



City of Tacoma  
Environmental Services Department

June 28, 2021

Washington State Department of Ecology  
Kyle Dorsey  
PO Box 47600  
Olympia, WA 98504-7600

**Subject: Statewide General Permit For Biosolids Management**

Dear Mr. Dorsey:

The City of Tacoma Environmental Services Department appreciates the opportunity to comment on the Department of Ecology's (Ecology) Statewide General Permit For Biosolids Management. The City of Tacoma operates two wastewater treatment facilities. The North End Treatment Plant #3 is a 7.2 MGD plant that sends all of its sludge to another facility (Tacoma Central Treatment Plant #1) for further processing. Our Central Treatment Plant produces approximately 7,000 dry tons of biosolids every year. Over 85% of our biosolids are sold as second-generation biosolids products.

We appreciate Ecology's reorganization of the permit. Creating a baseline section that applies to all permittees and a specialized section that apply to active septage management and to active biosolids management makes the permit easier to follow. This approach more accurately conveys the difference between septage management and biosolids management to permittees and to the public.

We also commend Ecology on the "Automatic Coverage for Some Facilities" provision in Section 2.1.2. This will reduce the burden on small facilities (including or North End Treatment Plant #3) that are not actively managing biosolids without compromising the environmental and health protection this permit provides.

The concept of second-generation Biosolids products is new and needs to be more carefully defined. We agree with the concept that products made from Class A-EQ (Exceptional Quality) biosolids do not need to be further regulated, but suggest that the point of compliance be specifically defined.

The following are specific comments on sections of the permit and Fact Sheet:

**1.2.3. Active Biosolids Management Section**

Section (4) of this permit applies to facilities with active biosolids management programs, but not those ~~than~~ that manage only septage (1.2.2 above).

**2.1. Understanding and Complying with the Permit System**

Figure 1 – This flow chart outlines the application process.

Existing Baseline facilities without active programs are automatically covered on the effective date of the general permit. To confirm your **coverage**, consult the Facility List provided by Ecology.

#### 4.4.4. Frequency of Biosolids Analysis

The dry weight tonnage of biosolids applied to the land or prepared for sale/give away per 365-day period determines the minimum frequency of biosolids analysis (Table B1 below). **Table B1 should explicitly say in the table that the tonnage units are dry tons.**

#### Table B5: Additional Site Management Restrictions for Class B Biosolids

**Table B5 lists buffer distances for adjacent properties “as defined by Ecology” Does Ecology have guidelines for how property buffers are to be determined? If so this guidance should be cited here.**

#### 4.6. Exceptional Quality Biosolids

This permit does not regulate *second-generation EQ biosolids* products. Once the biosolids component of the second-generation product meets the Exceptional Quality Class A requirements of the Rule the second Generation products manufactured from the biosolids component are no longer regulated under this Permit. The Facilities that manufacture second-generation exceptional quality biosolids products must ensure physical separation of those products from first-generation exceptional quality biosolids.

#### Appendix D - Glossary of Terms

**Second-generation exceptional quality biosolids products:** Products made from biosolids that have met the requirements for Class A exceptional Quality Biosolids. These products include blended soils composts and potting soils.

#### Fact Sheet

#### Commitment to Environmental Justice

Tacoma has recently been investigating biosolids from an equity standpoint. Our view is biosolids are a valuable resource that benefits the user (customer). Our focus has been on how to make sure that all people have access to the benefits of our products. We would suggest that Environmental Justice must look at equitably distributing the value of biosolids and the biosolids manufacturing process as well as making sure no group of people bears a disproportionate burden of harms or risks.

Thank you for this opportunity to comment on the Statewide General Permit For Biosolids Management. We trust our comments are useful. If you have any questions or would like additional information, please contact Dan Thompson at 253.502.2191 or at [dthomps@cityoftacoma.org](mailto:dthomps@cityoftacoma.org)

Respectfully,

*Dan C. Thompson, Ph.D.*

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Business Operations Division Manager  
Tacoma Environmental Services

CC: Michael P. Slevin III, P.E., Environmental Service Director