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Position: FAV

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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:

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 concentrate 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.

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. What begins as a waste management decision ultimately becomes a public health issue affecting farmers, rural communities, and downstream users alike.

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. The state has taken steps to monitor drinking water, restrict certain uses of PFAS, and better understand how these chemicals move through the environment. 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.

Senate Bill 719 addresses this gap with a thoughtful and balanced approach. It does not seek to eliminate the use of biosolids outright, nor does it ignore the operational realities faced by wastewater utilities. Instead, it creates a tiered system that reduces immediate risks while allowing time for adaptation. The inclusion of mitigation pathways, blending provisions, and transition periods reflects a deliberate effort to ensure that the policy is both effective and implementable.

It is also important to recognize the significant work that has already gone into shaping this legislation. Over the course of the 2025 legislative session and the nine months that followed, there has been an extensive stakeholder engagement process involving wastewater utilities, local governments, state agencies, and environmental organizations. Many of the stakeholders now expressing opposition—including wastewater treatment plants, MACo, MAMWA, MES, and others—were actively engaged in those discussions and, in many cases, initially indicated support for establishing PFAS limits in biosolids.

They raised concerns and proposed changes. Those changes were heard and incorporated. The current bill reflects that collaboration, including added flexibility and phased implementation provisions designed specifically to address those concerns.

It is therefore concerning to see a shift from engagement and constructive input to broad opposition. While continued dialogue is always important, this bill already reflects compromise. The 25 ppb threshold itself is a compromise—one that balances feasibility with the urgent need to reduce risk. If even that level of action is opposed, it raises a fundamental question about whether there is a willingness to move forward at all.

At the same time, it is important to keep in mind 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. Acting upstream is not only better policy; it is better economics.

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.

Potomac Riverkeeper Network has been working on PFAS contamination for years, including sampling efforts, mapping biosolids application sites, engaging with farmers and communities, and advocating for stronger protections. Through this work, we have seen firsthand how little awareness there often is about PFAS risks, particularly among those most directly affected. Farmers are being asked to make decisions about their land and livelihoods without full information about what may be present in the materials applied to their fields. Communities relying on private wells often have no routine testing or warning system in place. These are real and immediate concerns.

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,

Betsy Nicholas, President
Potomac Riverkeeper Network
Betsy@prknetwork.org

Brent Walls PRKN Favorable SB719.pdf
Uploaded by: Brent Walls
Position: FAV

POTOMAC RIVERKEEPER NETWORK

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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

SB0719_IndivisibleHoCo_FAV.pdf
Uploaded by: Caitlin Roe
Position: FAV

SB0719

Sewage Sludge - Per- and Polyfluoroalkyl Substances – Regulation

Testimony before Senate Education, Energy, and the Environment Committee

Hearing February 24, 2026

Position: Favorable

Dear Chair Feldman, Vice Chair Kagan, and members of the committee, my name is Caitlin Roe, and I represent the 1700+ members of Indivisible Howard County. Indivisible Howard County is an active member of the Maryland Legislative Coalition (with 30,000+ members). We are providing written testimony today **in support of SB0719** which would restrict land applications of sewage sludge containing total concentrations of per- and polyfluoroalkyl substances greater than certain levels. We thank Senator Love and Senator Hester for introducing this bill.

Per- and Polyfluoroalkyl Substances, also referred to as PFAS, are types of synthetic chemicals that studies have shown to pose significant dangers to human health. PFAS are also referred to as "forever chemicals" due to their persistence in the environment and their ability to accumulate over time. They have been linked to serious health problems such as cancer, developmental and reproductive issues, immune problems and metabolic issues. According to an article concerning PFAS from NYU Langone Health[1], "The resulting economic burden is estimated to cost Americans a minimum of $5.5 billion and as much as $63 billion annually." In Maryland, sewage sludge containing PFAS is used as fertilizer and spread on farms. This has the potential to contaminate groundwater, fish and wildlife, and milk, fruits and vegetables. With such serious health and economic effects, the spread of PFAS by sewage sludge must be taken seriously.

This bill would work to lower the amount of PFAS in the environment and work to mitigate the highest water treatment systems contributions of PFAS at the source. This bill targets sewage sludge with the highest levels of PFAS, and it gives a reasonable timeline of up to two years to mitigate those at the source. Indivisible Howard County supports this bill and believes it would work to improve the health of Marylanders and reduce the economic burden people in Maryland will likely face as a result of PFAS.

Thank you for your consideration of this important legislation.

We respectfully urge a favorable report.

Caitlin Roe
Hanover, Maryland

1 *Sources Cited*: https://nyulangone.org/news/daily-exposure-forever-chemicals-costs-united-states-billions-health-costs

SB0719_Sewage_Sludge_Per-_and_Polyfluoroalkyl_Subs
Uploaded by: Cecilia Plante
Position: FAV

MARYLAND LEGISLATIVE COALITION

TESTIMONY FOR SB0713
Sewage Sludge - Per- and Polyfluoroalkyl Substances – Regulation

Bill Sponsor: Senator Love
Committee: Education, Energy, and the Environment
Organization Submitting: Maryland Legislative Coalition
Person Submitting: Cecilia Plante, co-chair
Position: FAVORABLE

I am submitting this testimony in favor of SB0713 on behalf of the Maryland Legislative Coalition. The Maryland Legislative Coalition is an association of activists - individuals and grassroots groups in every district in the state. We are unpaid citizen lobbyists, and our Coalition supports well over 30,000 members.

We have so many chemicals in our bodies – bits of plastic and PFAS chemicals. We continue to discover new ways that we are ingesting plastics or harmful chemicals. These chemicals are affecting our health and the health of our children and our environment. We desperately need legislation to reign in these chemicals.

This bill, if enacted, would try to put a cap on the amount of PFAS that is used in sewage sludge, which is used on farms, ingested by animals (which we eat), grown into crops (which we eat) and then runs off into our water supply (which we drink). It prohibits anyone placing sewage sludge on their land from having that sludge have more than 25 parts per billion. It does allow the mixing of sewage sludge with other things to bring down the PFAS to below the 25 parts per billion.

It will, unfortunately require farmers to test for PFAS and come up with mitigation plans if they find higher concentrations of PFAS. The Department of Agriculture can help and should very much be a partner in this. We understand the additional requirements for farmers and are sympathetic to having them use more of their time doing this, but we need to stop PFAS from getting into our food and our water.

We strongly support this bill and recommend a **FAVORABLE** report in committee.

SB0719 PFAS MD-IWLA comment letter.pdf
Uploaded by: Cherie Aker
Position: FAV

Maryland Division
The Izaak Walton League of America
707 Conservation Lane
Gaithersburg, Maryland 20878-2983

DATE: February 24, 2026

TO: Senator Brian J. Feldman, Chair, Education, Energy, and the Environment Committee
Senator Cheryl C. Kagan, Vice-Chair, Education, Energy, and the Environment Committee

RE: Support for SB 719 – Sewage Sludge - Per- and Polyfluoroalkyl Substances - Regulation

Honorable Senators Feldman and Kagan:

On behalf of the Maryland Division-Izaak Walton League (MD-IWLA), I am asking you to support SB 719-- Sewage Sludge - Per- and Polyfluoroalkyl Substances – Regulation. Adopting this bill will set specific maximum concentrations of these substances (broadly known as PFAS) allowed in sewage sludge for land application. Sewage sludge land applied as fertilizer has been shown as a source of PFAS getting into nearby waterways and even into individual drinking water wells.

The bill also sets specific deadlines for compliance, required source tracking studies, and required mitigation plans. This focus on source tracking is critical to significantly reduce the 'forever chemicals' that may pass through wastewater treatment plants into sewage sludge.

Through our National Conservation Policy Handbook, our organization has recognized that these chemicals are contaminating the waters and land across our country and threatening the health of people, communities, and wildlife. The State of Maryland will take a major step forward to reducing these impacts by the requirements in this bill.

Chartered in 1945, the MD-IWLA (www.marylandiwla.org) includes over 4,300 avid anglers, hunters, and outdoor sports enthusiasts who are committed to the wise stewardship of our soil, air, woods, waters, and wildlife. We urge you to support SB 719 to continue Maryland's stewardship of our natural resources and protecting the health of its residents.

Sincerely,

Curt Howard /mcc

Curt Howard, President
Maryland Division-Izaak Walton League of America

WDC 2026 - PFAS Sewage Sludge SB0719.docx.pdf
Uploaded by: Elisabeth Fidler
Position: FAV

MONTGOMERY COUNTY, MARYLAND
WOMEN'S DEMOCRATIC CLUB
P.O. Box 34047, Bethesda, MD 20827 www.womensdemocraticclub.org

Senate Bill SB0719 Sewage sludge - Per- and Polyfluoroalkyl Substance Regulation

Senate Education, Energy, & the Environment Committee - 24 February 2026
SUPPORT

Thank you for this opportunity to submit written testimony concerning an important priority of the **Montgomery County Women's Democratic Club** (WDC) for the 2026 legislative session. WDC is one of Maryland's largest and most active Democratic clubs with hundreds of politically active members, including many elected officials.

WDC urges the passage of SB0719. This bill will reduce the exposure of people in Maryland to per- and polyfluoroalkyl substances (PFAS) in air, soil, water, and food. Expensive technology can remove PFAS from drinking water, but there are few viable options for addressing contamination in agricultural land and the wider environment. PFASs are persistent, bioavailable, and bioaccumulative. They can move through the soil, water, and air to contaminate a larger environment; sources of drinking water, crops, and livestock are great concerns. Until PFAS is eliminated from sewage, it is essential to restrict the use of sewage sludge as a soil amendment.

While no Marylanders should suffer unnecessary exposure to PFAS, limiting exposure to PFAS is particularly important to women and children. Women spend most of their lives in a specially vulnerable group–prenatal, infancy, childhood, adolescence, childbearing, and elderly. Exposures to children can have immediate effects as well as impact their health decades later.

There are many long-term, life-altering, and expensive effects associated with PFAS exposure. Here are a few of the major categories of impacts:

- **Immune Function**. In 2016, the National Toxicology Program, a federal interagency program that evaluates and identifies the health effects of select substances, determined that PFOA and PFOS are hazardous to the immune system. Adult PFAS exposure has been associated with decreases in antibody production. Exposed children respond poorly to vaccines.
- **Cancer.** PFOA is associated with an increased risk for testicular, ovarian, breast, and kidney cancer. Among men with a first-degree relative with prostate cancer, PFOA and PFOS are associated with increased risk for prostate cancer.
- **Child Development.** Human epidemiology studies show associations between PFAS and developmental effects. One study showed that PFAS exposure during pregnancy was associated with decreased birth weight and head circumference in males. A recent study of mothers and their babies showed prenatal exposure to PFOS is associated with cognitive effects and decreased ability to regulate behavior in school-age children.

MONTGOMERY COUNTY, MARYLAND
WOMEN'S DEMOCRATIC CLUB
P.O. Box 34047, Bethesda, MD 20827 www.womensdemocraticclub.org

- **Endocrine Disruption and Fertility**. Our endocrine system controls our basic physiology, including metabolism, growth, fertility, and development. PFAS may interfere with healthy hormonal function in the body. Early-life exposure to PFAS may contribute to the development of metabolic diseases, including obesity and type 2 diabetes. Studies of pregnant women show that those with higher prenatal PFAS levels had children with higher body fat cells at age eight. A special concern is that PFAS alters thyroid hormone function that regulates metabolism and growth. Some PFAS decrease fertility, and affect the ability to nurse. Animal studies support these conclusions.
- **Cardiovascular Disease**. A National Academy of Science Report states that PFAS exposure is associated with an increased risk of dyslipidemia, a condition of high LDL (bad) cholesterol, high triglycerides, or low HDL (good) cholesterol; thus contributing to build up of plaque in the arteries and heart disease.

Human exposure to PFAS is linked to life-altering and life-shortening health impacts. We must limit exposure to PFAS. **We strongly urge your support for SB0719 and a favorable Committee report**.

Cynthia Rubenstein
WDC President

Elisabeth Liisi Fidler
WDC Subcommittee on Environment and Energy

Kate Stein
WDC Advocacy Chair

testimony for SB 686 and SB 719.pdf
Uploaded by: Emily Tarsel
Position: FAV

Emily Tarsell, LCPC

2314 Benson Mill Road
Sparks, Maryland 21152
phone: 410 472 1466

February 24, 2026

Support SB 686
PFAS Chemicals – Product Phase Outs and Registration Requirements

Support SB 719 Sewage Sludge - Per- and Polyfluoroalkyl Substances - Regulation

Senate Education, Energy and Environment Committee

Dear Chairman Feldman, Vice Chair Kagan and EEE Committee Members:

As a mother, professional and decades long resident of Maryland, I advocate for legislation that supports personal and environmental health. This is why I ask for your Favorable vote for both of these non-partisan bills: SB 686 and for the companion bill, SB 719.

Senate Bill 686 is designed to protect Marylanders from PFAS chemicals. PFAS (per- and polyfluoroalkyl substances) are "forever chemicals" that persist in our environment and accumulate in human bodies. They are linked to cancer, immune suppression, thyroid disease, developmental problems, and contaminated drinking water.
The bill requires transparency through product registration and has a graduated ban on PFAS in everyday products with fines for product violations. It sharply restricts PFAS-containing firefighting foam and prohibits disposal by incineration or landfill. It puts the onus for remediation and clean up on the manufacturer, not the public.

SB719 protects our water supply and reduces PFAS at the source of pollution by restricting PFAS content in sewage sludge. It thereby also protects agriculture, the environment and human health. It restricts land application of sewage sludge

and would require transparency through mandatory monitoring of sludge content.

If the bills become law, Marylanders get a cleaner environment, better farming practices, and safer household, personal-care, and children's products. Please give a Favorable report for both SB 686 and SB 719. Thank you.

Sincerely,

Emily Tarsell
chriscares@live.com

SB 719 - CBF - FAV.pdf
Uploaded by: Gussie Maguire
Position: FAV

CHESAPEAKE BAY FOUNDATION

Senate Bill 719
Sewage Sludge – Per– and Polyfluoroalkyl Substances – Regulation

Date: February 24, 2026
To: Senate Education, Energy, & Environment Committee
Position: **FAVORABLE**
From: Gussie Maguire, MD Staff Scientist

The Chesapeake Bay Foundation (CBF) **SUPPORTS Senate Bill 719** which regulates and restricts the use of sewage sludge containing certain concentrations of per- and polyfluoroalkyl substances (PFAS), specifically perfluorooctane sulfonic acid (PFOS) and perfluorooctanoic acid (PFOA), which are already regulated in drinking water.

Per- and polyfluoroalkyl substances (PFAS) are a class of chemicals which break down very slowly in the environment and have toxic and carcinogenic effects on biological organisms. PFAS chemicals accumulate in tissues of soft-bodied organisms like worms and clams in the aquatic and marine environment and are further magnified through the food chain to higher order organisms such as fish and crabs. In at least 20 of Maryland's waterways, the Department of the Environment has issued fish consumption advisories for PFAS.

Wastewater treatment facilities collect PFAS chemicals from a variety of products used by Maryland residents every day, including shampoo, makeup, and cleaning products. Unlike many other contaminants, PFAS cannot be removed from wastewater by conventional treatment processes, meaning that these chemicals remain in liquid effluent and processed solids left at the end of treatment. These solids, otherwise suitable for agricultural purposes after treatment, can result in high concentrations of PFAS at the application site.

The delivery pathway of these chemicals via agricultural practices is of particular concern, as field runoff flows from agricultural ditches and drainage structures to surface waters without filtration. Therefore, testing and regulating application of sewage sludge is a critical step towards keeping PFAS out of Maryland's waterways and food systems. Paired with PFAS product phase-outs required by SB 686, SB 719 will help stop the continued deposition of these forever chemicals in Maryland's soil and water.

Finally, with similar legislation under consideration in Virginia's General Assembly this year, it is even more important that these regulations be instituted in the state to ensure that contaminated sewage sludge from Virginia does not make its way to Maryland's agricultural lands and waterways.

CBF urges the Committee's FAVORABLE report on SB 719.

For more information, please contact Matt Stegman, Maryland Staff Attorney, at mstegman@cbf.org.

MDE SB 719 SUP.pdf
Uploaded by: Jeremy D Baker
Position: FAV

The Maryland Department of the Environment
Secretary Serena McIlwain

Senate Bill 719
Sewage Sludge - Per- and Polyfluoroalkyl Substances - Regulation

Position: Support
Committee: Education, Energy, and the Environment
Date: February 24, 2026
From: Jeremy D. Baker, Director of Government Relations

The Maryland Department of the Environment (MDE) **SUPPORTS** SB 719**.**

Bill Summary
SB 719 establishes restrictions on the land application of sewage sludge containing certain total concentrations of regulated per- and polyfluoroalkyl substances (PFAS). On or after October 1, 2027, sewage sludge or products containing sewage sludge, with total concentrations of two PFAS (PFOA and PFOS) substances equal to or greater than 50 parts per billion, may not be land applied. Sewage sludge with total concentrations of PFAS substances equal to or greater than 25 parts per billion but less than 50 parts per billion may be land applied in accordance with alternate management measures while tracking significant sources of PFAS and implementing an MDE-approved mitigation plan. The biosolids limits established in the bill empower pretreatment authorities, or MDE where it serves as the pretreatment control authority, to establish "local limits" for PFOA/PFOA under the Clean Water Act, and require reductions in regulated PFAS levels from identified significant dischargers into Public Owned Treatment Works (POTWs), and activate cost recovery measures for such dischargers.

