LAND APPLICATION OF BIOSOLIDS: TRENDS AND PERSPECTIVES

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Land Application of Biosolids: Trends and Perspectives







Introduction, Perceptions

Occurrence of Organic Contaminants of Concern (COCs)

COCs in biosolids processing examples

COC Fate in a subset of biosolids-applied sites

Feed Crop Uptake Snapshots: Greenhouse and Field

Perspectives and a Path Forward



EPA Office of Inspector General Report 2022

EPA Unable to Assess the Impact of Hundreds of Unregulated Pollutants in Land-Applied Biosolids

- The EPA identified 352 pollutants in biosolids that cannot be considered for regulation due to either lack of data or risk assessment tools.
- 61 pollutants designated as acutely hazardous, hazardous or priority pollutants plus pharmaceuticals, steroids, etc.



Response from USEPA Office of Water and Office of Enforcement and Compliance Assurance on Draft Report and OIG Evaluation

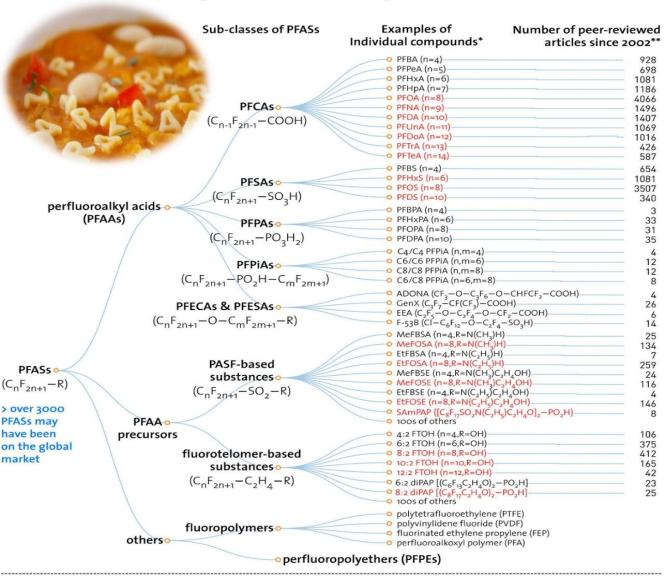
(Appendix D of OIG Report)

"We are concerned about how the science is presented in the OIG report. It is biased and raises alarm ... and is taken out of context.

.....The presence of a pollutant in biosolids alone does not equate to scientific risk, but the EPA's Biosolids Program is working hard to prioritize its risk assessment work for known but not yet regulated pollutants."



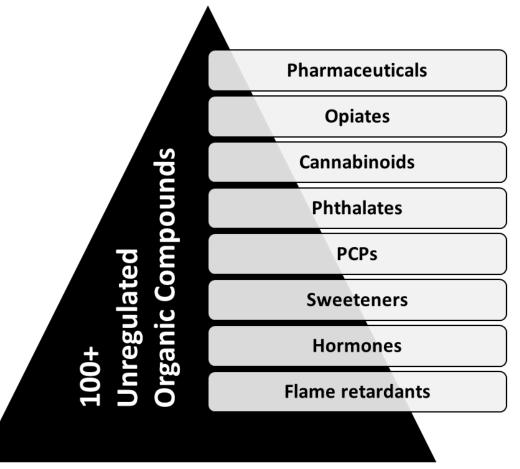
Per- & Polyfluoroalkyl Substances



PFASs in RED are those that have been restricted under national/regional/global regulatory or voluntary frameworks, with or without specific exemptions (for details, see OECD (2015), Risk reduction approaches for PFASs. http://oe.cd/1AN).

Source: Wang et al., 2017, ES&T, 51:2508-2518

Pharmaceuticals & personal care product chemicals (PPCPs) and still others

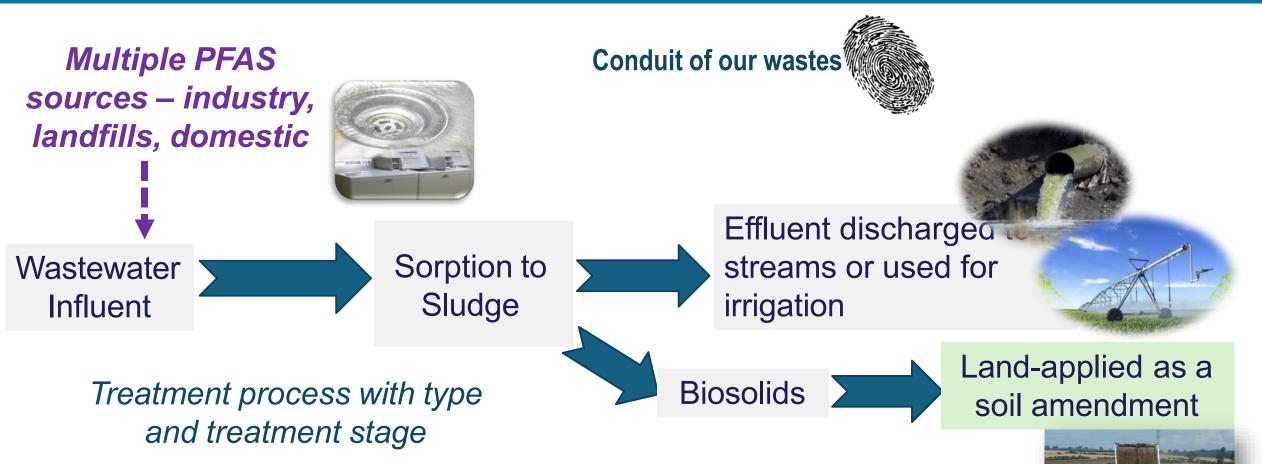


Reflects Innovations and Societal Use



^{**} The numbers of articles (related to all aspects of research) were retrieved from SciFinder® on Nov. 1, 2016.

MANAGING CHEMICALS OF CONCERN (COCS) IN WASTEWATER AND BIOSOLIDS MANAGEMENT



COCs entering our WWRFs exit via effluent or sludge partially altered to other compounds or unaltered – most are NOT regulated



Most recent regulatory activity have been focused on PFAS

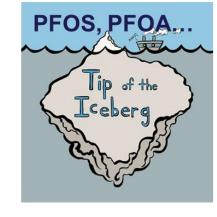
APRIL 10, 2024 U.S. EPA SETS PFAS MAXIMUM CONCENTATION LEVELS (MCLS) IN PPT (NG/L)

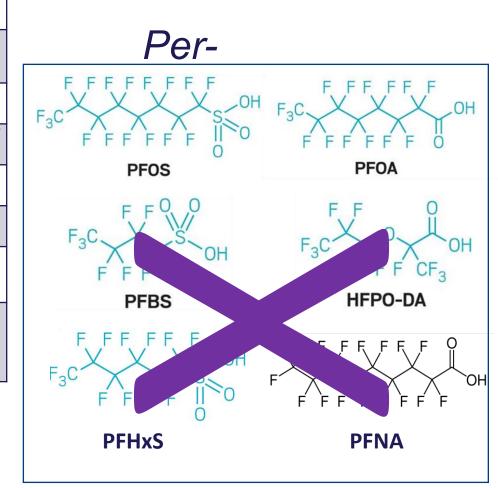
PFAS	MCLG	MCL (enforceable levels)
PFOA (C8)	Zero	4.0 ppt
PFOS (C8)	Zero	4.0 ppt
PFNA (C9)	10 ppt	10 ppt
PFHxS (C6)	10 ppt	10 ppt
PFBS (C4)	1000 ppt	1000 ppt
HFPO-DA (GenX Chemicals)	10 ppt	10 ppt
Mixtures of 2 or more PFNA, PFHXS, PFBS, and HFPO-DA		ess) Hazard Index asured concentration

MCLG = maximum contaminant level goals



2025





REGULATED OR NOT WE HAVE TO ADDRESS PUBLIC/COMMUNITY PERCEPTION/CONCERNS



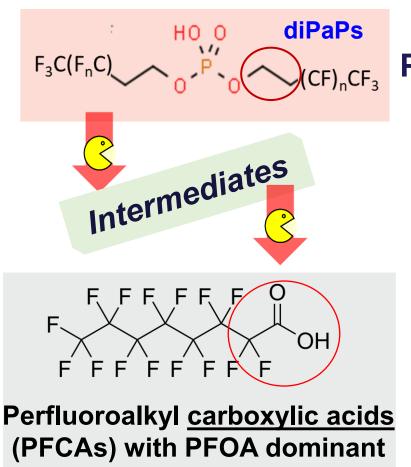
PFAS 'news' has revied/escalated concerns about COCs in biosolids.



PFAS TRANSFORMATION IN SOLIDS PROCESSING IN WASTEWATER TREATMENT PLANTS AND AFTER LAND APPLICATION: A CASE OF MULTIPLICATION

C8 Fluorotelomer-based Example

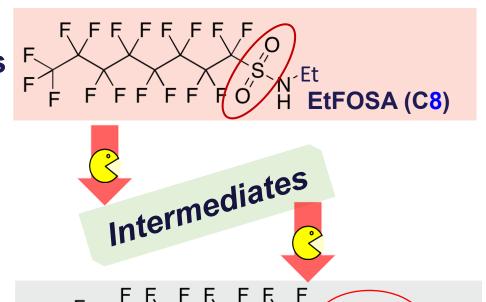
C8 Electrochemically-derived Example

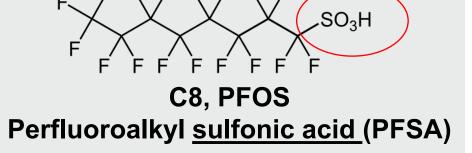


Precursors to PFAAs

Multiple steps, pathways, and rates

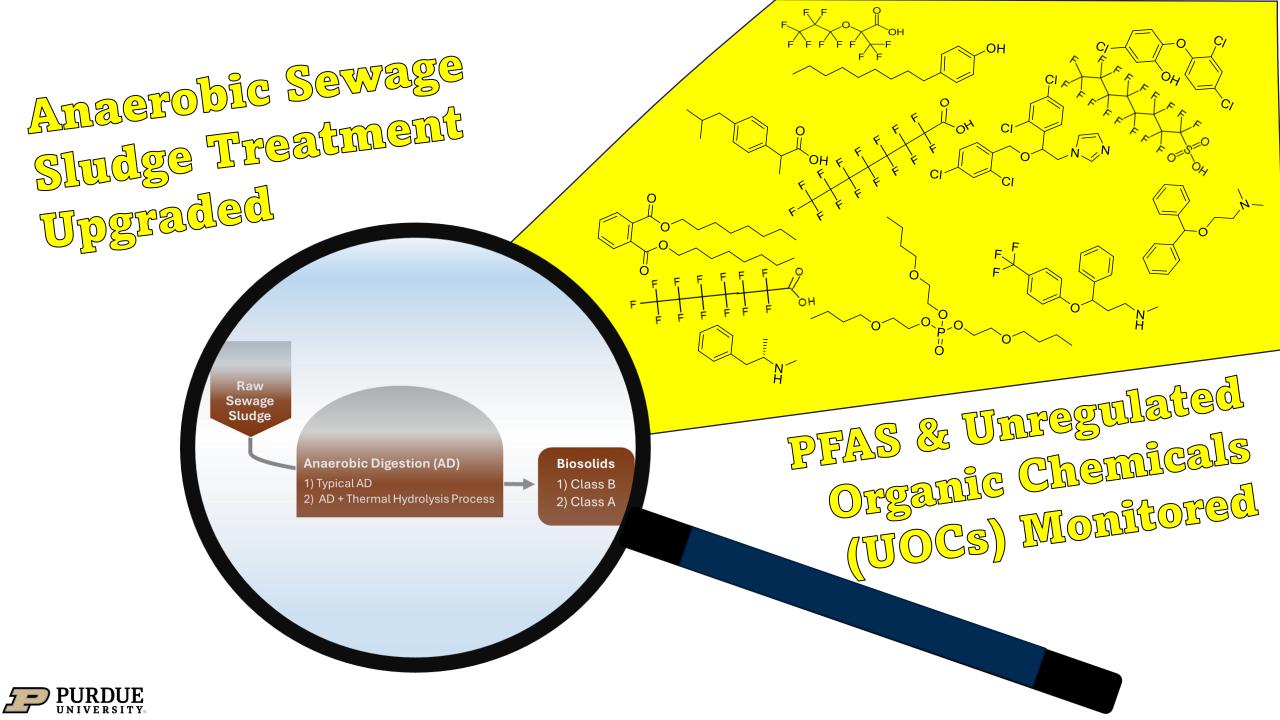
Intermediates and
Terminal Metabolites
(the PFAAs)
More mobile than
precursors



