

**From:** Talks, DEP (DEP)  
**Sent:** Friday, October 16, 2015 3:05 PM  
**To:** Simpson, Deneen (DEP)  
**Subject:** FW: Comments for EO562

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**From:** Steve Pozner [ ]  
**Sent:** Tuesday, September 22, 2015 4:02 PM  
**To:** Talks, DEP (DEP)  
**Cc:** Tim Burbank  
**Subject:** Comments for EO562

I am the Vice President of Globalcycle, the first MADEP permitted commercial waste water treatment and recycling facility. Recently our recycling facility lost an opportunity to recycle a significant amount of non hazardous waste waters, due to antiquated regulations, that need to be amended- 314 CMR 18.00

There is a manufacturing facility located approximately 1 mile away from our recycling facility that could not discharge to the sewer due to non-compliance issue. This resulted in this generator having to temporarily utilize a holding tank for their non-hazardous wastewaters, which then would be shipped off-site for proper treatment. According to 314 CMR 18.05; this nonhazardous waste water had to be shipped to a hazardous waste permitted facility (even though this waste water was not characterized as hazardous waste). Because of this regulation (see below); a significant quantity of waste water was delivered to a hazardous waste TSDF for treatment and discharge to a water-way, instead of recycling for reuse (the preferred method). We strongly request that this regulation be amended to state that nonhazardous waste waters can be shipped off-site to a properly permitted facility (not just a TSDF)

314 CMR 18.05

(1) No facility may use a holding tank to accumulate or store on-site generated or off-site generated industrial wastewater prior to shipping for off-site treatment or disposal if it is or becomes feasible to discharge the industrial wastewater to a sewer system, except when: the facility is requested in writing by the local sewer authority to use a holding tank prior to shipping off-site in order to meet sewer operational or maintenance requirements; there are emergency or episodic situations; or, the industrial wastewater is shipped to a licensed Treatment, Storage and Disposal Facility (TSDF).

If you have any questions, please contact me. Thank you

Regards,  
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