

<u>Item</u>	<u>Who</u>	<u>Section &amp; Subsection</u>	<u>Comment</u>	<u>Suggested language</u>
<b>General/Policy/Legal</b>				
1	TPF SPU	Subpart A Water Right Considerations <b>WAC 173-219-100 Exclusive Right</b>	The concept that 90.46 says that the wastewater treatment plant owner is granted an exclusive right to the use of the reclaimed water <u>does not</u> convey any water right, therefore this section should not be titled in a manner that implies that the “exclusive right” is in fact a water right when it is not.	
	TPF SPU	<b>WAC 173-219-105 5 iii (C)</b>	It would be useful to know where the unconsumed portion of water, if any is returned.	
	TPF SPU	<b>WAC 173-219-160 Engineering Report</b>	<a href="#">Good comprehensive section</a>	
	TPF SPU	(n)	Why does anyone, other than ratepayers care what the system costs, unless the system will not be publically owned?	
	TPF SPU	General overall format	The proposed rules are a good compilation of the historic rules as well as integration of a few new ideas.	
	TPF SPU	Protection of Public Health and Environment	There are not a lot of new or significantly different regulations. Continued recognition that ALL receiving water bodies (surface and groundwater) must be protected to the full extent of the safe drinking water act and the clean water act are good elements of the rules.	

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	TPF SPU	Permit Conditions	As one of the few that have worked to revise the permitting process based upon the original RCW and guidance, I believe that the permit conditions in 290 and 295 are complete and offer certainty to the potential reclaimed water permit applicants.	
	TPF SPU	<i>WAC 173-219-435 Conveying Reclaimed Water in Surface Waters of the State</i>	This section and language is one of the better additions to the old guidance. RCW 90.03.030 was always there but the language of the guidance was not helpful.	
	TPF SPU	<i>WAC 173-219-420 Distribution System Requirements</i>	This section in one of the most troubling notions of the draft rules. Converting existing infrastructure from potable to reclaimed water should not be allowed unless it is a large transmission line with absolutely no connections to the line. The potential for cross connections and or supply of reclaimed water to customers is too great because there are too many uncertainties associated with connection records.	

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<b>Technical</b>				
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