

Key

*of radial charting of PFAS sample results
Chart generated by Trihydro Corporation*

SOLANO COUNTY

2026 ANNUAL BIOSOLIDS LAND APPLICATION REPORT Reporting for the 2025 Biosolids Land Application Season

Prepared by:

Trey Strickland, Environmental Health Manager
 Jeffrey Bell, Environmental Health Supervisor
 Anthony Endow, Senior Environmental Health Specialist
 Ashley Feigel, Environmental Health Specialist

Presented to the Board of Supervisors: _____

2026 Annual Biosolids Land Application Report

Reporting for the 2025 Biosolids Land Application Season

Executive Summary

- Section I A Brief Overview of Solano County’s Biosolids Program and current status of the program
- Section II Registered Biosolids Land Application Sites in Solano County
Biosolids registered fields owned by Flannery Associates, 2025
- Section III Overview and update on County Biosolids Research Project
- Section IV Oversight of New Biosolids Treatment Technologies
- Section V Stakeholders Group Meetings Summary
- Section VI Summary of Bay Area Clean Water Agency Report

Attachments

- A. Bay Area Clean Water Agencies Memo
- B. Final report: Trihydro Corporation “Study of the Fate of Per- and Polyfluoroalkyl Substances (PFAS) in Biosolids After Land Application”

2026 Annual Biosolids Land Application Report

Reporting for the 2025 Biosolids Land Application Season

EXECUTIVE SUMMARY

Scope of report

The Solano County Department of Resource Management provides this annual summary report for the 2025 biosolids land application season as required by Chapter 25 of the Solano County Code. Attachment A includes the 2025 Bay Area Clean Water Agency (BACWA) report summarizing trends in the biosolids industry.

As previously projected in the December 2025 Biosolids report to the Board of Supervisors, no permits were issued for the 2025 biosolids land application season. No permits for the land application of biosolids have been issued by the County since the 2023 season. The previous permittee and operator, Synagro West LLC, determined at that time that biosolids land application operations were no longer economically feasible due to the acquisition of registered fields by Flannery Associates, who declined to allow continued Class B biosolids land application onto properties they own.

As has been widely reported, California Forever, and their subsidiary company Flannery Associates LLC, are seeking to create a new community within the vicinity of the CA State Highway 12 and the CA State Highway 113 intersection. To this end, Flannery Associates, LLC has purchased over 55,000 acres of land within Solano County, including many of the registered fields that previously received biosolids land applications. While not all registered fields have been acquired by Flannery Associates, LLC, the applicator has stated that the fields that remain within each ranch do not provide enough acreage to make mobilization and land application economically worthwhile.

Environmental Health does not anticipate receiving applications to land apply biosolids until the potential new boundaries of California Forever's proposed community have been established.

This report will provide a summary of the County biosolids research project as well as County efforts to determine an appropriate level of oversight over novel biosolids treatment processes.

Recommendations:

The Department of Resource Management recommends the Board of Supervisors accept the 2026 Annual Biosolids Land Application Report.

Solano County Biosolids Research Project:

In 2023, the County initiated a biosolids research project to study the fate of per- and polyfluoroalkyl substances (PFAS) in fields where biosolids had previously been land applied. Following issuance of a Request for Proposals, Trihydro Corporation was selected as the research partner and project scoping meetings were conducted in 2023. The purpose of the study was to evaluate whether residual PFAS compounds were present in soils previously receiving biosolids applications, determine whether certain PFAS compounds occurred more frequently than others and identify any observable trends among detected PFAS species.

Five sampling events were conducted during 2024 and 2025, resulting in the collection and analysis of 73 soil and porewater samples. The County's biosolids research project, titled "*Study of the Fate of Per- and Polyfluoroalkyl Substances (PFAS) in Biosolids After Land Application*," concluded in October 2025, and the final report prepared by Trihydro Corporation was received in November 2025.

Results of the study indicated that PFAS compounds were detected at elevated levels in lands previously receiving biosolids applications. The research team analyzed the types, distribution and concentrations of PFAS compounds identified during the study. Additional information regarding PFAS compounds and the County's biosolids research project is provided in Section III.

Oversight of New Biosolids Treatment Technologies

County staff are exploring methods to apply or update Solano County Code Ch. 25 in an effort to bring new biosolids treatment and land application technologies under County oversight. More information on this is provided in Section IV.

