



May 22, 2025

Dr. Mary Anne Nelson
Idaho Department of Environmental Quality
1410 N. Hilton
Boise, ID 83706
Mary.Ann.Nelson@deq.Idaho.gov

Subject: Docket 58-0116-2501 Comments – Wastewater Rules

Dear Dr. Nelson,

Please accept this letter as additional public comment to the negotiated rulemaking docket No. 58-0116-2501, Wastewater Rules.

Comment#1:

Substitute Responsible Charge Operator- 203.01 and 409.03.c

While we agree that the previous rules did require the designation of a substitute responsible charge operator, it also added that that requirement was only “at such times as the responsible charge operator is not available” (previously 203.03). This allowed some flexibility for systems as long as their responsible charge operator was available. Please include the previous language “at such times as the responsible charge operator is not available” to the updated rules.

Requiring a system to designate a substitute responsible charge operator “at all times” may be challenging for many systems in the state. Each system has the obligation to employ or retain one appropriately licensed operator to be designated as the facility’s Responsible Charge Operator. By re-writing the language as it is proposed, the Department is essentially requiring each facility to have two responsible charge operators “at all times”. This can be challenging financially for many systems who may not have budget for two positions. This can also be challenging when staff leave a facility. As the rules were previously written, if the backup responsible charge operator quits, the main responsible charge operator must be available at all times, but the facility doesn’t have to immediately designate another responsible charge operator. They have time to hire, train, and license a new operator to eventually fill the backup responsible charge operator. It will be challenging for many facilities to always meet this requirement as written.

Comment #2

Design and Construction of Wastewater Pipelines 430.02.o.iii

The requirement specifying that crossings must be perpendicular will impact development as it removes the flexibility to cross at slightly varying angles. Please consider rewording to allow some flexibility while maintaining the intent to cross at “generally perpendicular angles”.

The City of Meridian appreciates the opportunity to submit these comments and looks forward to working with our State and local partners in the development of these important rules. Should you have questions concerning our comments, please feel free to contact me.

Sincerely,

A handwritten signature in black ink, appearing to read "Laurelei McVey". The signature is fluid and cursive, with a long horizontal stroke at the end.

Laurelei McVey
Public Works Director
City of Meridian
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