WASTEWATER
ADVISORY COMMITTEE
TO THE MASSACHUSETTS WATER
RESOURCES AUTHORITY

CHAIR NATALIE M. BLAIS
JOINT COMMITTEE ON AGRICULTURE AND FISHERIES
ATTN: JACOB KAMINSKY
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Via email
Re: H.109/S.56 and H.136 – on sludge and biosolids (and "forever chemicals")

Dear Chair Blais, Committee members:

The Wastewater Advisory Committee has been deeply engaged in learning about PFAS ("forever chemicals"), their properties and presence in everyday products as well as in water, effluent and sludge. We share the commitment to protecting environmental and human health and to better recycling and conservation of our land and water.

We oppose banning land application of biosolids in Massachusetts. This action would be ineffective in protecting public health, costly, and would increase the state's overall greenhouse gas emissions.

The following considerations and questions need answering before you proceed with these bills:

1. Where will biosolids go?
   MassDEP reports show that even **without** this ban, the state will soon face a growing shortage of disposal options, with no clear destination for over 11,800 tons (see graph below).

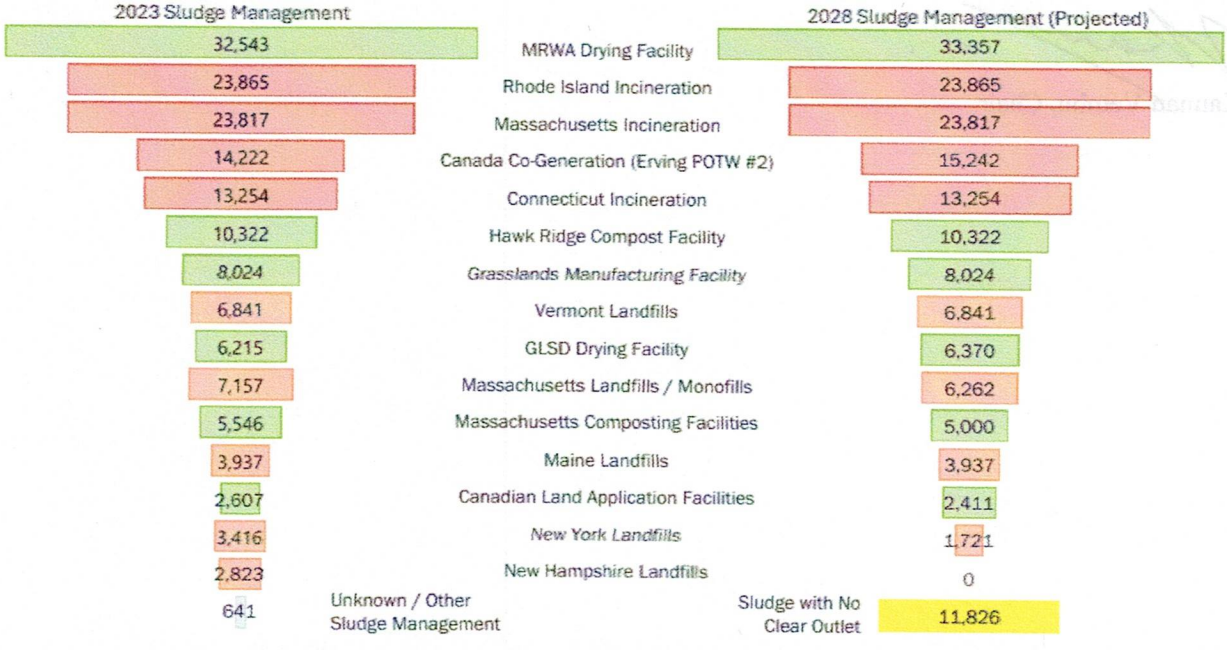

Figure 7-2. Massachusetts Sludge Management in 2023 and 2028 (Projected) by Processing or Disposal Facility Location
(Dry U.S. Tons. Red: incineration; green: land application; orange: landfills/monofills; gray: other)

2. Will the ban reduce human exposure to PFAS?
    - Incineration does not destroy most PFAS, and may well spread PFAS via stack emissions;
    - Landfills with organic matter create methane—they also produce liquid leachate, which is often high in PFAS.
3. How will the Commonwealth meet its climate goals after a ban?
    - Incineration has a much higher carbon footprint than land application
    - As more landfills and incinerators are closed, sludges must be trucked further away, adding transportation emissions.
4. How will farmers replace the lost nutrients from biosolids if this source is prohibited?
   Biosolids are a valuable source of nitrogen and phosphorus. Chemical fertilizers --unlike biosolids--leach nutrients into water, emit greenhouse gases (and often require ghg in their manufacture), result in soil compaction and can introduce heavy metals (sludges are tested for these)
5. What is the PFAS levels in other composts and fertilizers?
   Neither DEP nor EPA has studied alternative soil amendments, but before banning biosolids, it is important to ensure the alternatives are actually safer.

WAC urges you to consider the larger picture, and to work first on eliminating the sources of PFAS in our lives. Wastewater utilities are passive receivers of PFAS, not producers. End-of-pipe solutions like these bans are the least effective and most expensive options.

We all want to reduce PFAS exposure—but let's follow the data and find more effective ways to do so!

Sincerely,

Kannan Vembu, Chair