

# NorthWest Biosolids

Thank you for the opportunity to comment on the State Environmental Policy Act threshold determination for the Statewide General Permit for Biosolids Management. At Northwest Biosolids, our mission is to advance environmental sustainability through the beneficial use of biosolids. We encourage the Pollution Control Hearing Board to accept the Department of Ecology's findings and allow the General Permit to be implemented.

NW Biosolids shares concern over PFAS, PBDE's and microplastics. These compounds have been introduced into consumer products, water, and wastewater systems for decades, leading to contamination of our soils and waterways. This realization is profoundly disheartening, as it impacts us all. It is important to note, however, that wastewater treatment plants are passive receivers of these chemicals. They do not produce PFAS, PBDE's or microplastics.

It is also important to note the role biosolids play in agricultural and environmental sustainability. Decades of research shows that biosolids build soil health by returning nutrients and organic matter back to the land, mitigating soil erosion and nutrient leaching, and reducing farmers' dependence on synthetic fertilizers.

Biosolids also help in the fight against climate change by directly and indirectly decreasing CO<sub>2</sub> in the atmosphere by sequestering it in soil. Proper land application of biosolids conserves limited landfill capacity and reduces potential greenhouse gas emissions from anaerobic decomposition in landfills.

NW Biosolids believes any policy decisions must be science-based, and therefore supports ongoing research into these emerging contaminants. Thorough, scientifically rigorous and peer-reviewed studies must inform policy.

Thank you for your consideration