Position Rationale
This bill aligns with Maryland's goal of limiting the public health, environmental, and economic risks associated with PFAS while providing for the continued beneficial use of land application as a primary management option for sewage sludge. With rising concern regarding PFAS contamination on agricultural land, the bill ensures that PFAS dischargers to wastewater treatment systems - not ratepayers - shoulder the burden of addressing PFAS contamination, while giving confidence to the agricultural community in the safety of biosolids as a fertilizer. The levels and approaches in the bill were developed after meetings with legislative, industry, agricultural, and NGO stakeholders over the past year and are informed by more than 500 biosolids samples evaluated in 2025. The bill empowers a strong approach to address PFAS in sewage sludge, expanding upon the framework established in MDE's 2024 guidance. While SB 719 incurs a modest fiscal note, the bill will enable the State, wastewater utilities, and farms to avoid much more significant future costs and capacity limitations associated with landfilling sewage sludge and managing contaminated farmland. The Department recommends some technical changes which it understands will be incorporated into sponsor amendments.

Accordingly, MDE asks for a **FAVORABLE** report for SB 719.

Contact: Jeremy D. Baker, Director of Government Relations
Cell: 240-548-3321, Email: jeremy.baker@maryland.gov

26 MGPA_SB719_Biosolids.pdf
Uploaded by: Lindsay Thompson
Position: FAV

Maryland Grain Producers Association
118 Dundee Ave, Chester, MD 21619
Lindsay.mdag@gmail.com (p) 443-262-8491
www.marylandgrain.com

Date: February 24, 2026

SB 719 Sewage Sludge – Per- and Polyfluoroalkyl Substances – Regulation

Committee: Education, Energy and Environment Committee

MGPA Position: SUPPORT

The Maryland Grain Producers Association (MGPA) respectfully submits this testimony in **support** of Senate Bill 719. Maryland's grain farmers are committed to producing safe, affordable food while stewarding our land for future generations. SB 719 advances these goals by promoting science-based limits on PFOA and PFOS in biosolids for application to agricultural land.

Biosolids have long been used as an affordable nutrient source and MGPA supports the continued safe use. Emerging research on per- and polyfluoroalkyl substances (PFAS) underscores the need for careful, data-driven management. SB 719 establishes clear thresholds for PFOA and PFOS concentrations in sewage sludge intended for land application, including prohibiting application above specified levels and requiring monitoring, source tracking, and mitigation planning when concentrations exceed defined action thresholds. These PFAS substances are subject to EPA drinking water standards after thorough scientific review.

The bill's requirement for ongoing sampling, 12-month averaging of PFOA and PFOS measurements, and technical assistance for mitigation planning ensures that regulatory decisions will be grounded in measurable data rather than assumptions. This commitment to data and monitoring is essential for farmers, who rely on predictable and evidence-driven standards when making long-term land management decisions.

Importantly, SB 719 also recognizes the need to identify and control upstream sources of PFOA and PFOS through required source tracking studies and pretreatment measures. By focusing on source reduction rather than solely restricting agricultural land application, the bill supports a comprehensive, science-based solution that addresses contamination at its origin while protecting working farmland from unintended impacts.

Protecting farmland is not only an environmental priority but an economic one. Grain production in Maryland relies on preserving productive acreage and maintaining soil quality for corn, soybeans, wheat, and barley. Contamination concerns can reduce land value, limit crop marketing opportunities, and undermine public confidence in Maryland agriculture. Establishing clear, enforceable PFOA and PFOS standards and mitigation pathways helps safeguard farmland viability and ensures continued consumer trust in crops grown on Maryland soils.

MGPA also appreciates that the bill allows for adaptive management approaches, including blending and mitigation planning under regulated conditions to reduce PFOA and PFOS concentrations below actionable thresholds. This flexibility reflects an understanding that science and treatment technologies are evolving, and it encourages innovation while maintaining protective guardrails for agricultural land and water resources.

In sum, SB 719 promotes a balanced, science-based framework that protects Maryland farmland, supports responsible nutrient management, and addresses PFOA and PFOS concerns through monitoring, source control, and practical mitigation strategies. By grounding policy in measurable data and emphasizing upstream solutions, this legislation helps ensure that farmers can continue to steward their land productively and sustainably for generations to come.

For these reasons, the Maryland Grain Producers Association respectfully urges a **favorable report** on Senate Bill 719.

Support SB 719.pdf
Uploaded by: Mark Meyerovich
Position: FAV

Support SB 719 (HB 925)

PFAS (per- and polyfluoroalkyl substances) are "forever chemicals" that persist in our environment and accumulate in human bodies. They have known and documented health effects (list of references at the end), including:

- Increased risk of infections due to weakened immune function
- Reduced vaccine response in children and adults (e.g., diminished antibodies to tetanus, diphtheria, MMR)
- General immunosuppression (classified as a “presumed immune hazard” by the National Toxicology Program)
- Multiple types of cancer
- Lipid and liver disorders
- Neurodevelopmental and Behavioral Effects
- Decreased fertility in women
- Reduced sperm count and motility in men
    - Hormonal disruption (especially thyroid and sex hormones)
- Increased risk of miscarriage
- Earlier onset of menopause
- Reduced birth weight
- Impaired insulin sensitivity
- Autoimmune and inflammatory diseases
- Cardiovascular and metabolic effects
- Bone density reduction

Regulating the sewage sludge is a critical step in protecting Maryland’s families. The toxic waste dumped onto our land and into the water doesn’t just affect the environment. It has a great impact on agriculture, water, and food supply. PFAS contaminates food and water, and is hard for consumers to avoid or mitigate. Thus we have to look at the source.

Please pass this bill and continue to look for other sources of contamination in our environment, water, and food.

Sincerely,
Mark Meyerovich
District 15

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ShoreRivers_Support_SB719.pdf
Uploaded by: Matt Pluta
Position: FAV

Testimony in Support of Senate Bill 719
Sewage Sludge – Per– and Polyfluoroalkyl Substances – Regulation

February 20, 2026

Thank you for this opportunity to submit testimony in **SUPPORT** of **SB719** on behalf of ShoreRivers. ShoreRivers is a river protection organization on Maryland's Eastern Shore with more than 2,000 members. *Our mission is to protect Maryland's Eastern Shore waterways through science-based advocacy, restoration, education, and engagement.*

This bill protects Maryland's farms, rural communities, and local rivers by:

1. **Establishing enforceable PFAS concentration limits for land-applied sewage sludge,** whereas sewage sludge (biosolids) may not be applied to agricultural or marginal land if total PFOS + PFOA concentrations are **50 parts per billion (ppb) or greater**. Sludge between **25–50 ppb** may only be land applied under strict temporary conditions and mitigation requirements.
2. **Requiring monitoring and standardized testing** by which sewage sludge generators must test for PFOS and PFOA at least quarterly (or more frequently as required), using certified laboratories and approved analytical methods, with results averaged over the preceding 12 months.
3. **Creating mandatory source tracking and mitigation plans** if PFAS concentrations reach or exceed 25 ppb. The generator must conduct a source-tracking study to identify contributors and develop a mitigation plan to reduce PFAS levels below 25 ppb.
4. **Strengthening industrial pretreatment authority** by authorizing The Maryland Department of the Environment and local pretreatment programs to establish local discharge limits and enforce controls on industrial users contributing PFAS to wastewater systems.
5. **Limiting and regulating blending practices.** Blending sludge to dilute PFAS concentrations is temporarily allowed only under strict monitoring, notification, and compliance requirements, and must ultimately achieve concentrations below 25 ppb.
6. **Adding safeguards for land application.** Temporary applications (25–50 ppb) are subject to reduced loading rates, Class B setback requirements, additional well protections, and consultation with nearby jurisdictions and landowners.

ShoreRivers supports this bill because it directly addresses one of the most significant pathways of PFAS contamination on Maryland's Eastern Shore: the land application of sewage sludge. PFOS and PFOA are persistent "forever chemicals" linked to cancer, immune suppression, and developmental harm. Wastewater treatment plants are not designed to remove PFAS, so these chemicals accumulate in biosolids that are then spread on farmland where they can leach into groundwater, contaminate drinking water wells, enter crops, and ultimately reach rivers and the Chesapeake Bay.

ShoreRivers
Scott Budden, Executive Director
Annie Richards, Chester Riverkeeper | Matt Pluta, Choptank Riverkeeper
Ben Ford, Miles Wye Riverkeeper | Zack Kelleher, Sassafras Riverkeeper

shorerivers.org | 443.385.0511 | info@shorerivers.org

There is growing scientific and on-the-ground evidence connecting sludge application to environmental contamination. ShoreRivers' own soil sampling on an Eastern Shore farm field with a history of sludge application detected elevated PFOS and PFOA levels. Maryland has also issued fish consumption advisories for multiple species due to elevated PFAS levels, including species commonly found in Eastern Shore waterways. **Mapping advisory locations alongside sludge application permits reveals concerning overlap, underscoring the urgency of preventing further contamination at the source.**

This bill takes a balanced but firm approach: it sets clear concentration thresholds, requires testing close to the point of land application, mandates source tracking when contamination is elevated, and empowers regulators to reduce PFAS loading from industrial contributors. **By preventing highly contaminated sludge from being spread on farmland and requiring mitigation when PFAS levels rise, the bill protects agricultural soils, drinking water, wildlife, and downstream waterways. T**his aligns squarely with ShoreRivers' mission to protect and restore the Eastern Shore's rivers through science-based advocacy and proactive pollution prevention before contamination becomes irreversible and far more costly to remediate. For these reasons, we urge a **FAVORABLE** report from the committee.

Sincerely,

Matt Pluta, Choptank Riverkeeper on behalf of:

ShoreRivers
Scott Budden, Executive Director
Annie Richards, Chester Riverkeeper | Matt Pluta, Choptank Riverkeeper
Ben Ford, Miles Wye Riverkeeper | Zack Kelleher, Sassafras Riverkeeper

shorerivers.org | 443.385.0511 | info@shorerivers.org

Maryland Catholic Conference_FAVSB719_.pdf
Uploaded by: Michelle Zelaya
Position: FAV

MARYLAND CATHOLIC CONFERENCE

February 24th 2026
SB719
Data Privacy - Consumer Data, Public Records, and Message Switching System (Data Privacy Act)
Economic Matters Committee
Position: Favorable

The Maryland Catholic Conference offers this testimony in support of **Senate Bill 719.** The Maryland Catholic Conference is the public policy representative of the three (arch)dioceses serving Maryland, which together encompass over one million Marylanders. Statewide, their parishes, schools, hospitals and numerous charities combine to form our state's second largest social service provider network, behind only our state government.

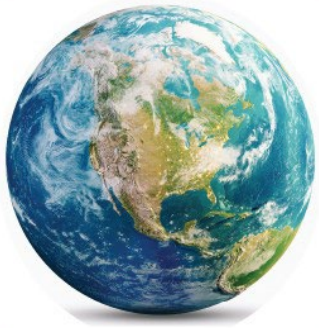
Senate Bill 719 establishes strict limits on the land application of sewage sludge or related products containing PFAS chemicals, setting regulatory boundaries that prevent highly contaminated materials from being spread on agricultural fields or other land across Maryland. It also allows for limited blending of sewage sludge from multiple sources through September 2029, under careful regulation, while implementing monitoring and testing protocols to ensure environmental and public safety.

This policy reduces PFAS contamination in Maryland's soil, waterways, and agricultural systems by limiting the introduction of these persistent chemicals into the environment. PFAS is known as a "forever chemical," and without proper containment it can enter food systems, drinking water, and ecosystems in ways that jeopardize both human health and long-term ecological stability. By setting strong regulatory guidelines, the bill supports public health, protects Maryland farmers, and provides clearer expectations for wastewater treatment facilities and land management practices.

As Pope Francis affirms, environmental degradation disproportionately harms the poor, rural families, and those with limited resources to safeguard their health. This legislation offers broad and meaningful benefits across every level of Maryland society. By reducing exposure to toxic chemicals that can seep into crops, livestock, and water sources, it strengthens the health and safety of entire communities. Families gain the reassurance that the food on their tables and the environment they rely on are cleaner and safer. On a statewide level, the bill helps prevent costly environmental damage and protects Maryland's agricultural economy, which relies on the integrity of our soil, water, and public confidence in the safety of locally grown food. Altogether, these measures create a healthier, more resilient future for Maryland and safeguard the well-being of generations to come.

For these reasons, the Maryland Catholic Conference urges a favorable report on **Senate Bill 719.**

SB 719_Maryland Catholics for Our Common Home_FAV.
Uploaded by: Robert Simon
Position: FAV



Maryland Catholics for Our Common Home

Responding to the cry of the Earth and the cry of the poor.

Hearing before the Senate Education, Energy, and the Environment Committee
Maryland General Assembly
February 24, 2026

Statement of Support (FAVORABLE)
of Maryland Catholics for Our Common Home on
SB 719, Sewage Sludge – Per- and Polyfluoroalkyl Substances – Regulation

Maryland Catholics for Our Common Home (MCCH) is a lay-led organization of Catholics from parishes in the three Catholic dioceses in Maryland: the Archdiocese of Baltimore, the Archdiocese of Washington, and the Diocese of Wilmington. It engages in education about, and advocacy based upon, the teachings of the Catholic Church relating to care for creation and respect for all life. MCCH is a grassroots voice for the understanding of Catholic social teaching held by a wide array of Maryland Catholics. In the 2025 Legislative Session, over 700 Maryland Catholics from 45 different Catholic parishes and religious communities across the State joined together through MCCH to support several key environmental bills under consideration by the General Assembly. MCCH is independent, though, and should be distinguished as an organization from the Maryland Catholic Conference, which represents the public policy positions of the bishops who lead these three dioceses.

Because we are attuned both to the cry of a distressed Earth and the cry of the poor who suffer first and foremost from the environmental damage caused by human activities, **MCCH would like to express its strong support for the passage of Senate Bill 719, Sewage Sludge – Per- and Polyfluoroalkyl Substances – Regulation.**

As Catholics, we are guided by the teachings of Pope Leo XIV, Pope Francis, and their predecessors, which have given priority to (1) care for Earth's environment and (2) concern for the way in which pollution and climate change especially affect those who are poor. Pope Leo XIV, in an address last year, stated that "Everyone in society, through non-governmental organizations and advocacy groups, must put pressure on governments to develop and implement more rigorous regulations, procedures and controls" in order "to mitigate the damage done to the environment."[1]

In his 2015 encyclical, entitled *Laudato Si': On Care for Our Common Home*,[2] Pope Francis outlined the Catholic Church's concerns regarding "pollution that affects everyone, caused by transport, industrial fumes, substances which contribute to the acidification of soil and water, fertilizers, insecticides, fungicides, herbicides and agrotoxins in general." (no. 20) He highlighted threats to drinking water, because "access to safe drinkable water is a basic and universal human right, since it is essential to human survival and, as such, is a condition for the exercise of other human rights." (no. 30)

In recent years, public health professionals have become more acutely aware of the threats to human health from groundwater supplies and drinking water contaminated by PFAS (per- and polyfluoroalkyl substances).

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[1] "Address of The Holy Father Leo XIV to the Participants in the 'Raising Hope' Conference on the Tenth Anniversary of the Encyclical Laudato Si'," 1 October 2025, available at https://www.vatican.va/content/leo-xiv/en/speeches/2025/october/documents/20251001-conferenza-mariapoli.html.

[2] The English text of the encyclical, to which the paragraph numbers in the parentheses refer, can be found at: https://www.vatican.va/content/francesco/en/encyclicals/documents/papa-francesco_20150524_enciclica-laudato-si.html.

Commonly known as “forever chemicals”—because PFAS do not break down in nature—these chemicals migrate throughout the natural systems around us, presenting dangers to humans from direct exposure through drinking water; through consumption of milk and certain fruits and vegetables containing PFAS; and through bioaccumulation in fish and wildlife.

One important source of PFAS contamination in the environment is from the application of sewage sludge containing PFAS to farmland. Rural residents and communities that rely on groundwater for their drinking water supplies can be particularly affected by this contamination.

