

TO Emily Kijowski, Ecology Solid Waste—emily.kijowski@ecy.wa.gov
Kyle Dorsey, Biosolids Coordinator, kyle.dorsey@ecy.wa.gov

FROM Constance Ibsen, citizen, 6500 E State Route 106, Union, ibsen@hcc.net

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SUBJECT **Need Full EIS for Statewide Biosolids General Permit—Withdraw DNS**

Although I am a member of Hood Canal Improvement Club, the Lower Hood Canal Watershed Coalition and the Mason County Onsite Septic Advisory Committee my comments below are solely my own. I have been involved in the biosolids issue and its possible contributions to surface, ground and marine waters since 1999. I present a timeline with actions and inactions on sewage sludge, septage, biosolids that stand out for me.

In 2000, *General Audit Report: Water Biosolids Management and Biosolids 2000-P-10, March 20, 2000* explained there is virtually no federal oversight of state biosolids programs in non-delegated states. Washington and many other states fall into this category.

In 2003, a watershed-coalition sponsored a discussion that included the biorecycling operator, septic pumpers, Mason County and Ecology staff. Ecology staff stated that the operator was a “model” for the state and meeting all permit requirements.

In 2004-2005, fish kills occurred in Lower Hood Canal and drove the establishment of the Low Dissolved Oxygen Program for Hood Canal which triggered an investigation on whether this biorecycling facility was a possible contributor to excess nitrogen to Hood Canal. Former Congressman Norm Dicks requested the EPA to look at possible water quality impacts from the septage/sludge land application site Biorecycling at Webb Hill in Mason County.

In 2006 Curt Black, EPA Region 10, Office of Environmental Assessment submitted *Issues Identified for the Biorecycling Site (Webb Hill Road) in Mason County for the Potential Loading of Nitrates and Other Contaminants to Hood Canal, March 30, 2006*. Ecology staff requested edits to this document to minimize the probable water quality impacts from this site. In an April 2007 cover letter accompanying the final report, Tom Eaton, Director of ;Washington Operations, EPA Region 10, makes recommendations for further monitoring to determine contaminants in neighboring drinking water wells and an “assessment of underlying soil how it relates to groundwater flow.”

In 2007, WRIA 16-14b planning group took up the possible contamination from this site. With funding from Ecology, Aspect Consulting prepared its September 6, 2007, Phase I report for the WRIA 16-14b group This report found nitrogen levels above federal and state drinking water standards in the first aquifer below the surface of the biosolids application site. Ecology staff ordered Biorecycling at Webb Hill to immediately cut its land application in half.

In 2009, Agreed Order Nbr. 6348 between Ecology SW and Biorecycling operator was signed. This legal document had no timetable, no benchmarks, no penalties. Through 2017, this operation has yet to achieve the appropriate agronomic rate as required in its permit. It is essential that an Agreed Order have some teeth to be enforceable.

May 17, 2012, Ecology staff gave a presentation to WRIA 16/14b watershed planning group and confirmed Curt Black’s , EPA, 2006 analysis that Biorecycling at Webb Hill Road drains to the Skokomish River, Hood Canal, and possibly Oakland Bay. and that 20% of the groundwater from this site drains to Hood Canal.

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November 15, 2018 Findings by the USEPA *Unable to Assess the Impact of hundreds of Unregulated Pollutants in Land-applied Biosolids on Human Health and the Environment*

On January 9, 2019, I submitted comments that the Statewide Biosolids General Permit **could** work. Now, my position that a full EIS is needed for these sewage/sludge/septage biosolids operations. If not now, when?

I attended the June 4, 2021, ZOOM Public Hearing for the General Permit which started off detailing how this new General Permit would improve communications between *Ecology and the permittees*.

In reviewing this timeline concerning possible impacts of biosolids, I would ask that Ecology look to improve communications with citizens. The ongoing obfuscation and dismissive tone that Ecology staff uses is very effective in discouraging concerned citizens from participating, making others angry and yielding distrust on everything that Ecology says on this issue. Ecology staff has stated that if Biorecycling was not in business in Mason County there would be more groundwater pollution as septic pumpers would off load septage in the woods and septic pumping costs would increase and households would not pump their septic systems when appropriate regardless of the fact that septage from septic tanks is under the jurisdiction of local health jurisdictions.

Ecology needs to be more transparent in its communications on risk assessment, scientific uncertainty, emerging new science, and possible technical solutions. Ecology needs to be more forward and holistic and look at the human waste stream and its impacts on all species, orcas, humans, birds, the food chain.... (When Mason County submitted its most recent solid waste plan update adding a section for Human Waste, Ecology responded that it was not necessary.)

A working advisory committee including scientists, tribes, federal, state and local agencies and elected officials, septic system providers and pumpers, operators of wastewater treatment plants and sewage/septage land application and biosolids, agriculture and aquaculture growers, legislators, Washington attorneys general, citizens in the watershed and look at the whole of the human waste stream. s.

A review of the existing knowledge is essential to understand the impacts of biosolids on communities and the environment. A full EIS for the general permit would inform the statewide the human waste committee planning.