



Association of  
Metropolitan  
Sewerage Agencies

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Ken Kirk

January 30, 2004

Attention Docket ID No. RCRA-2003-0005  
OSWER Docket  
EPA Docket Center, MC 5305T  
U.S. Environmental Protection Agency  
1200 Pennsylvania Avenue, NW  
Washington, DC 20460

Re: *Comprehensive Procurement Guideline V for Procurement of Products  
Containing Recovered Materials*; 68 *Fed. Reg.* 68813 (December 10, 2003)

Dear Sir or Madam:

The Association of Metropolitan Sewerage Agencies (AMSA) is pleased to provide comments on the U.S. Environmental Protection Agency's (EPA's) *Comprehensive Procurement Guideline V* and *Recovered Materials Advisory Notice V*. Founded in 1970, AMSA represents the interests of nearly 300 of the nation's publicly owned wastewater utilities (POTWs). 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. As generators of treated sewage sludge, or biosolids, AMSA's members are responsible for finding environmentally safe and cost effective ways to manage millions of tons of biosolids every year. The use of biosolids as compost or fertilizer continues to be one of the most viable and environmentally sound management options for many communities in the United States.

AMSA commends EPA for proposing to revise its current compost designation to include composts made from manure or biosolids and for designating fertilizers containing recovered organic materials, which may include biosolids, as an item whose procurement will carry out the objectives of section 6002 of the Resource Conservation and Recovery Act or RCRA. As you know, section 6002 of RCRA and Executive Order 13101, which establishes the procedures EPA must follow when implementing RCRA section 6002, leverage the purchasing power of the

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federal government to further encourage the use and production of products containing recovered materials. AMSA strongly supports EPA's inclusion of biosolids containing compost and fertilizer in the Agency's Comprehensive Procurement Guidelines, as it will not only serve to increase the demand for these recovered material products, but will also provide further support for the long-standing practice of biosolids land application.

As stated in the December 10, 2003 *Federal Register* notice announcing the revisions, the nation's 16,000 POTWs generate approximately 7 million tons of sewage sludge annually. The practice of applying these biosolids to land as a fertilizer or soil amendment has been proven both safe and beneficial. In fact, the National Research Council recently concluded that there is no scientific evidence that the Part 503 regulations governing the management of biosolids have failed to protect human health and EPA's Office of Water reaffirmed December 31, 2003 (68 *Fed. Reg.* 75531), that "the land application of sewage sludge in compliance with EPA's regulations is an appropriate choice for communities." The use of biosolids on farm land produces a significant improvement in crop growth and yield and reduces the need for chemical fertilizers. Increased biosolids recycling enables local governments to further market biosolids products, providing farmers with a viable, cost effective alternative, and helping to offset the costs of ensuring clean water for their citizens. The inclusion of biosolids used as compost or fertilizer in the Agency's Comprehensive Procurement Guidelines expands the market for these recovered materials and further improves the long-term viability of this environmentally beneficial practice.

We appreciate the opportunity to comment on the proposed revisions to the Comprehensive Procurement Guidelines. If you have any questions please do not hesitate to contact Chris Hornback, AMSA's Director of Regulatory Affairs at 202/833-9106 or via email at [chornback@amsa-cleanwater.org](mailto:chornback@amsa-cleanwater.org).

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