



## Portland Water District

FROM SEBAGO LAKE TO CASCO BAY

December 5, 2019

PFAS Task Force  
c/o Maine DEP  
17 State House Station, 28 Tyson Drive  
Augusta, Maine 04330

Sent Via Email - [pfastaskforce@maine.gov](mailto:pfastaskforce@maine.gov)

Dear Chairperson Tipton:

The challenges and concerns related to PFAS in Maine, New England, and the U.S. are significant and I would like to commend the members of the Task Force for their careful deliberation and review of this issue over the past months. This has been a significant undertaking, which has set the tone for Maine's response in the coming years.

There are many details in the Draft Report of the Maine PFAS Task Force and those details will be considered through future debate and policy actions. Recognizing this, I would like to share two over-reaching concerns related to biosolids management in Maine.

**Ch. 418 screening levels** – The Department of Environmental Protection (Department) has relied on screening levels for PFOS, PFOA, and PFBS in the evaluation of the suitability for biosolids for land application and for the distribution of composted biosolids. The modelling performed to derive the current screening levels was subsequently reviewed by an independent consultant, Stone Environmental, and the results were shared with the Department.

This review suggested the use of a model that more closely approximated actual biosolids land application practices along with the use of specific model parameters (i.e. ground water depth, soil adhesion, etc.) may be more appropriate. The use of the Stone Environmental model, with very conservative inputs, suggested screening levels that are protective of groundwater that could be several times higher than the current levels used by the Department.

**We request that the Department sponsor an evaluation of the current screening levels through a modelling approach that more closely simulates actual biosolids utilization. This model should be fully peer reviewed and used to determine future screening levels.**



**Perform a comprehensive study of biosolids management options** - The Department's sudden action to restrict the land application of biosolids and the distribution of composted biosolids created a significant shock to the already fragile biosolids management infrastructure. Beneficial use of biosolids, which was utilized to manage the majority of biosolids generated in Maine, provides for the utilization of this nutrient rich product. This important recycling of nutrients also provides a very cost-effective alternative managing the material generated each day by the 161-wastewater treatment plants working across Maine to protect public health and our treasured environment.

The Department's actions, coupled with the growing uncertainty surrounding possible future biosolids management restrictions have significantly disrupted the market and costs have increased. The expectation is that costs will soon begin to dramatically rise; how high is anyone's guess.

There is not enough landfill capacity to reliably manage the daily volume of biosolids generated in Maine. Additionally, incineration of biosolids has been suggested. However, there are no incinerators equipped to manage biosolids and permitting and constructing incinerators will take a decade and strain utility budgets.

When making statewide policy decisions regarding biosolids management (and restrictions on biosolids management), we believe the feasibility and costs of the conceptual solutions must be understood. To understand this, the Department should complete an inventory of the biosolids (and probably septage) to be managed, the existing infrastructure capacity to manage these volumes, and the infrastructure investment required to reliably meet these needs well into the future.

**We request that Department commission a study to determine the feasibility and costs of long-range infrastructure needs and related policy recommendations to manage biosolids.**

Thank you for your hard work and we look forward to meaningful engagement in this issue in the future. Please feel free to reach me at (207) 774-5961 or at [sfirmin@pwd.org](mailto:sfirmin@pwd.org).

Sincerely,

/s/ Scott M. Firmin, P.E.

Director of Wastewater Services