

Lori Olinger

Comments are attached.



# SIERRA CLUB

## NORTH STAR CHAPTER

**North Star Chapter**  
2300 Myrtle Ave, Suite 260  
St Paul, MN 55114

December 9, 2024

Minnesota Pollution Control Agency  
520 Lafayette Road  
St Paul, MN 55155

RE: PFAS in Biosolids Strategy

Thank you for the opportunity to comment on the PFAS in Biosolids Strategy. I am submitting comments on behalf of Sierra Club North Star Chapter.

Comments are as follows:

- **Timeline**  
It is good that all WWTFs that land apply any biosolids must begin testing in September 2025.
- **Sampling**  
Method 1633 includes results for 40 analytes for bio-solids. The testing should include all PFAS detected and not just PFOA and PFOS. Since long-chain PFOA and PFOS were phased out twenty years ago, the testing should also include the replacement analytes.
- **Background**  
“While some PFAS compounds are linked to health impacts, the potential human health risk of PFAS exposure due to biosolids land application is not clearly known nor are there any state or federal regulations pertaining to PFAS and biosolids.”
  - This statement is not accurate since Maine, Connecticut, and Michigan all have biosolid regulations.
    - Maine bans land-application and distribution of biosolids based products.
    - Connecticut bans biosolids that contain PFAS.
    - Michigan has a tiered system like the MPCA strategy however, it is more stringent.
- **Response Actions**
  - Lower concentrations levels for Tier 4 from  $\geq 125$  to 100 micrograms/kilogram.
  - Reduce land application from 3 to 1.5 dry tons per acre or provide an alternative risk mitigation strategy to MPCA a minimum of 14 days prior to land application for Tier 2.
  - Source identification and reduction work should be added to Tier 2.



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- Notification to the landowner and farmer (if different than the landowner) and the MPCA should be required for Tier 1.
- **Exceptional Quality (EQ) Biosolids**  
EQ biosolids should be tested for 40 analytes rather than just PFOS and PFOA. Results of 'no detection of PFAS' or 'PFAS <= 20' should be indicated on the package so that customers are informed.

Sincerely,

Lori Olinger  
Co-Chair, Zero Waste Task Force  
Sierra Club North Star Chapter