Senate Bill 719 takes important first steps towards addressing the danger to public health and the environment from PFAS in sewage sludge (1) by clarifying and enhancing the authority of the Maryland Department of the Environment and local jurisdictions to set pretreatment standards for PFAS in wastewater treatment plants, (2) by permitting local jurisdictions to set rates and fees for industrial users discharging PFAS, (3) by requiring wastewater treatment plants conduct a study to identify the source of PFAS entering their plants, if their sewage sludge has over 25 parts per billion of PFAS contamination, and (4) by establishing a three-tier system of protection for Maryland farms from PFAS-contaminated sewage sludge, based on PFAS concentrations. The bill also offers some operational and transitional flexibility for wastewater treatment plants as the bill’s provisions take effect.

These steps are important and positive steps that will help Maryland safeguard its drinking water sources, environment, and the health of its farmers and communities.

For these reasons we strongly urge your support for this bill. Thank you for your consideration of our views and our respectful request for a **favorable** report on Senate Bill 719.

FAV_SB0719 Sewage Sludge & PFAS Limits.pdf
Uploaded by: Robin Broder
Position: FAV

SB0719 - Sewage Sludge - Per- and Polyfluoroalkyl Substances - Regulation
Hearing date: Tuesday, February 24, 2026

Position: FAVORABLE

Dear Chair Feldman and members of the Education, Energy, and the Environment Committee:

Waterkeepers Chesapeake and the below signed organizations respectfully request a FAVORABLE report on SB 719 which establishes a long-overdue limit on toxic PFAS found in sewage sludge (known as biosolids) that is used as fertilizer and spread on Maryland's farm fields, as well as identify and mitigate upstream sources of PFAS pollution before it reaches wastewater treatment plants.

The Problem

Sewage sludge is the solid waste produced during the treatment of municipal, human, and industrial wastewater. In Maryland, sewage sludge — including some from out-of-state facilities — is used as fertilizer on farms. However, sewage sludge often contains pathogens and toxic substances, including PFAS chemicals, also known as "forever chemicals." While existing Maryland regulations prohibit immediate grazing, row crop consumption, and public access to treated fields, these measures fall short when sewage sludge contains PFOS and PFOA, two highly toxic PFAS compounds that persist in the environment and pose significant risks to human and ecological health.

During treatment, these chemicals concentrate in sewage sludge, which is often spread on agricultural fields. Maryland's sewage sludge permits allow waste from multiple facilities to be applied to single fields, heightening the risk of contamination.

Sewage sludge containing PFAS runs off farm fields into rivers and streams and filters into groundwater, contaminating the drinking water sources for farmers and their neighbors. PFAS also bioaccumulates in fish[1] and wildlife, and is stored in milk, as well as certain fruits and vegetables.

States across the country are working to pass policies that protect human and environmental health from toxic PFAS in sewage sludge. Following their lead, Maryland began testing sewage sludge and found significant PFAS levels. While the state has recommended guidance on PFOS and PFOA levels in sewage sludge, they lack necessary regulatory authority.

Since 2003, EPA has known that sewage sludge can contain alarming levels of PFAS. In a 2018 report, the Environmental Protection Agency's (EPA) Inspector General accused the agency of failing to properly regulate biosolids.[2] However, it wasn't until January 2025 that the EPA's draft Sewage Sludge Risk Assessment was released[3]. It highlights the severe risks posed by PFOS and PFOA levels as low as 1–5 parts per billion, linking exposure to contaminated water, wildlife, and crops to serious health issues, including immune dysfunction, thyroid disease, and cancer.

What the Bill Does

- **Tiered Protections for Maryland Farms**
    - **> 50 ppb (combined PFOA + PFOS):** no land application permitted
    - **25-49 ppb:** Utilities must develop a Mitigation Plan and temporary management requirements (e.g. setbacks, buffers, reduced application rates) may also apply
    - **< 25 ppb: no restrictions**
- **Stopping Pollution at the Source**
    - **Source tracking**: If sewage sludge tests over 25 ppb, wastewater treatment plants (WWTPs) must conduct a study to identify the source, enabling PFAS to be stopped at the source.
    - **Industrial Pretreatment Standards**: MDE's and local jurisdictions' authority to set pretreatment standards is clarified and enhanced.

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[1] Land Use Associations and Sources of PFAS in Smallmouth Bass in Chesapeake Bay Watershed, Vicki Blazer, USGS, presentation at Maryland Pesticide Education Network conference, December 2024 https://mdpestnet.org/wp-content/uploads/2025/01/Blazer_Assoc.-PFAS-in-Smallmouth-Bass.pdf

[2] The EPA Promotes Toxic Fertilizer. 3M Told It of Risks Years Ago, New York Times, Hiroko Tabuchi, December 27, 2024

[3] EPA's Draft Sewage Sludge Risk Assessment for Perfluorooctanoic Acid (PFOA) and Perfluorooctane Sulfonic Acid (PFOS), January 2025 https://www.epa.gov/biosolids/draft-sewage-sludge-risk-assessment-perfluorooctanoic-acid-pfoa-and-perfluorooctane

    - **Polluter Pays**: Local jurisdictions can set rates and fees for industrial users discharging PFAS.
- **Operational Flexibility for WWTPs:**
    - **Blending Authority:** WWTPs are allowed to blend sludge from multiple sources to dilute PFAS to below 25 ppb until Sept. 29, 2029.
    - **Transitional Application**: Facilities with levels of 25-49 ppb can land apply for up to 12 months at a reduced rate and with setbacks while developing mitigation plans.

Farmers and watermen are sounding the alarm[4] and filing lawsuits[5]. We should act now. Maryland can't wait for the EPA and must take stronger action to safeguard its drinking water sources, environment and the health of our farmers and communities. While there is no known safe level, this bill takes a significant step to lower health risks, and identify and mitigate sources of PFAS before getting to wastewater treatment plants. Waterkeepers Chesapeake and the below signed organizations urge this committee to issue a FAVORABLE report on SB 719.

Respectfully,
Robin Broder, Acting Executive Director
Waterkeepers Chesapeake
robin@waterkeeperschesapeake.org

Betsy Nicholas, President
Brent Walls, Upper Potomac Riverkeeper
Dean Naujoks, Potomac Riverkeeper
Potomac Riverkeeper Network

Matt Pluta, Choptank Riverkeeper & Director of Riverkeeper Programs
ShoreRivers

Elle Bassett, West, Rhode & South Riverkeeper
Arundel Rivers Federation

Alice Volpitta, Baltimore Harbor Waterkeeper
Blue Water Baltimore

Taylor Swanson, Executive Director & Assateague Coastkeeper
Asstateague Coastal Trust

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[4] Beware of Biosolids: Lack of Testing for Forever Chemicals Heightens Risk [Opinion], Tom Venesky, Lancaster Farming, February 7, 2025
[5] EPA Sued to Remove PFAS from Biosolid Fertilizers, PEER, June 6, 2024, https://peer.org/epa-sued-to-remove-pfas-from-biosolid-fertilizers/

Theaux LeGardeur, Executive Director & Riverkeeper
Gunpowder Riverkeeper

Ted Evgenaidis, Executive Director & Lower Susquehanna Riverkeeper
Lower Susquehanna Riverkeeper Association

Sara Clades, Severn Riverkeeper
Severn River Association

Trey Sherard, Anacostia Riverkeeper
Anacostia Riverkeeper

Evan Isaacson, Senior Attorney, Director of Research
Chesapeake Legal Alliance

Randy Lyon, Legislative Chair
Sierra Club Maryland Chapter

Matt Stegman, Maryland Staff Attorney
Chesapeake Bay Foundation

Jim Brown, Policy Director
Audubon Mid-Atlantic

Dave Arndt, Co-Chair
Maryland Legislative Coalition - Climate Justice Wing

Ruth Berlin, Executive Director
Maryland Pesticide Education Network

Tom Taylor, Co-Chair
Beaverdam Creek Watershed Watch Group

Robert M. Simon, Coordinator
Maryland Catholics for Our Common Home

Linda Kohn, President
League of Women Voters of Maryland

Emily Ranson, Chesapeake Regional Director
Clean Water Action

Peter Alexander, Co-Facilitator
Indivisible HoCoMD

Liisi Fidler
Chair, Subcommittee on Environment and Energy
Women's Democratic Club of Montgomery County

Mary Gant, Director of Government Affairs
Kids for Saving Earth

Emily Scarr, Senior Advisor
Maryland PIRG

Patricia Monroe, Chair
South County Environmental Justice Coalition

Marisa Olszewski, Environmental Policy Manager
Maryland League of Voters

SB 719 - Biosolids on Ag Land - wttn .pdf
Uploaded by: Sara Love
Position: FAV

Sara N. Love
Legislative District 16
Montgomery County

Judicial Proceedings Committee

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THE SENATE OF MARYLAND
ANNAPOLIS, MARYLAND 21401

Chair Feldman, Vice Chair Kagan, and Members of the EEE Committee:

This Committee is well-aware of the dangers of PFAS (Per- and Poly-Fluoroalkyl Substances), toxic chemicals that cause increased risks of cancer, infant mortality, reproductive harms, depressed immune systems, and developmental effects in children, among other health problems. To date, this body has taken a measured and methodical approach in addressing PFAS: turn off the spigot, address areas that pose the highest exposure for humans, and hold the users of PFAS responsible.

SB 719 addresses an area that poses high exposure for humans: biosolids that are applied on agricultural land. Biosolids are the byproduct of wastewater treatment and are sometimes used as fertilizer. But PFAS—particularly PFOA and PFOS, the two most studied and well-documented toxic compounds—persist through the treatment process and concentrate in those biosolids. They build up over time on farmland, and according to the latest assessment from EPA they can pose significant risks to farmers, people who regularly consume food from their farms, and the environment.

SB 719 sets up a tiered approach regulating how much PFOA and PFOS can be in biosolids that are applied on agricultural land. It also gives wastewater treatment plants pre-treatment authority to look upstream and stop users of PFOA and PFOS from discharging them into the wastestream.

Context
Other states have learned the hard way the toxic and dangerous nature of PFAS on farmland. In Maine, farmer Bill Stone spread biosolids on his fields—consistent with Maine law—and lost his farm after PFAS contamination poisoned his soil, livestock, and family. Maine has now banned land application of biosolids and all Maine wastewater treatment systems must landfill or truck their biosolids out of state. Connecticut has done the same. In Texas and New Mexico, farmers have suffered devastating losses tied to PFAS contamination, with ongoing litigation and public health fallout. The New York Farm Bureau has publicly opposed land application unless testing confirms biosolids are free of PFAS.

SB 719 is the product of a year of work. During the session last year we worked on - and almost came to an agreement on - SB 732 (2025). Multiple stakeholder workgroups continued that work over the interim. Wastewater utilities, local government representatives, agricultural representatives, environmental advocates, and regulators were at the table. From that work we crafted SB 719, a measured, data-driven proposal.

Last year, utilities expressed concern that we lacked sufficient data. Today, we have it. Maryland has more than 250 wastewater systems. Only about 50 are currently permitted to land apply biosolids, and we have more than 500 samples from them measuring PFOA and PFOS. Of those:

- None that are currently land applying exceed the 50 parts per billion upper threshold in this bill.
- Only two—WSSC and Havre de Grace—fall between 25 and 50 parts per billion. And WSSC does not currently land apply in Maryland.
- Baltimore City is hovering right around the 25 ppb threshold, though it does anticipate those levels could rise. Notably it does not currently land apply in Maryland, though it may wish to in the future.
- DC Water is below 20 ppb and would not be affected by this bill
- Anne Arundel County is well below 25 ppb and would not be affected by this bill

What SB 719 Does
First, SB 719 prohibits land application of biosolids exceeding 50 ppb for PFOA and PFOS.

Second, for biosolids with a concentration of PFOA and PFOS between 25 and 50 ppb, it requires a mitigation framework developed with MDE—setbacks, timing restrictions, blending, and other risk-reduction strategies to limit exposure while upstream sources are addressed.

Third, SB 719 strengthens pretreatment authority, giving wastewater systems the authority to stop people from discharging PFAS down the drain. Utilities already have pretreatment authority for pathogens and other contaminants. This bill clarifies and strengthens their ability to identify high-concentration PFAS dischargers and require action—whether through onsite pretreatment, product substitution, or other mitigation. The best, durable, most equitable and cost-effective solution is to control the source of the PFAS in the first place. The authority includes the ability to assess fees or penalties on dischargers who fail to comply. That is how we protect ratepayers.

Why we need to act now
This bill is about protecting the health of Marylanders, the agricultural community, and our environment. We should not be ingesting food that has been contaminated by PFAS. Farmers should not bear the risk of losing their land, their markets, or their livelihoods because PFAS flowed through a wastewater system.

Further, land application of biosolids is a business, and currently there is a market for biosolids. But PFAS are shaking the foundations of that market. Currently Maryland exports the majority of its biosolids to be spread on farms in Virginia and Pennsylvania. Right now, there are three bills in the Virginia legislature that propose to ban the import of biosolids – including from Maryland.

If we wait until a Maryland farm is contaminated, people will be sick and farmers will lose their livelihoods. Public confidence in biosolids will collapse overnight. We will not be debating 25 or 50 parts per billion. We will be debating outright bans, emergency measures, and multimillion-dollar remediation costs.

We can either manage this transition thoughtfully today or be forced into crisis management tomorrow. SB 719 strikes the balance. It protects public health. It safeguards farmers. It preserves a viable biosolids program. And it places responsibility where it belongs—on those introducing PFAS into the system, not on ratepayers or agricultural communities downstream.

I respectfully request a favorable report on Senate Bill 719. Thank you.

CLA Favorable SB719.pdf
Uploaded by: Steve Forrer
Position: FAV

CHESAPEAKE
LEGAL ALLIANCE

1212 West Street
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www.ChesapeakeLegal.org

Support for Senate Bill 719

Dear Chairman Feldman and Members of the Committee:

The Chesapeake Legal Alliance supports Senate Bill 719, an important next step in our ongoing efforts to reduce PFAS levels in Maryland. SB 719 is designed to increase safeguards for Maryland's agricultural land and drinking water from "forever chemicals"—specifically PFOA and PFOS. The bill offers a balanced and modest approach to improving public health while providing our wastewater treatment plants with maximum flexibility to adapt as we continue to move marginally closer to a future free of these chemicals. The legislation moves the ball incrementally forward on PFAS regulation in several ways.

First, the bill better protects rural communities and our food supply. The application of sewage sludge containing PFAS poses a risk to our food system and drinking water wells in rural areas. SB 719 establishes clear, albeit not particularly stringent, guardrails by fully prohibiting the application of sewage sludge with a concentration of regulated PFAS equal to or greater than 50 parts per billion (ppb) on agricultural or marginal land. By setting this threshold, the bill ensures that egregious levels of contaminants are not unknowingly spread onto the land where they can harm our agricultural products and rural groundwater and streams.

Second, the bill promotes fiscal responsibility and "polluter pays" accountability. Currently, the burden of contamination falls on farm families, their neighbors, and consumers in the form of health costs, and on municipal treatment plants to pay for the proper alternatives to land application. This bill helps shift this burden to where it belongs: the sources of PFAS. The bill explicitly authorizes local jurisdictions and pretreatment authorities to set rates and fees for industrial users that discharge PFAS into the wastewater system. This protects municipal budgets and taxpayers by ensuring that the relatively small number of sources causing a disproportionate amount of the problem help pay for the necessary mitigation. This is a model that has shown great success in Michigan and will have important co-benefits by helping catalyze greater controls of industrial pollution into our sewer systems.

Third, the bill provides operational flexibility and a reasonable transition period. This bill is neither an immediate nor a blanket prohibition; it is a structured transition. Recognizing that process changes take time, SB 719 offers wastewater utilities - the generators of sewage sludge - significant operational flexibility, including: (1) a delayed effective date of October 1, 2027 for the substance of the bill; (2) an additional two-year transitional period until September 30, 2029 during which facilities are authorized to blend sludge from multiple sources to dilute PFAS concentrations to levels lower than the 25 ppb threshold; (3) a 12-month period during

which facilities required to develop a mitigation plan due to sludge concentrations over 25 ppb (but less than 50 ppb) may continue to land apply biosolids, albeit with additional protections in the form of a reduced application rate and additional setbacks from neighboring wells; and (4) a two-year timeframe for implementing a mitigation plan, along with a potential six month extension.

Finally, the bill focuses on solving the problem at the source. SB 719 is designed to fix the problem by keeping PFAS out of our sewer systems altogether, protecting not just rural wells where biosolids are applied, but also our waterways, since PFAS is not capable of being filtered even by Maryland's advanced wastewater treatment plants. If sludge tests at or above 25 ppb, a level broadly indicative of industrially impacted biosolids, the generator is required to conduct a source tracking study to identify exactly where PFOA and PFOS are entering the system. Following this study, the generator must submit a mitigation plan within 6 months that starts a timeline - not to exceed 2 years - to reduce levels through pretreatment controls or system upgrades.

Senate Bill 719 is not the bill that public health and environmental advocates would prefer, but it does reflect a series of compromises with municipal stakeholders that we believe move the ball forward in a positive direction. We would certainly welcome the opportunity to strengthen the bill further through amendments or to support future legislation that builds upon the framework established in this bill.