Biosolids Stakeholder Group Meetings:

The Biosolids Stakeholder Group met on February 26, 2026. The meeting was conducted in a hybrid format, with the in-person meeting also broadcast virtually through the Microsoft Teams application. The meeting focused on a presentation by the County's research partner, Trihydro Corporation, regarding the final report titled "*Study of the Fate of Per- and Polyfluoroalkyl Substances (PFAS) in Biosolids After Land Application.*" The meeting also included a public comment and response period open to all attendees. A summary of the meeting discussion and comments is provided in Section V.

Bay Area Clean Water Agencies Report:

Generators that provide biosolids for land application in Solano County are required to submit an annual summary of materials supplied, along with updates regarding each agency's efforts to develop alternative energy sources and alternative uses for biosolids. The Bay Area Clean Water Agencies (BACWA) 2025 memorandum is summarized in Section VI and included as Attachment A.

Solano County was also notified that, effective July 2025, the Bay Area Biosolids Coalition (BABC) was incorporated into BACWA, which has assumed the role and responsibilities previously carried out by the BACWA Biosolids Committee.

Section I: A Brief Overview of Solano County’s Biosolids Program and current status of the program

What are biosolids

Biosolids are the solid fraction of sewage sludge that undergoes treatment to reduce pathogens and reduce vector attraction factors. Publicly Owned Treatment Works (POTW) facilities utilize different methods to achieve the pathogen reduction and vector attraction reduction standards that are required to allow the sewage sludge to be classified as biosolids and subsequently beneficially reused as a soil amendment.

Biosolids are regulated by federal, state, and county agencies, each providing requirements and oversight for the generation, sampling, management, and land application of biosolids.

Biosolids are typically between 15-25% solids by weight, with the remaining weight being comprised of water. The tracking and reporting of land applied biosolids, nitrogen content, and pollutants is performed on a “dry weight” basis with the water weight calculated out.

What regulations govern the land application of biosolids in Solano County

In 1993, the US EPA promulgated “Standards for the Use or Disposal of Sewage Sludge” (Code of Federal Regulations Title 40, Part 503 – “Part 503”) which regulates biosolids generation and establishes ceiling and lifetime pollutant accumulation concentrations in soils receiving biosolids, as well as pathogen and vector attraction reduction standards for the biosolids material. Part 503 also specifies the sampling frequency, methodology, and provides methods for calculating plant available nitrogen application (PAN), lifetime pollutant loading, and reporting requirements.

Solano County began overseeing the land application of biosolids in 1995 and currently regulates the land application of biosolids through Solano County Code Chapter 25.¹ Chapter 25 builds upon both federal and State requirements through a County-specific inspection and oversight program. The need to implement the program was established with concerns over application rates of the biosolids material in conjunction with rain events and the potential for stormwater runoff pollution to waters of the State. Chapter 25 restricts when and where biosolids may be applied to minimize offsite impacts by allowing applications only during the dry season (April 15 through October 15) and prohibits the land application of biosolids during wet weather and during high wind conditions. The County’s program also encourages public participation through public notifications and stakeholder meetings and establishes a funding mechanism to support research regarding the composition and effects of land-applied biosolids.

In July 2004, the California State Water Resources Control Board (SWRCB) began regulating biosolids land application under Water Quality General Order No. 2004-0012-DWQ². The General Order establishes restrictions for land application in sensitive habitats, including the Suisun Marsh; specifies periods between biosolids application and crop harvesting or livestock grazing activities; establishes minimum setback distances between staging or application areas and sensitive receptors, including water bodies, water wells and public roads; and created a field registration process for biosolids application sites.

While County oversight of biosolids land application began in 1995, Solano County Code Ch. 25

¹ Solano County Code Chapter 25, Article IV: *Domestic Septage Land Application and Biosolids Land Application*.

² State Water Resources Control Board (SWRCB) Water Quality Order No. 2004–0012–DWQ: *General Waste Discharge Requirements For The Discharge Of Biosolids To Land For Use As A Soil Amendment In Agricultural, Silvicultural, Horticultural, And Land Reclamation Activities*

has undergone several revisions and amendments in response to community concerns, resident input and evolving federal and State regulatory requirements. The ordinance was last comprehensively amended in 2012 and currently incorporates the restrictions and operational requirements contained in the SWRCB's General Order regulating biosolids land application.

