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September 9, 2026

NYS Department of Environmental Conservation
ATTN: Rebecca Vaughan
625 Broadway
Albany, NY 12233-7260

RE: Proposed Part 360 Series – Landfill Leachate Regulations

Dear Ms. Vaughan,

Thank you for the opportunity to comment on the proposed regulations governing PFAS treatment of leachate from landfills. The Cayuga Lake Watershed Network (CLWN) is an independent nonprofit organization supported by over 400 members. Our mission is to advocate for the health of Cayuga Lake and its 860 square mile watershed, and our programs promote science-backed community education and engagement. We advocate for robust environmental policies, collaborating with government agencies and engaging with the wide range of stakeholders in our community to develop science-based solutions to environmental challenges in the watershed. Cayuga Lake is used for drinking water by thousands of New Yorkers and is used to sustain a vibrant rural economy that includes diverse agricultural resources. Cayuga Lake is also a part of the Southeastern Lake Ontario watershed.

CLWN appreciates the Department & Governor Hochul taking steps to protect New York's waters by seeking to continue to address pervasive pollution that threatens the health & safety of New Yorkers, our communities, watersheds, and wildlife.

The proposed regulations are an important first step in addressing the gap in treatment for PFAS and recognizing that the burden of treatment should not be exclusively on the wastewater treatment facilities.

As wastewater treatment facilities are upgraded to include additional pollution controls, CLWN supports shifting the burden of that treatment to the polluting entity. In this case, the landfills sending the leachate to the wastewater treatment facilities.

CLWN is concerned about potential gaps in the regulations, which appear to leave some contaminates outside the scope of these regulations.

CLWN strongly encourages the DEC to strengthen these regulations by explicitly broadening the scope of their applicability to include facilities such as (but not limited to):

1. Closed landfills – all landfills that produce leachate should be required to treat that leachate, regardless of if it is actively accepting waste.
2. Leachate produced out of state and shipped into New York for processing. All leachate should be treated at the source before it is sent to New York.

And finally, CLWN is concerned that the proposed treatment standards do not adequately address the scope of the pollutant. There is no known safe level of exposure to PFAS and CLWN strongly encourages the DEC to strengthen the requirements around leachate treatment to require the removal of all possible PFAS from the landfill leachate. Wastewater treatment facilities often discharge into waterbodies that are also used as drinking water supplies. In order to protect one of New York's most precious resources, CLWN strongly encourages the DEC to impose standards for PFAS that would reflect the protection of drinking water sources not just a pollution limit for water bodies.

Thank you for your time and consideration of our comments. We look forward to the final rule and robust implementation of these regulations to guard New Yorkers and their waters from these pervasive chemicals.

Sincerely,



Liz Kretinger
Executive Director/Steward
Cayuga Lake Watershed Network