State regulations. Our understanding is that “safe levels” of PFAS will be changing on the federal level (EPA) in the near future. Which means current cleanup with “safe levels” may not be adequate when future regulations are implemented. We also know that most consumers consider any level of PFAS unacceptable. Ecology absolutely cannot allow a link to current levels.

In addition to the manual, we request Ecology to work with the Department of Health and the EPA to try to address the undue and potentially crippling burden that PFAS can place on water purveyors. Beyond contaminant releases from direct use of PFAS containing materials, drinking water sources risk contamination from stormwater infiltration, septic systems, and other potential non-point sources. As these additional PFAS sources become known, we request Ecology to take the lead on protecting drinking water resources by implementing regulations and cleanup programs that focus on these drinking water assets.

Thank you for allowing the District the opportunity to comment on this draft manual. And thank you again for your efforts in recognizing PFAS as an emerging contaminant with the understanding that cleanup of this contaminant will require procedures that minimize both the immediate threat and the long-term impacts.

Sincerely,

Bob Danson
General Manager

cc: Olympic View Water & Sewer Board of Commissioners, Judi Gladstone, Washington State Association of Sewer and Water Districts