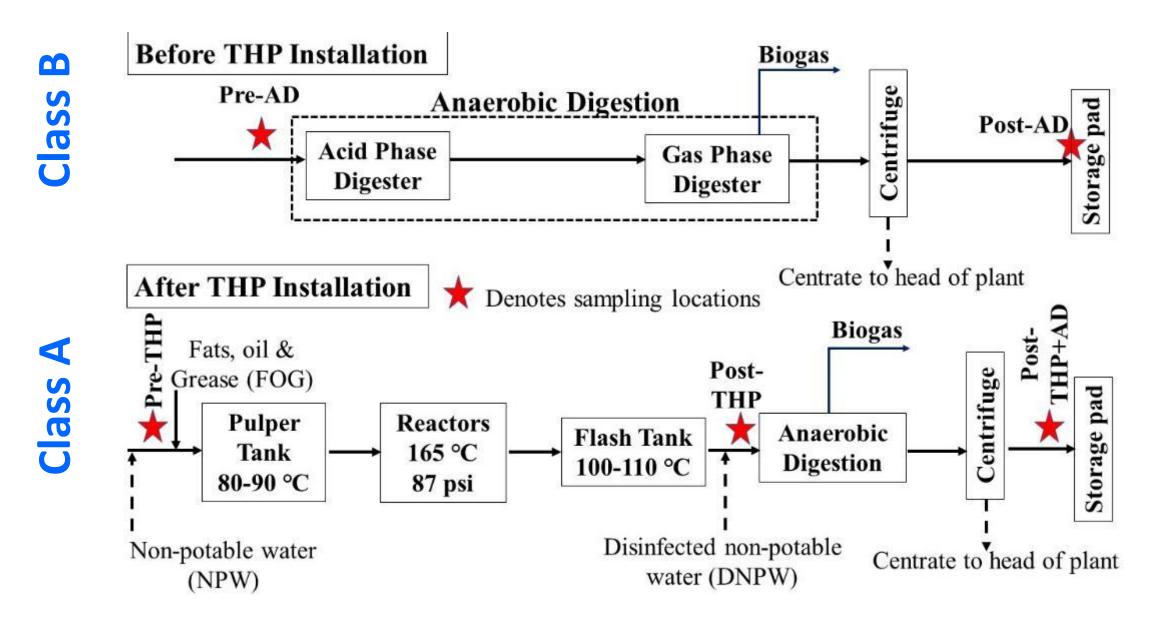


PFCAs + PFSAs = Perfluoroalkyl acids (PFAAs)





PFAS Transformation in Solids Processing to Biosolids for Application





Thermal Hydrolysis Process (THP)

Biogas Production



↑ TS %



Class A Biosolids



† Digester Loading Capacity





- ✓ Biogas production is used towards system operation
- ✓ Higher Total Solids reduces hauling costs (lower water weight) and the associated greenhouse gasses
- ✓ Class A biosolids are land applied as fertilizer
- ✓ The increased biosolid treatment capacity and reduces what may be going to incineration or landfilling

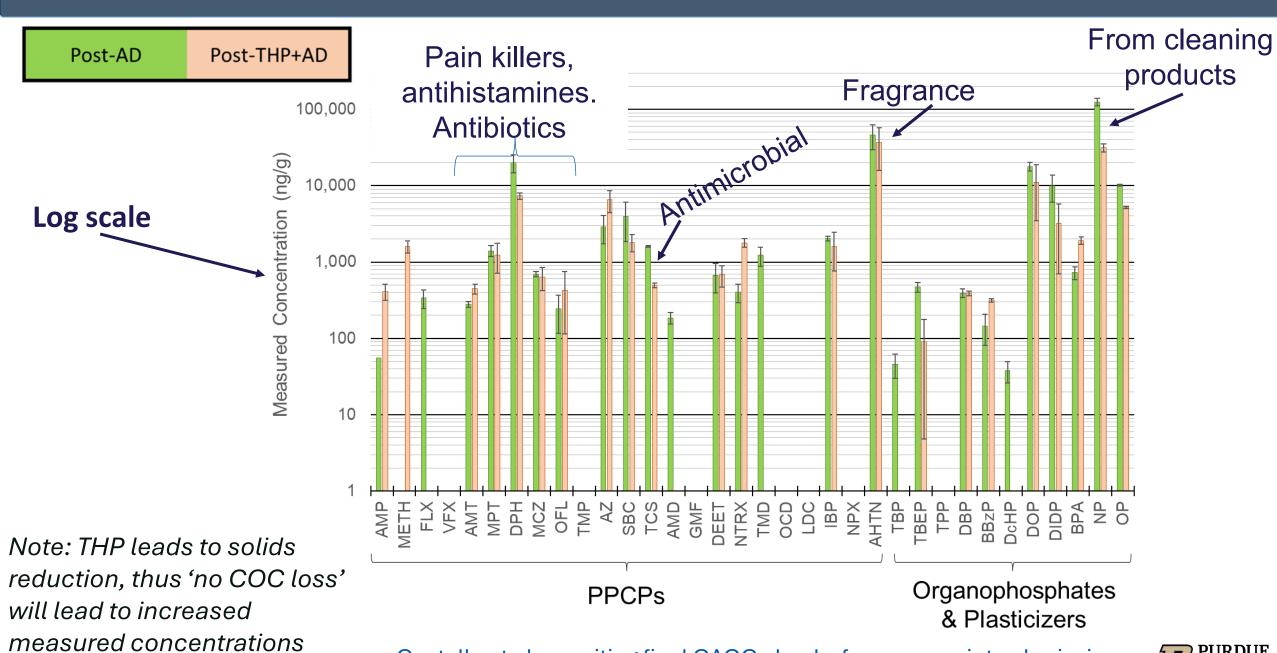




Sustainability

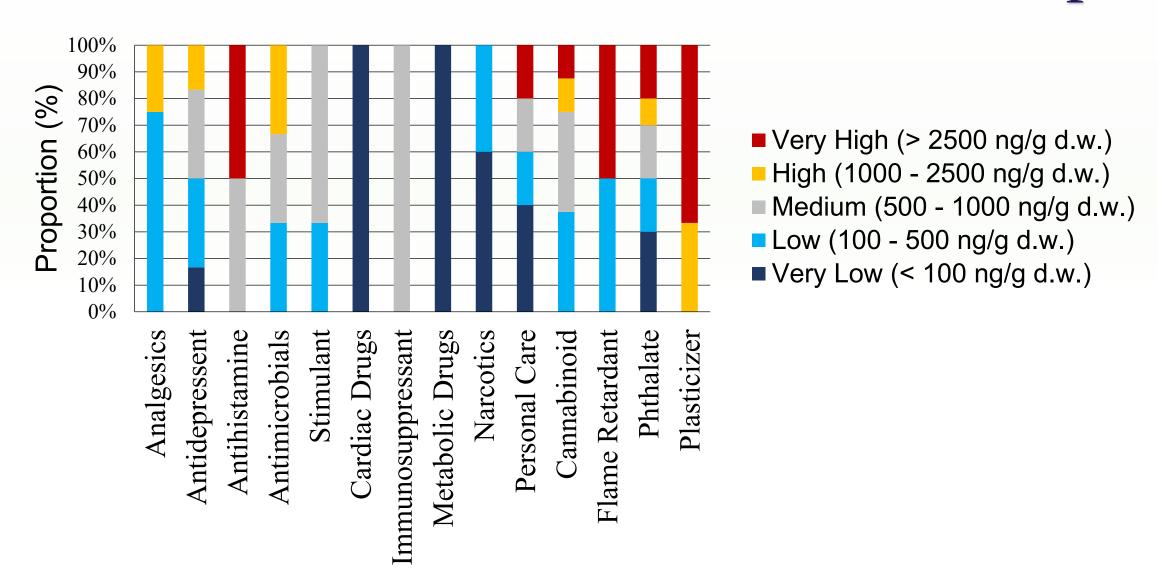


Post-AD and Post THP+AD



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Class A Biosolids: THP Product Example

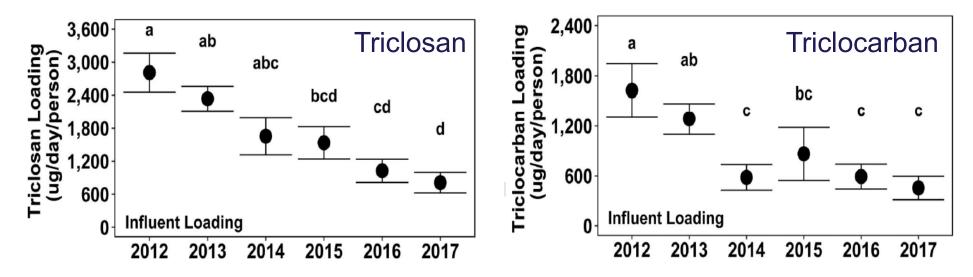




We have experienced similar trends with other chemicals

TRICLOSAN & TRICLOCARBAN (ANTIMICROBIAL AGENTS)

(INFLUENT: μG/DAY/PERSON VS SAMPLING YEAR 2012-2017)



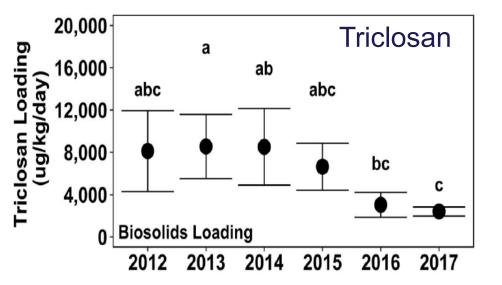
- Fingerprint of regulations and consumer choices
- Consumer choices can lead to some volunteer removal from products prior to regulations
- Regulations in Sept 2016 and Dec. 2017 eliminated their use in many products

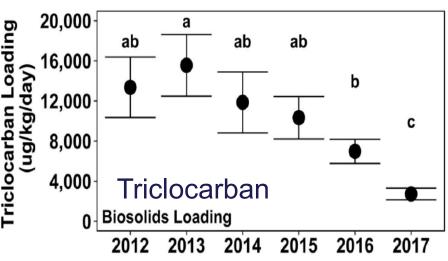


We have experienced similar trends with other chemicals

TRICLOSAN & TRICLOCARBAN IN BIOSOLID (ANTIMICROBIAL AGENTS)

(BIOSOLIDS LOADING: μG/DAY/PERSON VS SAMPLING YEAR 2012-2017)



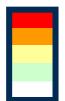


- Decline over time also observed in biosolids
- Consumer opinions and choices make a difference



Considering Hazards (EPA HCD, Comptox)

Concentration Range



Very High (> 2500 ng/g d.w.) High (1000 - 2500 ng/g d.w.) Medium (500 - 1000 ng/g d.w.) Low (100 - 500 ng/g d.w.) Very Low (< 100 ng/g d.w.)

