



NORTH FRONT RANGE WATER QUALITY PLANNING ASSOCIATION
257 Johnstown Center Dr.; Unit 206
Johnstown, CO 80534
970-587-8872 – <http://www.nfrwqpa.org>

ASSOCIATION MEETING AGENDA

July 23, 2026 @ 2:00 PM

Hybrid Meeting

Microsoft Teams [Need help?](#)

[Join the meeting now](#)

Meeting ID: 223 152 828 710 16

Passcode: 8fo2R9J2

Notice is given to the North Front Range Water Quality Planning Association (NFRWQPA) members and the general public that the Association will hold its regular membership meeting, which is open to the public.

The following “ground rules” are recommended for membership meetings:

- **Fact over Person:** Discussions and statements must remain strictly factual regarding the situation/policy.
- **The Issue, Not the Individual:** All comments must address the *issue*, never the *person* involved.

1. **CALL MEETING TO ORDER.**

2. **NOTICE TO MEMBERSHIP MEETING IS RECORDED.**

3. **DETERMINATION OF A QUORUM FROM MEMBERSHIP.** – Attachment #1 (page 3).

4. **APPROVAL OF AGENDA.**

5. **DISCLOSURE OF POTENTIAL CONFLICTS OF INTEREST.**

6. **PUBLIC COMMENTS.**

7. **APPROVAL OF PAST MINUTES.** – Attachment #2 (pages 4 - 7).
For review and consideration are the meeting minutes from June 25, 2026.

8. **FINANCIAL REPORTS:** – Attachment #3 (pages 8 - 10).
The June 2026 financial statements are for review and consideration.

9. **DISCUSSION ITEM:** 2025 Association Financial Audit - Attachment #4 (pages 11 - 23).
The Association concluded its 2025 Association Financial Audit, and the report may be viewed within Attachment #4. No errors, omissions, or discrepancies were discovered during the audit.

10. **DECISION ITEM:** Boxelder Sanitation District – 208 Plan Amendment – Old Clay Interceptor
The Boxelder Sanitation District proposes to amend the 208 Areawide Water Quality Management Plan to include the replacement and relocation of the Old Clay Interceptor project. The Boxelder Sanitation District 208 Amendment, including the replacement and relocation of the Old Clay Interceptor project, can be viewed [here](#).
Recommendation: Approve

11. **DISCUSSION ITEM:** Policy 17-1 (VIP) Comments update - Attachment #5 (pages 24 - 27).
Please see attachment #5 for the Colorado Wastewater Utility Council (CWWUC) comments submitted

to David Kurz with the Water Quality Control Division regarding ideas or suggestions to update the VIP program. Agencies may submit their own comments to Mr. Kurz (david.kurz@state.co.us) regarding ideas or suggestions for updating the VIP program.

12. DISCUSSION ITEM: PFAS Guidance for Biosolids - Attachment #6 (pages 28 - 37).

The EPA's PFAS Guidance for Biosolids is published and available for comment. Comments are due September 4th. See: [Draft Guidance for Reducing Risk from Perfluorooctanoic Acid \(PFOA\) and Perfluorooctane Sulfonic Acid \(PFOS\) in Biosolids | US EPA](#)

13. DISCUSSION ITEM: Nonpoint Source Projects Dashboard update.

The Association did apply for the CWCB Water Plan grant, and the following provides the Grant Funding and Timeline Overview. The CWCB has approximately \$40.2M to award this year and received over \$49M in funding requests this grant cycle. The grant review, recommendation, and contracting processes (if awarded) typically take between **6-9 months total** from the application deadline.

Key Dates and Process Steps

July 2026 – September 2026: Application Review

- Staff will conduct grant review panels to evaluate applications against the program criteria and guidelines.
- Staff may reach out to you during this period with clarifying questions.

September 16-17, 2026: Board Decision

- Staff will notify you of their funding recommendation in the weeks ahead of the Board meeting.
- CWCB staff will present award recommendations to the CWCB Board for consideration during their hybrid meeting on these dates.
- While applicants are welcome to attend the hybrid meeting, it is neither expected nor required. **Late**

September 2026: Contracting Begins (If Awarded)

- If your project is awarded funding, staff will provide a notice of award and begin the contracting process.
- This contracting phase is a shared responsibility and can take several months.

Late Fall 2026/early 2027

- Once the agreement is fully executed, the grantee will receive a notice to proceed and a copy of the grant agreement and can begin incurring reimbursable costs.
 - **Important Reminder: The CWCB cannot reimburse for any expenses incurred before a fully executed agreement and a notice to proceed is in place.**

14. DISCUSSION ITEM: Workgroup Update Presentations.

The workgroup updates are available [HERE](#). Ideally, you should read them before the meeting and bring any questions you may have. This is the allotted time for any clarification you may need regarding workgroup updates.

