

Denise Ebbighausen

I disagree that using municipal sewage sludge as fertilizer is currently not safe because there are too many unknowns to risk the health of our soils and ground water. After reviewing the RCW 70A.226.005, the Department of Ecology State of Washington Biosolids, and the U.S. Environmental Protection Agency, "Introduction to the National Pretreatment Program, just brought up more concerns which are underlined below:

Extract of 70A.226.005 - Findings - Municipal sewage sludge as a beneficial commodity
Under the legislature finds that:

Subparagraph e - Municipal sewage sludge can contain metals and microorganisms that, under certain circumstances, may pose a risk to public health.

An extract from the Department of Ecology State of Washington, "Is it safe to use biosolids?" While studies are ongoing to fill information gaps in the chemical composition of biosolids, they are a beneficial product resulting from treating domestic sewage in a wastewater treatment facility.

U.S. Environmental Protection Agency, Introduction to the National Pretreatment Program. The preface extracts that are of interest:

- The goals of the CWA, Clean Water Act, are to eliminate the introduction of pollutants into the national navigable waters.
- Even when a POTW, Publicly Owned Treatment Works, has the capability to remove toxic pollutants from wastewater, the pollutants can end up in the POTW's sewage sludge, which might then be processed into a fertilizer or soil conditioner that is land-applied to food crops, parks, golf courses or elsewhere.

Based on my brief research and concerns above, it does not make sense to risk our soils and ground water to unknown contaminants which could have long term effects. An example is the West Plains PFAS contamination of over 300 wells in that area.

The CWA addresses only navigable waters. What about protecting groundwater? Plus the RCW Title 70A is Environmental Health and Safety, which should be the priority in any decisions.

Thank you for your time and appreciate the opportunity to provide feedback.

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