Hazard Rating					
VH - Very High	H - High	M - Medium	L - Low		

Compound Identification		Human Health Effects		Ecotoxicity (Aquatic)		Fate (QSAR Model)
Name	Class	EDC	Dev	Acute	Chronic	Bioacc
Methylparaben	DCD.	Н	Н	M	Н	L
Tonalide	PCPs	Н	H	H	VH	L
Dicyclohexyl phthalate		Н	Н	Н	Н	Н
Dihexyl phthalate		Н	Н	Н	VH	L
Di-n-octyl phthalate	Phthalate	Н	M	Н		VH
Dibutyl phthalates		Н	Н	VH	H	M
Dinonyl phthalate		Н	H	Н		L
Benzyl butyl phthalate		Н	Н	VH	VH	Н
Di(2-ethylhexyl) phthalate		Н	Н	H	VH	VH
Diisodecyl phthalate		Н	Н	VH		L
Bisphenol A		Н	Н	H	VH	L
Nonylphenol	Plasticizer	Н	M	VH	VH	Н
Octylphenol		Н	H	VH	VH	M
Triphenyl phosphate	Flame	Н	L	VH	VH	Н
Tris(2-butoxyethyl) phosphate	Retardant	Н	Н	M	L	L

Name	Class	EDC	Dev	Acute	Chronic	Bioacc.
Acetaminophen	Analgesic	L	L	M	m VH	L
Doxepin		Н	H	Н		L
Venlafaxine		Н	H	H		L
Fluoxetine	Antidepressant	L	Н	VH	VH	M
Amitriptyline +		Н	Н	VH	VH	Н
Maprotiline		11	11	V 11	V 11	11
Diphenhydramine	Antihistamine	L	L	Н	VH	M
Miconazole	Antimicrobial	L	L	VH	VH	M
Triclosan	Antimicrobiai	Н	M	VH	m VH	L
Cannabigerol		Н	Н	VH		L
delta-8-		Н	Н	VH		M
Tetrahydrocannabinol	Cannabinoid	Н	H	VH		M
Tetrahydrocannabivarin		Н	H	VH		M
Caffeine		Н	Н	L	H	L
Ibuprofen		Н	Н	L	VH	L
Cannabichromene		Н	Н	VH		M
Cannabicyclol		Н	Н	VH		М
delta-9-		Н	Н	VH		M
Tetrahydrocannabinol		П	П	VΠ		IVI
Cannabidiol		Н	H	VH		M
Cannabinol		Н	Н	VH		M
Amiodarone		I	Н	VH	Н	M
Hydroxychloroquine	Other Pharm.	Н	Н	Н	Н	L
Simvastatin		L	Н	VH		I
Codeine		Н	Н	Н		L
Fentanyl	76.T	Н	Н	VH		L
Methadone	Narcotics	Н	Н	Н	VH	M
Naltrexone		Н	Н	Н		L 17

- Concerns are for aquatics
- Some pharms, fragrances and plasticizers are of high concern



MOVING ON TO PFAS IN BIOSOLIDS PROCESSING

• Short chain homologues such as PFBS substituted PFOS

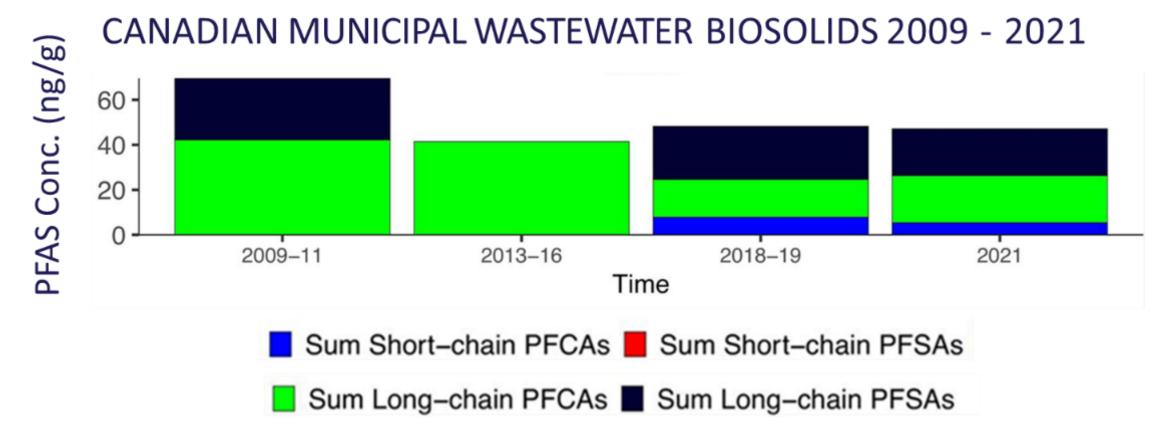
U.S. EPA Chain Length Categories

# of Carbons	4	5	6	7	8	9	10	11	12
PFCAs	Short-chain PFCAs				Long-chain PFCAs				
	PFBA	PFPeA	PFHxA	PFHpA	PFOA	PFNA	PFDA	PFUnA	PFDoA
PFSAs	PFBS	PFPeS	PFHxS	PFHpS	PFOS	PFNS	PFDS	PFUnS	PFDoS
	Short-cha	in PFSAs			Lo	ng-chain Pl	FSAs		

•Precursor example: Fluorotelomer-based substitutes ≤ C6 example replacing C8



PFAS Occurrence in biosolids over time



- Except for PFOS, long- chain PFAS generally decreased over time.
- PFOS did not change with time indicating slow response to phase-outs/regulations and PFOS' overall stickiness.



USA EXAMPLE: PFAS IN 2018-2025 BIOSOLIDS (PPB DRY WEIGHT)

	PFAS	~Min	~Max
Porfluoroallad	PFOS	< LOD	130
Perfluoroalkyl acids (PFAAs)	PFHxS	< LOD	50
-terminal metabolites	PFOA	< LOD	30
	PFHxA	< LOD	30
	6:2 FTS	< LOD	15
PFAA precursors/	8:2 FTS	< LOD	30
intermediates	MeFOSAA	< LOD	100
L	EtFOSAA	< LOD	50
	7:3 FTCA	< LOD	100
PFAA intermediates	5:3 FTCA	< LOD	220
	3:3 FTCA	< LOD	220

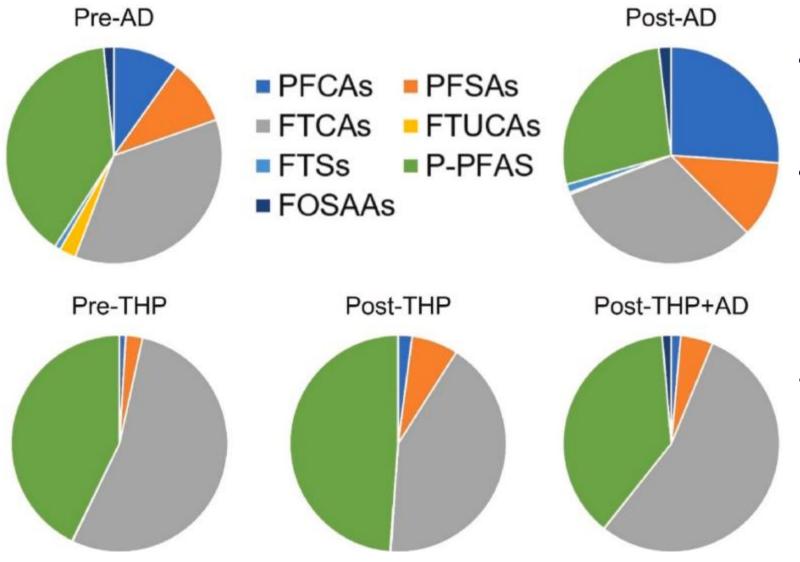
Some Additional Precursors

PFAS	~Min	~Max
6:2 diPAP	10	400
8:2 diPAP	0	200
6:2 PAP	20	340
6:6 PFPI	0	9
6:8 PFPI	0	4.4

 For most utilities, identified precursors are typically at least 75% of the quantifiable PFAS fluorine mole balance



PFAS Transformation Example in Solids Processing to Class B Biosolids



AD: Anaerobic Digestion

- Bulk of the PFAS are precursors and most not measured in the current EPA 40 targets list
- Digestion to remove pathogens, etc. leads to PFAS conversion to PFAAs (orange and blue)

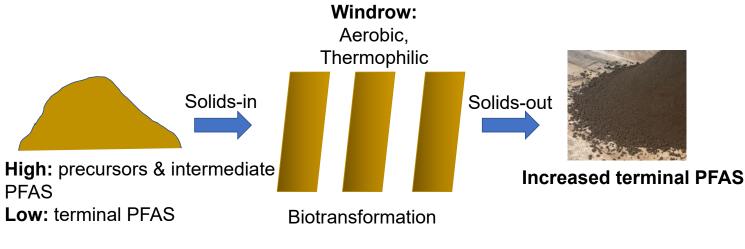
THP + AD

 THP prior to AD reduced/slowed transformation to PFAAs leaving a larger fraction of FTCA intermediates in the final biosolids.