15. ADJOURN

NORTH FRONT RANGE WATER QUALITY PLANNING ASSOCIATION

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Designated Management and Operation Agency Members

	Designation	Primary Contact	Alternate Contact	2026 Dues
1 Ault, Town of	Management/Operation Agency	Grant Ruff	Dustin Preston	Paid
2 Berthoud, Town of	Management/Operation Agency	Chris Kirk	Wayne Ramey	Paid
3 Boxelder Sanitation District	Management/Operation Agency	Brian Zick	David Lewis	Paid
4 Brighton, Town of	Management/Operation Agency	Sherry Scaggiari	Emily Meek	Paid
5 Broomfield, City & County	Management/Operation Agency	Ken Rutt	Dennis Rodriguez	Paid
6 Dacono, City of	Management Agency	Bobby Redd	Jennfier Krieger	Paid
7 Eaton, Town of	Management/Operation Agency	Greg Brinck	Wesley LaVanchy	Paid
8 Erie, Town of	Management/Operation Agency	Jon Coyle	Bruce Chameroy	Paid
9 Estes Park Sanitation District	Operation Agency	Tony Drees		Paid
10 Evans, City of	Management/Operation Agency	Robby Porsch		Paid
11 Fox Acres Community Services	Private Agency	Richard Hopp	James Cates	Paid
12 Frederick, Town of	Management Agency	Bryan Ostler	Tiffany Lozada	
13 Ft. Collins, City of	Management/Operation Agency	Kathryne Marko	Jesse Schlam	Paid
14 Ft. Lupton, City of	Management/Operation Agency	Chris Cross		Paid
15 Gilcrest, Town of	Management/Operation Agency	Bob Meisner		Paid
16 Greeley, City of	Management/Operation Agency	Tyler Eldridge	Adam Prior	Paid
17 Hudson, Town of	Management/Operation Agency	Bryce Lange	Jennifer Woods	Paid
18 Johnstown, Town of	Management/Operation Agency	Greg Venette	Philip Barone	Paid
19 Keenesburg, Town of	Management/Operation Agency	Mark Gray		Paid
20 Kersey, Town of	Management/Operation Agency	Kurt Smith	Stacy Brown	Paid
21 Larimer County	Management Agency	Keila Flores		Paid
22 LaSalle, Town of	Management/Operation Agency	Barry Schaeffer		Paid
23 Lochbuie, Town of	Management/Operation Agency	AJ Euckert	Wayne Ramey	Paid
24 Longmont, City of	Management/Operation Agency	Azara Bilgin	Mary Paterniti	Paid
25 Loveland, City of	Management/Operation Agency	Joe Creaghe	Brandon Cayou	Paid
26 Mead, Town of	Management/Operation Agency	Hellen Migchelbrink	Erika Rasmussen	Paid
27 Metro Water Recovery	Operation Agency	Erik Burggraf	Jennifer Robinett	Paid
28 Milliken, Town of	Management/Operation Agency	Don Stonebrink	Brad Simons	Paid
29 Northglenn, City of	Management/Operation Agency	Manuel Freye		Paid
30 Pierce, Town of	Management/Operation Agency	Pat Larson		Paid
31 Platteville, Town of	Management/Operation Agency	David Brand	Josh Leyba	Paid
Resource Colorado Water & Sanitation				
32 Metro District		Paul Wilson	Paul Goluskin	Paid
33 Severance, Town of	Management/Operation Agency	Nicholas Wharton	Mike Ketterling	Paid
34 South Ft. Collins San. Dist.	Management/Operation Agency	Derik Caudill	Randy Kenyon	Paid
35 St. Vrain Sanitation District	Management/Operation Agency	Chris Kampmann	Dan Feller	Paid
36 Timnath, Town of	Management/Operation Agency	Earl Smith	Justin Stone	Paid
37 Upper Thompson San. Dist.	Management/Operation Agency	Suzanne Jurgens	Matt Allen	Paid
38 Weld County	Management Agency	David Eisenbraun		Paid
39 Wellington, Town of	Management/Operation Agency	Bob Gowing	Mike Flores	Paid
40 Windsor, Town of	Management/Operation Agency	Chris Claymore	John Thornhill	Paid

Associates and Industries

41 NCWCD	Associate	Anna Hermes	Ester Vincent	Paid
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41 Representative Votes / 10 Representatives required for Quorum (25%)

rev. 3-16-26

Attachment #2



NORTH FRONT RANGE WATER QUALITY PLANNING ASSOCIATION
257 Johnstown Center Dr.; Unit 206
Johnstown, CO 80534
970-587-8872 – <http://www.nfrwqpa.org>

ASSOCIATION MEETING MINUTES

June 25, 2026 @ 2:00 PM

1. **CALL MEETING TO ORDER.**

Mr. Thomas called the meeting to order at 2:02 PM.

2. **NOTICE TO MEMBERSHIP MEETING IS RECORDED.**

Mr. Thomas notified the membership that the meeting was recorded.

3. **DETERMINATION OF A QUORUM FROM MEMBERSHIP.**

Attendance:

NFRWQPA – Mr. Thomas, Manager

Executive Committee Officers –

Vice Chair – Matt Allen – Upper Thompson S.D

Treasurer – Jesse Schlam – Ft. Collins

Officer – Randy Kenyon – S. Fort Collins S.D.

Officer – Brian Zick – Boxelder S.D.

Officer – Savana Dumler – Berthoud

Executive Committee Officers Absent –

Chair – Tyler Eldridge – Greeley

Officer – Chris Kampmann – St. Vrain S.D.

