

Northwest Biosolids

December 29, 2020

Irina Makarow,
Department of Ecology, P.O. Box 47600,
Olympia, WA 98504

Dear Ms. Makarow,

Thank you for providing this opportunity to comment on practical Chemical Action Plan created to address PFAS chemicals.

Northwest Biosolids is a regional non-profit organization representing close to 140 public wastewater utilities (75%) and private companies (25%) across British Columbia, Alberta, Alaska, Idaho, Oregon, and Washington. Our organization has worked to advance environmental stewardship through the beneficial use of biosolids in the Pacific Northwest. Of the approximately 226,000 dry tons of biosolids generated in the region, nearly 90 percent of the biosolids are used in agriculture, forestry, land reclamation, and landscaping.

Since our incorporation in 1993, Northwest Biosolids has provided comments on regulations and guidelines, emphasizing the importance of setting standards that are based on science. Close to half of our annual budget is directed towards local universities to conduct research to evaluate practical and sustainable options for biosolids management

Northwest Biosolids would like to commend Ecology on the thorough and practical Chemical Action Plan created to address PFAS chemicals. Ecology's reliance on science and commitment to a measured process that employs appropriate analytical techniques, fate and transport models and risk assessment will move Washington toward reasonable and practical management of these troublesome chemicals. We believe Ecology's product stewardship approach is the most efficient and effective management strategy in addressing these persistent chemicals. Comments on specific sections follow below.

Section 2.1:

Analytical methods for PFOS must be determined before clean up levels can be established.

A thorough understanding of fate and transport is necessary in establishing clean up levels

We agree that an uncertainty analysis must accompany an eco-risk assessment

Section 2.3:

We agree that it is critical to investigate and mitigate industrial, military, and fire-fighting sites where levels of PFOA and PFOS, in particular, are very high in soils, groundwaters, and surface water due to historical contamination (these sites pose the greatest potential risks).

Section 3.0:

We agree that eliminating potential PFAS sources is critical in reducing negative environmental and human health impacts.

Section 3.1:

We strongly agree with recommendation 3.1 and suggest that a program subsidizing legacy carpet replacement in low income housing might be helpful.

Section 3.3

We agree with evaluating and potentially restricting priority consumer products

Section 4.1

What is advance solids removal?

Ecology needs to consider whether EPA has developed analytical methods for PFAS suitable for biosolids

Ecology should work with local Industrial Pretreatment Programs to identify sources of PFAS in POTW influent

A recent report was released, Cost Analysis of the Impacts on Municipal Utilities and Biosolids Management to Address PFAS Contamination, that is supplemental to the impacts to municipal wastewater programs - <https://www.nebiosolids.org/pfas-cost-impacts-study-news-nov2020>

Section 4.5

We commend Ecology on this measured and grounded approach and look forward to working with Ecology in collecting data and providing information on land application procedures and processes.

Biosolids (Appendix 8)

We appreciate that Ecology recognizes that "The lack of potential industrial contamination in Washington means negative impacts from land application of Washington biosolids is unlikely." We also agree that adoption of extremely low regulatory limits for soil PFAS could have adverse impacts on residuals recycling and may not deliver demonstrable risk reduction for human health and the environment. The following sentence accurately recognizes biosolids as a conveyor, "In general, the chemistry of biosolids is reflective of the chemistry of our daily lives as is the dust in our homes."

Thank you again for this opportunity to comment.

Sincerely,

Maile Lono-Batura
Executive Director, Northwest Biosolids



NORTHWEST BIOSOLIDS

Unearthing Sustainable Solutions

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Gig Harbor, WA 98332
Phone: 206-471-0460

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Sincerely,

A handwritten signature in black ink, appearing to read 'Maile Lono-Batura', with a stylized, cursive script.

Maile Lono-Batura
Executive Director, Northwest Biosolids