



Association of
Metropolitan
Sewerage Agencies

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July 25, 2000

Linda Rosenstock, M.D., M.P.H.
Director
National Institute for Occupational Safety and Health
Hubert H. Humphrey Bldg.
200 Independence Avenue, SW
Room 715-H
Washington, DC 20201

Dear Dr. Rosenstock:

The Association of Metropolitan Sewerage Agencies (AMSA) recently learned of National Institute for Occupational Safety and Health's (NIOSH) intent to issue a Hazard Identification Report regarding Class B biosolids and worker safety. AMSA represents the interests of nearly 250 of the country's publicly-owned wastewater treatment agencies, which collectively serve the majority of the sewered population in the United States, and generate and treat more than 75 percent of the biosolids produced each day. Over the past 30 years, AMSA has maintained a close working relationship with both Congress and the U.S. Environmental Protection Agency (EPA) in the development of environmental legislation and policy making. In addition to their primary responsibility for treating the Nation's domestic and industrial wastewater, AMSA member agencies play a major part in their local communities, often leading watershed management efforts, promoting industrial/household pollution prevention, and advancing public involvement and education in the wastewater industry.

AMSA members have implemented numerous activities related to the appropriate management and use or disposal of municipal solids, and have a keen interest in the safety and protection of workers in the handling and application of biosolids. We have serious concerns, however, regarding the review process NIOSH has undertaken with respect to this Hazard Identification Report. We do not understand why NIOSH has not solicited

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review outside government agencies, despite the potential impacts the report may have on the wastewater and biosolids reuse industry. Media reporting, such as the *USA TODAY* story on April 13, 2000, has alarmed many of our members and the public, and has left us unable to answer questions concerning the report, despite our repeated requests for a draft copy from NIOSH.

AMSA is concerned that issuing a "Hazard" report will suggest wide-spread problems and result in the public perception of Class B biosolids similar to that which exists for hazardous wastes. These types of negative perceptions are detrimental to the reuse of biosolids, overstate the need for concern based on a limited NIOSH investigation, and undermine the national performance goal of increased biosolids reuse. AMSA advocates the use of appropriate personal hygiene and generally available personal protective equipment, but urges that any further precautions be researched and advocated only after review by EPA and the industries affected. If data from previous reports indicate the need for more research, and NIOSH's intent is to make recommendations for further action, AMSA recommends that NIOSH transmit their findings to EPA directly in the form of a letter. EPA could then include the health and safety of Class B biosolids workers into their research agenda.

We request a meeting with you and your staff to discuss the content of the report, NIOSH's plans for issuing it, the data used to develop the recommendations, and the potential ramifications of the report to the wastewater industry. We understand that the Water Environment Federation (WEF) is also requesting a meeting with you to discuss the document. We urge a joint meeting of NIOSH, AMSA and WEF to address our concerns.

If you have any questions, please contact me at 202/833-4653. We look forward to a positive response to our meeting request.

Sincerely,

A handwritten signature in black ink that reads "K Kirk". The "K" is large and stylized, followed by "Kirk" in a cursive script.

Ken Kirk
Executive Director

cc: Rosemary Sokas, NIOSH
Chuck Fox, U.S. EPA
Rob Fairweather, Office of Management and Budget
Al Gray, WEF