House Republican Policy Committee

10/15/2026, 10:00 a.m., Mount Aloysius College, 7373 Admiral Peary Hwy, Cresson

Zoe Buchmann, Pennsylvania Legislative Services

The committee held a public hearing entitled: “The Impact of New Department of Environmental Protection (DEP) Requirements.”

John McKeegan, J.D., president, Mount Aloysius College, welcomed the House Republican Policy Committee to Mount Aloysius College and described its mission of meeting individual and community needs through quality educational programs. He noted that approximately 85% of the college’s students are from Pennsylvania and three-quarters remain in the state after graduation. He highlighted partnerships with health care systems, businesses and other organizations, as well as state funding through the Redevelopment Assistance Capital Program (RACP) and Local Share Account (LSA) grants. McKeegan thanked the committee for their support, noting the college’s expansion into DuBois and its programs in nursing, surgical technology, medical imaging, business, cybersecurity, information technology and education. He emphasized the college’s commitment to career success and personal fulfillment and thanked the committee for visiting.

Chair David Rowe (R-Union) thanked Mount Aloysius College for hosting the hearing and credited Rep. Jim Rigby (R-Cambria) with bringing the issue forward, emphasizing his commitment to his constituents and his efforts to address challenges facing local communities. He explained that the hearing would focus on wastewater treatment and biosolids management, an issue affecting every community. He noted that properly managed biosolids can return nutrients to the soil and help farmers reduce fertilizer costs. He referenced DEP permit changes requiring testing for two per- and polyfluoroalkyl substances (PFAS) chemicals and reduction plans when concentrations exceed specified thresholds, with the stated goal of protecting crops and groundwater. Chair Rowe outlined the committee’s questions about how the requirements would be implemented, their costs and whether they could restrict land application. He raised concerns about whether alternative disposal methods would have sufficient capacity and how additional costs might affect families, employers and farmers. He emphasized that environmental protection and public health must be balanced with scientifically grounded requirements and practical, affordable compliance options. He described the policy committee’s role in gathering information directly from communities across Pennsylvania, understanding their distinct challenges and bringing those perspectives back to Harrisburg to inform policymaking. He thanked the testifiers for sharing their firsthand experience with wastewater treatment, biosolids management and the costs of these services.

Rep. Rigby thanked Chair Rowe, the policy committee members, Mount Aloysius College and the testifiers for participating in the hearing. He noted that families and businesses across Pennsylvania are facing rising costs and that wastewater treatment has become an

additional financial burden. He explained that aging infrastructure, increasingly stringent regulations and unfunded mandates are raising costs for wastewater systems, placing the burden on ratepayers. He highlighted the financial pressures municipalities and residents already face under Pennsylvania's municipal separate storm sewer system program, which requires communities to manage stormwater runoff and reduce pollution. He warned that additional wastewater permitting requirements and proposed restrictions on biosolids management could further increase costs by limiting disposal and reuse options and raising transportation, treatment and infrastructure expenses. He said these costs are ultimately passed on to residents and businesses through higher sewer bills. He stressed that clean water and environmental protection are important but questioned whether additional regulations would provide environmental benefits sufficient to justify their costs, particularly as families struggle with rising expenses. He highlighted that environmental protection and affordability should remain compatible priorities. He described the hearing as an opportunity to assess the financial and environmental effects of the requirements and identify practical ways to protect waterways without imposing unreasonable costs on Pennsylvania ratepayers.

Julia Galliker, executive vice president, Galliker Dairy Company, acknowledged that she was unfamiliar with giving testimony and noted that she will focus on the company's regional economic impact, the effects of proposed biosolids permit changes on dairy farmers and the role of wastewater treatment facilities in monitoring and reducing PFAS. She described Galliker Dairy as a growing, family-owned business with approximately $150 million in annual business and 300 employees. She noted that the company was in its 112th year of operation and that she and her husband represented the fourth generation of family leadership. She emphasized the company's commitment to maintaining local jobs, investing in future leadership and supporting the regional economy. She added that 69 employees have close family members who also work for the company. She explained that the company is contractually obligated to purchase all milk produced by 65 family farms throughout Central Pennsylvania, providing those farms with a stable market. She described Pennsylvania's dairy industry as growing and highlighted the state's resources and opportunities for further expansion. She outlined the company's product lines, including milk, juice, beverages, cultured products, soft-serve mix and ice cream. She noted that her company distributes products across seven states through its own fleet and 15 depots in four states.

