

Zero Waste Washington

Please see attached

July 12, 2021



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SUBJECT: Washington 2021 General Permit for Biosolids Management

To Emily Kijowski and Kyle Dorsey:

Zero Waste Washington appreciates the opportunity to comment on the *Washington 2021 General Permit for Biosolids Management*, made public on May 18, 2021.

Zero Waste Washington is a nonprofit organization that represents the public on recycling and zero waste issues. We work to drive policy change for a healthy and waste-free world. We envision a just, equitable, and sustainable future where we all produce, consume, and reuse responsibly.

Regarding the land application of biosolids on agricultural fields, forest lands, and other locations, we are strongly concerned about per- and poly-fluoroalkyl substances (PFAS) and microplastics. Both of these contaminants tend to prefer the solids and thus are likely present in significant amounts in Washington's biosolids, based on evidence from elsewhere. They have the potential to adversely impact local waters and also impact air quality (traveling in dust and particulate).

We would like Ecology to take steps to reduce these contamination problems, both within this general permit and in other actions.

Specifically, we would like to see **monitoring requirements included in the permit for both contaminants**. At a minimum, at least once every five years, and ideally more frequently. The monitoring should occur both in the material before application and also at the application sites.

In addition, steps should be taken to begin to **limit these contaminants in the material**. Washington should be a national leader in helping reduce these two toxic contaminants.

Thank you for consideration of our comments. I can be reached at heather@zerowastewashington.org or (206) 441-1790.

Sincerely,

A handwritten signature in black ink, appearing to read "Heather Trim", written over a light blue horizontal line.

Heather Trim
Executive Director