



Ms. Marybeth Chubb, Director, Wastewater Division  
MassDEP, Bureau of Water Resources  
Division of Watershed Management  
Attention: Title 5 amendments for Nitrogen reduction  
100 Cambridge Street, 9<sup>th</sup> Floor  
Boston, MA 02114

dep.talks@mass.gov

January 30, 2023

**Re: Proposed Title 5 Amendments and NSA Watershed Permit Regulations**

Dear Ms. Chubb:

On behalf of the Yankee Onsite Wastewater Association (YOWA), this letter is in support of the proposed amendments to Title 5 which will result in the creation of Natural Resource Areas (NRAs) as a dedicated effort to protect the waters of Massachusetts and New England.

As the local affiliate for the National Onsite Wastewater Recycling Association (NOWRA), YOWA supports the onsite wastewater industry throughout New England. Our membership includes professionals servicing all aspects of this industry, including engineers and sanitarians, regulators, installers, and operation & maintenance professionals. The regulation changes proposed by MA DEP align with YOWA's goal to promote and support use of onsite wastewater systems to improve the overall health of our environment.

NOWRA is the largest organization in the country dedicated to representing the onsite wastewater industry. Their focus is on protecting water resources and educating on the public health benefits of septic systems. YOWA's mission is to take this national initiative and apply it locally. Onsite wastewater treatment systems service 85 million Americans, more than 25% of the country, but this wastewater option is often overlooked as part of the wastewater infrastructure conversation.

We support MA DEP's proposed regulation changes as it will address the need for reducing nitrogen and the resulting algae and water resource issues currently affecting our region. An effective tool in the onsite wastewater septic system industry, Innovative Alternative Treatment Systems (I/A) are a reliable method for removing nitrogen in wastewater. Advocating for the use of I/A technologies, to address the environmental issues in our area, is an excellent use of available resources. Centralized wastewater treatment plants are an option in some areas, however, will not address all of the properties served by on-site septic systems in need of



upgrade to improve the overall nitrogen loading for each NRA. There are many I/A technologies approved by MA DEP which currently provide nitrogen removal in thousands of onsite systems installed throughout Massachusetts. These technologies have been through rigorous third-party testing as well as years of real-life installations to support their continued use.

We at YOWA hope to continue to provide an integral part in the on-site wastewater industry as both advocates and educators for new and emerging technologies. We see an opportunity to partner with DEP to develop educational tools and promote the evolution of the operation & maintenance industry that will be necessary to support nitrogen reducing I/A systems.

With the implementation of these NRAs, and the increased use of I/A technologies as a tool to address local nitrogen issues, YOWA will continue to provide education and advocacy for onsite wastewater systems.

We support MA DEP in their efforts to address the increasing nitrogen issue in our region and offer our assistance to MA DEP as the new regulations are implemented.

Sincerely,

Alyssa Rusiecki  
YOWA President