



Portland Water District
FROM SEBAGO LAKE TO CASCO BAY

February 4, 2022

Re: LD 1911, An Act to Prohibit the Contamination of Clean Soils with So-called Forever Chemicals

Dear Representative [REDACTED]

We are writing to ask you to take into account the direct impacts that immediate implementation of the concepts presented in LD 1911 and its proposed amendment will have on Portland Water District and our ratepayers – your constituents.

If you are inclined to support LD 1911 and its amendment, we ask that you consider delaying implementation and allowing a transition time of two years, as the Department of Environmental Protection initially recommended in its testimony on the bill.

As background for this request:

- Twenty million gallons of wastewater arrive at Portland Water District's treatment plants 24/7. We cannot slow it down or turn it off.
- Sixty-five tons (two full trailers) of biosolids are generated daily, non-stop, from the treatment processes.
- The biosolids are deposited into large trucks as they are generated. These "raw" biosolids are smelly and must go somewhere within hours of being loaded.
- There is capacity to store the accumulating biosolids at the treatment plants for a few days. After that, the material needs to be trucked from the site or the treatment plants become non-operational. This would be catastrophic.
- When a truck is full, it leaves the treatment plant for the landfill and is replaced by another truck.

Portland Water District's biosolids are landfilled. We have no other option. A statewide prohibition of land application and composting of biosolids will divert nearly all biosolids to landfills. We are greatly concerned that landfills will not have the capacity to accept and process our biosolids when biosolids from other sources are required to be delivered there. We fear it will also put pressure on trucking capacity and the ability to timely transport material from our plants to landfills.

Our current landfilling option, Casella, recently shared that the outcome of LD 1911 will likely affect their ability to deliver biosolids management services statewide to all of its customers. This uncertainty is alarming to say the least.

Our ratepayers, your constituents, will be burdened with increased costs due to LD 1911 as state landfills deal with the impacts of this legislation. In the past two years alone, our biosolids-related costs have increased by nearly 60% -- \$900,000 -- as a result of restrictions imposed on the management of biosolids. An additional \$250,000 per year is estimated for the recent surcharge of \$10/ton for PFAS mitigation efforts.

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The issues surrounding PFAS are challenging. Please consider a transition period of two years, which could allow time for the DEP to develop a plan to identify long term options for the management of biosolids in Maine. Unless a viable management plan for biosolids is developed, the PFAS problem does not go away.

Thank you for considering this information in your deliberations. Do not hesitate to reach out to Scott Firmin at 207-774-5961 x 3077 with any questions.

Respectfully,



Scott Firmin
Director of Wastewater



Carrie Lewis
General Manager