Membership –

Anthony Tuka – Broomfield

Brandon Cayou – Loveland

Chad Riley – Broomfield

Chloe Prayon – Boxelder S.D.

Chris Manley – NCWCD

Dennis Rodriguez – Broomfield

Desirray Bonsall – Loveland

Diana Trejo Calzada – Broomfield

Eric Bailey – S. Fort Collins S.D.

Erik Burggraf – Metro Water Recovery

Greg Venette – Johnstown

Joe Creaghe – Loveland

Josh Leyba – Platteville

Kayla Reed – Greeley

Keila Flores – Larimer County

Kurt Smith – Kersey

Manuel Freye – Northglenn

Mike Flores – Wellington

Meagen Smith – Wellington

Philip Barone – Johnstown

Robby Porsch – Evans

Roy Vestal – Fort Lupton

Ryan Omiecinski – Windsor

Sandra Mourning - Upper Thompson S.D

Sherry Scaggiari – Brighton

Zakery Brennecke – Northglenn

Public –

Jimmy Sias – Fuzion

Katie Koplitz – Hazen and Sawyer

Garret Geer – Jacobs

Amanda Clements – Jacobs

Steve Ravel – AE2S

– Mr. Thomas announced a quorum.

4. **APPROVAL OF AGENDA.**

Mr. Schlam motioned to approve the agenda, seconded by Mr. Allen. The motion carried unanimously.

5. **DISCLOSURE OF POTENTIAL CONFLICTS OF INTEREST.**

Mr. Kenyon with S. Fort Collins S.D. disclosed a potential conflict of interest with agenda item # 9; South Fort Collins Sanitation District Site Application – Phase 2 Expansion.

6. PUBLIC COMMENTS.

No public comments were stated.

7. APPROVAL OF PAST MINUTES.

Mr. Allen motioned to approve the May 28, 2026, meeting minutes, seconded by Mr. Schlam. The motion carried unanimously.

8. FINANCIAL REPORTS.

Mr. Schlam moved to approve the May 2026 financial statement, seconded by Mr. Allen. The motion carried unanimously.

9. DECISION ITEM: South Fort Collins Sanitation District Site Application – Phase 2 Expansion.

Garret Geer with Jacobs presented the South Fort Collins Sanitation District Site Application – Phase 2 Expansion for consideration. Phase 1 of the South Fort Collins WRF expansion was completed in 2022, increasing flow capacity from 4.5 to 6.0 MGD. Phase 2 will maintain the 6.0 MGD flow rate while expanding BOD loading capacity from 12,000 to 18,300 lb/day. This expansion will include improvements and/or expansion of the step-feed aeration basin, blower, sidestream biological phosphorus removal, large-bubble mixing, autothermal thermophilic aerobic digestion (ATAD), simultaneous nitrification/denitrification reactors (SNDR), heat exchanger, odor control, struvite management, and equipment operations.

Mrs. Scaggiari moved to approve the South Fort Collins Sanitation District Site Application – Phase 2 Expansion, seconded by Mr. Schlam. The motion carried unanimously.

10. DECISION ITEM: 2027 Proposed Budget.

Mr. Thomas presented the recommended 2027 Association Budget, which includes a one-time 5% dues increase to be reassessed annually. The Association explored freezing dues, raising them by 5% annually for the next five years, or increasing them by 5% in 2027 to be reassessed annually.

Mr. Zick moved to approve the 2027 DRAFT budget with a one-time 5% dues increase for 2027 to be reassessed annually, seconded by Mr. Schlam. The motion carried unanimously.

11. PRESENTATION: Broomfield Water Recovery Facility Updates.

Mrs. Trejo Calzada and Mr. Rodriguez with the Broomfield Water Recovery Facility (WRF) presented its 13-year, \$524 million Capital Improvement Project (CIP), which encompasses five phases of strategic improvements and upgrades. This project, developed in collaboration with Carollo Engineers, is driven by the need for regulatory compliance, asset renewal, and capacity enhancements.

12. DISCUSSION ITEM: Maverick Solutions Introduction.

Mr. Mike Weber and Mrs. Amber Weber with Maverick Solutions presented how Maverick Solutions' work integrates with the Association's Nonpoint Source Projects Dashboard and benefits both point and nonpoint stakeholders in regional water quality improvements, as part of an interdisciplinary study promoting water quality trading. Maverick Solutions with municipalities, agricultural partners, nonprofits, and other stakeholders to develop practical, scalable approaches to complex water-quality and resource challenges. Mr. Thomas stated he believes this work can be implemented as a Phase 2 approach in developing the Nonpoint Source Projects Dashboard to promote water quality trading and improve the overall water quality health of watersheds within the Association's 208 Region. Mr. Leyba recommended that the Association pursue the partnership with Maverick Solutions to further develop the Nonpoint Source Projects Dashboard to improve regional water quality.

13. **DISCUSSION ITEM**: Workgroup Update Presentations.

Mr. Thomas presented the June Workgroup summary and updates.

