

# Biosolids Beneficial Use Program Update

Clean Water Program  
December 2025





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# Agenda

- Why DEP is proposing revisions
- Areas of focus
- Next Steps



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# Biosolids Stakeholder Outreach

- Concern from various stakeholders and the public in general
- PFAS affects all DEP programs
- PFAS Data Gathering Team
- Biosolids Stakeholder Work Group

# How Did We Get Here?

- 2021 Permit Revision Proposal and Previous Stakeholder Outreach efforts
- HR 149 of 2021 → 2023 LBFC Report
- Current State of PFAS
  - Drinking Water MCLs
  - EPA Draft Risk Assessment of PFAS and Biosolids



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## Focus Areas of Concern

- Managing Biosolids with consideration of PFAS
- Managing Biosolids with consideration of phosphorus
- Clarifying in-field storage requirements of biosolids
- Clarifying requirements for processing and beneficial use of biosolids and residual waste at sewage treatment facilities



# PFAS Monitoring

- Biosolids Monitoring Requirements
  - I. The frequency of monitoring yet to be decided.
  - II. Monitoring results will be provided with the submission of the Recordkeeping and Reporting Form or at the request of the Department.
  - III. Monitoring results must be obtained from a properly accredited lab using the most current version of EPA Method 1633.

# PFOA and PFOS Limits

- Add PFOA/PFOS requirements (PAG-07 & PAG-08)
  - I. Sources of PFAS in sewage sludge include industrial (e.g., electroplating plants), commercial (e.g., car washes), residential (e.g., cosmetics), and landfill leachate
  - II. Generally utilized State of Michigan as a model for tiered application limits
  - III. Tiered limit strategy will help mitigate risks and better inform generators/farmers/landowners



# PFOA and PFOS Limits

- Biosolids Land Application Limits for PFOA/PFOS:
  - I. <20 ppb ( $\mu\text{g/kg}$ ) PFOS and PFOA – Land application can occur.
  - II.  $\geq 20$  ppb to  $\leq 100$  ppb PFOS or PFOA – Reduce application rate to 1.5 dry ton/acre maximum.
  - III. >100 ppb PFOS or PFOA – Land application is prohibited





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# Phosphorus Reduction Strategy

- Option 1: Use of P-Index based land application requirements
  - I. Treatment Facilities Nutrient Reduction Requirements
  - II. CAOs and CAFOs currently utilize for management of manure application
  - III. 2-year phase in for existing land application sites
  - IV. New land application sites would be immediately subject to requirement
  - V. Utilize Penn State's Pennsylvania Phosphorus-Index tool
- Option 2: Use of an agronomic soil test threshold
- Option 3: Use of an environmental soil test threshold



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# Storage & Wet Weather Issues



- Liquefaction
- Movement of Liquified Material
- Regulatory/Compliance Issues





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# Storage & Wet Weather Issues







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# Storage & Wet Weather Issues





# Storage and Wet Weather Issues

- Biosolids storage requirements will mirror the manure stacking requirements outlined in DEP's *Manure Management Manual* (332-0300-002)
  - I. Stack to shed water
  - II. Observe isolation distances
  - III. Manage run-on and run-off



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# Biosolids/Residual Waste at STPs

- Allow for the mixing of high strength organic waste with sewage sludge
- Currently, if not incorporated into head of plant, the resulting biosolids is a mixture and cannot be land applied under PAG-07 and PAG-08
- Will require the incorporation of 25 Pa. Code Chapter 271 Subchapter I requirements



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## Next Steps for AAB Review

- Finish pre-draft revisions to the general permits with input from Stakeholders Working Group
- Provide pre-draft revised general permits to the AAB Q1 2026
- Circle back with the pre-draft at the February 12 AAB Meeting if possible





# Get In Touch

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