What is the current status of the County biosolids oversight program

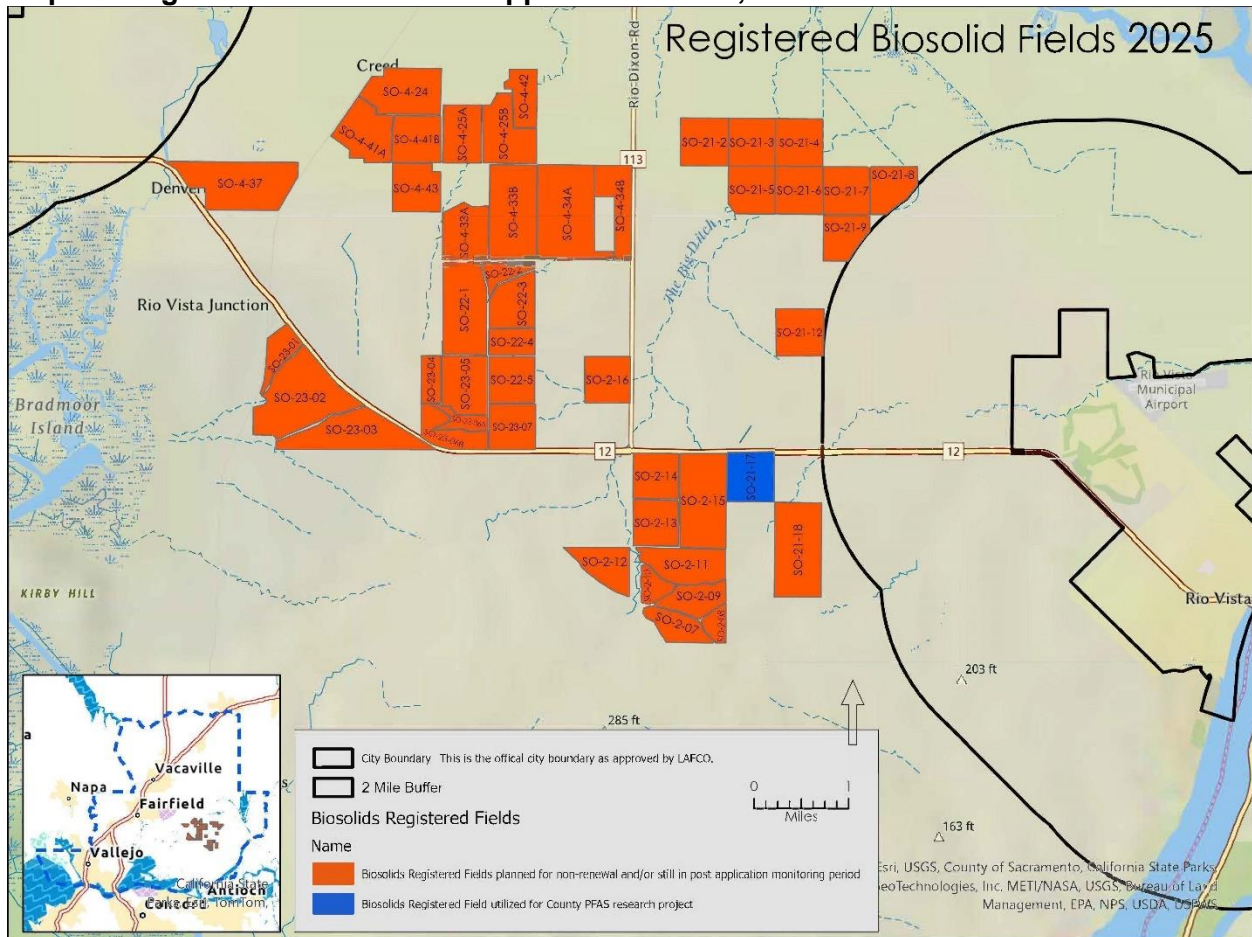
The County has not issued a permit for the land application of biosolids since the 2023 application season. As previously reported to the Board, this change is primarily due to Flannery Associates and California Forever declining to allow additional Class B biosolids applications on properties under their ownership or control.

While not all registered fields have been acquired by Flannery Associates LLC (California Forever), the historic permittee and land applicator, Synagro West, has indicated that the remaining available acreage within the registered fields is insufficient to support economically viable land application operations. As a result, Synagro has shifted its biosolids land application activities to other counties within California.

