



JANET T. MILLS
GOVERNOR

STATE OF MAINE
DEPARTMENT OF ENVIRONMENTAL PROTECTION



MELANIE LOYZIM
COMMISSIONER

To: Solid Waste Facilities Accepting Wastewater Treatment Plant Sludge 
From: Carla J. Hopkins, Director, Division of Materials Management
Date: August 27, 2026
Re: PFAS Analytical Requirements for WWTP Sludge Receiving Facilities (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 receiver of wastewater treatment plant sludge for processing or disposal, you must update your waste characterization program to include both the initial and ongoing characterization of all sludge you accept, 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 for your reference. Additionally, you must ensure that generators of wastewater treatment plant sludge appropriately sample and analyze their sludge for per- and polyfluoroalkyl substances ("PFAS") prior to accepting it. This sampling and analysis must be done in accordance with a Sampling and Analytical Work Plan ("SAWP") approved by you as the receiving facility. The Department will coordinate with you to ensure the SAWPs being proposed 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. For your reference, we are attaching the guidance we provided to wastewater treatment plant sludge generators for developing a SAWP to sample and analyze for PFAS. The sampling and analysis must commence beginning no later than January 2027 and at a frequency approved by you as the receiving facility, in accordance with your Department-approved waste characterization

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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program, thereafter. Guidance has been provided to sludge generators regarding these new requirements. In your facility annual report, please include a list of all generators from which you accept wastewater treatment plant sludge as well as the quantity in tons received from each facility during the year.

If you have any questions regarding the requirements, please contact your Department solid waste project manager. If you do not know who your Department solid waste project manager is, please contact me at Carla.J.Hopkins@maine.gov or 207-446-4366.

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