Turning to biosolids management, Galliker said she had consulted with dairy farmers, the State Farm Bureau and Pennsylvania State University's agricultural extension service. She reported that, to her knowledge, wastewater treatment biosolids in her immediate area are sent to landfills, while dairy farmers primarily use manure from their own operations as fertilizer. She explained that her company uses between four million and six million gallons of water per month and separates its processing biosolids before they enter the wastewater stream, sending them to farms for use in manure pits. She encouraged greater attention to biodigesters in western and central Pennsylvania as a potential means of managing food waste and improving business sustainability. She then raised concerns

about municipal sewage rate increases affecting her company. She reported that the local sewage authority implemented a 50% increase in nonresidential rates on June 1 without notifying or consulting commercial ratepayers, following a 56% increase in 2023. She said the authority's new rate schedule included additional increases in 2028, 2029 and 2030, which would bring total rates to 217% above 2022 levels. She added that the rate structure was introduced without a cost-of-service study for commercial users with their own wastewater treatment facilities, despite an earlier commission study costing $35,000. She explained that the company relies on the municipal sewage authority because its location on a hilltop prevents convenient discharge into a river, even though it operates its own wastewater treatment plant. She expressed concern about the limited oversight of municipal authorities and the discretion they have in setting rates. She estimated that the rate increases would cost Galliker Dairy an additional $1.5 million in fees. She anticipated spending potentially another $1.5 million on pressure testing and remediation requirements that she said were not suited to the company's purpose-built commercial facility. She argued that if DEP uses municipal authorities to implement environmental requirements, appropriate oversight and remedies for affected businesses would be necessary.

Jill Whitcomb, deputy secretary, Office of Water Programs, DEP, outlined her background in agricultural nutrient management and regulatory compliance, including work with concentrated animal feeding operations, concentrated animal operations, small farms and dairy operations. She explained that her work has focused on helping farmers make informed decisions about land application while protecting water quality. She acknowledged that biosolids can provide nutrients and organic matter while offering farmers a less expensive alternative to conventional fertilizers. She explained that DEP's existing general permits for biosolids land application had been in place since 2009 and were administratively extended rather than reissued. She said DEP began considering updated permits in 2021, initially focusing on monitoring PFAS in wastewater streams. She said DEP established a data-gathering team in January 2025 and spent six months reviewing available research with the Pennsylvania State University (Penn State), Department of Agriculture (PDA), Mid-Atlantic Biosolids Association and other stakeholders. She noted that DEP also reviewed the Environmental Protection Agency's (EPA) risk assessment and consulted other states. Although Maine had banned land application of biosolids, she said DEP did not want to pursue that approach because land application benefits farmers, wastewater treatment plants and communities.

Whitcomb described four areas addressed in the proposed permit revisions, including PFAS monitoring and reduction plans, phosphorus management, biosolids storage and stacking requirements, and the use of biodigesters. She explained that Pennsylvania's phosphorus index has been used since 2005 to manage phosphorus applications from animal manure but had not previously been incorporated into biosolids land application requirements. She welcomed Galliker's comments about biodigesters and explained that DEP was proposing to streamline permitting for wastewater treatment plants that use or plan to build digesters. She continued that, under the proposed general permits, facilities

could bring food-processing residuals into digesters and blend them with biosolids without obtaining a separate permit. She said the approach could support waste treatment, energy production and heating while generating additional revenue. She reported that DEP published the proposed permits for public comment on July 4 for a 60-day period and received approximately 545 comments. She said the feedback ranged from calls for a complete ban to requests to withdraw the proposals and restart the process. She emphasized that the revisions were intended to modernize requirements and prevent biosolids from other states from being applied to Pennsylvania farmland when their use was restricted in those states.

