



# Local Hazardous Waste Management Program

*Serving Seattle, King County, Cities, and Tribes throughout King County*

## King County

Solid Waste Division

Water and Land  
Resources Division

## Public Health

Seattle and King County

## Seattle

Public Utilities

## Sound Cities Association

## Participating Cities and Tribes:

Algona  
Auburn  
Beaux Arts  
Bellevue  
Black Diamond  
Bothell  
Burien  
Carnation  
Clyde Hill  
Covington  
Des Moines  
Duvall  
Enumclaw  
Federal Way  
Hunts Point  
Issaquah  
Kenmore  
Kent  
Kirkland  
Lake Forest Park  
Maple Valley  
Medina  
Mercer Island  
Muckleshoot Tribe  
Newcastle  
Normandy Park  
North Bend  
Pacific  
Redmond  
Renton  
Sammamish  
SeaTac  
Shoreline  
Skykomish  
Snoqualmie  
Snoqualmie Tribe  
Tukwila  
Woodinville  
Yarrow Point

December 12, 2017

Kara Steward  
Hazardous Waste and Toxics Reduction Program  
Washington State Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504-7600

RE: Interim PFAS Chemical Action Plan

Dear Ms. Steward:

Thank you for the opportunity to comment on the Washington State Department of Ecology (Ecology) proposed Interim Chemical Action Plan (CAP) for per- and poly-fluorinated alkyl substances (PFAS). PFAS is an ubiquitous, persistent, bioaccumulative class of chemicals that poses risks to human health and the environment. I applaud Ecology for taking on this important issue.

The Local Hazardous Waste Management Program in King County (LHWMP) is a multi-jurisdictional program that works to protect and enhance public health and environmental quality in King County. We do this by reducing the threat posed by the production, use, storage, and disposal of hazardous materials. LHWMP provides services to 1.9 million residents and 60,000 businesses throughout King County, the most populous county in the state. LHWMP coalition members include King County, the City of Seattle, suburban cities within King County, and tribes.

**LHWMP's overall comments on Ecology's CAP** include the following:

- **All PFAS** (including but not limited to long-chain, short-chain, and fluoropolymers) should be covered under the scope of this CAP. While the problems initially focused on PFOS, it is important to include PFAS that are similar to PFOS, degradation products, and PFAS that are being used as alternatives in order that Ecology can focus on truly safer alternatives.
- We want to seek specific solutions for **safer alternatives** instead of "regrettable solutions."
- We want to ensure that impacts of PFAS and solutions to address it are considered through a **lens of equity and social justice**. Some examples of disproportionate impacts from PFAS on vulnerable communities include the following:
  - Fast food wrappers are disproportionately prevalent in low-income communities. (Parts of lower income south King County have five to

seven times more fast food restaurants and convenience stores available than grocery stores and produce vendors, compared to 2.5 times in other parts of the County.)

- Subsistence fishers rely on locally available fish food resources from PFAS-contaminated waters.
- Low-income communities are more likely to have legacy products such as old carpet, textiles, and cookware.

In addition, LHWMP wishes to offer the following **comments specific to the Interim CAP and Ecology's stated scope for it:**

- The Interim CAP should **recommend that PFAS be phased out of food-contact materials**. It should also recommend **research** into safer and effective alternatives, as well as **outreach** to businesses on preferred safer alternatives.
- LHWMP **supports a state drinking water level** and applauds Washington State Department of Health for undertaking that work.
- If the intent of the Interim CAP is to support an **alternatives assessment of AFFF**, the document should include additional information to support the need for one (explain how much PFAS is found in firefighting foam currently in use in Washington; information about existence of safer alternatives). This includes information that is available on PFAS or other chemicals that are currently used instead of PFOS, including amounts, chemical and hazard characteristics, and potential exposure. The Regulations Chapter should mention the **ban on PFOS/PFOA in AFFF in Australia** (Queensland and South Australia).
- The Interim CAP is not yet a cohesive document with the different chapters supporting each other and the overall recommendations. It should be further **edited for consistency** of information.
- LHWMP expects to have **more specific input during the full CAP** for 2018. Our program's mission intersects with the issues expected to be covered in that document (food wrappers, carpet, solid waste, etc.). We look forward to more information on which uses are the most problematic and which upstream actions will be the most effective to protect the people and environment of King County.

Please contact Erika Kinno, an LHWMP Policy Liaison, at [erika.kinno@kingcounty.gov](mailto:erika.kinno@kingcounty.gov) or 206-477-0942 for further information about our comments or the LHWMP program.

Thank you for considering these comments that aim to further strengthen Ecology's proposed Interim PFAS CAP.

Sincerely,



Lynda Ransley  
Program Director  
Local Hazardous Waste Management Program in King County