The County continues to evaluate the appropriate level of oversight for biosolids-derived fertilizer products, including the LysteGro product currently applied within Solano County by Lystek International. The current version of Solano County Code Chapter 25 did not contemplate field-injectable liquid fertilizer products derived from biosolids, such as LysteGro. While the County is working toward establishing increased oversight and operational standards for these products, staff is also seeking to balance regulatory oversight with the continued availability of economical alternative fertilizer products for local agricultural operations.

Section II – Registered Biosolids Land Application Sites in Solano County

Map 1 – Registered Biosolid Land Application Fields, 2025



Ranch Name and ID	Corresponding Registered Fields	Total Net Acreage
Hamilton Farms (SO-2)	SO-2-7, -8, -9, -10, -11, -12, -13, -14, -15, -16	1,213
Emigh Ltd Ranch (SO-4)	SO-4-24, -25A+B, -33A+B, -34A+B, -37, -41A+B, -42, -43	1,951.19
McCormack Ranch (SO-21)	SO-21-2, -3, -4, -5, -6, -7, -8, -9, -12, -17, -18	1,439
Emigh Souza Ranch (SO-22)	SO-22-1, -2, -3, -4, -5	685
Mayhood Ranch (SO-23)	SO-23-1, -2, -3, -4, -5, -6A+B, -7	949.6
Total Net Acres Registered for Biosolids Applications		6,237.79

The above map illustrates the 6,237.79 net acres of biosolids registered fields in Solano County that were previously registered with the SWRCB. As shown on the map, all registered fields depicted in orange are currently undergoing the SWRCB registration termination process. Pursuant to State requirements, termination of a field registration may only occur after completion of the required 38-month post-application monitoring period following the last biosolids application.

The registered field designated as SO-21-17, depicted in blue on the map, is the field utilized for the County’s Research and Education project evaluating the fate of PFAS compounds in biosolids following land application. Additional information regarding the research project is provided in

Section III.

Section III – Summary of Biosolids Research Project:

Background on the Solano County Biosolids Education and Research Trust Fund

In 2004, the Board of Supervisors established a Biosolids Scientific Research and Education Fee of \$15 per applied acre, charged to all biosolids land application permit holders. Revenue generated through the fee supports the Biosolids Education and Research Trust Fund (Research Trust Fund), which provides funding for scientific research regarding the potential effects of biosolids land application within Solano County.

On July 13, 2023, the County issued a Request for Proposals (RFP) through the OpenGov Procurement website seeking qualified research teams to study the fate and transport of per- and polyfluoroalkyl substances (PFAS) potentially present in biosolids.

Four proposals submitted by qualified research teams were evaluated during July and August 2023, with the selected research team identified in October 2023. On October 24, 2023, the Board of Supervisors approved a professional services agreement with Trihydro Corporation through the Consent Calendar to conduct the research study.

What are Per- and Polyfluoroalkyl Substances (PFAS)

First synthesized during the late 1930s and 1940s, per- and polyfluoroalkyl substances (PFAS) are a class of manmade chemicals characterized by the presence of a strong carbon-fluorine chemical bond. This bond gives PFAS compounds resistance to heat, oil and water. One of the earliest and most widely recognized PFAS compounds is polytetrafluoroethylene (PTFE), commonly known as Teflon, which has historically been used in non-stick cookware and food preparation equipment. Depending on the definition used, there are estimated to be between 15,000 and several million PFAS compounds, although only several dozen are routinely monitored or studied.

PFAS compounds have been used in a broad range of industrial and commercial applications, including food packaging, non-stick cookware, paints, varnishes and sealants, firefighting foams, electronics manufacturing, waterproof textile coatings, cosmetics and personal care products and medical equipment. The same carbon-fluorine bond that provides these compounds with their desirable performance characteristics also makes them highly persistent and resistant to degradation in the environment. PFAS compounds are now considered ubiquitous and have been detected globally in environmental media and biological tissues, including those of wildlife such as blue whales and polar bears.

As scientific research regarding the long-term health effects of PFAS compounds has expanded, PFAS substances have increasingly been recognized as endocrine-disrupting compounds capable of affecting hormonal regulation and endocrine gland function. Elevated exposure to certain PFAS compounds has been associated with thyroid disruption, reduced fertility, adverse pregnancy outcomes, developmental impacts and increased risks of obesity and diabetes.

