



**Environmental
Protection**

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International Wastewater Services Flushability Group
Submitted via email to staff@iwsfg.org

To Whom It May Concern:

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) second draft of the Publicly Availability Specification (PAS) for Flushability.

At this time DEP does not have specific comments on the three revised PAS documents, Criteria for Recognition as a Flushable Product, Terms and Definitions for Determination of Flushability and Disintegration Test Methods, that were revised in response to the comments received. However, DEP would like to take the opportunity to express our appreciation of the efforts of the IWSFG to develop criteria and methods that adequately determine if a material identified as a "flushable" and subsequently flushed down a toilet is compatible with the associated downstream sewerage network. DEP continues to support IWSFG's efforts to establish five critical standards for evaluation of flushability: environmental and health protection; toilet and drain line clearance; disintegration; settling; and biodisintegration. Further, DEP supports IWSFG's application of rigorous performance thresholds to these standards for evaluation so they successfully identify whether materials marketed as flushable clear plumbing and disintegrate prior to reaching wastewater pumps and treatment equipment in a manner that does not interfere with the wastewater treatment promise or compromise any biosolids generated by the treatment process.

DEP is happy to continue to work with IWSFG to test the efficacy of these PAS documents to ensure that these standards are protective of a wide range of wastewater systems, including New York City's, 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