

# Chrys Ostrander

Using toxic municipal sewage sludge as fertilizer IS NOT ECOLOGICAL.

The State of Washington must cease issuing and nullify any permit that allows the disposal of municipal sewage sludge in any form on homes, farmland, forestland or parkland.

Furthermore, the Dept. must live up to its name and inform the WA state legislature that using toxic municipal sewage sludge as fertilizer is not a "beneficial use" of sewage sludge (RCW 70A.226.005). The Dept. for decades has hidden behind the legislature's purely political, shockingly unscientific declaration of that beneficial use as its excuse for brazenly promoting and facilitating the pollution of millions of acres of farmland and the food produced on it as well as surrounding wildlife habitat and surface and ground waters with sewage sludge.

Informed and concerned people like me have protested against this practice for many years citing credible scientific evidence of the hundreds of toxic contaminants present in municipal sewage sludge and yet the bureaucratic juggernaut has simply plowed over our protests.

But things are changing.

Now that scientists and the general public have learned of the public health crisis we're in caused by a family of toxic "forever chemicals" (sometimes referred to as PFAS, used as fire retardants, non-stick surfaces, etc.) that are being detected everywhere, including in our bloodstreams, and are now known to accumulate in sewage sludge, finally the protests are having an effect.

The Dept. of "Ecology" must no longer IGNORE the environmental impacts of spreading sewage sludge claiming the practice HAS NO SIGNIFICANT ENVIRONMENTAL IMPACT which therefore absolves the Dept. from having to conduct any thorough scientific assessment of its impact.

Things changed when the Dept. was successfully sued last year by a citizen's group called the Nisqually Delta Association. The Pollution Control Hearings Board found that the WA Dept. of "Ecology" had simply omitted any reference to PFAS, PBDEs (similar to PFAS), and microplastics in its documentation supporting its position that the environmental impact of sewage sludge application to farm and other land was "insignificant". The decision of the Hearings Board voided the Dept. reissuing its statewide permit effectively halting any new sewage sludge application sites in the state.

Now, in an appalling effort to restart the sewage sludge program, the Dept. CONTINUES TO CLAIM NO SIGNIFICANT ENVIRONMENTAL IMPACTS result from sludge application to farmland even after it was forced by the Hearings Board to include PFAS, PBDEs, and microplastics in its documentation claiming said insignificance.

AT ALL COSTS (INCLUDING TO OUR HEALTH AND THE HEALTH OF OUR CHILDREN), THE WA DEPT. OF "ECOLOGY" WANTS TO AVOID HAVING TO CONDUCT AN ENVIRONMENTAL ASSESSMENT OF THE LAND APPLICATION OF MUNICIPAL

SEWAGE SLUDGE, SHAMELESSLY CLAIMING IT HAS NO SIGNIFICANT IMPACT. The Dept. knows that such an investigation would reveal the many hazards resulting from the practice which would necessitate its immediate cessation. Claiming insignificance absolves the Dept. from having to conduct the study. This is bureaucratic malfeasance at its worst.

The last time the Dept. had a public comment period on the reissuance of the statewide biosolids permit (2021), out of exactly 100 public comments received by the Dept., 86% of people who submitted written comments didn't want municipal sewage sludge to be used as fertilizer, or that its use be significantly more strictly regulated. 65% wanted an immediate ban.

The land application of municipal sewage sludge certainly has significant environmental impact, the Dept.'s claims of non-significance notwithstanding. The Dept. has a clear choice: Either end the practice entirely or conduct a full environmental impact assessment (which no doubt would result in ending the practice of land application of municipal sewage sludge – and YOU KNOW THAT).