January 23, 2024

# **PFAS** in Biosolids: How to Be Part of the Conversation

Presented by the Northeast Biosolids and Residuals Association





Janine Burke-Wells, NEBRA Executive Director 603.323.7654 Janine@nebiosolids.org Deborah Mahoney, NEBRA Past President 978.983.2069 Dmahoney@BrwnCald.com







### **Presentation Overview**

Ť

Who is NEBRA and what do we do?

×

PFAS: Why is it so Difficult to Talk About And Why We Need You to Be Part of the Discussion.

Communications and Public Outreach Strategies

X

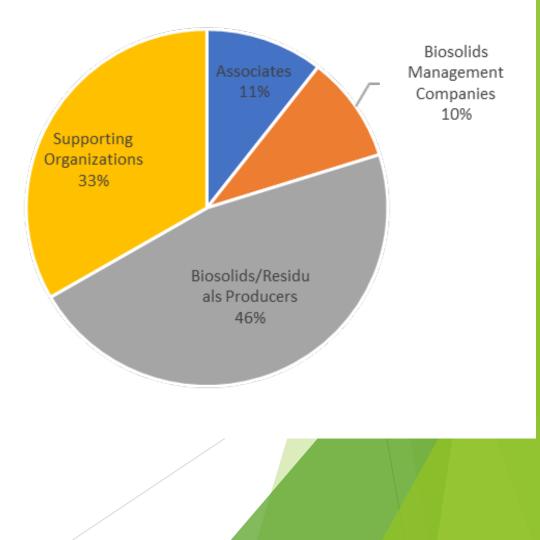
**Resources and Examples** 

# Who is NEBRA and What Do We Do?



NEBRA's mission is to cooperatively promote sustainable diversion, recycling and beneficial use of biosolids and residuals from the municipal and industrial sectors.

#### NEBRA Membership (2023)



# **NEBRA** and **PFAS**

- Early focus on PFAS (2017) due to major contamination issues in the region
- NEBRA-funded study on PFAS fate and transport in Maine soils (2019)
- ► NEBRA/NACWA/WEF cost impacts study (2020)
- ▶ PFAS education, communications, and advocacy for members (ongoing)



Water quality **P**rofessionals deliver safe water for **F**amilies and the environment. Addressing contaminants that modern living adds to the water cycle.

How can you help limit or manage contaminants before they enter the water cycle? Talk to your local water quality professional about PFAS.

SAFETY. SCIENCE. SOLUTIONS







April 24, 2023 The Honorable Shelley Moore Capito

The Honorable Tom Carper U.S. Senate Committee on Environment and Public Works Chairman U.S. Senate Committee on Environment and 410 Dirksen Senate Office Building Washington, D.C. 20510 410 Dirksen Senate Office Building Washington, D.C. 2051

Dear Chairman Carper and Ranking Member Capito

Public Works

The undersigned organizations represent local governments and private entities responsible for anfaguarding public health and the environment, including drinking water, watewater transment, shownwater management, and water recycling facilities, municipal solid wate landfills, and composing facilities. We write to urge that any legislation on per- and polyfuroalky substances (PTAS) that the US, Senate Committee on Environment and Public Works (EPW) considers include a specific provision to ensure that the organizations we represent are explicitly recognized as "passive receivers" of PFAS and afford these essential public services a narrow are explicitly recognized as "paiave receiver" of PFAS and afford fisse essential public services a narrow (CERCLA). Absent such relation of the service of the defension of the service of the service

The U.S. Environmental Protection Agency (EPA) has stated often, including during Assistant Administrate Rhadilise fox's tastimory to IEPW, that the agency would use its "discretionary authority" in parasing CERCLA enforcement actions against eretrain parties. However, this commitment offers little confict to our sectors given the expansive rights of Potentially Responsible Parties under CERLCA to bring contribution litigation against other entities that are alleged to be additional sources of hazardous substances at a cleanup

EPA has stated that it has insufficient existing legal authority to provide relief to public service providers from the impact of CERCLA contribution litigation. Claims for contribution against passive receiver groups thus would generate significant litigation costs for landful operations going back decade—onst that would lead to significant cost increases on essential public service providers and the communities and residents they serve.

