12/4/07 Bd. Mtg.
Water Recycling Policy
Deadline: 10/26/07 by Noon

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To: <commentletters@waterboards.ca.gov>
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Sewage Sludge and Reclaimed Water

Treated sewage sludge or municipal wastewater that is treated is known as reclaimed water. In the report, "Recycling Sewage Sludge into Compost Is Safe and Effective," the National Research Council states that reclaimed water is not related or significant to food contamination, and can be used safely to irrigate crops on farmland. They believe that using reclaimed water not only will improve the quality of the soil, but it will also help save the water resource and dispose of contaminants. They argue that the remaining contaminants of treated wastewater, which are referred to as sewage sludge, can be safely used for fertilization. However, there are opposing views and safety precautions.
Valid concerns are raised in regards to environmental, and safety issues that must be addressed. Although "the agricultural use of sludge seems to be very cost effective and accounts for 36 percent of disposal, and reclaimed water accounts for a small portion of agricultural irrigation"(2), restrictions were slowly placed on where to dispose of sewage sludge. Disposing of sewage sludge into the ocean is no longer allowed, and many cities are having to ship it elsewhere for disposal. In the "Part 503 Sludge Rule," the U.S. Environmental Protection Agency limits what proper contaminate levels must be in order to permit land application of sewage sludge based on risk assessment, and places regulations that reduce the contaminants in reclaimed water. Contaminant levels allowed depend on the chemical, and soil properties of the sewage sludge. The report explains adding reclaimed water or sewage sludge to soil, lessens toxic organic materials to a small enough amount where it can be disregarded as harmful(4-5). Reclaimed water that has harmful trace elements does not have human health criteria, but wastewater treatment processes are trusted. Despite the safety standards set on the use of sewage sludge, the public generally accepts the use of reclaimed water on crops, but on the contrary, the use of sludge to fertilize has not been widely agreed upon by the public(3). At the end of the article, the National Research Council agrees that not using wastewater, and sewage sludge at all would assure complete safety. They argue that current technology, and safety limits allow a safe way to dispose, and reuse wastewater.
Many citizens present reasons against what the National Research Council states, and I do as well. This all seems so unsafe and awkward. I find it strange that the U.S. Environmental Protection Agency placed limits on what the proper contaminant levels of sewage sludge should be in order to use for fertilizing agriculturally, while they don't do the same for the use of reclaimed water on irrigating crops. They also base sewage sludge on risk assessment, although with reclaimed water they just trust the treatment processes. I feel only trusting, and not examining reclaimed water to be dangerous because the reclaimed water is actually placed onto the crops, and also helps them grow. Both have toxic organic materials that strengths supposedly disappear in the soil; I do not believe that it just lessens and disappears. The toxic organic materials have to go some where, and if you notice the article just states they degrade over time. Where do the toxins actually go? How long does it take the toxins to lessen to a non-poisonous state when placed on the soil? Does the sewage sludge plus reclaimed water create a toxic level higher than when just alone? Why is dumping sewage sludge into the ocean against regulations, but yet using it to fertilize is okay? The report does not go into detail or state these things.
This report leaves me to feel that this subject has not been properly researched because there are too many unknowns. The report seems incomplete, and does not give enough information. The National Research Council seem to sugar coat things, and they give a biased report. I feel they only think their way is right, and they only list the pros. I am not sure whether it was their negligence, failure to research, or failure to state. The only statistics they state in the article is the percent that dispose of sewage sludge agriculturally. They do not mention statistics of how many people get sick from eating crops that have grown ecoli from the bacteria. The report also does not state what can happen if toxin levels were too high, how sick people can get, what can happen to them, and what are the symptoms of getting sick from contaminants. I know from the news that there have been reports of ecoli on crops. Crops get recalled,

and people get sick from it, again they fail to mention it in the report.

There are other ways to fertilize soil that are safer, like the use of decaying vegetable peels, grass clippings, and leaves. The fact that it is cost effective, and the concern for conserving should have no bearing on using toxic wastewaters instead of other ways that cost more, but are safer. It seems they are over looking citizens safety, and it is like money over matter. I think that conserving the water supply is a great idea, but they need to find another way to do so that is in a safer manner. The National Research Council need to keep researching, or at least test the waters more before using them to fertilize on soil that grow crops, and irrigate crops that people eat. As much as this article tries to persuade it is safe to use reclaimed water and sewage sludge, I do not fall for it. The fact that I find it hard to trust, and eat crops now after reading this article is sad. There are great chances that they will fertilize the soil, and irrigate crops with a toxin level higher than what it is supposed to be and poison humans when they eat these crops. They think that technology, and conserving water will save the day. I think this will just create more problems with crop supplies, and based on this article I do not believe that using sewage sludge, and reclaimed water to be effective, or worth while to citizens. Safety is first in my eyes, and this article makes me feel unsafe. If you would like to see a copy of the report that I read from the National Research Council, I can get a copy. I hope that you take my concerns and points into consideration for the new proposed water recycling policy.

A concerned citizen,

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