

**Public Comments from www. epa.gov/edocket- OW-2003-0006 and Other Comments
Related to the Science and Politics of Sludge Spreading**

1. **If EPA cannot devote its resources to figure out why sludge is making people sick. . . it must ban land application because EPA cannot make a finding that the regulations are “adequate to protect public health and the environment from any reasonably anticipated adverse effects.” (33 U.S. F.R. 1345 (d)(2)&(3). *Nancy Stoner, Natural Resources Defense Council - OW-2003-0085***
2. **The National Academy of Sciences recent report states that it is impossible to do a (reliable) risk assessment (for land application): “. . . *the remaining uncertainty for complex mixtures of chemicals and biological agents is sufficient to preclude the development of risk management procedures that can reliably result in acceptable levels of risk.*” The National Sludge Alliance will continue to call for Congress to end the land spreading of all sludge and to hold EPA accountable for failing to safely regulate the management of this toxic waste. *Charlotte Hartman, The National Sludge Alliance. OW-2003-0095***
3. **The EPA should implement an emergency moratorium on the land application of sewage sludge. *Laura Orlando, The ReSource Institute for Low Entropy Systems -OW-2003-0069***
4. **The current practice of . . . spreading hazardous wastes and Class B biosolids on land surfaces . . . should be discontinued. Alternative disposal sites should be identified which eliminate the risk of surface and groundwater contamination, protect the health and safety of citizens, and protect the soil and water of agricultural lands from which the nation’s food is produced. *National Farmers Union Policy Statement endorsed in March, 2003.***
5. **Further research must be conducted by neutral entities with no economic interest in the results. The acceptance of “some health risks” by the USEPA on behalf of the general public comes almost exclusively at the expense of farmers and their communities where sludge is applied. There is no factual support or policy justification for exempting any Class A EQ sludge from regulation. *Ronald Liebert, Associate Counsel- CA Farm Bureau - OW 2003-0062***
6. **Additional pathogen research needs to be done by independent scientific bodies that are not funded by the sludge industry. *NRDC- OW 2003-0085***
7. **Our vision is to be the most trusted water environment research organization. June 3, 2003 Memo from WERF Executive Director, Glenn Reinhardt to the Summit Program Committee.**
8. **EPA’s mandate is to protect the citizens of this country, not the sludge industry. Research by WERF will be suspect because of its ties to the wastewater industry. The application of biosolids to land needs to be regulated by good, peer reviewed science, not by industry desires. *David M.Burrows, V.M.D. OW-2003-0045***

- 9. All federal funds to the sewage industry trade organizations should be halted. WERF should have no role in either conducting or directing (sludge) research. Judy Johnson, *Citizens for a Future New Hampshire-OW-2003-0079.***
- 10. Health problems linked to sludge must be thoroughly and honestly researched by independent and qualified scientists who have no ties to the waste industry. *Barbara Rubin, Neighbors Against Toxic Sludge- OW-2003-0050***
- 11. EPA only mentions research favorable to their position. Research by Dr. David Lewis . . . is never mentioned. EPA should mention and honestly evaluate all relevant research. David Burrows V.M.D. OW-2003-0088.**
- 12. PA.DEP, who assures us biosolids contain no harmful pathogens, requires that it not be (incorporated into the soil) too soon, so that sunlight can kill germs. Brilliant! Doesn't that sound slightly contradictory? Likewise, your own requirement that no one walk in (sludged fields) for 30 days after spreading. Why not? Is it safe, or isn't it? One cannot but wonder if any rational individuals are involved in this program. *Don H. Berkebile- OW-2003-0094***
- 13. Federal research dollars should be distributed by and directed to people and organizations with no financial stake in the sludge management industry. *Laura Orlando -OW-2003-0069***
- 14. EPA plans to channel its funding to the same programs, individuals, and institutional networks it created for promoting land application as safe and beneficial. This same strategy produced the current body of unreliable and inadequate science EPA now seeks to improve. *Sierra Club-OW-2003-0044***
- 15. Why doesn't EPA put health studies right at the very top of its plans? If EPA is doing such a great job, why do thousands of sludge-impacted people complain? *Thomas Albert, V.M.D. OW-2003-0091***
- 16. The result of our investigation and work published subsequent to the drafting of the NRC report (Lewis et al, 2002) make it reasonable to believe that in some circumstances neighbors are getting ill from land application. There is a critical need to respond immediately to reported illnesses associated with land application. . . There needs to be an independent group established to investigate (health) complaints. . . one not comprised of government agencies or professional associations that have a stake in the regulations of sludges. *Ellen Harrison OW-2003-0072***
- 17. There is a serious lack of health-related information about populations exposed to treated sewage sludge. To ensure public health protection, EPA should investigate allegations of adverse health effects. . . *Thomas A. Burke, NRC panel chair. July, 2002 Press Release.***
- 18. Protecting academic freedom and free speech and providing a forum for open debate (may be) more important than resolving the scientific and public health issues. When WERF, WEF, EPA, and Synagro use their great resources and talents**

- to impose their will through fear and intimidation, they forfeit their integrity.
Research microbiologist, David Lewis. OW-2003-0066
19. After seeing how EPA and industry collaborated to try everything to destroy Dr. Lewis' reputation and career . . . no scientist in his right mind is going to want to research sludge and face the same ordeal. Dr. Lewis' termination threatens the foundation of freedom of speech. . *Barbara Rubin- OW-2003-0050*
 20. The Sierra Club is appalled that EPA is involuntarily terminating Dr. David L. Lewis, a 32-year veteran research microbiologist, whose research has been published in *Nature* and *Lancet* and other prestigious international scientific and medical journals. The sole reason for the termination is that Lewis criticized EPA's sludge policies in scientific articles. *Sierra Club OW-2003-0044*
 21. Dr. Lewis has raised significant scientific concerns regarding EPA's sludge Rule, advancing quality science in the face of adversity. These concerns were validated by two independent organizations—the EPA Office of Inspector General and the National Research Council. *May 21, 2003 letter from Senators Inhofe and Grassley to former EPA Administrator Christine Whitman.*
 22. The decision of which use or disposal practice of sludge to use is a local decision. *July 10, 2003 letter from EPA Assistant Administrator, G. Tracy Mehan, to Senator John Warner.*
 23. Promulgating more protective sludge management measures should not be left to local communities but must be incorporated into the federal rules. Many communities who have tried to put in place more protective ordinances, have been sued or threatened with lawsuits for doing so. *Sierra Club-OW-2003-0044*
 24. The (WERF) summit will provide a forum for free and open exchange on . . . how best to address concerns . . .of stakeholders. *WERF Media Advisory July 7, 2003.*
 25. In real life, stakeholder participation is repeatedly thwarted by a powerful coalition of state and federal agencies and the sludge industry. Even when public hearings are held, they are not for the purpose of public input, but to promote the beneficial use of sludge. . . All this adds up to an affront to freedom of science, freedom of speech, protection of public health, and democracy. *Barbara Rubin -OW-2003-0055*
 26. The U.S. EPA has misinterpreted the intent of the U.S. Congress. We do not believe that the intent of Congress was to encourage the application of sewage sludge in a manner which would pose serious ongoing damage to the public health, contaminate our nation's food and water supplies, damage private and public property, and adversely impact the environment. *Introduction to the Sierra Club Guidance Document on the Land Application of Sewage Sludge.*