



MAINE RURAL WATER ASSOCIATION

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To: Senator Tepler, Representative Doudera, and Members of the Joint Standing Committee on Environment and Natural Resources

From: Bradley Sawyer, Deputy Director

Date: April 28, 2025

Re: Testimony in Opposition to L.D. 1604, An Act to Protect Groundwater and Surface Waters from Perfluoroalkyl and Polyfluoroalkyl Substances from Landfill Leachate

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Senator Tepler, Representative Doudera, and distinguished members of the Committee on Environment and Natural Resources, thank you for the opportunity to present testimony on behalf of the Maine Rural Water Association. MRWA represents the interests of small and rural water and wastewater systems across the state, including many publicly owned treatment works serving rural and underserved communities. We strongly support efforts to protect Maine's waters from PFAS contamination. However, we are compelled to express concerns with Section two of L.D. 1604, which would prohibit the discharge of landfill leachate unless it meets yet-to-be-determined PFAS effluent limits, starting June 1, 2026.

The timeline established by this bill for PFAS compliance is unrealistically short. Wastewater utilities do not currently have the infrastructure, technology, or financial resources required to meet PFAS effluent standards as a hypothetical limit is not something that any of these systems were built to treat. Retrofitting or constructing advanced PFAS treatment systems involves a multi-year planning and permitting process—followed by construction, pilot testing, and eventual operation. Under the proposed deadline, many facilities would face non-compliance not for lack of effort, but due to circumstances beyond their control.

Currently, there is no cost-effective, proven PFAS treatment technology available on a scale for most municipal wastewater facilities. Technologies like granular activated carbon, reverse osmosis, and advanced oxidation processes are extremely expensive and energy intensive. For small and rural communities with limited ratepayer bases, the capital and operating costs for these technologies would be prohibitively high and would lead to significant rate increases if not offset by substantial state or federal funding.

We are also concerned about the broader consequences of this proposal. If POTWs are unable to accept landfill leachate due to unachievable discharge standards, it could lead to adverse outcomes including unauthorized leachate disposal, financial instability in inter-municipal waste management systems, and disruption to regional PFAS mitigation efforts. Ultimately these chemicals are being received by landfills and POTWs due to their ubiquity, and not as a result of those entities' actions. We lament the fact that our wastewater systems are forced into this conversation but passing legislation that would cause harm to their users, Maine taxpayers, is not a reasonable solution.

We remain committed to working with the Legislature, the Department of Environmental Protection, and other stakeholders to find pragmatic, science-based solutions to Maine's PFAS challenges. I am happy to answer your questions and can be reached at [Bradley.Sawyer@MaineRWA.org](mailto:Bradley.Sawyer@MaineRWA.org) or 207-737-9014.