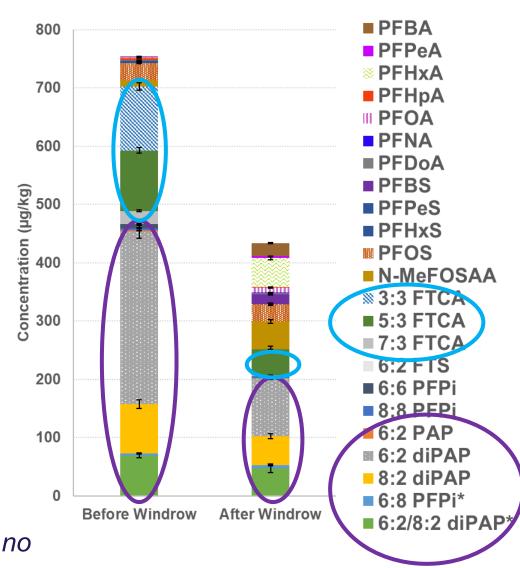


PFAS Transformation in Solids Processing to Biosolids for Application Solids are from a Municipal WRRF that uses THP + AD Treatment

Windrow Composting

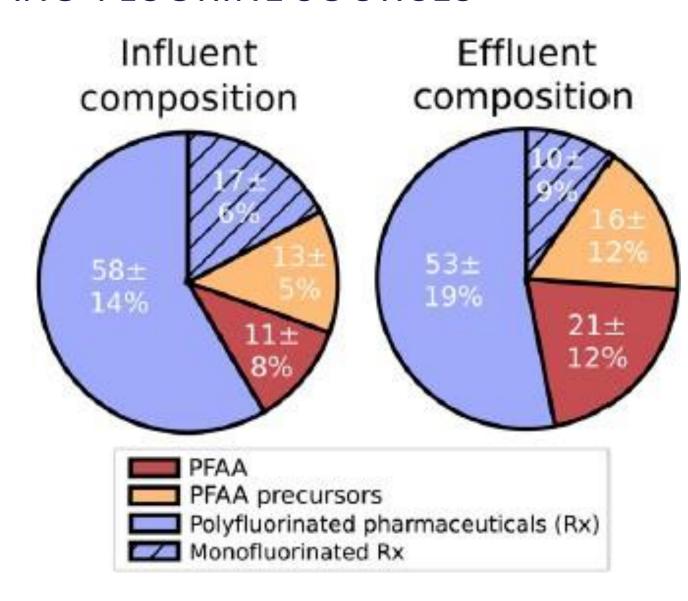


- Overall, moles of PFAS detected decreased by > 40% with windrow composting
- FT precursors, intermediates, and even terminal PFAS decreased after windrow composting
- Possible reasons
 - Expected biotransformation, yes
 - Volatilization, highly likely
 - Heat + mineral-induced oxidation? Initial data suggests no



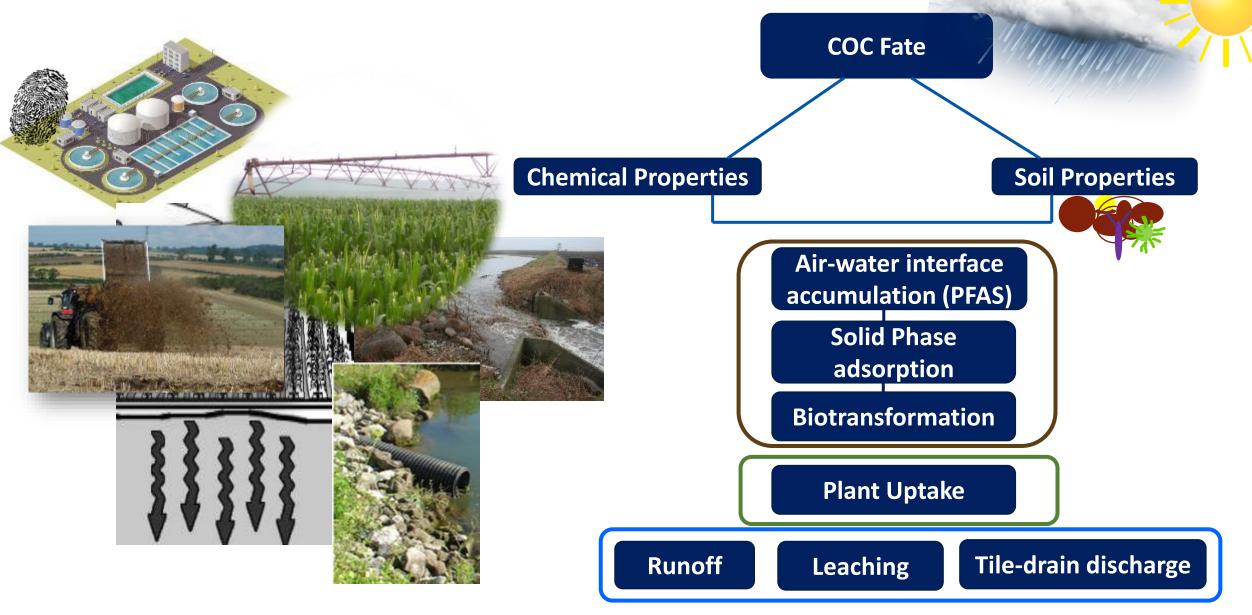
WHAT ABOUT TOTAL ORGANO-FLUORINE SOURCES

- Only about 25% may be PFAS
- Fluorinated pharmaceuticals make up the bulk of organofluorine in wastewater (snapshot from 8 facilities)
- Total organo-fluorine does not change much between influent and effluent



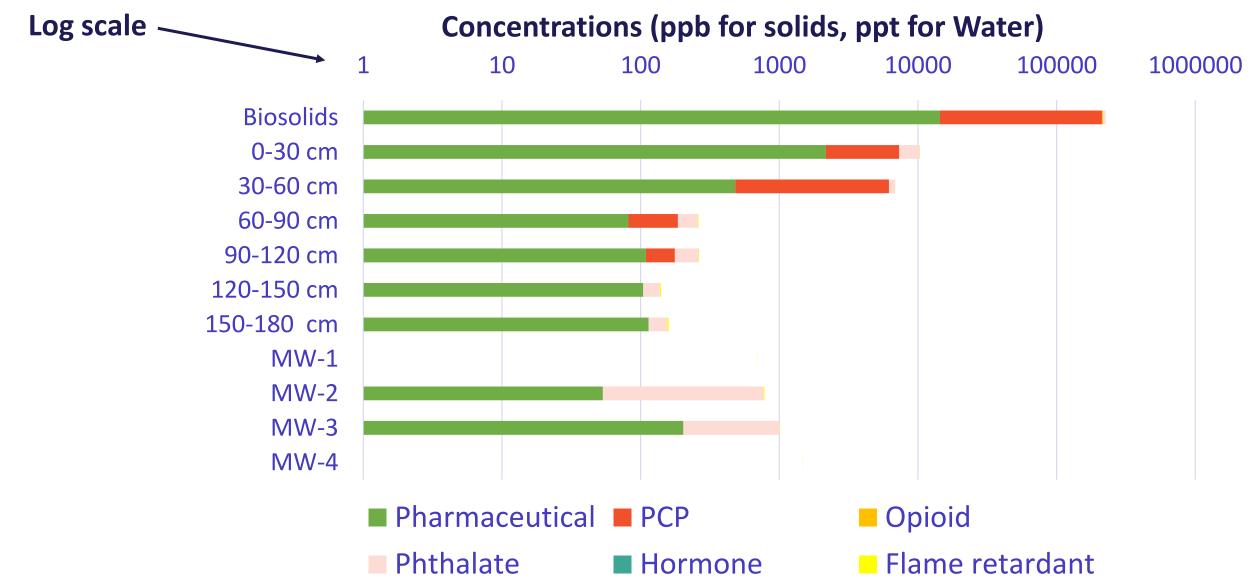


COC FATE AFTER DISCHARGE/APPLICATION TO LAND



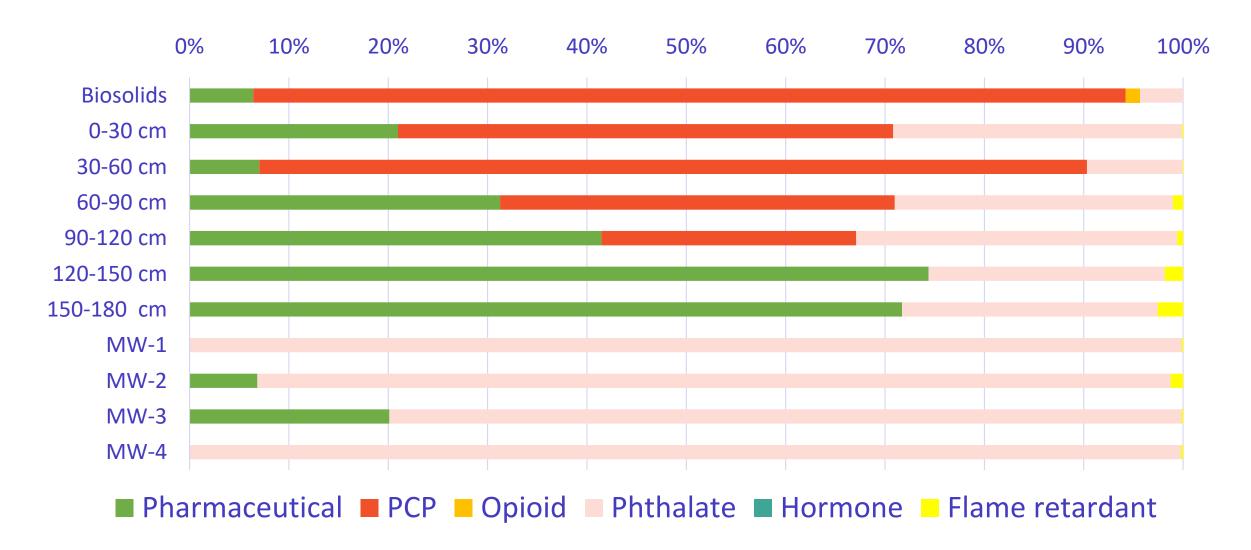


40-Y DEDICATED LAND DISPOSAL SITE (WESTERN USA): NON-PFAS COCS





40-Y DEDICATED LAND DISPOSAL SITE (WESTERN USA): NON-PFAS COCS











Non-PFAS Mobility at DLD

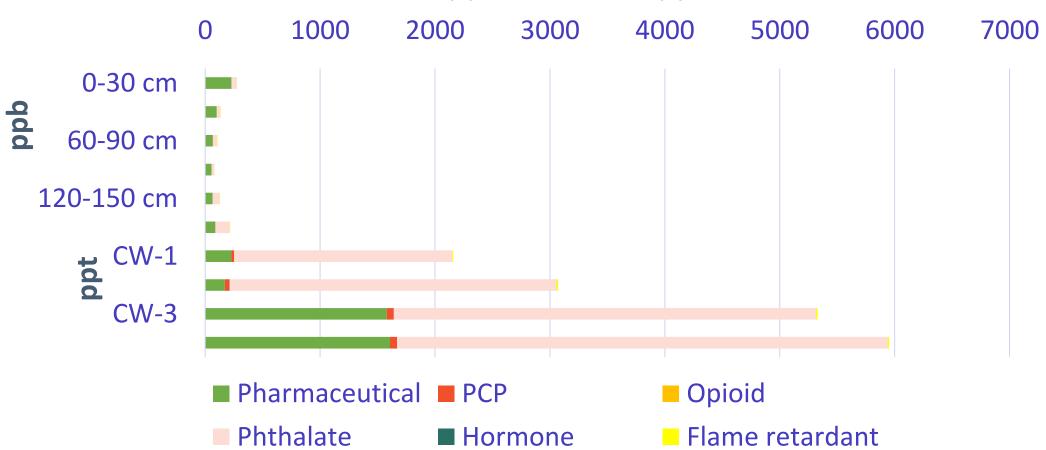
Monitoring Well Samples

			water W2 (ng/l)			Present in biosolids
	Salicylic acid	n.d.	n.d.	75	n.d.	
Pharmaceuticals	Sebacic acid	n.d.	32	39	n.d.	
	Azelaic acid	n.d.	21	89	n.d.	
DCD _C	DEET	18	67	47	21	
PCPs	Tributyl phosphate	n.d.	7.9	1.9	4.8	
	Benzyl Butyl phthalate	227	297	316	415	
Phthalates	Di(2-ethylhexyl) phthalate	96	n.d.	155	352	
Pillialates	Dibutyl phthalates	178	211	168	348	
	Diisodecyl phthalate	10	n.d.	38	22	
	Triphenyl phosphate	1.0	9.8	1.6	3.0	
Flame retardants	Tris(2-butoxyethyl)					
	phosphate	457	434	600	633	
	Total	987	1080	1530	1800	



