



Maryland Association of Municipal Wastewater Agencies, Inc.

Washington Suburban Sanitary Commission

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GENERAL COUNSEL

AquaLaw PLC

February 24, 2025

The Honorable Marc Korman
Chair, House Environment and Transportation Committee
250 Taylor House Office Building
Annapolis, MD 21401

Re: **OPPOSE -- HB 909 (Sewage Sludge Utilization Permits – Per-and Polyfluoroalkyl Substances – Concentration Limits)**

Dear Chair Korman:

On behalf of the Maryland Association of Municipal Wastewater Agencies (MAMWA), I am writing to share **serious concerns with HB 909**, which would direct the Maryland Department of the Environment (MDE) to issue sewage sludge (biosolids) utilization permits for agricultural land application with a limit of 1 microgram per kilogram for PFOS or PFOA. MAMWA is a statewide association of local governments and wastewater treatment agencies that serve approximately 95% of the State's sewered population. Many members rely on biosolids land application to manage the residuals that remain after treatment at their wastewater plants.

HB 909 would be **damaging for the State's citizens**. The bill would impact nearly every wastewater plant in the State and would **drive up costs significantly for our ratepayers**. If biosolids land application is de facto banned, local wastewater managers will scramble to find alternative options at higher costs.

MAMWA objects to asking our ratepayers to pay more for biosolids management when the private industrial companies that make or use PFAS and profit from PFAS are paying nothing. MAMWA's members take affordability very seriously. We do not want to pass along additional costs, especially when citizens are spending more for essentials like food, housing, transportation, and energy as a result of inflation.

We surveyed our members to ask them how much more their biosolids programs would cost under HB 909. Here are the estimated impacts for just a few of the State's wastewater treatment plants:

- **Utility #1:** Currently land applies in Maryland. Current annual cost is \$120,000. **HB 909 would increase costs to \$211,000 (76% increase).**
- **Utility #2:** Currently land applies in Maryland. **HB 909 would increase costs by approximately \$12,000,000 annually.**

- **Utility #3:** Current land applies in Maryland. Current annual cost is \$5,700,000. **HB 909 would increase these costs 6 times, increasing them to \$33,000,000.**
- **Utility #4:** Currently land applies in Maryland. Current annual cost is \$727,000. **HB 909 would increase costs to approximately \$3,452,000 or an increase of approximately 4.8 times.**
- **Utility #5:** Currently land applies in Maryland. Current annual cost is \$3,100,000. **HB 909 would increase costs to \$4,600,000 annually (48% increase).**
- **Utility #6:** Current land applies in Maryland. Current annual cost is \$3,000,000. **HB 909 would increase costs to \$3,500,000 annually.**

Another member who did not provide financial impacts shared that landfilling biosolids would increase costs significantly because of their location, limited access to landfills, and declining landfill capacity for biosolids as more and more plants are pushed to landfill the material.

MAMWA urges the Committee to consider the catastrophic impacts on the State's wastewater plants and their customers and **Vote NO** on HB 909.

Please feel free to contact me with any questions at Lisa@AquaLaw.com or 804-716-9021.

Sincerely,



Lisa M. Ochsenhirt
MAMWA Deputy General Counsel

cc: Environment and Transportation Committee Members
HB 909 Sponsor