

Mr. J. Patrick Nicholson, Chairman and CEO
N-Viro International Corporation
3450 W. Central Avenue, Suite 328
Toledo, Ohio 43606

Dear Mr. Nicholson:

Thank you for your letter of May 18, 2000 concerning the impact of current organic waste disposal practices on greenhouse gas emissions. There have been many developments since you first expressed your concerns in your letter of April 1998.

Enclosed, you will find *Biosolids Generation, Use, and Disposal in the United States*, published in September 1999. This report estimates that, of the 6.9 million tons of biosolids generated in the US in 1998, 1.2 million tons went to landfill or other surface disposal. This compares with over 120 million tons of municipal solid waste going to landfill in 1998. The report also describes how EPA's land disposal criteria apply to biosolids. When we issued these criteria in 1991, EPA was unaware of any direct human health or environmental evidence that problems have arisen from disposal of biosolids in landfills. We would appreciate any information that you may have that identifies and quantifies adverse impacts caused by landfilling of sewage sludge.

The Environmental Protection Agency (EPA) is presently undertaking a complete review of our landfill regulations (40 CFR Part 258). We are conducting this review in part as a result of section 610 of the Regulatory Flexibility Act (5 USC 610). The section 610 review was noticed in the Unified Agenda of the Federal Register on November 22, 1999. We have also requested information on leachate recirculation and bioreactor landfills in the April 6, 2000 issue of the Federal Register. Copies of these notices are enclosed. We welcome any suggestions you may have on how we can improve our landfill regulations.

In addition, EPA will shortly be proposing MACT standards for landfill gas in 40 CFR Part 60 to supplement the NSPS emission standards. These regulations limit the

emissions of methane from many landfills.

The City of San Francisco is initiating a municipal solid waste management system which will collect organic material separately for composting. This follows Halifax, Nova Scotia which is also collecting source separated organic material for composting in order to avoid the possibility of leachate generation in its landfill. EPA is developing a spread sheet model which will allow comparisons of various management options for organic material. We will compare the costs and benefits of composting organics with various forms of landfilling, including bioreactor landfills.

Our Agency shares your interest in capturing the nutrients in animal manures and making those nutrients available in slow release form. Our office is working with EPA's Office of Water in identifying better approaches to managing animal wastes. We are also aware of recent studies in Austria using compost to eliminate methane emissions from landfills. (See enclosed paper, Alternative Approaches to the Elimination of Greenhouse Gases from Old Landfills).

I hope you find this information useful and we look forward to hearing from you. If you have any questions or would like to discuss improved methods of managing organic wastes, please contact Jean Schwab of my staff at 703 308-8669.

Sincerely yours,

Elizabeth A. Cotsworth, Director
Office of Solid Waste

Enclosures

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