June 30, 2021

Re: Biosolids

Washington State Department of Ecology

To Whom it may Concern,

On Behalf of Far West Agribusiness Association and the Washington State Fertilizer Advisory Committee, we would like to address the issue of Biosolids and their application to farm ground.

The question that arose is why are Biosolids not considered a commercial fertilizer and regulated in the same manner as commercial fertilizers? In your draft statement, you clearly state :

“Biosolids are the organic matter left over after domestic or municipal sewage is treated at a wastewater treatment plant or septage management facility. Once processed, they are land applied and used to grow crops like wheat, corn, grass, hay, and hops.”

And in another document you state:

“Biosolids are an important source of soil nutrients for farmers and land managers. Farming and other activities remove nutrients from the soil. Biosolids provide nutrients when used on farms and forestlands, in manufactured compost, and topsoil and fertilizer products.”

In the RCW 15.54.270, the definition of a fertilizer is stated:

“(4) "Commercial fertilizer" means a substance containing one or more recognized plant nutrients and that is used for its plant nutrient content or that is designated for use or claimed to have value in promoting plant growth, and shall include limes, gypsum, and manipulated animal and vegetable manures…”

We would like to have you address including Biosolids into the category of fertilizers and be regulated by way of applicable fees, registrations, tonnage taxes etc. as fertilizers.

Regards,

See the attached sheet of supporters of this letter.

Margaret Jensen Jay Geisinger

Executive Director Ag Enterprise

Far West Agribusiness Association

Kyle Hartmeier John Merkel

Verdesian Life Sciences Ag Link

Jill Sandnes Todd Kisler

Chamberlin Ag Simplot

Mathias Gargus Washington State Fertilizer Advisory Committee