



July 1, 2021

Kyle Dorsey  
State Biosolids Program Coordinator  
Statewide Resources Section  
Solid Waste Management  
Washington State Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504-7600

Submitted Online

RE: **Statewide General Permit for Biosolids Management  
Public Comments from Discovery Clean Water Alliance**

Dear Mr. Dorsey:

The Discovery Clean Water Alliance (Alliance) is providing written comment for the Statewide General Permit for Biosolids Management published by the Washington State Department of Ecology (Ecology) on May 5, 2021. The Alliance is a regional wastewater transmission and treatment utility serving the central portions of Clark County, WA. The Alliance partner agencies collectively represent approximately 123,000 residents, and the Alliance owns and operates the largest wastewater treatment facility in Southwest Washington with a biosolids land application program, the Salmon Creek Wastewater Treatment Plant (NPDES Permit No. WA0023639). The Alliance strives to safeguard the health of both the community and the natural environment, while at the same time fostering a prosperous economy.

The Statewide General Permit for Biosolids Management is an important Ecology responsibility, and we thank Ecology for its efforts for your continual improvement of these regulations. After review of the recently published permit and coordination with the Northwest Biosolids group, the Alliance is providing the following comments for consideration.

The Alliance strongly supports continual improvement of regulations such as these. It is critical that regulations keep pace with technology and science-based research to ensure that agencies can continue to implement their biosolids programs in a responsible and efficient manner.

Ecology's development of the permit appears to be well-organized and straightforward for staff to navigate. The separation of sections that apply to all permittees (a baseline section) and then a specialized section for active septage management and for active biosolids management is helpful. This new approach provides clear direction to staff managing these programs how to meet the requirements and compliance standards.

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Alliance strongly supports the "Automatic Coverage for Some Facilities" provision (Section 2.1.2). Ecology's approach here addresses the potential compliance burden(s) on many small facilities while also retaining a high degree of public health and environmental protection requirements that should be expected from the applicable permittees.

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.

In addition to the above comments, the Alliance has reviewed and agrees with the comments submitted by NW Biosolids, particularly those related to Section 4.6, Table B5, and Appendix D which may have a direct impact to the SCTP biosolids program now and with planned program advances in the future.

We appreciate the opportunity to comment on the recently published permit. We further acknowledge the work of Ecology staff in updating this important permit which allows the Alliance to continue its biosolids program in an environmentally responsible and cost-effective manner. If you have any questions or would like additional information, please contact me at 360.993.8819 or [jpeterson@crwwd.com](mailto:jpeterson@crwwd.com).

Sincerely,



John M. Peterson, PE  
Executive Director  
Discovery Clean Water Alliance