Although concerns regarding PFAS compounds began emerging during the 1980s and 1990s, regulatory and scientific attention intensified during the early 2000s as improved analytical methods allowed PFAS compounds to be detected at increasingly lower concentrations. There is broad scientific consensus that certain PFAS compounds may impact human health at parts-per-trillion (ppt) concentrations; however, laboratory methods capable of reliably detecting compounds at these levels were only developed relatively recently. Of particular significance is United States Environmental Protection Agency (US EPA) Method 1633A, introduced in 2021 and finalized following public comment in March 2025.

US EPA Method 1633A was developed to standardize testing for 40 PFAS compounds in aqueous,

solid and biological media, including groundwater, soil, biosolids and fish or shellfish tissues. Previous US EPA testing methods, including Method 537 and later Method 537.1, were initially developed around 2013 for testing drinking water samples and covered 14 PFAS compounds, later expanded to 18 compounds under Method 537.1. Method 1633A represents the first EPA-approved analytical method specifically designed for testing PFAS compounds in media other than water.

What Efforts are Being Made to Address PFAS Accumulation

Initial federal efforts to address PFAS contamination began in 2016 when the United States Environmental Protection Agency (US EPA) established a Health Advisory (HA) threshold for two PFAS compounds in drinking water. Health Advisories are not legally enforceable standards, but instead provide guidance regarding concentrations at which additional screening, risk assessment and/or investigation may be warranted.

In 2024, the US EPA adopted the PFAS National Primary Drinking Water Regulation (NPDWR), establishing legally enforceable Maximum Contaminant Levels (MCLs) for six of the most widely studied PFAS compounds. Under the final rule, public water systems are required to conduct PFAS monitoring between 2024 and 2027, with treatment and compliance measures anticipated to be implemented by 2029. However, legal actions initiated at the federal level in September 2025 indicate that portions of the rule may be revised, delayed or otherwise modified prior to the current implementation deadlines.

At the State level, California has taken several actions through the SWRCB, including the establishment of Notification Levels (NLs) and Response Levels (RLs) for PFAS compounds in drinking water in 2018 and 2020, as well as Environmental Screening Levels (ESLs) for site cleanup activities in 2020. In 2024, the California Office of Environmental Health Hazard Assessment (OEHHA) adopted Public Health Goals (PHGs) for certain PFAS compounds. While PHGs are not independently enforceable, they represent an important preliminary step toward the establishment of enforceable California Maximum Contaminant Levels (MCLs) for PFAS compounds in drinking water.

Most recently, in July 2025, the San Francisco Bay Regional Water Quality Control Board (SF-RWQCB) updated its Environmental Screening Levels for site cleanup activities, expanding the number of PFAS compounds evaluated from two to sixteen while also lowering applicable screening thresholds. Similar to Health Advisories and Public Health Goals, ESLs are not legally enforceable standards, but serve as screening tools to determine when additional evaluation, investigation or risk assessment may be appropriate.

Various technologies and treatment methods aimed at PFAS isolation, removal and destruction are currently under development, including foam fractionation, fungal and biological phytoremediation or sequestration methods and high-heat or plasma arc destruction technologies. However, many of these approaches remain in laboratory development or pilot-scale testing phases and are not yet broadly scalable for widespread implementation.

Many jurisdictions have also recognized that long-term reduction of PFAS contamination will likely depend heavily on source reduction strategies, including restrictions on the manufacture, use and disposal of products containing PFAS compounds.

Solano County Research Project:

“Study of the Fate of Per- and Polyfluoroalkyl Substances (PFAS) in Biosolids After Land Application”

The County's biosolids research project, titled "*Study of the Fate of Per- and Polyfluoroalkyl Substances (PFAS) in Biosolids After Land Application*," concluded in October 2025, and the final report prepared by the County's research partner, Trihydro Corporation, was received in November 2025.

One previously registered biosolids application field was selected as the primary study area. County records indicated that biosolids land application activities at the site began in 2005 and continued periodically through 2023. Solano County Code Chapter 25 requires a minimum 500-foot setback from water wells for biosolids land application activities. An area within the 500-foot setback distance from the existing onsite water well, where biosolids application had not occurred, was identified and utilized as a control sampling area for comparison purposes.

