

<u>Item</u>	<u>Who</u>	<u>Section &amp; page</u>	<u>Comment</u>	<u>Response</u>
<b>General</b>				
1	Clint Perry Evergreen Valley Utilities	WAC 173-219- 120 Submittal documents, Section 6,c	I believe that requiring construction to begin within 2 years of a submittal is overly burdensome. It may take more than two years from the submittal of the first document to the last, let alone having construction begin. I can see no reason for this type of deadline at all. A utility may be in the process, having submitted documents and then have to postpone the project due to unforeseen reasons (such as economic considerations), and not even know how soon the project will be able to be revived. Meanwhile more expenses will be incurred to apply for and receive an extension. If the project has not changed in any way, the utility should be able to pick up where it left off. At any rate, if ECY feels it really <u>needs</u> this drop-dead clause then it should be a minimum of 5 years.	
2	Clint Perry Evergreen Valley Utilities	WAC 173-219- 140 Reclaimed water plan. Section 1,h)	I suggest many of these items do not go together. The financial items should be listed separately and could be lumped in with “future facilities” The requirement of a discussion of “groundwater and surface water management” is so generic; I don’t know what it is asking for. Is this referring to storm water? If so I believe this requirement is dealt with in separate regulations. If something else, more clarification of intent is needed.	

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3	Clint Perry Evergreen Valley Utilities	WAC 173-219-350 Treatment facility reliability requirements, Section 1),.j), iii) Alarm System Requirements	The last sentence of this section is confusing and needs to be re-written for clarity.	
4	Clint Perry Evergreen Valley Utilities	WAC 173-219-370 Sampling and Analysis Reliability, Section 1)	I would suggest eliminating the words “with the exception of turbidity and total Coliform”. For a very small system I believe the permittee should be able to request a reduction in these monitoring requirements as well. ECY can always deny the request. For example, for a very small system doing vadose zone percolation, reduced monitoring might be appropriate.	
5	Clint Perry Evergreen Valley Utilities	WAC 173-219-520 Irrigation general requirements, Section 2), c), iv)	I suggest eliminating the words “and not create a nuisance”. This might be a way for people opposed to the use of reclaimed water to cause problems. Also, in who’s opinion is the irrigating a nuisance? The complainer, or ECY, or the courts? Exactly what is an irrigation nuisance?	
6	Clint Perry Evergreen Valley Utilities	WAC 173-219-660 Use in constructed wetland urban water features. Title and Section 1)	I would suggest eliminating the term “urban”. The term is limiting. Parks with wetland water features can easily occur in sub-urban or rural areas,	

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7	Clint Perry Evergreen Valley Utilities	WAC 173-219- 800 Ground Water Recharge – General Section 3), d), i)	I would suggest changing this to say “A ground water monitoring program may be required by the lead agency”. This would provide more flexibility. For example, a very small system may be doing vadose zone percolation in an area where it is several hundred feet to ground water and the cost of monitoring wells may be cost prohibitive to the project.	
8	Clint Perry Evergreen Valley Utilities	WAC 173-219- 820 Direct recharge, Section 2), b)	I would recommend eliminating the second sentence. <i>“This point of compliance shall not be further than the property boundary of the groundwater recharge site.”</i> This is to allow the permit writer more flexibility. Since there is no setback limitation from a property line for the groundwater recharge site, a point of compliance further away could possibly be appropriate.	
<b>Specific Technical</b>				
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<b>Format, Presentation, and Style</b>				
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Wordsmithing				
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Definitions				
1	Clint Perry Evergreen Valley Utilities	WAC 173-219-040 Definitions. <i>“Beneficial purpose” or “beneficial use”</i>	I would suggest eliminating the word “potable”. Reclaimed water can also be used to replace non-potable water (such as irrigation water) for other non-potable applications.	
2	Clint Perry Evergreen Valley Utilities	WAC 173-219-040 Definitions <i>“Surface percolation”</i>	I would suggest eliminating the words “or to unsaturated soil” from this definition. This is covered under definition of “Vadose zone percolation.”	
3	Clint Perry Evergreen Valley Utilities	WAC 173-219-040 Definitions <i>“Wastewater facility plan”</i>	As I read this it seems to say that all of the requirements of SERP <u>and</u> NEPA are required elements. I might suggest a language change to make sure it is clear that only applicable elements are requirements.	
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