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TESTIMONY IN SUPPORT OF SB 719

Sewage Sludge – PFAS Regulation

Education, Energy, and the Environment Committee

February 24, 2026

Dear Chair Feldman and Members of the Committee:

My name is Brent Walls, and I serve as the Program Director and Upper Potomac Riverkeeper for Potomac Riverkeeper Network. Our organization works across Maryland and the greater Potomac watershed to protect clean water, public health, and the communities that depend on them.

I write in strong support of Senate Bill 719, legislation that takes a long-overdue and necessary step to address PFAS contamination in sewage sludge—commonly referred to as biosolids—before it further impacts Maryland's farms, waterways, and drinking water supplies.

At its core, this bill is about closing a dangerous and well-documented pathway of contamination. PFAS are not ordinary pollutants. They are highly persistent chemicals designed to resist breakdown, and as a result, they accumulate over time in soil, water, wildlife, and the human body. Wastewater treatment plants, which receive PFAS from household products, industrial discharges, and other sources, are not equipped to remove these chemicals. Instead, PFAS concentrates in sewage sludge. When that sludge is land applied as fertilizer, it becomes a direct mechanism for introducing PFAS into agricultural soils and the broader environment.

Recent national research further confirms this pathway. A 2026 National Academies report on PFAS in agricultural systems explains that biosolids are now recognized as a significant nonpoint source of PFAS introduction into farmland. Once applied, PFAS do not remain static. Long-chain PFAS tend to bind strongly to soils and bioaccumulate in plants and animals, while short-chain PFAS are more mobile and readily leach into groundwater. PFAS precursors present in biosolids can also transform over time into more stable and bioaccumulative compounds such as PFOA and PFOS.

The report also makes clear that contamination does not stay confined to the application site. PFAS

can migrate off-site through runoff, tile drainage, groundwater movement, atmospheric transport, and even wildlife movement. In agricultural systems, manure from exposed livestock can further recirculate PFAS within the farm, creating a self-perpetuating cycle of contamination.

From there, the pathway is straightforward and deeply concerning. PFAS migrate into groundwater and surface water, are taken up by crops, and accumulate in livestock and dairy products. They move through the food system and into drinking water supplies.

The impacts extend directly to crop production and livestock operations. Research shows that crops grown in biosolids-amended soils may absorb PFAS depending on soil characteristics, crop type, and PFAS chain length. Some crops are more prone to accumulation than others, creating potential market and liability risks for farmers.

Livestock exposure presents an even more serious concern. Animals may ingest PFAS through contaminated forage, water, or bedding derived from biosolids-amended materials. Because PFAS have a strong affinity for proteins, they can bioaccumulate in dairy and meat products. Importantly, studies show that milk and meat may exceed advisory levels even when PFAS concentrations in feed appear relatively low. Economic losses have already occurred in states where farms were forced to halt sales after PFAS was detected in milk or livestock products.

Through our campaign work to “Stop PFAS at the Source”, I have collected samples from private wells near farms that have applied biosolids that show PFAS levels sometimes greater than the EPA PFAS drinking water limit. I have collected stream samples upstream and downstream from runoff streams on farms that use biosolids. The results show clear evidence of PFAS increases in the stream.

The science has evolved rapidly in recent years, and it is now clear that PFAS pose risks at extremely low concentrations. The U.S. Environmental Protection Agency’s recent draft risk assessment on biosolids underscores this reality, finding that even very low levels of PFAS can result in elevated cancer risks through common exposure pathways such as milk consumption or drinking water. Importantly, these assessments often examine a single pathway in isolation, while real-world exposure occurs across multiple pathways simultaneously. That means the true risk is likely higher than what is captured in any single model.

Maryland’s own data reinforces the urgency of this issue. Recent statewide sampling of biosolids has identified PFAS levels that are well within the range of concern identified by federal risk assessments. In other words, this is not a hypothetical problem. It is already present in the materials being applied to farmland today.

This is why it is so important to be clear about what this bill does—and what it does not do. The 25 parts per billion threshold included in SB 719 is not a health-based standard. It is a practical, technology- and cost-informed compromise that reflects current capabilities and the need to begin

reducing risk immediately. The best available science suggests that a truly health-protective level for PFAS in biosolids is likely closer to 1 part per billion or even lower.

But waiting for systems to reach that level before taking action would mean allowing continued contamination in the meantime. SB 719 instead represents a necessary interim step. It establishes a clear ceiling that begins to reduce the highest-risk applications today, while creating the framework—through testing, source tracking, and mitigation planning—to drive PFAS levels down over time.

In that sense, this bill should be understood not as an endpoint, but as the beginning of a transition. By requiring wastewater utilities to identify and reduce upstream sources of PFAS, it sets in motion the very changes needed to move toward truly health-protective levels. Without that mechanism, PFAS levels in biosolids will not decline. With it, we can begin to bend the curve.

Maryland has made meaningful progress in addressing PFAS contamination in other contexts. However, one critical gap remains: there are still no enforceable limits on PFAS in biosolids applied to land. That gap allows contamination to continue in a way that is largely invisible until it is too late.

At the same time, it is important to recognize that preventing PFAS from entering the waste stream in the first place is the most effective and affordable strategy. Once these chemicals are in biosolids and applied to land, they are extremely difficult—if not impossible—to remove.

While biosolids provide organic matter and nutrients that benefit soil fertility, PFAS contamination introduces long-term soil health challenges. PFAS are highly persistent due to their strong carbon–fluorine bonds, and conventional treatment methods such as anaerobic digestion or composting do not eliminate them; in some cases, they may transform precursor compounds into more stable terminal PFAS.

Remediation options remain limited and costly. Emerging approaches such as biochar amendments or modified water treatment residuals may reduce mobility, but they do not remove the chemicals entirely. As a result, contamination can constrain future land use options and complicate conservation planning for years or decades.

Failing to act does not eliminate costs—it shifts them. Without safeguards, the burden falls on farmers who may lose their land or markets, on watermen whose fisheries are impacted, and on communities facing contaminated drinking water. Ultimately, taxpayers bear the cost of cleanup efforts that are far more expensive than prevention.

I am not only an advocate for clean water; my family also runs a small horse farm called the Odd Duck Horse Farm. We raise chickens, turkeys, and hogs to feed our family and sell to other homestead farms. As a farm owner, we source hay from other local farmers. It came to my attention

that one such supplier has used biosolids for many years and transported them across Maryland and into Virginia. He was not aware of PFAS. No one—from the treatment plant to integrators like Synagro, nor state agricultural service agents—mentioned that PFAS is in biosolids or that there is an exposure risk to him and his farm. Several other neighboring farmers shared the same lack of awareness.

SB 719 represents a pragmatic and necessary step forward. It acknowledges both the science and the constraints of current systems. It reduces risk now while creating the conditions needed to achieve stronger protections in the future. And it begins to align responsibility with the sources of contamination, rather than placing the burden solely on those downstream.

This is ultimately a question of whether we begin making progress now or continue to delay while contamination spreads. PFAS will not resolve itself over time. Without intervention, it will only accumulate.

Maryland has long been a leader in protecting water quality and public health. This bill is an opportunity to continue that leadership by taking a meaningful step toward addressing one of the most significant and preventable pathways of PFAS contamination.

For these reasons, I respectfully urge a favorable report on Senate Bill 719.

Thank you for your time and consideration.

Sincerely,

Brent Walls
Program Director & Upper Potomac Riverkeeper
Potomac Riverkeeper Network