For these reasons we support Senate Bill 719. For more information, you may reach Evan Isaacson at evan@chesapeakelegal.org and Steve Forrer at steve@chesapeakelegal.org.

1212 West Street, Annapolis, MD 21401 • 410.216.9441 • Fax 410.216.7077 • www.chesapeakelegal.org

ACT Testimony - SB0719.pdf
Uploaded by: Taylor Swanson
Position: FAV

Testimony in SUPPORT of SB719
Sewage Sludge - Per- and Polyfluoroalkyl Substances - Regulation

Education, Energy, and the Environment Committee
February 20, 2026

Dear Chair Feldman and Members of the Committee,

Thank you for the opportunity to submit testimony in **SUPPORT OF SB 719** on behalf of Assateague Coastal Trust.

Assateague Coastal Trust is dedicated to its mission of conservation, preservation, and protection of the waterways of the Lower Eastern Shore and the Coastal Bays of Delmarva. Our work helps ensure that residents and visitors to Maryland's coast forever enjoy the resources of our coastal waters.

This bill helps to address a growing threat to Maryland's waterways, farms, and the health of citizens across the state. While Worcester County does not currently have land application of biosolids, we strongly support this bill and its benefits for the Eastern Shore of Maryland.

PFAS often called "forever chemicals" can persist in soil and water for decades, bioaccumulate in crops, and ultimately reach consumers. Once contamination occurs, remediation is extraordinarily expensive and sometimes impossible. SB 719 takes an important step towards establishing clear concentration limits for PFAS in sewage sludge.

In Maine, widespread PFAS contamination linked to biosolid application has devastated family farms, contaminating milk supplies and has forced state intervention. In many cases, these farmers have been forced to abandon their farms.

In Texas, similar concerns have emerged where land-applied biosolids have been connected to elevated PFAS levels affecting ranchers and rural communities. The application of these biosolids is even connected to the fatalities of livestock.

These cases illustrate the financial, environmental, and emotional toll of delayed action.

By setting clear standards now, we can avoid farm losses seen in other states, and give agricultural producers certainty. It ensures that farmers are not unknowingly applying materials that could impair their soil. Assateague Coastal Trust fears a future in which farmers on the Eastern Shore might lose their ability to farm their own land because of preventable contamination.

Additionally, and concerningly for waterways across the State, PFAS contaminated soils can lead to contamination entering waterbodies and groundwater. This poses a serious risk for further contamination of aquatic life, and bioaccumulation in important resource species, like striped bass, oysters, and crabs.

Even in counties where biosolids are not currently applied, we recognize that prevention is far less costly than remediation. SB 719 takes a responsible, science-driven step to support farmers, protect consumers, and preserve the environmental heritage of the Lower Eastern Shore.

Assateague Coastal Trust urges an **FAVORABLE REPORT** on **SB 719**.

Sincerely,

Taylor Swanson,
Executive Director and Assateague COASTKEEPER
Assateague Coastal Trust

MDFB - Support - SB719 - Sewage Sludge - Per- and

Uploaded by: Tyler Hough

Position: FAV

Maryland Farm Bureau
3358 Davidsonville Road | Davidsonville, MD 21035
410-922-3426 | www.mdfarmbureau.com

February 24, 2026

To: Senate Education, Energy and the Environment Committee

From: Maryland Farm Bureau, Inc.

RE: **Support of SB719 - Sewage Sludge - Per- and Polyfluoroalkyl Substances – Regulation**

On behalf of the more than 7,000 member families of the Maryland Farm Bureau, I respectfully submit written testimony in support of SB719 – Sewage Sludge – Per- and Polyfluoroalkyl Substances – Regulation. This legislation establishes reasonable restrictions on the land application of sewage sludge, or products containing sewage sludge, when total concentrations of certain regulated per- and polyfluoroalkyl substances (PFAS) meet or exceed specified thresholds.

Maryland farmers have long relied on biosolids and other soil amendments as essential tools to maintain soil health, support crop productivity, and promote sustainable agricultural practices. At the same time, farmers are increasingly aware of and concerned about the risks associated with PFAS contamination, and the potential long-term impacts these chemicals may have on farmland, water quality, and public trust.

SB719 strikes an appropriate balance by preserving access to a valuable, cost-effective soil amendment while putting in place safeguards to prevent harmful levels of PFAS from entering agricultural systems. This approach both protects farmers, who are often the end users of these products, and maintains the viability of a practice that supports soil fertility and environmental stewardship.

For these reasons, the Maryland Farm Bureau urges a favorable report on SB719.

Tyler Hough
Director of Government Relations
Maryland Farm Bureau

Please contact Tyler Hough, though@marylandfb.org, with any questions

SB 719
Uploaded by: Zachary Schafer
Position: FAV

KEY: 50PPB OR ABOVE | 25-50PPB | BELOW BUT NEAR 25PPB | BELOW 20PPB

	Facility Name	Analyte	2023 data	January		February		March		April		May		June		July			August		September			October		November		December		12-month Running Average	
				Sample 1	Sample 2 (if app)	Sample 1	Sample 2 (if app)	Sample 1	Sample 2 (if app)	Sample 1	Sample 2 (if app)	Sample 1	Sample 2 (if app)	Sample 1	Sample 2 (if app)	Sample 1	Sample 2 (if app)	Sample 3	Sample 1	Sample 2 (if app)	Sample 1	Sample 2 (if app)	Sample 3	Sample 1	Sample 2 (if app)	Sample 1	Sample 2 (if app)	Sample 1	Sample 2 (if app)	Each Analyte	PFOA+PFOS Combined
1	Aberdeen (City) Advanced WWTP/Compost Facility	PFOS				10.2				7.5						8.2										8				8.5	17.3
		PFOA				9.7				8.3						9.3										8.1				8.9	
2	Annapolis WWTP	PFOS	7.4	3.5				4.5				3.2							4.5		0					4.3				3.3	3.7
		PFOA	2.4	0.25				0				0.56							0		1.3					0				0.4	
3	Back River WWTP	PFOS	30.2	21.6		31.8		21.4		NO Sample was collected	NO Sample was collected	30.8		18.4			1.9			22.3		27.7				24.8		22.9		22.4	24.6
		PFOA	1.8	2.2		2.1		2.2				2.1		2			2			2.1		2.2				2.2		2.3		2.1	
4	Ballenger Creek WWTP	PFOS	11.5			7.2		8.2		5.5		6		<4.7		7.4			7.1		6.9			7.7		8.5		4.7 J		7.2	9.7
		PFOA	3			3.9		2.1		1.6		<4.8		<4.7		<5.8			2.7J		<5.6			<5.4		<6.4		2 J		2.5	
5	Baltimore City S.S. Composting Facility (Veolia)(Back River WWTP)	PFOS		12.5						11						NO lonGer Receiving Sludge														11.8	15.4
		PFOA		2.6						4.7																				3.7	
6	Blue Plains WWTP	PFOS	16	21	23	17	14	14	18	12	12	13	12	11		14			17		14			13		16		16		14.2	16.1
		PFOA	4	3.6	3.1	3	2.4	1.8	2.1	1.9	2.7	1.5	1.5	1.4		2.1			2.1		2.1			1.8		2.2		0		1.9	
7	Broadneck WWTP	PFOS	11.5			7.2		5.6				6.3							9.4		11					8.9				8.1	9.6
		PFOA	4.8			2		1.3				1.5							0		1.9					2.4				1.5	
8	Broadwater WWTP	PFOS				2.3						4.9							6							2.7				4.0	4.0
		PFOA				0.23						0							0							0				0.1	
9	Burlington Composting	PFOS														2016 Permit has been Terminated														NA	NA
		PFOA																												NA	
10	Boonsboro WWTP	PFOS												4.84					10.4											7.6	15.2
		PFOA												7.67					7.42											7.5	
11	City of Bowie WWTP	PFOS	16					3.9				6.8							13							11.4				8.8	10.1
		PFOA	3.4					0				0							1.4							1.31				1.4	
12	Cox Creek WWTP	PFOS	6.9	0				3.7				5.7							30		4.6					5.8				8.3	8.5
		PFOA	0	0				0				0.95							0		0.63					0.95				0.2	
13	Cumberland WWTP (pellet) j. DiFonzo Water Reclamation	PFOS		5.8						6.5						5.6								4.7						5.7	6.2
		PFOA		0						0.33						0.4								0.5						0.5	
14	Damascas WWTP	PFOS	17.6	9.2						13		<23				14					24					18				15.6	22.6
		PFOA	9.1	7.5						4.4		<23				3.1					9.5					6.3				6.9	
15	Deep Creek Lake WWTP (Currently landfilled)	PFOS	119																		55.9									55.9	87.1
		PFOA	37																		31.2									31.2	
16	Dorsey Run WWTP	PFOS	2.1			3				0																				1.5	2.3
		PFOA	ND			0.81				0																				0.8	
17	Easton WWTP	PFOS				3.7						13				4.1								7.9						7.2	10.9
		PFOA				2						6				1.3								3.1						3.7	
18	Elkton WWTP - Composting	PFOS								7.8						3.9								3.6						5.1	7.4
		PFOA								2.5						1.2								3.1						2.3	
19	Frederick City WWTP	PFOS	18.6	8.37				8.89				8.8				11.4					7.76					7.68				8.8	9.7
		PFOA	1.1	0.867				0.545				0.636				0.83					0					2.4				0.9	
20	Freedom District WWTP	PFOS	8.5	0.57						6.9											8.09			9.33						6.2	8.4
		PFOA	6.5	1.6						0											3.55			3.53						2.2	
21	Grantsville WWTP	PFOS						0																						0.0	9.8
		PFOA						9.8																						9.8	
22	Hagerstown Pelletizer - City Hagerstown WWTP	PFOS		8.4				7.4				15				12										4.6		5.1		8.8	9.9
		PFOA		1.4				0.83				1.8				1.4										0.67		0.81		1.2	
23	Havre de Grace POTW/Class B	PFOS	44.2					27.7				27.7				33.1														29.5	34.9
		PFOA	9.3					5.1				4.9				6.1														5.4	
24	Leonardtown WWTP	PFOS	11.7					11.5																						11.5	17.2
		PFOA	5					5.73																						5.7	
25	Little Patuxent WWTP/Class A Heat Drying	PFOS	8.6			1.8	23	8.5	6.9	9	8.5	10		6.3	8	7.2	8.7		12		14	9.7		No sampling		17	19			10.6	11.7
		PFOA	2.4			0.15	3.6	0.97	0.86	0.82	0.77	0		0.85	0.82	1.1	1.3		0.78		1.8	1.1		No sampling		1	0.98			1.1	
26	Marlay-Taylor WRF-St. Mary's	PFOS	7.9	34								9.8				11								11						16.5	21.1
		PFOA	1	14								0				0								1.4 J						4.7	
27	Maryland City WWTP	PFOS	4			1.4						2.6							2.9							3.2				2.5	3.4
		PFOA	2.1			0.24						0.76							0							2.3				0.8	

KEY: 50PPB OR ABOVE | 25-50PPB | BELOW BUT NEAR 25PPB | BELOW 20PPB

	Facility Name	Analyte	2023 data	January		February		March		April		May		June		July			August		September			October		November		December		12-month Running Average	
				Sample 1	Sample 2 (if app)	Sample 1	Sample 2 (if app)	Sample 1	Sample 2 (if app)	Sample 1	Sample 2 (if app)	Sample 1	Sample 2 (if app)	Sample 1	Sample 2 (if app)	Sample 1	Sample 2 (if app)	Sample 3	Sample 1	Sample 2 (if app)	Sample 1	Sample 2 (if app)	Sample 3	Sample 1	Sample 2 (if app)	Sample 1	Sample 2 (if app)	Sample 1	Sample 2 (if app)	Each Analyte	PFOA+PFOS Combined
28	Maryland Corretional Institute WWTP	PFOS	9.8	1.6						2.3						10.2								5.78						5.0	7.3
		PFOA	6.4	1.6						1.3						3.5								3.04						2.4	
29	Mattwoman WWTP	PFOS	5.2	2.01				5.1				5.1				6.2								6.3				6.8		5.3	6.0
		PFOA	ND	0.263				1.4				0.45				0.66								0.81				1		0.8	
30	Milwaukee Milorganite Pelletizer	PFOS	0.2	2.5		3.5		1.6		2.5		1.7		5.5		19			6.9		21			5.8		3.6		9.1		6.9	8.1
		PFOA	0.045	0.19		0.18		0.18		0.34		0.25		0.39		0.59			0.42		11			0.26		0.29		0.88		1.2	
31	Mount Airy WWTP	PFOS	10.5				Missing Sample							2.22					2.13							1.8				2.1	2.6
		PFOA	3.3											1					0							0.79				0.6	
32	Mt. St. Mary's University WWTP	PFOS	111									0.14																		0.1	0.2
		PFOA	36									0.028																		0.0	
33	Ocean City WWTP	PFOS	3.7			5.9				5.6				1.5					1.6					4.3						3.8	4.3
		PFOA	ND			0.79				0.98				0.3					0					0.67						0.5	
34	Parkway WWTP	PFOS	6.2			4.6		5.4				6.6				0					7					5.5				4.9	6.4
		PFOA	2.7			1.4		0				6.6				1					0					0				1.5	
35	Patuxent WWTP	PFOS	4.2	3.1				3.8				5.4							9.4		2.2			4.8						4.8	5.5
		PFOA	2.8	1				0				1.9							0		0			1.3						0.7	
36	Philadelphia Renewable Bio-Fuels, LLC (Pelletizer)	PFOS	12	9.5		8.5		9.86		9.6		13.2		11.9		10.5			11		14.7			12.7			14.3			11.4	12.6
		PFOA	1.4	1.3		0.74		0.836		1.1		1.15		1.25		0.95			0.94		1.72			1.32			1.14			1.1	
37	Piscataway WWTP-Bioenergy	PFOS	28.8	36		36		40	39	42		29	28	31		27	25		32		18	52		19		19	22			30.9	34.3
		PFOA	5.3	1.7		2.8		2.4	2.4	2.6		6.2	9.8	1.7		0	2.7		0		1.2	16		1.6		0	2.3			3.3	
38	Fort George G. Meade _Fort Meade WWTP	PFOS		13.3						17.1						2.1								10.5						10.8	12.9
		PFOA		2.1						2						2.2								2.3						2.2	
39	QA 1-Kent Island WWTP _ Kent Narrows/Stevensville /Grasonville	PFOS	23.9			2.4						15.9							27											15.1	20.9
		PFOA	7.4			7						4.26							6.1											5.8	
40	Rock Hall WWTP	PFOS	55.7																											NA	NA
		PFOA	10.8																											NA	
41	Seneca Creek WWTP	PFOS	16.6			0.3		13	7.1			11				21			12		16	12				12				11.6	14.1
		PFOA	5.7			2.5		2.9	1.8			<6.6				0			2.9		3	3				4				2.5	
42	Sod Run WWTP	PFOS	10.5	7.1				6.4				2.4				2.1					11.9					15.1				7.5	9.5
		PFOA	2.1	2.3				1.2				2.4				2.2					2					2.1				2.0	
43	Synagro-Baltimore, LLC - Pelletech at Back River went offline	PFOS								0.311						10					7.4									5.9	6.4
		PFOA								0						0.81					0.8									0.5	
44	Synagro Baltimore Patapsco Pelletizer stop drying	PFOS		3.5				Dryers have stopped				Dryers have stopped				Dryers have stopped														3.5	4.7
		PFOA		1.2																										1.2	
45	Taneytown WWTP	PFOS	40.5					13																						13.0	18.2
		PFOA	8.5					5.2																						5.2	
46	UPRC/Westernport WWTP	PFOS												No Sludge Was Produced.		No Sludge Was Produced.														NA	NA
		PFOA																												NA	
47	Valley Forge WWTP	PFOS		4.7				6.2				5.2				2.4					6.9					6.2				5.3	7.7
		PFOA		2.3				2.6				2.4				2.5					2.2					2.7				2.5	
48	Watershed Resource Center- Baltimore	PFOS		1.7	3.1			0.36	4.6			2.1	3.2			1.6	1.9	3.6			3.6	3.4	2.7			1.7	3.4			2.6	5.8
		PFOA		2	2.3			0.4	5.3			1.5	5.2			1.2	1.8	2.2			1.5	8.3	1.9			1.7	8.3			3.1	
49	Western Branch WWTP	PFOS	17.9	7.4				8.7				11	11			13	16				14	8.1				8.1				10.8	14.8
		PFOA	7.9	0.71				1.6				6	6			1.7	6.8				12	1.2				0				4.0	
50	Wicomico Shores WWTP	PFOS		15																										15.0	21.0
		PFOA		6																										6.0	

SB719 support letter signed.pdf
Uploaded by: Chris Peot
Position: FWA

water is life®

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,

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,

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

SB0719-EEE_MACo_SWA.pdf
Uploaded by: Dominic Butchko
Position: FWA

Senate Bill 719

Sewage Sludge - Per- and Polyfluoroalkyl Substances - Regulation

MACo Position: **SUPPORT WITH AMENDMENTS**

To: Education, Energy, and the Environment Committee

Date: February 24, 2026

From: Dominic J. Butchko

The Maryland Association of Counties (MACo) **SUPPORTS** SB 719 **WITH AMENDMENTS**. This bill places new limitations on the use of certain wastewater treatment byproducts that exceed specified per- and polyfluoroalkyl substances (PFAS) thresholds. MACo would seek practical improvements to any such legislative plan, to ensure reasonable implementation.

