Biosolids Recycling: A Safe Practice and Sound Science in the Public Interest

With any public policy, questions can be raised as to the public interests that the policy serves. The process by which policy is made in the United States, especially at the federal level, is so complicated, involves so many interests, and frequently is so participatory that a clear public interest easily can be obscured — either by design or not. The management of biosolids is a case in point.

It is clearly and indisputably in the public interest for municipalities to have safe, cost-effective biosolids management options available. These options include land application, incineration, landfilling, and surface disposal. In particular, the option of land application is supported by science as safe and effective — and by policy as desirable. Recycling wastewater treatment products makes sense not only economically but environmentally as well. This sense has been obscured recently by what can, at best, be termed "confusing" language and rhetoric surrounding a July 2002 report, *Biosolids Applied to Land: Advancing Standards and Practices*, by the National Academy of Sciences' National Research Council (NRC).

The NRC report offered no scientific documentation indicating inherent dangers in the use of biosolids in land applications authorized and regulated under Part 503 of the Clean Water Act. Nevertheless, it was couched in terms that could, by dint of ambiguity and lack of clarity, raise scientifically unwarranted doubts about the land application of biosolids. The U.S. Environmental Protection Agency (EPA) now has responded definitively to the NRC report and reiterated the scientific conclusions of the NRC committee: that the land application of biosolids, based on what we know scientifically, remains a viable and beneficial management option.

The EPA response, which was filed in the *Federal Register* for comment on April 9 (68 *FR* 17379), unequivocally sets the record straight and is reassuring in its certainty. Noting that the NRC report itself concluded that "there is no documented scientific evidence to indicate that the Part 503 rule has failed to protect human health," EPA corroborated this finding by acknowledging, "At this time, EPA has not identified any additional toxic pollutants that warrant regulation in sewage sludge."

Further, EPA reiterated its previous public support for including land application as a municipal solids management alternative by noting that "the Agency continues to believe that the land application of biosolids is an appropriate choice for communities when conducted in compliance with EPA regulations."

This, of course, does not mean that the subject is closed. The science of biosolids and land application has continued to evolve over the 10 years since the Part 503 rule was issued. That is a good thing, and the wastewater and biosolids community supports increased inquiry, especially in light of the strong EPA endorsement of land application. EPA has committed to further inquiry — not out of concern that there is evidence that such inquiry is needed, but because

there are areas in which our knowledge needs enhancing and because the public is better served by more comprehensive information.

This commitment is important because misinformation in the hands of the uninformed, the misinformed, or the outright malevolent has confused or frightened communities in some parts of this country to shy away from what are otherwise safe and viable public policies using the land application of biosolids. That misinformation consequently has thwarted rather than served the public interests in those communities.

In this context, the EPA comments are especially important for their common-sense restraint. In noting that the mere existence of a “pollutant” in municipal solids does not imply an adverse affect on either human health or the environment, EPA has noted that concentrations are critical elements to that evaluation. Specifically, “chemicals that have been detected in sewage sludge may only be present infrequently or in trace amounts...[and] the properties or degree of toxicity of such chemicals may make their presence, even in higher amounts, of little risk to human health or the environment.”

As is true in most science, truth and information are our friends. All current indications are that further inquiry will offer additional reassurance as to the viability and safety of land application of biosolids. Should it not, we want to know that too. The primary beneficiaries of the land application of biosolids are the public itself and its municipal governments. For them and for us, public health protection and environmental stewardship are paramount.

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