## Michael Laurie

There are roughly 80,000 chemicals approved for use in the U.S. And many of them were grandfathered in for legal use with little to no testing. And even with the ones that had some minimal testing requirements we are finding that they are more toxic than originally thought as is the case with some pesticides. And as far as PFAS chemicals that are now receiving greater attention, it was known decades ago that Teflon was harmful and it is in the PFAS chemical group. Which leads one to believe that the EPA has not being carrying out its public safety efforts as completely as it should be. And on the one hand EPA has said repeatedly lately that no level of PFAS chemicals are safe, yet Ecology is saying that the level of PFAS chemicals found in sewage sludge are safe. It appears that Ecology has not been paying attention to what EPA said on the subject. Also, even if the level of PFAS chemicals are found to be "safe" on the day that a sample is tested, all bets are off on how "safe" a sample would be on the next day because the quantity of PFAS chemicals flushed down the sewer system will likely vary the next day and every day. And what about testing for the 80,000 other chemicals? We can not make any definitive statements about how "safe" sewage sludge is without testing for the thousands of other chemicals that can end up in sewage sludge every day. And even if a particular sample of sewage sludge is found to be "safe" as far as PFAS chemicals are concerned, testing in Maine and other places has shown that with repeated use of sewage sludge as a fertilizer that the level of PFAS chemicals can build up to very unsafe levels in the soil. I suspect that no one has a good evidence and testing based idea as to how many times you can use sewage sludge as a fertilizer before the levels of PFAS chemicals build up to levels deemed unsafe. Not to mention how long before the other thousands of possible chemical components in sewage sludge build up to unsafe levels in the soil. For these and other reasons I think the small amount of testing we have on the sewage sludge topic and the concerns that the testing has raised suggest that the Determination of Non-significance for sewage sludge (biosolids) should be denied. And the wastewater treatment plant operators in Washington state should be taxed to pay for a significantly great amount of testing. And in the mean time they should be required to send their sewage sludge to approved toxic waste landfills until they can prove that their sewage sludge products are totally safe to use as a fertilizer which I suspect will never happen due to the wide range of untested chemicals that can be in sewage sludge.