



July 18, 2005

Lee Dillard Adams
Department of Environmental Protection
627 Main Street
Worcester, MA 01608

RE: Proposed Amendments to Environmental Requirements for Biotechnology Facilities

Dear Ms. Adams,

Charles River Watershed Association (CRWA) is writing to express our concern about the proposed amendments to statewide wastewater effluent limits for biotechnology facilities.

All current efforts to reduce the levels of toxic pollutants in wastewater discharges recognize the importance of source control as a key element in any good wastewater management plan. The state standards for biotechnology facilities will be the only standard used for many Publicly Owned Treatment Works (POTWs), and must therefore set a high bar. Relying on the success of POTW's IPPs to achieve appropriate pollution controls puts an unfair burden on the local ratepayers, and is not likely to minimize the discharge of toxic pollutants.

Considered in total, the proposed amendments would significantly weaken effluent standards, resulting in increased adverse environmental impacts. The proposal does not seem to meet its stated goal to "strengthen and clarify environmental standards."

The most alarming measure is the proposed limit of 0.08 mg/l of mercury, a limit far above average current standards, and 80 times higher than the limit that has been established for the MWRA system. Efforts to reduce and/or eliminate mercury emissions would be significantly weakened by these proposed effluent limit reductions.

Furthermore, efforts to promote alternative wastewater management would be significantly hampered by these proposed changes. DEP should be setting high standards

for industrial dischargers, which will protect our environment, and our public health, as well as drive innovative technologies and solutions to meet high standards.

We appreciate your consideration of these comments and look forward to continuing to work with you on these important issues.

Sincerely,

Kate Bowditch
Senior Environmental Scientist and Project Director

cc: Bob Golledge
Arlene O'Donnell
Sarah Weinstein