U.S. EPA Biosolids Program Update

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HEALTH AND ECOLOGICAL CRITERIA DIVISION
OFFICE OF SCIENCE AND TECHNOLOGY | OFFICE OF WATER

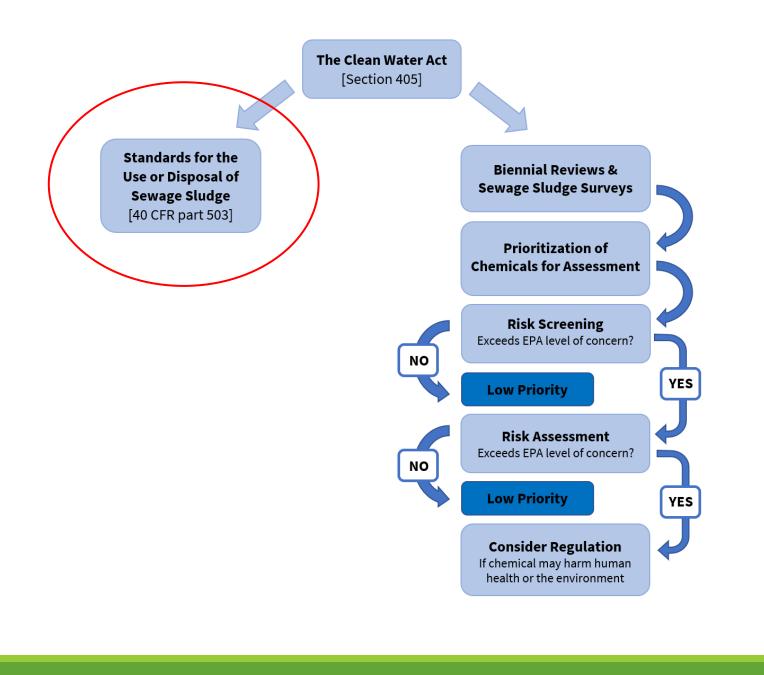
Chesapeake Bay Program Toxic Contaminant Workgroup

August 9, 2023

Disclaimer

The views expressed in this presentation are those of the author and do not necessarily represent the views or policies of the U.S. Environmental Protection Agency.

40 CFR Part 503 – Standards for the Use or Disposal of Sewage Sludge



Assessing Risk from Pollutants Found in Biosolids

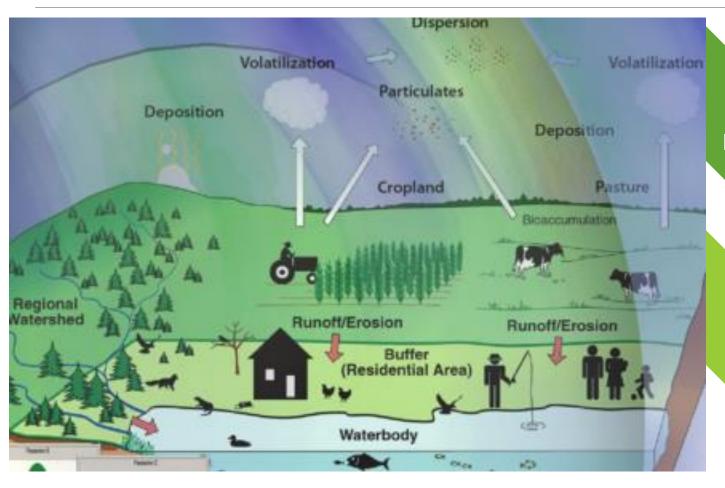
What is Risk Assessment?

Risk assessment is a scientific process. In general terms, risk depends on the following three factors:

- 1) How much of a stressor is present in an environmental medium (e.g., soil, water, air) over what geographic area,
- 2) How much contact (exposure) a person or ecological receptor has with the contaminated environmental medium, and
- 3) How it affects the health of humans or ecological receptors (i.e. toxicity).

Source: EPA Website: Risk Assessment

Biosolids – Conceptual Model



Human Health risk

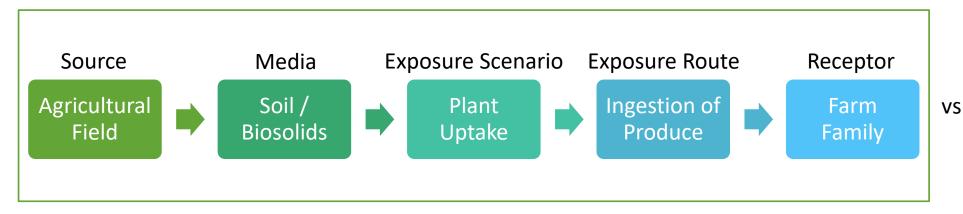
- Inhalation
- Drinking water
- Diet
- Soil ingestion

