



**HRSD**

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W-99-18  
SS NODA  
III-D.22

September 5, 2002

SEP 5 2002

**Commissioners**

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

**Docket Clerk:**

Hampton Roads Sanitation District (HRSD) has reviewed the Notice of Data Availability for dioxin as published in the Federal Register Vol.67, No.113 on June 12, 2002 and has the following comments:

- D. R. Wheeler  
General Manager
- Edward D. Romm, P.E.  
Director of Engineering
- John A. Maniscalco, CPA  
Director of Finance & Administration
- Keith W. Benson, P.E.  
Director of Interceptor Systems
- G. David Waltrip, P.E.  
Director of Treatment
- Guy M. Aydtett  
Director of Water Quality

HRSD endorses EPA's response to previous public comments by obtaining new data via the EPA 2001 dioxin update of the 1988 National Sewage Sludge Survey. This initiative demonstrates EPA's commitment to use of reliable data to provide the public with an accurate risk assessment of dioxins in biosolids. HRSD supports EPA's position that numeric standards or management practices were not warranted for dioxin and dioxin-like compounds in biosolids that are disposed of in a surface disposal site or incinerator.

The differences in dioxin concentrations measured in the 2001 survey versus the 1988 survey confirms EPA's earlier assumption that levels of dioxins in biosolids are decreasing. HRSD believes these decreases are the result of effective pretreatment programs along with improved sampling and analytical methods.

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The use of three different substitution methods for calculating dioxin concentrations when a congener is below detection level supports the position that a zero should be used in the calculation. EPA states that the difference in the results using zero, one-half the detection level, and the detection level is not significant. Since this would not affect the risk to the public, HRSD recommends that a zero be used if a congener is below detection level. It would be an unnecessary burden to require increased monitoring for the sole reason that the detection level was used in the calculation. EPA has already established the guideline of using zero for determining averages of toxic pollutant when some of the data values are below detection. This recommendation would be consistent with established practices.

The Agency states that it considers risks in the range of one in a million to one in ten thousand are acceptable. The revised high-end risk estimate falls within this range and shows no measurable change in risk if a 300 ppt TEQ limit is imposed. The highly exposed farm family represents less than one percent of the population. The conservative factors that were used in determining the HEU's risk to dioxin

Notice of Data Availability for Dioxin - HRSD comments

Water Docket MC-4101

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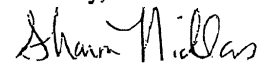
provide several magnitudes of protection to the general public. Based on this conclusion, HRSD recommends that no limit be imposed but monitoring be required at a frequency of once per five years.

HRSD recommends that a monitoring frequency of once per five years be imposed on all POTWs regardless of size. This would not be an unreasonable hardship on smaller facilities and would be protective of the communities they serve since most smaller facilities do not have pretreatment programs. While there can be variability and the occasional "spike" in dioxin levels, none of the elevated data values that were reported by EPA posed significant risks to the public. EPA also states that most of the increases in concentrations were short-lived.

In summary, HRSD believes that the data collection and risk assessment conducted by EPA supports the position that numerical limits are not warranted for biosolids that are land applied.

Please contact me at 757-460-4245 if you have any questions.

Sincerely,



Sharon Nicklas  
Permits Manager