Five sampling events were conducted during 2024 and 2025, resulting in the collection and analysis of 73 soil and porewater samples. Samples were analyzed using both a laboratory-specific "537-M" analytical method, which modified US EPA Method 537 to evaluate PFAS compounds in soil samples, and US EPA Method 1633, which is currently considered the primary analytical standard for PFAS testing across multiple environmental media. Because EPA Method 1633 had not yet been finalized at the time the study commenced, and due in part to project budget considerations, portions of the analysis were conducted using the modified 537-M methodology.

Not all PFAS compounds are readily detectable using existing analytical methods, and it is widely recognized that precursor PFAS compounds may persist for months or years before degrading into compounds detectable through current laboratory testing methods. To help address this limitation, six Total Oxidizable Precursor (TOP) Assay samples were also analyzed using the modified 537-M method. The TOP Assay process subjects samples to an oxidation step intended to simulate long-term environmental weathering, thereby converting precursor compounds into terminal PFAS compounds that are more readily detected by laboratory analysis. This process is intended to provide additional insight into the potential long-term presence and transformation of PFAS compounds within the sampled soils and porewater.

Report Conclusions and Discussion

The data collected throughout the County research project largely aligned with larger sampling efforts conducted by other agencies that are similarly studying PFAS. The study timeframe was limited and not intended as a comprehensive human health risk assessment. Some of the conclusions of the study are presented here – readers are encouraged to look at the full report for a more complete understanding of these conclusions:

PFAS are present at elevated concentrations in biosolids-applied soils

PFAS compounds were detected throughout the biosolids-applied areas, including within the designated well setback control area. Shallow soil samples collected from depths of 0 to 12 inches below ground surface generally exhibited slightly higher PFAS concentrations than deeper samples collected from depths of 12 to 24 inches below ground surface.

PFAS concentrations were not changing over the sampling period

Only minimal changes in PFAS concentrations were observed during the relatively short study period between April 2024 and May 2025. These findings suggest that PFAS transport and transformation processes may occur over substantially longer timeframes than those evaluated during the project.

Results from the Total Oxidizable Precursor (TOP) Assay analyses also suggested that a significant portion of precursor PFAS compounds may transform into more stable terminal PFAS compounds within approximately ten months following land application. Based on the study findings, this transformation may have occurred between the last biosolids

application event in June 2023 and the initial sampling event conducted in April 2024. These findings may indicate that precursor PFAS compounds are more likely to be detectable at sites with more recent biosolids application activity.

