*Biosolids and PFAS - Sampling and Analysis Plan template*

Click or tap to enter a date.

Farmer Name/Landowner Name

Address

City, State, Zip code

RE: Biosolids Land Application Information and PFAS Results

WWTF Name is preparing to apply biosolids on land you own and/or farm. In 2024, the Minnesota Pollution Control Agency (MPCA) was directed by the 2023-2024 Minnesota (MN) Legislature to develop a strategy for testing PFAS in Biosolids intending to be land applied in Minnesota. As a result, the [Minnesota Biosolids PFAS Strategy](https://www.pca.state.mn.us/air-water-land-climate/pfas-in-biosolids-strategy) (Strategy) was developed. As part of the Strategy, starting September 1, 2025, all Wastewater Treatment Facilities (WWTFs) that land apply biosolids **must**: collect one biosolid sample per year, analyze it for per and poly-fluoroalkyl substances (PFAS), and share this information with the landowner and farmer, if different than the landowner. The intent of this letter is to provide background information on PFAS, examples of on-going PFAS work in Minnesota, nation-wide PFAS efforts, the test results for our biosolids, and PFAS contacts and resources.

**Background**

PFAS, a group of more than 5,000 human-made chemicals, have been used widely in industrial processes and in consumer products since the 1940s. PFAS are commonly found in firefighting foam, chrome plating, cookware coatings, waterproofing on clothing and carpet, food wrappers, and potentially agricultural products like pesticides. Some PFAS, including perflurooctanesulfonic acid (PFOS) and perfluorooctanoic acid (PFOA), which are commonly found in biosolids, have been phased out of production in the United States and are no longer approved for use. Even though they have not been produced in the United States for years, these PFAS are still found in products that are still in use or as legacy compounds at industrial facilities.

**Minnesota’s efforts**

WWTFs, like ours, do not generate or use PFAS to treat wastewater. Instead, PFAS is received through the collection system in wastewater discharged from industries, commercial businesses, and homes. Conventional wastewater treatment does not remove PFAS, and technologies to remove PFAS from wastewater are not currently affordable for municipalities. As a result, PFAS are often found in treated wastewater and biosolids.

The only way to reduce PFAS coming to our WWTF is to *reduce* the PFAS entering our treatment system. Finding and reducing, or eliminating, PFAS sources is referred to as *source identification and reduction work*. This work is encouraged by the MPCA. In 2022, 83 WWTFs throughout Minnesota voluntarily committed to efforts to identify and reduce PFAS coming into their facilities from commercial and industrial sources. Under the Strategy, more WWTFs will be doing this type of work. Starting in 2025, the Strategy requires that, in addition to this notification, WWTFs that land apply biosolids, will need to take actions to identify and reduce sources of PFAS depending on the concentration of PFAS in the biosolids. These activities take time and additional resources, but along with [PFAS product bans](https://www.pca.state.mn.us/air-water-land-climate/2025-pfas-prohibitions) like [*Amara’s Law*](https://www.revisor.mn.gov/statutes/cite/116.943#stat.116.943), are proven to effectively decrease PFAS.

**National efforts**

On a national level, the EPA, along with most states do not require PFAS testing. However, a handful of states have mandated it for several years. MPCA’s requirement to test began September 2025. The MPCA expects to see low levels of PFAS in the majority of the biosolids in Minnesota based on other states’ efforts and studies. Human health risks and environmental impacts are being evaluated currently. Our understanding is that more information about PFAS is needed. Requiring PFAS sampling to measure concentrations of PFOS and PFOA in the biosolids helps to understand if biosolids contain elevated levels of PFAS. This is an important first step that WWTFs, like ours, are taking. While some PFAS compounds are linked to health impacts, the potential human health risk of PFAS exposure due to biosolids land application is not completely known nor are there any state or federal regulations pertaining to PFAS and biosolids. The MPCA will use the information learned from this effort, as well as additional sources of information, including the U.S. Environmental Protection Agency’s (EPA) draft Risk Assessment of Pollutants in Biosolids[[1]](#footnote-2), to help to inform future actions pertaining to biosolids and PFAS.

**Results**

Sampling, analysis and reporting of biosolids that are intended to be land applied are required once per cropping year. Analysis has recently been completed for our biosolids. Our most recent test results are analyzed using EPA Method 1633A and reported in parts per billion (ppb).

|  |  |  |  |
| --- | --- | --- | --- |
| Parameter | Value | Units | Date |
| PFOS |  | ppb |  |
| PFOA |  | ppb |  |

Presently, if either PFOS or PFOA in biosolids is greater than or equal to 125 ppb, the MPCA considers them industrially impacted and land application is prohibited. This is not a risk-based value, as one does not exist at this time, but an indication that the biosolids are industrially impacted. PFOA or PFOS concentrations under 125 ppb are still currently allowed to be land applied.

**Resources**

If you have questions about PFAS in the biosolids you’re considering applying to your land or what WWTF Name is doing to reduce PFAS, please contact Name of Facility contact at phone or email.

Should you have questions regarding PFAS in biosolids or what Minnesota is doing to reduce PFAS at WWTFs, please reach out to the MPCA at municipal.wastewater.pfas.mpca@state.mn.us. More information about the work being done on PFAS in Minnesota can be found on the MPCA’s website, [PFAS | Minnesota Pollution Control Agency](https://www.pca.state.mn.us/pollutants-and-contaminants/pfas).

Sincerely,

Name, Title

WWTF Name

Enclosure: List of enclosures, if any

1. [EPA's biosolids PFAS risk assessment webpage](https://www.epa.gov/biosolids/risk-assessment-pollutants-biosolids)

   [1] [Fact Sheet: Draft Sewage Sludge Risk Assessment for PFOA and PFOS: Information for Farmers](https://www.epa.gov/system/files/documents/2025-01/fact-sheet-farmers-draft-sewage-sludge-risk-assessment-pfoa-pfos.pdf) [↑](#footnote-ref-2)