NACWA
A Clear Commitment to America's Waters

Testimony

of

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On Behalf of

The National Association of Clean Water Agencies
(NACWA)

Oversight on the State of Science and Potential Issues Associated with EPA's Sewage Sludge Program

Senate Environment & Public Works Committee
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My name is Leland Myers and I am general manager of the Central Davis Sewer District in Kaysville, Utah. I am testifying on behalf of the National Association of Clean Water Agencies (NACWA), which represents the interests of municipal wastewater treatment agencies nationwide. NACWA's statement is attached to my written testimony. NACWA members are dedicated environmental stewards who work to carry out the goals of the Clean Water Act and who treat and reclaim more than 18 billion gallons of wastewater each and every day.

My public agency is a small district serving the wastewater collection and treatment needs of just under 50,000 people in three cities. We have 12 employees who work at the District in operations, maintenance, and management of the wastewater collection system and treatment plant. We are primarily a residential community but we do have some commercial and industrial dischargers who are managed under our industrial pretreatment program. In 2004 our district was awarded the national first place Clean Water Act Operations and Maintenance Excellence Award and also the National Biosolids Excellence Award. In 2007, the NSF International performed a third-party inspection of our Environmental Management System and in November of that year, Central Davis became the first in Utah and the 18th in the nation to achieve certification by the National Biosolids Partnership.

As a kid growing up I used to love watching the Honeymooners. As you may or may not know, Ed Norton, a character in the show, worked in the sewer and in one episode sang the "Song of the Sewer." The first verse states:

I work in the sewer it's a very hard job,
You know they won't hire just any old slob.
You don't have to wear a tie or a coat,
You just have to know how to float.

Today's sewer worker needs to know a little more than just how to float. Each day Central Davis receives about 6 million gallons of wastewater. That wastewater carries tons of organic waste and nutrients that must be removed in order to ensure the discharge does not cause impairment to the beneficial uses of our receiving water, the Great Salt Lake. Our treated effluent is discharged to the Great Salt Lake and provides wetland habitat for millions of shore birds and water fowl. In the wastewater treatment process, we remove a lot of carbon that must be placed somewhere. Logically, there are only three receptors for the carbon.

First, we could leave it in the water, realizing this would cause significant harm to the downstream ecosystem.

Second, we can transfer all that carbon to the atmosphere by burning our biosolids, which would release CO2 and a few other byproducts. This obviously would increase our carbon footprint and thus our contribution to global climate change.

Finally, we can place it in the ground. One option is to put our biosolids in landfills where they can slowly anaerobically digest and release methane — a potent greenhouse gas — to the atmosphere. Alternatively, we could beneficially reuse and sequester the carbon through the land application of biosolids and increase the organic content of the soil to provide nutrients for crops.

We have chosen the latter option — beneficial reuse — as the most environmentally responsible solution based on current technology.

The Central Davis Sewer District wastewater treatment plant employs a split biological system for treatment of the waste stream using both attached growth and extended aeration suspended growth systems. We achieve an effluent quality which exceeds all National Pollutant Discharge Elimination System (NPDES) permit requirements with an average five day BOD of 11 parts per million (ppm), an average suspended solids of 7 ppm, a total nitrogen of about 11 ppm, and a total phosphorus of a little higher than 2 ppm.

Waste residuals are treated using anaerobic digestion which produces an exceptional quality Class B biosolid which is land applied to farm fields immediately surrounding our treatment facility. These farm fields are owned by the district and have restricted access. Some of the treated residuals are composted to a class A standard using the windrow compost method.

Our Class B biosolids supply nutrients and carbon that allow us to grow hay, which we sell to local horse owners or residents with a few head of cattle. We never have enough hay to meet the demand.

Class A compost is screened and sold to citizens at a reasonable price and is used in many of the yards and gardens of the $500,000 to $2,000,000 homes surrounding our treatment plant and land application site. The attached picture shows our location and neighborhood. Word of mouth advertising creates a demand for our product which far exceeds our production capacity.

I personally believe the beneficial reuse of biosolids as a soil amendment is the most prudent use of the resource. I have provided written testimony outlining why I believe this.

I am not a world renowned scientist who has researched this issue, but I have read the research of many who are. The preponderance of evidence suggests this practice is safe.

I use our district's compost extensively at my house in my landscaping and gardens (see attached picture). My sons use it at their houses in their gardens and yards. My grandchildren play in the dirt and compost mixture. If I didn't believe it was safe, I wouldn't use it as I do.

Again, we strongly believe there is sufficient science supporting the land application of biosolids. Some in Congress and elsewhere believe that additional scientific studies should be done. Certainly NACWA supports ongoing efforts to analyze and further demonstrate that the land application of biosolids is safe, environmentally sound, and practical. If the Congress believes more study is needed, we would recommend the allocation of federal funds to conduct these studies to further ensure that land application is safe and to obtain a definitive answer to any lingering questions.

Oh, and if you are in the mood to throw a bunch of money at the biosolids safety issue, throw a bunch, too at pharmaceutical and personal care product fate and effect research. This is an area in which, today, we really just know how to float!

Top – Central Davis Sewer District
Bottom – Myers Home