Northwest Biosolids

Please see the attached comment letter with proposed revisions to the biosolids management permit from our membership, Regulations Committee and Board of Directors. We appreciate the opportunity and the work you are doing!

NORTHWEST BIOSOLIDS
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June 29, 2021

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

Subject: Statewide General Permit For Biosolids Management

Northwest Biosolids appreciates the opportunity to comment on the Department of Ecology's (Ecology) Statewide General Permit For Biosolids Management. Northwest Biosolids is a regional non-profit organization representing close to 140 members, including public wastewater utilities (75%) and private companies (25%) across British Columbia, Alberta, Alaska, Idaho, Oregon, and Washington. Our organization has worked to advance environmental stewardship through extensive research and the beneficial use of biosolids in the Pacific Northwest for almost 30 years. Of the approximately 226,000 dry tons of biosolids generated in our region, nearly 90 percent of the biosolids are used in agriculture, forestry, land reclamation, and landscaping.

Since our incorporation in 1993, Northwest Biosolids has provided comments and inputs on regulations and guidelines, emphasizing the importance of setting standards that are based on science and research. Close to half of our annual budget is directed towards local universities to conduct technical studies to evaluate practical and sustainable options for biosolids management. We strongly support and advocate for continual improvement of regulations such as this General Permit. As time passes, it is critical that regulations keep pace with technology and science-backed research.

Northwest Biosolids appreciates Ecology's reorganization of the permit. Creating a baseline section that applies to all permittees and specialized sections 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.

Northwest Biosolids also commends Ecology on the "Automatic Coverage for Some Facilities" provision in section 2.1.2. This will reduce the burden on small facilities that are not actively managing biosolids without compromising the environmental and health protection this permit provides.

Northwest Biosolids finds Ecology's development of the permit to be very organized and user-friendly. 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 allows users an easy format to follow, understand, and comply with. Ecology's new approach conveys to both the public and permittees the clear difference between septage and biosolids management requirements and compliance standards.

Northwest Biosolids commends Ecology's for the "Automatic Coverage for Some Facilities" provision (Section 2.1.2). Ecology has taken a very prudent approach in understanding the potential compliance burden(s) on many small facilities. This provision also maintains 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.

The following are specific comments on sections of the permit:

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.

4.6 Exceptional Quality Biosolids

Exceptional quality (EQ) biosolids have been treated to the highest regulatory standard and are not subject to further regulation once the standard has been met. Examples of EQ biosolids processes include thermal drying, lime pasteurization, temperature-phased (including thermophilic) anaerobic digestion, and auto-thermal aerobic digestion. Process controls and biosolids quality must be stringently documented.

Biosolids generated from these treatment processes may in some cases be made into second-generation products such as manufactured soil and compost. This permit does not regulate *second-generation EQ biosolids* products. Publicly-owned or private facilities that manufacture second-generation exceptional quality biosolids products must ensure separation of those products from first-generation exceptional quality biosolids. The separation between first and second-generation EQ biosolids products must be physically distinct, and ensure no possibility of mingling. Operators must be able to identify each product at all times.

All *first-generation exceptional quality biosolids products* must comply with the labelling and information sheet requirements of 4.6.1. If you guarantee a nutrient content, or represent your product as a commercial fertilizer, in addition to the requirements of this permit you may be subject to regulations implemented by (etc,etc)

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 this is so, guidance should be cited here.

Appendix D

First-generation exceptional quality (EQ) biosolids: Exceptional quality biosolids produced from the treatment of non-exceptional quality biosolids, and meeting all standards for Class A pathogen reduction, vector attraction reduction, and pollutant concentration. Standards must be met at the time EQ biosolids are distributed or made into a second-generation product.

Second-generation exceptional quality (EQ) biosolids products: Products that blend first-generation EQ biosolids with other materials to make products like manufactured soil or compost. Further monitoring and testing of second-generation products is not required.

Northwest Biosolids believes that by providing clarity and focus in this permit, the wastewater and private sectors will be able to more readily implement the necessary compliance programs to ensure a healthy and strong environment for our state citizens. Your willingness to take on this effort is very much appreciated.

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 dthompso@cityoftacoma.org

Sincerely,

Jim Dunbar, PE
President
Northwest Biosolids