



# CALIFORNIA ASSOCIATION of SANITATION AGENCIES

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May 18, 2010

The Honorable Peter Silva  
Assistant Administrator  
USEPA, Office of Water  
Ariel Rios Building  
1200 Pennsylvania Avenue  
MAIL CODE: 4101M  
Washington, DC 20460

Dear Assistant Administrator Silva:

On behalf of the California Association of Sanitation Agencies (CASA), I am writing to request that your office reaffirm support for the appropriate beneficial uses of biosolids in compliance with land application and public distribution regulations issued by EPA. CASA represents more than 90 percent of California's sewer population and has long been a proactive voice for scientific solutions and best management practices for wastewater treatment, recycled water, biosolids management and more recently, on climate change issues.

A coordinated effort to call into question biosolids compost programs for use by private citizens, community gardens and public parks has created unfounded and unsubstantiated concerns over the safety of these regulated materials. The Center for Food Safety (CFS), Resource Institute for Low Entropy Systems (RILES) and Organic Consumers Association (OCA) represent some of the interests involved in this debate. In 2003, CFS petitioned EPA to impose a moratorium on the land application of biosolids. Then-Assistant Administrator Tracy Mehan denied the CFS request with a lengthy response to all of the allegations. Unfortunately, EPA's decision not to impose a moratorium did not bring to a close the effort to eliminate these biosolids management options.

CASA is deeply concerned over the policy implications of a petition made last fall to the City of San Francisco. The petition sought to end their community biosolids compost giveaway program and had the effect of creating public perceptions that biosolids management practices are inappropriate. This effect was amplified by an EPA employee, portrayed as an agency spokesman in media interviews, who repeatedly called biosolids unsafe and hazardous.

CASA respectfully requests that EPA provide a strong public statement of the Agency's official position and reaffirm its biosolids management policy. We seek to educate the public about the safety of current practices that are subject to strict regulatory compliance standards.

CASA would be pleased to offer any additional information or assistance to address our concerns. Please let me know if you have any questions or need further clarification of the issues. Thank you in advance for your consideration of this request.

Sincerely,

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Ensuring Clean Water For California