

Judi Gladstone

March 2, 2023

Mr. Mark Gordon, Environmental Engineer
WA State Department of Ecology

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

Dear Mr. Gordon:

Thank you for this opportunity to comment on the Draft PFAS Guidance for Investigating and Remediating PFAS Contamination in Washington state. The Washington Association of Sewer and Water Districts represents more than 180 public sewer and water districts in the state, serving nearly 25% of our state's population. These districts provide cost-effective sewer and water services ranging from the state's largest population centers, to the smallest rural communities. Clean water is a major concern to both our membership and the customers they serve.

The potential for contamination is always a concern, especially since beyond our wellheads and collection points we have no control over what is sprayed, injected, discharged or built near our facilities. The situation with PFAS is especially alarming given the longevity and ease of travel of these compounds. For these reasons, we understand the urgency to have standards in place. However, with EPA on the cusp of releasing new standards, would it not be best to wait to utilize those, and not go back through this process to establish new values? It could amount to a considerable expense to plan and implement a cleanup for one standard, only to have a more restrictive standard implemented during or after the cleanup has commenced. That being said, we offer the following comments on the content of the guidance.

This document presents itself as guidance, yet it does not contain the procedures and steps needed to prepare and implement a clean-up plan. It does give detail on how standards were derived under MTCA regulations, but does not go into the more practical aspects of how to approach a planning effort, followed by actual clean-up. To be helpful to municipalities facing this kind of effort, more actual guidance is needed for planning, preparation, implementation and techniques for disposal and destruction of PFAS contaminated matrices.

We appreciate the recognition of the need for protecting groundwater drinking water sources as presented in the statement on page 16, 3.2.3 which states "MTCA groundwater cleanup levels for PFAS chemicals discussed in this section are based on the assumption that the highest beneficial use and the reasonable maximum exposure at the site is the ingestion of groundwater as a current or potential potable drinking water source". Too often, surface water protection is emphasized due to the presence of aquatic life at the expense of groundwater sources. Yet, as we all know, groundwater also contributes to flows in rivers, lakes and streams.

Utilizing the State Action Limits established by the Department of Health to determine preliminary

clean up levels instead of the MTCRA regulation methodologies to calculate cleanup levels provides some consistency for protecting drinking water sources. We fully realize, however, that these limits will change as EPA continues with its investigations and sets new standards.

Discussion of new Environmental Site Assessment Standards on page 34, section 4.5.1 is a good wake-up call to jurisdictions as it relates to source control of PFAS. Carefully looking at trade and generic names and descriptions in manufacturing to identify PFAS chemicals serves as a reminder to municipalities when issuing construction permits to look at the proposed materials used to construct buildings, to head off problems related to stormwater discharges in the future. This is important to protecting drinking water groundwater sources and would be beneficial to also include in the NPDES Municipal Stormwater Permits which are being drafted now.

In Chapter 5, Protective Concentrations for Ecological Receptors, it is indicated that there is not enough data locally to use for calculations, so it is based on a literature review (and for soil biota, only earthworms). Does this indicate that local conditions could allow for the ability to set site specific limits on upland contaminated sites? Under what circumstances could this be allowed?

There is no mention of biosolids in this document (and only one of sludge, in the Treatment section). Use of biosolids as a beneficial soil amendment is utilized by many utilities across the state, and the potential for contamination and cleanup of PFAS is of great concern to the public, utilities, and those that currently benefit from the use of biosolids as fertilizer. Will these cleanup values preclude use of biosolids as a beneficial resource? Will all biosolids need to be incorporated into the soil rather than sprayed? It seems that much more data is needed, and perhaps advisory committees from the wastewater industry need to be formed to determine a path forward that continues beneficial use of biosolids while reassuring the public that food and water sources will not be contaminated by these applications.

The Treatment section also mentions soil washing. We are concerned about where the water containing the PFAS compounds would be disposed of. Sending that to wastewater facilities would potentially end up in biosolids that are an important tool for managing byproducts of treatment plants. PFAS source control is important for wastewater facilities as well, especially until viable techniques for the destruction of PFAS have been developed.

More detailed comments have been submitted by one of our member agencies, Sammamish Plateau Sewer and Water. They and their consultants have done a thorough analysis of the draft guidance document. We concur with the comments they have submitted.

Thank you once again for the opportunity to comment on these guidelines and limits.

Sincerely,
Judi Gladstone
WASWD Executive Director



**Washington Association
of Sewer & Water Districts**

EDUCATE ■ ADVOCATE ■ COLLABORATE

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