Ecological risk

- Water
- Soil
- Terrestrial

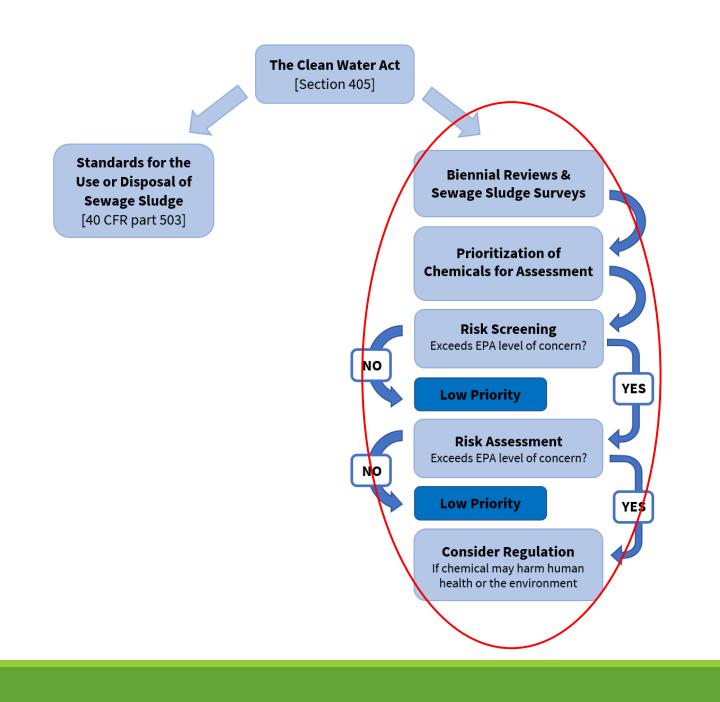
Example Exposure Pathway - Dietary

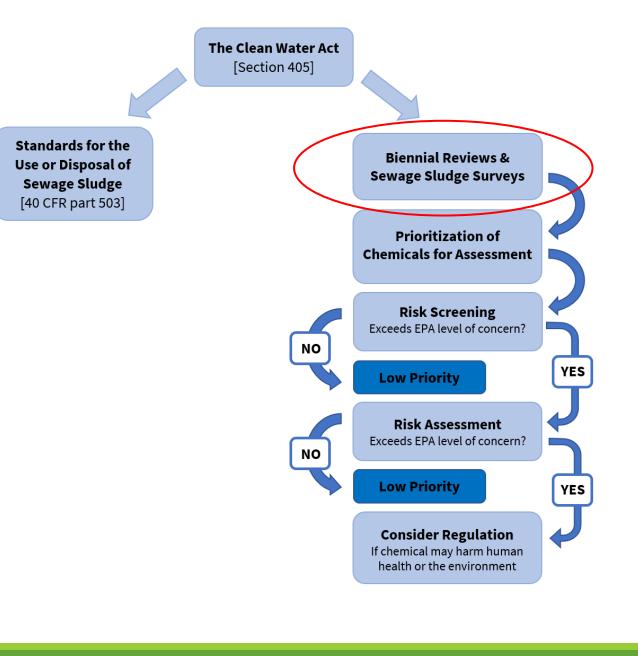
EXPOSURE



HAZARD

Dose
Reference
Dose
Cancer
Slope Factor





Biennial Reviews & Sewage Sludge Surveys

Biennial Reports
BR No.1 (2004-2005)
BR No.2 (2006-2007)
BR No.3 (2008-2009)
BR No.4 (2010-2011)
BR No.5 (2012-2013)
BR No.6 (2014-2015)
BR No.7 (2016-2017)
BR No.8 (2018-2019)
BR No.9 (2020-2021)

