

# Monica Lowney

July 12th, 2021

Dear Department of Ecology  
c/o Kyle Dorsey and Emily Kjowski,

I am submitting this written response as a public comment pertaining to Ecology's permit application process for sewage sludge, aka; bio solids.

I concur with everything Darlene Schanfeld has stated in the two Sierra Club letters she submitted dated July 10th and July 11th 2021. I agree with the current positions Sierra Club holds. I am also a member of the Toxics Committee with Sierra Club. We have been studying the negative impacts on both human and environmental health for quite some time in relation to sewage sludge. Many studies already exist. In light of not repeating what Darlene has already shared, I will touch on a few other areas of concern and make suggestions. I have been a community advocate for the environment for 30 years.

I have grave concerns with the long term environmental and health impacts due to the spread of sewage sludge which has been proven to contain many hazardous chemicals. The exposure limits on children are far greater than adults. The contamination of our ground water in addition to the foods we consume from farmland contaminated with sewage sludge is immeasurable. We need to work together as a state to find alternatives to treating this sludge with modern technologies to reduce contamination.

These newer methods will be costly, yet the health of humans, our environment, aqua life and wildlife are worth protecting. In essence I believe current methods resort to our literally poisoning ourselves and these current methods must be altered. Instead of pointing out all of the obvious chemicals contained in sewage sludge, I prefer to present alternative solutions in a proactive manner. This is what I believe needs to be enforced by your agency. I understand the legislature will need to agree and state funding will need to be provided to make this possible, yet let's not give up there.

First, the legislature needs to set aside monies for a through investigation on cumulative health impacts related to the spread of sewage sludge. We need to protect our ground water in addition to our waterways as explained in the Sierra Club letters. I would like to see DOE and DHS work together to determine the impacts and chemicals contained in this waste from a toxicology standpoint. Secondly, I would like DOE to change the classification from bio solids to a hazardous waste. If sewage sludge contains chemicals and RCRA wastes, why would it not be classified as hazardous waste?

I believe the state should fund construction of modern regional treatment and disposal facilities that can properly dispose of the sewage sludge, funded and monitored by the state. Municipalities should have to pay fees to their regional facility to dispose of their sewage sludge waste. This would assist in the operation and maintenance costs of operating such facilities for the long term. It would be equitable and fair for communities to pay by the load based on their jurisdiction and population. This would allow smaller municipalities to participate in equal methods of disposal. It is unrealistic

to expect small communities to construct their own modern treatment facilities, this would be too costly. Railroads should be utilized opposed to trucks whenever possible to reduce carbon emissions and preservation of our highways and roads.

If sewage sludge was temporarily contained in landfills (Hanford) until these modern facilities are built, it could be later extracted from the contained landfill and trucked to the facilities, later being processed in an environmental manner. Certainly not to be left in the landfill for the long term of course. This is far better than spreading it on land. Once a farmer tills his soil with sewage sludge it is near impossible to mitigate it. In addition to spreading in in forests and sloped areas which can travel to other water sources both above and below ground. temporarily containing the sewage sludge is key to saving our environment. We cannot afford to risk the environment with our current practice for five more years. Municipalities should be paying for temporarily landfilling their sewage sludge until it can be extracted and processed properly.

Regarding the permit, I would urge you to not consider issuing a DNR (Determination of Non Significance) regarding environmental impacts. Instead I would like to see a full Environmental Impact Study be performed. I would like to see your toxicology department monitor the cumulative impacts on humans, children and the environment, including our rivers and ground water. This study should be funded through the legislature.

I believe it is environmentally unjust to continue to allow King County and other municipalities to use Central and Eastern WA as a dumping ground of sewage sludge. This is environmentally and socially unfair to economically disadvantaged areas. Clearly, King County being a much wealthier county compared to Yakima for example, can afford alternative methods of disposal. However, until they are regulated and required to do so, the eastern part of our state will continue to be their inexpensive method of disposal. This is not a equitable solution we should permit. This is environmentally unjust in my view. Counties should find alternative methods to treating their own sewage sludge opposed to dumping it on baron land as if they are doing eastern counties a service. They are actually contaminating land and water sources with this disposal method. Please stop allowing this practice immediately.

In addition I believe WA should not accept any sewage sludge from other states or Canada until we have a handle on this problem. If DOE would classify this as a hazardous waste, opposed to a bio solid, we could better inform the farmers and the public and prevent future contamination of land, water and food sources. Not to mention avoid numerous health related issues including cancer. I also believe food grown and sold in stores should be labeled as being exposed to sewage sludge if that indeed occurred. How else will the public know what they are consuming if labeling is not required by law?

I hope this makes sense and I understand that what I am explaining is a long and costly process. However, once land and water is contaminated it is very difficult and costly to restoring those natural resources back to their original condition. We live in a beautiful state and need to protect our natural resources. As climate change continues to heat up our state and less water becomes available, this will become even more important. Let's work together on proactive solutions before it is too late.

The online meeting I attended with Director Laura Watson today was a step in the right direction. Please realize there are many volunteers like myself who would like to assist you agency

in these efforts. Please let us know how we can be of assistance. Our passion for the environment and love of our state is proof of that. We are a wealth of knowledge and experience, therefore I hope you will tap into these resources to help solve a very big problem in our state. It truly does take a village, thank you for your time in reviewing my ideas and concerns. Please contact me if I can be of assistance and confirm via email that you have received this letter prior to the deadline tonight for submission.

Sincerely,

Monica Lowney

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