CONTROL SITE: NON-PFAS COCS



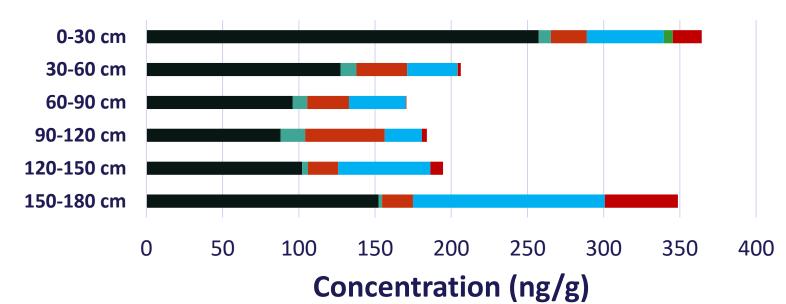


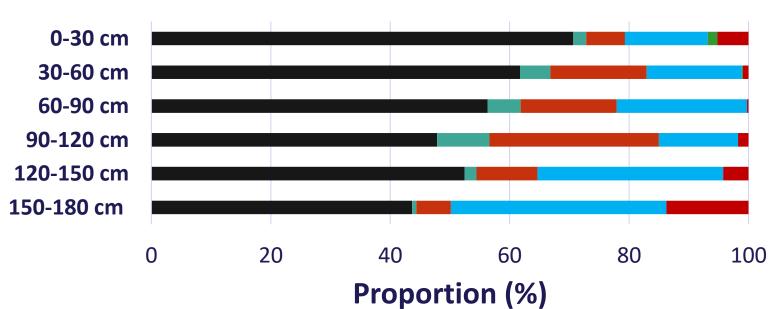
- Pharmaceuticals include some natural occurring ones in nature)
- PCP includes DEET



Persistence of Non-PFAS COCs one year post biosolids application, dry farm

- Pharmaceuticals
- PCPs
- Opioids
- Phthalates
- Sweeteners
- Cannabinoids
- Hormones
- Flame retardants
- Rubber derivatives

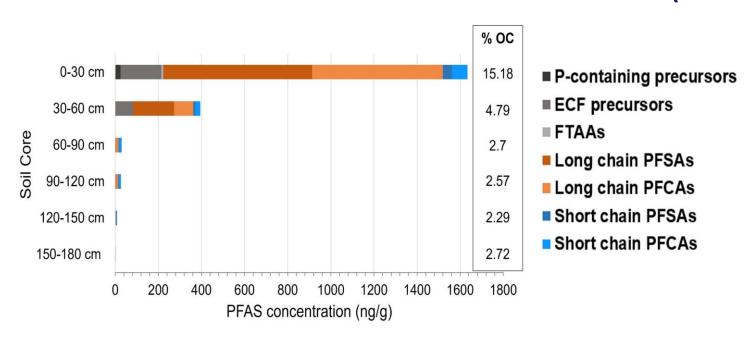


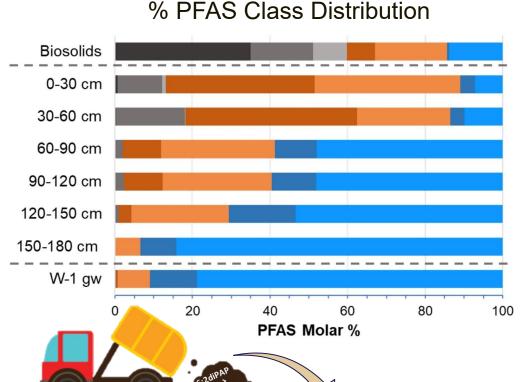






40-Y DEDICATED LAND DISPOSAL SITE (WESTERN USA)





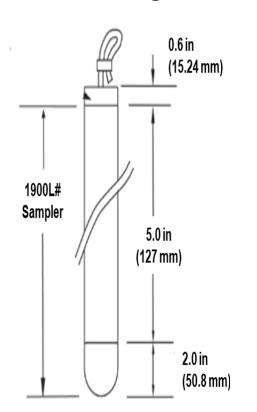
- Repetitive (annual) and high rate of biosolids application leads to PFAS and organic carbon (% OC) accumulation in soil over time
- Most precursors breakdown to PFAAs within 1 year
- Long-chain PFAS retained in the upper soil profile
- Short-chain PFAAs dominate what is getting to groundwater
- Interestingly, only PFOA exceed new EPA MCLs

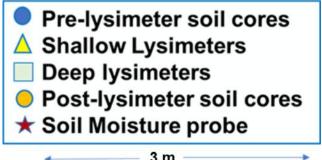


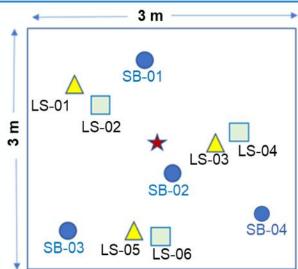


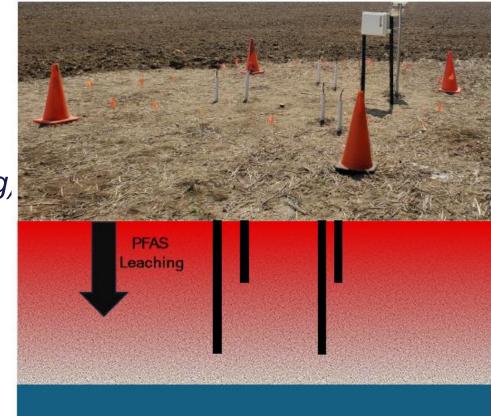
BIOSOLID-APPLIED MIDWEST AGRICULTURAL SITE

- Agricultural Field ~40 y of land-application
- Agronomic rate for corn biannually, last app 2022
- Crops cleared so transpiration not a factor
- Depth to water table: 4.3 m (pre-installation river flooding)
- 3-mo study with 2 ft & 4-ft suction cup lysimeters
- •58 PFAS targeted







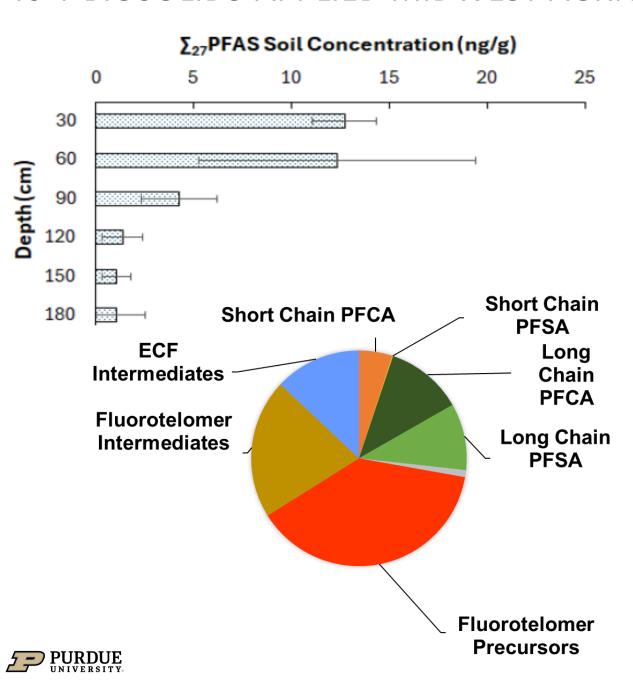


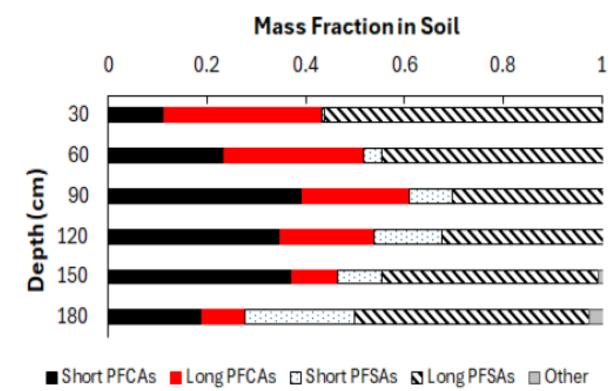
Depth (cm)	% OC	Type, % Clay
0-60	2	Loam, 15% clay
60-110	2.3	Silt loam, 20%
110-180	< 1.5	Loam, 17%



WRF 5214 (CDM Smith, Purdue)

40-Y BIOSOLIDS-APPLIED MIDWEST AGRICULTURAL SITE: PFAS IN SOILS & BIOSOLIDS



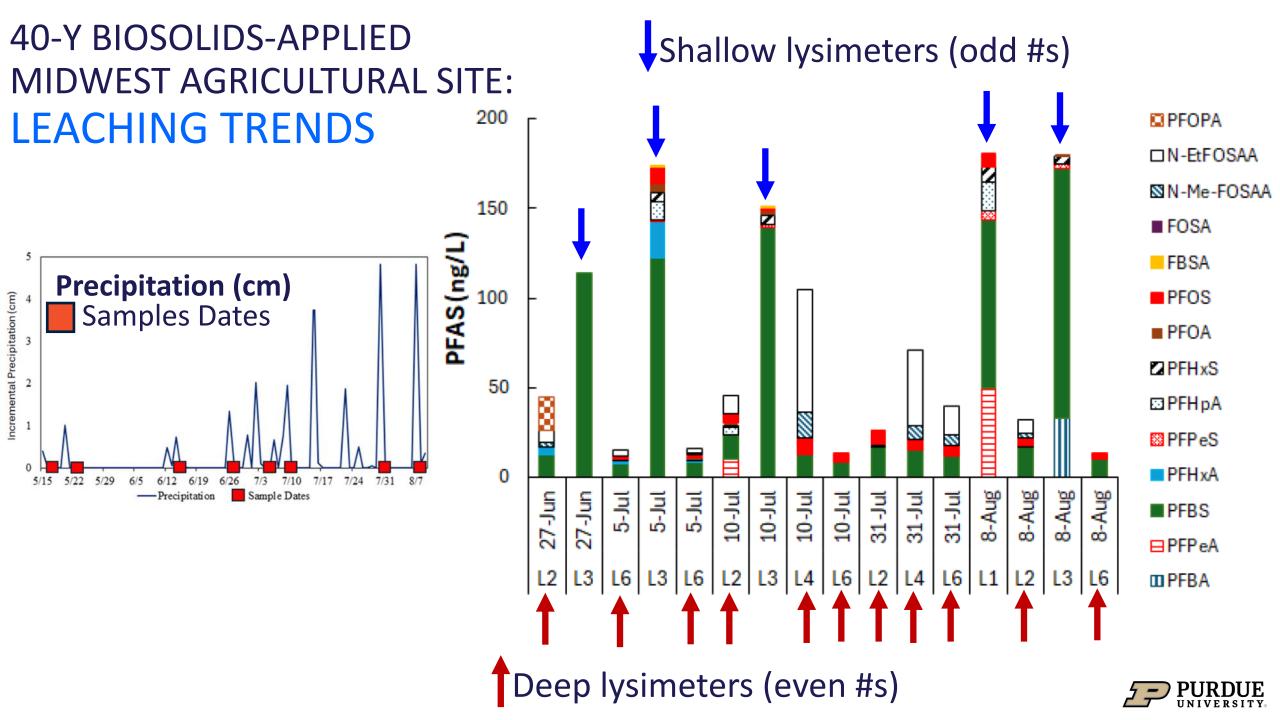


- Precursors degrade, most < 1-y post application (not ECFs)
- Long-chain PFAS retained in the upper soil profile



