



House Environment and Transportation Committee

March 13, 2026

House Bill 1268 – *Environmental Permits – Requirements for Burden Analysis, Issuance and Renewal, and Public Participation (Cumulative Harms for Environmental Restoration for Improving Shared Health – CHERISH Our Communities Act)*

POSITION: OPPOSE

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 its strong **opposition** for House Bill 1268.

While Synagro opposes the bill as drafted, we appreciate the opportunity to comment and request consideration of amendments to ensure that essential public services can be maintained without disruption or unintended consequences. Synagro works with municipalities across Maryland and the United States to manage biosolids and wastewater residuals generated from publicly owned treatment works. These services are performed under contract with local governments to support the essential public function of wastewater treatment and environmental protection.

Wastewater treatment is a critical public health service. Every day, local utilities must safely treat sewage generated by homes, businesses, hospitals, and public institutions. The treatment process produces residual materials commonly referred to as sewage sludge or biosolids. Proper handling, storage, transport, and beneficial reuse or disposal of these materials are necessary and unavoidable components of operating wastewater infrastructure.

In many jurisdictions, including throughout Maryland, local governments contract with private operators to perform these functions on their behalf. Companies, such as Synagro, operate facilities, storage infrastructure, and treatment processes under permits issued by the Maryland Department of the Environment (MDE) and in accordance with federal and state environmental standards. Although these services may be delivered by private entities, they are fundamentally part of the public wastewater treatment system and are carried out on behalf of local governments and ratepayers.

Because of this relationship, activities, such as the storage, treatment, and processing of sewage sludge and biosolids, should be recognized as essential public services that support wastewater utilities and public health. These activities are not discretionary industrial operations but integral components of municipal sanitation infrastructure.

House Bill 1268 proposes new requirements for certain environmental and public health burden analyses associated with facility approvals. While Synagro understands and respects the intent to ensure a thoughtful evaluation of impacts on communities, the bill, as written, could

unintentionally include facilities that provide essential wastewater services under government contracts. This could create uncertainty or delays in the infrastructure necessary for the continuous operation of wastewater treatment plants. Importantly, wastewater utilities must maintain uninterrupted capacity to manage biosolids generated by treatment plants. Interruptions in the ability to renew permits, maintain storage capacity, or operate processing facilities could have significant consequences for municipal wastewater systems and the communities they serve.

For this reason, Synagro respectfully requests that the Committee consider an amendment clarifying that **essential public services performed on behalf of a state or local government are not subject to the bill's requirements**, particularly where those activities involve the **renewal of existing permits for facilities that support municipal wastewater treatment systems**. Such an amendment would ensure that the legislation does not inadvertently affect the reliable operation of wastewater infrastructure while preserving the bill's broader policy goals. This clarification would also recognize the long-standing public-private partnership model used by many Maryland jurisdictions to efficiently and safely provide wastewater and biosolids management services.

Maryland's wastewater utilities depend on a network of permitted facilities and service providers to manage biosolids responsibly and in compliance with environmental regulations. Maintaining regulatory certainty for these essential services is critical to protecting public health, safeguarding water quality, and ensuring the continuous operation of wastewater treatment systems. Synagro appreciates the Committee's consideration of this request and respectfully urges the adoption of an amendment clarifying that essential public services performed on behalf of state or local governments are excluded from the bill's requirements, particularly with respect to permit renewals for existing facilities supporting municipal wastewater systems.

For more information call:

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