

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY WASHINGTON, D.C. 20460

DEC 23 2003

Julie L. Gerberding, MD, MPH
Director
Centers for Disease Control and Prevention
1600 Clifton Rd.
Atlanta, GA 30333

Dear Dr. Gereberding:

I would like to request that the Centers for Disease Control and Prevention (CDC) review the available information on reported human health effects from the land application of treated sewage sludge. I am making this request in response to an overarching recommendation made by the National Research Council (NRC) of the National Academy of Sciences after their review of EPA's Part 503 sewage sludge regulation.

In July 2002, the NRC published a report entitled, "Biosolids Applied to Land: Advancing Standards and Practices" that examined the technical basis of EPA's Standards for the Use or Disposal of Sewage Sludge (CFR Regulations Title 40, Part 503). Among the NRC's findings was that while there is no documented scientific evidence that the Part 503 rule has failed to protect public health, persistent uncertainty exists about the potential health impacts of land application of sewage sludge, and additional research and investigation are warranted to reduce these uncertainties.

Near the top of the NRC's recommendations was the development of protocols for systematic human health incident reporting, tracking, investigative follow-up and a data repository system. While the reports to date of adverse health effects are largely anecdotal, we believe they are important and warrant review by appropriate qualified health experts. Because CDC already has in place the expertise and tools to conduct human health incident reporting, tracking and follow-up investigations, we are asking for your assistance. Review of the reports by CDC would be a first step to addressing this NRC recommendation, and would determine the need for more in-depth steps, such as those recommended by the NRC. Should additional investigative or tracking steps be warranted, we believe that CDC is uniquely qualified to conduct such efforts.

Furthermore, we feel this effort is a tremendous opportunity for collaboration as envisioned by the goals of the Memorandum of Understanding (MOU) between EPA and the U.S. Department of Health and Human Services (HHS) signed September 2002 by our two agencies. The MOU specifically calls for EPA and HHS to work together to advance efforts to achieve mutual environmental public health goals and to strengthen the bridge between the

environmental and public health communities. The MOU also states that HHS and EPA will work to share timely and reliable environmental and public health data to ensure informed decision making and appropriate response to emergency situations. We have already informally initiated dialogue on possible CDC assistance on evaluating human health incidents reports involving land application of biosolids with Dr. Henry Falk and staff in NCEH. Based on the frequency and intensity of complaints we receive regarding the human health effects of land applied sewage sludge, we feel the issue is an important priority for both of our agencies.

Thank you for your consideration of our request, and I look forward to your reply. If you would like further information, please contact Pamela Barr, Deputy Director for the Office of Science and Technology in the Office of Water (202-566-0430) or Kevin Teichman, Director of the Office of Science Policy in the Office of Research and Development (202-564-6705).

G. Tracy Mehan, III

Assistant Administrator

Office of Water

Sincerely,

Paul Gilman

Assistant Administrator

Office of Research and Development