



King County

Department of Natural Resources and Parks
Wastewater Treatment Division

King Street Center, KSC-NR-5501
201 South Jackson Street
Seattle, WA 98104-3855

October 10, 2024

Torrie Shaul
Biosolids Technical Specialist
Washington Department of Ecology
PO Box 47600
Olympia, WA 98504-7600

RE: Draft General Permit for Biosolids Management - Determination of Non-Significance

Dear Ms. Shaul:

Thank you for the opportunity to comment on the Department of Ecology's (ECY) Determination of Non-Significance (DNS) for the draft Statewide Biosolids General Permit. We appreciate ECY's work to responsibly regulate biosolids land application in Washington state.

The King County Wastewater Treatment Division (WTD) serves nearly 2 million people within a 424 square mile service area including most urban areas of King County and parts of Snohomish and Pierce Counties. In 2023, our three regional treatment plants and two community plants treated a combined daily average of 182 million gallons of wastewater, and together produced over 124,000 wet tons of biosolids that were land applied to forests and farms in Washington as a beneficial soil amendment.


We concur with the DNS as issued. The DNS summarizes the benefits of biosolids land application, including decreasing greenhouse gas emissions, and the negative environmental impacts that would result from alternatives to land application. Land application returns valuable nutrients and carbon to the soil, avoids or reduces unnecessary production of commercial fertilizers, provides economic benefits to farmers and foresters, and boosts production of agricultural and forestry products. Application of biosolids also lowers our utility's carbon footprint and saves ratepayer dollars.

The DNS also highlights on-going research into contaminants, including PFAS, a topic of strong interest to King County and many other agencies. The DNS states that current biosolids land application practices are unlikely to constitute a major source of PFAS exposure for humans or the environment. We will continue to rely on science-based guidance to assess pollutant risks as we achieve our mission to protect public health and the environment.

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Thank you for the opportunity to comment on the DNS, and we look forward to implementing the Statewide Biosolids General Permit. If you have any questions or need more information, please contact WTD Policy and Research Supervisor Erika Kinno at 206-477-0942.

Sincerely,

Signed by:


Kamiron Guroi, Division Director
Wastewater Treatment Division
Department of Natural Resources and Parks