



Maryland Municipal League
The Association of Maryland's Cities and Towns

TESTIMONY

February 26, 2025

Committee: House – Environment and Transportation

Bill: HB 909 - Sewage Sludge Utilization Permits - Per- and Polyfluoroalkyl Substances - Concentration Limits

Position: Unfavorable

Reason for Position:

On behalf of the Maryland Municipal League (MML), representing 161 local governments across the state, we respectfully submit this testimony expressing our opposition to House Bill 909. While we fully support efforts to reduce exposure to harmful chemicals such as PFOS and PFOA, the proposed restrictions on the land application of biosolids (sewage sludge) in HB 909 impose significant challenges on local governments, particularly those managing wastewater treatment facilities.

The bill's strict limitations on PFOS and PFOA concentrations in biosolids would require municipalities to invest heavily in alternative disposal methods, such as transporting biosolids to landfills. This shift could significantly increase disposal costs, with some municipalities potentially seeing their sewer rates double. These increases would place a substantial financial burden on local governments and ultimately result in higher costs for Maryland residents. The bill's testing and reporting requirements, particularly the need to test biosolids for PFOS and PFOA within a 14-day window, are both impractical and costly. Testing fees for PFOS and PFOA can reach up to \$1,000 per test, with results typically taking more than 14 days to receive. The 14-day testing window, combined with the challenge of arranging timely disposal, presents a logistical and financial burden that is unfeasible for many municipalities, especially smaller or resource-constrained communities.

The language of the bill also imposes requirements that exceed the Maryland Department of the Environment's (MDE) current guidance, which already provides a reasonable framework for regulating PFOS and PFOA concentrations in biosolids. By raising the threshold for PFOS and PFOA concentration to levels as low as 1 µg/kg, this bill places an unfair burden on municipalities to comply with regulations that go far beyond the existing, scientifically-supported guidelines. Many municipalities, such as the City of Cumberland and the City of Frostburg, rely on land application for the disposal of biosolids. The restrictions in this bill would force these municipalities to store biosolids on-site or seek out new disposal sites, which may not have the capacity to handle the increased volume. If alternative disposal methods are not found in a timely manner, wastewater treatment facilities could face serious operational disruptions, including potential shutdowns.

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For these reasons, the Maryland Municipal League respectfully **opposes** HB 909 in its current form. We urge the committee to revise the bill to align with MDE's existing guidance and provide municipalities with more feasible and financially responsible solutions. The Maryland Municipal League (MML) shares the mutual goal of protecting public health and the environment and believes that working together with local governments to address these concerns could help achieve a balanced approach that supports these objectives while minimizing potential burdens on municipalities and residents.

For more information, please contact Tyler Alexis Brice, Manager of Advocacy and Public Affairs, at tylerb@mdmunicipal.org or 254-652-8110.

Thank you for your consideration.

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