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December 4, 2018

Charles J. Sheehan
Acting Inspector General
U.S. Environmental Protection Agency
Office of Inspector General
1200 Pennsylvania Avenue, N.W. (2410T)
Washington, DC 20460
Via Email: Sheehan.charles@Epa.gov

Dear Acting Inspector General Sheehan,

The National Association of Clean Water Agencies (NACWA) represents more than 300 public clean water utilities who treat and reclaim the majority of the wastewater generated each day across the US. NACWA's members are on the front lines of protecting human health and the environment and take seriously their responsibilities to treat wastewater and manage the residuals from the treatment process in a safe and sustainable manner. NACWA and its members participated in the Office of Inspector General's (OIG) project entitled "Evaluation of EPA's Controls Over Land Application of Sewage Sludge" with the hope that the final report might provide a balanced assessment of where the program has been successful – as evidenced by decades of managing biosolids safely and beneficially – and where program improvements could be made.

Unfortunately, NACWA was disappointed by the alarmist nature of the OIG's final report and the OIG's apparent lack of awareness of the substantial amount of research that has been done on the beneficial use and safety of biosolids. Much of what needs to be said about where the OIG report went wrong has already been said in either EPA's response to the draft report or in other letters sent by stakeholders after the final report was released. Most disappointing to NACWA, however, is the fact that the tone and erroneous statements regarding risk in the report undermine the numerous recommendations that provide thoughtful insights into where improvements to the program can be made, consistent with the original intent of the OIG investigation. EPA is already working to address many of the recommendations and NACWA looks forward to engaging with the Agency to provide data and information as needed to complete that work.

NACWA and its members willingly engaged with OIG and in some cases welcomed OIG staff to their facilities with the understanding that the OIG was conducting a thoughtful examination of whether improvements to the program could be made. Unfortunately, the OIG's report perpetuates the mis-information around the practice of land application, highlights OIG's lack of understanding of the program and immediately soured the entire investigation process for our members.

Despite the missed opportunity by OIG to provide a thoughtful, objective assessment of the land application program, NACWA and its members stand ready to work with the EPA biosolids program office to continue its efforts to conduct additional risk assessments and respond to those OIG recommendations that provide productive suggestions for continued improvement.

NACWA is confident that this additional research and study will continue to document the safety of this program and underscore its value as a sustainable way to manage these resources. We strongly support and encourage EPA's ongoing investment in this work to further ensure the biosolids regulations remain protective of human health and the environment.

Sincerely,

A handwritten signature in black ink that reads "Adam Krantz". The signature is written in a cursive style with a prominent flourish at the end of the name.

Adam Krantz
Chief Executive Officer

cc: Dave Ross, Assistant Administrator, Office of Water, US EPA
Deborah Nagle, Director, Office of Science and Technology, Office of Water, US EPA
Elizabeth Rezek, Biosolids Program Manager, US EPA