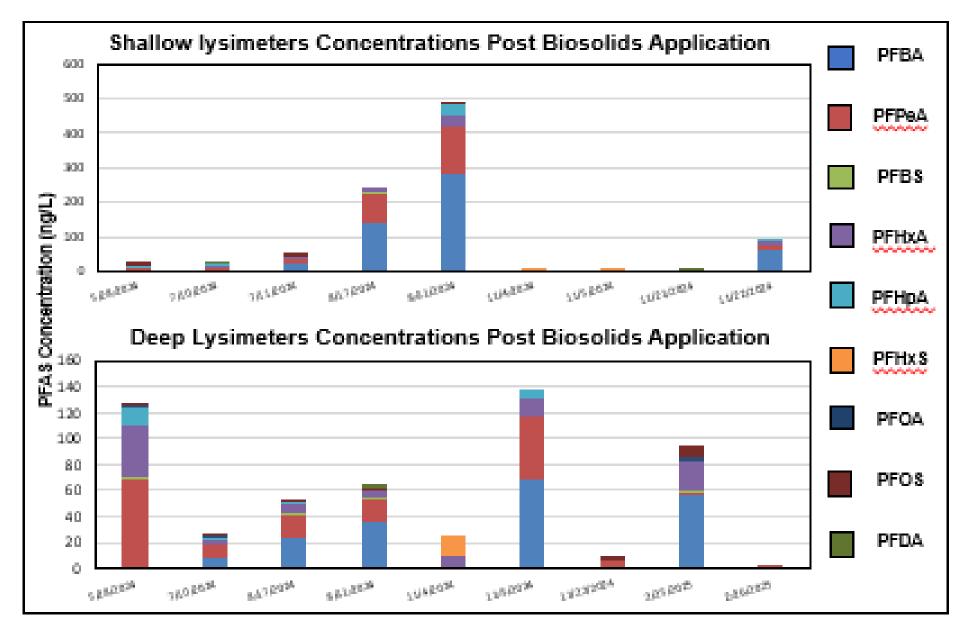
WRF 5214 (CDM Smith, Purdue)





BIOSOLIDS-APPLIED MIDWEST AGRICULTURAL SITE:

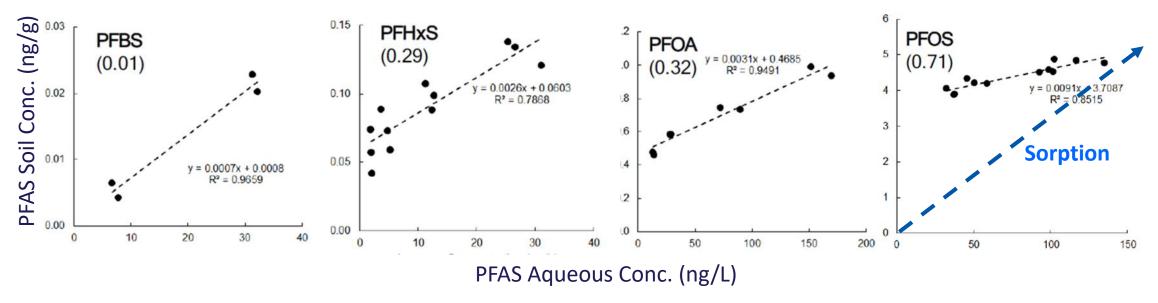
FIRST TIME APPLICATION LEACHING TRENDS





SOIL FACTORS IMPACTING TRANSPORT: DESORPTION HYSTERESIS

Desorption Isotherms from Historic Biosolids-applied soil



Desorption hysteresis - chemical release (desorption) does not mirror chemical adsorption

- Desorption hysteresis increases with increasing chain length
- Air-water interfacial retention increases with increasing chain length
 - Contributes to longevity of long-chain PFAS in the soil profile
 - Decreases movement to groundwater





Air-Water

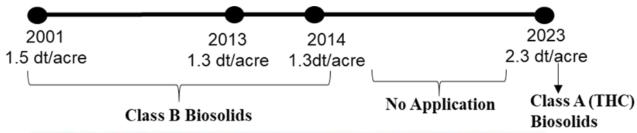
Interface

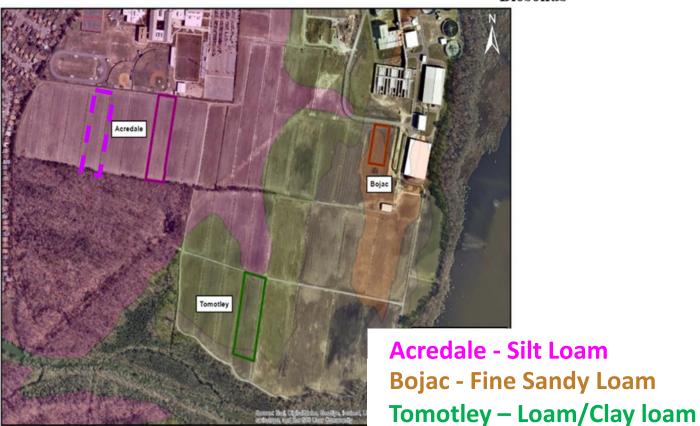
Soil Particle

Air-pore

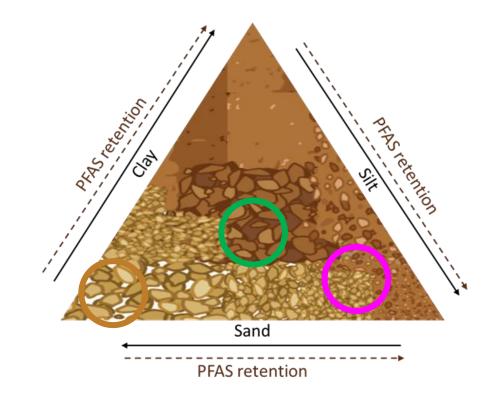


EAST COAST USA STUDY SITE





- Corn/soybean rotations
- Municipal biosolids: Class B to Class A
- 3 soil types
- Organic carbon ~ 2% in surface soils decreased with depth, Lower average in Bojac Sandy loam

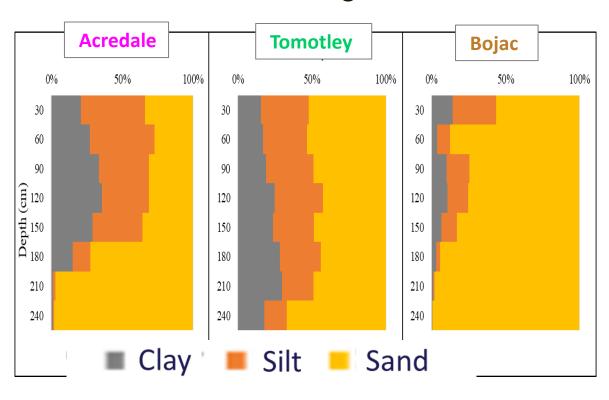


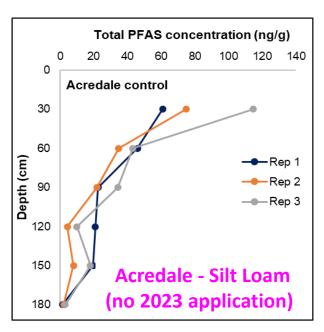


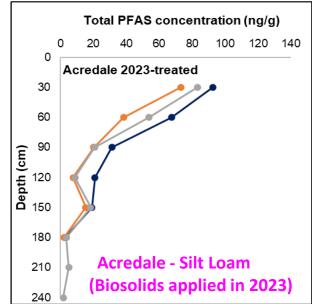


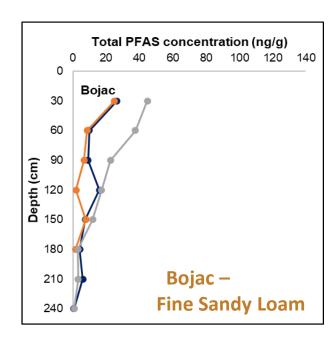
EAST COAST USA STUDY SITE

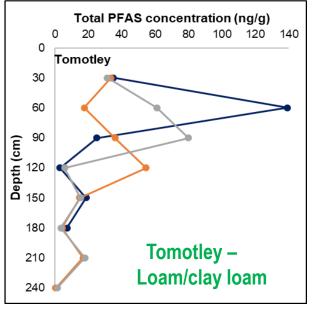
- PFAS profiles in cores taken prior to 2023 application were not statistically different
- PFAS longevity
- Sandy soil less retention
- Finer texture soil, greater retention











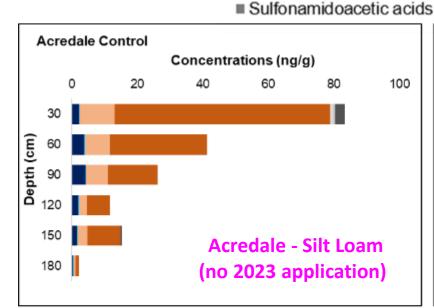
EAST COAST USA STUDY SITE

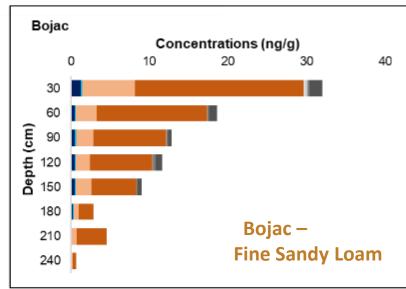
Short-chain PFCAs
 Long-chain PFCAs
 Long-chain PFSAs
 P containing FT precursors
 Sulfonamides

- Long-chain PFAS dominated the upper soil profile
- PFAS in surface soil subject to runoff and available for uptake
- Less PFAS residing in the soil for the loan and sandy loam

