
From: Andrew Dobbs <dobbs@texasenvironment.org>
Sent: Wednesday, July 13, 2016 3:32 PM
To: Bob Gregory; Adam Gregory; Ryan Hobbs
Subject: FW: TCE, Clean Water Action concerns regarding wastewater sludge contract

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[Just sent this to the mayor, council, and Water/Wastewater Commission.](#)

-AD

From: Andrew Dobbs
Sent: Wednesday, July 13, 2016 2:44 PM
To: 'steve.adler@austintexas.gov'; 'Houston, Ora'; 'Delia.garza@austintexas.gov'; 'sabino.renteria@austintexas.gov'; 'Casar, Gregorio'; 'ann.kitchen@austintexas.gov'; 'don.zimmerman@austintexas.gov'; 'Pool, Leslie'; 'ellen.troxclair@austintexas.gov'; 'kathie.tovo@austintexas.gov'; 'Gallo, Sheri'; 'Burton, Brandi'; Rodriguez, Genoveva; jackie.goodman@austintexas.gov; 'david.chincanchan@austintexas.gov'; 'shelby.alexander@austintexas.gov'; 'ken.craig@austintexas.gov'; 'joe.petronis@austintexas.gov'; Smith, Amy; 'michael.searle@austintexas.gov'; 'shannon.halley@austintexas.gov'; 'tina.cannon@Austintexas.gov'
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Subject: TCE, Clean Water Action concerns regarding wastewater sludge contract

July 13, 2016

Mayor Adler, Council, and Commissioners:

We are writing today to express Texas Campaign for the Environment and Clean Water Action's deep concerns with the current proposals for disposal of Austin's wastewater sludge. This issue is unique in that it affects not just our members in the City of Austin, but many of our members in other parts of Texas threatened with the environmental impacts of sewage sludge land application.

We are especially concerned that this situation is reminiscent of the deal making that stuck the City with its current biomass energy contract. If the Water Wastewater Commission approves the proposal, the Austin City Council will be asked to make a decision right after its recess and when many Austinites are on vacation; big utility policymaking is being done without thorough stakeholder processes, and environmentally harmful technologies are being proposed in the name of a "sustainability" unsupported by any of Austin's environmental leaders. We've seen this before, and we are urging you not to rush into an expensive, unsound, long-term contract that could end up as a boondoggle.

To avoid this, we suggest the following policy actions:

A holistic and strategic approach to organics material management planning. Curbside organics collection will be processed into compost from food waste, yard waste, and brush generated by Austin Resource Recovery customers. Dillo Dirt compost is made from sewage sludge processed with yard waste and brush. If we make long-term contracts for disposing of any of these elements—yard waste, brush, food waste, or sewage sludge—without knowing exactly how much we'll need for the success of both the curbside composting program and the Dillo Dirt program, we risk putting ourselves in a position where we have to abandon one program—or even both—at great expense to ratepayers and the environment. To our knowledge, no such holistic, strategic planning approach has been undertaken, and if it has it has not included

community members and experts with perspectives distinct from those of city staff. We urge you to delay approval of any proposed contracts until such a process has been undertaken. This should not delay your approval of the expansion of curbside composting citywide, but should help guide staff priorities before and after that authorization. We also encourage Austin Resource Recovery and Austin Water Utility staff to engage the City Council Committee process in this planning.

An independent and critical review of the Dillo Dirt program. In the Synagro contract before the Water and Wastewater Commission tonight, the City is proposing to pay upwards of \$20 million to dispose of a material that it once sold at a profit. What has become of this program, and what opportunities for savings or even making revenue are being missed at this point? The City is now selling unscreened Dillo Dirt—meaning it has not been minimally processed to remove solid contaminants like wood stubble and plastic—for less than 10% of the price it would fetch if screened. Furthermore, the material recovered during screening is actually returned to the active compost pile as a vital input for its continued health; selling unscreened Dillo Dirt undermines the sustainability of the entire program. The fact that Austin Water Utility is proposing to then sell this unfinished compost at a bargain basement price, replacing this revenue-generating program with a new \$20 million cost center indicates that there are major unaddressed challenges in the Dillo Dirt program. We urge you to direct a thorough investigation into the Dillo Dirt program, and to consider a possible public-private partnership to rescue the program if necessary.

A principled rejection of all land application of Austin’s sewage sludge. There is no reason to land apply any of Austin’s sewage sludge—San Antonio was at least at one point composting 100% of its sewage sludge, and they generate considerably more such material than Austin. Land applying this sludge has been tied to major health impacts for neighboring residents, serious quality of life impacts, threats to groundwater, surface water, and even air quality as the pathogens and pollutants in sewage sludge are stirred up. It is wholly irresponsible and contrary to Austin’s values to dump our sewage onto another Texas community that happens to be less wealthy or powerful than we are. Land application is not sustainable, it is not “Zero Waste,” and it is not supported by environmentalists. We ask that as soon as possible you direct city staff to develop policies and programs to ensure that none of Austin’s sewage sludge is land applied or landfilled.

Austin was at one point the nation’s leading innovator on sustainable management of its sewage waste, and there is no reason that we should not maintain that position of leadership. Hasty approval of current proposals, however, may threaten the continued existence of these visionary programs and foreclose other innovative approaches in the future. Such approval could lay enormous costs on ratepayers while burdening rural Texans with dangerous pollution. We urge you to pause the contractual process being urged by staff right now, to direct staff to adopt a holistic approach to all organic discard streams, to begin an investigation into the Dillo Dirt program’s management, and to take a stand against the land application of sewage sludge.

We will be following up in the coming weeks, and we look forward to your action and your replies.

Sincerely,

Andrew Dobbs
Program Director
Texas Campaign for the Environment

David Foster
State Director
Clean Water Action