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| **Subject:** | Comments on Managing PFAS in Maine |
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The Lewiston-Auburn Water Pollution Control Authority (LAWPCA) is the third largest waste water treatment plant in Maine. We were created by an act of the Maine Legislature in 1967 to provide wastewater treatment services to the Cities of Lewiston and Auburn and we began operations in 1974. On average, we treat 9 million gallons of effluent per day and in wet weather up to 32 million gallons per day. We are somewhat unique in that in 2013 we transitioned to anaerobic digestion of our wastewater solids; reducing the volume of our solids by over 50% and $CO_2$ (a greenhouse gas) by 80%. We do generate methane (another greenhouse gas), but we burn this in our electrical power plant. We have worked closely with local farmers, supplying them with free fertilizer through the beneficial reuse of our biosolids since 1987. We currently produce 120 tons biosolids per week. If all of this material were landfilled at current rates this could cost Lewiston and Auburn resident an additional $200,000 to 500,000 per year. LAWPCA is committed to cost effective community service, innovation and environmental stewardship. It is in the spirit of these values that we offer the following comments on the Draft Final Report of the Governors PFAS Taskforce, entitled Managing PFAS in Maine.

We applaud the Task Force's timely work on this complicated issue. We recognize that because of its rapid development, ever-changing base of knowledge, and lack of clear federal guidelines, each jurisdiction is struggling to address developing public concerns in a prudent and safe manner.

We have a few take-aways from the body of the report as it relates to our work:

- US production of these PFOS/PFOA compounds began to be phased out in the early 2000's. Imports continue to contain PFOS and PFOA compounds. This is a prime area for national action.
- The US Centers for Disease Control reported an 80% reduction in PFOS/PFOA compounds in blood serum in NHANES participants since 1999. PFOS/PFOA remain in the body for years so this reduction may lag behind reductions in exposure. Therefore, some additional average reduction in blood serum will likely be realized into the future based on past changes.
- Ingestion of food and consumption of contaminated drinking water appear to the dominant pathways for human exposure to PFAS compounds.
- The heath affects in humans are not well understood or documented and animals have exhibited multiple heath affects in high doses. This makes modeling and setting of realistic regulatory limits challenging.
- Only a limited number of public and private wells sampled to date have tested positive for PFAS compounds. Only two public water supplies have taken action due to the detection of PFAS compounds at or approaching advisory levels and private wells impacted all seem to be associated with discrete and unique sources, from past practices.
- With the exception of one dairy farm, with a unique and specific history of industrial sludge application, all milk tested in Maine has been below the detection limits for PFOA and PFOS. This includes those farms using feed from fields spread with a long history of biosolid applications.
- Continuing to manage and eliminate the introduction of PFAS compounds into our environment is key. It seems clear that the reduction in US production has significantly reduced exposure. Continuing to reduce the potential for exposure through regulating products containing these compounds should be our first and best line of defense.

Comments on the Waste Management Recommendations:

1. *"The State of Maine must take actions to prevent PFAS from entering Maine's environment, food supply, and drinking water. The Task Force supports legislation to amend Maine's Uncontrolled Sites law to include pollutants and contaminants, which would give the State authority to require the removal and treatment of PFAS when they are a danger to public health."*

   Maine and LAWPCA has a long and successful program of land application of biosolids for agricultural purposes. Adding PFAS compounds to the Uncontrolled Sites law will have a chilling effect on farmers desire to use these products as soil enhancements. Although we are not opposed to this addition, some clarity with what "danger to public health" means will be needed. This is especially true with the absence of clear heath affect data.

2. *"The Task Force recommends that DEP require regular testing of residuals for PFAS prior to land spreading or commercial distribution in Maine. The Task Force also recommends expanding existing requirements to include septage that is agronomically utilized or land applied. The Task Force supports legislation that would authorize the Board of Environmental Protection to update DEP's screening levels for individual PFAS and other constituents through routine technical rulemaking so those levels can be kept up to date.*
   *The Task Force also recommends the State continue efforts to sample for PFAS in prioritized locations, analyze sampling results for patterns, and refine models of PFAS fate and transport."*
   We support this recommendation, but again some further definition is needed. We support that Maine DEP work with regional industry leaders and associations such as the Maine Water and Environment Association and North East Biosolids and Residuals Association to develop a plan to perform an updated fate and transport model. This should be based on developing science and Maine's experience with biosolids application and food product testing. We further support Maine Water and Environment Association's recommendations to the PFAS Task Force of September 23, 2019.

3. *"Maine DEP should investigate the availability of treatment and disposal technologies that minimize the potential for environmental PFAS contamination. Preference should be given to technologies with the demonstrated capacity to safely destroy PFAS. Additionally, the State of Maine should promote the development of infrastructure, on the scale necessary to meet the needs of the State, to manage PFAS contaminated wastes safely and in a cost-effective manner"*
   This is a key recommendation. Currently Maine does not have the infrastructure to manage the disposal of this waste stream if beneficial use is limited. Balancing the statement "manage PFAS contaminated wastes safely and in a cost-effective manner" will be challenging and should be the leading line in this recommendation. Any additional or modified infrastructure proposed should be evaluated though a cost: benefit screening protocol.

In closing the LAWPCA Board thanks you for you work. Members of our Board attended several of your meetings and followed your materials, so we understand the complexity of this issue. Please accept our recommendations and if we can support you or the State Agencies furthering you work please contact me (207) 513-3003 ext3400 or ddoughty@lewistonmaine.gov. We will follow this e-mail with a document via US Mail.

***Respectfully,***
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***Public Works Director***
***Lewiston, Maine***