

Biosolids Facts

1. Land applied municipal sewage sludge is NOT humanure. Humanure is material generated in a composting toilet. Typical sludges generated in urban industrial centers contain tens of thousands of man-made chemical compounds from hospitals, industry, institutions, businesses, landfills and households who discharge into sewers. Most of these chemicals, including radioactive material, are neither monitored nor regulated. Many of them are highly toxic and persistent pollutants.
2. Over a hundred environmental, farm, health, food processing organizations, including the Sierra Club—see www.sierraclub.org/policy/conservation/LandApplicationSewageSludge.pdf-- oppose using sludge as fertilizer or soil amendment, because there is no real science that supports the current regulations governing this risky practice. These organizations have warned that the current policies do not protect human health, agricultural productivity, or the environment. Twice in the last five years, a coalition of the nation's leading health, farm, and environmental organizations, have petitioned the EPA to put a moratorium on spreading sludge on farmland, pastures, and forests.
3. Other major scientific organizations have questioned the science behind the current land application policies. Among these organizations are the American Association for the Advancement of Science, the National Academy of Sciences, the National Research Defense Council, the Cornell Waste Management Institute, the Environmental Research Foundation, the Science and Environmental Health Network, and the Center for the Science of Biological Systems
4. Thirty years ago, EPA narrowed the scope of the Resource Conservation and Recovery Act (RCRA) and exempted sewage sludge and other industrial residuals from many hazardous and solid waste regulations, so that these materials could legally be "recycled" as fertilizer. In 1986, Congress legalized, through the Domestic Sewage Exclusion (1004 [27] of RCRA) the dumping of hazardous wastes into sewers. The current regulations permit every business, institution, and industry in the country, every month, to pour 33 pounds of hazardous waste into the nation's sewers.
5. Last year, the US Department of Agriculture awarded a Georgia dairy farmer disaster relief funds when a court ruled that sludge used as fertilizer was responsible for killing hundreds of his cattle, contaminating milk, and polluting his land so that he was no longer able to grow food crops. (See United States District Court Southern District of Georgia, *McElmurray v. U.S. Department of Agriculture*, Case 1:05-cv-00159-AAA-WLB Document 67, Filed 02/25/2008.)

6. Sewage treatment plants were not designed to produce fertilizer. They were designed to remove pollutants from the wastewater, which, by necessity, concentrate in the resulting sludge. That is why the Federal Clean Water Act defines sewage sludge as a pollutant.
7. There is no published peer reviewed paper that indicates that spreading sludge on land is beneficial, sustainable, or safe. The EPA Inspector General stated that the agency has not done even the basic research to assess the risks of land application. A 2002 National Academy of Science panel warned that treated sewage sludge is such a complex and unpredictable mix of biological and chemical wastes, that its risk, when used for farming, can not be reliably assessed. New data, documented in the recent scientific literature, confirm the many reports of serious sludge-related illnesses, animal mortalities, and groundwater pollution.
8. EPA's Office of Water has worked closely with the sludge industry and its lobbying groups to use tax dollars to cover up these many incidents. These entities falsely assure farmers, property owners, public officials, and the media that land application is completely safe and supported by "real science." For a peer reviewed paper that documents how EPA works with industry-friendly scientists to promote land application, discredit critics who do not agree, and covers up serious sludge incidents, see <http://www.ijoh.com/index.php/ijoh/article/view/278/238>

Caroline Snyder Ph.D.
Citizens for Sludge-Free Land
www.sludgefacts.org
603-284-6998