It is important to highlight that our members deliver essential public services that do not involve the nanufacture or use of PFAS. We are passive receivers of media containing PFAS that are ubiquitous in the

# PFAS: Why is it so Difficult to Talk About And Why We Need You to Be Part of the Discussion

### You Cannot Avoid Talking About Emerging Contaminants





## The Communication Challenges with PFAS

- Regulations not uniform, vary by contaminant, inconsistent and confusing
- Fate & Transport very complicated for PFAS!
- Toxicological/Epidemiological lots of unknowns, gaps in research. No known medical interventions.
- Technical identifying source(s) of pollutants, determining effective removal/destruction methods
- Analytical Abilities still limited for PFAS
- Quality of Life Issues community outrage, misinformation

<u>Adopted from: 14 Risk Communication - PFAS - Per- and</u> <u>Polyfluoroalkyl Substances (itrcweb.org)</u>



# Why You Need to Get Involved in the Conversation



It's your responsibility as a member of the clean water community and as a citizen of the world

If you have to raise rates, your customers might not like it but they will understand it

https://www.unwater.org/bethechange/

"What you do makes a difference, and you have to decide what kind of difference you want to make." – Jane Goodall

### **Others Are Framing the Debate**

By David Abel Globe Staff, December 1, 2019, 7:32 p.m.

### Toxic ch 'Forever chemicals' are found in MWRA River, fc fertilizer, drawing alarm

By David Abel Globe st

Image: Section of the section of

60

Communication and Public Outreach Strategies

# Steps To Take to Tackle PFAS

# Understand

Mitigate

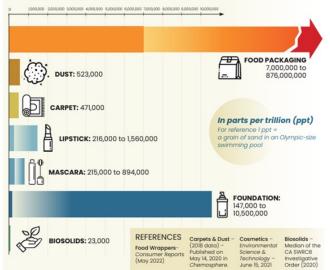
# Educate and Outreach

#### **PFAS** BY THE NUMBERS

Per and polyfluoroalkyl substances (PFAS) are a group of manmade fluorinated compounds that have been in commercial use since the 1940's and are abundant in today's society. These chemicals are widely used for their resistance to heat, water, and oil. PFAS are found in every American household, and in products as shown in the bar graph with typical concentrations. Entities providing essential public services such as safe drinking water, wastewater treatment, water recycling, biosolids recycling, and municipal solid waste management are not "users" or "producers" of PFAS but receive them as a function of their prevalent use in society.

Cur collective essential public service mission is to ensure safe drinking water, wastewater treatment, and sanitation services. We embrace our role as environmental and public health stewards and our continued responsibility and commitment to providing a clean environment now and for future generations. To ensure successful achievement of our mission, we must transition away from use of PFAS in our society.

#### RELATIVE RANGES in parts per trillion



# **10** things you can do about toxic **PFAS chemicals**

PFAS are a family of almost 9,000 human-made chemicals that are effective at repelling grease, water, and stains, as well as combating certain types of fires. PFASs are in cookware, food packaging, stain resistant carpets and clothing, some cosmetics, outdoor gear, and even dental floss. You may know them as Teflon\*, or Scotchguard\*. Virtually all Americans have them in their bodies. They've been detected in San Francisco Bay and the fish that ally eaple catch and consume from those waters. They've also been detected in California drinking water sources serving 19 million people.

PFAS chemicals have been linked to cancer, high cholesterol, birth defects, suppression of vaccines, and other serious health effects. They all persist in the environment and are virtually indestructible. Even if we stopped using all of them tomorrow, we would still have an on-going problem.

