



Kathleen Baskin, P.E.
Director of Water Policy
Executive Office of Energy and Environmental Affairs
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RE: Proposed changes to 310 CMR 31: Land Application of Sludge and Septage

Dear Director Baskin:

The Wastewater Advisory Committee (WAC) to the MWRA supports the Department of Environmental Protection'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. Under current limits, MWRA cannot be such a source. Therefore, only about 5% of MWRA pellets 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 an anti-corrosive. Alternatives include phosphates, which are not an element of concern for Massachusetts Bay, where Deer Island discharges. 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

WAC 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.