Sewage sludge from wastewater treatment facilities is commonly repurposed for beneficial uses, most often in agriculture and land reclamation. Because it contains organic matter and nutrients such as nitrogen and phosphorus, treated sludge—often referred to as biosolids—can be applied as fertilizer to improve soil health and crop yields. In Maryland, approximately half of biosolids generated by wastewater treatment facilities are currently used in agriculture.

SB 719 would limit or prohibit the use of biosolids based on defined PFAS thresholds. As the primary operators of much of Maryland's public water and wastewater infrastructure, counties are on the front lines of responding to PFAS contamination and protecting public health. A central policy challenge, however, is determining how compliance costs are allocated—between residential ratepayers and responsible parties. County concerns generally fall into two categories: ratepayer impacts and implementation feasibility.

Ratepayer Impacts

SB 719 could—whether intentionally or not—shift significant costs onto residential ratepayers at a time when Marylanders are already contending with rising energy bills and broader economic uncertainty. As drafted, the bill does not adequately address how utilities, which are primarily funded through user fees, would finance the upgrades necessary to reduce PFAS concentrations to acceptable levels. Baltimore City has estimated that, as drafted, the legislation could create an unfunded mandate approaching $1 billion—costs that would likely translate into rate increases for Baltimore City and for customers in served areas of Anne Arundel, Baltimore, and Howard counties.

Implementation Feasibility

Beyond the overarching concerns about potential ratepayer impacts, counties also have technical questions about how the bill would be implemented in practice. Several of the bill's timelines and compliance deadlines appear misaligned with the real-world sequence of work required, particularly where treatment upgrades and system modifications are involved. As a result, certain dates may be

technically infeasible or could impose significant unanticipated operational and staffing burdens on utilities that would be difficult or impossible to absorb.

MACo is currently in discussions with the sponsor, advocates, the Department of the Environment, and the Maryland Association of Municipal Wastewater Agencies on amendments to address county concerns and ease the pressures on local ratepayers.

Counties stand ready to partner with the Committee and stakeholders to confront PFAS challenges in a practical, enforceable manner that protects public health without creating unmanageable local fiscal impacts. While counties have identified a number of challenges with the legislation as drafted, none of these issues are insurmountable. For this reason, MACo urges the Committee to issue SB 719 with a **FAVORABLE WITH AMENDMENTS** report.

SB0719_FWA_Synagro_Sewage Sludge - Per- and Polyfl
Uploaded by: Drew Vetter
Position: FWA

Senate Education, Energy, and the Environment Committee
February 24, 2026
Senate Bill 719 – *Sewage Sludge – Per- and Polyfluoroalkyl Substances – Regulation*
POSITION: SUPPORT WITH AMENDMENT

Synagro WWT, Inc. (Synagro) is the largest recycler of organic by-products in the United States. Providing essential environmental solutions to over 600 public and private water and wastewater treatment facilities in the municipal and industrial sectors, the Company operates in every part of the nation, including Maryland, and employs more than 750 people. Synagro's direct land application and reclamation program is a proven, time-tested management approach, ensuring the beneficial use of biosolids and other suitable residuals. Synagro wishes to register a position of **support with amendments** for Senate Bill 719.

This bill sets several limitations on the land application of biosolids. Biosolids recycling is a well-established and regulated practice that provides essential nutrients to soils, reduces reliance on chemical fertilizers, and supports healthy crop production. Existing federal and state regulations, including those established by the U.S. Environmental Protection Agency under 40 CFR Part 503, already set stringent safety standards for the treatment and application of biosolids. These standards have been developed through extensive scientific research and risk assessments to protect human health and the environment. Synagro understands the intent of this legislation to limit the release of per- and polyfluoroalkyl substances (PFAS) into the environment; however, we request that the bill be amended to allow implementation over a reasonable timeframe and to strike the appropriate balance between continued land application at reasonable levels and the bill's goal of setting PFAS limits.

We appreciate that the bill sponsors and advocates for legislation worked over the interim to engage stakeholders and to address several concerns raised about last year's version of this legislation. We further appreciate that the limits proposed by this bill are anchored in sewage sludge testing data that have been collected by the Maryland Department of the Environment (MDE), which was not available when the legislature deliberated on this issue last year. Incorporating elementsm, such as the ability to blend materials to achieve lower PFAS concentrations, sampling based on an averaging approach, and efforts to identify and mitigate PFAS contamination sources are welcome components of this year's proposal.

However, as drafted, the bill still has several challenging elements. Most of Synagro's concerns pertain to the approach to land application when PFAS testing levels are between 25 and 50 parts per billion. Under the bill, land application is limited to this level at a rate not exceeding 3 dry metric tons per hectare for a period of not more than 12 months. This rate is significantly more limited than MDE's published guidance on this issue, which Synagro supports and complies with. Under the MDE guidance, if PFOS or PFOA is at or above 20 ppb, but less than 50 ppb, the recommended application rate for land application of biosolids must be lowered to 3 dry tons per acre or less. A hectare, which is contemplated by the bill, is a significantly larger area than an acre. One hectare equals 2.47 acres. Therefore, the bill requires spreading biosolids more thinly across a much larger land area. It is unclear why the bill takes such a starkly different approach from MDE's well-thought-out guidance on the same topic. We would urge replacing "hectare" with "acre". We are further concerned about the 12-month time limitation. While we have been encouraged by the MDE testing data we have seen thus far, it is not uncommon for samples

to be within the 25-50 ppb range. Providing the land application flexibility intended by this section for only 12 months could have serious and costly consequences for the processing and disposal of sewage sludge.

Synagro has been in contact with the Maryland Association of Counties (MACo) and the Maryland Association of Municipal Wastewater Agencies (MAMWA) regarding these issues and understand they have submitted amendments to address the issues above, including the time limitation for land application within the 25-50 ppb range, using an "acre" standard rather than "hectare," and other proposed changes intended to better position Maryland's Publicly Owned Treatment Works to achieve the goals of this legislation within a realistic timeframe.

To the extent that this legislation hinders land application of biosolids, we must also remind the committee of the environmental impacts of the alternatives. Without land application, alternatives include landfilling, incineration, or transportation to other states. Each of these alternatives carries its own set of environmental risks and costs that must be considered.

Synagro is committed to ensuring that Maryland's biosolids program remains sustainable, practical, and protective of public health. We encourage the General Assembly to consider the broader economic impacts of this legislation, and to thoroughly examine alternatives and the consequences of the legislation as drafted. We urge strong consideration of the amendments proposed by MACo and MAMWA.

For more information call:
Andrew G. Vetter
J. Steven Wise
Danna L. Kauffman
(410) 244-7000

SB719_Clean Water Action_FWA.pdf
Uploaded by: Emily Ranson
Position: FWA

SB719: Sewage Sludge – Per and Polyfluoroalkyl Substances - Regulation
Senate Education, Energy, and the Environment Committee
February 24, 2026

Position: Favorable with Amendments

Dear Chair Feldman and Members of the Committee,

Clean Water Action respectfully requests a favorable report on SB719 to establish a limit on toxic PFAS found in sewage sludge (biosolids) that is spread on Maryland's farm fields, as well as identify and mitigate upstream sources of PFAS pollution before it is co-mingled with other wastes in our wastewater treatment plants.

PFAS are a class of more than 12,000 chemicals that are used to make products resist grease, oil, water, or heat. They are commonly found in cookware, cosmetics, clothing, carpets, firefighting foams, and many other products. They are also widely used in industrial processes, where they are passed down to wastewater treatment plants. They remain present in the biosolids which are marketed to farmers as fertilizer.

PFAS chemicals are a public health concern and are linked to a wide range of public health concerns including weaker immune systems, cancer, cholesterol, pregnancy-induced hypertension, liver damage, reduced fertility, and thyroid disease.

The EPA's January 2025 draft Sewage Sludge Risk Assessment highlights severe risks at levels as low as 1-5 parts per billion. SB719 includes tiers to manage PFAS contaminated sewage sludge at:

- >50 ppb: land application allowed
- 25-49 ppb: mitigation plan required with temporary management requirements
- <25 ppb: no restrictions

SB719 offers higher limits to PFAS contamination than in the EPA assessment, so while we look at SB719 as a meaningful step towards reducing contaminated sludge application and reducing upstream sources, it is not a panacea for PFAS pollution.

We appreciate that the bill includes source tracking, industrial pretreatment standards, and a polluter pays model.

SB719 reflects significant work from various stakeholders and when enacted will meaningfully reduce PFAS application and provide the state with an important framework to reduce upstream PFAS discharges.

Thank you and we urge a favorable report with a reduced threshold for application,

Emily Ranson
Clean Water Action
eranson@cleanwater.org

SB 719 MES SUPPORT WITH AMENDMENTS.pdf
Uploaded by: Jeff Tosi
Position: FWA

Maryland ENVIRONMENTAL SERVICE

Wes Moore **GOVERNOR**
Aruna Miller **LT. GOVERNOR**
Charles Glass, Ph.D., P.E. **EXECUTIVE DIRECTOR**

February 24, 2026

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

Re: Senate Bill 719 – Sewage Sludge - Per- and Polyfluoroalkyl Substances - Regulation

Dear Chair Feldman and Distinguished Members of the Committee,

The Maryland Environmental Service (MES) supports SB 719, with amendments. Per- and polyfluoroalkyl substances (PFAS) have become widely dispersed throughout the environment due to decades of extensive use in industrial processes and consumer products. Their chemical stability—once valued for performance—has resulted in extreme persistence in soil, water, air, and living organisms. As a result, PFAS are now detected in surface waters, groundwater, drinking water supplies, sediments, wildlife, and human populations across the country.

The proliferation of PFAS presents a significant and long-term environmental and public health challenge. Scientific evidence links certain PFAS compounds to adverse health effects, including developmental, immune, and cardiovascular impacts, underscoring the need for proactive and sustained action. Addressing PFAS contamination requires coordinated efforts to identify sources, prevent further releases, remediate impacted media, and manage PFAS-containing wastes, while adapting to evolving regulatory standards and scientific understanding. Failure to act risks compounding environmental liabilities, increasing remediation costs, and eroding public trust in environmental stewardship.

This bill addresses PFAS in biosolids, an area in which MES is inextricably linked. MES manages around 90 (this fluctuates based on client need) wastewater treatment plants (WWTPs) across the State, and annually treats ~2,462.69 dry tons of biosolids, ~45% of which is land applied and ~41% of the treated biosolids are landfilled (the remaining is untreated liquid sewage sludge transported to other WWTPs for further treatment or establishing biomass for wastewater treatment processes).

The bill would set limits on the concentration of PFAS that can be land applied in future years. MES is generally in agreement with this approach, but there are several areas of the bill that we feel warrant further discussion and attention.

1. Page 9, lines 26-29. This provision sets an unreasonable standard for lab testing and may result in a severe shortage of available labs. We recommend broader language that would give MDE flexibility in setting minimum standards for accredited labs.

2. The bill identifies several different forms of biosolids - blended, commingled, products containing sewage sludge. These terms are undefined in the bill and, as an operator of WWTPs in the state, we are unclear what they will mean with the new PFAS limits in place. This has impacts on WWTPs because under the bill, if a facility blends or commingles, it appears this will result in

a de facto ban on land applying if the concentrations exceed 25 parts per billion (PPB).

3. Timelines in the bill are a bit awkward or contradictory.
    a. The bill is effective October 1, 2026. Subsection (c) says, starting October 1, 2027, no land application ≥ 50 PPB. If between 25 - 50 PPB, then (E)(F) (mitigation plan and increased testing). But subsection (d) says that between October 1, 2026, and September 30, 2029, blended/commingled is permitted, but cannot land apply if concentrations ≥25 PPB. The bill seems to prohibit land application of blended/commingled materials between October 1, 2026 - September 30, 2027, but on October 1, 2027 land application of blended/commingled materials is permissible, but only if the concentration is below 25 PPB. Again, we are not clear on the difference between "product containing" and "blended"/"commingled".
    b. The bill says blending or commingling is permissible until September 30, 2029, but the bill is not clear on what happens after September 30, 2029. Does that mean the bill places a ban on blending/commingling starting October 1, 2029? This appears to phase out products that are currently in the market that are designed for specific agricultural uses as well as some currently available storage practices. This limits the available land application storage and products.

MES is committed to working with the bill sponsor and stakeholders on this and we look forward to contributing to Maryland being a leader in tackling this very important environmental problem.

Contact: Jeff Tosi, Director of Strategy and Government Affairs
Phone/Email: 410-729-8504 (w) | jtosi@menv.com

2026.02.20 MAMWA Letter SWA SB 719v2.pdf
Uploaded by: Lisa Ochsenhirt
Position: FWA

Maryland Association of Municipal Wastewater Agencies, Inc.
Washington Suburban Sanitary Commission
14501 Sweitzer Lane, 7th Floor
Laurel, MD 20707
Tel: 301-206-7008

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 the Maryland Association of Municipal Wastewater Agencies (MAMWA), I am writing to **SUPPORT WITH AMENDMENTS SB 719**, which would restrict the land application of sewage sludge (biosolids) if PFOS and PFOA in the biosolids reach certain threshold levels.

MAMWA is a statewide association of local governments and wastewater treatment agencies that serve approximately 95% of the State's sewered population. An integral part of the treatment process involves generating sewage sludge, which is then treated to become biosolids; the State's wastewater treatment plants generate over 100,000 dry tons of biosolids per year, with a large percentage of that biosolids land applied on farms.

Before turning to substantive comments, MAMWA would like to thank bill sponsors Senator Love and Delegate Stein for engaging with MAMWA and many of our individual Members during the interim between the 2025 and 2026 Sessions. We welcome the opportunity to participate in future discussions on how best to balance PFAS reductions with affordability concerns. MAMWA's goal is to work to ensure that the legislation considers the financial feasibility of alternatives if there are land application restrictions, gives wastewater plants enough time to tackle this tough challenge, and provides adequate financial resources to do so. Wastewater plants do not create PFAS—**our customers and your constituents** should not be asked to bear the full burden of solving this Statewide issue. MAMWA will be submitting separate testimony in **SUPPORT** of **SB 686** for this reason.

MAMWA Members are actively participating in efforts to reduce PFAS loadings to their sewer systems in response to the Protecting State Waters from PFAS Pollution Act (Md. Code, ENV. § 9-343, et seq.). If SB 719 passes, MAMWA Members will also be working to implement its requirements. This work cannot be done overnight. In the interim, while wastewater treatment plants are tracking PFAS sources and

working with industrial customers to reduce levels, plants must have a viable and reasonable biosolids land application program.

MAMWA requests amendments to SB 719 that would give wastewater treatment plants the necessary time to conduct source tracking studies and implement mitigation plans, while still allowing for land application under reasonable conditions. If plants 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 wastewater treatment plant incurs would unfortunately be passed on to **our customers and your constituents**.

For these reasons, MAMWA urges the Committee to **AMEND** SB 719 to provide additional protections for local wastewater treatment plants. MAMWA's requested amendments are attached.

Please feel free to contact me with any questions at Lisa@AquaLaw.com or 804-716-9021.

Sincerely,

Lisa M. Ochsenhirt
MAMWA Deputy General Counsel

cc: Education, Energy, and the Environment Committee Members, SB 719 Sponsors

AMENDMENTS TO SENATE BILL 719
(First Reading File Bill)

AMENDMENT NO. 1

On page 5, in line 7, after "**APPLICATION**"**,** add "**IN MARYLAND**";

Bill Text:

(B) THIS SECTION APPLIES ONLY TO SEWAGE SLUDGE AND PRODUCTS CONTAINING SEWAGE SLUDGE THAT ARE INTENDED FOR LAND APPLICATION.

Explanation for Requested Amendment:

The current bill text is unclear regarding the geographic scope of the provisions. Generators assume this is limited to land application in the State of Maryland.

AMENDMENT NO. 2

On page 5, in line 8, strike "**2027**"**,** and substitute "**2029**";

Bill Text:

(C) ON OR AFTER OCTOBER 1, 2027: (1) A PERSON MAY NOT APPLY SEWAGE SLUDGE OR A PRODUCT CONTAINING SEWAGE SLUDGE TO AGRICULTURAL OR MARGINAL LAND IF THE SEWAGE SLUDGE OR PRODUCT CONTAINING SEWAGE SLUDGE HAS A TOTAL CONCENTRATION OF REGULATED PFAS EQUAL TO OR GREATER THAN 50 PARTS PER BILLION;

Explanation for Requested Amendment:

Generators with biosolids that have PFAS levels in the middle tier (equal to or greater than 25 ppb but less than 50 ppb) will need two years before the tiered system is put in place to solicit and procure the necessary contracts to meet the additional management measures.