Because it is difficult to completely avoid exposure to PFAS, Clean Water Action is working to stop the use of these toxic chemicals. In the meantime, there are some simple things that you can do to limit your exposure:

#### Ditch the non-stick cookware — even if it says PFOA (a type

of PFAS) Free. When heated at high temperatures, PFAS-containing cookware gives off fumes that are serious enough to cause flu-like symptoms in people and even kill pet birds. Don't be fooled by PFOA-free labels, as that may just mean that the PFOA was replaced by another PFAS. Stainless steel and cast iron cookware are great alternatives.

2 Can't replace the cookware? Reduce the heat. Don't preheat nonstick cookware and never use it in an oven heated at or above 400 degrees. Also never use steel wool or other scraping cleaners on non-stick items; this can release the coating into your food or the environment.

Pop your own corn. Microwave popcorn bags, including organic products, usually have PFAS coatings inside that can leach into your snack and are released into the air when you open the bag. Instead, buy loose popping corn and pop it on the stove. Alternatively, pop loose kernels in a covered bowl or paper bag in the microwave.

Bring your own container for to-go food. Eating out? Bring your own metal or glass container to bring home your leftovers. You'll avoid PFAS in take-out containers and reduce trash. Also limit foods like hamburgers, pastries, or french fries that come in grease-resistant packaging. Studies have detected PFAS in almost half of tested wrappers or pastry bags.





<section-header><section-header><image><image><image><image>

#### What Are PFAS?

Per and polyfluoroalkyl substances (PFAS)<sup>1</sup> are a group of manmade fluorinated compounds which are used for a variety of applications by both industry and residential households. PFAS have been in commercial use since the 1940's and are abundant in today's society. These chemicals are widely in use because of their exceptional resistance to heat, water, and oil.

PFAS are commonly found in every American household, and in products as diverse as nonstick cookware, stain resistant furniture and carpets, wrinkle free and water repellant clothing,

### Understand What You Know and What You Don't Know

"PFAS Producers Are Not Same as Receivers"

### What You Know and What You Don't Know

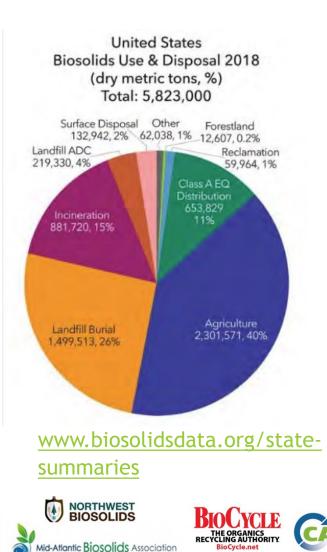
- Test Influent, Effluent, and Biosolids
- Potential Upstream PFAS Sources
- State Biosolids Master Plan
- Regulations and Legislation -
- PFAS Treatment Emerging Technologies and Solids Reduction Technologies



Leverage Professional Organizations: NEBRA, NEWEA, ASAs, NEIWPCC

### **Mitigation**

- Identify Potential PFAS Sources and Consider Source Control
  - **IPP** Investigations
  - **SIU** Reductions
- **Evaluate Solids Management** 
  - **Biosolids Master Plan**
  - **Reduce Solids**
- **PFAS Treatment Emerging** Technologies and Solids **Reduction Technologies**



Mid-Atlantic Biosolids Association



Huber Belt Dryer



CHAR Technologies High Temperature Pyrolysis

### Develop and Implement a PFAS Communications Plan to Educate and Inform

- Identify Stakeholders
- Develop Messaging (we can help – it's not that scary!)
- Basic Information for Customers:
  - What is PFAS and Why are PFAS a Health Concern?
  - What Can I Do?
  - What are you doing to reduce risks?

### PFAS

Per- and polyfluoroalkyl substances (PFAS) are a large family of human-made chemicals in use since the 1950s to make a wide variety of stain-resistant, water-resistant, and non-stick consumer products. Watch our videos and read more about PFAS below.

