

125 Airstrip Lane  
PO Box 539  
Ophelia VA 22530  
June 2, 2003

Mr. Mark Alling and Mr. C. C. Bigelow  
Department of Environmental Quality  
PO Box 10009  
Richmond VA 23240

Dear Mr. Alling and Mr. Bigelow:

At the TMDL meeting in Heathsville on May 23, DEQ concluded that humans are the primary cause of the bacterial contamination that imposes restrictions on the harvesting of shellfish in some of our tidal waterways. If "Human loads are required to be reduced at the 100% level.." as you stated, and presented in writing, then it is obvious that all known sources of human pathogens must be eliminated from the watersheds. I raised the issue that the land application of Class B sewage sludge in tidewater counties contributes human pathogens to our waterways via foraging gulls. Attached is my previous correspondence with VDH and DEQ (also available on the web at: [www.napsva.org](http://www.napsva.org).) The previous correspondence, photographs and bibliography outlines my concern. There can be no doubt that importing Class B sewage sludge into the watershed at the rate of trillions of CFU (Colony Forming Units) per truck, is not consistent with your mandate, or with the Code of Virginia. I had previously concluded, apparently incorrectly, that wildlife were the primary sources of bacteria. Your new findings make it more imperative that the land application of sewage sludge be banned in this area in order to protect consumers of shellfish and not place further burdens on our marginal oyster industry, as well as to comply with the clean water act.

Yours sincerely,

Dr. Lynton S. Land  
Email: [JandL@rivnet.net](mailto:JandL@rivnet.net)  
(804) 453-6605 voice and fax

cc: Sec. Murphy, Sec. Woods, Sen. Chichester, Del. Pollard, Rep. Davis, Dr. Stroube - VDH, EPA, Northumberland County BOS, CBF, VA BOH