AMENDMENT NO. 3

On page 5, in line 20, strike beginning with "**ON**" through "**2029,**" and substitute "**DURING THE DEVELOPMENT AND IMPLEMENTATION OF THE SOURCE TRACKING STUDY AND MITIGATION PLAN IN SUBSECTION (F), AND**";

Bill Text:

(D) (1) ON OR BEFORE SEPTEMBER 30, 2029, SUBJECT TO THE REQUIREMENTS OF THIS SUBSECTION AND IN ACCORDANCE WITH DEPARTMENT REGULATIONS: (I) A PERSON MAY BLEND SEWAGE SLUDGE FROM MULTIPLE SOURCES TO REDUCE THE TOTAL CONCENTRATION OF REGULATED PFAS IN THE FINAL MATERIAL TO LEVELS BELOW 25 PARTS PER BILLION;

Explanation for Requested Amendment:

SB 719 prohibits the use of blending to reduce PFAS levels beginning on September 30, 2029. A generator should be authorized to blend its biosolids for as long as that generator is developing and implementing its source tracking and mitigation plans. A generator should not be required to seek out costly (or even unavailable) alternatives to land application while undertaking this work because of an arbitrary end-date.

AMENDMENT NO. 4

On page 5, in line 23, after "**SOURCES**" add "**,OR MAY BLEND SEWAGE SLUDGE WITH NON-SEWAGE SLUDGE"**;

Bill Text:

(1) A PERSON MAY BLEND SEWAGE SLUDGE FROM MULTIPLE SOURCES TO REDUCE THE TOTAL CONCENTRATION OF REGULATED PFAS IN THE FINAL MATERIAL TO LEVELS BELOW 25 PARTS PER BILLION; AND

Explanation for Requested Amendment:

Many of Maryland's generators blend biosolids with other materials to enhance the structure and carbon levels of the material. Please clarify the text to reflect this reality.

AMENDMENT NO. 5

On page 6, in line 5 strike "**(G)**" and substitute "**(G)(4)**";

Bill Text:

(2) A PERSON THAT BLENDS OR OTHERWISE COMMINGLES SEWAGE SLUDGE FOR THE PURPOSE OF LAND APPLICATION SHALL MONITOR FOR THE PRESENCE OF PFOS AND PFOA AT LEAST ONCE PER MONTH, USING A REPRESENTATIVE SAMPLE, IN ACCORDANCE WITH PROTOCOLS ESTABLISHED UNDER SUBSECTION (G) OF THIS SECTION.

Explanation for Requested Amendment:

The text in subsection (G) is not a good fit for a blender, who may be a third-party contractor that is blending materials in a location that is not the wastewater treatment facility. In that case, a blender would not be sampling "at the point where sewage sludge leaves the wastewater treatment facility." MAMWA submits it is cleaner to simply point to (G)(4) which allows MDE to establish monitoring requirements for blended materials.

AMENDMENT NO. 6

On page 6, in lines 19 and 20, strike beginning with "**FOR**" through **"(F),**" and substitute "**DURING THE DEVELOPMENT AND IMPLEMENTATION OF THE SOURCE TRACKING STUDY AND MITIGATION PLAN IN SUBSECTION (F),**";

Bill Text:

(2) FOR A PERIOD OF NOT MORE THAN 12 MONTHS, AND PENDING THE DEVELOPMENT AND APPROVAL OF A MITIGATION PLAN UNDER SUBSECTION (F) OF THIS SECTION, A PERSON MAY APPLY SEWAGE SLUDGE AND OTHER PRODUCTS DESCRIBED UNDER PARAGRAPH (1) OF THIS SUBSECTION TO LAND:

Explanation for Requested Amendment:

The State's generators assume the intent is to allow continued land application while the generator is implementing source tracking and mitigation plans. Please clarify the text.

AMENDMENT NO. 7

On page 6, in line 24, strike "**HECTARE**" and substitute "**ACRE**";

Bill Text:

(2) FOR A PERIOD OF NOT MORE THAN 12 MONTHS, AND PENDING THE DEVELOPMENT AND APPROVAL OF A MITIGATION PLAN UNDER SUBSECTION (F) OF THIS SECTION, A PERSON MAY APPLY SEWAGE SLUDGE AND OTHER PRODUCTS DESCRIBED UNDER PARAGRAPH (1) OF THIS SUBSECTION TO LAND: (I) AT A RATE THAT DOES NOT EXCEED 3 DRY METRIC TONS PER HECTARE;

Explanation for Requested Amendment:

One of the additional management measures in SB 719 is biosolids application at a reduced rate of 3 dry metric tons per hectare. Biosolids land application is more commonly measured based on dry metric tons per acre. Translating 3 dry metric tons per hectare would result in a land application rate of approximately 1.2 dry metric tons per acre. Spreading equipment cannot physically apply at this level. As written, SB 719 would effectively create a de facto ban on land application for materials with PFAS levels equal to or greater than 25 ppb but less than 50 ppb. We do not believe this is the intent of the bill.

AMENDMENT NO. 8

On page 6, in line 30, after "**DEPARTMENT**" add "**:**" and strike beginning with "**AFTER**" in line 30 of page 6 through line 32 on page 6, inclusive**;**

Bill Text:

(2) FOR A PERIOD OF NOT MORE THAN 12 MONTHS, AND PENDING THE DEVELOPMENT AND APPROVAL OF A MITIGATION PLAN UNDER SUBSECTION (F) OF THIS SECTION, A PERSON MAY APPLY SEWAGE SLUDGE AND OTHER PRODUCTS DESCRIBED UNDER PARAGRAPH (1) OF THIS SUBSECTION TO LAND: (II) SUBJECT TO: (2) ADDITIONAL SETBACKS FOR LAND APPLICATION NEAR PUBLIC AND PRIVATE WATER SUPPLY WELLS DEVELOPED BY THE DEPARTMENT AFTER CONSULTATION WITH ADJACENT LANDOWNERS AND COUNTY AND MUNICIPAL OFFICIALS FROM EACH LOCAL JURISDICTION LOCATED WITHIN 1 MILE OF THE PROPERTY BOUNDARY.

Explanation for Requested Amendment:

One of the additional management measures in SB 719 is additional setbacks for land application near public and private water supply wells developed by the Maryland Department of the Environment (MDE) after consultation with adjacent landowners and local officials within 1 mile of the property boundary. MDE is the subject matter expert; MDE alone should be tasked with determining whether additional buffers are warranted after consulting with the generator.

AMENDMENT NO. 9

On page 7, in line 10, after "**SUBSECTION**" add "**NO LATER THAN APRIL 1, 2028.**";

Bill Text:

(I) COMPLETE A SOURCE TRACKING STUDY IN ACCORDANCE WITH PARAGRAPH (3) OF THIS SUBSECTION.

Explanation for Requested Amendment:

SB 719 does not have a firm deadline for submitting a source tracking study. Generators are committed to sustainable and cost-effective PFAS reductions and offer this deadline for clarity and in the spirit of the bill.

AMENDMENT NO. 10

On page 7, in lines 32 and 33, strike "**,NOT TO EXCEED TWO YEARS,**";

Bill Text:

(4) (I) A MITIGATION PLAN DEVELOPED UNDER THIS SUBSECTION SHALL: 5. INCLUDE A REASONABLE TIMELINE, NOT TO EXCEED 2 YEARS, FOR IMPLEMENTING THE MITIGATION PLAN.

Explanation for Requested Amendment:

This timeframe is too short. Generators will need well more than two years to implement a mitigation plan. We also believe industrial users will need more than two years to add needed treatment at their facilities to reduce PFAS levels.

AMENDMENT NO. 11

On page 9, after "**OPTIONS**" in line 3 add "**(III) IF THE COST OF IMPLEMENTING MITIGATION OPTIONS WILL INCREASE THE SEWAGE SERVICE RATES THE SEWAGE SLUDGE GENERATOR CHARGES ITS RESIDENTIAL RATEPAYERS FOR SEWER SERVICE BY MORE THAN A DE MINIMIS AMOUNT, THE DEPARTMENT SHALL ALLOW THE SEWAGE SLUDGE GENERATOR TO CONTINUE LAND APPLICATION OF SEWAGE SLUDGE, WITH NO SPECIFIED END DATE, IN ACCORDANCE WITH SUBSECTIONS (D) AND (E) OF THIS SECTION**";

Explanation for Requested Amendment:

A generator that develops an implementation plan that would be unreasonably expensive to implement should have an off-ramp from having to spend significant sums. The State's POTWs want to keep sewer rates affordable for all Marylanders.

AMENDMENT NO. 12

On page 9, in line 25, after "**QUARTERLY**" add "**(IV) UPON REQUEST BY A SEWAGE SLUDGE GENERATOR WHO HAS DEMONSTRATED PFAS LEVELS BELOW 25 PPB FOR A PERIOD OF ONE YEAR, THE DEPARTMENT MAY REDUCE THE FREQUENCY OF SAMPLING TO LESS THAN QUARTERLY**";

Explanation for Requested Amendment:

A generator with biosolids that are consistently measuring below 25 ppb should be granted reduced monitoring to save unnecessary, indefinite sampling costs.

AMENDMENT NO. 13

On page 9, in lines 28 and 29, strike "**AND SUBJECT TO A LABORATORY LEVEL OF QUANTITATION FOR BIOSOLIDS ANALYSIS NOT TO EXCEED 2 PARTS PER BILLION**";

Bill Text:

(3) (I) SAMPLES SHALL BE ANALYZED USING A METHOD APPROVED BY THE DEPARTMENT AND CONDUCTED BY A LABORATORY CERTIFIED TO PERFORM THE METHOD AND SUBJECT TO A LABORATORY LEVEL OF QUANTITATION FOR BIOSOLIDS ANALYSIS NOT TO EXCEED 2 PARTS PER BILLION.

Explanation for Requested Amendment:

We are not aware of any lab that has a level of quantitation this low. Requiring monitoring using EPA Method 1633 at a qualified lab should be sufficient to ensure samples are being appropriately managed.

SB0719-EEE-FWA.pdf
Uploaded by: Nina Themelis
Position: FWA

BRANDON M. SCOTT
MAYOR

Office of Government Relations
88 State Circle
Annapolis, Maryland 21401

SB0719

February 24, 2026

TO: Members of the Education, Energy, and the Environment Committee

FROM: Nina Themelis, Director of Mayor's Office of Government Relations

RE: Senate Bill 719 - Sewage Sludge – Per- and Polyfluoroalkyl Substances - Regulation

POSITION: SUPPORT WITH AMENDMENTS

Chair Feldman, Vice Chair Kagan, and Members of the Committee, please be advised that the Baltimore City Administration (BCA) **supports** Senate Bill (SB) 719 **with amendments**.

SB 719 requires new limits on the land application of sewage sludge and products containing sewage sludge based on concentrations of certain per- and polyfluoroalkyl substances (PFAS). Beginning October 1, 2027, the bill prohibits the land application of sewage sludge with PFAS concentrations at or above 50 parts per billion and establishes additional conditions for sludge with concentrations between 25 and 50 parts per billion. The bill requires sewage sludge generators that exceed these thresholds to conduct source tracking studies and develop mitigation plans, subject to review by the Department of the Environment. SB 719 also establishes PFAS monitoring requirements, allows limited blending of sewage sludge to reduce PFAS concentrations, and authorizes pretreatment standards, rates, and fees for industrial users that contribute significant PFAS discharges.

The BCA remains committed to addressing the evolving challenge of PFAS and their impacts on public health and the environment. Baltimore City operates the Back River and Patapsco wastewater treatment plants, the two largest wastewater treatment facilities in Maryland, which together serve Baltimore City and Baltimore County and provide critical wastewater treatment services to approximately 1.6 million residents across the region. BCA supports SB 719 with amendments and acknowledges the effort to establish a framework for managing PFAS in sewage sludge.

In adopting such a framework, BCA also supports a systemwide approach to PFAS management that includes measures to reduce PFAS at the source, including product phase-out legislation such as SB 686. **While BCA supports the initiative, SB719 as drafted presents significant implementation and compliance challenges related to the proposed timeline**. Adopting a broader implementation timeline and providing additional time before the tiered land application restrictions take effect would allow for effective source tracking, mitigation plan development, and effective implementation of the bill's requirements.

Under SB 719's current timeline, Baltimore City would be unable to meet Tier 1 requirements by

the October 1, 2027 effective date, resulting in severely limited local biosolids management options. If the City is unable to land apply its biosolids, it would be required either to landfill 100% of its biosolids or to install additional treatment at both wastewater treatment plants.

In the absence of additional time, the City estimates that disposing of biosolids through landfilling could cost approximately $50 million, assuming landfill capacity is available. Installation of PFAS treatment technologies presents even greater challenges, as the only commercially mature options, such as incineration or pyrolysis or gasification, would require capital investments approaching $650 million at the Back River facility and $300 million at the Patapsco facility, costs that would ultimately be borne by ratepayers.

As a result, the City would be required to transport biosolids out of state for disposal, creating significant operational challenges and substantially increasing costs. These increased disposal and transportation costs would ultimately be borne by ratepayers, who are already facing significant increases in their monthly utility bills. Amendments consistent with those outlined by the Maryland Association of Municipal Wastewater Agencies (MAMWA) would provide a more practical, phased approach that maintains environmental protections while allowing for feasible implementation.

Additionally, extending the implementation date of SB 719 to 2029, along with allowing the continued use of blended biosolids during the interim period, would support the city's compliance with the bill's requirements while maintaining affordability for ratepayers. Blending is an existing, regulated, and monitored practice, and its continued use would provide the city with operational flexibility as source tracking efforts are completed and longer-term mitigation and treatment solutions are developed and implemented. Allowing an extended period for blending before the tiered land application restrictions take effect would also provide the City with the time necessary to procure and implement contracts required to support alternative management measures.

Finally, identifying PFAS sources is a timely process that requires coordination across industrial users, pretreatment programs, and monitoring programs. Developing and implementing effective mitigation plans requires data collection, operational planning, contracting, and eventual implementation. Amending SB 719 to incorporate a phased timeline for source tracking and mitigation, consistent with the amendments proposed by MAMWA, would support the development of effective, long-term solutions.

BCA generally supports a phased, systematic approach to PFAS oversight and believes that flexibility in both implementation and the transition away from existing management practices is critical to achieving positive environmental outcomes while maintaining affordability for ratepayers. For these reasons, the City of Baltimore respectfully requests a **favorable** report **with amendments** on SB719.

FINAL_WSSC_Water_Written_Testimony_SB719.pdf
Uploaded by: Priscilla To
Position: FWA

February 20, 2026

The Honorable Brian Feldman and
Members of the Senate Education,
Energy, and the Environment Committee
Miller Senate Office Building, 2 West Wing
11 Bladen Street
Annapolis, MD 21401

Re: Letter of Support with Amendments
SB719 Sewage Sludge - Per- and Polyfluoroalkyl Substances - Regulation

Dear Chair Feldman and Members of the Education, Energy, and Environment Committee:

The Washington Suburban Sanitary Commission (WSSC Water) appreciates the opportunity to provide a letter of support with amendments regarding **SB719 Sewage Sludge - Per- and Polyfluoroalkyl Substances - Regulation**. We would like to thank the Bill Sponsors for working with the utilities to develop solutions that balance public health and practical implementation.

WSSC Water is a bi-county state agency and self-sustaining public utility currently among the largest water and wastewater utilities in the nation, with nearly 11,000 miles of water and sewer pipeline. Our service area currently spans nearly 1,000 square miles in Prince George's and Montgomery counties. WSSC Water collects 185,000,000 gallons of wastewater per day from 1.9 million residents in our community, and generates 120,000 tons of sewage sludge, or biosolids, each year.

Summary of Proposed Amendments: WSSC Water is broadly supportive of:

- Language affirming source tracking and pretreatment authority.
- Clear standards to guide decision-making and justify significant investments.

To preserve the critical community need for operational continuity in large-scale wastewater management, WSSC Water proposes amendments to:

- Provide additional time before tiered land application restrictions enter effect, for alternative management measures, and mitigation plan implementation.
- Provide for MDE to grant time extensions on alternative management measures and mitigation plan implementation.

As such, WSSC Water staff are supportive of MAMWA's amendments, as drafted.

BACKGROUND

Stopping PFAS at the source: WSSC Water, like many community water and wastewater systems, must address PFAS due to the manufacture and continued use of PFAS in consumer and industrial products. Eliminating PFAS in production and use would prevent PFAS from entering the environmental cycle and is a critical step in reducing PFAS concentrations in our biosolids as well as our wastewater effluent, which is discharged back to state waters. The most effective and cost-efficient solution is to stop PFAS at the source. That is why WSSC Water is also supporting SB686, which calls for PFAS product phaseouts.

