



**OFFICE OF WATER**  
WASHINGTON, D.C. 20460

June 29, 2026

**DRAFT GUIDANCE MEMORANDUM**

**SUBJECT:** Draft Guidance for Reducing Risk from Perfluorooctanoic Acid (PFOA) and Perfluorooctane Sulfonic Acid (PFOS) in Biosolids

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This memorandum includes draft guidance that, if finalized, would provide recommendations that may be helpful to operators of wastewater treatment plants (WWTPs) and related facilities, landowners and farmers, state and Tribal water agencies, and the public. It provides voluntary recommendations for potential ways to mitigate risks from perfluorooctanoic acid (PFOA) and perfluorooctane sulfonic acid (PFOS) involving land application of biosolids.<sup>1</sup> The U.S. Environmental Protection Agency will solicit public comment on this draft guidance for 60 days following publication of a Notice in the Federal Register. The EPA also may use public comments filed to help inform any future agency actions.

**Background**

The EPA remains committed to addressing per- and polyfluoroalkyl substances (PFAS) in the environment as part of its work ensuring that all Americans can rely on clean air, land, and water. Under the first Trump Administration, the EPA issued the first-ever comprehensive, nationwide PFAS Action Plan.<sup>2</sup> Addressing PFAS contamination utilizing a science-based, legally defensible, and common-sense approach continues to be a priority for the agency under Administrator Zeldin’s leadership. This approach also incorporates a focus on robust communication and ensuring radical transparency in every step, with an ultimate goal of providing the public with the tools and information necessary to make informed decisions related to PFAS. The Administrator has announced a suite of

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<sup>1</sup> This guidance does not supersede existing federal law or regulations, nor does it supersede any state, Tribal, or local requirements for PFOA and PFOS in sewage sludge.

<sup>2</sup> See the [EPA’s Per- and Polyfluoroalkyl Substances \(PFAS\) Action Plan](#) (February 2019)

actions to address PFAS, including extending a previous public comment period on the agency's draft biosolids risk assessment and devising a path forward based on comments received by the agency.<sup>3</sup>

### What are Sewage Sludge and Biosolids?

When domestic sewage is transported and conveyed to a WWTP, it is treated to separate the liquids from the solids, which produces a semi-solid, nutrient-rich product known as sewage sludge. In some instances, industrial wastewater is also conveyed to a WWTP and combined with domestic sewage. The terms "biosolids" and "sewage sludge" are often used interchangeably by the public; however, the EPA typically uses the term "biosolids" to mean sewage sludge that is intended to be applied as a soil amendment or fertilizer and that has been treated to meet the requirements in the EPA's Clean Water Act regulations entitled, "Standards for the Use or Disposal of Sewage Sludge," found at [40 CFR Part 503](#) (Part 503).

The Part 503 regulations govern minimum requirements for sewage sludge quality, management practices, and monitoring and reporting applicable to the generation of sewage sludge from a treatment works treating domestic sewage and to the use or disposal of that sewage sludge by any person. These regulations ensure that sewage sludge meets federal requirements when it is: 1) land applied; 2) placed on a surface disposal site (e.g., sewage sludge-only landfills); or 3) fired in a sewage sludge incinerator. Land application is the spraying, spreading, incorporation, or injection of sewage sludge into or onto the land to either condition the soil or fertilize crops or vegetation grown in the soil. Under existing federal regulations, biosolids can be applied to agricultural lands, forests, tree farms, golf courses, turf farms, and other types of land. Biosolids can also be bagged and sold at stores to the public, generally to be used on lawns or in home gardens. Biosolids generally are not used on specialty crops, such as fresh produce, and generally are used on crops where edible parts are not in contact with the soil. Some states, Tribes, or counties also have additional rules around the use of sewage sludge and biosolids.

The EPA has endorsed and encouraged the land application of biosolids for decades.<sup>4</sup> The continued practice of using biosolids for fertilizer is critical for both WWTPs seeking to manage sewage sludge in a manner that has environmental benefits, and farmers who rely on biosolids for fertilizer. While the EPA estimates that biosolids are applied to less than 1% of America's farmland annually,<sup>5</sup> the agency recognizes that nearly 60% of sewage sludge is land applied as biosolids. Land application is therefore a crucial and cost-effective management option for our nation's utilities, especially in locations where landfill and incinerator capacity is limited. To be clear, only biosolids, which are treated prior to use,

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<sup>3</sup> See the EPA press release "[Administrator Zeldin Announces Major EPA Actions to Combat PFAS Contamination](#)"

