

*Dear Town Manager, Select Board Member, and/or State Senator or Representative [insert name],
[send to whomever you feel is most appropriate or most likely to take action]*

This letter is to inform you about the financial impacts to our *[town/municipal]* budget of potential new regulations that could affect our wastewater treatment facility. Initiatives by the Vermont Legislature and/or US Environmental Protection Agency (EPA) may have significant impacts on our wastewater treatment operations and costs in the near future. These include:

PFAS — known as “forever chemicals,” these are a class of man-made compounds that are used in consumer products, industrial applications, firefighting foam, and more. They have been linked to cancer and other health effects in humans. They do not break down naturally and are found in water, wastewater, and ecosystems around the world due to decades of widespread use.

There have been efforts in recent years to regulate PFAS in drinking water, and this will likely expand to wastewater as well. PFAS are found in wastewater because products containing these chemicals are used in homes and businesses within our community. Our treatment facility is not engineered to remove PFAS from wastewater. This means that treated water leaving our facility will still have the PFAS compounds it contained when it arrived, and these chemicals will enter our local waterways.

Biosolids — these are the solid materials (fecal matter, food waste, etc.) that are separated from liquid during the wastewater treatment process. Because they are organic matter that contain high levels of nutrients like nitrogen and phosphorus, they have often been used as fertilizer on farm fields where animal feed crops are grown. This “beneficial reuse” is becoming less common as there are growing concerns about PFAS in biosolids.

If biosolids are not used as fertilizer, the only other options to dispose of them are through incineration or landfilling. There are no incinerators for biosolids in Vermont, and the state’s only landfill has limited capacity remaining. Thus, biosolids will likely need to be transported out-of-state for disposal in the near future.

Cost — if new state or federal regulations limit the level of PFAS in water discharged from treatment facilities, our facility would need a very expensive upgrade in order to be able to remove PFAS. If new regulations were to prohibit biosolids from being used as fertilizer, the cost of their disposal could rise dramatically. If either such regulations are enacted, the increased costs will likely be passed along to our customers: residents and businesses in our community.

We hope state legislators will consider the cost to local communities when drafting regulations that impact wastewater facilities. Laws that prohibit sale and distribution of some sources of PFAS, including food packaging, rugs and carpets, and ski wax, have been enacted in Vermont and should continue to be supported. Ideally, the manufacturers of PFAS would be held accountable for the cost of monitoring, treatment, and disposal of these chemicals.

Our local wastewater treatment facility is essential to protecting public health, improving water quality and the environment, and providing economic opportunity and quality of life in our community. We want to be proactive in addressing new concerns like PFAS and biosolids. Please reach out to our chief operator, *[insert name and contact information]*, if you would like to discuss these issues further.