

DEPARTMENT OF PUBLIC WORKS

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Kevin C. King, P.E., Director

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June 12, 2015

William Tillman, P.E.
WYDEQ Water Quality Division
Herschler Building-4W
122 W 25th Street
Cheyenne, WY 82002

RECEIVED

JUN 15 2015

WATER QUALITY DIVISION
WYOMING

Re: Comments on WDEQ Proposed Water Quality Rules changes to Chapters 15 and 25

Dear Mr. Tillman,

We appreciate the opportunity to comment on the proposed changes to the above-referenced Chapters. Campbell County currently has a Delegation Agreement with WDEQ for permitting and inspection of residential small wastewater facilities, publicly owned and controlled sewage collection systems, and publicly owned and controlled water distribution facilities. We have an excellent working relationship with WYDEQ staff members and assist with inspections of WYDEQ permitted commercial small wastewater systems.

In review of your proposed rules changes, we offer the following comments:

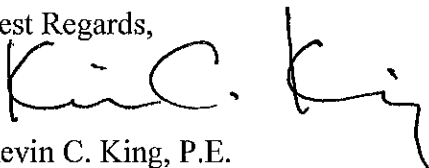
- (1) Line 205. We are concerned about the reduction of the gallons per day (gpd) shown in your proposed Table 1 Residential Design Flow Rates per Bedroom. The table starts with 150 gpd for one bedroom, but reduces flow as the number of bedrooms goes up. In recent years, Campbell County has increased our gallons per day to 200 per bedroom, in part to compensate for water softener recharges, but also due to a number of system failures. This increase in design flow has resulted in a substantial decrease in system failures. Even with your proposed new requirement that two bedrooms to be added for an unfinished basement, our current chart still requires more square footage. Even though our Delegation Agreement allows us to be more stringent than your minimums, we are concerned for Counties without this Delegation Agreement as they may have more system failures under the proposed reduced design flow requirements.
- (2) Line 520. Your proposed rules limit the sidewall height credit for leach lines to 12 inches maximum below the flow line of the inlet pipe. In Campbell County, we currently utilize three feet but do not reduce the flow for multiple bedrooms like your proposed rules do. The three-foot sidewall allowance, along with our increased flow rate per bedroom, has worked well.
- (3) Line 562. We are unsure on how you propose to perform percolation tests on the one foot of replacement soil in systems with percolation rates of less than 1 minute per inch. Appendix A does

not appear to address this particular test. The proposed change states “The soil absorption system shall be sized based on the percolation rate of the fill material.” With one foot of replacement soil on the bottom of the trench and nothing on the sidewall, the percolation rate on the trench bottom may slow, but the rate for the sidewalls of the trench will not.

- (4) Line 636. With your proposed change to a minimum cover depth of only 6 inches over the septic tank, there will be an increased chance of the top of the tank and both the inlet and outlet lines for the tank freezing. We currently request a minimum depth of 24 inches cover over the top of the septic tank in Campbell County, helping protect these components from freezing.
- (5) Line 1631. We are concerned about the proposed changes to the grey water system (spray irrigation of grey water is not permitted) and not being able to sprinkle grassy areas in large yards or pastures. By only allowing piping to trees and bushes, the extra money to install grey water systems in residential settings may be prohibitive. In Campbell County we have quite a few of these systems installed where they use the grey water to water the lot and/or pasture for their horses and cows on small acreage.

We look forward to seeing how the final rules take shape. If you have any questions on our comments, please contact me at your convenience.

Best Regards,

A handwritten signature in black ink, appearing to read 'K.C. King', written in a cursive style.

Kevin C. King, P.E.
Director

cc: Dave Bagley, EQC Chairman
Keith Bowar, Building Code Official
Robert Palmer, Commissioner's Administrative Director