

The Coalition for Clean Water

These comments are submitted on behalf of the Coalition for Clean Water. Our members provide wastewater treatment to many of Washington's citizens across the state. Member agencies include the cities of Bremerton, Everett, Seattle, Lynnwood, Tacoma, Vancouver, and Spokane; Pierce, King, and Spokane counties; and the Lakehaven Water and Sewer District in south King County, LOTT Clean Water Alliance (Thurston County), and the Discovery Clean Water Alliance (Clark County).

We thank the Departments of Ecology and Health, other state agencies, and members of the advisory committee for their efforts in producing the draft CAP. Developing a CAP is a challenging task. Many details will need to be worked out as individual recommendations are implemented.

The plan presents a clear picture:

- Phthalates are ubiquitous in the manufacturing of products, the environment, and our lives.
- The primary source of exposure for people is ingestion, mostly from food and water; house dust is an important pathway of exposure for children.
- Phthalates degrade relatively quickly in the environment and in our bodies but their broad presence in manufactured products means they are constantly released to the environment, and we are constantly exposed.

The plan anticipates that lead agencies will prioritize the implementation of recommendations with input from stakeholders. We support Safer Products for Washington and efforts to find alternative and less hazardous substitutes for phthalates and other substances that are determined to pose a risk to health or the environment. Wastewater treatment plants (and biosolids) are passive receivers of phthalates from other sources. We ask that Ecology focus its greatest effort on curtailing the true sources of phthalates by working with manufacturers to find better alternatives, and with consumers to change purchasing habits. If the use of phthalates is reduced, a corresponding reduction will be seen in biosolids and wastewater influent and effluent, as has been the case with other substances of concern.

The plan places biosolids and wastewater in the category of Solid Waste Media. Under state law in RCW 70A.226, biosolids are a valuable commodity and are explicitly not solid waste. We ask that you separate wastewater and biosolids from the management of solid wastes, which by law and rule appropriately include compost facilities, recycling products and packaging, and landfills.

The plan offers positive observations about biosolids, but also characterizes them as a source of phthalates and a threat, on some level, to human health and the environment. Perspective is important. Food contamination comes from many sources, the most significant of which have nothing to do with biosolids. Croplands treated with biosolids are less than 0.1 percent of Washington's total land area and perhaps 0.2 percent of agricultural land. Biosolids are used in many applications that do not include food crops, including the reclamation of disturbed and contaminated sites, growing timber, and the product of fiber for pulp. Most biosolids are not handled with bare hands (if at all), and plant uptake is only one component of many complex pathways involved in exposure and risk assessment. Biosolids permit criteria address surface water

and groundwater, as well as soil types, slopes, rainfall, method of application, and other considerations.

Ecology needs to expand the scope of its consideration for inputs of phthalates in agricultural settings. Other potential sources of phthalates include commercial fertilizers and pesticides, products designed to enhance soil water retention, and product packaging.

The first bullet under Recommendation 1 of the Solid Waste Media Recommendations section should include composting biosolids as a method of treatment to be assessed. In Recommendations 2 and 3, Ecology says it will need to work with farmers to plan and coordinate sampling efforts for crops/fodder grown on biosolid-amended soil. Biosolids generators have carefully cultivated working relationships with farmers and other users over many years and have a very large investment in those relationships. We ask that Ecology approach this as working with both users and producers.

We note that area universities are omitted as partners in research, yet both the University of Washington and Washington State University have done significant research on biosolids beneficial use and stormwater analysis. Ecology should take advantage of that expertise.

Thank you for taking the time to consider our comments and recommendations. Respectfully and on behalf of the members of the Coalition for Clean Water,

Kyle Dorsey
Executive Director