What WSSC Water is doing to reduce PFAS from the source: Reducing PFAS in biosolids sustainably is in alignment with our commitment to public health and the environment. WSSC Water invested $1.5M to set up an advanced PFAS lab, which allows us to analyze for PFAS in drinking water, wastewater and biosolids. In 2025, we collected over 400 samples in our water and wastewater systems to understand PFAS concentrations throughout the system. We continue to actively lead and participate in grant-funded research focused on understanding the effect of PFAS on fields receiving municipal sources of biosolids, and testing promising and innovative PFAS destruction technologies that could potentially lower the cost of system-scale PFAS treatment.

Biosolids Management Options: Biosolids can be managed by land application, landfilling, or incineration, and each method comes with its own environmental considerations. Land application is the only method that returns valuable nutrients and organic materials to the soil. The US Environmental Protection Agency Regulations (40 CFR, Part 503) sets specific requirements to ensure land application is done safely to protect public health. Landfilling is a final disposal approach, but it is not a preferred approach. Every community has a finite landfill capacity, and landfilling biosolids permanently uses limited landfill space. Biosolids also contribute to landfill methane emissions, and since landfilling does not deal with contaminants at the source, landfill leachate can deliver contaminants back into the environment, including wastewater treatment plants. Incineration is an energy-intensive process that turns biosolids into ash, but the environmental impacts of polluted air emissions often outweigh the benefits of incineration.

Current operations and PFAS levels: Since 2024, when centralized advanced biosolids processing operations began at our Piscataway Bioenergy Facility, WSSC Water has been sampling PFAS levels in our biosolids on a monthly basis. The average results are:

Analytical Parameter	**Results (parts per billion)**
PFOA	3
PFOS	32
Sum of PFOA & PFOS	35

A total of approximately 120,000 tons of biosolids are generated and land applied annually. Approximately half is received and processed by WSSC Water facilities, and the remainder is received and processed by DC Water.

WSSC Water holds contracts with a solids hauler to land apply biosolids to agricultural land. Land application is performed in accordance with the Code of Maryland Regulations and approved sewage sludge (biosolids) utilization permits from the Maryland Department of the Environment (MDE). The material is applied in accordance with plant nutrient rates under approved nutrient management plans and is not blended or applied at reduced application rates.

IMPACTS & COSTS OF SB719

SB719 would impose restrictions on land application of biosolids containing combined PFOA and PFOS concentrations equal to or more than 25 parts per billion (ppb) beginning on October 1, 2027. Based on current PFAS concentrations in WSSC Water's biosolids, we do not expect to meet this threshold in the current timeframe.

Mitigation Plan: Our source tracking study will determine the contributions of PFAS sources to our wastewater treatment system. Building on the source tracking study, our mitigation plan will focus on reducing PFAS concentrations through our pretreatment authority and other initiatives. With source tracking and mitigation plan implementation, we expect our PFAS levels to fall below 25 ppb in approximately 5-7 years.

Interim Compliance: As a result, WSSC Water would be required to adopt approved alternative biosolids management practices until PFAS levels fall below the 25 ppb limit.

- Blending: As the bill is currently written, WSSC Water does not anticipate relying on the bill's blending provision unless blending is permitted for a longer period of time. Our private-sector partners are unlikely to undertake blending operations for the limited two-year period allowed.
- Reduced Application: SB719 permits reduced-rate land application for a period of no more than 12 months. To comply, WSSC Water would need to decrease application rates, resulting in an estimated additional cost of $7.5M for one year (Note: this cost assumes the unit of measure of 3 dry tons per acre. If using the reduced application rate proposed in SB719, the cost would be substantially higher).
- Landfilling: As introduced, the bill's proposed timelines would effectively eliminate land application as a viable option after two years (for blending) and/or one year (for reduced land application rates). Without established and permitted alternatives in place, landfilling would likely become the only remaining disposal pathway for approximately 6 years. This would result in an estimated additional cost of $8.2M per year. Landfilling also presents significant operational and financial risks, including the potential for landfill capacity constraints, longer hauling distances, and substantially increased costs. Moreover, if neighboring states adopt similar restrictions, regional disposal capacity could tighten further, compounding these challenges.

System-scale Technologies: If industrial pretreatment alone was not adequate or timely, and to counter the risk of insufficient landfill capacity, WSSC Water may opt to install treatment systems to destroy biosolids at our facility, at the estimated cost to ratepayers of $200M. We are currently working to research and develop new technologies that may be able to reduce this capital cost.

The cost of alternative management measures and facility upgrades divert substantial time and resources away from aggressive pursuit of source reductions which provide the most cost-effective long-term benefits by reducing PFAS permanently.

PROPOSED AMENDMENTS AND RATIONALE

WSSC Water is broadly supportive of:

- Language affirming source tracking and pretreatment authority.
- Clear standards to guide decision-making and justify significant investments. Compared to action levels established under the 2024 Protecting State Waters from PFAS Pollution Act, a PFAS limit in biosolids is a stronger basis for establishing industrial pretreatment standards.
- Annual averaging as the basis for evaluating compliance, which accounts for sampling and analysis variability from sample to sample.
- Measures to enhance analytical confidence.

To preserve the critical community need for operational continuity in large-scale wastewater management, WSSC Water proposes the following amendments:

- Provide additional time before tiered land application restrictions enter effect for sufficient time to solicit and procure the necessary contracts to meet the requirements of alternative management measures.
- Extend the 2-year deadline for blending and 12-month timeframe for reduced land application rates to preserve flexibility and availability of alternative biosolids management measures. This is critical for the following reasons:
    - To provide the same time allowance for two alternative management measures that similarly reduce PFAS loading to land,
    - To mitigate the high risk of cutting off disposal options on viability, sustainability and cost of wastewater management,
    - To recognize that blending operations require utilities to make long-term commitments beyond two years to justify the capital investment made by private contractors,
    - To recognize that more time is required to implement and see PFAS source reductions from mitigation measures such as industrial pretreatment,
    - To recognize that more time is required to implement and see PFAS source reductions from product sale phaseouts, of which many are effective only in 2028 and 2029,
    - To recognize that facility upgrades are the most costly approach to PFAS reductions, thus more time is needed to judge the effectiveness of industrial pretreatment reduction before making these large financial commitments,
    - To recognize that if industrial pretreatment alone are still not adequate to bring our PFAS levels below 25 ppb, system-scale PFAS removal technologies require a minimum of 5-7 years to plan, permit, design and build, that such large-scale solutions are currently still in the research and development stage, and that these solutions are the most costly approach to PFAS reductions.
- Introduce a deadline to complete a source tracking plan, to demonstrate our commitment to sustainable and cost-effective PFAS reductions.

- Extend the 2-year mitigation plan implementation deadline for industrial pretreatment implementation and system-scale capital upgrades to account for time required by generators to plan, permit, design and build system-scale treatment solutions.
- Provide for MDE to grant time extensions on alternative management measures and mitigation plan implementation. This is critical because reduction of PFAS sources into wastewater is not entirely in the utility's control and could require more time than currently allowed to mitigate, for example, industrial substitution or pretreatment implementation, stream contamination cleanup, funding and rehabilitation of sewers in environmentally sensitive areas, or readiness and funding of system-scale PFAS removal technologies. While it could require more time, permanent source mitigation is still superior to quick and expensive wastewater treatment solutions that do not ultimately reduce PFAS in the environment.
- Clarify applicability of the bill's requirements to land application outside of Maryland.

In addition, we suggest several amendments related to specific requirements in proposed bill:

- Ensure analytical method feasibility and quality by deferring analytical method requirements to MDE. An examination of WSSC Water's past results showed that one of the nation's most advanced PFAS analytical laboratories could not reliably meet the 2 ppb level of quantification for biosolids samples.
- Provide for reduced monitoring in assessing compliance after a period of demonstrating levels below 25 ppb to reduce unnecessary indefinite sampling costs.
- Shorten the initial monitoring period for blending operations. It is not feasible to expect blending operations to gather one year of data for an annual average before blended products can be land applied.
- Provide clarity on who may blend, who conducts monitoring in blending, and on the ability to blend with non-biosolids materials.
- Revise the maximum reduced land application rate to 3 dry tons per acre. The current 3 dry metrics tons per hectare is not feasible.
- Clarify requirements on MDE's consultation with landowners in the vicinity of drinking water wells so that the process will not result in intolerable delays and risk disruption of continuous biosolids operations.

In closing, supporting this legislation, with amendments for realistic and feasible implementation, is an opportunity to model how Maryland is prioritizing source control as a cost-effective and sustainable model for PFAS reduction in our environment. WSSC Water appreciates this opportunity to provide testimony on SB719. We continue to advocate for the protection of public health and the environment by stopping PFAS at the source as we seek to manage biosolids responsibly and balance affordability for our ratepayers. If you have any questions, please do not hesitate to contact me at 301-206-8028 or Priscilla.To@wsscwater.com.

Sincerely,

DocuSigned by:
Priscilla To
B3225BC6990E4E8...

Priscilla To, PhD, PE
Director, Operational Reliability and Resilience

SB719-MML-Testimony.pdf
Uploaded by: Tyler Brice
Position: FWA

TESTIMONY

COMMITTEE:	Senate Education, Energy, and the Environment	**DATE:**	February 24, 2026
POSITION:	Favorable	**BILL:**	SB 719

On behalf of the Maryland Municipal League (MML), representing Maryland's municipalities and cities, I submit this testimony in strong support of Senate Bill 719, with an important request that funding assistance be included to address the serious challenges that lie ahead for our local governments.

Our communities have long been dedicated partners in advancing environmental stewardship and public health. Over recent years, PFAS, per- and polyfluoroalkyl substances, often dubbed "forever chemicals," have emerged as a profound threat, not just to our natural resources, but to the livelihoods and wellbeing of Marylanders statewide. SB 719 makes critical advances by establishing clear, science-based standards for monitoring, reporting, and limiting PFAS in sewage sludge intended for land application. For us in municipal government, this legislation is not abstract policy, but a daily, real-world reality that involves both triumphs and ongoing tribulations.

Municipalities across Maryland have navigated a landscape that is often marked by uncertainty and flux when it comes to the management of biosolids and protection from emerging contaminants like PFAS. We have invested considerably in upgrading wastewater treatment systems and have actively participated in state and federal initiatives to ensure our practices protect human health and the environment. Yet, municipalities have too often found themselves caught in a tug-of-war, between evolving regulatory expectations and the persistent lack of state and federal funding for needed infrastructure improvements and technical expertise.

The unique and far-reaching requirements established by SB 719, quarterly or even monthly PFAS monitoring, source tracking studies, mitigation plans, and the potential for costly treatment upgrades, are necessary responses to a severe environmental challenge. However, these mandates are also resource-intensive. Local governments, especially smaller municipalities, may not have the in-house technical staff or financial reserves to quickly comply with new testing protocols, implement comprehensive tracking, or design mitigation infrastructure to lower PFAS concentrations below the designated thresholds of 25 or 50 parts per billion.

We speak from experience when we say that municipal utility staff and leadership have engaged in repeated, sometimes arduous conversations with state agencies, technical consultants, and our own residents. Many communities have felt the frustration of being held accountable for PFAS pollution that originates with

industrial sources outside of the municipality's direct control. Our efforts to collaborate with industries, conduct community outreach, and pursue innovative treatment solutions are genuine. However, the financial and technical burden has in many cases been shifted disproportionately to municipalities, entities that are often least responsible for the original introduction of these chemicals.

Despite these challenges, Maryland's municipalities have shown resilience, adaptability, and a willingness to go above and beyond regulatory baselines. The process of moving forward has been anything but easy, one marked by trials, retrials, and, yes, frustration with the slow pace of technological development and the mounting costs of compliance. Still, we continue to work proactively, because we share with the General Assembly a commitment to protect Maryland's land, water, and people.

Therefore, as strong supporters of SB 719, the Maryland Municipal League urges the committee to pair these requirements with robust, accessible funding assistance and technical support for municipalities. A commitment of this nature is not only essential for compliance, but for fairness and effectiveness. As SB 719 acknowledges, even the best-intentioned and most diligent municipal operators cannot achieve what is required without partnership and resources. Supporting our local governments in this transition will help ensure that the law's promise is met in practice: safeguarding public health, maintaining agricultural productivity, and upholding the environmental legacy we leave to future generations.

We thank you for your vision, diligence, and partnership on this important environmental priority, and urge a favorable report on SB 719, with amendments to provide critically needed funding and technical assistance to Maryland's municipalities.

For more information relating to this piece of testimony, please contact:

Tyler Brice: Manager, Advocacy and Public Policy, tylerb@mdmunicipal.org

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Uploaded by: Laura Dumais
Position: UNF

PUBLIC EMPLOYEES FOR ENVIRONMENTAL RESPONSIBILITY
962 Wayne Ave • Suite 610 • Silver Spring, MD 20910

February 20, 2026

Chair Brian J. Feldman
Education, Energy, and the Environment Committee
Maryland General Assembly
2 West Miller Senate Office Building
Annapolis, Maryland 21401

RE: Testimony in Opposition to SB 719: Sewage Sludge - Per- and Polyfluoroalkyl Substances – Regulation

Dear Chair Feldman, Vice Chair Kagan, and Members of the Maryland Senate Education, Energy, and Environment Committee:

Public Employees for Environmental Responsibility (PEER) opposes SB 719, which threatens the health and safety of Marylanders by allowing the land application of sewage sludge containing undeniably dangerous levels of per- and polyfluoroalkyl substances (PFAS).

PEER is a nonprofit headquartered in Silver Spring serving public employees who want their agencies to follow the laws that protect our environment, resources, and public health. Over the past decade, our Science Policy Director (former EPA Region 1 Wetlands Enforcement Coordinator Dr. Kyla Bennett) and our legal team have been heavily engaged in PFAS issues, including risks from PFAS in pesticides, artificial turf, plastic containers, and sewage sludge.

We currently represent several ranchers in Texas who have suffered – and continue to suffer – truly heartbreaking consequences after a neighbor land applied sewage sludge, resulting in exceedingly high levels of PFAS on their farms and in the tissues of the many animals that began to die following the sludge spreading. (When PEER tested a sample of biosolids made by the company that supplied those spread on the neighboring land, the concentrations for PFOS and PFOA were *far lower* than the 50 ppb that Maryland's SB 719 would allow.) In 2024, on behalf

of these ranchers, the conservative rural Texas county in which they live, and two nonprofits, PEER sued EPA for its failure to regulate PFAS in biosolids.

PEER signed on to the public comments of nonprofit Just Zero, and will not here repeat the crucial information regarding the presence of toxic substances in sewage sludge, or the extreme dangers of PFAS in particular, including their persistence in the human body and the environment and their effectively permanent contamination of land where they are spread. Rather, we write to expand upon Just Zero's comments with the following points:

I. Maryland needs to protect its residents from sludge because the United States Environmental Protection Agency <u>is not doing so</u>.

EPA has all but abandoned its oversight of toxic substances in sewage sludge. In the 1980s, when the United States banned the then-primary method of disposing of sewage sludge (ocean dumping) in favor of other disposal methods including land application, Congress required EPA to identify hazards in sewage sludge and regulate them so that land-applied sludge (which EPA later began calling "biosolids") would not poison us.[1] Aware that neither scientific understanding nor the invention of new substances and technologies would remain frozen in the 1980s, Congress additionally required EPA to reexamine the regulations every two years for the purpose of identifying and regulating any additional toxic pollutants.[2]

It is a common misconception that biosolids must be safe because surely EPA stays on top of that issue. It emphatically **<u>does not</u>**. While EPA (belatedly) regulated pathogens and a handful of heavy metals in land-applied sludge in 1993,[3] it has never regulated a single substance since. This is despite the vast number of new chemicals and pharmaceuticals that have since entered wastewater streams, and despite a well-established and ever-growing body of scientific evidence showing the health risks of PFAS, the "forever" nature of these chemicals, and the high levels of PFAS in biosolids and in the soil, water, crops, and animals that biosolids impact.

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[1] This was through an amendment to the Clean Water Act codified at 33 U.S.C. § 1345(d)(2). Specifically, Congress established dates for two initial rounds of identifying and regulating toxic substances meeting certain criteria, *id*., § 1345(d)(2)(A) and (B).

[2] *Id*. § 1345(d)(2)(C). The regulations under subsections (A), (B) and (C) all must "be adequate to protect public health and the environment from any reasonably anticipated adverse effects of each pollutant." *Id.*, § 1345(d)(2)(D).

