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Comments from the Ohio Sierra Club on the Draft Report
Great Lakes Health: Getting Better, Getting Worse, and Holding
Chemicals of Emerging Concern Workgroup

Members of the International Joint Commission,

Thank you very much for the Draft Report and for the opportunity to attend the workshop on *Wastewater Treatment and Chemicals of Emerging Concern* at the Biennial Meeting in Detroit. The Ohio Sierra Club appreciates the work and thought that has gone into the Draft Report.

Below are general comments on actions needed to prevent chemical contamination of wastewater, addressing contaminants that enter the water upstream of wastewater treatment plants (WWTPs) and chemicals that remain in the sludge and water after treatment. There are two critical steps in this process:

#1 KEEP HAZARDOUS CHEMICALS OUT OF THE WATER

Regulate Hazardous Chemicals We underscore the Commission's concern about pharmaceuticals and personal care products in wastewater. We urge the IJC to recommend regulation of potentially hazardous, non-biodegradable and persistent chemicals in these products. These chemicals may be hazardous to the consumer in their initial use, as well. Many of these products contain hazardous ingredients that are not necessary for their effect. There are also safer alternatives to many chemicals. The European Union has regulations that would be useful to implement here.

Improve and Enforce Pretreatment We urge the IJC to recommend strict regulations and enforcement to minimize point source discharges of hazardous materials and chemicals of concern into wastewater.

Implement Water Quality Trading Within Watersheds Nutrients and chemicals can be kept out of rivers and streams by paying farmers and landowners to implement best management practices. This is a successful emerging model and research has demonstrated that water quality trading has the potential to produce both environmental and economic benefits, by reducing the cost of nitrogen and phosphorous abatement. We support water quality trading management plans that develop local markets over regional multi-state markets.

Submit Fracking Fluids to Environmental Laws We are astonished and dismayed that the United States government has exempted fracking fluids from its environmental laws. This blatant political favoritism and skirting of American laws undercuts the nation's democratic principles. Over 700 chemicals have been identified in these fluids, many of them hazardous. WWTPs do not have the capacity to deal with these compounds and they should never be permitted to receive them. Fracking fluids pose dangers wherever they exist, whether they are left in the ground below fracking sites, injected into deep wells, or left in pools at the surface. The earth is a dynamic place and inevitably these compounds will defy attempts at isolation. Already we have seen wells, land

and streams more-or-less permanently polluted with natural gas and fracking fluids. Radioactivity is being brought to the surface from uranium and radium which exist naturally in the shale. It is critical for the IJC to voice intense concern and demand a halt to these most egregious practices.

#2 WASTEWATER TREATMENT PLANTS--FUND UPGRADES AND ENFORCE REGULATIONS

Upgrade Digesters The Sierra Club recommends upgrading all WWTPs with anaerobic digesters and best management practices to reduce sewage sludge to the smallest feasible volume. This is a critical first step in reducing bacterial and chemical contamination.

End Sewage Sludge Incineration Sewage sludge is loaded with heavy metals and chemicals of all types. These must not be dispersed into the air and water and onto land. Incineration inevitably *generates* some of the most toxic substances known—dioxins and dibenzofurans. Temperatures optimal for the generation of these compounds always exist in incinerators, regardless of some claims to the contrary. Salt (chloride) necessary for this process is plentiful in sludge.

End Sewage Sludge Land Application We are pleased that the Workgroup looked at this issue. Sewage sludge contains many chemicals of concern, as mentioned above. Using the euphemism “biosolids” does not eliminate the hazards. Some years ago, sewage sludge was listed in the United States as *hazardous waste* and was required to be put in a lined hazardous waste landfill. We recommend that the IJC urge the governments to re-designate sludge as hazardous waste.

Thank you very much for your consideration of these comments.

Respectfully,

Matt Trokan
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Conservation Program Manager