



The Mid-Atlantic Biosolids Association (MABA) recommends the state of Maryland work to contain PFAS releases at their source, through use of the industrial pretreatment program, product bans, and other preventive measures, not after their escape into sewers.

Protocols for analysis of PFAS in wastewater and biosolids are still being developed by the US EPA and are not yet ready for regulatory application, and the variability in current sampling, extraction and analytical methods makes the comparison of results from different laboratories unreliable. The Maryland General Assembly should await these protocols and federal guidance before obligating biosolids generators to spend public money.

We recommend that the state of Maryland work to identify sources of PFAS releases to public water sources and to evaluate the risk of releases to publicly owned sewer systems in Maryland, including airfields, landfills, manufactures with historical PFAS use, and industrial laundries, drawing on work of officials in other states.

The state of Maryland should take a leading position in the accreditation of laboratories within the state for PFAS testing of wastewater and biosolids, as the EPA works to gain multi lab validation of its newly proposed 1633 test methods. Likewise, the state of Maryland needs to develop for public review and comment a protocol for use by biosolids generators on how to properly sample wastewater and biosolids to avoid contamination of the samples. We recommend, too, that the state of Maryland be subject to cost-benefit evaluation of all proposed PFAS regulations.