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March 22, 2002

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Frank J. Hearl, P.E.
Deputy Director, Division of Respiratory Disease Studies
National Institute for Occupational Safety and Health
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1095 Willowdale Road
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Secretary
William B. Schatz
General Counsel
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Cleveland, OH

Executive Director
Ken Kirk

Dear Mr. Hearl:

Thank you for providing the Association of Metropolitan Sewerage Agencies (AMSA) with the opportunity to comment on the draft National Institute for Occupational Safety and Health (NIOSH) guidance entitled *Controlling Potential Risks for Workers Exposed to Biosolids*. We were pleased to learn that your office is considering issuing the guidance as a replacement for NIOSH Hazard ID #10, *Workers Exposed to Class B Biosolids During and After Field Application*. As you may remember, AMSA's comments on HID #10 commended your agency for endorsing standard personal hygiene practices and the use of personal protective equipment where needed to prevent potential health problems in workers handling Class B biosolids. As we noted, the recommended practices in the report are already routinely administered at the vast majority of publicly owned treatment works (POTWs) to ensure workers are adequately protected.

Unfortunately, many stakeholders continue to mischaracterize the intent of Hazard ID #10 and use the report as evidence that the land application of Class B biosolids should be prohibited. Clearly this misuse of the report was not intended. AMSA believes the new guidance, as a replacement for HID #10, will serve to ensure worker safety without overstating any potential risk. For clarification, AMSA suggests that NIOSH provide a brief explanation of why the Hazard ID is being replaced.

The draft guidance is well balanced and logically organized. It provides background information on how biosolids are used and regulated, and outlines recommendations

for ensuring the protection of workers managing Class B biosolids. The guidance is consistent with good personal hygiene practices and recognized personal protective equipment procedures.

AMSA recommends the following changes/additions to the guidance:

- Page 2: “During a NIOSH field investigation at a biosolids land application and storage site:” Recommendation: change to read “During a NIOSH field investigation at one biosolids land application and storage site, which did not comply with EPA requirements, the following was observed:”
- Page 3: “NIOSH is not aware of published studies that have examined the extent of worker exposure to Class B biosolids.” AMSA is aware of a number of studies evaluating treatment plant worker exposure to biosolids that may prove useful. AMSA will follow up with NIOSH to provide additional information on these studies.

AMSA is concerned with one of the draft recommendations regarding good environmental practices to prevent and minimize occupational exposures. While we agree that eliminating the hazard may be the most effective control for typical occupational safety and health hazards, the suggestion that POTWs can simply substitute Class A for Class B does not reflect the complex issues that govern an agency’s decision to use Class A or Class B. In addition to the economic factors that may limit an agency’s ability to achieve Class A quality, POTWs must consider local market conditions and determine whether the lower nutrient content of Class A will meet end user needs.

AMSA also calls your attention to the comments prepared by the Water Environment Federation (WEF), dated March 22, 2002. AMSA concurs with the recommended changes offered by WEF.

We appreciate your consideration of AMSA’s comments as you finalize the guidance. Again, we would encourage you to issue the guidance, as revised, as a replacement for HID #10. If you have any questions or would like to discuss this issue further, please contact Chris Hornback of my staff at 202/833-9106.

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