Acredale - Silt Loam
Bojac - Fine Sandy Loam
Tomotley - Loam/Clay loam

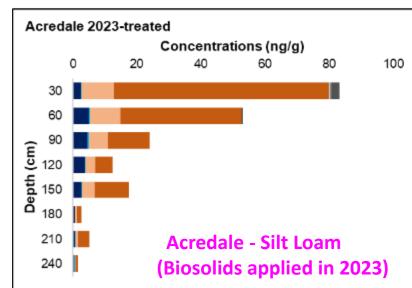


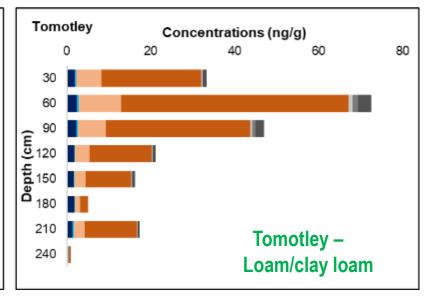




Sulfonamido ethanols

PURDUE

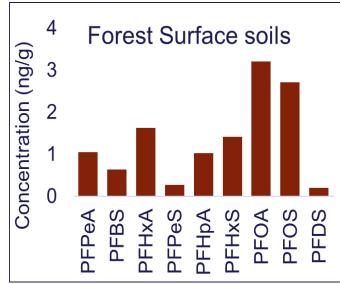




EAST COAST STUDY SITE: OTHER PFAS SOURCES

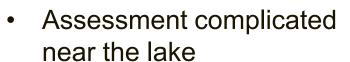


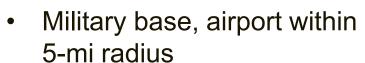


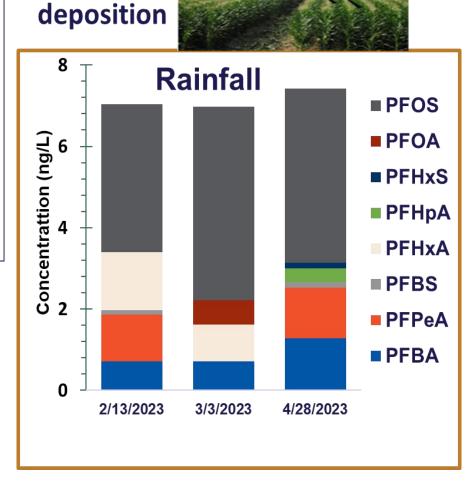




Tomotley







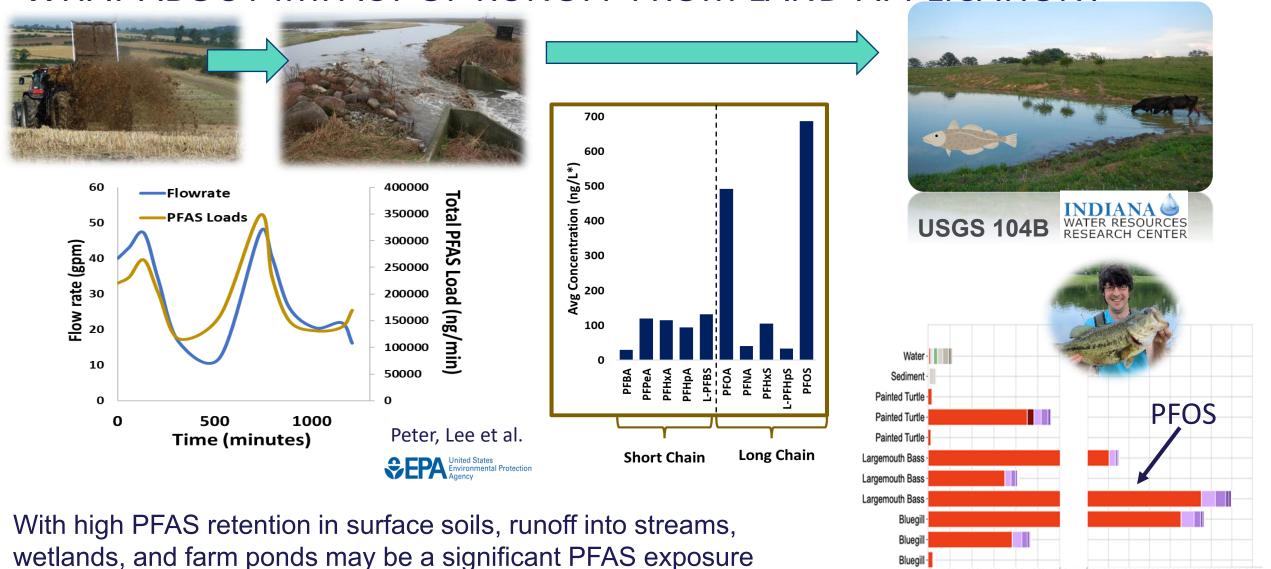
Wet/dry



201 - 620

2025 Banned Biosolids
Application on this site

WHAT ABOUT IMPACT OF RUNOFF FROM LAND-APPLICATION?



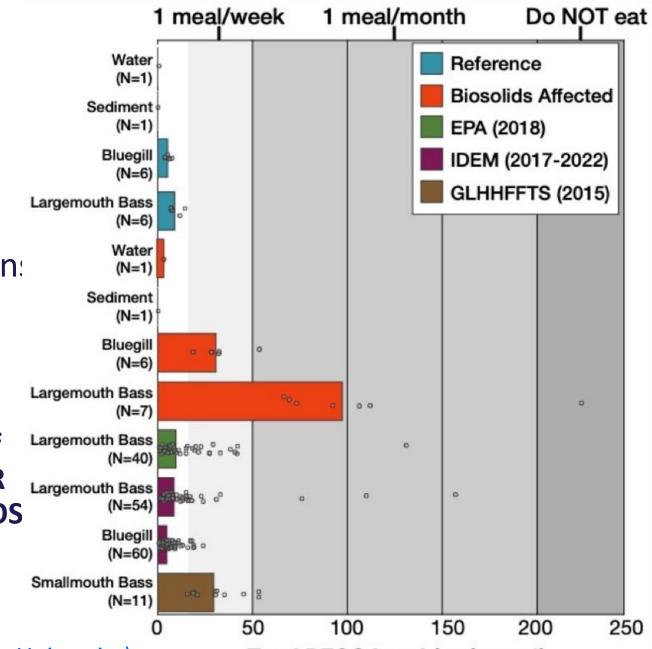
pathway to fish, wildlife, and grazing cattle, and subsequently, humans

PFAS (ng/g)* Hoskins et al.



FARM POND FISH MUSCLE FROM BIOSOLID SITE HAD HEAVY PFAS LOADS

- Greater PFOS burdens at Biosolids Site than at Reference Site
- Reference site resembled concentrations in larger monitoring efforts
- Some perspective:
 - At geometric mean for Biosolids Site
 - ONE 8 OZ MEAL OF BASS = 30 DAYS of DRINKING WATER AT 27,840 X HIGHER THAN EPA INTERIM GUIDELINE FOR PFOS





Total PFOS Load (ng/g ww*)

CROP UPTAKE: PFAS EXPOSURE AND BIOACCUMULATION

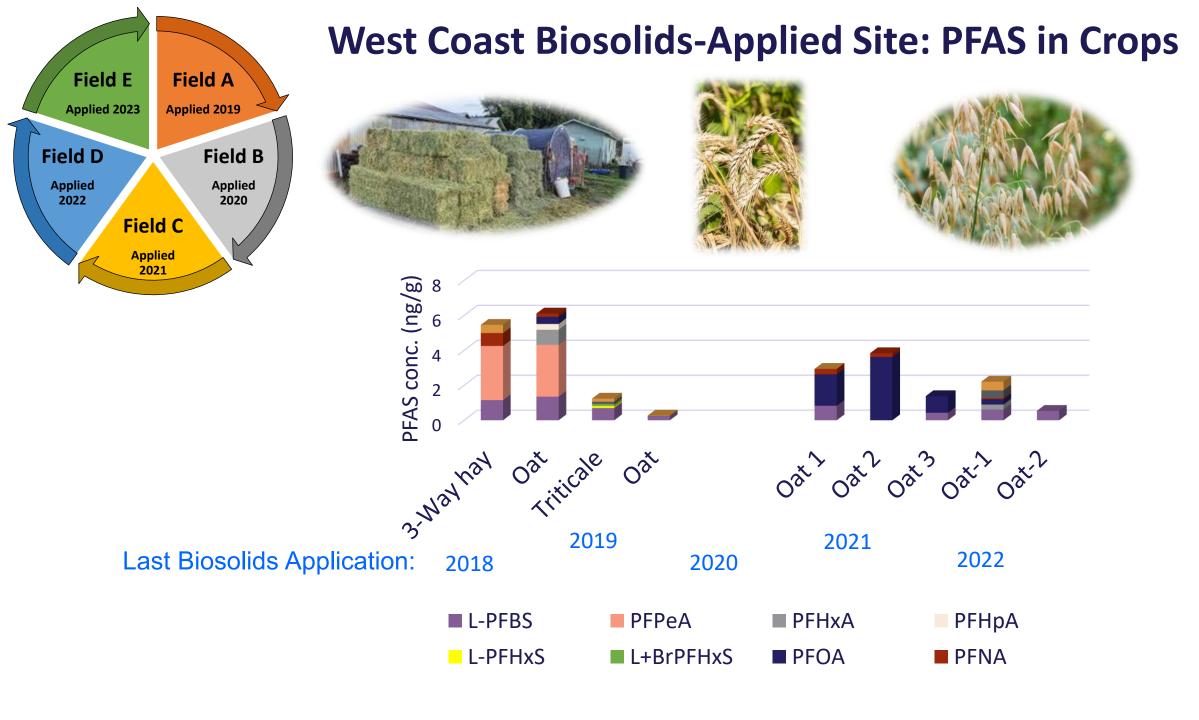




- PFAS (particularly long chain like PFOS) bioaccumulates in meat and milk
- Irrigation with PFAS-contaminated water
- PFAS-containing biosolids-based fertilizer
- PFAS in the feed
 - PFAS uptake is greatest into leaves and stalk
 - PFAS accumulate in grasses (hay)
 - PFAS uptake is small into fruit (e.g., tomatoes), seeds (e.g., soybeans, corn kernels and cob)
- Drinking PFAS-contaminated water
- Only Maine has guidance; currently
 - 3.4 ppb in meat
 - 211 ppt in milk
 - Expect 5x reduction in milk guidance







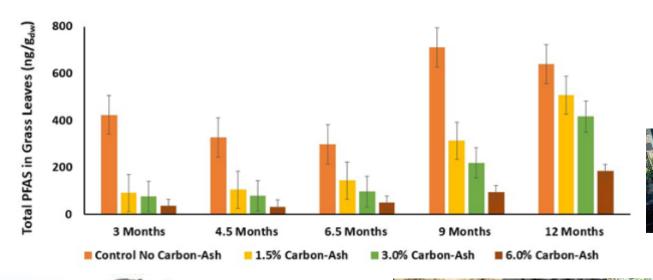
Grass Greenhouse Studies: Uptake and Mitigation

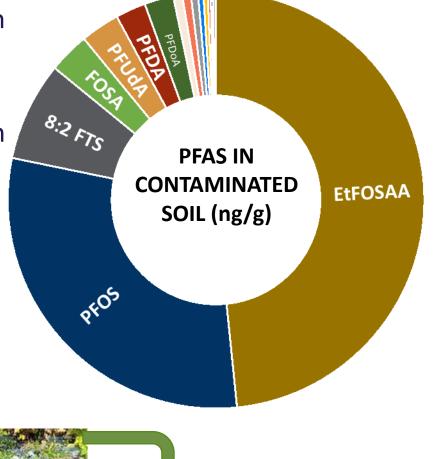
• Contaminated agricultural soil from Maine - ∑PFAS = 840 ng/g with most being PFOS and PFOS precursors (Me- & EtFOSAAs, FOSA)

• Biochar (wood chips ash) mixed at 3 rates (1.5%, 3% and 6%); n= 5

 Grass mix (40% Tall Fescue, 30% Orchard grass, 20% Festulolium and 10% Timothy) – typical feed grasses for cattle

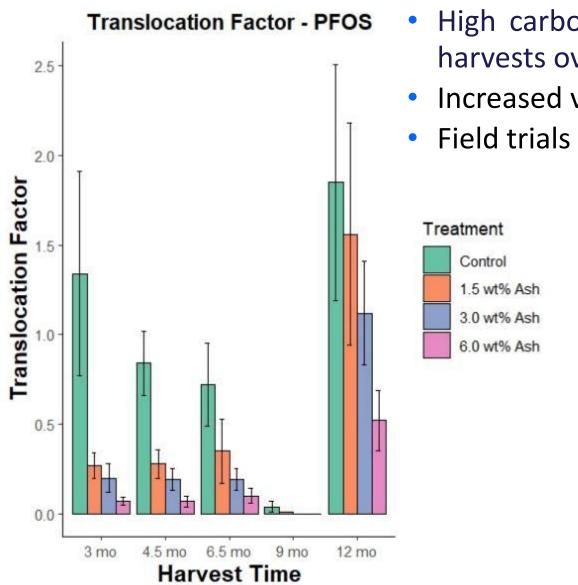
- Soil seeded in March 2024
- Pots watered as needed weekly
- 4 Grass leaves harvest: 3, 4.5, 6 and 7.5 months....







