

# Paula Shafransky

I am writing to comment on the Statewide General Permit for Biosolids Management. Please consider the following suggestions:

1. Update the three-decades-old regulations on which it bases permits to reflect current science: Testing must be done for PFAS, PCBs, pharmaceuticals, endocrine disruptors, and antibiotic resistant bacteria before spreading it on land and selling it as compost. This is extremely important.
2. Increase oversight and enforcement for when and where the sludge is spread.
3. Disallow the land spreading of septage and sludge within 200 feet of public and private wells, surface water bodies, and above critical aquifer recharge areas.
4. To avoid runoff, disallow spreading sludge during wet seasons of rain and snow.
5. Disallow the waste to be spread on ski slopes.
6. Permits should reflect the 2021 HEAL ACT.
7. Require that crops grown in this sewage waste and commercial composts be labeled as such.

Thank you for your consideration in this matter.