

May 28, 2010

Tim:

The following comments are made on the Draft Chapter 173-219 WAC, Reclaimed Water Reuse Rule.

- 1) Should “predictable” be struck from Section 173-219-005(1) regarding regulatory reviews?
- 2) Should using greywater for toilet or urinal flushing be added to Section 173-219-010(2) since Department of Health has specifically excluded this use from the draft greywater rule?
- 3) Section 173-219-030 refers to the “Reclaimed Water Facilities Manual;” however, this reference has not been finalized. If the WAC is finalized prior to this reference, will Ecology allow reclaimed water use to proceed based on technologies that conform to the draft reference? Or, will reclaimed water use projects be required to wait until the Ecology reference is finalized for publication? What is the schedule for public review of the “Reclaimed Water Facilities Manual?”
- 4) Based on Section 173-219-040(c), does Ecology anticipate that there will be no new reclaimed water facilities permitted prior to the effective date of 173-219 WAC. If there are new reclaimed water facilities permitted prior to the effective date of 173-219 WAC, will they be exempt from a water rights impairment assessment as implied in Section 173-219-040(c)?
- 5) For Section 173-219-060, is there a way for all fees to be collected by the lead agency and then applicable fees distributed to the non-lead agency rather than permittees being required to pay fees separately to the lead and non-lead agency?
- 6) Should “as amended” be added to Section 173-219-130(2)(d)(vii) as to read “...(IBC),...(UPC), and other national model codes adopted **as amended** by the state of Washington?”
- 7) Should Section 173-219-140(2) specifically include the results of the water rights impairment assessment in the reclaimed water plan?
- 8) Should Section 173-219-145(3) specifically include the results of the water rights impairment assessment in the private utility capacity assessment?
- 9) Should Section 173-219-160(3) specifically include the results of the water rights impairment assessment in the engineering report, or would this be included in the planning report?

Thank you for the opportunity to provide comments on this important rule.

**Parametrix**

*inspired people . inspired solutions . making a difference*

Jeffrey L. Coop  
Sr. Engineer