

Potential GWAC Discussion Topics Following Review of Ver 1 Draft Reg.

Scope Issues

1. Should regulations include additional sectors/scales?
 - a. Commercial
 - b. Multi-unit residential
 - c. Institutional

Approval & Oversight Issues

2. Single Residential Toilet Flushing: Oregon requires NSF 350 technology and leaves it to plumbing permits. No additional approvals or reporting is required.
3. Operating Permit Issue:
 - a. Single Residential (Propose “No”)
 - b. Multi-residential, Commercial, Institutional (Propose “Yes”)
4. Should we allow a Simple Graywater System Option for Single Household Setting, e.g., like Santa Barbara, CA system registration?
<https://www.santabarbaraca.gov/civicax/filebank/blobdload.aspx?BlobID=183250>
5. Operating permits: One commenter expressed operating permits to be undesirable. This comment may be reasonable for single residential households where perhaps a construction permit could suffice; however, for multi-unit residential or commercial, an operating permit might be reasonable.
6. Enforceability: What are reasonable expectations for government oversight? What is the responsibility of the owner/operator? How to manage liability of government oversight bodies? What is the intent of these regulations as far as enforcement goes (residential vs commercial)? What are expectations regarding monitoring and reporting as far as enforcement goes (residential vs commercial)?
7. Monitoring
 - a. Require for Installation quality verification only (Type 3 quality) in commercial, multi-unit residential and institutional?
 - b. Require for periodic permit renewal?
 - c. Require at time of property transfer?

Approving Authority Issues

8. Who and what the approving authority is needs to be much more clearly defined. Do the regs need to indicate three interacting agencies are needed to govern the full range of graywater system options? (WSSC comment #F)

9. Should MDE regulations call for the adoption of local ordinances and regulations including changes to plumbing codes? (WSSC #G)
10. How best to reflect desired International Plumbing Code elements?

Technical Issues

11. Should we have Type 2 treated graywater?
12. Graywater flow estimates
13. Rule of thumb for wastewater strength to avoid PE certification? Are dishwasher, kitchen sink and blackwater flows sufficient?
14. When to require PE design certification?
 - a. Commercial, institutional, multi-residential? (toilet flushing, irrigation?)
 - b. Volume threshold?
15. Clarification on 04.D & E "Avoid" and ponding.
16. Tank venting and odor control. How much detail to include in the Reg vs relying on plumbing code?
17. Graywater flow volumes and design flows.
18. Can we presume that wastewater concentration will not be too strong for onsite wastewater treatment systems if laundry water is not included in the graywater that is diverted? How should the regulation ensure wastewater strength does not exceed a threshold?

Possible GWAC Recommendations:

Change the statute's distance to groundwater to be consistent with septic system rules?