

Tim's bio-solids testimony

My name is Timothy Pellow and I am a certified organic vegetable farmer growing and residing in Mill Canyon, outside of Davenport, WA.

Organic regulations under the National Organic Program (NOP) preclude the use of sewage sludge (biosolids) in any form. This is due to the admixture which makes up municipal sludge, which includes: actual human waste products, which are oftentimes contaminated with synthetic drug residues; whatever else gets dumped down residential drains, including household chemicals, synthetic drugs, and many other unsafe products; industrial waste; and road runoff, which includes oil, antifreeze, gasoline dripped or spilled from automobiles and home mechanics; chemicals released through asphalt degradation; animal wastes and carcasses; and yard, garden, and farm agricultural chemical runoff. The chemical residues and other toxic contaminants in sewage sludge (biosolids) caused the NOP to ban its usage in organic certified systems.

No farm exists in a bubble, and so the NOP designated buffer zones for how far applications of non-allowable products must be applied from an organic operation without threatening the operations certification. Though Rosman's proposed application would be well outside the general buffer zone, it is still worrisome due to the threat of windborne or waterborne contaminants. The NOP regulations state:

As an organic farmer, you are responsible for all materials applied to your fields, even when you do not apply those materials yourself. Organic crops can be contaminated through residues in spray equipment, drift from nearby fields, accidental sprays, or mistakes made by employees.

The USDA organic regulations have very little to say about irrigation and irrigation water quality. However, since it is the general intent of these regulations that crops and soils not be contaminated with prohibited substances, producers should take precautions to ensure that irrigation water is not loaded with agricultural pesticides or other polluting chemicals.

Thus, even were I not the one applying prohibited substances, certification can be threatened by exposure to such substances from other farms or landowners. There are many days every summer when the weather prediction is "blowing dust" and the air is thick with dust from the cultivated fields of the farms surrounding us. Also, people in alluvial fan canyon lands, such as we are, naturally worry about water contaminants from those along the edge of the canyon. Windborne and waterborne contamination by the myriad of chemical and heavy metal contaminants of sewage sludge (biosolids) is a very real concern to me and my neighbors both in terms of our personal health, the health of our environment and soils, and the viability of our business.

Our farm has been certified organic for about a quarter century, certified by Washington State Department of Agriculture before a national standard even existed. For decades before certification the community in which our farm resided eschewed the use of agricultural chemicals, utilizing methods to build up the health of the soils, increasing their biomass and microfauna activity, while minimizing chemical exposure and toxic buildup. This focused attention and commitment to healthy organic land stewardship is what draws our customers to us, what makes our business thrive. Our hundreds of families in Spokane area and dozens in the Davenport area who consume our produce do so for the security this knowledge provides. It is important to them, and it is personally important to us, that our soils and food not be contaminated by us, and, as much as we

have control over it, by the actions of others.

As an aside, I would mention that at the recent biosolids hearing in Davenport regarding the Rosman application, Ms. Bickner said that she had, if memory serves, about 120 biosolids applications she supervised, but that the vast majority of them are those wishing to dispose of municipal wastes, whereas (again if memory serves) only nine sites throughout Eastern Washington were those who wished to receive such waste products through land application. The huge imbalance between disposers and recipients would to me imply a strong pressure to dump as much as one could on as many willing recipients as one could find. Due to the concerns I have outlined, I would hope the upper rim of the canyon where I live would not become such a destination point. Knowing that Rosman has applied septic wastes to the same lands in the past without any regulation, and seeing the record of complaints towards Mr. Thode's operation (including that, for 19 years, under Department of Ecology supervision, he was mixing hazardous waste from a plastics factory with municipal sewage waste and applying it to people's land) does little to assuage such concerns. Rather, the fact that a man such as Thode can continue to be an Ecology licensed biosolids applicator after flagrantly and intentionally violating Ecology's own regulations, illegally spreading hazardous waste under the guise of biosolid application without regard to the health or safety of those in the recipient areas for nearly two decades, reinforces my sense that this is an ill conceived and poorly regulated program which is more about economy of cheap waste disposal than ecology. I would ask that the biosolids application for Rosman lands be denied.

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