

City of Tacoma  
Environmental Services  
2201 Portland Ave  
Tacoma, WA 98466  
David Hufford  
253-502-2155

September 13, 2002

W-99-18 NODA Comment Clerk, Water Docket (MC-1401), USEPA  
1200 Pennsylvania Avenue, NW  
Washington, DC 20460

Dear Sir or Madam:

The City of Tacoma would like to thank you for this opportunity to comment on Standards For The Use And Disposal Sewage Sludge: Notice of data availability. The City of Tacoma Environmental Services Wastewater Division operates 2 wastewater treatment plants treating an average daily flow of 28 MGD. Our facility generates approximately 4000 dry tons of Class A biosolids annually, all of which is land applied.

The City of Tacoma commends EPA on a well-organized and informative document explaining the new dioxin data and the revised risk assessment. The use of sensitivity analysis to determine the effects of setting numerical limits for dioxin in land-applied biosolids was particularly helpful. EPA's 2001 dioxin update survey and the revised risk analysis contain several points that will be very useful to EPA in determining what revisions may be necessary to existing regulations for the use and disposal of biosolids and existing pretreatment regulations.

The importance of the finding that setting a numerical limit for dioxin in biosolids will make no detectable difference in the risk of cancer to the highly exposed farm family cannot be underestimated. This finding coupled with estimated 5 million dollar price tag of imposing a numerical limit should preclude EPA from further considering this option. Wastewater utilities are under considerable financial strain as it is. We cannot afford to spend resources that do not contribute to bettering the lives and health of our ratepayers, customers and other stakeholders.

The NODA points out that dioxin levels in biosolids are relatively consistent over time on a month-to-month basis. In addition the greatest variability appeared to be in the facilities with the highest dioxin concentrations. The general trend for dioxin concentrations in biosolids is downward. All of this suggests that frequent monitoring of dioxin levels is probably not necessary. We suggest that EPA invest its resources in coordinating a voluntary monitoring program. Facilities with likelihood or a history of high dioxin levels would be encouraged to monitor and investigate the sources of high dioxin levels. EPA's role would be to maintain technical expertise in testing and investigating sources of dioxin.

There does not seem to be any justification for treating small treatment works different than large treatment works with regard to numerical limits or monitoring

given that no measurable health benefit can be derived through imposition of numerical limits. There may be justification for providing expertise or low interest loans to small communities to conduct initial dioxin monitoring and follow up investigation if high concentrations of dioxin in biosolids are found.

We agree with EPA's methodology for assisting communities in identifying sources of elevated dioxins in biosolids. We believe that the methodology should be applied in a stepwise fashion. Step 1 should be the identification of potential sources of dioxin in the collection/services area. If elevated levels of dioxin are found than step 2 should be monitoring of the biosolids and comparison of the biosolids dioxin congener "finger print" to the "finger print" of known sources of dioxin. Step 3 would be the elimination of dioxin sources.

The Northwest Biosolids Management Association (NBMA) has recently completed a voluntary dioxin survey of biosolids produced by its members. This survey confirms that dioxin concentrations in biosolids in the northwest are similar to those found in the EPA 2001 dioxin survey and the AMSA 2002 dioxin survey. In addition the NBMA survey included some preliminary "finger printing" in attempt to identify sources of dioxin. Of the 22 samples analyzed 6 had dioxin concentrations greater than 30 ppt TEQ. Five of these samples had fingerprints consistent with sources containing PCB dielectrics and one consistent with pentochlorophenol. The majority of biosolids samples had dioxin congener fingerprints consistent with combustion-derived sources to storm water. Combustion derived sources are difficult to control making opportunities for significant reduction in dioxin concentrations minimal. It appears that lower levels of dioxin are generally derived from difficult to control non-point sources of dioxin. This is further justification for monitoring only cases where there is an identifiable potential source of dioxin.

The data and revised risk assessment presented in the NODA make a clear case that further regulation of dioxin in biosolids will be unlikely to produce a detectable change in lifetime cancer risk even to the highly exposed individual using conservative assumptions. A dioxin numerical limit would be a waste of public funds. We encourage EPA to pursue a voluntary monitoring program targeted at facilities that either have elevated levels of dioxin or have industries or other sources that might produce elevated levels of dioxin.

.

Sincerely,

David K. Hufford

Environmental Services, Wastewater Management Division Manager