14. **ADJOURN**

Attachment #3

NORTH FRONT RANGE WATER QUALITY PLANNING ASSOCIATION

Balance Sheet

As of June 30, 2026

Cash Basis

Account	Jun 30, 2026	May 31, 2026	\$ Change
Assets			
Current Assets			
Cash and Cash Equivalents			
1100 - Checking NFRWQPA	14,971.43	17,997.00	(3,025.57)
1250 - Colorado Trust NFRWQPA	633,171.04	651,207.87	(18,036.83)
Total Cash and Cash Equivalents	648,142.47	669,204.87	(21,062.40)
1500 - Security Deposit	1,353.00	1,353.00	0.00
Total Current Assets	649,495.47	670,557.87	(21,062.40)
Total Assets	649,495.47	670,557.87	(21,062.40)
Liabilities and Equity			
Liabilities			
Current Liabilities			
2406 - Accrued Vacation Payable	1,592.31	1,592.31	0.00
2300 - Pension Payable	960.38	960.38	0.00
2407 - PERA Payable	2,772.53	2,772.52	0.01
2050 - Mark's CC x5076	580.28	335.53	244.75
Total Current Liabilities	5,905.50	5,660.74	244.76
Total Liabilities	5,905.50	5,660.74	244.76
Equity			
2810 - Assets Beginning of Year	572,240.82	572,240.82	0.00
Current Year Earnings	91,189.86	112,497.02	(21,307.16)
3900 - Retained Earnings	(19,840.71)	(19,840.71)	0.00
Total Equity	643,589.97	664,897.13	(21,307.16)
Total Liabilities and Equity	649,495.47	670,557.87	(21,062.40)

No assurance is provided on these financial statements.
The financial statements do not include a statement of cash flows.
Substantially all disclosures required by GAAP omitted.

NORTH FRONT RANGE WATER QUALITY PLANNING ASSOCIATION

Statements of Revenue and Expenses - Budget vs Actual

For the one month ended June 30, 2026

Cash Basis

Account	Jun 2026	Jan-Jun 2026	Budget	% of Budget
Income				
9010 - Membership Dues	0.00	183,593.89	181,389.00	101.22%
9020 - Interest Income	1,963.17	11,016.04	12,500.00	88.13%
9030 - CDPH & E	0.00	16,416.25	44,400.00	36.97%
Total Income	1,963.17	211,026.18	238,289.00	88.56%
Expenses				
3105 - Employee Compensation	13,997.54	83,985.24	169,563.00	49.53%
3400 - FICA/PERA Manager	1,928.57	11,571.42	25,000.00	46.29%
3600 - Workman's Compensation	0.00	0.00	450.00	0.00%
5010 - Rent & Utilities	1,597.00	7,985.00	20,000.00	39.93%
5100 - Telephone Cellular	75.00	450.00	900.00	50.00%
5120 - Interest	0.00	0.00	5.00	0.00%
5130 - Internet Service	377.44	1,130.68	2,500.00	45.23%
5140 - IT Support	439.88	3,088.05	5,000.00	61.76%
5150 - Advertising	0.00	0.00	100.00	0.00%
5160 - Insurance	0.00	0.00	1,000.00	0.00%
5300 - Office Supplies	22.43	1,536.24	2,000.00	76.81%
5350 - Postage	0.00	78.00	100.00	78.00%
5400 - Dues & Subscriptions	0.00	730.00	5,000.00	14.60%
5425 - Intergovernmental Assist	0.00	0.00	10,000.00	0.00%
5500 - Mileage Reimbursement	0.00	0.00	250.00	0.00%
5510 - Meals & Lodging	67.47	172.44	1,500.00	11.50%
5520 - Transportation	0.00	0.00	500.00	0.00%
5550 - Conferences	0.00	80.35	2,500.00	3.21%
5600 - Accounting	315.00	1,890.00	4,000.00	47.25%
5650 - Auditing	0.00	0.00	5,500.00	0.00%
5700 - Legal	0.00	0.00	25,000.00	0.00%
5750 - Bank Charges	0.00	0.00	10.00	0.00%
5800 - Capital Recovery	0.00	0.00	750.00	0.00%
5850 - Capital Expenditures	0.00	0.00	3,500.00	0.00%
5900 - Contingency Website	0.00	680.40	750.00	90.72%
6010 - Contract Services/GIS	4,450.00	6,458.50	25,000.00	25.83%
Total Expenses	23,270.33	119,836.32	310,878.00	38.55%
Net Revenues and Expenses	(21,307.16)	91,189.86	(72,589.00)	-125.62%

No assurance is provided on these financial statements.
The financial statements do not include a statement of cash flows.
Substantially all disclosures required by GAAP omitted.

Attachment #4

NORTH FRONT RANGE WATER QUALITY PLANNING ASSOCIATION

FINANCIAL STATEMENTS

December 31, 2025

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JOHN CUTLER & ASSOCIATES

Board of Directors
North Front Range Water Quality Planning Association
Johnstown, Colorado

Independent Auditors' Report

Report on the Financial Statements

Opinions

We have audited the financial statements of the North Front Range Water Quality Planning Association (the "Organization") which comprise the statement of financial position as of and for the year ended December 31, 2025, and the related statements of activities, cash flows, functional expenses and the related notes to the financial statements, which collectively comprise the Organization's basic financial statements as listed in the table of contents.

