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Janine Burke-Wells, President and the Executive Committee
New England Water Environment Association
10 Tower Office Park, Suite 601
Woburn, MA 01801-2155

January 21, 2019

Dear Members of the Executive Committee,

We at NEBRA appreciate the consideration you are giving to our request for a \$5,000 contribution to NEBRA's PFFund for all of calendar year 2019. The PFFund is a dedicated fund supporting NEBRA's ongoing work related to PFAS and wastewater, biosolids, and other residuals. This is becoming ever more critical work, as PFAS increases in visibility as an environmental concern. This will be a critical year for PFAS policy in New England.

Wastewater and residuals are a major focus of attention in the PFAS world, and municipalities across the region are – or soon will be – having to deal with this issue. In my 25 years in this field, this is by far the greatest disrupting issue ever. Consider:

- Already, one landfill company has set an interim policy to not accept biosolids with typical low PFAS levels at their landfills – because of PFAS liability concerns.
- Already, some farmers who have used biosolids for many years are deciding not to use them this year, because of the rumors of concerns around PFAS. Where will biosolids go, if more landfills and farmers follow suit?
- Already, one state – Maine – has adopted untenably low screening levels for materials placed on land (non-agronomic residuals). These standards could be applied to biosolids, if the DEP decides to. No biosolids can meet these screening levels, which are based on inappropriate modeling.
- Michigan is requiring WRRFs in that state to meet a surface water standard for PFOS of 12 ppt. Most New England WRRFs would have trouble meeting this limit currently – including the vast majority of facilities that have no significant industrial inputs of PFAS. PFAS are just ubiquitous from daily living.

The potential costs and disruptions to NEWEA members could be huge – and some impacts and costs have already occurred. Several of our region's state agencies are moving ahead to set drinking water and other standards; those, and how they interpret them in relation to wastewater, could result in the need for PFAS removal – even perhaps from effluent, which has not been done at scale and would be costly.

NEWEA needs to continue to be involved in this issue. One way is through this requested contribution. Another way is to adopt a policy statement. Perhaps the Government Affairs and other committees can get involved. And maybe the *Journal* can cover this topic more. I am glad to help, but I and NEBRA are small voices. More are needed. We appreciate the collaboration on the PFAS specialty conference at UMass Lowell last October.

Please review all we have done and compiled on this topic: <https://www.nebiosolids.org/pfas-residuals> (password member2017). And see the attached, which I think was provided to you previously. Questions and input are always welcome and needed. Thank you.

Ned Beecher, Executive Director



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Dear NEBRA PFFund Contributor,

On October 19th, the NEBRA Board of Directors voted to proceed with the PFAS Scope of Work that NEBRA had outlined and for which you had pledged funding to the NEBRA PFFund. Thank you for your support! Beginning now, I am assigned to proceed with that PFAS work through 2019. We ask that you follow through on your pledge when we provide you an invoice.

While I will do all I can to ensure dissemination of current, accurate, and useful information across the continent and ensure that the most critical issues and actions are properly prioritized, our work here will not be effective without your active participation.

Here's how I hope you and your organization will help for the next year+.

- Send email addresses of anyone else in your organization who you want to have "in the loop." We will add them to the email list for regular PFAS updates.
- Evaluate and monitor the PFAS issue locally, especially as related to wastewater, biosolids/residuals, and soils.
- Forward key information – news stories, regulatory & legislative actions, data (your test results – we have a growing compilation of anonymous data). These will be included in our running files, documents, and communications.
- Consider joining our PFAS Advisory Group. This group meets at least monthly to guide our work and help set policy. They are more "in the know."
- Add to your calendar the bi-monthly Nationwide PFAS Stakeholder webinars: Last Tuesday of odd-numbered months, 1:30 pm Eastern. Next one is Nov. 27th.
- Use the NEBRA PFAS webpage: <https://www.nebiosolids.org/pfas-residuals>
Access code: member2017 Check it regularly for updates.
- Let us know when you have questions or need help with a PFAS-related issue.

PFAS Background

Per- and polyfluorinated alkyl substances (PFAS) have emerged as the most significant family of chemicals of concern in biosolids, other residuals (paper mill residuals, composts, etc.), and wastewater that we, at NEBRA, have faced in the past 25 years. Concerned citizens, the media, and some regulatory agencies, especially in the Northeast, CO, MI, MN, NC, and WA, have begun to scrutinize biosolids and other residuals because of fears that PFAS chemicals may leach from soils and impact groundwater and surface water at levels approaching or exceeding screening values and regulatory standards. While the true human health impacts of PFAS in drinking water and the environment continue to be debated, some regulatory agencies are rushing to set standards, some of which are already crippling residuals recycling programs and affecting wastewater treatment. NEBRA's position on this topic is summarized in "PFAS & Recycling: Putting Them In Perspective," which is available here: <https://www.nebiosolids.org/nebra-publications>.

