



## Maryland Association of Municipal Wastewater Agencies, Inc.

Washington Suburban Sanitary Commission

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Laurel, MD 20707

Tel: 301-206-7008

### MEMBER AGENCIES

Allegany County  
Anne Arundel County  
City of Baltimore  
Baltimore County  
Town of Berlin  
Cecil County  
Charles County  
City of Cumberland  
D.C. Water  
Frederick County  
City of Hagerstown  
Harford County  
City of Havre de Grace  
Howard County  
Ocean City  
Pocomoke City  
Queen Anne's County  
City of Salisbury  
Somerset County Sanitary District  
St. Mary's Metro. Comm.  
Washington County  
WSSC Water

### CONSULTANT MEMBERS

Black & Veatch  
GHD Inc.  
Hazen & Sawyer  
HDR Engineering, Inc.  
Jacobs  
Ramboll Americas  
WRA

### GENERAL COUNSEL

AquaLaw PLC

February 14, 2025

The Honorable Brian J. Feldman  
Chair, Senate Education, Energy, and the Environment Committee  
2 West Miller Senate Office Building  
Annapolis, MD 21401

### Re: **OPPOSE – SB 732 (Sewage Sludge Utilization Permits – Per-and Polyfluoroalkyl Substances – Concentration Limits)**

Dear Chairman Feldman:

On behalf of the Maryland Association of Municipal Wastewater Agencies (MAMWA), I am writing to share **serious concerns with SB 732**, which would direct the Maryland Department of the Environment (MDE) to issue sewage sludge (biosolids) utilization permits for agricultural land application with a limit of 1 microgram per kilogram for PFOS or PFOA. MAMWA is a statewide association of local governments and wastewater treatment agencies that serve approximately 95% of the State's sewered population. Many members rely on biosolids land application to manage the residuals that remain after treatment at their wastewater plants.

SB 732 would be **damaging for the State's citizens**. The bill would impact nearly every wastewater plant in the State and would **drive up costs significantly for our ratepayers**. If biosolids land application is de facto banned, local wastewater managers will scramble to find alternative options at higher costs.

MAMWA objects to asking our ratepayers to pay more for biosolids management when the private industrial companies that make or use PFAS and profit from PFAS are paying nothing. MAMWA's members take affordability very seriously. We do not want to pass along costs especially when citizens are facing on-going inflationary issues for essentials like food, housing, transportation, and energy costs.

We surveyed our members to ask them how much more their biosolids programs would cost under SB 732. Here are the estimated impacts for just a few of the State's wastewater treatment plants:

- **Utility #1:** Currently land applies in Maryland. Current annual cost is \$120,000. **SB 732 would increase costs to \$211,000 (76% Increase).**
- **Utility #2:** Currently land applies in Maryland. **SB 732 would increase costs by approximately \$12,000,000 annually.**
- **Utility #3:** Current land applies in Maryland. Current annual cost is \$5,700,000. **SB 732 would increase these costs 6 times, to \$33,000,000.**

- **Utility #4:** Currently land applies in Maryland. Current annual cost is \$727,000. **SB 732 would increase costs to approximately \$3,452,000 or an increase of approximately 4.8 times current cost.**
- **Utility #5:** Currently land applies in Maryland. Current annual cost is \$3,100,000. **SB 732 would increase costs to \$4,600,000 annually (48% Increase).**
- **Utility #6:** Current land applies in Maryland. Current annual cost is \$3,000,000. **SB 732 would increase costs to \$3,500,000 annually.**

Another member who did not provide financial impacts shared that landfilling biosolids would increase costs significantly because of their location, limited access to landfills, and the landfill's capacity for their biosolids as more and more plants are pushed to landfill the material.

MAMWA urges the Committee to consider the catastrophic impacts on the State's wastewater plants and their customers and **Vote NO** on SB 732.

Please feel free to contact me with any questions at [Lisa@AquaLaw.com](mailto:Lisa@AquaLaw.com) or 804-716-9021.

Sincerely,



Lisa M. Ochsenhirt  
MAMWA Deputy General Counsel

cc: Education, Energy, and the Environment Members  
SB 732 Sponsor