In our opinion, the accompanying financial statements referred to above present fairly, in all material respects, the respective financial position of the statement of financial position and the related statements of activities, cash flows and functional expenses of the North Front Range Water Quality Planning Association as of December 31, 2025, and the respective changes in financial position and, where applicable, cash flows, thereof for the year then ended, in accordance with accounting principles generally accepted in the United States of America.

Basis for Opinions

We conducted our audit in accordance with auditing standards generally accepted in the United States of America (GAAS). Our responsibilities under those standards are further described in the Auditor's Responsibilities for the Audit of the Financial Statements section of our report. We are required to be independent of the North Front Range Water Quality Planning Association and to meet our ethical responsibilities, in accordance with the relevant ethical requirements relating to our audit. We believe that the audit evidence we have obtained is sufficient and appropriate to provide a basis for our audit opinions.

Responsibilities of Management for the Financial Statements

Management is responsible for the preparation and fair presentation of the financial statements in accordance with the accounting principles generally accepted in the United States of America, and for the design, implementation, and maintenance of internal control relevant to the preparation and fair presentation of financial statements that are free from material misstatement, whether due to fraud or error.

In preparing the financial statements, management is required to evaluate whether there are conditions or events, considered in the aggregate, that raise substantial doubt about the Organization's ability to continue as a going concern for twelve months beyond the financial statement date, including any currently known information that may raise substantial doubt shortly thereafter.

Auditor's Responsibilities for the Audit of the Financial Statements

Our objectives are to obtain reasonable assurance about whether the financial statements as a whole are free from material misstatement, whether due to fraud or error, and to issue an auditor's report that includes our opinions. Reasonable assurance is a high level of assurance but is not absolute assurance and therefore is not a guarantee that an audit conducted in accordance with GAAS will always detect a material misstatement when it exists. The risk of not detecting a material misstatement resulting from fraud is higher than for one resulting from error, as fraud may involve collusion, forgery, intentional omissions, misrepresentations, or the override of internal control. Misstatements are considered material if there is a substantial likelihood that, individually or in the aggregate, they would influence the judgement made by a reasonable user based on the financial statements.

In performing an audit in accordance with GAAS, we:

- Exercise professional judgement and maintain professional skepticism throughout the audit.
- Identify and assess the risks of material misstatement of the financial statements, whether due to fraud or error, and design and perform audit procedures responsive to those risks. Such procedures include examining, on a test basis, evidence regarding the amounts and disclosures of the financial statements.
- Obtain an understanding of internal control relevant to the audit in order to design audit procedures that are appropriate in the circumstances, but not for the purpose of expressing an opinion of the effectiveness of the Organization's internal control. Accordingly, no such opinion is expressed.
- Evaluate the appropriateness of accounting policies used and the reasonableness of significant accounting estimates made by management, as well as evaluate the overall presentation of the financial statements.
- Conclude whether, in our judgement, there are conditions or events, considered in the aggregate, that raise substantial doubt about the Organization's ability to continue as a going concern for a reasonable period of time.

We are required to communicate with those charged with governance regarding, among other matters, the planned scope and timing of the audit, significant audit findings, and certain internal control-related matters that we identified during the audit.

John Cutler & Associates, LLC

June 23, 2026

NORTH FRONT RANGE WATER QUALITY PLANNING ASSOCIATION

STATEMENT OF FINANCIAL POSITION

December 31, 2025

ASSETS

Current Assets

Cash and Cash Equivalents	\$ 546,317
Accounts Receivable	10,209
Deposits	<u>1,353</u>

TOTAL ASSETS

\$ 557,879

LIABILITIES AND NET ASSETS

Current Liabilities

Accounts Payable	\$ 506
Accrued Expenses	<u>4,972</u>

Total Current Liabilities

5,478

NET ASSETS

Without Donor Restrictions	552,401
With Donor Restrictions	<u>-</u>

Total Net Assets

552,401

TOTAL LIABILITIES AND NET ASSETS

\$ 557,879

The accompanying notes are an integral part of the financial statements.

NORTH FRONT RANGE WATER QUALITY PLANNING ASSOCIATION

STATEMENT OF ACTIVITIES

Year Ended December 31, 2025

	Without Donor Restrictions	With Donor Restrictions	Total
REVENUES, GAINS AND OTHER SUPPORT			
Membership Dues	\$ 178,159	\$ -	\$ 178,159
Interest Income	25,112	-	25,112
Contract Services	105,226	-	105,226
Other Income	20,000	-	20,000
Net Assets Released from Restrictions	-	-	-
	<u>328,497</u>	<u>-</u>	<u>328,497</u>
TOTAL REVENUES, GAINS AND OTHER SUPPORT			
	<u>328,497</u>	<u>-</u>	<u>328,497</u>
EXPENSES			
Program Services	208,432	-	208,432
	<u>208,432</u>	<u>-</u>	<u>208,432</u>
Total Program Services			
	<u>208,432</u>	<u>-</u>	<u>208,432</u>
Supporting Services			
General and Administrative	36,130	-	36,130
	<u>36,130</u>	<u>-</u>	<u>36,130</u>
Total Supporting Services			
	<u>36,130</u>	<u>-</u>	<u>36,130</u>
TOTAL EXPENSES			
	<u>244,562</u>	<u>-</u>	<u>244,562</u>
CHANGE IN NET ASSETS			
	83,935	-	83,935
NET ASSETS, Beginning			
	<u>468,466</u>	<u>-</u>	<u>468,466</u>
NET ASSETS, Ending			
	<u>\$ 552,401</u>	<u>\$ -</u>	<u>\$ 552,401</u>

The accompanying notes are an integral part of the financial statements.

