

Far West Agribusiness Association

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 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 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,

Margaret Jensen

Executive Director

Far West Agribusiness Association

FirstName	LastName	Company	Email	Address01	City	State	Zip	SubmitDate	CommentValue
John	Merkel	Ag Link	johnm@aglink.biz	PO Box 77	Reardean	WA	99029-0077	6/30/2021	<p>Bio-Solids Questions & Comments.</p> <p>I would like to know about how much of any of the toxins that are in the Bio-Solids are being absorbed by the plant and entering our food supply</p> <p>I would like to know what are the long-term effects on our farmland, water wells, and environment from these applications?</p> <p>The application's are very poor. They are not uniform and are in "Blob's"</p> <p>Commercial Fertilizer is taxed to help fund the Washington State Department of Agriculture, Bio-Solids should be taxed the same since it is being applied as a fertilizer.</p> <p>As defined by RCW 15.54.270, BioSolids meet the definition of a fertilizer.</p> <p>http://app.leg.wa.gov/RCW/default.aspx?cite=15.54.270</p> <p>Fertilizer tonage and tax fees should be assessed by Washington State Department of Ag Fertilizer as wekk as product registration.</p> <p>It is being applied as a fertilizer, therefore should be held to the same guidelines as fertilizer</p> <p>Interesting that it meets the RCW for terms and definitions as a commercial fertilizer, not much different than compost, which included manure.</p> <p>I feel like any input that is monitored or measured during an application should be classified and regulated under the current categories of fertilizer/growth regulator/pesticide.</p> <p>It looks like they are competing with us in the fertilizer industry. I think they should have to register just like we do.</p> <p>We want to make sure that biosolids are held to the same rules and regulatory standards as the fertilizer industry.</p> <p>Biosolids contain the same nutrients and metals that are regulated for fertilizers and are land applied to soil and crops like commercial fertilizers (for the same purpose). As such, Biosolids should be subject to the same registration, labeling, testing, annual permit and tonnage fees that are required of the fertilizer industry. Differing regulations provide both unequal environmental protections and an unfair competitive advantage for biosolids.</p> <p>Furthermore, it is a conflict of interest for a government agency--as a regulating and rulemaking authority--to operate by different regulatory standards than entities that it oversees and competes with.</p>
Kyle	Hartmeier	Verdesian	kyle.hartmeier@vlsoci.com	PO Box 3453	Pasco	WA	99302-3453	6/30/2021	<p>Fertilizer tonage and tax fees should be assessed by Washington State Department of Ag Fertilizer as wekk as product registration.</p> <p>It is being applied as a fertilizer, therefore should be held to the same guidelines as fertilizer</p> <p>Interesting that it meets the RCW for terms and definitions as a commercial fertilizer, not much different than compost, which included manure.</p> <p>I feel like any input that is monitored or measured during an application should be classified and regulated under the current categories of fertilizer/growth regulator/pesticide.</p> <p>It looks like they are competing with us in the fertilizer industry. I think they should have to register just like we do.</p> <p>We want to make sure that biosolids are held to the same rules and regulatory standards as the fertilizer industry.</p> <p>Biosolids contain the same nutrients and metals that are regulated for fertilizers and are land applied to soil and crops like commercial fertilizers (for the same purpose). As such, Biosolids should be subject to the same registration, labeling, testing, annual permit and tonnage fees that are required of the fertilizer industry. Differing regulations provide both unequal environmental protections and an unfair competitive advantage for biosolids.</p> <p>Furthermore, it is a conflict of interest for a government agency--as a regulating and rulemaking authority--to operate by different regulatory standards than entities that it oversees and competes with.</p>
Mathias	Gargus		mathiasgargus@hotmail.com			WA		6/30/2021	<p>It looks like they are competing with us in the fertilizer industry. I think they should have to register just like we do.</p> <p>We want to make sure that biosolids are held to the same rules and regulatory standards as the fertilizer industry.</p> <p>Biosolids contain the same nutrients and metals that are regulated for fertilizers and are land applied to soil and crops like commercial fertilizers (for the same purpose). As such, Biosolids should be subject to the same registration, labeling, testing, annual permit and tonnage fees that are required of the fertilizer industry. Differing regulations provide both unequal environmental protections and an unfair competitive advantage for biosolids.</p> <p>Furthermore, it is a conflict of interest for a government agency--as a regulating and rulemaking authority--to operate by different regulatory standards than entities that it oversees and competes with.</p>
Todd	Kisler	Simplot	Todd.Kisler@simplot.com	591 S. Bruce Rd.	Othello	WA	99344	6/30/2021	<p>We want to make sure that biosolids are held to the same rules and regulatory standards as the fertilizer industry.</p> <p>Biosolids contain the same nutrients and metals that are regulated for fertilizers and are land applied to soil and crops like commercial fertilizers (for the same purpose). As such, Biosolids should be subject to the same registration, labeling, testing, annual permit and tonnage fees that are required of the fertilizer industry. Differing regulations provide both unequal environmental protections and an unfair competitive advantage for biosolids.</p> <p>Furthermore, it is a conflict of interest for a government agency--as a regulating and rulemaking authority--to operate by different regulatory standards than entities that it oversees and competes with.</p>
Jill	Sandnes	Chamberlain	jsandnes@chamberlinag.com	590 N. Chamberlin	East Wenatch	WA	98802	6/30/2021	<p>We want to make sure that biosolids are held to the same rules and regulatory standards as the fertilizer industry.</p> <p>Biosolids contain the same nutrients and metals that are regulated for fertilizers and are land applied to soil and crops like commercial fertilizers (for the same purpose). As such, Biosolids should be subject to the same registration, labeling, testing, annual permit and tonnage fees that are required of the fertilizer industry. Differing regulations provide both unequal environmental protections and an unfair competitive advantage for biosolids.</p> <p>Furthermore, it is a conflict of interest for a government agency--as a regulating and rulemaking authority--to operate by different regulatory standards than entities that it oversees and competes with.</p>

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Regards,

See the attached sheet of supporters of this letter.

FAR WEST

AGRIBUSINESS ASSOCIATION

Margaret Jensen
Executive Director
Far West Agribusiness Association

Jay Geisinger
Ag Enterprise

Kyle Hartmeier
Verdesian Life Sciences

John Merkel
Ag Link

Jill Sandnes
Chamberlin Ag

Todd Kisler
Simplot

Mathias Gargus

Washington State Fertilizer Advisory Committee