<sup>4</sup> See the [EPA's Policy Promoting The Beneficial Use of Sewage Sludge](#) (June 1989)

<sup>5</sup> The United States Department of Agriculture (USDA) estimated that chemical fertilizers, lime, and other soil conditioners were applied to 237 million acres of US farmland (see [2022 Census of Agriculture, Table 46](#)). The EPA estimates that about 2.3 million dry metric tons (dmt) of sewage sludge is land applied annually (see a summary of the 2024 Biosolids Annual Reports available on the EPA's webpage [Basic Information about Sewage Sludge and Biosolids - Use and Disposal Statistics](#)). If all land applied sewage sludge was applied at just one dmt per acre (median application rate is about 3 dmt/acre) there would still only be enough sewage sludge generated annually to treat 2.3 million acres of agricultural land. If 237 million acres are fertilized using chemical, lime, or other soil conditioners, 2.3 million acres represents less than 1% of the total farmland using fertilizers.

can be land-applied on farm fields under specific circumstances. Untreated sewage sludge may not be land applied under existing federal regulations.

### What are PFOA and PFOS?

PFOA and PFOS are two chemicals in the larger class of PFAS. PFOA and PFOS persist in the environment for long periods of time and have been linked to a variety of significant adverse human health effects.<sup>6</sup> Domestic production and import of PFOA has been phased out in the United States by the companies participating in the 2010/2015 PFOA Stewardship Program. However, quantities of PFOA may be produced, imported, and used by companies not participating in the PFOA Stewardship Program and some uses of PFOS may be ongoing.<sup>7</sup> While statewide surveys<sup>8</sup> have found that PFOA and PFOS have been detected at varying levels in sewage sludge, it is important to note that not all sewage sludge has been found to have detectable or elevated levels of PFOA or PFOS.

### EPA's 2025 Draft Risk Assessment

In 2019, as part of the PFAS Action Plan, the Trump EPA announced the beginning stages of a risk assessment to evaluate potential harm to humans and the environment posed by sewage sludge contaminated with PFOA and PFOS.<sup>9</sup> On January 14, 2025, the Biden EPA released a draft risk assessment (Draft Risk Assessment) aimed at understanding *potential* risks (*i.e.*, the chance of harmful effects to humans) posed by PFOA and PFOS in sewage sludge.<sup>10</sup> The current administration then extended that comment period twice to allow interested parties additional time to thoroughly review and analyze the Draft Risk Assessment and provide feedback.<sup>11</sup>

After careful review of the comments provided by stakeholders, the EPA has determined that the Draft Risk Assessment exhibited a number of serious flaws that have caused confusion among the public and the regulated community. This confusion has resulted in a lack of clarity in how the public should consider and potentially apply the preliminary findings of the Draft Risk Assessment in their daily lives,

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<sup>6</sup> See [Human Health Toxicity Assessment for Perfluorooctanoic Acid \(PFOA\) and Related Salts](#) (April 2024) and [Human Health Toxicity Assessment for Perfluorooctane Sulfonic Acid \(PFOS\) and Related Salts](#) (April 2024)

<sup>7</sup> There has been no information reported on PFOS uses in recent years to the EPA under the Toxic Substances Control Act (TSCA) Chemical Data Reporting Rule, which is the primary source of information the EPA relies on to ascertain ongoing uses of chemicals. For more information, see the EPA's webpage [Risk Management for Per- and Polyfluoroalkyl Substances \(PFAS\) under TSCA](#).

<sup>8</sup> As part of the Draft Sewage Sludge Risk Assessment for PFOA and PFOS, the EPA compiled and presented concentration data from published peer-reviewed literature and state reports that were available as of January 2024 (see Footnote 11 – Appendix A). State surveys were available from Maine, Michigan, Minnesota, Vermont, Connecticut, New Hampshire, and California. Since 2024, Hawaii, Delaware, Colorado, Washington, North Carolina, North Dakota, and Massachusetts have also published data on PFAS in sewage sludge.

<sup>9</sup> See *supra* 2

<sup>10</sup> See EPA-HQ-OW-2024-0504. [DRAFT SEWAGE SLUDGE RISK ASSESSMENT FOR PERFLUOROCTANOIC ACID \(PFOA\) CASRN 335-67-1 AND PERFLUOROCTANE SULFONIC ACID \(PFOS\) CASRN 1763-23-1](#) (January 2025)

<sup>11</sup> See the notices [Two Actions Published by the Environmental Protection Agency With Comment Periods That Close February 24, 2025 and March 17, 2025](#) and [Draft Sewage Sludge Risk Assessment for Perfluorooctanoic Acid \(PFOA\) and Perfluorooctane Sulfonic Acid \(PFOS\); Extension of Comment Period](#)

or put another way, in how to determine what the findings of the Draft Risk Assessment might mean for them.

