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HB0925

February 26, 2026

TO: Members of the Environment and Transportation Committee
FROM: Nina Themelis, Director of Mayor's Office of Government Relations
RE: House Bill 925 - Sewage Sludge – Per- and Polyfluoroalkyl Substances - Regulation

POSITION: SUPPORT WITH AMENDMENTS

Chair Korman, Vice Chair Guyton, and Members of the Committee, please be advised that the Baltimore City Administration (BCA) **supports** House Bill (HB) 925 **with amendments**.

HB 925 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. HB 925 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 HB 925 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 HB 1022. **While BCA supports the initiative, HB 925 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 HB 925'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 HB 925 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 HB 925 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 HB 925.

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