Porewater sampling results were inconclusive

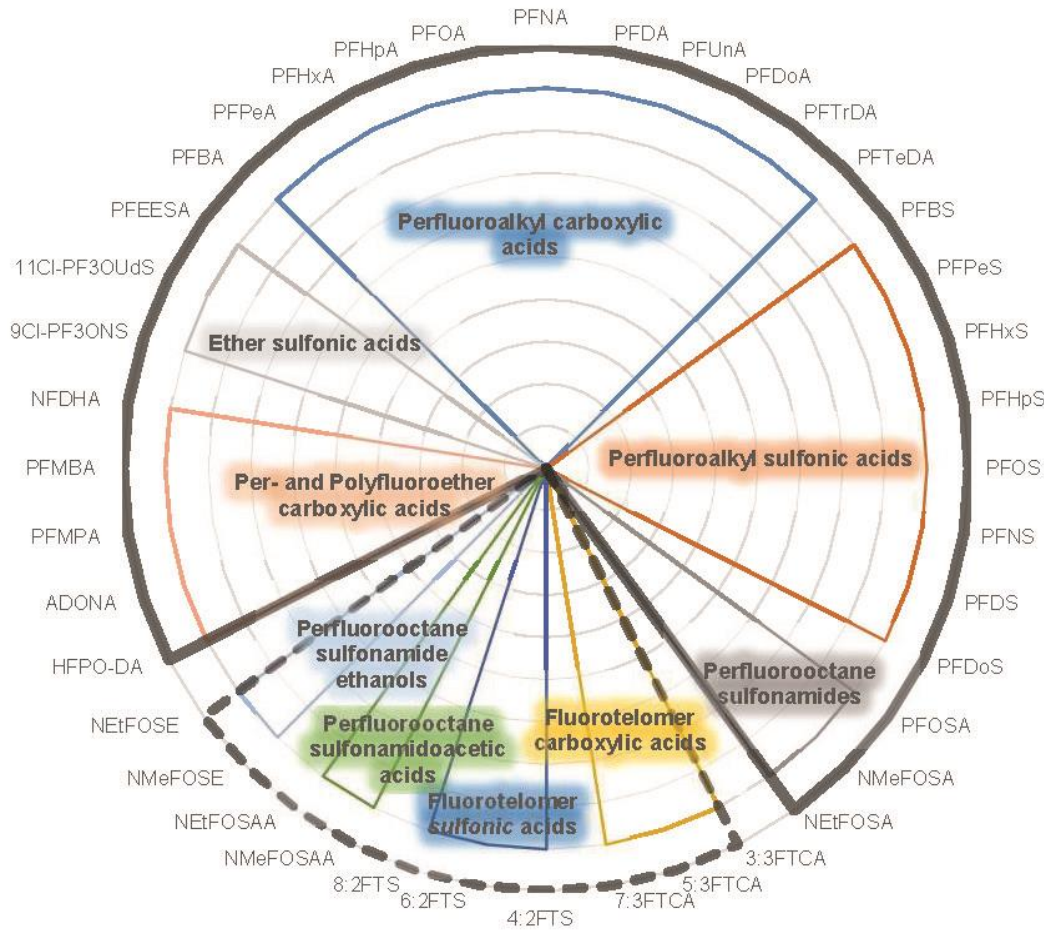
Lysimeter porewater sampling consists of setting up the lysimeter to collect under vacuum and is used to collect repeated samples over time at the same location, potentially allowing for measurements of PFAS compounds that leach from soil to groundwater and identification of PFAS mobility. Unfortunately, the lysimeter porewater sampling results were inconsistent and not used to draw conclusions about PFAS transport and mobility during the project timeframe. Hot and dry weather conditions during the sampling timeline and inadvertent damage to one of the lysimeters contributed to the data inconsistency.

Concentrations of some PFAS compounds exceed available concentration screening levels

In July 2025, the San Francisco Bay Regional Water Quality Control Board (SF-RWQCB) updated its Tier 1 Environmental Screening Levels (ESLs) framework to include 16 PFAS compounds. Tier 1 ESLs are not regulatory standards or enforcement thresholds, but instead function as an initial screening tool within broader risk assessment processes. The Tier 1 ESL framework assumes residential land use conditions, including the use of groundwater as drinking water and substantial vegetation coverage on-site. ESL exceedances are screening thresholds and not regulatory violations.

Three PFAS compounds — perfluorooctanoic acid (PFOA), perfluorodecanoic acid (PFDA) and perfluorooctane sulfonate (PFOS) — were detected at concentrations exceeding updated Tier 1 ESLs in portions of the project area, although not all samples or analytical methods resulted in exceedances. PFOS was detected in all but one sample and exceeded the applicable Tier 1 ESL in more than half of the analyzed samples.

The report also includes a comparison of analytical results generated using US EPA Method 1633 and the laboratory-specific Method 537-M. The findings indicate that PFAS concentrations identified using the two analytical methods were generally reasonably comparable.



PFAS
"fingerprint" chart:

Each spoke represents one of the 40 PFAS compounds reported by US EPA Method 1633A.

The chart is grouped by chemical/PFAS family.

Compounds within the dotted area are precursor compounds, those within the solid lines are terminal compounds.

Higher concentrations are denoted by a greater distance from the center of the chart.

Please see Figures 5-1 and 5-2: Recurring Soil Sample PFAS Signatures – Study Of The Fate Of PFAS In Biosolids After Land Application for "fingerprint" charting of the obtained sample results.

Section IV – Oversight of New Biosolids Treatment Technologies

New Biosolids Treatment Technologies

The potential scope and level of County oversight for the land application of liquid injectable Class A biosolids-derived fertilizer products, including the LysteGro product distributed by Lystek International, continues to be evaluated by County staff.

Lystek International began operations at its Organic Material Recovery Center located at the Fairfield-Suisun Sewer District facility on Chadbourne Road in 2016. The company utilizes a patented thermal hydrolysis process to convert biosolids feedstock into a Class A biosolids-derived injectable fertilizer product marketed as "LysteGro."