NORTH FRONT RANGE WATER QUALITY PLANNING ASSOCIATION

STATEMENT OF CASH FLOWS

Year Ended December 31, 2023

CASH FLOWS FROM OPERATING ACTIVITIES

Change in Net Assets	\$ 83,935
Adjustments to Reconcile Changes in Net Assets to	
Net Cash Provided by Operating Activities	
Decrease in Accounts Receivable	(10,209)
Increase in Accounts Payable	(1,212)
Increase in Accrued Expenses	<u>(24)</u>
Net Cash Provided by Operating Activities	<u>72,490</u>
NET INCREASE (DECREASE) IN CASH	72,490
CASH, Beginning	<u>473,827</u>
CASH, Ending	<u><u>\$ 546,317</u></u>

The accompanying notes are an integral part of the financial statements.

NORTH FRONT RANGE WATER QUALITY PLANNING ASSOCIATION

STATEMENT OF FUNCTIONAL EXPENSES

Year Ended December 31, 2025

	<u>Program Services</u>	<u>Support Services</u>	
	<u>Program</u>	<u>Management and</u>	<u>Totals</u>
	<u>Expenses</u>	<u>General</u>	
Salaries and Wages	\$ 173,324	\$ 9,603	\$ 182,927
Rent	17,864	990	18,854
Dues and Subscriptions	-	1,761	1,761
Insurance	399	399	798
Contract Services	12,845	-	12,845
Telephone	-	900	900
Office Expenses	-	7,898	7,898
Accounting and Legal	-	13,691	13,691
Other	4,000	888	4,888
	<u>\$ 208,432</u>	<u>\$ 36,130</u>	<u>\$ 244,562</u>

The accompanying notes are an integral part of the financial statements.

NORTHWEST FRONT RANGE WATER QUALITY PLANNING ASSOCIATION

NOTES TO THE FINANCIAL STATEMENTS

December 31, 2025

NOTE 1: SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES

Organization – North Front Range Water Quality Planning Association, (the organization) is a nonprofit corporation, established under the laws of Colorado to provide area wide water quality planning and monitoring services for Larimer and Weld Counties as described in the Clean Water Act of 1977. The organization uses collaborative regional planning, facilitation, and review to ensure that present and future wastewater needs are met economically and with a focus on water quality protection.

Program activities include the functions necessary to provide support for the organization's program activities. General and administrative activities include those that provide governance (Board of Directors), oversight, business management, financial recordkeeping, budgeting, legal services, human resource management, and similar activities that ensure an adequate working environment and an equitable employment program.

Basis of Presentation –The financial statements of North Front Range Water Quality Planning Association. have been prepared in accordance with U.S. generally accepted accounting principles ("US GAAP"), which require the organization to report information regarding its financial position and activities according to the following net asset classifications:

Net assets without donor restrictions: Net assets that are not subject to donor-imposed restrictions and may be expended for any purpose in performing the primary objectives of the organization. These net assets may be used at the discretion of the Organization's management and the board of directors.

Net assets with donor restrictions: Net assets subject to stipulations imposed by donors, and grantors. Some donor restrictions are temporary in nature; those restrictions will be met by actions of the Organization or by the passage of time.

Cash and Cash Equivalents – For financial statement purposes, the Organization considers all highly liquid investments with an original maturity of three months or less to be cash equivalents.

Contributions – Contributions received are recognized in the period received. All contributions are considered to be available for unrestricted use unless specifically restricted by the donor. Amounts received that are restricted by the donor for specific purposes are reported as net assets with donor restrictions. Support that is restricted by the donor is reported as net assets without donor restrictions if the restriction expires in the reporting period in which the support is recognized. Net assets with donor restrictions are reclassified to net assets without donor restrictions when the donor restriction is satisfied. When a restriction expires, net assets are reclassified from net assets with donor restrictions to net assets without donor restrictions in the statements of activities.

NORTHWEST FRONT RANGE WATER QUALITY PLANNING ASSOCIATION

NOTES TO THE FINANCIAL STATEMENTS

December 31, 2025

NOTE 1: SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES(Continued)

Contributed property and equipment are recorded at fair value at the date of donation. Contributions with donor-imposed stipulations regarding how long the contributed assets must be used are recorded as net assets with donor restrictions; otherwise, the contributions are recorded as net assets without donor restrictions.