October 30, 2019

SCOPE OF WORK

for the period October 1, 2018 to December 31, 2019, for U. S. & Canada stakeholders

NEBRA will deliver the following services for those organizations providing funding for NEBRA's work on the topic of PFAS related specifically to biosolids and residuals management in the U. S. and Canada. This Scope of Work includes continuation of the activities that NEBRA has conducted to date, led by Ned Beecher. NEBRA's work is and will be focused on understanding and applying the best available science related to this topic. In Fall 2018 and through 2019, NEBRA will:

1. Provide easy access to NEBRA's growing compilation of data and documents related to PFAS and residuals and biosolids management (currently held on NEBRA's "members-only" pages). Current core documents include:
 - *PFAS & Recycling: Putting Them In Perspective* (v.2.2, Jan. 2, 2018, a 2-page fact sheet for use in defending against concerns about PFAS in residuals)
 - *NEBRA PFAS in Biosolids & Residuals - Fact Sheet* (v. 3.3, Jan. 9, 2018)
 - *NEBRA Literature Review: PFAS & Wastewater Residuals* (v. 1.0), with abstracts & notes - June 2018
 - *NEBRA PFAS Bibliography* (spreadsheet) - May 25, 2018
 - *Guidance: Sampling & Analysis of PFAS in Biosolids and Associated Media* - v. 2, Jan. 5, 2018
 - *Concentrations of PFAS in Biosolids, Residuals, Wastewater, & Associated Media* - a spreadsheet dataset of historic published data and recent screening analyses in various states
 - *FAQ: PFAS & Wastewater/Residuals/Biosolids*, Jan. 18, 2017. Working draft. Should you test?
 - *PFAS Research Proposal*, Dec. 2017. Not funded. Tabled, pending funding.
2. Provide timely responses to questions and information requests from PFFunders related to PFAS and biosolids and residuals management, by phone, email, and screen-sharing sessions.
3. Continue to offer bi-monthly informal webinar updates on PFAS and biosolids and residuals management, the last Tuesday of every other month, 1:30 pm Eastern time.
4. Expand the NEBRA PFAS Advisory Group to include non-member PFFunders, at their discretion. Convene meetings of the Advisory Group at least monthly to guide NEBRA actions and policy positions regarding this topic.
5. Continue to coordinate strategic efforts to engage in selected policy, legislative, and regulatory discussions, collaborating with other organizations and engaging specialists, as needed. This includes providing written comments, attending hearings, and conducting workshops and webinars.
6. Provide at least two workshops and/or webinars for biosolids and residuals management stakeholders, to ensure widespread dissemination of key, up-to-date information on the topic.
7. Attend and present at selected PFAS conferences & workshops, to ensure NEBRA and our stakeholders have and share the most current information related specifically to PFAS and biosolids and residuals.
8. Assist in development, advancement, coordination, and support of appropriate research efforts related to PFAS and residuals and biosolids application to soil, including coordinating with W-3170.

The North East Biosolids and Residuals Association (NEBRA) is a 501(c)(3) non-profit professional association advancing the environmentally sound and publicly supported recycling of biosolids and other organic residuals in New England, New York, and eastern Canada. NEBRA membership includes the environmental professionals and organizations that produce, treat, test, consult on, and manage most of the region's biosolids and other large volume recyclable organic residuals. NEBRA is funded by membership fees, donations, and project grants. Its Board of Directors are from MA, ME, NH, VT, and Nova Scotia. NEBRA's financial statements and other information are open for public inspection during normal business hours. For more information: <http://www.nebiosolids.org>.

Thank you!

The following organizations have been the core supporters of NEBRA's PFAS work to date:

SCA/Essity
Lystek
Resource Management Inc.
Chittenden Solid Waste District
Town of Merrimack, NH
Waste Management
Sanford Maine Sewerage District
Casella Organics
Northern Tilth
Natural Resource Solutions

The following organizations have made pledges to the NEBRA PFFund for the current Scope of Work:

in order by date of pledge

California Association of Sanitation Agencies (CASA)
DC Water
Orange County Sanitation District
Denali Water Solutions LLC
Garvey Resources
Enviroventures Inc.
National Association of Clean Water Agencies (NACWA)
Synagro
Mid-Atlantic Biosolids Association (MABA)
Eastern Pennsylvania Water Pollution Control Operators Association
NAWC Environmental, Pennsylvania
Casella Organics
Charlotte Water
Virginia Biosolids Council (VBC)
NW Biosolids
Waste Management
Lowell Regional Wastewater Utility
Renda Environmental
City of Concord, NH
Walker Environmental
Warminster, PA Municipal Authority
Golden Heart Utilities, Fairbanks, AK
Metro Vancouver
New England Water Environment Association (NEWEA)
LP Consulting
Beveridge & Diamond
Water Environment Association of Ontario (WEAO)
Paul Gormsen
Lystek
Merrell Brothers
RECYC QUEBEC
NEFCO
Central PA Water Quality Association
McGill Environmental Systems of NC, Inc.

This list updated 12/31/18.