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These comments are provided on behalf of the W.J. McCabe Chapter of the Izaak Walton League of America (IWLA) to provide our input on the Minnesota Pollution Control Agency's (MPCA) draft strategy for addressing PFAs in biosolids. The League is a "big picture" organization, working to protect whole watersheds, including the air and water quality, the fish and wildlife habitat, and advocating for proper management of our soils, air, woods, waters, and wildlife. The McCabe Chapter is located in Duluth and the environmental quality of Lake Superior and the St. Louis River estuary have long been a high priority for us.

We applaud the MPCA for developing a strategy to address PFAs in biosolids and for getting ahead of the U.S EPA's risk assessment, expected by the end of the year. The strategy is an important step towards addressing the widespread pollution resulting from the use of PFAs in many products. We appreciate the emphasis on source reduction and pollution prevention, which are the only real solutions to this problem.

Our primary concern with the strategy is the proposed frequency of testing – once per year for all wastewater treatment plants (WWTPs). Wastewater plants vary greatly in size, nature of their influent and industrial contributors, pretreatment programs, and how much biosolids they land apply. A "one size fits all" approach is not appropriate and unlikely to produce an accurate picture of the problem. One annual sample might be adequate for a WWTP that does not have many industrial contributors and land applies infrequently, but a plant that has an ongoing land application program, such as the Western Lake Superior Sanitary District here in Duluth, should have to meet a higher standard. Sampling requirements based on the size of the plant and the frequency of land application are more appropriate. Some additional guidance for what constitutes a representative sample is also needed, as wastewater influent can vary considerably depending on the time of year and the seasonal activity of its industrial customers.

We also wonder how aware farmers considering land application are of the potential risk associated with PFAs in biosolids. We appreciate the requirement to notify farmers and landowners if testing indicates elevated levels of PFAs, but would suggest MPCA consider an educational piece could be made available to farmers as they are making the decision about use of biosolids.