Peter Price, technical services director, Synagro, described Synagro as the nation's largest recycler of residuals and said the company supports publicly owned water and wastewater infrastructure throughout Pennsylvania. He argued that the proposed biosolids permit revisions would increase costs for municipal wastewater systems, businesses and residents by restricting land application and forcing more biosolids into landfills. He warned that Pennsylvania's landfill capacity was insufficient to accommodate the full volume of biosolids currently land-applied, potentially requiring costly transportation to other states. He referenced HR 149, sponsored by Rep. Rigby in 2021, which directed the Legislative Budget and Finance Committee (LBFC) to examine the costs municipalities would face under proposed permit changes. He criticized DEP's earlier objection that the study was premature and argued that using general permits rather than formal rulemaking bypassed meaningful legislative review and cost analysis. He noted that the committee's 2023 report estimated that surveyed facilities expected sewer rates to increase by 2% to 25% under the earlier proposal. He contended that the revised permits differed from the earlier proposals and the Pennsylvania Code without requiring the cost-benefit analysis and regulatory review associated with formal rulemaking. He disputed the comparison between biosolids and animal manure, arguing that the phosphorus index was designed for manure management and had not been established as a regulatory limit on biosolids applications. He warned that applying the index in this way could substantially reduce the number of applications farms could receive and undermine the economic viability of biosolids recycling.

Price explained that biosolids are produced continuously but can only be applied when weather, soil and crop conditions permit. He said farmers therefore need storage facilities, which can cost between $60,000 and $80,000 each. If permit restrictions reduced the number of applications farms could accept, he argued, farmers would have less incentive to make these investments and biosolids would increasingly be sent to landfills. He estimated that Pennsylvania land-applies approximately 760,000 tons of biosolids annually, while landfills could absorb only about 285,000 tons even if biosolids accounted for 5% of their total intake. He reported average costs of approximately $50 per wet ton for land application and $80 for landfilling, with landfill fees in eastern Pennsylvania reaching approximately $135 per ton. He added that these figures excluded transportation costs and said biosolids management can account for 30% or more of a utility's operating budget. He cited a study estimating that shifting biosolids from land application to landfills

could generate approximately 260,000 metric tons of greenhouse gas emissions annually. He argued that individual permits were a slower and more expensive alternative to general permits, with approval timelines previously measured in years. He maintained that the proposed changes would effectively impose regulatory requirements without independent regulatory review, cost-benefit analysis or legislative oversight.

Price asked the committee to request an explanation from DEP for adopting the requirements through permit conditions rather than legislative directives. He urged lawmakers to require an updated cost analysis covering ratepayers, landfill capacity, transportation to out-of-state facilities and additional emissions. Finally, he recommended legislation requiring permit conditions with regulatory force to undergo review under the Regulatory Review Act. He concluded that Pennsylvania could protect water resources while maintaining affordability if the costs and practical consequences were properly assessed.

Andrew Moore, director of plant operations, Lehigh County Authority (LCA), testified on behalf of both LCA and the Pennsylvania Municipal Authorities Association (PMAA). He explained that PMAA represents nearly 700 municipal authorities providing water, sewer, stormwater, waste management and other services to more than five million Pennsylvanians. He said PMAA had established a biosolids work group, participated in DEP's stakeholder process and adopted a 2025 resolution supporting land application and regulatory oversight of permit revisions consistent with the recommendations of LBFC. He emphasized that PMAA supported protecting public health and the environment through sound science. He argued that proposed permit revisions should undergo technical evaluation, cost-benefit analysis and review by legislative committees and the Independent Regulatory Review Commission (IRRC). He cited House Resolution 149 and the committee's 2023 report, which warned that permit changes could produce unintended consequences and higher costs for ratepayers.

