

Leigh Ost

As a resident of Lincoln County with a rental property in Spokane County, I offer the following.

As a citizen, I am very concerned that the quality of waste treatment in these two counties is currently below that necessary to capture and prevent heavy metals, pathogens, and such everyday products as sunscreen and cosmetics from polluting water and land areas within these two counties.

Evidence points to treatment plants nationally lacking the technology and facilities to prevent microfibers from entering surface waters after treatment, and I believe the same can be said of heavy metals, pathogens, and everyday products. The technology is too old-school to cope with these heightened threats to public health, not only in Washington, but in the United States, and certainly world wide.

Rather than concentrating on defining who can apply sludge to land, which can then migrate to aquifers, I believe the Department of Ecology could better work to identify and define methodology to assist treatment plants in the entire state to prevent the above pollutants from entering the food-producing chain. Very unsuitable sludge products are currently being applied on agricultural land which produces food and feed for livestock for consumption by the public.

What are the safeguards in place to prevent over-exposure of the public's food supply to heavy metals, pathogens, and advanced cosmetics? Are oversight procedures in place to ensure applicators have sludge products that are safe? Is there enough knowledgeable manpower available to judge the suitability of particular batches of sludge? Do applicators adhere rigorously to the regulations to ensure safety, or do they just apply the product as fast as possible to get on with the next application? I suspect what the answers are, what with budget constraints always in the picture. AND, who from DOE is watching applicators for compliance? Are they watching enough of the time?

As I'm sure most at the Department are aware, heavy metals are long-term threats to public health. Pathogens of all types are swift killers, yet these are present and available to food plants grown where sludge is applied. Are current safeguards enough? I suspect not.

Therefore, I would be in favor of a moratorium to granting new powers to applicators until new technologies can make sludge safer. The actively managed septage and biosolids applicators, who are in the business

for profit, need many more controls on the products they disburse than I see being required by the Department. Please understand that I am vitally concerned with applications to food-producing land and water.

Rather, please investigate ways to empower treatment plants to mitigate the damage to health caused by heavy metals, pathogens, and advanced cosmetic products. Maybe much better filters are the answer. I think this should be the thrust of the Department of Ecology's efforts for the environment and the people who have to live in it.

Thank you for this opportunity to comment.

Sincerely,
S. Leigh Ost, ostknoll@startmail.com