

<u>Item</u>	<u>Who</u>	<u>Section & page</u>	<u>Comment</u>	<u>Response</u>
General				
1	Don Perry	173-210-010 2) Purpose Page 3 of 71	“encourages the development of reclaimed water” is good but there is a concern that potentially reclaimed water will be held to a higher standard than wastewater and irrigation applications to the environment based on these proposed regulations.	
2	Don Perry	Page 5 of 71 “Agronomic rate”	Delete “and” after the deleted word “...amount of water”	
3	Don Perry	Page 5 of 71 “AKART”	Is this consistent with AKART for wastewater applications?	
4	Don Perry	Page 6 of 71 “Constructed treatment wetlands”	It would seem that if an impoundment was built for the sole purpose to store reclaimed water that it could fall under this definition. Was this intended for that to happen or just in the instances where truly constructed treatment wetlands are intended.	
5	Don Perry	Page 6 of 71 “Contaminant”	Suggest that you delete “any” and insert in its place “a”	
6	Don Perry	Page 7 of 71 “Ground Water Quality Criteria”	This definition may difficult to achieve and preclude reclaimed water from being considered in a great many applications since this definition seems to make reclaimed water be held to a higher standard than wastewater, potable water and/or irrigation water in similar applications.	

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7	Don Perry	Page 65 of 71 3) b)	<p>This may be difficult to achieve and may preclude reclaimed water from being considered in a great many applications since this seems to make reclaimed water be held to a higher standard than wastewater, potable water and/or irrigation water in similar applications. Since EPA is generating new criteria that will be included in these criteria the risk of investing in reclaimed water facilities will be increased with this definition. Also the cost of testing for all the criteria that are required for measuring what is in the reclaimed water will increase the cost of operation of these facilities because the testing for all of the chemicals that are proposed and are in place currently will be very costly.</p>	
8	Don Perry	Page 66 of 71	<p>WAC 173-219-810 2) The cost of pilot testing this and the time it will take to travel from the application point to the aquifer could be measured in decades and preclude the application of reclaimed water due to the unknowns involved in such a prolonged testing period and the costs associated with it to say nothing of the regulations that could change in that much time. Since many applications of reclaimed water will require additional soil treatment provided by the soils to reduce and or eliminate the elements of concern it would seem that years or decades of testing would eliminate reclaimed water from the options that might be available.</p>	
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