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United States Environmental Protection Agency  
EPA Docket Center, OLEM Docket, Mail Code 28221T  
1200 Pennsylvania Avenue NW  
Washington, DC 20460

**Submitted via: [www.regulations.gov](http://www.regulations.gov)**

*Re: Comments on Interim PFAS Destruction and Disposal Guidance  
USEPA Docket ID EPA-HQ-OLEM-2020-0527*

To Whom It May Concern:

The North East Biosolids & Residuals Association (NEBRA) is pleased to provide comments on the U.S. Environmental Protection Agency's draft interim guidance on the destruction and disposal of per- and polyfluoroalkyl substances (PFAS).

NEBRA is a non-profit professional association and our mission is to cooperatively promote the environmentally sound recycling or beneficial use of water, wastewater, and other residuals in New England and eastern Canada. The prevalence of PFAS in society is reflected in the solids generated during wastewater treatment. Existing wastewater treatment facilities were not designed to remove PFAS and much of the PFAS do end up in the solids generated during the treatment process. Typical biosolids/residuals PFAS concentrations are in the parts per billion unless there is a major source discharging to the wastewater system.

About half of the solids generated during wastewater treatment in the United States are beneficially reused as soil amendments on a small percentage of total available agricultural land. For this reason, we are very concerned with PFAS passing through our wastewater systems. We are currently attacking the problem through pretreatment and source reduction in the hopes of maintaining this valuable use of recycled organics which include many nutrients necessary for soil health and have been shown to increase soil's ability to sequester carbon.

NEBRA has concerns around the clarity of this guidance's relevance to the beneficial uses of biosolids as regulated under Section 503 of the Clean Water Act. To ensure clarity for residuals managers, we ask that the final interim guidance explicitly state that it does not cover the beneficial reuse of biosolids as that is not considered disposal or destruction. With respect to highly-contaminated wastewater residuals, we believe thermal processes hold the most promise. Landfilling this waste is not sustainable and will generate PFAS-laden leachate that in most cases ends up back at the wastewater treatment facility.

With respect to the option to store PFAS-contaminated materials until such time as a viable destruction/disposal option becomes available, what are the recommended/reasonable quantities and appropriate timeframes for storage? Is this option intended to be consistent with the Section 503 regulations?

NEBRA appreciates the amount of work that went into this interim guidance and this is an important document. We thank you for the opportunity to comment. NEBRA is willing to have further discussions and provide additional information about the sustainable recycling of wastewater solids in the age of PFAS.

Please feel free to contact me at [janine@nebiosolids.org](mailto:janine@nebiosolids.org) or (603) 323-7654.

Sincerely,



Janine Burke-Wells  
Executive Director

cc: Liz Resek – USEPA OST  
Jeff McBurnie, NEBRA Reg-Leg Committee

**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 CT, MA, ME, NH, RI, 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>.