Turning to LCA's operations, Moore announced that the authority was changing its name to LCA Waterworks. He explained that LCA operates Allentown's wastewater treatment plant and five other facilities, treating approximately 32 million gallons of wastewater daily and serving more than 270,000 people. He warned that the proposed revisions could significantly reduce or eliminate land application, shifting biosolids to landfills instead. He said LCA had experienced landfill disposal costs as much as five times higher than land application and noted that eastern Pennsylvania faced additional challenges due to limited agricultural land, high population density and constrained landfill capacity. He expressed support for responsible phosphorus management but argued that the phosphorus index was developed as a planning and risk-assessment tool rather than a regulatory mechanism for biosolids application rates. He said DEP had not demonstrated that applying the index to biosolids would measurably reduce phosphorus loading in surface waters. He warned that the proposed requirements could reduce farmers' access to low-cost fertilizer, increase sewer bills and divert more biosolids to landfills. He acknowledged public concern about PFAS and supported efforts to better understand its

presence and movement through the environment. However, he raised concerns about the proposed monitoring requirements and tier system, noting that only a limited number of accredited laboratories could conduct the necessary analyses. He said this could create scheduling difficulties and increase testing costs for wastewater treatment plants. He emphasized that wastewater treatment plants do not manufacture or use PFAS in their treatment processes but instead receive it from industrial, commercial and consumer sources. He warned that the proposed requirements could shift responsibility and liability from the entities generating PFAS-containing waste to wastewater treatment plants, with compliance and disposal costs ultimately passed on to ratepayers.

John Larson, director, Chalfont New Britain Township Joint Sewer Authority, explained that the authority serves approximately 17,000 residents in Chalfont Borough and New Britain Township and treats wastewater for approximately 5,000 additional customers through Bucks County Water and Sewer. He described the facility as a small-to-mid-sized plant in eastern Pennsylvania that had used biosolids land application for approximately 25 to 30 years. He warned that the proposed permit changes could dramatically increase disposal costs. He estimated that trucking and disposal costs could rise by as much as 300% for some facilities and potentially 3,000% for facilities currently relying on free land application. He said these expenses would ultimately be passed on to residents and could also increase costs across the broader waste management system. He questioned how Pennsylvania would manage its biosolids if land application were restricted, noting that existing studies suggested the state lacked sufficient landfill capacity. He raised concerns about proposed farm storage requirements, explaining that biosolids must be stored when weather and crop conditions prevent land application. He argued that farmers would be unlikely to invest $50,000 to $100,000 in storage structures if regulatory restrictions made biosolids use economically unattractive.

Larson disputed the proposed use of the phosphorus index for biosolids, citing studies suggesting it could eliminate 50% to 70% of current application sites. He said there was insufficient evidence that applying the index to biosolids would produce the same environmental outcomes as its use for animal manure. He objected to incorporating the index into permits because changes made by Penn State could effectively alter permit requirements without the public comment and legislative review associated with formal regulatory changes. He questioned whether the scientific evidence justified moving forward with the proposed restrictions, citing concerns raised about the EPA's 2020 biosolids risk assessment. He explained that he supported addressing PFAS but recommended a monitoring period to establish reliable data on concentrations and potential risks before imposing restrictions. He urged the committee to support further research into environmental effects, disposal capacity and the costs to ratepayers before DEP finalized the permits. He argued that the proposed changes should undergo formal legislative and regulatory review rather than being implemented through general permits. He explained that wastewater treatment plants are passive receivers of PFAS and generally have limited control over contamination entering their systems. He said industrial users were more likely sources of elevated PFAS levels. He argued that manufacturers and other

entities still using PFAS should bear more of the responsibility for managing the contamination. He cautioned that higher compliance costs could affect business decisions about where companies locate, create jobs and continue operating. He added that policymakers needed to consider the interconnected effects on wastewater authorities, businesses, farmers and residents when determining how biosolids should be managed.

