STATE OF MAINE
DEPARTMENT OF ENVIRONMENTAL PROTECTION

JANET T. MILLS
GOVERNOR

MELANIE LOYZIM
COMMISSIONER

To: Generators of Wastewater Treatment Plant Sludge and Solid Waste Facilities Accepting Wastewater Treatment Plant Sludge

From: Carla J. Hopkins, Director, Division of Materials Management CJH

Date: October 23, 2026

Re: Guidance on PFAS Sampling and Analysis Frequency (P.L. 2025, ch. 651, **An Act to Improve the Management of Landfill Leachate and Wastewater Treatment Plant Sludge at Solid Waste Landfills**)

On August 27, 2026, the Department sent out memoranda to all generators of wastewater treatment plant sludge as well as solid waste facilities accepting wastewater treatment plant sludge for processing or disposal. Since those memoranda went out, the Department has been asked to provide further guidance on implementing the requirements of P.L. 2025, ch. 651, *An Act to Improve the Management of Landfill Leachate and Wastewater Treatment Plant Sludge at Solid Waste Landfills* ("L.D. 2070"). In particular, operators of solid waste receiving facilities have asked at what frequency should generators be sampling and analyzing their sludge for PFAS. At a minimum and for the first two years, generators should test their sludge for PFAS in accordance with the following frequency and dates. Subsequent to this, all generators may test annually unless the Department or receiving facility requires more frequent testing based on an evaluation of data or other site-specific considerations.

Wet Tons of Sludge Produced Annually	Frequency of Sampling/Analysis Annually	Analysis Results - Reports Due on 15th of Month Listed
1,000 tons or less	1	January
More than 1,000 tons but less than 5,000 tons	2	January, July
5,000 tons or more	3	January, May, September

As receiving facilities are reviewing proposed Sampling and Analytical Work Plans ("SAWPs") from generators to include in their Waste Characterization Program, they should ensure that generators are proposing to sample and analyze their sludge at or above the minimum frequencies outlined above.

If you have any questions regarding this guidance, please contact me at Carla.J.Hopkins@maine.gov or 207-446-4366.