Fair value measurements – Fair value is defined as the price that would be received to sell an asset in the principal or most advantageous market for the asset in an orderly transaction between market participants on the measurement date. Fair value should be based on the assumptions market participants would use when pricing an asset. US GAAP establishes a fair value hierarchy that prioritizes investments based on those assumptions. The fair value hierarchy gives the highest priority to quoted prices in active markets (observable inputs) and the lowest priority to an entity's assumptions (unobservable inputs). The Organization groups assets at fair value in three levels, based on the markets in which the assets and liabilities are traded and the reliability of the assumptions used to determine fair value. These levels are:

- Level 1 Unadjusted quoted market prices for identical assets or liabilities in active markets as of the measurement date.
- Level 2 Other observable inputs, either directly or indirectly, including:
 - Quoted prices for similar assets/liabilities in active markets;
 - Quoted prices for identical or similar assets in non-active markets;
 - Inputs other than quoted prices that are observable for the asset/liability; and,
 - Inputs that are derived principally from or corroborated by other observable market data.
- Level 3 Unobservable inputs that cannot be corroborated by observable market data.

The Organization has investments that are valued using Level 1 inputs.

Revenue Recognition – All revenues are recognized as earned.

NORTHWEST FRONT RANGE WATER QUALITY PLANNING ASSOCIATION

NOTES TO THE FINANCIAL STATEMENTS

December 31, 2025

NOTE 1: SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES (Continued)

Functional Allocation of Expenses – The costs of providing the various programs and other activities have been summarized on a functional basis in the accompanying financial statements. Accordingly, certain costs have been allocated among the program and supporting services. Such allocations are determined by management on an equitable basis.

Income Tax Status – The organization is exempt from federal income tax under Section 501(c)(1) of the Internal Revenue Code (IRC), though it would be subject to tax on income unrelated to its exempt purposes (unless that income is otherwise excluded by the IRC). Contributions to the organization are tax deductible to donors under section 170 of the IRC. The organization is not classified as a private foundation.

Subsequent Events – Potential subsequent events were considered through June 23, 2026.

NOTE 2: IN-KIND DONATIONS

A number of volunteers have donated time in connection with Organization's activities. No amounts have been reflected in the financial statements for these donated services as they do not meet the criteria for recognition under SFAS No. 116.

NOTE 3: AVAILABILITY AND LIQUIDITY

As of December 31, 2025, the Organization has a working capital of \$551,048 and average days (based on normal expenditures) cash on hand of 824.

Financial assets available for general expenditure within one year of the balance sheet date, consist of the following:

Cash and Investments	\$ 546,317
Accounts Receivable, Net	<u>10,209</u>
Total Financial Assets	<u>556,526</u>
Less amounts not available to be used within a year:	
Net Assets with donor restrictions	<u>-</u>
Financial Assets available to meet general expenditures over the next twelve months	<u>\$ 556,526</u>

As part of its liquidity plan, excess cash is invested in short-term investments, including money market accounts.

NORTHWEST FRONT RANGE WATER QUALITY PLANNING ASSOCIATION

NOTES TO THE FINANCIAL STATEMENTS

December 31, 2025

NOTE 4: NET ASSETS

Net assets without donor restrictions for the years ended December 31, 2025 were \$552,401.

NOTE 5: RETIREMENT PLANS

The Organization participates in a defined benefit plan administered by the Colorado Public Employees' Retirement Association (PERA). The Plan covers the Manager of the Organization. The benefits are based on years of service and the employee's average annual wages. The Plan's funded status is recognized in the financial statements of PERA. During the year ended December 31, 2025, Organization recorded \$20,827 in pension costs.

Attachment #5

Hi David,

Thank you so much for the opportunity to contribute ideas for how to use VIP credits with the new plan for Reg. 85. We really appreciate being a part of the conversation at the beginning. Some of the Wastewater Utility Council members met and discussed ideas, which are briefly outlined below. These aren't necessarily endorsed by all members—I'm including anything that anyone brought up.

There is a lot of enthusiasm and interest in this conversation, and we welcome the opportunity to brainstorm any time!

The CWWUC subgroup was in general agreement on a few overarching concepts:

- We feel fairly flexible in how VIP credits are honored, as long as they provide meaningful benefit to participating permittees.
- There is a preference for solutions that could be implemented in the near-ish term. For example, we discussed what it would mean to delay using VIP credits until Reg. 31 standards are adopted and water quality-based limits are applied to permits, which would mean potentially holding credits until the 2050s or '60s, or beyond. For many, this long delay seems risky, because policies or rules could change before then or there could be legal pushback from EPA.
- Given the much appreciated direction of the F&I work group, the vision of Reg. 85 and changes to permitting processes and practices, we would like to avoid using VIP credits toward things that are already planned to be addressed.
- We also wanted to flag a few questions:
 - Is there an opportunity to continue to accrue credits in 2027 – 2030?
 - Can facilities that haven't implemented upgrades do so and earn credits through 2030?
 - Will there be a new VIP program with Reg. 85 2.0?