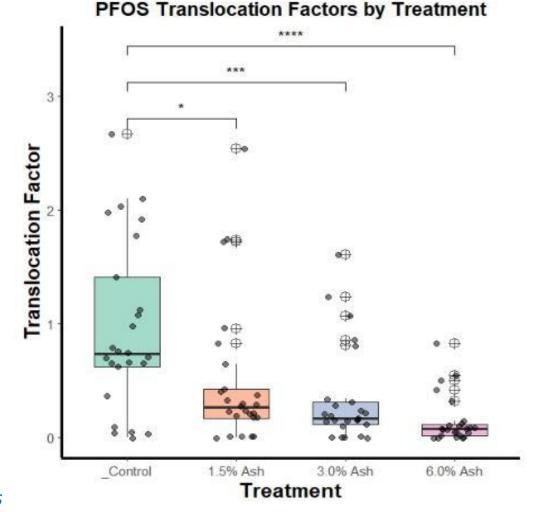
Grass Greenhouse Studies: Uptake and Mitigation



High carbon wood ash reduced uptake for all harvests over one year

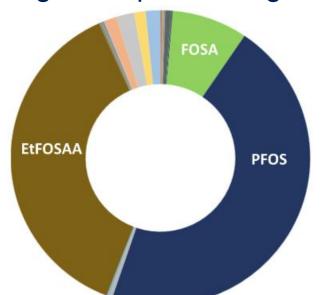
Increased variability with time

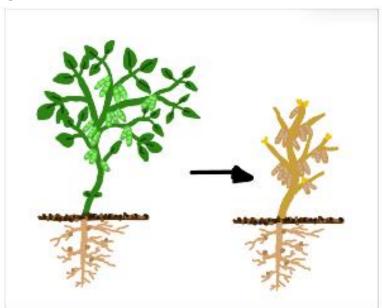
Field trials in process

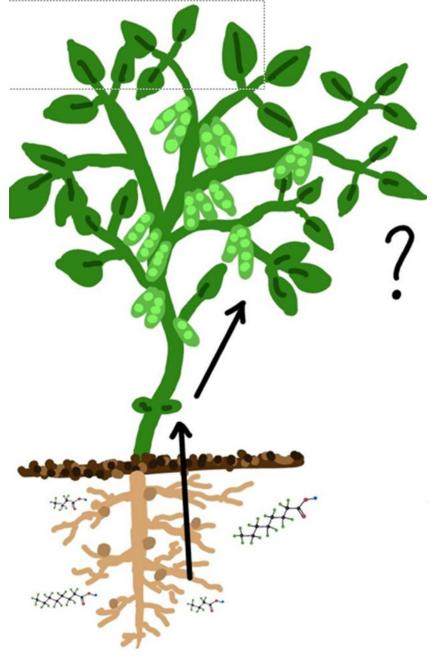


CROP UPTAKE HIGHLIGHTS: SOYBEANS

- Soils from years of paper mill biosolids-applied fields
- Soils had ∑PFAS ~2800 ppb, most are PFOS + ETFOSAA
- All pots were amended with Milorganite Biosolids at a rate of 1% for PFCA precursor addition
- 6 different soybean varieties grown through senescence
- No PFOS or ETFOSA in the bean
- Only primarily PFBA, PFPeA & PFHxA
- Higher % protein, higher uptake





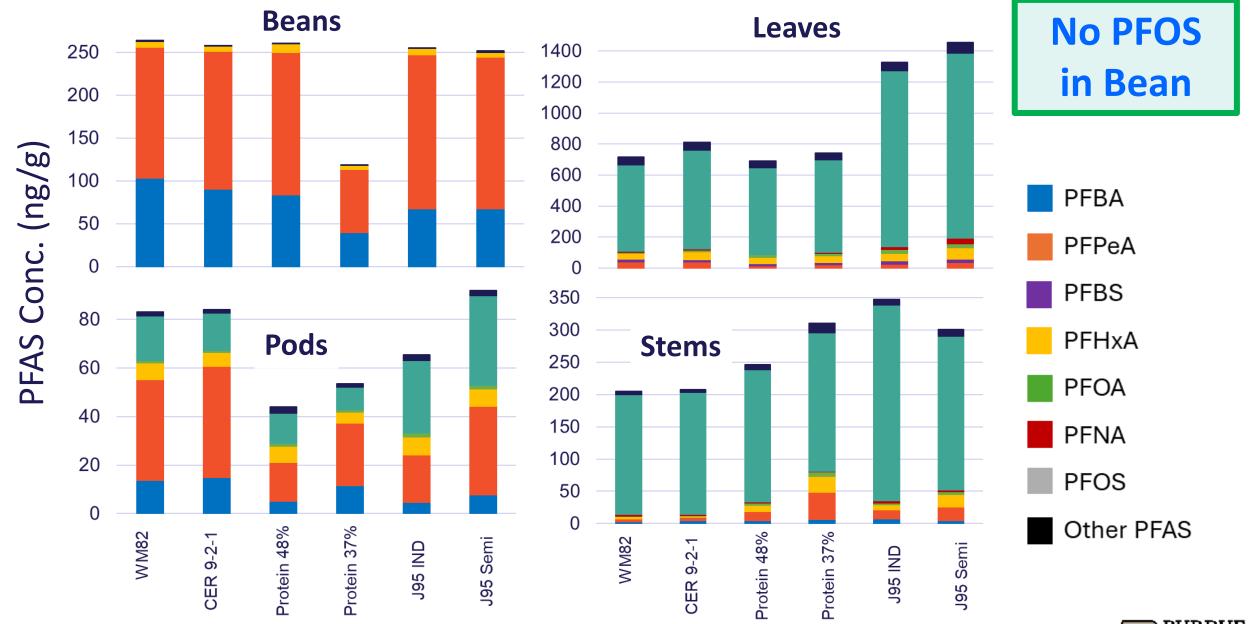








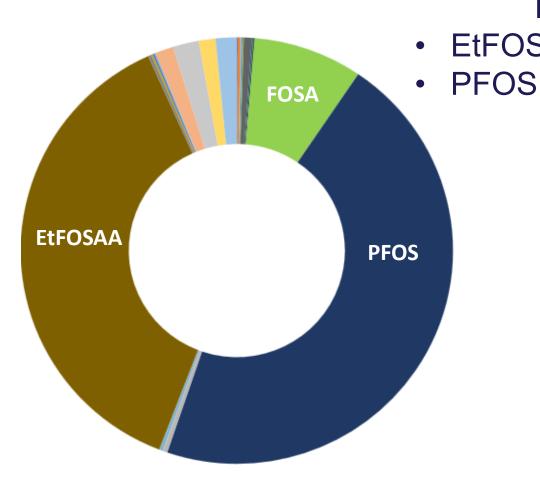
UPTAKE - SOYBEAN PLANTS: LEAVES > STEMS > PODS





PFAS-Contaminated Soil (Municipal versus Industrial Signature)

Dominated by:



Received only papermill biosolids

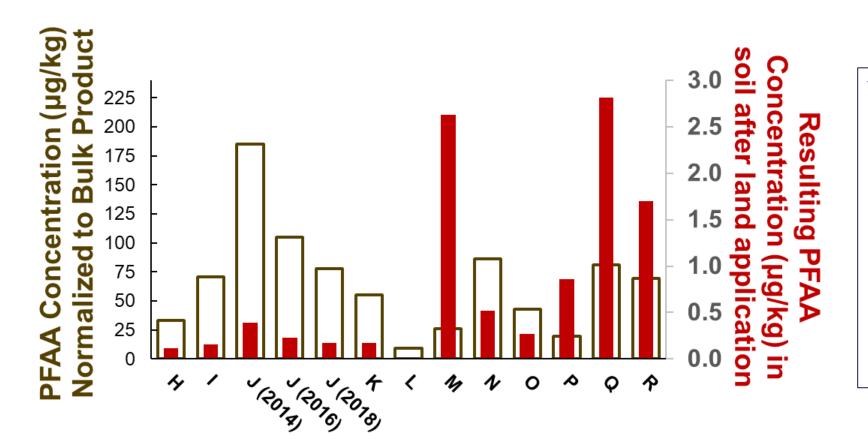
EtFOSAA (PFOS precursor) L+Br-N-**EtFOSAA**

> Received papermill and municipal biosolids also impacted by paper mill discharge into WWTPs





Putting PFAS in Biosolids in Perspective (Example)



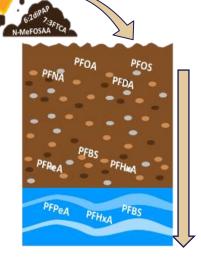
White bars: PFAAS in biosolids being applied at N recommendations

Red bars: PFAA concentrations in soil after mixing into the growing media where roots reside

- Soil amendments/fertilizers are often applied based on N requirements
- Products low in N could lead to higher PFAS loads with a single application

Synopsis and Insights

- Most non-PFAS unregulated COCs are not a short-term or longterm concern
- Our biggest PFAS issues are legacy (prior applications)
- PFAS precursors (many not measured) biotransform to measured PFAS after land application
- PFAS migration from soil to groundwater is dominated by shortchain PFAS
- Long-chain PFAS predominantly persist (with longevity) in the upper profile, thus subject to continual runoff – optimize application strategies and buffer zones, ALSO long chain are decreasing
- Fields under tile-drainage, direct transport to groundwater is minimized (not shown





Perspectives and Path Forward towards a Circular Economy

- Banning land application places a heavy burden on public municipalities and can lead to numerous unintended consequences
- Control sources contributing to PFAS levels in biosolids (e.g., pretreatment of influent from industry or landfills with high PFAA levels)
- Focus on regulating nonessential PFAS uses to reduce PFAS loads coming into our WRRFs Domestic sewage typically contributes the largest PFAS mass load coming into our treatment plants and most PFAS mass exits via effluent to surface waters not biosolids.
- > Continue research on fate, effects, application optimization, & treatment/mitigation strategies
- Innovate biosolids processing to reduce PFAS in biosolids
- Consider adaptable plans for PFAS-contaminated lands





THANK YOU! QUESTIONS?



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EPA Disclaimer: Data and views shared have not been formally reviewed by EPA and are solely the views of the researchers and not the agency.