#### What Are PFAS?

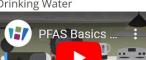
Why are PFAS a Health Concern?



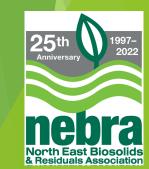


t Takes Time for

Start Going Down in Your Body



#### PFAS | Washington State Department of Health



# Risk Communication Requires



15-20%



Effective Risk and Crisis Communication during Water Security Emergencies SUMMARY REPORT OF EPA SPONSORED MESSAGE MAPPING WORKSHOPS

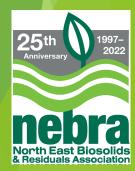


10111000



## **BC PFAS Communications Guide**

	DON'T
your commitment. his opportunity to support and share local PFAS nd connect and build positive relationships. Show ten, and describe action. Utilities can play a key role cating the public and increasing public confidence h their direct connection with customers.	<b>Be defensive.</b> While reactiveness on the topic of PFAS is understandable, given changing regulatory guidelines and common public misperceptions, it does not build trust.
owledge concerns. customers' fears about potential exposure and impacts.	Minimize concerns. People are legitimately worried about their health and the health of their families and loved ones.
ess the issue. commonly accepted information and local data abou sources, potential health risks, ways to minimize	Ignore the issue. PFAS have reached a level of heightened concern, given their presence throughout the environment and inability to
commonly accepted information and local data abou sources, potential health risks, ways to minimize ure, and how to learn more.	



# **BC PFAS Communications Guide**

#### DO

#### Share information that's understandable.

Use clear visuals and simple figures. Minimize text.

#### Share relevant information.

Connect directly to interests, common concerns, and most likely exposure channels.

#### Show your work.

Explain concrete actions that your utility or organization is taking to proactively understand PFAS levels in your community and address PFAS.

#### Use available resources.

Consult reputable organizations for help in developing a communications approach and effective tools.

#### DON'T

#### Get too technical.

Avoid industry jargon and acronyms. Provide definitions for technical or complex terms.

#### Forget the context.

Provide information that connects directly with your audience's experience.

#### Over-promise.

Clarify the time and resources needed to effectively address PFAS.

#### Go it alone.

Connect with other utility leaders facing similar challenges. Consult materials and toolkits developed by local and national organizations.



# **Resources and Examples**

### Some Regional Efforts on PFAS

**NEWEA** 

**se nebra** 

#### NEBRA/NEWEA Collaboration on outreach materials

Water quality **P**rofessionals deliver safe water for **F**amilies and the environment, **A**ddressing contaminants that modern living add**S** to the water cycle.

How can you help limit or manage contaminants before they enter the water cycle? Talk to your local water quality professional about **PFAS.** 



TaxPayers count on saFe and responsible recycling of water and organic matter using cost effective, sustainable practices that support drinking water, recreation, business use, And improved Soil quality.

SAFETY. SCIENCE. SOLUTIONS.

Synthetic chemicals in household cleaning Products, firefighting Foam, food packaging, clothing, and beauty products Are driven by consumer demand for Safer living.



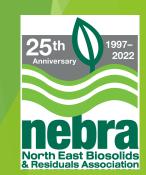
SAFETY. SCIENCE. SOLUTIONS.

Are you making informed choices? Talk to your local water quality professional about **PFAS.** 



