



September 1, 2017

International Wastewater Services Flushability Group  
Steering Group  
Submitted via email to [info@iwsfg.org](mailto:info@iwsfg.org)

**Vincent Sapienza, P.E.**  
*Acting Commissioner*

To Whom It May Concern:

**Pamela Elardo, P.E.**  
*Deputy Commissioner*

The New York City Department of Environmental Protection (DEP) submits these comments on behalf of New York City (the City) on the International Wastewater Services Flushability Group's (IWSFG's) draft flushability guidelines (Guidelines).

**Bureau of Wastewater Treatment**  
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DEP appreciates the efforts of the IWSFG to develop a standard for flushability that adequately protects wastewater infrastructure. DEP also agrees with and supports the five critical standards for evaluation of flushability: environmental and health protection; toilet and drain line clearance; disintegration; settling; and biodisintegration. DEP, however, has reservations on the reliability of the reference documents used to establish standards in the proposed Guidelines and has several comments summarized herein.

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DEP supports the use of American National Standards Institute (ANSI) in the development of certain sections of the Guidance, specifically Environmental Health and Safety Requirements (IWSFG Publicly Available Standards (PAS) 1) and Toilet Clearance Test (IWSFG PAS 2A) that are referenced to ANSI and Criteria for Recognition as a Flushable Product (IWSFG Standard 1) which is partially referenced to ANSI (Fiber Analysis). DEP is familiar with ANSI and considers it reliable as a basis for establishing standards. Other standards in the Guidance reference other IWSFG documents with which DEP is not familiar, and we do not have any knowledge or experience with any of the methods provided. Therefore DEP cannot comment on their reliability as standards for determining flushability. IWSFEG should provide additional information and training about these IWSFG documents so that these proposed Guidelines can be better evaluated and any water utilities and municipalities looking to use the Guidelines can make informed decisions related to wastewater management.

DEP needs more information about the IWSFG documents used to develop the standards in the Guidelines to fully assess data and conclusions. Nonetheless, DEP offers the following specific comments on the Guidelines:

DEP supports the use of the "Slosh Box Test" (IWSFG PAS 3B) included in the Guidelines and does not support the use of the Accelerated Bench Top Disintegration Test (IWSFG PAS 3A). The Slosh Box Test is more representative of disintegration in the City's collection system than the disintegration test. The disintegration test using an 800 rpm propeller for two minutes is not representative for all sewer systems and should not be considered in establishing an industry wide guidance. The City's gravity powered sewers rarely agitate waste to the extent that would be reflected in the disintegration test.

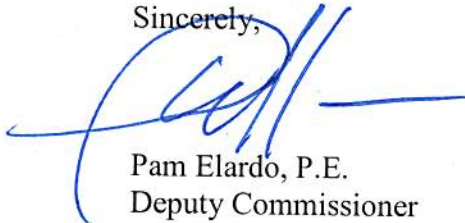
Rather, in dry weather conditions, waste often flows slowly from residences to the waste water treatment plants.

Concerning settleability, the Settlement Test (IWSFG PAS 4) should be based on conditions of a 4,000 gallon/day/square foot surface overflow rate in a primary clarifier during wet weather. Material that does settle should still pass the 6.33 mm sieve, and should not congeal into stringy material as a factor in determining flushability.

With regards to any Biochemical Oxygen Demand (BOD) limit considered in determining flushability, there should be a BOD limit of less than a quarter pound per wipe, especially if products are coated with ointments and fragrances. Additionally, the Guidelines should require that the pH of products should be 6 through 9; that any product or any particles resulting from disintegration should not become buoyant; that no plastics should be allowed; and please note that plastics less than 5 mm in diameter will be banned in personal products by U.S. federal legislation in the near future (H.R.1321, 2015).

Thanks you for the opportunity to comment on the proposed Guidelines and these draft standards. DEP is happy to continue to work with IWSFG to ensure that these standards are protective of a wide range of wastewater systems, and that the guidelines are incorporated into commercial practice. Should you have any follow-up questions or concerns, please contact me: 718-595-6924.

Sincerely,



Pam Elardo, P.E.  
Deputy Commissioner