Ned Lang, president, Pennsylvania Septage Management Association, explained that the association's members install, inspect, service and maintain septic systems throughout Pennsylvania and work with farmers and landowners to recycle treated biosolids through land application. He thanked Chair Rowe for holding the hearing and praised Rep. Rigby for raising concerns about regulatory changes that could increase consumer costs. He identified insufficient information about PFAS exposure and risk, increased consumer costs if land application becomes unavailable and negative effects on agriculture from losing a source of nutrients and organic matter as the main issues. He argued that PFAS requirements should be based on measured concentrations and demonstrated risks. He explained that PFAS enter wastewater through everyday products, including food packaging, carpets, clothing and cosmetics, and that wastewater operators are passive receivers rather than manufacturers of these chemicals. He referenced an industry fact sheet comparing reported PFAS concentrations in biosolids with those in certain consumer products, while acknowledging that figures from different studies did not directly establish exposure levels or health risks.

Lang said the association supported protecting public health but urged DEP to prioritize reducing PFAS at the source and collecting reliable data before imposing restrictions. He recommended a two-year monitoring program to evaluate Pennsylvania data alongside federal findings. He questioned whether landfill disposal would meaningfully reduce exposure, arguing that it could simply relocate the material without destroying PFAS. He warned that restricting land application would create significant disposal challenges. He cited estimates that Pennsylvania recycles approximately 762,000 tons of biosolids annually and that eliminating land application could leave approximately 476,000 wet tons without an available in-state management option under the assumptions used in the industry fact sheet. He said higher landfill fees, longer transportation distances and additional storage or treatment costs would ultimately affect taxpayers. He cited the fact sheet's estimate that Maine's land application ban increased management costs by an average of 175%. He urged DEP to apply its environmental justice principles to the proposed permit changes by considering the effects of higher sewer bills, additional truck traffic and alternative disposal facilities on affected communities. He emphasized that low-income households and people on fixed incomes would have less ability to absorb increased costs. He warned that transporting biosolids over longer distances could increase fuel use and greenhouse gas emissions. He argued that farmers would lose access to a valuable resource if biosolids land application were restricted. He explained that properly managed biosolids provide nutrients and organic matter, improve soil health

and reduce fertilizer expenses. He called for practical, clearly justified and consistently enforced application and storage requirements.

Lang outlined four recommendations from the association: establish a two-year PFAS monitoring program before imposing restrictive limits, reduce PFAS at the source through industrial and commercial controls and research, develop a realistic disposal and transition plan that evaluates capacity and economic and environmental effects, and subject major new requirements to formal rulemaking with public input, cost-benefit analysis and independent and legislative review. He added that the association was concerned about the potential effects on septic waste disposal. He explained that many members transport septage from septic systems to wastewater treatment plants. He estimated that 42% of Pennsylvanians rely on on-lot septic systems and warned that restrictions could leave operators without practical alternatives. He thanked the committee for the opportunity to testify.

Chair Rowe asked Whitcomb whether DEP had conducted a cost-benefit analysis of the proposed permit revisions, considering their potential impact on municipalities, businesses and taxpayers. Whitcomb acknowledged that DEP had not completed a fiscal analysis, explaining that the department had requested specific cost data from the regulated community but had not received enough information to assess the potential impacts. She added that the proposed phosphorus index requirements would apply only to farms in agriculturally impaired watersheds that meet certain thresholds and would not automatically prohibit biosolids application. Chair Rowe asked Galliker whether she had observed other states adopting more business-friendly approaches to biosolids management. Galliker said the issue remained in its early stages among the dairy companies and industry organizations she consulted. She noted that Pennsylvania's dairy industry had growth opportunities because the state's climate offered advantages over warmer regions, where dairy farming had declined. She said the proposed changes had prompted her company to consider long-term sustainability investments.

Rep. Dallas Kephart (R-Clearfield) described concerns about biosolids land application near waterways used for drinking water, including a location near a municipal water authority's wells. He argued that applying material potentially containing PFAS near a drinking water source warranted caution and asked Whitcomb whether DEP could account for differences between rural reclaimed mine land and sites near waterways. Whitcomb agreed that the example illustrated the uncertainty surrounding biosolids composition. She explained that DEP could not require monitoring without permit conditions mandating it and said the department had struggled to obtain voluntary participation in its sampling program. She added that DEP needed to establish requirements to improve understanding of what was present in wastewater streams. Rep. Kephart acknowledged the potential benefits of biosolids for reclaiming abandoned mine land and improving soil conditions but cautioned against an all-or-nothing approach. He encouraged DEP to consider stakeholder feedback and use a formal regulatory process. He raised concerns about wastewater authorities being held responsible for PFAS contamination they did not cause, arguing that

