



JANET T. MILLS
GOVERNOR

STATE OF MAINE
DEPARTMENT OF ENVIRONMENTAL PROTECTION



MELANIE LOYZIM
COMMISSIONER

To: Generators of Wastewater Treatment Plant Sludge
From: Carla J. Hopkins, Director, Division of Materials Management *CH*
Date: August 27, 2026
Re: PFAS Analytical Requirements for WWTP Sludge Generators (P.L. 2025 ch. 651, **An Act to Improve the Management of Landfill Leachate and Wastewater Treatment Plant Sludge at Solid Waste Landfills**)

On April 13, 2026, P.L. 2025, ch. 651, *An Act to Improve the Management of Landfill Leachate and Wastewater Treatment Plant Sludge at Solid Waste Landfills* ("L.D. 2070") became effective. Section 4 of this law requires that, "A solid waste facility licensed under this chapter may not process, beneficially reuse or dispose of sludge at that facility unless the sludge has been characterized by the entity that generated the sludge in accordance with a plan approved by the department, which must include sampling and analysis of the sludge for perfluoroalkyl and polyfluoroalkyl substances." The full text of P.L. 2025, ch. 651 is attached for your reference.

As you've been identified as a potential generator of wastewater treatment plant sludge, you must sample and analyze your sludge for per- and polyfluoroalkyl substances ("PFAS") prior to sending your sludge for disposal or processing in Maine. This must be done in accordance with a Sampling and Analytical Work Plan ("SAWP") approved by the receiving facility (i.e., landfills or processing facilities located in Maine). Guidance documents for developing a SAWP and collecting samples for PFAS analysis are attached. The Department will coordinate with receiving facilities to ensure the SAWP you are proposing will meet the Department's requirements for waste characterization pursuant to the *Solid Waste Management Rules: Water Quality Monitoring, Leachate Monitoring, and Waste Characterization*, 06-096 C.M.R. ch. 405. The Department will be requiring each receiving facility to update its waste characterization program to include both the initial and ongoing characterization of sludge for PFAS using U.S. EPA Method 1633, Revision A¹, or the most current revision. A list of Department-approved laboratories accredited in Maine to conduct PFAS analyses in solids using U.S. EPA Method 1633A is attached. The sampling and analysis must commence beginning no later than January 2027 and at a frequency approved by the receiving facility thereafter. As is current practice, all PFAS data collected pursuant to this requirement must be submitted to the receiving facility and the Department within 30 days of the date the

¹ Method 1633, Revision A, Analysis of Per- and Polyfluoroalkyl Substances (PFAS) in Aqueous, Solid, Biosolids, and Tissue Samples by LC-MS/MS, U.S. EPA, December 2024.

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laboratory analyses are reported, and prior to acceptance of sludge at the receiving facility. As you may already be aware, the Department requires all data to be submitted in the most current electronic data deliverable (“EDD”) format (Version 6.0) along with a .pdf version of the complete laboratory report including quality control and quality assurance information. Please submit the EDD and laboratory report to SludgeData.DEP@maine.gov. Guidance has been provided to sludge receiving facilities regarding these new requirements.

You may already have a SAWP that would meet the new requirements if you hold or previously held a Department-issued Agronomic Utilization Program License pursuant to the *Solid Waste Management Rules: Agronomic Utilization of Residuals*, 06-096 C.M.R. ch. 419. If you have any questions regarding the requirements, please contact Margaret Watson-Pierce at Margaret.Watson-Pierce@maine.gov or 207-242-0383.

Attachments: P.L. 2025, ch. 651
Guidance for Developing a PFAS SAWP (Development of a Sampling and Analysis Plan)
Guidance for PFAS Sampling (Per- and Polyfluoroalkyl Substances (PFAS) Sampling Considerations)
Maine DEP Pre-Qualified Laboratories for PFAS Analysis in Solids (EPA Method 1633A)