



**ORANGE/CHATHAM SIERRA CLUB**

P.O. Box 1303

Chapel Hill, NC 27514

[www.sierraclub.org/ocg/](http://www.sierraclub.org/ocg/)

To: NC Division of Water Quality c/o Ed Hardee  
Aquifer Protection Section/Land Application Unit  
1636 Mail Service Center  
Raleigh, NC 27699-1636

We are writing to support the request of the Blue Ridge Environmental Defense League for measures to regulate the application of Burlington's sewage sludge on land in six counties. These are reasonable measures in light of the fact that treatment plants are generally designed to remove pollutants from wastewater, thus producing cleaner water but leaving many chemical and biological pollutants concentrated in sludge, potentially including carcinogens, toxic metals, hormone-disrupting chemicals, dioxins, radionuclides, and other persistent bioaccumulative poisons.

We particularly affirm the Blue Ridge Environmental Defense League's fourth, fifth, and seventh measures. The fourth request is to "increase setbacks for sewage sludge applications near residences, schools, churches, adjoining properties, private wells, and surface waters." The fifth urges that the sewage sludge "be deeply incorporated into soil to reduce potential exposure and curb runoff." Even if treatment removed all harmful substances leaving only nutrients such as nitrogen and phosphorus, sludge might still be a danger to surface waters impaired by excess nutrients. Those of us in the Haw River watershed, who are under federal mandate to reduce nutrient pollution in Jordan Lake, are especially aware of the dangers of runoff. But given that sludge might also have enough chemicals to warrant the Federal Clean Water Act's defining it as a pollutant, greater setbacks, deeper incorporation of the sludge into soil, and the seventh measure, additional testing for contaminants, all modest adjustments to current practice, seem prudent at this time. They are designed to protect the environment and human health, and we urge you to adopt them now.

Judith Ferster on behalf of the Executive Committee, Orange/Chatham Sierra Club Group.

228 Carolina Meadows Villa  
North Carolina, 27517  
919-929-6648