

Joint Committee on Health Care Financing
Sen. Cindy Friedman & Rep. John Lawn

8 May 2024

Re: H.4486 An Act To protect Massachusetts public health from PFAS

Thank you for the opportunity to comment on H.4486. The Wastewater Advisory Committee (WAC) to the Massachusetts Water Resources Authority (MWRA), is made up of volunteers from across various specialties and communities to advise MWRA on all things related to wastewater, including treatment, location, disposal, recycling, and environmental and social impact.

WAC is strongly supportive of the provisions of this act that reduce or replace PFAS in manufacturing. “Turning off the tap” of these ubiquitous and long-lasting compounds is key to their control in the environment.

But waste water treatment and biosolids recycling facilities, such as those that MWRA operates, are not producers of PFAS. To treat them as such is not effective. We need to understand better where PFAS are entering the wastewater stream—and the research into this is still being conducted.

Publicly owned wastewater plants were not constructed to remove these compounds.

Section 3 of this legislation, lines 133-140, would make MWRA’s current process of pelletizing and selling biosolids for land application impossible.

MWRA’s Deer Island Treatment Plant, treats the sewage from 43 communities (roughly 1/3 of the Commonwealth’s population), more than 330 million gallons per day (on average) with peak flows up to 1,270 MGD—an essential service that keeps the Boston Harbor and Massachusetts Bay clean, fishable and swimmable. The solids transported to the plant are currently anaerobically digested and processed into fertilizer pellets, since the bulk of the solids, outside of fiber, are nutrient-rich.

This method was adopted after significant public input as the most environmentally-sound way to handle valuable nutrients. Of course, that process was conducted before the public was aware of PFAS and their health effects. The remaining options for biosolids are incineration and landfilling—both of which have significant environmental consequences and financial costs.

Currently, the plant sends about 32,000 tons of solidsⁱ to the pelletizing plant in Quincy. All of them are beneficially reused—mostly land-applied. About 8.4% were applied within the Commonwealth. That process will cost the MWRA ratepayers about \$25 million next year (and every year thereafter for 10 years)ⁱⁱ. If land application is banned, and the pellets must be landfilled, it will cost an additional \$3 million next year.ⁱⁱⁱ

But that’s not the only cost. Shipping these pellets uses trains, trucks and diesel—which has emissions. Incineration by definition increases emissions. Landfill space in the Commonwealth and across New England is scarce and becoming scarcer. And most landfills leach. That leachate is often sent to wastewater treatment plants.

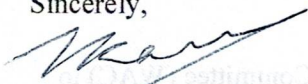
And wastewater treatment plants are not designed to remove PFAS from effluent or solids.

WAC is a citizens’ advisory committee to the MWRA on wastewater issues. We provide an independent forum for discussion of these matters. Environmental improvement, safety, cost and technical issues are all considered when formulating our recommendations. 1 | Page

We ask that the Commonwealth study the impacts of banning land application and compare the risks of PFAS with the environmental and fiscal costs of incineration, trucking, and landfilling before including Section 3 in this legislation as written.

In sum, WAC supports passage of H.4486, but does not support the inclusion of Section 3 without further study into the environmental consequences of this provision.

Sincerely,



Kannan Vembu, Chair

Wastewater Advisory Committee to the MWRA

ⁱ FY 2023 volumes

ⁱⁱ Memo to the MWRA Board of Directors, in Nov. 15, 2023 [Board materials](#) page 169

ⁱⁱⁱ Ibid.