



EO562 Input  
C/O Deneen Simpson  
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Dear Commissioner Martin Suuberg:

Thank you for the opportunity to comment on draft changes to 310 CMR 32.00 under Executive Order 562.

The Wastewater Advisory Committee (WAC) to the MWRA is a citizens' advisory committee to the MWRA on wastewater issues. We provide an independent forum for discussion of these matters. Environmental improvement, safety, cost and technical issues are all considered when formulating our recommendations.

WAC applauds the Department's proposed change to *310 CMR 32.00 Land Application of Sludge and Septage*, raising the state's extremely low limit for Molybdenum (Mo) in biosolids.

WAC has seen research supporting New York's limit of 40mg Mo/kg biosolids, but nothing to support Massachusetts' current limit of 10 mg/kg for pasture and 25 mg/kg for land application.

MWRA fertilizer pellets are reliably under the 40 mg/kg limit, but rise over the 25 mg/kg limit several times a year. Potential purchasers of the pellets, according to MWRA's contractor, need a reliable, year-round source, which MWRA cannot be under current limits. Therefore, only about 5% of them are sold in-state. If the limit were raised, the contractor estimates that roughly 30% of MWRA pellets could be sold in-state. As a result, roughly 13,000 gallons of diesel fuel for shipping (train & truck) would be saved.

Mo in MWRA pellets comes primarily from cooling systems, where it is used as a corrosion inhibitor. There are affordable alternatives. For MWRA to inspect and permit Mo discharges would mean hiring additional Toxics Reduction and Control (TRAC) inspectors.

In the meantime, DEP has banned organics from landfills for larger generators, a move WAC supports, and which WAC hopes will mean more recycling of organics through co-digestion. However, the Mo limit means that the resulting solids will not have a strong market in state.

Therefore, to save money and fuel and support the recycling of organic waste, WAC urges the DEP to raise the Mo limit to match New York's (40mg/kg).

Sincerely,

Taber Keally

Chairman, Wastewater Advisory Committee to the MWRA