[3] 58 FR 9248 (Feb. 19, 1993) (40 CFR part 503, for eleven heavy metals and total hydrocarbons)

Crucially, EPA's failure to identify any new substances for regulation is **not** because its biennial reviews were unsuccessful in locating any additional substance in sludge that meets the statutory criteria requiring regulation. Rather, it is because EPA views its biennial review duty as simply to keep a running list of substances in sewage sludge which, if someday EPA gets around to prioritizing,[4] could be helpful in deciding what to regulate. In its most recent "biennial" report from 2022 ("biennial" in quotation marks, as we are now in 2026 and EPA has produced nothing further), EPA claims to be still "developing a prioritization and risk screening process to evaluate pollutants found in biosolids."[5] Imagine a doctor stating, at a patient's annual physical, "I've reviewed your health information. Someday I might use it to identify any issues that need to be fixed, but I'm not doing that now. See you next year, when I'll review your information again." This is the approach EPA has taken over the last almost 40 years since Congress added the biennial review provision to the Clean Water Act.

In short, states are currently on their own in terms of protecting residents from hazards in sewage sludge. This makes Maryland's approach to regulation of critical importance.

II. Limits must protect public health and the environment, not the wastewater industry's bottom line.

Constituents deserve regulations that reflect **not** what is convenient for the wastewater sector, or what it claims is "feasible." Leaving nuclear waste in piles on the ground would be far cheaper and more feasible for that industry, too, but we nonetheless require safe disposal that protects public safety, despite higher costs – particularly because nuclear waste (like PFAS) persists for incredibly long periods of time and (like PFAS) poses significant risks to public health.

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[4] In 2018, EPA's Office of the Inspector General issued a report identifying major problems with the biennial review process and finding that "EPA has chosen to deprioritize the biosolids program and staff over time." EPA OIG Report No. 19-P-0002 at 12 (Nov. 15, 2018), available at chrome- extension://efaidnbmnnnibpcajpcglclefindmkaj/https://www.epa.gov /sites/default/files/2018-11/documents/_epaoig_20181115-19-p-0002.pdf. This deprioritization makes it unlikely that EPA will take appropriate action on biosolids in the near future.

[5] Biosolids Biennial Report Number 9 at 1, available at https://www.epa.gov/biosolids/biennial-reviews-sewage-sludge-standards.

SB 719 allows the application of sludge containing **50 ppb of PFOS and PFOA**, even though EPA's 2025 Draft Risk Assessment finds unacceptable risks to farmers of these substances at a level of just **1 ppb** in biosolids, as explained more fully in Just Zero's testimony on this bill. A limit **50 times higher** than what EPA has already found is dangerous betrays Marylanders, especially farmers and rural communities. Notably, EPA's Draft Risk Assessment likely grossly understates the risks, as EPA based its modeling for land applications on a very narrow set of assumptions bordering on the absurd; for example, that farming families stay on the property for less than ten years and that their **sole** source of exposure is one single PFAS-containing product, like eggs (i.e., no additional exposure through other on-site factors likely to be contaminated by sludge spreading like well water, dust from soil, other plants and animal products they consume, etc.).[6]

PEER also urges the Maryland legislature to consider this issue in the context of EPA's municipal drinking water standards, which found that, as for substances like uranium and arsenic, there is **no safe level** of two of the most well-studied of the thousands of PFAS (PFOS and PFOA) in drinking water.[7] Land application of sewage sludge at the high levels allowed by this legislation would likely result in well water and surface water drinking sources exceeding the four parts per *trillion* maximum contaminant levels established by EPA for PFOS and PFOA in municipal drinking water.[8] Your constituents' exposure to PFAS should not depend on whether they get city water or well water.

III. The bill contains no mechanism to alert farmers and adjacent landowners to the presence of PFAS in sludge before spreading occurs.

Finally, this bill contains no advance notice to farmers or adjacent landowners regarding the levels of PFAS present in sludge before that sludge is spread on land. Marylanders deserve to know in advance when a permanent hazard is threatening their property and wellbeing so they can make informed decisions. This has been

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[6] For more details, see PEER's press release, with links to PEER's comments on the Draft Risk Assessment, available at https://peer.org/epa-attempts-to-sugarcoat-toxic-sewage-sludge/

[7] Final maximum contaminant level goal (MCLG) for PFOS and PFOA. *See* https://www.epa.gov/sdwa/and-polyfluoroalkyl-substances-pfas.

[8] Criswell, Rachel, et al., *Concentrations of per- and polyfluoroalkyl substances (PFAS) in private well drinking water and serum of individuals exposed to PFAS through biosolids: The Maine Biosolids Study*, Environmental Pollution, Vol. 386, 1 Dec. 2025, available at: https://www.sciencedirect.com/science/article/pii/S0269749125016331

an important feature in proposed biosolids legislation in other states, and should be present in any Maryland legislation as well.

Conclusion

As PEER is both headquartered in Maryland and is a leader on the topic of PFAS risks and regulations, we hope our testimony will be both valued and useful. We appreciate Maryland's leadership in banning PFAS in firefighting foam, food packaging, carpets, and rugs, because the less these substances are present in our products, the less they will be present in our wastewater. However, such regulations are not enough.

Protecting our farmland and home gardens from permanent contamination by forever chemicals is incredibly important, and with its extremely high allowable levels, SB 719 simply does not accomplish this goal. Allowing these levels to stand would betray Maryland residents, particularly Maryland's farming families and rural communities. We urge you to amend the legislation to include science-based limits that protect Marylanders' health and safety.

Thank you for your time and consideration of this testimony. If you have any questions, please reach out to me at ldumais@peer.org.

Respectfully submitted,

Laura Dumais, Esq.
Staff Counsel
Public Employees for Environmental Responsibility

2026.02.20 - Just Zero Testimony Opposing SB0719.p

Uploaded by: Peter Blair

Position: UNF

February 20, 2026

Chair Brian J. Feldman
Education, Energy, and the Environment Committee
Maryland General Assembly
2 West Miller Senate Office Building
Annapolis, Maryland 21401

RE: Testimony in Opposition to SB 719: Sewage Sludge - Per- and Polyfluoroalkyl Substances - Regulation

Dear Chair Feldman, Vice Chair Kagan, and Members of the Maryland Senate Education, Energy, and Environment Committee:

Thank you for the opportunity to provide testimony on SB 719. Just Zero opposes this bill and urges the committee to submit an unfavorable report on the bill. While we appreciate the legislature's recognition that PFAS contamination in sewage sludge is a serious and urgent problem, this bill ultimately sets standards that are not protective of public health or the environment. By establishing thresholds that still allow PFAS-contaminated sludge to be spread on land, the bill risks creating a false sense of safety and progress while perpetuating the very harms it seeks to address.

Just Zero is a national environmental nonprofit advocacy organization that works in partnership with communities, policymakers, scientists, educators, and organizers to advance just and equitable solutions to climate-damaging and toxic production, consumption, and waste systems. We believe all people deserve Zero Waste solutions that deliver zero climate-damaging emissions and zero toxic exposures, while strengthening local economies and public health.

Just Zero is also a founding member of the Coalition for Sludge Free Land which is a national alliance of organizations working to prevent the contamination of soil, water, and food and the destruction of livelihoods caused by the land application of sewage sludge[1] and sludge-derived products. The Coalition's mission is to stop the spreading of sewage sludge on farms, fields, gardens, and other land and to advocate for responsible containment and reduction of this toxic by-product of wastewater treatment.

[1] Sewage sludge is sometimes interchangeably called "sludge" and "biosolids." For this testimony, we will be using the term "sewage sludge" and "sludge."

This testimony is submitted on behalf of Just Zero and the undersigned members of the Coalition for Sludge Free Land.

I. Sewage Sludge is a Noxious By-Product of Wastewater Treatment

Sewage sludge is marketed as beneficial and cheap "fertilizer" but understanding how sludge is made demonstrates how it should never be land applied. The process first starts with all the waste that goes into the sewer. This includes industrial waste, hospital waste, commercial waste, landfill leachate, human waste, storm water runoff, and every other kind of waste that goes down the drain. This material is then sent to a wastewater treatment facility (WWTF) where it is treated to meet water quality standards. The treated water is then discharged into rivers, lakes, and oceans. What remains is a noxious by-product referred to as sewage sludge—a mud-like material containing hundreds of known toxic contaminants. This includes heavy metals, microplastics, and synthetic chemicals such as per- and polyfluoroalkyl substances (PFAS).[2] WWTFs are not designed or equipped to remove or destroy these compounds. Any policy that allows land application of sludge containing PFAS effectively transfers contamination from wastewater systems into soil, groundwater, and food chains.

II. Land Applying Sewage Sludge Contaminates Food, Soil, and Water with PFAS—Harming Public Health and the Environment

PFAS are a group of approximately 15,000 synthetic chemicals and used in textiles, packaging, automotive, aerospace, firefighting, and electronics because of performance qualities that include heat, water, and stain resistance.[3] They are often called "forever chemicals" because their chemical structure is one of the strongest in organic chemistry and do not break down in the environment.

PFAS compounds are known to be toxic to humans in concentrations as low as single-digits parts per trillion (ppt).[4] These chemicals are associated with growth, learning, and behavioral problems in infants and children; fertility and pregnancy problems; interference with natural human hormones; increased cholesterol; immune system disruption; and, interference with liver, thyroid, and pancreatic function.[5] The U.S. Environmental Protection Agency (EPA) now designates two common and highly toxic PFAS compounds found in sewage sludge—perfluorooctanoic acid (PFOA) and perfluorooctane sulfonate (PFOS)—as hazardous substances.[6]

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[2] Jochen Heidler & Rolf Halden, *Meta-analysis of mass balances examining chemical fate during wastewater treatment*, 42 Environ. Sci & Technol. 6324 (2008).
[3] U.S. Env't Prot. Agency (EPA), CompTox Chemicals Dashboard (last updated Oct. 24, 2025).
[4] U.S. Agency for Toxic Substances and Disease Registry (ATSDR), Toxicological Profile For Perfluoroalkyls, U.S. Dep't of Health & Human Serv., 5–6 (May 2021).
[5] *Id.*
[6] 40 C.F.R. § 302; EPA, Designation of Perfluorooctanoic Acid (PFOA) and Perfluorooctanesulfonic Acid (PFOS) as CERCLA Hazardous Substances, (May 8, 2024).

Spreading sewage sludge on land provides a direct route for PFAS to contaminate food, soil, and water.[7] A recent EPA study determined that land applying sewage sludge with just 1 part per billion (ppb) of PFOA or PFOS can increase cancer risks and other health hazards by at least 1,000 times the acceptable limits.[8] Once spread, PFAS can then remain in soil for years, increasing PFAS concentration with multiple applications.[9]

Against scientific consensus, SB 719 allows the land application of sludge containing PFAS concentrations just below 50 ppb. This limit is arbitrary and not based on established research indicating that there are no safe levels of PFAS exposure. While SB 719 requires additional monitoring and mitigation planning for sludge with PFAS concentrations of 25 to under 50 ppb, it does not stop sludge with these levels from being land applied. This is just acknowledging the risk without stopping it. We support efforts to track and minimize PFAS from entering the wastewater treatment system but prohibiting the use of sludge as a fertilizer is critical to stemming public PFAS exposure.

PFAS from land application of sewage sludge can also migrate as far as 17 meters to underlying groundwater.[10] Recognizing the serious risks of PFAS exposure through drinking water, the EPA set enforceable drinking water limits for PFOA and PFOS at 4 ppt.[11] The agency went a step further setting a maximum contamination level goal of zero for both compounds.[12] By permitting land application of sludge with such high PFAS levels, SB 719 is allowing further PFAS contamination in Maryland's water that may reach levels higher than the federal limits.

III. Blending Sewage Sludge Does Not Reduce Risk, It Spreads It

PFAS concentrates within sewage sludge at extremely high levels.[13] A 2025 Massachusetts report showed that every sludge sample taken at 114 WWTFs in the state had high concentrations of PFAS, ranging from thousands to millions parts per trillion (ppt).[14] SB 719 perversely recognizes this tendency for sludge to have high concentrations of PFAS, by temporarily allowing sludge to be blended with other material with the aim of reducing PFAS concentration so that it can be spread on farmland as a fertilizer. However, this tactic does not

[7] Ali Behnami et al., *Biosolids, an important route for transporting poly- and perfluoroalkyl substances from wastewater treatment plants into the environment: A systematic review*, 925 Sci. of the Total Env't 171559 (2024).
[8] 90 Fed. Reg. 3864 (Jan. 15, 2025); EPA, EPA-820P25001, Draft Sewage Sludge Risk Assessment for Perfluorooctanoic Acid (PFOA) CASRN 335-67-1 and Perfluorooctane Sulfonic Acid (PFOS) CASRN 1763-23-1 (2025).
[9] Arjun Venkatesan & Rolf Halden, *Loss and in situ production of perfluoroalkyl chemicals in outdoor biosolids–soil mesocosms*, 132 Env't Res. 321 (2014).
[10] Gwynn Johnson, *PFAS in soil and groundwater following historical land application of biosolids*, 211 Water Res. 118035 (2022).
[11] 40 CFR § 141.
[12] *Id.*
[13] Heidler & Halden, *supra* note 2.
[14] Mass. Dept. of Environmental Protection (MassDEP), *Data Analysis Report: PFAS Testing Study for NPDES POTWs (PRF-77)*, (2025).

remove PFAS, it simply contaminates whatever material is used to blend with sludge thereby increasing the volume of toxic material that must then be managed.

Furthermore, contamination in sludge extends beyond PFAS to other harmful. Like PFAS, pharmaceuticals, industrial chemicals, and other hormone disrupting compounds in sludge also resist degradation and accumulate in the environment after being applied to land. SB 719 does not acknowledge the other contaminants in sludge, and with such a high threshold for PFAS contamination one can be sure that other contaminants harmful to human health will also be spread.

IV. SB 719 Conflicts with Maryland's Leadership on PFAS

Maryland has been a leader in the last few years in acknowledging that PFAS is a threat to public health. In the landmark George "Walter" Taylor Act, Maryland banned PFAS in firefighting foam, food packaging, carpets, and rugs. George "Walter" Taylor, was a Maryland firefighter for over three decades who passed away from cancer related to PFAS exposure through his job.[15] This law recognizes that PFAS pose unacceptable risks to our bodies and should not be in our homes or near the food we eat. Building on this progress, the legislature is currently considering a bill that would ban PFAS in a broader range of consumer products, including cosmetics, cookware, cleaning products, textiles, and paint.[16]

SB 719 stands in direct tension with these efforts. While the state is moving to eliminate PFAS from everyday products because of the risks they pose, this bill would continue to allow PFAS-contaminated sludge to be spread on land where food is grown, livestock graze, and groundwater can be affected. This creates an inconsistent and scientifically unjustifiable policy framework: PFAS are treated as too dangerous to allow household goods, yet acceptable to spread across agricultural land. This contradictory framework moves Maryland backward in the goal of PFAS reduction and exposes rural communities and farmers to bear the brunt of PFAS contamination from sewage sludge.

V. Conclusion

SB 719 correctly seeks to restrict the land application of sewage sludge but wrongly establishes parameters that will, in effect, continue the practice of spreading PFAS-contaminated sludge on land and perpetuate the significant public health threat this practice poses. This bill is not protective of Maryland farmers, food, soil, water, and health. The legislature has been leaders in reducing Maryland's PFAS exposure. This bill is not an example of that leadership. We urge the committee to submit an unfavorable report on the bill and instead end the land application of PFAS contaminated sludge.

[15] Elizabeth Shewe, *Inspired by the Death of a Veteran Firefighter, Bill Would Limit Exposure to Toxic Chemical in Fire Foam and Gear*, Maryland Matters (Feb. 10, 2022).
[16] Maryland General Assembly, 449th Legislative Session, House Bill 1022 and Senate Bill 868

Thank you for your time and consideration of this testimony. If you have any questions, please reach out to me at pblair@just-zero.org.

Respectfully submitted,

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Center for Environmental Health

Clean Air Action Network of Glens Falls (NY)

Move Past Plastic (MPP)

Public Employees for Environmental Responsibility (PEER)

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MARYLAND'S Coast
WORCESTER COUNTY

Senate Bill 719

Sewage Sludge – Per – and Polyfluoroalkyl Substances - Regulation

Position: **OPPOSE**

To: Education, Energy and Environment Committee

Date: February 20, 2026

From: County Commissioners of Worcester County

Worcester County opposes Senate Bill 719 in its present form as it is in need of amendments in several areas. It needs to be workable and executable with the present infrastructure of the state's wastewater plants and their contractors in a timetable that is achievable. It also needs to be affordable. Not all utilities in the state are of a size where costs can continually be rolled upon the consumers. For smaller utility districts, we have affordability concerns as the baseline of cost impacts for this change will be very impactful to their overall bill.

As a member of the Maryland Association of Municipal Wastewater Agencies (MAMWA), we understand that agencies across the state are monitoring this legislation and have differing levels of exposure to law changes with respect to this bill. We do support the overall theme that the bill must be fiscally reasonable for the state's wastewater agencies as we are passive receivers and not generators of these PFAS compounds in our plant sludges. From additional storage costs to land application restrictions, the bill's requirements create financial impacts to our service areas and their ratepayers. We cannot put unreasonable costs onto our water and sewer customers when they are simultaneously facing inflationary increases in other areas. Thank you.