



NORTHWEST BIOSOLIDS MANAGEMENT ASSOCIATION

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December 2, 2011

Laurie Davies
Waste 2 Resources Program
Washington State Department of Ecology
P.O. Box 47600
Olympia, WA 98504-7600

Dear Ms. Davies:

The Northwest Biosolids Management Association (NBMA) would like to take this opportunity to reaffirm its support for the Washington State Biosolids Program managed by the Department of Ecology. The NBMA represents close to 200 public municipalities, sewer districts, and private companies, most of which are located or have worked with biosolids in Washington State. The NBMA is committed to the advancement of environmental sustainability through the beneficial use of biosolids. 75% of our regional membership has been operating under Ecology's Biosolids management program since its inception, and many of our members actively worked for the passage of RCW 70.95j which was the legislation upon which the current biosolids program was based.

Chapter 70.95j states that "properly managed municipal sewage sludge (biosolids) is a valuable commodity and can be beneficially used in agriculture, silviculture, and in landscapes as a soil conditioner." This declaration of value and endorsement of beneficial use helped to create the recycling culture that exists today in the biosolids community. This recycling culture is, in part, sustained by the consistency and certainty afforded by a strong state regulatory program

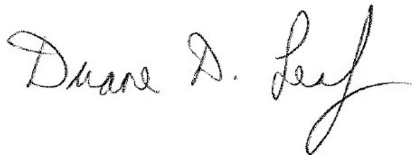
The NBMA believes a strong state biosolids program is essential for effective and efficient biosolids management. Prior to the adoption of WAC173-308, biosolids were managed and permitted by individual public health districts. Public health districts then (as they are often today) were chronically understaffed and underfunded. This resulted in inconsistent and often archaic rules being imposed on the beneficial reuse of biosolids. The passage of RCW 70.95j and the subsequent adoption of the state biosolids rule created a level playing field for all of Washington State. This not only provided consistency in biosolids regulation across the state, but availed all areas of the state access to the best and most up-to-date biosolids information. We believe that this approach has resulted in protective and rational

regulation of biosolids facilities in the state, rapidly covering the needed regulatory and good management practices, while not compromising Ecology's ability to tailor individual conditions for specific facilities or sites. The NBMA also believes that a strong State program has resulted in cost-effective regulation and improved environmental protection, while at the same time cultivating an important recycling practice.

The NBMA is very concerned that recent attempts by some local jurisdictions to ban or severely restrict the land application of biosolids within their borders may signal a return to the inconsistent piecemeal regulation of biosolids that RCW 70.95j was enacted to prevent. We urge Ecology to vigorously defend its role as the primary regulatory authority for approving the final use of biosolids in Washington State and to strive to maintain the strong and effective biosolids management program that has become a national model for recycling and environmental protection.

If you have any questions or would like additional information on the NBMA experience with Ecology's Biosolids Management Program, please call Dan Thompson, co-chair of our Regulations Development Committee, at 253 502-2191.

Sincerely,

A handwritten signature in cursive script that reads "Duane D. Leaf". The signature is written in black ink and is positioned below the word "Sincerely,".

Duane Leaf, President
Northwest Biosolids Management Association