

The Coalition for Clean Water

The Coalition for Clean Water appreciates the opportunity to comment on the State Environmental Policy Act threshold determination for the Statewide General Permit for Biosolids Management. Coalition members provide wastewater services for nearly half of Washington's eight million residents and produce more than sixty percent of Washington's biosolids. We commend Ecology for its work updating the SEPA checklist and documentation related to the Determination of Nonsignificance (DNS). Our comments follow.

The beneficial use of biosolids is a critical part of delivering essential public health services to the citizens of Washington. Wastewater treatment systems protect human health and the environment and unavoidably generate biosolids as part of that process. Even though biosolids are applied to less than one-tenth of one percent of lands in Washington each year, beneficial use allows wastewater utilities to manage biosolids in a cost-effective, sustainable manner, while providing a rich soil amendment that returns nutrients to the soils where they belong.

As noted by Ecology, "...decades of scientific research have shown that biosolids provide needed nutrients and organic matter to soils for healthy crop and forest production. The use of biosolids reduces the need for synthetic fertilizer, increases soil organic matter content and water retention, and reduces erosion. Biosolids have been shown to improve habitat, which in turn has a positive impact on wildlife. ... biosolids are a proven component of successful land reclamation projects following major disturbances such as mining." Landfilling and incineration are not sustainable practices, do not effectively remove PFAS or other substances from the environment, and rob farmland of essential carbon and nutrients.

Biosolids production will continue to grow as our state's population increases. Maintaining beneficial use is critical to sustainability and resiliency for clean water agencies. Ecology's proposed permit allows for continued implementation of this vital program and allows additional and more stringent conditions as needed for specific facilities and sites. The permit also saves money and resources for communities without active biosolids management programs by fairly reducing the permit process burden.

PBDEs, PFAS and microplastics are not used or manufactured as part of the wastewater treatment process but end up in our waste streams from their use in homes and businesses. These substances are present in biosolids because they reflect our daily lives. 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 and eliminate their non-essential uses in manufacturing. This means we must focus on the true sources of these substances to address contamination and exposure pathways. Pretreatment source control has been proven to reduce concentrations in wastewater and the environment, and has worked for targeted forms of PFAS in the State of Michigan, an approach supported by U.S. EPA.

We support ongoing research and science-based policy to identify and reduce substances of concern in wastewater and biosolids. The science essential to making informed decisions about biosolids

management is complex and evolving. We support the efforts of Ecology, EPA, and the academic community as they work to bridge the 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. Regulatory decisions must rely on sound science and good policy that addresses our most critical priorities while weighing risks appropriately.