



House Environment and Transportation Committee

February 25, 2026

House Bill 925 – *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 House Bill 925.

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 elements, 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:

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