



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

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April 29, 1991

OFFICE OF
THE ADMINISTRATOR

Honorable William K. Reilly
Administrator
U.S. Environmental Protection Agency
401 M Street, S.W.
Washington, D.C. 20460

Subject: Science Advisory Board's Letter Report
on Review of ORD's Proposed Project Entitled
"Potential Hazards of Municipal Waste
Recycling"

Dear Mr. Reilly:

The Municipal Solid Waste Recycling Subcommittee (MSWRS) of the Environmental Engineering Committee (EEC) of the Science Advisory Board (SAB) met at EPA's Washington, D.C. Headquarters and via teleconference, on December 19, 1990, to confer with the Environmental Criteria and Assessment Office (ECAO) of the Office of Health and Environmental Assessment (OHEA) of the Office of Research and Development (ORD) on recommendations related to the balance of the scope of work for the project entitled "Potential Hazards of Municipal Waste Recycling," and to provide recommendations for a proposed expert panel to be formed by ECAO to guide and critique the above study.

The Subcommittee provided initial responses to the ECAO staff and their support contractor at the meeting, and transmitted written comments directly to the program staff. The major points made and accomplishments of this particular discussion are given below.

With regard to the appropriateness of the Scope of Work, the MSWRS members and consultants suggested the following:

1. To reduce the scope of the project to identify hazards associated with recycling municipal solid waste, and not the more difficult and long-term task of fully assessing risks associated with recycling of municipal solid waste,

2. To identify the target audience of the project in terms of constituency as well as level of knowledge,
3. To recognize and then define the type of recyclables, such as post-consumer versus pre-consumer recyclables for this study,
4. To embrace the notion of a requirement of ultimate (waste) disposal for fractions not amenable to recycling, as well as the realities of activities specifically driven by the market place. Recycling also creates wastes that must be handled,
5. To avoid an a priori declaration of recyclable material types based upon a predisposition toward a particular technology, which could bias the assessment,
6. To focus on post-consumer flows, and to be clear on the intended level of detail of the study, in particular which aspects ranging from consumer separation to municipal recovery facilities will be covered,
7. To consider dispelling myths and clarifying or substantiating anecdotal information associated with recycling, and
8. Data from developing countries which may have have epidemiological studies on scavenging from disposal areas should be sought.

With regard to recommendations of the expert panel, the MSWRS members and consultants suggested the following:

1. Individuals chosen should have direct experience with solid waste management issues, regardless of primary expertise or institutional affiliation,
2. Scientific and/or technical qualifications are the only legitimate factors with which the ECAO/ORD should concern itself. "Balance," for instance is not a relevant criterion for generating a large candidate list,
3. The composition of the expert panel should include engineers from several disciplines, an epidemiologist, an expert on risk assessment/risk management, an expert in community medicine (an appropriately chosen epidemiologist might also fill this role), and

an industrial hygienist (since the hazards of interest are not solely those of respiratory exposure, but include other hazards, such as physical injury. Ideally, the industrial hygienist should have experience or interest in ergonomics), and

4. The views of the solid waste management industry should be sought in order to sensitize the process with the realities of practice.

The SAB's MSWRS suggested twenty-nine (29) possible candidates for the expert panel. We were encouraged to hear that six (6) of the thirteen members chosen (we understand that five accepted) by ECAO for the expert panel came from the SAB's suggestions.

We appreciate the opportunity to assist and provide suggestions on issues such as these. This letter report does not involve complex scientific issues and therefore only a brief acknowledgement by you of its receipt and consideration is anticipated.

Raymond C. Loehr
Raymond C. Loehr, Chairman
Executive Committee
Science Advisory Board

Richard A. Conway
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