

David L. Gadis, Chief Executive Officer

DISTRICT OF COLUMBIA WATER AND SEWER AUTHORITY | 1385 CANAL STREET, SE | WASHINGTON, DC 20003

February 20, 2026

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

RE: SUPPORT WITH AMENDMENTS -- SB 719 (Sewage Sludge – Per- and Polyfluoroalkyl Substances - Regulation)

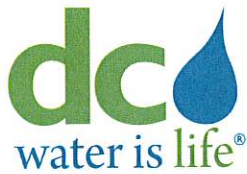
Dear Chair Feldman:

On behalf of DC Water, I am writing to **SUPPORT SB 719 WITH AMENDMENTS**, which would restrict the land application of sewage sludge (biosolids) if PFOS and PFOA in the biosolids reach certain threshold levels. DC Water supports this bill with amendments and respectfully refers the Committee to the amendments submitted by the Maryland Association of Municipal Wastewater Agencies (MAMWA) that would give POTWs the necessary time to conduct source tracking studies and implement mitigation plans, while still allowing for land application under reasonable conditions. If POTWs cannot continue to land apply while this work is underway, they will have no reasonable, cost-effective options for managing this material. Theoretically, biosolids can be landfilled or incinerated, but landfill capacity and incinerator availability is very limited and would be extremely costly as compared to land application. Any increased costs that a POTW incurs would unfortunately be passed on to our customers and your constituents.

DC Water treats approximately 120 million gallons per day of wastewater from Maryland and produces approximately 63,000 tons of biosolids annually attributable to Maryland's portion of the wastewater flows. We are proud of our long-standing partnership with Maryland utilities and to serve Maryland constituents. Our shared infrastructure and environmental responsibilities reflect a regional commitment to protecting public health and the Chesapeake Bay. Water resource recovery facilities play a critical role in protecting the environment, including by keeping carbon and nitrogen out of the Bay. At DC Water, our biosolids are the product of wastewater treatment using world-class technology that eliminates harmful pathogens. Our treatment processes convert a portion of biosolids into gas used to generate renewable energy, and we extract the remaining material to produce biosolids, which contain carbon and nutrients. Carbon is energy, and nutrients are fertilizer—when properly managed, they are valuable resources rather than waste.

DC Water has been proactively working to understand and mitigate PFAS for several years. PFAS testing and monitoring have been underway since 2019, and we are engaged in active research partnerships focused on mitigation strategies. While industrial sources can be significant in some communities, in our service area the greatest mass of PFAS originates from diffuse, non-industrial sources—approximately 95 percent—because there is relatively little heavy industry in the region. Because wastewater treatment plants are receivers—not manufacturers—of PFAS, regulatory approaches focused solely on end-of-pipe controls will not fully address the problem. We believe it is critical that biosolids policy be grounded in sound science, coordinated regionally, and implemented in a manner that avoids unintended environmental consequences, including shifting PFAS to landfills, incineration, or other disposal pathways that may not reduce overall environmental loading.

Therefore, DC Water supports the related SB 686 regulation to ban PFAS in a variety of consumer products. Source control is the most effective long-term strategy for PFAS mitigation—particularly in the everyday products to which consumers are routinely exposed. Preventing PFAS from entering commerce and the waste stream in the first place is the best way to protect public health, agriculture, water resources,



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and wastewater utilities. DC Water will be submitting separate testimony in SUPPORT of SB 686 for this reason.

Finally, we are grateful to Senator Love for her collaborative approach leading up to this legislative session, including several forums and coordination meetings with stakeholders and the Maryland Department of the Environment. That engagement has strengthened the conversation and improved understanding among all parties.

Thank you for your consideration and for your continued leadership on this critical issue. We look forward to working collaboratively with the Committee and all stakeholders as this legislation advances.

Please feel free to contact me with any questions.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Chris Peot', with a long horizontal flourish extending to the right.

Christopher Peot, P.E.
Director, Resource Recovery
DC Water
cpeot@dcwater.com
202-787-4329