

Suggested Format for Letter to House Science Committee

Representative F. James Sensenbrenner
House Committee on Science
Rayburn House Building
Room 2332
Washington, DC 20510

Re: Hearing on "EPA Sludge Rule: Closed Minds or Open Debate"

I would like to provide you with my perspective regarding the process by which the above-referenced US EPA 503 Rule governing biosolids was developed. I have been involved in the management of biosolids since ___ (year) as (Describe involvement-e.g., generator, engineer, research, etc.). I am familiar with the background for the Rule and the extensive discussions among researchers and the Agency as the Rule was proposed and promulgated in 1993.

As noted in the Preamble to the Final Rule, thousands of pages of written comments were received and addressed. Beyond that, a Scientific Peer Review Committee consisting of many of the foremost independent researchers on environmental and agricultural aspects of biosolids use were directly involved in an ongoing dialogue with EPA regarding the data and risk calculations that constitute the Final Rule. An extensive review by the National Academy of Science's National Research Council was also conducted. Both of these reviews provide overwhelming evidence that the 503 Rule was based on the best science available.

Knowing, as I do, the extensive and detailed discussions surrounding the 503 standards, I firmly believe that the best available scientific information was incorporated into these standards. While scientific opinion, like any other, encompasses a broad range of viewpoints, the Agency received and assessed input reflecting those viewpoints. Since the promulgation of the Rule, some individuals have expressed concerns about the scientific validity of the 503 standards. Many of the questions raised by these individuals were addressed by the Peer Review Committee's input to 503, and have been thoroughly discussed in the support documents, which are extensive and complex. I believe that a thorough review of these documents will convince an objective individual that the regulatory standards and conclusions are valid and highly protective and conservative.

The implications of a finding by your committee that cast doubt on this rule-making process and its results could be devastating to public confidence in the many biosolids management programs conducted by thousands of municipal facilities that treat wastewater throughout the country. There would likely be severe negative consequences to the environment and ratepayers if such programs were stopped due to misconceptions and erroneous opinions about the federal regulatory standards. While there is always room for improvement in terms of additional information gathering and operational practice, it makes no sense to abandon what currently rests on firm scientific and operational ground.

I believe my comments reflect the vast majority of opinion of those involved in biosolids management, and I urge you to base any conclusions you reach on information and facts, not rhetoric and opinion.

I request that this letter be made part of the formal hearing record.

Respectfully,