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To: biosolids@deq.virginia.gov  
Sent: Monday, October 29, 2007 11:51 AM  
Subject: Sludge Panel's Biased Work

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Biosolids Expert Panel Members:

I want the Panel and Assembly to be aware that there are sludge victims and citizens who feel completely left out of the carefully orchestrated work of a group of members (who mainly have sludge industry affiliated jobs) plus two so called "citizen representatives. (See letter below.)

Henry Staudinger, who is labeled "citizen representative," does not represent the concerns of all victims or citizens involved in this issue. Therefore, his agreements and conclusions may not be acceptable to the greater public.

The second so called "citizen representative" Alan Rubin recently retired from the EPA. His entire professional career is dependent on the sludge program prevailing. Now he is a well paid consultant to the sewage sludge industry. Hardly what victims and those opposed to sludge would call a "citizen representative."

Please note the early activity of certain members in the initial meeting and letters generated by the above referenced panel members, make it clear the agenda is being hijacked by pro-sludge propagandists. The "private" meeting between the above two members was probably a rules violation. The panel appears to be ignoring the most important facts while being "steered" to focus on manipulated materials controlled by those intent to force this heinous program on unwilling citizens. Panel members themselves admit they have no allotted funds and "limited resources and time" to produce credible results.

The work product of this panel will be questioned by most citizens. As examples, I for one strongly dispute the premise in H. Staudingers posted letter:

"From the perspective of the public, it is hoped that the panels report will lead to better protection for health, the environment and quality of life 'when' biosolids are land applied." (emphasis added)

This statement assumes that the program should continue because there is a way to spread sewage sludge so that the stench and airborne toxic particles will be safe for the health of neighbors. This is false propaganda that the EPA/sludge industry wants us to believe. I have researched sewage sludge and the exposure of neighbors for 5 years and have found no evidence of safe usage when regulations are followed. We know regulations are rarely followed, however, even the EPA Inspector General admits that if all regulations are followed there is NO ASSURANCE sewage sludge is safe for public health. One only has to visit Helane Shields website, <http://www.sludgevictims.net> to find that neighbors all over the US exposed to sewage sludge suffer from similar illnesses. There are also deaths linked to sludge exposure. Therefore, the only strategy that will provide citizens assurance that they are safe from the horrific health and environmental consequences of sludge exposure is to call a moratorium on the sludge program.

Similarly the following statement in A. Rubins posted letter erroneously assumes citizens should be responsible for providing scientific data.

"The public's inability to scientifically document the exposure relationship to biosolids that are in close proximity to their residence due to lack of information as to the constituents in biosolids has been particularly troubling." (Emphasis added.)

This is an outrageous assumption and should be condemned immediately. As to documentation, there is no documentation because the EPA/industry/local governments chose not to document, and they chose to ignore doctors' letters and scientific studies linking illness and deaths to sludge exposure. Victims and citizens are not responsible for scientific evidence. EPA/local governments/industry are responsible for scientific evidence proving sludge safe for public health.

I would also like to take this opportunity to express my full support for the 10/23/07 letter from Mary Carwile. She rightly points out the infuriating lack of attention to health survey and exposure studies by independent scientists. This inattention is in spite of citizens' repeated requests for these studies. Perhaps the sludge supporters know the results would support the citizens' contention that sludge exposure is linked to numerous health problems and even deaths.

Mary also correctly points out that the panel seems to be ignoring the only peer-reviewed study (which has never been refuted) ever done on health effects of sludge. She goes on to say: "the constituents in land applied sludge have long since been proven to be so complex and so unpredictable that a reliable health risk assessment of land applied sludge based solely on trying to identify contaminants in sludge, without considering interactions of chemicals and the effect of breakdown products will never be possible."

Why is the Panel ignoring these crucial facts? A. Rubin suggests in his letter working on "adequate" buffers would be an acceptable substitute. There is not a shred of scientific evidence dealing with the matter of safe buffers. The original "guess" on buffers has been a disaster. Why should citizens have any more faith in a second guess by unresponsive promoters of this dangerous program?

So far, this panel has verified citizens' worst fears and will never have credibility with the public until our real concerns are addressed, our unfiltered views are included, and we are represented in adequate numbers. Why aren't the sludge propagandists forced to present credible scientific evidence by independent scientists that sludge exposure is safe for public health, instead of false propaganda?

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