

**From:** E S PACKARD  
**To:** [Jones, Jocelyn \(ECY\)](#)  
**Subject:** Sierra Club Washington State Chapter comments on Ecology's Draft Rule on Reclaimed Water  
**Date:** Friday, October 13, 2017 4:05:09 PM  
**Attachments:** [Comments on Draft Rule on Reclaimed Water from Sierra Club Washington State Chapter.docx](#)

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Ms. Jones,

Please accept the attached comments from the Washington State Chapter of the Sierra Club. Please feel free to contact me if you have any questions.

Elaine Packard

If this email contains an attached file named winmail.dat, please ignore it.



Washington State Chapter Sierra Club  
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Jocelyn W. Jones  
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Water Quality Program  
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Dear Ms. Jones:

The Washington State Chapter Sierra Club appreciates the opportunity to comment on the Washington State Department of Ecology's (Ecology) Draft Rule for reclaimed water (RW). The rule-making is to provide a regulatory framework to encourage and permit production, distribution and beneficial use of reclaimed water. These uses are for: irrigation, surface water augmentation, release to wetlands, commercial/industrial/institutional, groundwater recharge, and potentially direct potable use.

Our concerns about using RW are:

- EPA does not require testing for many, if not most, contaminants in waste water.
- Many scientific studies on RW indicate that many contaminants are not removed during treatment. Contaminants of emerging concern, ultrafine particulate matter, and plastic fibers are just a few examples that pass through treatment.
- Some studies have shown that food grown on land irrigated with RW has the presence of contaminants from the RW.
- Whether the RW returned to streams and wetlands will meet the water quality standards of the Clean Water Act.
- Whether the RW injected into aquifers, a process which in various ways can contaminate groundwater, will protect public drinking water systems.
- There are no long-term studies of RW use as potable water.

We believe that there is a need for more consideration of the potential risks of using RW before any use is recommended and approved. Your stated qualitative benefits are to protect public health and safety; enhance water quality for ground and surface waters; wise management of water supplies to replace potable water; contribute to restoration and protection of instream flows; and respond to population growth and climate change. We are not assured that your rule will meet your qualitative goals. Provided that Washington State has a need to use RW, we encourage Ecology to follow the precautionary principle which guides us that if there is a suspected risk of causing harm to the public, or to the environment, and in the absence of scientific consensus (that the action or policy is not harmful), the burden of proof that it is not harmful falls on those taking that action.

We also urge Ecology to study the advanced treatment and reuse methods in which European countries have invested and to encourage water conservation and efficiency in our state.

Sincerely,

Elaine Packard, Chair  
Water & Salmon Committee  
Washington State Chapter Sierra Club