smaller authorities could struggle to afford cleanup costs. Price responded that wastewater infrastructure must continue operating regardless of contamination concerns. He argued that reducing PFAS at its source should be the primary focus, noting that the chemicals enter wastewater through products used in homes and businesses. Moore added that water and wastewater utilities had sought legislative exemptions from liability for PFAS contamination because they often serve as passive receivers of chemicals introduced by manufacturers and other users. He noted that the federal pretreatment program includes monitoring requirements for certain industrial wastewater sources, including paper mills. Rep. Kephart cited the legislature's previous work on food processing residuals and encouraged DEP to incorporate public feedback into its decisions. He argued that the legislature should have a role in addressing the issue and that formal rulemaking would provide an opportunity for accountability and public input.

Rep. Rigby asked Galliker how the sewage rate increases affected her company financially and what additional costs it anticipated over the next five years. Galliker said the company faced a 50% increase in 2026 following a 56% increase in 2023, with further increases projected for 2028 through 2030. She estimated that the cumulative additional sewage costs would reach $1.5 million by 2030. She said regulated dairy prices limited the company's ability to pass those expenses on to consumers. She estimated that pressure testing its sewer lines could cost approximately $1 million, despite concerns that the work might not produce meaningful benefits. She added that the increases had prompted the company to explore water reuse and conservation technologies. Rep. Rigby noted that Galliker Dairy's extensive facilities and continuous production schedule could make pressure testing and sewer line repairs difficult. He asked whether the requirement came from the state or local authorities. Larson said he was unaware of a DEP regulation requiring pressure testing. He explained that authorities generally seek to reduce groundwater infiltration into sewer systems because it increases treatment costs and can contribute to overflows during heavy rainfall. He continued that his authority typically uses inspections and flow data to identify potential problems rather than requiring pressure testing across the board. He added that he would not automatically require pressure testing at a facility like Galliker Dairy unless there were evidence of an infiltration problem, noting that sewer lines beneath buildings are generally less exposed to groundwater. Galliker confirmed that her company operated approximately 20 hours per day, six days a week, with limited downtime for maintenance. She said digging up the facility's extensive network of drains would be impractical and questioned the effectiveness of pressure testing as a blanket requirement.

Rep. Andrea Verobish (R-Blair) asked whether the proposed permit changes would require additional capital investments from municipal authorities. Larson said utilities would likely face substantial capital and operating costs if they adopted technologies to treat PFAS. He described a gasification system being installed at Derry Township Municipal Authority that utilities were monitoring to determine whether it could perform as expected at full scale. He explained that treatment technologies could cost millions or tens of millions of dollars, with additional expenses for energy and ongoing operations. Rep. Verobish asked how

costs might differ between large and small authorities. Larson replied that costs would depend on system size, but smaller authorities could not necessarily scale equipment down proportionately. He estimated that the equipment for Derry Township's system had cost $8 million to $10 million, with another $8 million to $10 million potentially needed for installation and associated structures. He said he had not conducted a cost analysis to determine how expenses would vary by system size. Whitcomb identified the Clean Water and Drinking Water State Revolving Funds, administered through the Pennsylvania Infrastructure Investment Authority (PENNVEST), as potential funding sources. She said funding was available through low-interest loans and other assistance, although it might not be sufficient to cover all anticipated needs. Rep. Verobish cautioned that previous federal funding had helped municipalities finance infrastructure improvements but might not be available at the same level in the future. Larson added that PENNVEST could help with capital expenses, but ongoing energy costs and debt service would still affect operating budgets and could ultimately be passed on to ratepayers.

