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**WATER QUALITY DIVISION  
WYOMING**

16 June 2015

Wyoming Environmental Quality Council  
% DEQ/WQD, Herschler Building 4 West  
122 W 25<sup>th</sup> Street  
Cheyenne WY 82002

RE: Comments on Proposed Revisions the Water Quality Rules and Regulations, Chapter 25

Dear Ladies and Gentlemen:

I thank you for this opportunity to make comments on the proposed revisions of the Water Quality Rules and Regulations, Chapter 25. I find the proposed regulations unnecessarily complex and in several instances, too restrictive. Chapter 25, Small Wastewater Systems, is unique among Water Quality regulations in that it is read and used by an individual home or property owner as opposed to professional staff employed by the regulated community. Consequently Chapter 25 needs to be written clearly with a minimum of technical jargon. The proposed regulation is needlessly complex with unnecessary technical jargon. My comments on certain sections of Chapter 25 follow in order of my perceived importance of the topic, not necessarily in the order that the sections appear in the proposed Chapter 25.

Section 15, Privies; and Section 16, Greywater Systems should both be identified as allowed by "permit by rule" with no correspondence required with DEQ or the delegated authority required unless specific rules are developed by the delegated authority requiring permitting. The rule should restrict the use of privies to properties not accessible to community operated wastewater systems or permitted small wastewater systems.


Section 16, Greywater Systems, is far too restrictive. The first sentence of the proposed regulation "It is the intent of this section to encourage and facilitate the productive and safe reuse of greywater from domestic wastewater." is blatantly wrong. The proposed regulations effectively eliminate any legal use of greywater. It should be shortened to two sentences. "Greywater systems are permitted by rule. Greywater systems must not allow a discharge off of the residential property where the wastewater system is generated. These two sentences are essentially the summary of the newly adopted California Graywater Standard. Additional information on the California standard can be found at <http://oasisdesign.net/greywater/law/california/currentcode/>. Greywater reuse from other than residential wastewater sources shall be treated as land application of wastewater subject to the requirements of Chapter 21, DEQ/WQD R&R" Historically, across the nation there have not been health problems associated with the use of greywater. DEQ doesn't need to try to solve a problem that does not exist. The concern about washing diapers is unfounded. If the family is using enough soap and bleach to get the diapers clean, the wastewater will be safe for use as greywater. The "(unless soiled diapers are serviced)" needs to be removed from the definition of greywater. People that are willing to go to the work to use greywater are very passionate about water conservation and the environment. DEQ should not be making it difficult when it has been demonstrated that there are not health issues or water contamination issues resulting from the practice. Wyoming is an arid state where minimizing water consumption by "using every drop" is just good common sense.

Section 9, "Septic Tanks and Other Treatment Tanks" constitutes unnecessary abuse of the regulated community. The DEQ/WQD has maintained a list of septic tanks previously approved for use in Wyoming for about 3 decades. The seemingly minor adjustments in the dimensional requirements for septic tanks result in over 90% of the septic tanks currently being sold in Wyoming no longer being in conformance with the regulations. The regulations need to be adjusted so that at least 90% of the tanks currently being manufactured and used in Wyoming meet the regulation. There is an excellent history of the currently manufactured tanks functioning properly. All of the tanks manufactured in Wyoming are precast concrete. For the manufacturer to alter the pre-casting forms is an expensive undertaking. Ultimately the homeowners will be forced to pay the additional and unnecessary expenses. The light weight plastic tanks being sold in Wyoming are shipped in from national manufacturers. The Wyoming market is so small that these manufacturers will not be altering their product to meet Wyoming Standards.

Section 4, Design Flows, Tables 1 and 2 are unchanged from the numbers used forty years ago. These tables fail to take into account the reduced water usage as a result of the national standards for low flow plumbing fixtures and energy efficient appliances. The daily flow numbers are all much higher than today's water consumption as verified by metering in numerous Wyoming systems.

I request permission to make an oral statement at the public hearing scheduled for July 8, 2015. The oral statement will be restricted to the topics of these written comments and will not employ any digital presentation.

Sincerely;

A handwritten signature in cursive script that reads "Louis B. Harmon".

Louis B. Harmon PE-LS-PG