PFAS - NEWEA - New Englandhttps://wWater Environment Associationpfas/pfas

https://www.newea.org/resources/ pfas/pfas-campaign-partner/



### Some Regional Efforts on PFAS

NEBRA/NEWEA Collaboration on State PFAS Legislation Tracking

	NEW	EA PFAS Task Force Legislative Tracking		19-Jan-24					
	State	Bill Summary	Bill Number	Link for Bill Text	Committee	Position	Status	Person Assigned to Watch	Disposition
	ст	An Act Requiring The Testing Of Water For The Presence Of PFAS During The Home Inspection Conducted in Connection With The Sale Of A Home. To inform prospective homeowners about the presence of PFAS contaminants in water.	SB101	https://www.cga.ct.gov/asp/cgabilistatus/cga bilistatus.asp?selBiliType=Bili&which_year=2 023&bill_num=101	Joint Committee on Environment			Vanessa McPherson	No action taken in 2023
	ст	An Act Establishing A Grant Program To Reimburse Municipalities For Costs Related To Removal Of PFAS From Fire Apparatus. To establish a grant program to reimburse municipalities for costs related to removal of PFAS from fire apparatus.	HB5250	https://www.cga.ct.gov/asp/cgabilistatus/cga bilistatus.asp?selBillType=Bill&which_year=2 023&bill_num=5250	Public Safety & Security		Passed?	Vanessa McPherson	Some activity but no vote in 2023
	MA	Moratorium on PFAS Emitting Structures	S2053	https://malegislature.gov/Bills/193/SD1716	Referred to Senate Ways and Means	OPPOSED	Passed out of joint administrative committee in 2023	Mickey Nowak	
x	ма	Providing farmers with immunity from claims caused by PFAS in soil, water, or agricultural products as a result of standard practices. Require testing of all biosolids and retail fertilizer, compost, mulch, topsoil and soil amendments for PFAS.	539 - H101	https://malegislature.gov/Bills/193/HD1171	Referred to the Joint Committee on Agriculture			Mickey Nowak	Hearing on 5/5/23 but no further action
	ма	Create PFAS Remediation Trust Fund from manafacturing/marketing AFFF settlement funds, transfer of funds or other private/public donations. Use fund to issue grants for drinking water, groundwater, and soil cleanups. Surface water and groundwater discharge permits to inlcuded BMPs for discharge of PFAS. Ban of intentionally added PFAS in food packaging and consumer products.	\$1356 H2197	https://malegislature.gov/Bills/193/HD3324	Referred to the Joint Committee on Public Health				Hearing held on 6/21/23; no further action
	ма	DEP to develop regulations for best practices regarding proper disposal of products containing PFAS.	HD389	https://malegislature.gov/Bills/193/HD389	Referred to Joint Committee on Environment and Natural Resources				Scheduled for hearing on 6/14/23; no further action
x	MA	An Act to protect Massachusetts public health from PFAS; see lines 79 to 89 where they are requiring quarterly PFAS testing for groundwater discharge permits. Not much to worry about here?	HD3324; SD2053	https://malegislature.gov/Bills/193/HD3324	Public Health			Mickey Nowak	Hearing held on 6/21/23; no further action
x	ME	An Act to Support Farming in Maine by Extending the Deadline for Manufacturers of Products Containing Perfluoroalkyl and Polyfluoroalkyl Substances to Report on Those Products	LD1960	https://legisiature.maine.gov/LawMakerWeb/ summary.asp?ID=280089482	ENR		Carried over		Carried over to next session





### Some Regional Efforts on PFAS

 NEIWPCC Residuals Workgroup and BioHub



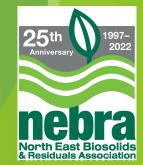
Biosolids improve soil health and increase crop yields better than chemical fertilizers do.



Using biosolids saves farmers money, creates jobs, and lowers treatment costs.

# **Selected Resources**

- PFAS Team ITRC (itrcweb.org)
- Stop PFAS at the Source! (wef.org)
- Per- and Polyfluoroalkyl Substances (PFAS) - List of Scientific and Technical Studies Related to Solid Waste (erefdn.org)
- Biosolids | US EPA
- Resources: Key Topics of Interest NEBRA (nebiosolids.org)



https://www.wef.org/globalassets/assets-wef/3---resources/topics/an/biosolids/biosolids-communications-toolkit.pdf

### **Examples to Follow**

Madison Metropolitan Sewerage District PEAS Initiative

About PFAS v Results v What We're Doing What You Can Do v News & Updates Contact

#### WHAT YOU CAN DO

PFAS are abundant in our society as it's found in a wide variety of consumer products and industrial products, which means we all have a role to play in reducing PFAS in our air, water and soil.