Chair Rowe asked Lang whether the proposed regulations would affect small businesses that collect and transport residential septage. Lang said two industry studies had estimated that proposed requirements could double or triple the costs of septic tank pumping. He warned that higher costs could lead homeowners to delay maintenance, increasing the risk of septic system failures and pollution. He explained that septage haulers and biosolids management companies generally handle waste generated by others, meaning increased disposal costs would ultimately affect consumers. He warned that wastewater treatment plants could stop accepting septage if they were concerned about PFAS, leaving haulers with fewer disposal options. He supported using biosolids to provide nutrients for agriculture and said he used them on his own farm. Chair Rowe then asked Whitcomb whether diverting biosolids away from land application could shift environmental risks to landfills and create future remediation costs. Whitcomb said she could not speak directly to landfill-related risks but emphasized that DEP intended to improve biosolids management incrementally as more information became available. She noted that LBFC's report had identified uncertainties and recommended formal rulemaking, while also recognizing DEP's authority to establish permit requirements. She said available sampling data showed that most biosolids samples had relatively low PFAS levels, with only a small number exceeding 100. She added that the phosphorus index would affect certain farms rather than all land application sites statewide. Larson added that reduced biosolids application rates above 20 parts per billion of PFAS could make land application impractical even when technically permitted. He explained that available spreading equipment could not accommodate the reduced rates and that the remaining nitrogen would provide insufficient value to farmers, potentially leaving landfill disposal as the only viable option.

Rep. Rigby asked the panel whether municipalities, businesses and homeowners could be told how much the proposed regulations would cost and what measurable environmental benefits they would provide. Larson estimated that his authority's current biosolids trucking and disposal costs could increase tenfold if it switched to landfills in southeastern

Pennsylvania. He said costs could rise by 3,000% to 4,000% if landfill prices increased and longer transportation distances became necessary. Moore said future costs were difficult to predict but estimated that landfill disposal could cost five times the authority's current disposal expenses, excluding additional fuel and vehicle maintenance costs. Price answered that the financial impact would depend on landfill capacity, competition for disposal space and transportation costs. He noted that landfills were not obligated to accept biosolids and could stop accepting them at any time. He questioned whether the proposed restrictions would deliver measurable environmental benefits, arguing that further research was needed on PFAS risks and that the phosphorus index was designed for animal manure rather than biosolids.

Rep. Rigby asked whether PFAS in biosolids would eventually reach waterways if the material were sent to landfills instead. Larson said landfill leachate could contain PFAS and was often transported to wastewater treatment plants for processing. He argued that landfilling biosolids could therefore shift the contamination rather than eliminate it. Whitcomb said the environmental costs of past land application could extend beyond disposal expenses, citing concerns about farms where historical biosolids application may have contributed to PFAS contamination of nearby drinking water. She noted that affected farmers could face difficulties growing crops or maintaining their livelihoods. Whitcomb agreed that reducing PFAS at its source was important but said DEP lacked the authority to address source reduction directly. She said the department's goal was to mitigate and manage contamination based on available information. Lang called for additional studies to identify wastewater treatment plants with PFAS contamination and direct their biosolids to facilities equipped to manage it. He argued that applying uniform restrictions across the Commonwealth without identifying contamination sources could impose unnecessary costs on the septage industry and consumers. He requested two years of monitoring, source reduction, a reliable disposal and transition plan and formal rulemaking with legislative involvement. Rep. Rigby asked Whitcomb whether DEP could provide the committee with written estimates of annual costs per residential customer, compliance costs for authorities and quantified environmental benefits for each of the three proposed permits. Whitcomb agreed to investigate further, acknowledging that DEP could not yet provide definitive cost estimates because of the many variables involved. She said DEP would examine current biosolids application locations and assess how the phosphorus index might affect specific farms and fields. She added that the department would need time to determine whether the proposed phosphorus management requirements would meaningfully affect those sites.

Chair Rowe emphasized the need for a practical approach to managing wastewater materials. He said that if the proposed regulations limited land application, the state needed to understand where the material would go, whether alternative disposal facilities had sufficient capacity and how additional costs would affect businesses, farmers and ratepayers. He stressed that the committee needed a clear understanding of both the environmental benefits and financial consequences of the proposed changes before proceeding.