



Cooperatively promoting the environmentally sound recycling of biosolids and other residuals

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November 2, 2021

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Via email: hill-hammond.shaunta@epa.gov

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Dear Dr. Hill-Hammond:

Thank you for the opportunity to comment on the list of candidates for the U.S. Environmental Protection Agency (EPA)'s Science Advisory Board (SAB) Biosolids Panel to review EPA's Standardized Approach to Biosolids Chemical Risk Assessment and a Biosolids Screening Tool to be used for per- and polyfluoroalkyl substances (PFAS) in biosolids.

We write in support of all the candidates who have volunteered their time to serve on the Biosolids Panel. It is quite an impressive list. However, we highly favor the candidates who also serve on the U.S. Department of Agriculture's Multistate Research Committee, known as W4170: Dr. Nick Basta, Dr. Linda Lee, Dr. Ian Pepper and Mr. Greg Kester. They have great experience in risk assessments for pollutants found in biosolids. We also recommend the two candidates from this region which has been at the forefront of PFAS regulatory activity. Dr. Elena Naumova of Tufts University is primarily a data scientist but we believe her skill set and perspective will add value to the Panel.

Finally, Lisa Campe of Woodard & Curran is a professional risk-assessor with 30 years of experience, which is the most relevant knowledge and experience needed for this Panel. Although Ms. Campe is not an expert in biosolids management, she has access to biosolids experts in her firm and through this Association. She covers the other four disciplines you are seeking and would make an outstanding SAB Panelist.

Thank you for considering our comments.

Sincerely,

Janine Burke-Wells, Executive Director

The North East Biosolids and Residuals Association (NEBRA) is a 501(c)(3) non-profit professional association advancing the environmentally sound and publicly supported recycling of biosolids and other organic residuals in New England, New York, and eastern Canada. NEBRA membership includes the environmental professionals and organizations that produce, treat, test, consult on, and manage most of the region's biosolids and other large volume recyclable organic residuals. NEBRA is funded by membership fees, donations, and project grants. Its Board of Directors are from CT, MA, ME, NH, VT, and Nova Scotia. NEBRA's financial statements and other information are open for public inspection during normal business hours. For more information: <http://www.nebiosolids.org>.