

Discovery Clean Water Alliance

Please see attached comment letter.



October 25, 2024

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

Transmitted via Online Public Comment Form:
<https://swm.ecology.commentinput.com/?id=rM4PhRNKm>

Subject: SEPA Determination of Non-Significance for Draft Biosolids General Permit

The Discovery Clean Water Alliance (Alliance) appreciates the opportunity to comment on the State Environmental Policy Act (SEPA) Determination for the Draft Biosolids General Permit. We commend Ecology for its work in updating the SEPA checklist and documentation related to the Determination of Nonsignificance (DNS) and for its continued efforts to responsibly manage biosolids in Washington.

The Alliance is a regional wastewater transmission and treatment utility serving the central portions of Clark County, Washington, and providing wastewater services to more than 125,000 people. Alliance facilities produce about 10,000 wet tons of biosolids each year that are land applied to local farms as a beneficial soil amendment. The Alliance strives to safeguard the health of both the community and the natural environment, while at the same time fostering a prosperous economy. We concur with the DNS, and are providing the following comments for consideration.

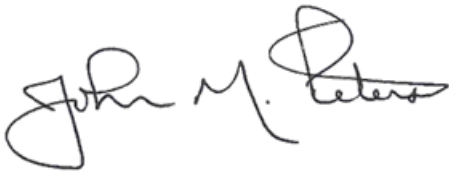
Beneficial use of biosolids is critical to delivering essential public health services to our customers. Wastewater treatment systems protect human health and the environment, and generate biosolids as part of that process. Beneficial use allows wastewater utilities like the Alliance to manage biosolids in a cost-effective, sustainable manner, while providing a rich soil amendment that replenishes nutrients and returns carbon to the soil. Other disposal options, like landfilling and incineration, are not sustainable, do not effectively remove PFAS or other substances from the environment, and rob farmland of essential nutrients. As biosolids production continues to grow with the state's increasing population, maintaining beneficial use will be critical to sustainability and resiliency for clean water agencies. Ecology's proposed permit allows for continued implementation of this vital program and provides regulatory certainty for management of Washington's biosolids.

The Alliance supports source control and pollution prevention efforts that aim to reduce and eliminate contaminants upstream of wastewater treatment facilities. The wastewater treatment process does not use or manufacture PBDEs, PFAS and microplastics; these contaminants end up in our waste streams from their prevalent use in homes and businesses. PFAS, for example, are present

in many household products, including clothing, carpets, cosmetics, and personal hygiene products that directly expose users to far higher concentrations than in biosolids. The ultimate solution to reducing substances of concern in our wastewater and biosolids – and the environment – is to reduce their discharge to public wastewater treatment systems. This means we must focus on the true sources of these substances to effectively address contamination and exposure pathways. Pretreatment and source control have been proven to reduce pollutants in wastewater and the environment. The Alliance supports efforts such as Ecology’s Safer Products for Washington Program that aim to restrict and eliminate toxic chemicals from consumer products.

We support ongoing research and science-based policy to address substances of concern in wastewater and biosolids. Regulatory decisions about biosolids management are complex and the science regarding PFAS and other substances continues to evolve. We support the efforts of Ecology, EPA, and the academic community as they work to address knowledge gaps on these emerging contaminants, recognizing the time and investment it takes to develop research that will meet the necessary standards of scientific rigor and peer review. At the same time, public agencies like the Alliance rely on regulatory certainty to manage operations in a cost-effective manner, and uncertainty regarding PFAS has created instability for biosolids management programs. The Alliance supports regulatory decisions based on sound science and practical, attainable solutions that address our most critical priorities, while weighing risks appropriately.

Sincerely,

A handwritten signature in black ink that reads "John M. Peterson". The signature is fluid and cursive, with the first name "John" being the most prominent.

John M. Peterson, P.E.
General Manager, Clark Regional Wastewater District
Executive Director, Discovery Clean Water Alliance