

September 10, 2002

W-99-18 NODA Comment Clerk  
Water Docket (MC-4101)  
USEPA  
1200 Pennsylvania Ave., NW  
Washington, DC 20460

**RE: Standards for the Use or Disposal of Sewage Sludge: Notice of Data Availability (67 FR 40553-40576)**

Dear Comment Clerk:

The Water Environment Federation (WEF) respectfully submits the following comments on the above referenced Notice of Data Availability (NODA). Founded in 1928, WEF is a not-for-profit technical and educational organization with members from varied disciplines who work toward the WEF vision of preservation and enhancement of the global water environment. The WEF network includes more than 100,000 water quality professionals from 79 Member Associations in 31 countries. The Federation has been involved in activities related to the appropriate management and use or disposal of municipal sewage solids since its inception in 1928.

Members from WEF's Residuals and Biosolids Committee and Government Affairs Committee developed the following comments. These individuals are from both the private and public sector with experience in the management and beneficial use of biosolids.

In 1999, the Agency proposed a 300 parts per trillion (ppt) dioxin limit for land application of biosolids. In the NODA, EPA requested comments on the finding that setting such a limit would make no detectable difference in the risk of cancer to the highly exposed population and on the determination that no further action or rulemaking should be taken to regulate dioxins for land application. In addition, the Agency invited comment on whether a voluntary methodology should be used to identify, reduce, and eliminate sources of dioxin from entering wastewater facilities that contribute to occasional elevated levels of dioxin in sewage sludge.

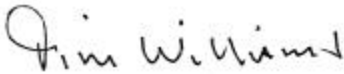
The NODA summarizes the new sewage sludge data and risk assessment for dioxin. Based on a revised risk assessment for land application of sewage sludge, the Agency estimated that the cancer risk from land-applied sewage sludge to the most highly exposed individuals, the farm family, is very low, ranging from  $2 \times 10^{-5}$  to  $1 \times 10^{-6}$ , using the current cancer slope factor. Consequently, the risk to the general

public is even lower. WEF believes that the risk assessment data supports taking no regulatory action for dioxins in land applied biosolids, however that does not imply that no action is being taken on the part of Publicly Owned Treatment Works (POTWs). Many POTWs currently monitor their biosolids for dioxins on a regular basis. WEF believes that a routine, mandatory testing regimen for dioxins should not be imposed on POTWs since the risk to human health and the environment is negligible. However WEF believes that POTWs should evaluate their biosolids for dioxins periodically and recommends that EPA encourage POTWs to utilize a voluntary approach. EPA should also consider conducting future surveys to insure that the data continue to support a non-regulatory approach.

WEF further believes the Environmental Management Systems (EMS) approach being developed by the National Biosolids Partnership (NBP) can serve as an effective mechanism to assist POTWs in monitoring dioxins. The EMS program is designed so that POTWs will seek continual environmental improvement and look for critical control points during the treatment process that can identify potential problems. The EMS program also requires an independent, third party verification in the form of an EMS audit that covers pretreatment, treatment, and use/disposal of biosolids at a POTW.

WEF looks forward to other opportunities to comment on EPA initiatives regarding the regulation of biosolids. If you have any questions regarding these comments, please contact Sharon Thomas, Manager of Regulatory Affairs, at 703-684-2423.

Sincerely,

A handwritten signature in cursive script that reads "Tim Williams".

Tim Williams  
Managing Director  
Government and Public Affairs