Learn what you can do to reduce or eliminate PFAS in your life, home and business.

# Madison Metropolitan Sewerage District (Madison, Wisconsin)

https://madsewerpfasinitiative.org/

#### FOR CONSUMERS

Click each toggle to learn more.

#### LEARN WHAT'S IN YOUR DRINKING WATER

If you are on a municipal water system, check your utility's annual water quality report see whether your levels of certain PFAS chemicals exceeded the EPA's advisory level. Consumers who learn that their water has high levels of PFAS chemicals in it should consider installing reverse-osmosis filters; these are the most effective at filtering them out. Carbon filters that can be connected to faucets or installed where water enters your home are also effective, especially for PFOA and PFOS, though they may not work as well for some of the newer alternative chemicals. If you are a customer of the Madison Water Utility, their 2020 PFAS testing report is available online.

**BEWARE OF CERTAIN FOOD PACKAGING** 

AVOID WATER-PROOF, WATER-RESISTANT AND STAIN-RESISTANT PRODUCTS

INVESTIGATE PRODUCTS





### **Examples to Follow**

- Social Media and Website
  - Many NEBRA members in Maine doing great work!

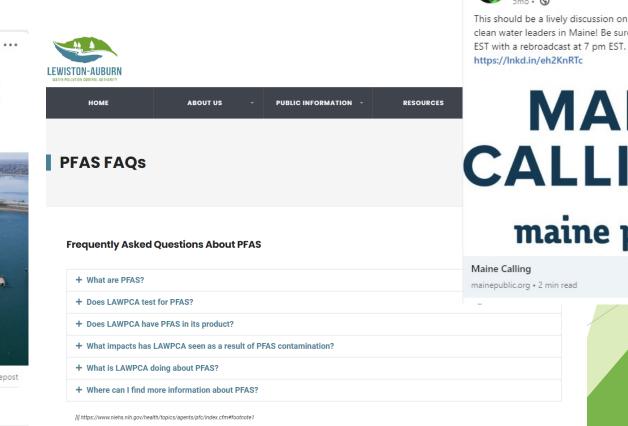
Portland Water District Hartani 520 followers 8mo • 🕥

We're taking proactive steps to tackle PFAS-contaminated wastewater biosolids by exploring regional solutions to reduce or eliminate PFAS, "forever chemicals," from wastewater biosolids.

#### https://lnkd.in/eKCpJmR6



CQ 35 1 repost A Like C Repost Comment Send



Philip Tucker reposted this ... North East Biosolids and Residuals Association (NE... • 1st Recycled Organics: Tools for Sustainability 5mo · 🕤 This should be a lively discussion on PFAS and Water Quality, featuring clean water leaders in Maine! Be sure to tune in on August 24th at 11 am MAINE CALLING maine public

& Residuals Association

[ii] https://www.atsdr.cdc.gov/pfas/health-effects/us-population.html#:~:text=As%20the%20use%20of%20some,declined%20by%20more%20than%2060%25

## **Examples to Follow**

Letters and Print Media

Presentation last saved: Just now

llod substances (PEAS) in blood serum (1999-2014) in the United Sta

#### Product Stewardship Yields Results

80% Drop in Blood<br/>Levels after<br/>Voluntary<br/>Termination of<br/>PFOA/PFAS (2015)Written Notice on its use in<br/>products with an ultimate<br/>ban on intentionally added<br/>PFAS in products will<br/>continue to reduce presence<br/>of these compounds.



PFOS Concentrations in Various Commercial Soil Amendments (ng/g or ppb)

Data from Lazcano, etal. 2020

#### Source Reduction is the key to PFAS Elimination

Land Application

of Biosolids is

generally not

practiced in

Connecticut.

