



28 September 2026

Tess Richman

Engineering and Science Division
Office of Water (Mail Code 4504-T)
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue NW
Washington, DC 20460

Submitted via the Federal eRulemaking Portal: www.regulations.gov

Re: Comments on EPA's Draft Guidance for Reducing Risk from Perfluorooctanoic Acid (PFOA) and Perfluorooctane Sulfonic Acid (PFOS) in Biosolids and Request for Feedback

Dear Ms. Richman:

The Wastewater Advisory Committee (WAC) to the Massachusetts Water Resources Authority (MWRA) appreciates the opportunity to provide comments to the U.S. Environmental Protection Agency (EPA) on its Draft Guidance for Reducing Risk from PFOA and PFOS in Biosolids and Request for Feedback. WAC is an all-volunteer committee formed to provide comment and direction to the MWRA Board of Directors on any issues related to wastewater, biosolids, and wastewater conveyance. WAC is also charged with educating the public about wastewater issues.

WAC submitted comments on EPA's draft Risk Assessment in March of 2025. This Draft Guidance is a positive step forward in the biosolids discussion. It reaffirms EPA's continued support for the land application of municipal biosolids, and clarifies the important role of residuals in recovering nutrients and offering landowners an affordable alternative to synthetic fertilizers.

But our concern about the draft Risk Assessment was justified. After its issuance, WAC noticed an uptick in public concern about PFAS in biosolids and an increase in proposals to restrict land application.

While EPA's Draft Guidance is a step forward, what remains missing, in our view, is proper context for both the Risk Assessment and Draft Guidance. Specifically:

- **Background levels of PFOA and PFOS** (and other PFAS)—these should be incorporated in the Risk Assessment so that the public is aware of how much or little 1ppb in biosolids represents against what is already in land and water.

*WAC is a citizens' advisory committee to the MWRA on wastewater issues. We provide an independent forum for discussion of these matters. Environmental improvement, safety, cost and technical issues are all considered when formulating our recommendations.*¹ | Page

- **Dilution factors:** MWRA recommends its fertilizer pellets be judiciously applied where nutrients are needed and be diluted by a factor of 200-500x, so that pellets with 13 parts per billion PFAS become about 26 parts per trillion.
- **Quality of the biosolids:** MWRA's pellets are Class A. As EPA knows, these are disinfected and treated before being dried and distributed. They are slow-release, and thus a higher-quality product than Class B.
- **Sources and levels of PFAS contamination**—MWRA carefully monitors and controls industrial discharges of pollutants through its Toxics Reduction and Control (TRAC) program. MWRA drinking water is regularly tested and to date its tests have come back as “not detected.” In other words, the PFAS are entering from industrial, commercial and residential sources. Many of the PFAS in the effluent coming to MWRA for treatment are in the residential and commercial streams. In addition, different wastewater treatment plants will receive effluent with different levels of contamination, and EPA should establish sensible land application concentration limits for biosolids.
- **Comparisons** of PFAS concentrations in manures, composts and artificial fertilizers vs. biosolids.

The Draft Risk Assessment outlines three known ways to manage wastewater residuals: landfilling, incineration, and land application (which accounts for nearly half of US output). Recycling nutrients back into soils is an ancient and sustainable method, and has the lowest carbon footprint and cost, while recovering precious plant nutrients phosphorus and nitrogen.

WAC is concerned that this assessment, released without the context we request above, will continue to be misinterpreted by the public. The result may be bans on land application or reluctance to use biosolids on private land, when as far as EPA risk assessments have indicated, landfilling and incineration may be as much or more harmful to human health and the environment.

Because such a high proportion of the roughly 164,000 dry U.S. tons of residuals generated in Massachusetts are land applied, Massachusetts DEP studied the availability of alternate management methods. They found that both landfill and incineration facilities in New England and nearby states are at- or near-capacity.

Recent testing of MWRA biosolids and effluent show that levels of PFOA, which has been banned in the U.S., are fairly low. Levels of PFOS, which still enters the U.S. from products made in other countries, remain higher. Other PFAS continue to be detected in MWRA biosolids.

Sample Type	PFOA	PFOS	PFAS6	PFAS 40
Units = ppb	Average	average	average	Average
DITP Biosolids	0.05	11.72	11.88	17.96
	Range	range	range	Range
	ND - 0.39	5.56 -16.1	5.56 -16.1	10.42 - 34.95

ppb: parts per billion; equivalent to micrograms per liter (ug/L) or micrograms per kilogram (ug/kg)

ND: nondetect = not detected above the laboratory's method detection limit

PFAS 6: the 6 PFAS compounds currently regulated by MassDEP's drinking water regulations; includes PFOA, PFOS, PFNA, PFHxS, PFHpA, PFDA

PFAS 40: The 40 PFAS compounds that are measured by EPA Method 1633

All samples analyzed using EPA Method 1633

These results confirm EPA's assertion that the most effective way to reduce PFAS exposure from biosolids is to reduce and, where appropriate, eliminate the further production and dissemination of PFAS.

To EPA's specific questions:

1. Are the recommendations for farmers and bulk land applicators of biosolids sufficient to provide clarity? WAC thinks not. Numerical concentration level and dilution guidance should be generated based on the best available science.
2. Are the recommendations related to surface disposal and incineration of sewage sludge sufficient to provide clarity? No. EPA should also research or sponsor research on air-deposited PFAS from incineration and provide guidance based on those findings.
3. What other information should EPA consider to provide greater clarity on ways to protect public health and prevent PFAS? We have included recommendations on protection of public health and pollution prevention above, but we think EPA could provide greater clarity in its guidance.
4. Industrial source reduction of PFAS may be helpful, but the data from MWRA and other testing shows that commercial and residential flows are now the more concentrated sources in effluent. Therefore, while WAC supports industrial source reduction, utilities will need tools from EPA to reduce these other flows. EPA should include public education and consumer product-focused strategies as part of any effective risk reduction approach. Household use of PFAS-containing products is part of the broader PFAS loading picture. WAC urges EPA to recognize domestic sources and recommend consumer and household education as part of a holistic framework
5. As for practices that are not included in the draft guidance that can reduce risk when land applying biosolids: See MWRA's dilution recommendations above.

6. Practices not included in the draft guidance that can reduce risk when surface disposing or incinerating sewage sludge: WAC believes that EPA needs more information about stack emissions of PFAS before it moves forward with guidance on incineration of PFAS-contaminated residuals.
7. Next steps for EPA: EPA Should Revisit the Draft Risk Assessment and Underlying Framework

WAC feels EPA should not finalize the Draft Risk Assessment without significant revision. EPA should also revisit the underlying Biosolids Screening Tool and risk framework to ensure it reflects the unique characteristics of biosolids, incorporates chemical fate and transport, uses a more realistic exposure framework, and avoids compound conservatism.

At a minimum, EPA should consider a more probabilistic risk assessment approach, revise farm family assumptions to reflect present-day agricultural practices, and incorporate empirical data regarding PFAS occurrence, fate, transport, and uptake in real-world conditions.

WAC urges EPA to focus its regulatory power on ways to reduce and eliminate PFAS production. WAC also urges EPA to ensure that any final guidance is grounded in sound science, reflects real-world biosolids management practices, recognizes utilities as passive receivers of PFAS, and preserves protective and sustainable biosolids management options for communities nationwide.

Again, thank you for your attention to our comments and requests.



Dan Winograd, Chair

Wastewater Advisory Committee to the MWRA