

<u>Item</u>	<u>Who</u>	<u>Section &amp; page</u>	<u>Comment</u>	<u>Response</u>
<b>General</b>				
1	City of Lacey	Draft not complete	It would have been more meaningful to have been able to review a complete draft. We are particularly interested in section 155, which is blank.	
2	City of Lacey	Overall	Direction is provided for reviews, responding, etc. in X days but in most cases does not indicated if X days are working days or calendar days.	
3	City of Lacey	180 (3) (a)	Which “regulatory requirements” is this referring to?	
4				
<b>Specific Technical</b>				
1	City of Lacey	Section 160(2)(f)ii (4), pg 23	Clarify what is meant by “highest” and “in the underground” (is the latter intended to be “in the aquifer?”)	
2	City of Lacey	Section 160(2)(f)ii (5), pg 23	It is not clear what is meant by “premature” discharge	
3	City of Lacey	Section 220 (3) (a) ii, pg 28	It is not clear what is meant by “the lead agency shall consider...the process to consider the potential for water rights.”	
4	City of Lacey	220 (3) (a) (ii)	Won’t the process be outlined in Section 155?	
5	City of Lacey	220-4	Indicates the requirements for the permit application are in subsection 2; It appears they are actually in subsection 3.	
6	City of Lacey	250 (c)	How will the geographical boundaries be established?	

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7	City of Lacey	250 (d)	Who will draft and finalize the public notice?	
8	City of Lacey	Section 270 (2) (c) (iii), pg 33	Wouldn't water quality simply need to be consistent with permit limits in the general permit?	
9	City of Lacey	Section 320, pg 38	It seems odd that using the traditional method, the only difference between Class A and Class B water prior to disinfection is a turbidity limit.	
10	City of Lacey	420 (3) (a) and (b)	The Criteria for Sewage Works Design (Orange Book) has criteria for separation of water and sewer mains. Section 420 Subsection 3a is more stringent and 3b is less stringent than the Orange book. Also, the Orange book provides clearer direction. Recommend using C1-9.1.1 through C1-9.1.4 and adapting this section of the Orange Book to WAC 420 (3).	
11	City of Lacey	Section 430 (2) (a), pg 47	To be consistent with all other sections that require separate equipment for drinking water and reclaimed water, tank trucks that have been used for transporting reclaimed water should <u>not</u> be allowed to transport water for potable uses. Also, tank trucks used for transporting reclaimed water should be clearly marked similar to what is required in the labeling requirements under Section 460.	
12	City of Lacey	Section 430 (2) (b), pg 47	As long as there is an air gap for filling, there should be no problem filling a reclaimed water tanker with potable water.	

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13	City of Lacey	Section 440, pg 48 Pipelines and part (1)	To be consistent with requirements for ownership and control of sanitary control areas in WAC 246-190-135, reclaimed water pipelines and irrigation use should not be allowed within 100 feet of a potable water supply well.	
14	City of Lacey	Section 440 (3), pg 48	Setback requirements for unlined impoundments, ponds, and wetlands, especially for Class B water, should consider a size/volume component and whether there is overlap with a potable water supply well's delineated 6-month wellhead protection area.	
15	City of Lacey	Section 530(3)(e), pg 55	The potential for cross connections with the hoses used for reclaimed water uses should also be addressed here.	
16	City of Lacey	540 (2)	This section is very stringent for this industry. Many areas of the state irrigate with non-potable water and all have food processing (cleaning) requirements.	
17	City of Lacey	Section 710 (2), pg 64	Public health requirements for conveyance of reclaimed water for indirect use should be the same as for augmenting stream flows in Section 700.	
18	City of Lacey	Section 810(1), pg 66	Clarify whether the total nitrogen limit is determined as Total Kjeldahl nitrogen.	
19	City of Lacey	Section 810 (2) (b), pg 66	It is not clear what is meant by "a location just prior to application..."	
20				

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<b>Format, Presentation, and Style</b>				
2	City of Lacey	040 Bottom of page 6	Should the title 36 citation be included in the citations outlined on the following page?	
3	City of Lacey	Section 140, pg 19	Section k is blank.	
4	City of Lacey	180-3	Should “Manufacturer’s information...” be “b” in the outline?	
5	City of Lacey	205-2(c)	Add a space between ‘in’ and ‘Part’	
6	City of Lacey	Section 290 (5), pg 37	Delete. This was replaced by section 290 (4) (n)	
7	City of Lacey	Section 173-219-165	Section missing	
<b>Wordsmithing</b>				
2	City of Lacey	160-2(f)(ii)4	“retention time in the underground”? Should this be “retention time underground”?	
3	City of Lacey	180-3(b)	Why “before unit startup”? It should be “Equipment manufacturers’ operating instructions, information, warnings, and parts lists.”	
4	City of Lacey	180-3(d)(viii)	Delete “so as”. Redundant.	
5	City of Lacey	Section 800(1)(b), and Section 810	Rename “percolation recharge” in both places to “surface percolation” to be consistent with the Definitions	

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<b>Definitions</b>				
1	City of Lacey	Pg 5	“Beneficial use/purpose” should also reference DOH-approved uses of reclaimed water.	
2	City of Lacey	Pg 9	“Primary contact recreation” includes the word “skin” in front of diving	
3	City of Lacey	Pg 10	“Secondary contact recreation” should be its own definition and not included within “reliability assessment”	
4	City of Lacey	Pg10	“Stream flow augmentation...” the word “for” should not be capitalized	
5	City of Lacey	Pg 12	“wetland or wetlands” – typo on third to last word	