



David L. Gadis, Chief Executive Officer

DISTRICT OF COLUMBIA WATER AND SEWER AUTHORITY | 1385 CANAL STREET, SE | WASHINGTON, DC 20003

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

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

Chairman Korman,

I represent DC Water's Blue Plains advanced wastewater treatment plant and the great biosolids program that we've developed. Our goal is to protect the environment, particularly the Chesapeake from carbon and nutrients present in sewage. DC Water receives flow from all over the region; 40% from Montgomery and PG county. 10 years ago we upgraded our biosolids system to both generate energy and produce a high quality biosolids product, which we market around the region as Bloom.

Because products containing PFAS compounds are ubiquitous, very small, background societal concentrations of PFOS and PFOA end up in municipal biosolids. These compounds are in products we use in our home every day at thousands of times higher concentrations than Bloom and as a result, the average household dust has 10 times the PFAS in Bloom. A farm field in MD receives as much PFOS from annual rainfall as from applying Bloom for corn growth.

In August, Maryland set guidelines for biosolids reuse to ensure industrially impacted biosolids are prohibited from land application and MDE requires municipalities to investigate and limit discharge from industrial facilities within their service area.

This bill would drive up costs significantly for Maryland residents and will negatively affect affordability. DC Water will need to find landfill space (the only viable option), at an estimated \$33M/yr. Maryland residents will share 40% of this additional cost without a significant reduction in their risk of PFAS exposure.

DC Water shares the concerns over PFAS in our society but disagrees with setting limits at levels many orders of magnitude lower than our daily household exposure. We do not want to impose these high additional costs on MD residents when it will do little to reduce their exposure risk. DC Water would welcome the opportunity to assist MDE in a campaign to educate residents on products they use that contain PFAS and alternatives to their use. A campaign such as this could have a significant impact on PFAS exposure levels and risk of contact.