Here are the ideas we've brainstormed:

- Allow flexibility for VIP participants to choose which parameter(s) they can use credits toward: water quality-based limits (WQBELs, ADBACs) for nitrogen species (nitrite, nitrate+nitrite and ammonia), including on water supply segments; Reg. 85 2.0 limits; future water quality-based nutrients limits; TMDL waste-load allocations; or other parameters of concern (e.g., temperature, selenium, etc.). The analogy that came up is that we have a gift card for Taco Bell, but Taco Bell went out of business. Can we have a Visa gift card instead?
- Economics-based approach
 - Consider nutrient operational status (treatment configuration and associated technology-based nutrient treatment capability) at or before 2017, when evaluating F&I timeframes for VIP participants; expect continued operations at current VIP levels
 - If nutrients are not the priority pollutant(s) for the facility, delay applying VIP credits until nutrients are a priority
 - Consider any nutrient capital and operational expenses since 2017, as if new and in escalated dollars to current year, when considering economics for next step improvements (basically – set a baseline at 2017 conditions) - first extended compliance schedule
 - Credits confirmed through a formal CDPHE letter and applied through a long-term permit compliance schedule or integrated plan, when used.
 - Decided by discussions and agreements with the Feasibility & Implementation Unit and the Engineering Section. These decisions would be applied as long term permit compliance schedules.
 - Solve long term permit compliance schedule issue if permit becomes administratively extended outside the control of the permittee.
 - Once improvements are implemented, the division would work with the entity to begin a new economic evaluation to achieve the next highest level of treatment and timing, until the highest technology-based level (e.g., eBNR) is achieved. This would be a negotiated compliance schedule that would be determined by F&I and Engineering teams at the division and implemented into permits.

- Use VIP credits to offset monetary penalties from future NOV's (similar to the way supplemental environmental projects can be used now).
- Use VIP credits to move permit renewal timing.
- Use credits to support piloting new technologies (financial assistance, technical assistance).
- Create a certified ledger of credits that is convertible into future permit flexibility or watershed trading value
 - Could entities that have pre-emptively reduced their nutrient load "sell" or trade credits to other entities on the same receiving watershed in a manner that benefits both parties and the watershed?
 - Would depend on having a water quality trading program in place.
- Find a creative solution to work VIP Credits into watershed improvement projects that provide additional benefit to water quality and the discharger.
 - Utilize the credits to help spur a project along the river that will reduce overall loading to the river. This would probably go hand in hand with the trading of actual credits noted above.
 - Can we provide a year or two of credits to another entity, allowing them to find a less-costly project along the watershed that reduces pollutants equally or greater than an on-site project? This would have to translate to our permit renewal limits somehow, and might be tough to track and evaluate.
- Consider what it could look like to pool VIP credits toward a more holistic path forward, especially if it proves too challenging to determine a valuable use of credits to individual permittees. For example, consider removing Reg. 31.17 stream TP and TN standards (realizing this is a huge topic!).

Attachment #6



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

FROM: Jessica L. Kramer Jessica
Assistant Administrator Kramer

Digitally signed by Jessica
Kramer
Date: 2026.06.29
15:28:28 -04'00'

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.¹ 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.² 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

¹ 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.

² 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.³

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.⁴ 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,⁵ 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,

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

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

⁵ 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.⁶ 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.⁷ While statewide surveys⁸ 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.⁹ 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.¹⁰ 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.¹¹

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,

⁶ 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)

⁷ 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](#).

⁸ 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.

⁹ See *supra* 2

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

¹¹ 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 surveys¹² 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 reports¹³ 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

¹² See the EPA’s webpage [Sewage Sludge Surveys](#)

¹³ 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)¹⁴ or the land could be actively engaged in agriculture as rangeland or for growing crops.¹⁵ 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.¹⁶

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 PFAS¹⁷ 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).

¹⁴ 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](#)

¹⁵ 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 \(2018\)](#).

¹⁶ 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"](#)

¹⁷ 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.¹⁸

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 2021.¹⁹ 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.²⁰ 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.²¹

Monitoring requirements in permits:

To gather more information before requiring actions, several states have PFAS monitoring requirements. States like Washington,²² Oregon,²³ and Florida²⁴ 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 PFAS²⁵ in 2024,²⁶ 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

¹⁸ 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](#)

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

²⁰ 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).

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

²² See Senate Bill 5033 (WA, 2025-26)

²³ See House Bill 2947 (OR, 2025)

²⁴ See House Bill 1019 (FL, 2026)

²⁵ 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."

²⁶ See Senate Bill 292 (CT, 2024)

available sewage sludge management practice was not anticipated to cause widespread disruptions.²⁷ 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.²⁸

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.²⁹ 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.³⁰ 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.³¹ 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.³²

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.³³ Additionally, most farms land applying

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

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

²⁹ See Legislative Document 1911, 130th Maine Legislature (ME, 2022)

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

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

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

³³ See *supra* 5

sewage sludge grow crops for energy generation or other crops that are not meant for human consumption.³⁴ 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.³⁵

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.³⁶ 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,³⁷ 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

³⁴ See [National Biosolids Data Project, National Summary \(2018\)](#)

³⁵ 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.

³⁶ See *supra* 13

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

disposal units.³⁸ 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*.³⁹

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.⁴⁰

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) program⁴¹ and the Water Infrastructure Finance and Innovation Act (WIFIA) program.⁴²

³⁸ 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.

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

⁴⁰ 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.

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

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