First, the EPA departed from typical agency practice by failing to conduct a national survey to document occurrence of PFOA and PFOS in sewage sludge. National sewage sludge surveys are helpful to determine the range of chemicals, in this case PFOA and PFOS, that are actually in biosolids and therefore the range of potential risks they pose. In the past, the EPA has conducted sewage sludge surveys<sup>12</sup> alongside risk assessments to help contextualize expected risks and inform future actions.

Second, the Draft Risk Assessment only evaluated sewage sludge management practices with higher potential for human health risk in hypothetical scenarios that do not reflect the majority of land application in the U.S. In these higher-risk hypothetical scenarios, the Draft Risk Assessment found that PFOA and PFOS in sewage sludge may contaminate soil, livestock, food crops, fish, and drinking water. However, the agency did not estimate how often these higher-risk scenarios occur in the U.S. Nor did the agency assess risks to the public, as the public often has a diversity of sources for their food and does not live on or near an impacted property.

Finally, the preliminary findings of the Draft Risk Assessment suggested that sometimes risks of adverse health effects were possible when using or disposing of sewage sludge containing 1 part per billion (ppb) of PFOA or PFOS. This concentration was only used as a starting concentration to determine *if* use or disposal would result in *any* unacceptable risk for the hypothetical circumstances presented. The use of 1 ppb was not intended to be interpreted as a “safe level” of PFOA or PFOS in sewage sludge in all circumstances.

Based on the hypothetical biosolids and sewage sludge use and disposal scenarios modeled and presented in the Draft Risk Assessment, a misconception has arisen that *all* biosolids and sewage sludge use and disposal practices will negatively affect the public. This stems from the agency’s focus on higher-risk scenarios, the lack of discussion about risks to the public, and the use of 1 ppb as the modeled concentration. This draft guidance aims to provide clarity to stakeholders about the more common potential risks from PFOA and PFOS and identify some potential practices that can be taken to reduce PFOA and PFOS exposures.

### **Current Management Practices and Examples**

Reuse of sewage sludge (rather than disposal in a landfill or incineration) is a viable option for treatment works and the agricultural community. It is often preferred by treatment works because it tends to be less costly and provides a benefit as a soil amendment. Reuse options include land application on agricultural lands, reclamation sites, home gardens, and other sites like golf courses, often through the sale of bulk or bagged products. Based on recent reports<sup>13</sup> submitted to the EPA, about 60% of all sewage sludge is land applied: 31.5% is applied to agricultural sites, 20% is sold to the

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<sup>12</sup> See the EPA’s webpage [Sewage Sludge Surveys](#)

<sup>13</sup> See a summary of the 2024 Biosolids Annual Reports available on the webpage [Basic Information about Sewage Sludge and Biosolids - Use and Disposal Statistics](#).

general public, 1% is applied to reclamation sites, and 7% is land applied to some other type of site like silviculture.

Land application of biosolids can take many forms. In some cases, a WWTP will purchase a tract of land for the purpose of regularly using or disposing of sewage sludge at this site. This utility-owned land may not be used to cultivate any crops (for example, a surface disposal site that had no crops grown and was maintained by mowing weed grasses)<sup>14</sup> or the land could be actively engaged in agriculture as rangeland or for growing crops.<sup>15</sup> In other cases, WWTPs will sell or give away sewage sludge to private landowners to use for agricultural or non-agricultural purposes. Examples of agricultural land application include use on fields growing wheat or energy crops. Examples of non-agricultural land application include adding sewage sludge to improve grass quality on a golf course or sports field. About 20% of all sewage sludge is sold directly to the public through soil products that are sold bagged or bulk in garden centers and hardware stores or otherwise distributed. These materials may be applied to homes and gardens, as well as parks, schools, and playgrounds.<sup>16</sup>

### **Existing Practices for Managing PFAS in Biosolids**

Several states have implemented or are implementing programs to reduce PFAS in sewage sludge and biosolids, and to support beneficial reuse, where appropriate. Some actions have been initiated by state legislatures, while others are spearheaded by state environmental agencies. Some approaches states have taken include source reduction and pretreatment programs, prohibitions on the land application of sewage sludge in certain areas, and permit monitoring requirements to better understand the extent of PFAS<sup>17</sup> in sewage sludge. These examples are presented to illustrate options that some states have considered and implemented, and they should not be interpreted as the EPA's endorsement of these actions.

