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Loudoun Neighbors Against Toxic Sludge  
1496 Teague Drive  
McLean, VA 22101  
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Mr. Joshua Rainville  
101-H Lancer Circle  
Farmville, VA 23901

Dear Mr. Rainville:

We are pleased that you visited our website to learn the truth about land application of sewage sludge. But we are puzzled by your request that we should “present both sides”. Our website and [www.sludgefacts.org](http://www.sludgefacts.org), were developed because the EPA, the sewage industry, and municipalities have worked together for many years to promote sludge use to farmers, the public, legislators, the media, and even the National Academy of Sciences, by claiming that the current land application policies are scientific, sustainable, and safe. Data our groups have collected and posted on our websites, indicate the opposite.

Because of so many reported “incidents”, the EPA no longer directly promotes land application, and a former EPA Deputy Administrator warned that the whole issue “needs to be revisited.”

You incorrectly state that the words “sludge” and “biosolids” cannot be used interchangeably. Treated sewage sludge that meets the 503 regulations and “biosolids” are exactly the same material, and are frequently interchanged in official government documents and scientific papers. In fact “treated municipal sewage sludge” (often abbreviated as “sludge”) is the official legal term for this material, which the Federal Clean Water Act defines as a pollutant.

We do not agree that Class A EQ sludge is harmless or “strictly regulated.” It can legally contain up to 41 mg/kg of arsenic, 39 mg/kg of cadmium, 17 mg/kg of mercury, 300 mg/kg of lead, copper and zinc in excess of crop needs, as well as potentially harmful organic chemical compounds and viable disease-causing pathogens. Class A sludge compost has been known to destabilize when it becomes wet; yet management of this material is virtually unregulated.

We have not found any peer reviewed papers published in the technical literature that support land application that are based on reliable and honest data that show that sludge spreading is safe, scientific, and sustainable.

Meanwhile we invite you to continue to visit our websites to obtain accurate information about the controversial practice of using a complex unpredictable contaminated waste product as “fertilizer.”

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