

October 18, 2024



**RIVERSIDE PARK  
WATER RECLAMATION FACILITY**  
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RE: SEPA Determination of Nonsignificance for the Draft Biosolids General Permit.

Thank you for the opportunity to submit comments on the State Environmental Policy Act Determination of Nonsignificance for the Draft Biosolids General Permit. The City of Spokane appreciates the efforts of Ecology in continuing to support the beneficial use of Biosolids.

The Riverside Park Water Reclamation Facility (RPWRF) provides tertiary wastewater treatment for approximately 250,000 residents in the City of Spokane and Spokane County and plays a key role in protecting the public health of our community. As with most other wastewater utilities across the state and nation, biosolids are generated as part of the RPWRF treatment process. The City of Spokane works directly with farmers to provide biosolids as a soil amendment and adheres to the requirements set forth by Washington Department of Ecology's statewide General Biosolids Permit, WAC 173-308, and EPA Part 503 rules. Biosolids are a rich soil amendment that returns nutrients to the soils, while limiting the amount of commercial fertilizer that needs to be applied. Managing biosolids in this way provides a cost-effective, sustainable resource to a portion of our local agricultural community.

Landfilling and incineration of biosolids are more costly and do not effectively remove PFAS and other substances from the environment. These alternative disposal options would result in numerous additional environmental and logistical challenges. As Spokane and the state continue to grow, so will the production of biosolids. Ensuring beneficial use of biosolids is key to our community's sustainability and resilience.

While substances like PBDEs, PFAS, and microplastics are not produced by wastewater treatment facilities, they can enter waste streams through everyday products used in households and businesses. For instance, PFAS can be found in items like clothing, carpets, cosmetics, and hygiene products, which directly expose users to higher concentrations than those present in biosolids. Reducing these contaminants in wastewater and biosolids requires addressing the true sources—limiting their use in manufacturing and cutting non-essential applications to decrease discharge into public wastewater systems. Evidence shows that pretreatment source control effectively reduces such contaminants, as seen with targeted PFAS reductions in Michigan. RPWRF has an active pretreatment program, with delegated authority, that regulates wastewater entering the facility from businesses. To date, no manufacturers or active users of PFAS chemicals have been identified that discharge to the RPWRF facility.

The City of Spokane supports ongoing research and science-based policy to better identify and address contaminants of concern in biosolids. The science surrounding biosolids management is complex and evolving. We continue to support Ecology, EPA, and the academic community in their commitment to advancing research that bridges knowledge gaps on these emerging contaminants. As such, we are members of Northwest Biosolids which has been funding research and bringing both regulators and municipalities together annually in a collaborative group setting to discuss current soil science and biosolids management since the 1980s. In addition, RPWRF volunteered in Spring 2024 to participate in PFAS research conducted by WA Department of Ecology on the biosolids we produce.

It is essential that regulatory decisions are grounded in rigorous scientific evidence and policies that thoughtfully balance priorities and risks. Once again, we appreciate the opportunity to comment.

Sincerely,

A handwritten signature in blue ink, appearing to read "Jeff Donovan". The signature is fluid and cursive, with the first name "Jeff" written in a larger, more prominent script than the last name "Donovan".

Jeff Donovan

Environmental Program Manager