#### Reducing PFAS loading from industrial dischargers:

Some states have taken action to reduce PFAS loading from industrial dischargers. For example, Michigan's Department of Environment, Great Lakes, and Energy (EGLE) has taken action to identify sources of PFAS to a sewershed, requiring reductions in PFAS discharged from industrial dischargers, and implementing additional requirements for some land applied sewage sludge as part of their wastewater permitting program. The state implemented a tiered approach using PFOS as an indicator compound with the goal of identifying and reducing significant sources of PFAS entering wastewater treatment systems. Michigan EGLE developed the concentrations for the tiers in 2018, noting that they were not derived using health-based endpoints (*e.g.*, an acceptable cancer rate in the population).

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<sup>14</sup> See [Garza-Rubalcava et al., 2026. Field-scale modeling of PFAS transport and transformation at a biosolids land disposal site, Journal of Hazardous Materials, 507, 141814](#)

<sup>15</sup> Colorado's biosolids land application trends indicates much of the land where biosolids were applied in the state is owned by the WWTP and used for agricultural purposes like rangeland or wheat cultivation. See [The National Biosolids Project, Colorado Summary \(2018\)](#).

<sup>16</sup> DC Water's program to distribute biosolids to community gardens, including community gardens in schools, and small fruit and vegetable farms. See "[Blooming Everywhere: Why You're Seeing More of DC Water's Bloom](#)"

<sup>17</sup> Though most existing state programs for PFAS in sewage sludge use PFOA and PFOS as indicator compounds, many programs require monitoring for more than just PFOA and PFOS, especially those that require the use of EPA Method 1633, which analyzes for dozens of PFAS.

Instead, these levels were designed to allow EGLE to identify the most significant dischargers of PFAS to their utilities and to implement a strategy for reducing loading of PFAS to sewage sludge. As part of their initial strategy, seven WWTPs in Michigan with industrial sources achieved up to a 99% reduction in PFOS sewage sludge concentrations through industrial pretreatment initiatives.<sup>18</sup>

Michigan's strategy has included periodically updating their requirements after additional monitoring and lowering the allowable concentrations of PFOS in biosolids. By 2026, land application was prohibited above 100 ppb PFOS, compared to 150 ppb in 2021.<sup>19</sup> Since 2018, several states, including Wisconsin, Minnesota, Colorado, Maryland, and Virginia, have adopted similar approaches utilizing tiered frameworks and implementing industrial pretreatment at some WWTPs to lower PFOA and PFOS in sewage sludge, though not always using the same concentrations or authorities to require action.<sup>20</sup> Some states are using the same tiers as Michigan while others are using lower concentrations when establishing tiers. Virginia, for example, recently approved legislation prohibiting land application if the concentration of either PFOA or PFOS exceeds 50 ppb, and after two years from program implementation, prohibits land application if the concentration of PFOA and PFOS combined exceeds 50 ppb.<sup>21</sup>

#### Monitoring requirements in permits:

To gather more information before requiring actions, several states have PFAS monitoring requirements. States like Washington,<sup>22</sup> Oregon,<sup>23</sup> and Florida<sup>24</sup> have enacted legislation requiring monitoring programs. These states require monitoring either once or with the frequency of monitoring occurring at set intervals or determined by the amount of sewage sludge generated. The states plan to use the occurrence data to inform future actions.

#### Prohibitions on land application:

Two states have completely banned the land application of sewage sludge. In Connecticut, the legislature banned the sale and use of sewage sludge containing PFAS<sup>25</sup> in 2024,<sup>26</sup> though sewage sludge land application generally is not a common practice in the state. Based on available data, about 93% of the sewage sludge managed in Connecticut is incinerated, so removing land application as an

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<sup>18</sup> See Michigan Department of Environment, Great Lakes, and Energy's [LAND APPLICATION OF BIOSOLIDS CONTAINING PFAS Interim Strategy March 2021](#) (page 6), and [LAND APPLICATION OF BIOSOLIDS CONTAINING PFAS Interim Strategy Updated April 2022](#)

<sup>19</sup> See Michigan Department of Environment, Great Lakes, and Energy's webpage [PFAS in biosolids](#)

<sup>20</sup> Several organizations have collected information on state actions to address PFAS in sewage sludge. From the Environmental Council of States (ECOS), see [PFAS in Biosolids: A Review of State Efforts & Opportunities for Action](#). And from the National Association for Clean Water Agencies (NACWA), see [Biosolids PFAS Legislative Guide With Model Legislation](#) (October 2025).