Sewage Sludge Surveys

1988 National Sewage Sludge Survey

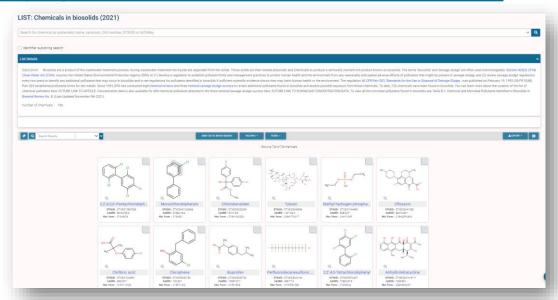
2001 National Sewage Sludge Survey

2006 Targeted National Sewage Sludge Survey

 Initiated planning for the next national sewage sludge survey

Biosolids List on EPA's CompTox Chemicals Dashboard

• Link: https://comptox.epa.gov/dashboard/chemical-lists/BIOSOLIDS



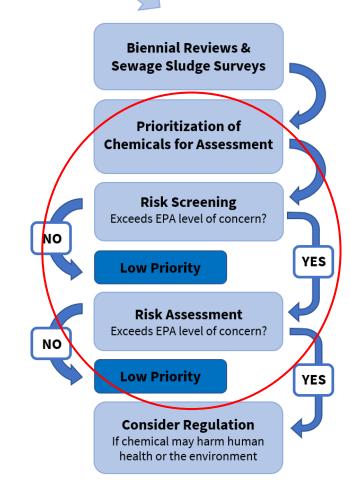
• Richman, T., Arnold, E. & Williams, A.J. Curation of a list of chemicals in biosolids from EPA National Sewage Sludge Surveys & Biennial Review Reports. *Sci Data* **9**, 180 (2022).

https://doi.org/10.1038/s41597-022-01267-9

Science Advisory Board

The Clean Water Act [Section 405]

Standards for the Use or Disposal of Sewage Sludge [40 CFR part 503]



Risk Assessment Framework

EPA is proposing a three-step approach to biosolids risk assessment:

- Step 1: Prioritization using the Public Information Curation and Synthesis (PICS) Approach
- Step 2: Screening-level Model
- Step 3: Framework for Refined Risk Assessment including Probabilistic Modeling

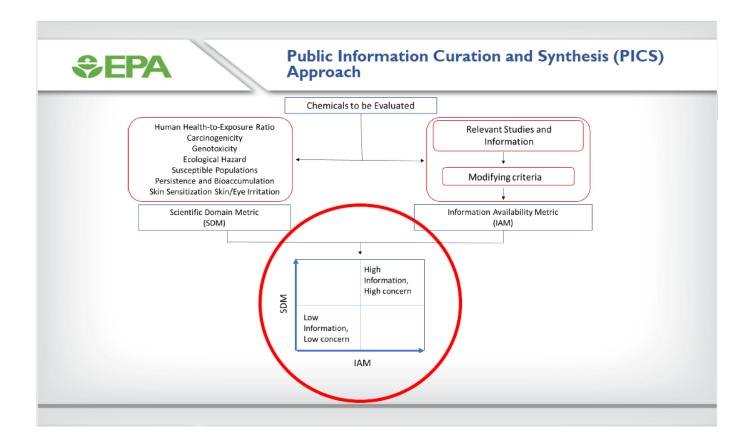
Science Advisory Board - "Approach to Biosolids Chemical Risk Assessment and Biosolids Screening Tool" (Began April 5, 2023)

• Link: https://sab.epa.gov/ords/sab/f?p=100:18:7435319323204:::RP,18:P18_ID:2610

Risk Assessment Framework: Prioritization

Link: <u>EPA National Biosolids Meeting</u> Summary 2021 (pdf)

Link: EPA National Biosolids Meeting 2021 (Session 3): EPA's Preliminary Biosolids Risk Assessment Approach — Biosolids Pollutant Prioritization

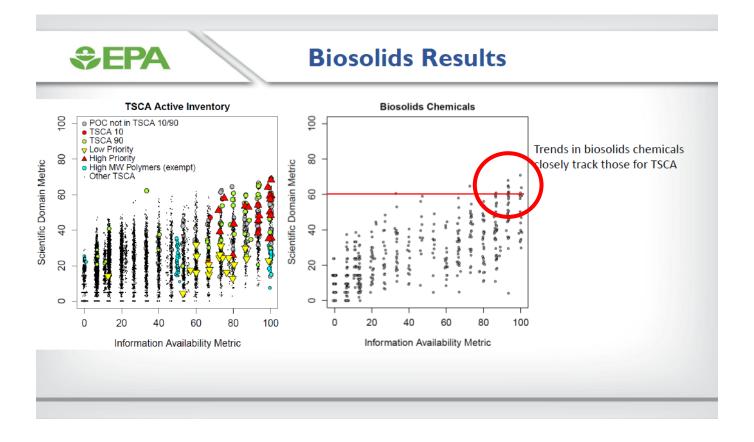


Source: <u>EPA National Biosolids Meeting 2021 (Session 3)</u>: <u>EPA's Preliminary Biosolids Risk Assessment Approach</u> – Biosolids Pollutant Prioritization, Dr. Richard Judson. November 2, 2022.

Risk Assessment Framework: Prioritization (cont.)