Fac

Sampling at Wastewater Treatment Facilities should be focused on the goal of understanding PFAS where it is generated and how to manage reduction/elimination at the source.

Requiring excessive testing at Treatment Facilities increases cost to rate payers!

#### \*However, based on available data, many commercially available soil amendment products have higher levels than biosolid based products\*

#### Regulating Wastewater and Biosolids Does Not Achieve the Goal



District Office Telephone: 324-5313 Fax 324-5087 Treatment Plant Telephone: 324-0047 Fax: 324-9830

#### SANFORD SEWERAGE DISTRICT

281 River Street \* P.O. Box 338 SPRINGVALE, ME 04083-0338

June 1, 2023

Town of Wells Attn: Michael Pardue, Manager 208 Sanford Road Wells Maine 04090

Dear Mr. Pardue,

The Sanford Sewerage District (SSD) would like to inform you of our position regarding *Per- and polyfluoroalkyl substances* (PFAS) found in many products eventually making its way into the wastewater stream. In 2022, the 130<sup>th</sup> Legislative body passed two substantial PFAS bills that impacted biosolids disposal options. LD 1911 prohibits any beneficial reuse of biosolids products. LD 1639 prohibits out of state construction demolition debris. Since the passage of these laws, costs of handling this sludge are increasing and reductions in licensing facilities to handle sludge are why our rates for sewerage and septage recently increased. We are continuing to monitor the cost fluctuations. If we are forced to reduce the amount of biosolids due to the lack of disposal options, we may need to make a hard decision to stop accepting out-of-town septage.

Created in 1947, the primary function of the SSD is to treat waste carried through our municipal system to protect our public waterways. In addition to treating our municipal waste, we also accept septage from many private septic systems. We are one of the few plants in southern Maine capable of receiving large volumes of septage.

In 2022, SSD received and treated over 8.1 million gallons of septage throughout York and Cumberland Counties. Your community alone generated 1,163,084 gallons. Treatment costs are rising with state legislation intended to protect us from PFAS. SSD was forced to raise rates which in turn is passed on to the septic haulers as well as our 4,700 in city customers.

With rising costs for biosolids disposal, the Trustees felt it was crucial to inform our neighbors of a greater challenge we face. The news has also reported the few licensed facilities accepting treated sludge are quickly filling up. Our district has NO plans to suspend receiving septage. However, if we are ever required to reduce our sludge generation, we may also need to reduce our ability to accept septage to continue safely treating our municipal severage.

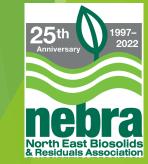
This letter is to educate those with septic systems because PFAS involves more than just public sewer systems rate payers. The PFAS compounds are ubiquitous in society and it is very important we all remain informed and work with our legislators as they deal with the crucial issues of handling PFAS. Your help is important and there are ways to minimize your exposure which may reduce PFAS in your wastewater.

We have enclosed more detailed information highlighting the history of this subject, legislation regarding this, and how the SSD has been dealing with it. Please contact us with any questions.

Sincerely, André Brousseau- Superintendent

Encl.

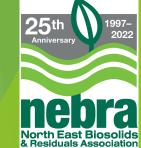
LD 1911 http://www.mainelegislature.org/legis/bills/getPDF.asp?paper=HP1417&item=1&snum=130 LD 1639 http://www.mainelegislature.org/legis/bills/getPDF.asp?paper=SP0523&item=1&snum=130p



# In Closing.....

- Educate Yourself...PFAS is complicated, and the industry and legislation is always changing
- Develop an outreach plan
- > You are NOT alone
  - Professional Organizations
  - Resources and Examples are available
- Take Your Head Out of the Sand!





# Thank you. Questions?



Janine Burke-Wells, NEBRA Executive Director 603.323.7654 Janine@nebiosolids.org Deborah Mahoney, NEBRA Past President

978.983.2069 Dmahoney@BrwnCald.com



Brown AND Caldwell