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1496 Teague Drive  
McLean, VA 22101  
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Delegate Clarke N. Hogan  
General Assembly Building  
P.O. Box 406  
Richmond, VA 23218

Dear Delegate Hogan:

I have spent the last 3 years investigating and educating others on the sewage sludge issue. My group is responsible for one of the most widely used sewage sludge websites, [www.Loudoun.NATS.org](http://www.Loudoun.NATS.org).

I consider myself a sewage sludge victim whose health is permanently altered because of sludge exposure and the subsequent potent drugs used to treat my illness. Therefore, I am delighted to have the opportunity to forward my recommendations on eliminating the problems with sewage sludge application in Virginia.

In the middle of a hot and windy August 2001, after sludge had been applied to fields around my village in Loudoun County, I came down with an extremely virulent pneumonia, sinus infection, prolonged laryngitis, stinging eyes, nausea and aching body. It took 8 different antibiotics, a hospital stay, 4 months of bed rest, and \$15,000 of initial medical costs, to recover. I say initial because 3 years later I struggle with a weakened respiratory system, and have developed 4 neurological problems that were probably triggered by the initial toxic exposure and worsened by the strong drugs administered to cure the ensuing illnesses.

It is abundantly clear after three years of research that no credible science exists to prove that sludge exposure is safe. In fact EPA never even considered airborne exposure at the inception of the Sludge Rule nor did it consider interactions of pathogens and chemicals (see National Academy of Sciences (NAS) quote [a] below.) On October 29, 2003, EPA Deputy Administrator Paul Gilman admitted on CBS Evening News that land application may not be safe and the whole safety issue needed "to be revisited." There is scientific documentation that links adverse health effects, including deaths, to land application of sewage sludge. Irritant chemicals emitted by sewage sludge break down our natural barriers to infection making us more susceptible to opportunistic pathogens in the environment. This evidence is supported by growing anecdotal evidence that people down wind of sludged fields or sewage treatment plants are prone to become sick with a similar pattern of illnesses. In fact, people all over the US exposed to sewage sludges are experiencing the same health horrors we experience in Virginia. Medical evidence is mounting, the Loudoun Neighbors Against Toxic Sludge website lists doctor's statements, and the IPO-SE video includes victims citing doctors' letters and diagnosis that hold sludge responsible for, or a threat to, their illnesses. See [http://www.loudounnats.org/links\\_other.htm](http://www.loudounnats.org/links_other.htm)

Two EPA Inspector General Reports, including a memo dated September 6, 2002, warn the Agency that it has not done even the basic research to assess the risks of land application and that "EPA **does not know** whether current regulations, **when adhered to, are protective of public health.**" (Emphasis added)

Legislative tinkering with regulations that deliberately ignore the hundreds of reported adverse health problems is a waste of time. Increased enforcement and component-based testing will not do much to protect public health or damage to the environment. VDH consistently fails to enforce existing industry crafted regulations, and presently much of the testing sensitive enough to measure accurately the small allowable limits **does not exist**. The fact that no one today knows all that is in sewage sludge, and that no one can predict the infinite interactions of pathogens and the 100,000 + chemical compounds, is an insurmountable problem warns the 2002 NAS Report which examined the scientific basis of the EPA 503 Rule. The NAS concludes:

(a) Because sludge is such a complex and unpredictable material "**it is not possible to conduct a risk assessment for biosolids at this time (or perhaps ever) that will lead to risk-management**"

**strategies that will provide adequate health protection without some form of ongoing monitoring and surveillance.”**

(b) “The lack of risk-assessment approach means that **there is no explicit delineation of acceptable risk concentrations for Class A & B biosolids** in Part 503 rule.”

(c) “EPA **did not consider airborne and waterborne release and dispersal of microorganisms for off site exposure.**” (Emphasis added)

How can the state of Virginia, in light of the overwhelming evidence that sludge has clearly diminished the quality of life of those exposed, and has the further potential of devastating citizen health, especially the young, old, and immune compromised, continue to force this polluting waste product on unwilling citizens?

It is abundantly clear that the only safe and sure way to protect the health and quality of life for Virginia citizens is to call a moratorium on the ill conceived sewage sludge land application program. We should follow the four EU countries that have already banned sludge applications, with farmers in at least four additional countries hostile to its continuance. We should heed our own 300,000 member National Farmers Union which says “*The current practices of disposing hazardous wastes in existing landfills and surface mine sites, spreading hazardous wastes and class B biosolids on land surfaces, and injecting hazardous wastes in deep-well sites should be discontinued.*” Focusing on “sludge quality” and component-based testing will do nothing to reduce the ever mounting reports of adverse health effects. Reducing those risks can only be achieved through a moratorium assuring that the public is not exposed to this harmful material.

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cc: Virginia Assembly, Virginia Board of Health, VDH, press