Link: <u>EPA National Biosolids Meeting</u> Summary 2021 (pdf)

Link: EPA National Biosolids Meeting 2021 (Session 3): EPA's Preliminary Biosolids Risk Assessment Approach — Biosolids Pollutant Prioritization

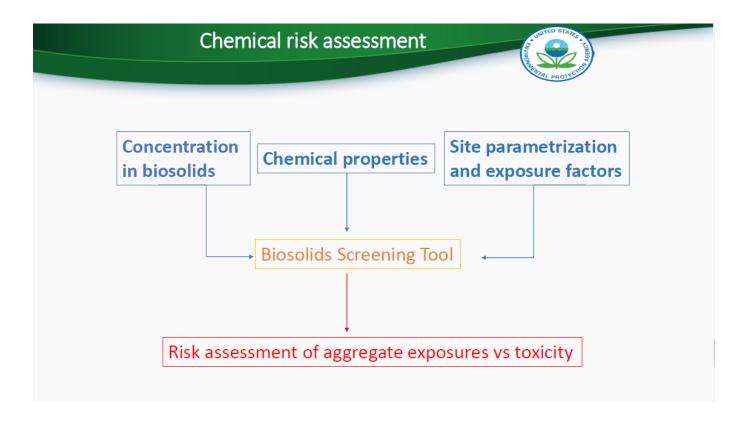


Source: <u>EPA National Biosolids Meeting 2021 (Session 3)</u>: <u>EPA's Preliminary Biosolids Risk Assessment Approach</u> – Biosolids Pollutant Prioritization, Dr. Richard Judson. November 2, 2022.

Risk Assessment Framework: Screening-level Model

Link: <u>EPA National Biosolids Meeting</u>
<u>Summary 2021 (pdf)</u>

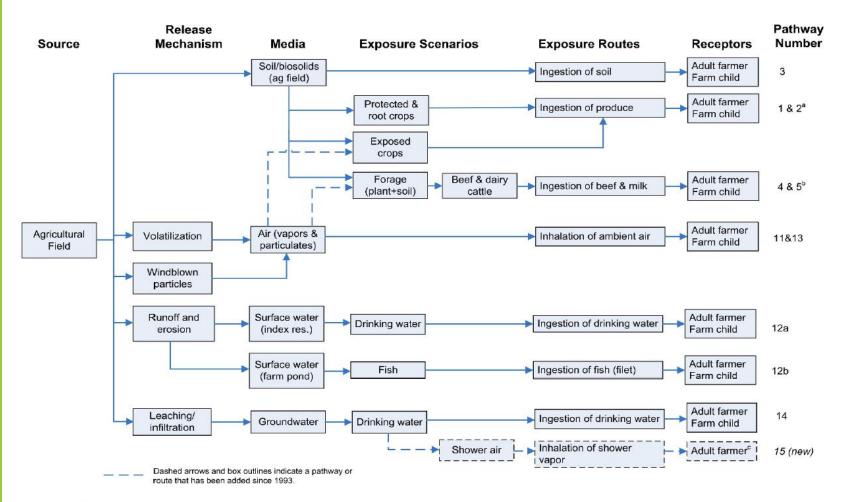
Link: EPA National Biosolids Meeting 2021 (Session 5): EPA's Preliminary Biosolids Risk Assessment



Source: EPA National Biosolids Meeting 2021 (Session 5): EPA's Preliminary Biosolids Risk Assessment, Dr. David Tobias. November 2, 2022.

Risk Assessment Framework: Framework for Screening and Refined Risk Assessment including Probabilistic Modeling

Link: <u>SAB - Approach to Biosolids</u> <u>Chemical Risk Assessment and</u> Biosolids Screening Tool



^a Originally, Pathways 1 and 2 differed only in that they were modeled for two different scenarios (1, general population and 2, home gardener). In the Biosolids Screening Tool, this pathway is modeled for only one scenario, a farm family (adult farmer and farm child).

Figure A-1. Conceptual model for human exposures.

Source: EPA National Biosolids Meeting 2021 (Session 5): EPA's Preliminary Biosolids Risk Assessment, Dr. David Tobias, November 2, 2022.

^b Originally, Pathways 4 (cattle eat contaminated plants) and 5 (cattle eat contaminated soil) were modeled separately. In the Biosolids Screening Tool, these pathways are combined to reflect that when cattle eat forage, they ingest soil as well. The overall cattle diet is assumed to be 95% forage and 5% soil.

^c The farm child is omitted because inhalation risks for children are always equal to or lower than those for adults, and young children are less likely to shower.