<sup>21</sup> See Senate Bill 386, 164th Gen. Assemb., Reg. Sess. (VA, 2026)

<sup>22</sup> See Senate Bill 5033 (WA, 2025-26)

<sup>23</sup> See House Bill 2947 (OR, 2025)

<sup>24</sup> See House Bill 1019 (FL, 2026)

<sup>25</sup> Connecticut's ban refers to all PFAS defined in their bill as "all members of the class of fluorinated organic chemicals containing at least one fully fluorinated carbon atom."

<sup>26</sup> See Senate Bill 292 (CT, 2024)

available sewage sludge management practice was not anticipated to cause widespread disruptions.<sup>27</sup> Connecticut has also offered free analysis of PFAS in agricultural soils to better understand the presence and magnitude of potential PFAS contamination across the state.<sup>28</sup>

Maine's legislature banned the land application of all sewage sludge in 2022, regardless of the concentration of PFAS, in response to concerns over PFAS contamination.<sup>29</sup> Land application was a more common management practice in Maine compared to Connecticut, with about 40% of sewage sludge in Maine being land applied annually.<sup>30</sup> Maine's ban on land application has led to significant issues and cost increases for utilities in Maine where landfill capacity is limited and there are no in-state sewage sludge incinerators.<sup>31</sup> Since the ban of land application, Maine has also undertaken investigations to identify sites where sewage sludge was historically applied and sampled soil, groundwater, and agricultural products that may have been contaminated.<sup>32</sup>

### **Recommendations For Bulk Land Appliers of Biosolids**

Land application is a cost-effective strategy for adding nutrients and improving soil quality. Biosolids can be used on many types of farms, rangelands, and in forestry. When choosing to use biosolids as a soil amendment, land appliers can consider the following practices:

- Avoiding land application of sewage sludge near fishable waters, lakes or reservoirs that are used as a source of drinking water, or areas that may have higher risks for potential groundwater impacts.
- Avoiding applying sewage sludge in areas where children under the age of 5 have access or may have access in the future. Landowners should also be aware that there are other potential sources of PFAS that could impact or be present on their land.
- Conducting land application on farms with lower risk crops for human exposure, like farms growing grain, fiber crops, or corn for ethanol production.
- Avoiding land application for agricultural practices that have higher risks for human exposures.

### **Recommendations for the General Public**

Currently data does not indicate that there are widespread impacts to the food supply from biosolids containing PFOA and PFOS at the national level, and the general public is not likely to be exposed to sewage sludge-impacted foods, based on the proportion of sewage sludge that is land applied annually and current U.S. Food and Drug Agency (FDA) monitoring data. The EPA estimates that sewage sludge is applied to less than 1% of America's farmland annually.<sup>33</sup> Additionally, most farms land applying

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<sup>27</sup> See [The National Biosolids Project, Connecticut Summary \(2018\)](#)

<sup>28</sup> For more information visit the webpage [Connecticut Agricultural Experiment Station, Monitoring PFAS in CT Agricultural Soils: A pilot program to research soil contamination levels.](#)

<sup>29</sup> See Legislative Document 1911, 130<sup>th</sup> Maine Legislature (ME, 2022)

<sup>30</sup> See [The National Biosolids Project, Maine Summary \(2018\)](#)

<sup>31</sup> See [Analysis of Sludge and State-Owned Landfills as Public Utilities, Pursuant to 2023 Public Law, Chapter 283](#) (January 2024)

<sup>32</sup> See Maine Department of Environmental Protection's webpage [PFAS and Maine DEP](#)

<sup>33</sup> See *supra* 5

sewage sludge grow crops for energy generation or other crops that are not meant for human consumption.<sup>34</sup> The FDA monitors and very rarely finds PFOA or PFOS in foods available in U.S. grocery stores, with the exception of fish, which an FDA study found frequently has detections of PFOS.<sup>35</sup>

However, as mentioned previously, approximately 20% of sewage sludge managed each year is sold directly to the public or applied to sites where the public might be exposed.<sup>36</sup> Some soil amendment products sold in hardware stores and garden centers contain sewage sludge that may be contaminated with PFOA and PFOS. People using biosolids at home or in their community may choose to consider the following practices:

- Researching the supplier of the sewage sludge.
- Avoiding application of sewage sludge in locations where children may have access to the soil, like playgrounds, schools, parks, or around residential homes.
- Avoiding application to garden beds intended for growing higher risk foods most likely to uptake PFOA and PFOS, such as leafy greens and root vegetables, and where egg-laying hens have foraging access.

