

| City of Olympia Comments on draft Reclaimed Water Rule 5-19-2010 version | | | | | | | |
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| Section # | Subsection | Sec Title | Rule Version | Who | Type | Comment | Suggested revisions |
| 173-219 | 015 | 3a | 5/19/2010 | City of Olympia | | The City currently has existing Ordinance and End User Agreements in place. Would these need to be reviewed and approved by the lead agency or would they be grandfathered? Also, the language in this subsection indicates the generator is responsible for getting agency approval of contracts or ordinances. For Olympia, this seems to translate into: LOTT is responsible for agency-approval of Olympia's Ordinance. I can see that for the End User Agreements, but not the Ordinance. | Suggest allowing existing Ordinance and End User Agreements to remain as is. All future Ordinance and Agreements would be required to meet this chapter's requirements. |
| 173-219 | 025 | 1 | 5/19/2010 | City of Olympia | | User responsibilities should also include compliance with Ordinance and End User Agreements. | Add "and enforceable contracts or ordinances" |
| 173-219 | 090 | | 5/19/2010 | City of Olympia | | The "Vadose Zone" definition is difficult to read. | End the definition with "... due to tension saturation, or <i>between the land surface and localized perched groundwater.</i> " |
| 173-219 | 160 | 5c vi | 5/19/2010 | City of Olympia | | Is it necessary to use the word 'contaminants' here? It reads to me, to imply that reclaimed water is contaminated/contaminating. | Replace 'movement of contaminants' with "excessive application beyond agronomic rates" |
| 173-219 | 410 | 2 | 5/19/2010 | City of Olympia | | Waiver for chlorine residual should also be allowed for extensive pipeline lengths, not just impoundments/storage facilities. | Add "or any other infrastructure element or appurtenance" |
| 173-219 | 430 | | 5/19/2010 | City of Olympia | | Indicate who is responsible for ensuring this requirement is met. Olympia believes it should be the truck owner/operator. | |

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| 173-219 | 500 | 5 | 5/19/2010 | City of Olympia | | Indicate that hose bibs may not be allowed (are restricted) by local authority. | Add to the end of the last sentence, "... as directed by the potable water supplier's cross-connection control plan, or the locally adopted plumbing code or ordinance." |
| 173-219 | 500 | 2b | 5/19/2010 | City of Olympia | | Please specify DOH-approved air gap. | Replace "air gap separation" with "Washington State DOH-approved air gap separation." |
| 173-219 | 560 | 2 | 5/19/2010 | City of Olympia | | | First sentence: omit "general". Second sentence: omit the second "uses". |
| 173-219 | 660 | 4 | 5/19/2010 | City of Olympia | | This still seems to imply that Class A reclaimed water can be used to supplement drinking water. | Please insert "raw water or pre-treatment" prior to impoundments. |
| 173-219 | 700 | 6a and 6b | 5/19/2010 | City of Olympia | | It is clear that enforceable limits will be established after various considerations layed out under (6). It is not clear whether the enforceable limits would be based on either DW standards or GW standards exclusively, or a mix of the two, that is, by applying the most stringent on a parameter-specific basis. Clarify what is meant by depicting (a) and (b) as sentences, rather than connected with "; or". Or "and". Or "the more stringent of ...". Or other? | Use semi-colons rather than periods, if appropriate. |
| 173-219 | 700 | 7a, 7b, 7c | 5/19/2010 | City of Olympia | | Is the lead agency going to establish points of compliance at (a) and (b) and (c)? Or either a, b, or c ... or d? Clarify whether the periods should be "; or" or "and". | Use semi-colons rather than periods, if appropriate. |
| 173-219 | 700 | 7b | 5/19/2010 | City of Olympia | | Near what source? Should it say "the reclaimed water recharge location"? | |