PFOA and PFOS Risk Assessment in Biosolids

PFOA and PFOS Risk Assessment

- EPA PFAS Strategic Roadmap: EPA's Commitments to Action 2021-2024 "Finalize risk assessment for PFOA and PFOS in biosolids that will serve as the basis for determining whether regulation of PFOA and PFOS in biosolids is appropriate."
 - Link: https://www.epa.gov/pfas/pfas-strategic-roadmap-epas-commitments-action-2021-2024

PFOA and PFOS Risk Assessment (cont.)

Generalized Risk Assessment Framework

Planning & Scoping

• Define the purpose, scope and technical approaches for the risk assessment.

Problem Formulation

- Helps answer these questions:
- Who/What/Where is (at) risk?
- What is the hazard of concern?
- How does exposure occur?

Analysis

- Evaluate the potential for risk of adverse effects in humans, plants and animals.
- This phase can include hazard identification, dose-response and exposure assessments.

Risk Characterization • Use the analysis to estimate the risk of health problems in the exposed population and identify uncertainties.

→ Link: <u>EPA Biosolids PFOA & PFOS Problem</u>
Formulation Meeting Summary

Ongoing

PFOA and PFOS Hazard Assessment

- Proposed PFAS National Primary Drinking Water Regulation (March, 2023)
- Link: https://www.epa.gov/sdwa/and-polyfluoroalkyl-substances-pfas

Ongoing Work for PFOA and PFOS RA

Source Media Exposure Scenario Exposure Route Receptor Agricultural Field Diosolids Produce Family

EXPOSURE

HAZARD

vs Dose

Reference
Dose

Cancer
Slope Factor

"WWTPs do not generate PFAS, they just receive them. What are we supposed to do?"

MICHIGAN STRATEGY FOR LAND APPLICATION OF BIOSOLIDS CONTAINING PFAS (UPDATED 2022)

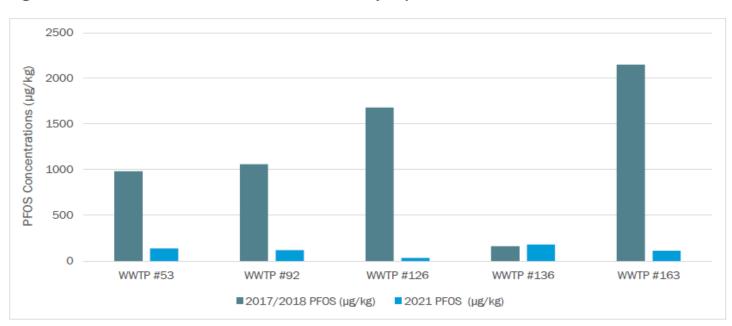


Figure 1. PFOS Concentration Reductions in Industrially Impacted Biosolids: 2017 to 2021

Source: Land Application of Biosolids Containing PFAS: Interim Strategy, Updated April 2022. Michigan Department of Environment, Great Lakes, and Energy.

"What happens after the PFOA/PFOS risk assessment is complete in 2024?"

Risk Management

Risk Management is a distinctly different process from risk assessment. Risk assessment establishes whether a risk is present and, if so, the range or magnitude of that risk. In the risk management process, the results of the risk assessment are integrated with other considerations, such as economic or legal concerns, to reach decisions regarding the need for and practicability of implementing various risk reduction activities. Risk managers also use risk assessment results as a basis for communicating risks to interested parties and the general public.

Source: EPA Website – Risk Management

"What should I do in the meanwhile?"

MEMORANDUM

SUBJECT: Addressing PFAS Discharges in NPDES Permits and Through the Pretreatment Program

and Monitoring Programs

C. Recommended Biosolids Assessment

- 1. Where appropriate, states may work with their POTWs to reduce the amount of PFAS chemicals in biosolids, in addition to the NPDES recommendations in Section B above, following these general steps:⁷
 - a. EPA recommends using draft method 1633 to analyze biosolids at POTWs for the presence of 40 PFAS chemicals.⁸
 - b. Where monitoring and IU inventory per section B.2 and B.3.a above indicate the presence of PFAS in biosolids from industrial sources, EPA recommends actions in B.3.b to reduce PFAS discharges from IUs.
 - c. EPA recommends validating PFAS reductions with regular monitoring of biosolids. States may also use their available authorities to conduct quarterly monitoring of the POTWs (see 40 CFR 403.10(f)(2)).

Source: Memorandum: Addressing PFAS Discharges in NPDES Permits and Through the Pretreatment Program and Monitoring Programs (December 5, 2022)

Biosolids Team

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Questions?