



STATE OF WASHINGTON

DEPARTMENT OF HEALTH

DIVISION OF ENVIRONMENTAL PUBLIC HEALTH

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October 10, 2017

Heather Bartlett, Water Quality Program Manager
Washington State Department of Ecology
Post Office Box 47600
Olympia, Washington 98504-7600

Dear Ms. Bartlett:

The Washington State Department of Health fully supports the proposed reclaimed water rule, chapter 173-219 WAC.

We appreciate the long-standing public health protection partnership we've established with the Department of Ecology (Ecology). As two entities concerned with the human impacts and demands on the environment and how that affects the health, safety, and welfare of the people of Washington State, we share many common goals.

Reclaimed water can extend water supplies for drinking water where aquifers are declining faster than being recharged, and where additional population growth is occurring. It also enables business growth such as for technology projects and agriculture in eastern Washington. It may reduce wastewater effluent discharge to marine waters where we need to protect shellfish as a food product and other ecosystems.

We have worked with Ecology staff throughout the rule-making process as directed in chapter 90.46 RCW, and have focused our public health protection efforts on ensuring safe and reliable production and use of reclaimed water in the following areas:

1. Production facilities

- Treatment process details for coagulation, filtration, disinfection
- Control systems
- Redundancy of key equipment and controls
- Diversion or retreatment for off-spec water
- Reliability of the specified water quality and continuous delivery to customers
- Employment of qualified and state-certified operators.

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2. Use area protections
 - Matching the right water quality for each type of beneficial use in order to account for possible human contact, and for protection of future drinking water supply
3. Distribution and use areas
 - Maintaining required water quality from generation point to use site
 - Cross-connection control to protect higher quality water from lower quality water
 - Setbacks from water bodies and other features
 - Public and utility notices and warnings
4. Department of Health role as permitting agency
 - Identifying when we will be lead agency
 - Ensuring we provide public health consultations when asked
 - Ensuring we consult with Ecology on environmental issues, all water rights impairment analyses, and permit requirements
 - Ensuring the reclaimed water rule works with other department regulatory obligations, including permitting, compliance, and enforcement

We support the changes made to the rule drafts over the lengthy time we've worked together and with the rule advisory committee, and other interested parties, resulting in the proposed rule language. It's now concise, logical, and much more complete. It includes multiple public health protections and spells out both of our agencies' (and the generator's) responsibilities in the review, approval, and permitting of reclaimed water facilities and uses, and our roles as we work together.

Sincerely,



Clark Halvorson,
Assistant Secretary

cc: Jocelyn Jones, Rule Writer, Ecology
Denise Lahmann, P.E., Department of Health