



Washington Association of Sewer & Water Districts

EDUCATE ■ ADVOCATE ■ COLLABORATE

June 14, 2023

Department of Ecology

[Ecology's Phthalates Action Plan \(commentinput.com\)](https://commentinput.com)

RE: CORRECTED Comments on Phthalates Action Plan

The Washington Association of Sewer and Water Districts (WASWD) appreciates the opportunity to comment on the proposed Phthalates Action Plan. WASWD 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 clients 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 proximal to our facilities.

In reviewing the plan, we are disturbed by some of the language contained in the Biosolids section. In this section, conclusive statements are shortly followed by statements about available science that casts uncertainty on preceding and subsequent conclusive statements. Starting on page 65, the first sentence states "Biosolids from composting and wastewater treatment plants (WWTPs) can serve as continued sources of phthalate emissions into the environment and pose a risk to human health." This very definitive statement is followed by another at the end of the same paragraph, stating "Scientists have not conducted studies characterizing the lifecycle of phthalates through the WWTP process, the land application of biosolids, uptake into crops, or composted biosolids in Washington state." This is followed by "However, it is possible that biosolids contain phthalates resulting from pre-WWTP sources (King County, 2021)." A little later in the section is the statement "Phthalates will biodegrade in WWTPs, and biodegradation rates are dependent on treatment conditions, such as oxygen levels, microorganisms, and temperature." These statements taken together (with emphasis added) really indicate that the state of the science and risk to human health from biosolids potentially containing phthalates is not well established. That renders the first sentence speculative and unsupported by facts, and it should be removed completely as it is alarmist and inaccurate.

In general, there is really no proper context for land application of biosolids presented in this document. There needs to be a lot more attention paid to the magnitude of the problem related to their manufacture. If there were less phthalates produced and used, there would be less in biosolids. Biosolids are applied to a very very small percentage of agricultural lands in any year, thus the magnitude of the problem of phthalates in biosolids is miniscule compared to exposure via everyday activities at work and in the home. The plan overall gives other sources of phthalates and needs to be sure that biosolids is presented in context, conveying the

appropriate magnitude of the impact of phthalates from biosolids. In looking at the paragraph above, this section needs to be reworked, and alarmist language removed.

There is also a need to broaden the scope of phthalates as they may appear in agriculture, not just land-applied biosolids. The potential for phthalates to be associated with seeds, fertilizers, and pesticides are very real, depending on coatings, application methods and storage of these items. Irrigation water should also be examined. As with PFAS and PCB compounds, it has been surprising where these have been found once you look for them.

The proposed recommendations related to biosolids get down to the crux of the matter in calling for more studies on transport and breakdown, partitioning to water and soil, evaluating plant uptake, and evaluating fate of compounds in composted biosolids. We agree with these recommendations. More studies are needed before making the conclusive statements currently in the document.

The section on Drinking Water is a testament to the hard-working professionals in the water treatment business, with sampling for certain phthalates since 1993 indicating no confirmed MCL violations for phthalates in public drinking water sources. We agree with the recommendations to keep monitoring in compliance with EPA and DOH standards, and for education on proper sampling to avoid inadvertent contamination. We also agree with the three year review of recommendations and implementation. This can provide an update on necessary studies, and will provide feedback on the impact of programs like medical equipment change-out, personal care product formulation changes, food packaging changes and replacement of the myriad other products containing phthalates.

Thank you for your attention to these comments.

Sincerely,



Judi Gladstone
Executive Director