

December 29, 2017

Ms. Stacey Callaway  
Water Quality Program  
Department of Ecology  
PO Box 47696  
Olympia, WA 98504-7696

Dear Stacey,

Here are my comments for the draft copy of the DOE's proposed regulation of winery wastewater.

S1.B3 – Why are mead and cider producers excluded from the regulations? It seems inequitable that competitors to wineries will not face the same regulatory burdens. In essence mead and cider producers will have a competitive edge because they are not subjective to the same intense water waste regulations as proposed for wineries.

S1.B5 – Nowhere is listed the opportunity to capture, treat and reuse wastewater. The technology exists to clean the wastewater to the point that it can be reused in the winery. For example, Free Flow Wines in Napa reuses 97% of their wastewater. Car wash facilities capture their wastewater and reuse it. Other industries reuse wastewater.

If a winery is able to capture, treat and reuse their wastewater then that winery should be exempt from applying for a general permit.

S2. 3C Do not accept trucked or hauled waste from off site to be discharged to your Waste management system

What if two neighboring wineries want to share a double lined lagoon so as to decrease the construction and operation costs? Does S2.3C or other regulations preclude wineries sharing a double lined lagoon or other wastewater treatment systems?

S3.1.b.v.C. And Table 6 "Beneficially reuse wastewater". See my comments above. Where am I allowed to treat and reuse wastewater?

"Beneficially reuse residual solid winery waste". It would appear that runoff from composting residual solid winery waste could enter the water supply because compost gets rained and snowed upon and there will be some leaching of the compost into the ground. Therefore composting would not be permitted. It should be cleared up that composting of residual solid winery waste is permitted.

S9. Residual Solid Winery Waste Management

See my comments about S3.1.b.v.C. Does not appear that composting is permitted.

#### S11. Domestic Sewage

Can an existing single drain field accommodate treated winery wastewater and treated domestic sewage?

S.13.A.3 This is Orwellian and Draconian. If a winery chooses to go beyond what is required in terms of testing wastewater they should not be compelled by force of law to share data that is not required by DOE.

S.13. Removed Substances – What are wineries supposed to do with the removed substances? Toss into a landfill?

That is all I have for now.

Kindest Regards,

Brett Isenhower  
Isenhower Cellars