

jean Mendoza

Dear WA State Dept. of Ecology,

I am a citizen with serious concerns about the impact of bio-solids application to forest and cropland and the subsequent non-point pollution of Washington surface waters. We observe that the current draft of Washington's Water Quality Management Plan to Control Nonpoint Sources of Pollution references Washington's General Permit for Bio-solids on page 23, stating:

Bio-solids are the nutrient-rich organic materials resulting from the treatment of sewage sludge (the name for the solid, semisolid or liquid untreated residue generated during the treatment of domestic sewage in a treatment facility). Bio-solids facilities in Washington operate under a statewide General Permit for Bio-solids Management issued by Ecology.²⁹ This permit covers land application of bio-solids and other related processes and aspects of operations related to biosolids.³⁰ The state bio-solids program regulates bio-solids (including septage) applied to the land, bio-solids sold or given away in a bag or other container, bio-solids being stored, bio-solids transferred from one facility to another, and sewage sludge disposed in a municipal solid waste landfill. The existing general permit expires on August 20, 2015. Ecology is currently in the process of developing a new general permit. There are currently about 200 applicable facilities in the state.

This statement is incorrect. Washington issued a new General Permit for Bio-solids in June 2022 that became effective in July 2022.¹ As many commenters noted there is inadequate testing for harmful pollutants in permitted bio-solids.² Bio-solids have been misclassified and incorrectly applied, endangering nearby rivers and streams with endangered and threatened species. ³Bio-solids have been applied to forests where they pollute runoff. ⁴Applications are not adequately monitored in Washington State, and the impact of the thousands of chemicals in bio-solids on public health, plants and animals is largely unknown.⁵

At a minimum Washington's Water Quality Management Plan to Control Nonpoint Sources of Pollution should acknowledge the risks of non-point source pollution from bio-solids to the surface waters of our great state.

Sincerely,

Jean Mendoza

1 Statewide General Permit for Bio-solids Management. 2022.
<https://apps.ecology.wa.gov/publications/documents/2107006.pdf>

2 Response to Comments: General Permit for Bio-Solids Management. 2022. Page 200.
<https://apps.ecology.wa.gov/publications/documents/2207015.pdf>

3 Response to Public Comments Fire Mountain Farms Bio-solids Permitting Agreed Order. 2021.
<https://fortress.wa.gov/ecy/ezshare/swm/biosolids/fmf-2021-finaAO19442-RTComments.pdf>

4 Response to Comments: General Permit for Bio-Solids Management. 2022. Page 356.

<https://apps.ecology.wa.gov/publications/documents/2207015.pdf>

5 Response to Comments: General Permit for Bio-Solids Management. 2022. Page 30.
<https://apps.ecology.wa.gov/publications/documents/2207015.pdf>