

QUESTION: Massachusetts fairly recently approved medical marijuana. A number of the growing/processing locations are proposed for areas served by on-site. To date, we've been inclined to treat the process water (from extraction of oils, etc) as equivalent to pharmaceutical wastewater and deal with it as an industrial wastewater and require that it be tight tanked and hauled.

For those states who have legalized medical and/or recreational marijuana, we were wondering how you have handled the wastewater from the processing.

Colorado: Please find attached a couple of informational docs that I cut and pasted from a few emails that I received through EPA referencing the CLV Injection Well program. Also attached are a couple of articles that I had on file regarding waste disposal from hydroponic grow facilities. Hopefully this gets you in the right direction.

Utah does not have any marijuana growing or processing locations so we don't have any experience with this. I think medical use will be up for another vote this year so I'll be interested in what everyone else does.

Oregon legalized it for recreation about a year ago, man.
in an email.

□that's as f

The state Ag folks regulate the growing of the marijuana, so hydroponic grow water is theirs...and I'm good with that.

We've mostly been involved in development of employee domestic facilities on larger grow operations. Folks who want to process marijuana into brownies, lollipops or whatever out of their house will apply for what we call an authorization notice to use an existing septic system, like we would for any home-based business that may impact the system. If inspector feels the system can handle it, they'll approve it.

If it's a larger scale industrial wastewater generated from marijuana processing it would go to our WQ permitting folks.

I live in Eugene, where the movie Animal House was filmed and is a college town. Seems like we have marijuana businesses on every street corner! Maybe the result is most processing happens in the cities. I don't know, we had a lot of questions in the beginning, but it seems to be getting dialed in.

Our regulatory construct, in Washington, is similar to what you are thinking about in Massachusetts. Below is an excerpt of an email I have sent out regarding fate of marijuana process water.

For context:

- "OSS" = septic systems
- WAC 246-272A is Washington's 0-3500 gpd onsite regulation.
- "Ecology" refers to our sister agency, Department of Ecology.

Note our conclusion at the end, highlighted in yellow here.

(Ecology)

WAC 314-55-097 Marijuana waste disposal –Liquids and solids

(1) Solid and liquid wastes generated during marijuana production and processing must be stored, managed, and disposed of in accordance with applicable state and local laws and regulations.

(2) Wastewater generated during marijuana production and processing must be disposed of in compliance with applicable state and local laws and regulations.

(3) Wastes from the production and processing of marijuana plants must be evaluated against the state's dangerous waste regulations (chapter [173-303](#) WAC) to determine if those wastes designate as dangerous waste. It is the responsibility of each waste generator to properly evaluate their waste to determine if it designates as a dangerous waste. If a generator's waste does designate as a dangerous waste, then that waste(s) is subject to the applicable management standards found in chapter [173-303](#) WAC.

WAC 246-272A (Definitions)

"**Industrial wastewater**" means the water or liquid carried waste from an industrial process. These wastes may result from any process or activity of industry, manufacture, trade or business, from the development of any natural resource, or from animal operations such as feedlots, poultry houses, or dairies. The term includes contaminated storm water and leachate from solid waste facilities.

(Ecology)

WAC 173-240-020 (Definitions)

(8) "Industrial wastewater" means the water or liquid that carries waste from industrial or commercial processes, as distinct from domestic wastewater. These wastes may result from any process or activity of industry, manufacture, trade or business, from the development of any natural resource, or from animal operations such as feedlots, poultry houses, or dairies. The term includes contaminated stormwater and also leachate from solid waste facilities.

WAC 246-272A-0020

(1) The local health officer:

(...)

(c) May not apply this chapter to industrial wastewater.

We have defined marijuana processor waste as industrial wastewater. As such it cannot be treated/disposed of in an OSS. We have been recommending that producers/processors capture their wastewater in a vault and ensure that it is treated/disposed of in accordance with WAC 314-55-097.

Pennsylvania has recently passed medical marijuana usage so we have not seen any proposals from these operations. We only allow residential type sewage to enter on-lot sewage disposal facilities, so only the restrooms from these operations will be allowed into the on-lot facility. All other waste will have to be characterized, treated and disposed of in a different manner. That's all I could say as of now.