### **Recommendations for Wastewater Treatment Plants and Other Sewage Sludge Generators**

All efforts to reduce PFAS exposure can help protect public health. WWTPs and other facilities can consider the following:

#### Source-identification, pollution prevention and monitoring:

Pollution prevention can be an effective way to reduce PFOA and PFOS concentrations in sewage sludge, especially if there are significant industrial sources of PFOA or PFOS in the sewer system. Monitoring PFAS in sewage sludge can help determine if sources of PFOA and PFOS are present, and the mixture of PFAS present may give an indication as to which sources are likely contributing these chemicals to the sewer system.

#### Surface disposal of sewage sludge:

Surface disposal is the placement of sewage sludge onto land for final disposal in a sewage sludge unit (*e.g.*, sewage sludge-only landfill or “monofill”). The existing regulatory requirements apply to the owner of the surface disposal unit,<sup>37</sup> which is generally the wastewater utility. These requirements for surface disposal in 40 CFR Part 503 include placement restrictions, methane monitoring, and pollutant limits where applicable, among others. When using surface disposal as a management strategy for PFOA or PFOS-containing sewage sludge, WWTPs could consider adding a composite liner to surface

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<sup>34</sup> See [National Biosolids Data Project, National Summary \(2018\)](#)

<sup>35</sup> See [Food and Drug Administration’s Total Diet Study](#), which finds that ~40% of grocery store fish (including cod, tilapia, and catfish) sampled have detectable levels of PFOS; the maximum fish concentration of PFOS detected in this survey was 610 ppt in catfish.

<sup>36</sup> See *supra* 13

<sup>37</sup> See [40 C.F.R. § 503, Standards for the Use or Disposal of Sewage Sludge, Subpart C – Surface Disposal](#)

disposal units.<sup>38</sup> For more information on leachate collection and treatment systems, please refer to the EPA's most recent *Interim Guidance on the Destruction and Disposal of Perfluoroalkyl and Polyfluoroalkyl Substances and Materials Containing Perfluoroalkyl and Polyfluoroalkyl Substances*.<sup>39</sup>

#### Incineration of sewage sludge:

Sewage sludge incinerators (SSIs) are devices used for the combustion of dewatered sewage sludge. In the U.S., the two main types of SSIs include multi-hearth furnaces and fluidized bed combustors. SSI unit design and operation can vary widely across the nation, and the agency understands that current SSI standard operating conditions may not be effective for the treatment of PFOA, PFOS and other PFAS and may lead to other environmental and human health impacts. To better understand potential risks from incineration of sewage sludge, WWTPs may consider performance testing of incinerators to gain information about potential releases of PFOA, PFOS, and other PFAS that could be generated through incomplete combustion.<sup>40</sup>

#### Funding Opportunities for implementing draft guidance:

Managing PFAS in sewage sludge can be an expensive undertaking. The EPA supports water systems in reducing PFAS and emerging contaminants in wastewater through a range of funding resources. Federal funding opportunities include the Clean Water State Revolving Fund (CWSRF) program<sup>41</sup> and the Water Infrastructure Finance and Innovation Act (WIFIA) program.<sup>42</sup>

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<sup>38</sup> From a groundwater infiltration perspective, wastewater lagoons are not dissimilar from sewage sludge surface disposal sites. Though lagoons are a treatment technology, not a disposal method, the modeling exercises in the draft risk assessment can also be used to qualitatively understand potential infiltration risks at some lagoons.

<sup>39</sup> See [Interim Guidance on the Destruction and Disposal of Perfluoroalkyl and Polyfluoroalkyl Substances and Materials Containing Perfluoroalkyl and Polyfluoroalkyl Substances— 2026 Version](#) (April 2026)

<sup>40</sup> For example, a recently released air method, [OTM-50](#), can help test emissions for more volatile products of incomplete combustion, in addition to using [OTM-45](#) to monitor for PFAS emissions. For more information, see *supra* 39.

<sup>41</sup> See the EPA's webpage [Clean Water State Revolving Fund Emerging Contaminants](#)

<sup>42</sup> See the EPA's webpage [Water Infrastructure Finance and Innovation Act \(WIFIA\)](#)