



Association of
Metropolitan
Sewerage Agencies

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March 15, 2004

Honorable Arthur G. Baggett Jr., Chair
California State Water Resources Control Board
P. O. Box 100
Sacramento, California 94812-0100

Re: **State Water Resources Control Board (SWRCB) Draft Revised
Statewide Program Environmental Impact Report (PEIR)
Covering General Waste Discharge Requirements for Biosolids
Land Application (January 2004)**

Dear Chairman Baggett and Members of the Board:

The Association of Metropolitan Sewerage Agencies (AMSA)¹, on behalf of its more than thirty members in California, appreciates the opportunity to comment on the California State Water Resources Control Board (SWRCB) Draft Revised Statewide Program Environmental Impact Report (PEIR) Covering General Waste Discharge Requirements for Biosolids Land Application (Modified General Order). As generators of biosolids, AMSA's members are responsible for finding environmentally safe and cost effective ways to manage millions of tons of biosolids every year. The PEIR and re-adoption of the Modified General Order will provide a uniform regulatory process and allow AMSA's members in California to continue biosolids land application in an environmentally safe and beneficial manner.

Land application of biosolids continues to be one of the most viable and environmentally sound management options for many communities in the United States. The U.S. Environmental Protection Agency (EPA), in its response to the National Research Council's 2002 report² on the technical

¹ Founded in 1970, AMSA represents the interests of nearly 300 of the nation's publicly owned wastewater utilities. AMSA members serve the majority of the sewered population in the United States and collectively treat and reclaim over 18 billion gallons of wastewater every day.

² *Biosolids Applied to Land: Advancing Standards and Practices* (NRC, 2002)

Letter to California SWRCB

March 15, 2004

Page 2

basis of the 40 CFR Part 503 biosolids regulations , reaffirmed its long-standing position that “the land application of sewage sludge in compliance with EPA’s regulations is an appropriate choice for communities” and reiterated the most prominent conclusion of the NRC report that there is no scientific evidence that the Part 503 regulations have failed to protect human health. AMSA understands from its members in California that the Modified General Order not only incorporates all of the Part 503 requirements but also adds numerous requirements and restrictions that are more stringent than the federal regulations in order to further protect California’s unique environment. AMSA believes that such an approach is an effective way to provide uniform requirements throughout the state that are protective of human health and the environment, while also streamlining the regulatory process.

AMSA also understands that the Modified General Order would govern the land application of both Class B and Class A biosolids , preserving both of these management options for California’s wastewater treatment agencies. AMSA believes this approach is consistent with the scientific foundation of the Part 503 regulations and represents the most sound policy decision for both the environment and the biosolids management community.

AMSA urges the SWRCB to consider the findings of the Draft Revised PEIR that identify the Modified General Order as the environmentally superior alternative and re-adopt the General Order.

Sincerely,

A handwritten signature in black ink, appearing to read "K Kirk". The signature is written in a cursive, somewhat stylized font.

Ken Kirk

Executive Director

CC: Mr. Gary Carlton, SWRCB Board Member
Mr. Richard Katz, SWRCB Board Member
Mr. Peter Silva, SWRCB Board Member
Ms. Nancy Sutley, SWRCB Board Member