

Thank you for the opportunity to comment on this important and challenging topic. The Ocean County Utilities Authority (Authority) has a long-standing strong commitment to a beneficial reuse program whereby 100 % of its biosolids are land applied as a Class A fertilizer product. The Authority owns a heat-drying fertilizer manufacturing facility in Bayville, NJ and markets and distributes OCEANGRO® organic fertilizer to customers in New Jersey and surrounding states. This history of success is attributed to support from the Authority Board of Commissioners, the County of Ocean, and significant commitment and support from both USEPA and NJDEP.

The Authority supports a source-reduction approach to managing PFAS challenges within residuals as well as use of scientific risk assessments now underway at USEPA and within academia. Banning or otherwise imposing significant restrictions upon land application of Class A marketable residual products would have significant and detrimental impact upon the Authority and the Authority's ratepayers.

The Authority looks forward to the ability to collaborate with NJDEP, Clean Water Council, USEPA, and stakeholders to evaluate and determine the most sensible and acceptable management approaches moving forward.