When initially introduced, the product was generally considered a fertilizer product and therefore was not subject to the County's biosolids land application oversight program. However, community complaints, discussions with area residents and a broader understanding of the limited regulatory framework governing biosolids-derived fertilizer products have prompted the County to pursue additional oversight measures related to LysteGro land application activities. County staff and representatives from Lystek have held several meetings to discuss potential pathways for

establishing an appropriate County oversight framework.

At the time current State and County biosolids regulations were developed, neither regulatory framework anticipated the use of field-injectable liquid fertilizer products derived from biosolids. As a result, incorporating products such as LysteGro into the County's existing regulatory structure has presented several challenges. County staff continue working to balance the protection of community health and quality of life with the recognition that LysteGro provides an alternative and potentially lower-cost fertilizer option for local agricultural operations.

County staff are continuing to evaluate potential regulatory approaches for this emerging product type, including the possible development of a compliance agreement or similar oversight framework. Staff anticipates returning with additional recommendations or a proposed oversight framework during 2026.

Section V – Biosolids Stakeholder Group Meetings Summary

The Biosolids Stakeholders Group meeting was held in a hybrid format – in person and virtually – on February 26, 2026. Participants in the Stakeholder Group Meeting included representatives from:

Central Valley and San Francisco Bay Regional Water Quality Control Boards, San Francisco Public Utilities Commission, Synagro, Lystek International, California Forever, Trihydro Corporation, Vallejo Flood and Sanitation District, Bay Area Clean Water Agency, California Association of Sanitation Agencies, City of Hayward, Coalition for Clean Water out of Washington State, Bay Area Biosolids Coalition, East Bay Municipal Utility District, Solano County Environmental Health, and area residents.

Environmental Health staff facilitated introductions of the attending agencies and stakeholders before turning the meeting over to the County’s PFAS research partner, Trihydro Corporation. The Trihydro team introduced the company, provided background regarding its work in the emerging PFAS field and summarized recent PFAS-related projects and research efforts.

Trihydro presented a high-level overview of PFAS compounds, including the history of PFAS development, common commercial and industrial uses and how the unique chemical properties of PFAS compounds contributed to their widespread incorporation into many household and industrial products. The presentation also discussed the increasing recognition of PFAS compounds as contaminants of emerging concern.

The research team summarized the selection process for the study and control sampling locations and reviewed the various analytical and sampling methods utilized throughout the project. Discussion also included project modifications and limitations resulting from budgetary constraints and weather-related conditions encountered during the sampling period. Sampling results and PFAS “fingerprint” charting analyses identifying the relative distribution of detected PFAS compounds were also presented.

Stakeholder comments and discussion focused on the detection limits associated with the different analytical methods, the most effective approaches for presenting and interpreting the project data and the usefulness and limitations of the lysimeter porewater sampling results.

The meeting concluded with a broader discussion regarding currently developing PFAS removal, isolation and destruction technologies, including treatment methods that remain primarily in laboratory development or pilot-scale testing phases.

Section VI: Summary of the 2025 Annual Bay Area Clean Water Agencies (BACWA) Memo to the Solano County Board of Supervisors

The Bay Area Clean Water Agencies (BACWA) is a joint powers agency that provides technical expertise, coordination and financial support on behalf of publicly owned wastewater and sanitation agencies throughout the San Francisco Bay Area. Collectively, BACWA member agencies operate within the nine Bay Area counties and provide wastewater and sanitary services to more than 7.1 million residents.

BACWA's principal agencies include the five largest wastewater treatment agencies in the Bay Area: East Bay Municipal Utility District, East Bay Dischargers Authority, San Francisco Public Utilities Commission, Central Contra Costa Sanitary District and the City of San José. The BACWA Executive Board is composed of one representative from each of these five founding public utility agencies.

BACWA reporting generally lags approximately 12 months behind current operations, meaning annual reports typically reflect information from approximately two years prior. However, because no permitted biosolids land application activities occurred within Solano County during the 2024 or 2025 application seasons, the memorandum received from BACWA in December 2025 reflected zero reported tonnage for those years.

In July 2025, the Bay Area Biosolids Coalition (BABC) was incorporated into Bay Area Clean Water Agencies (BACWA), which subsequently assumed the responsibilities previously carried out by the BACWA Biosolids Committee.

A copy of the BACWA memorandum is included as Attachment A to this report.