

From: [Jason Peppin](#)
To: [Mary Anne Nelson](#)
Cc: [Peter Adams](#)
Subject: Public Comment for Wastewater Rules, Docket # 58-0116-2501
Date: Tuesday, August 19, 2025 12:28:32 PM
Attachments: [image001.jpg](#)

Hi Mary Anne,

Panhandle Health District would like to submit public comments for the negotiated rule making process for IDAPA 58.01.06.

This public comment contains two requests for changes to IDAPA 58.01.16, the Wastewater Rules during the Negotiated Rulemaking process.

The first request is to not delete "Pollutant" from the definitions section. "Pollutants" are defined in the recently revised IDAPA 58.01.03, and the definition points to 58.01.16. If we delete "Pollutant" from 58.01.16, the definition in 58.01.03 will point nowhere.

The second request concerns gray water. I would like to make a request that we edit the definition for "Gray Water" (58.01.16.010.28). I think we should simplify it so that it is "*Domestic wastewater that does not contain ~~blackwaste wastewater from toilets, kitchen sinks, dishwashers, cloth washing machines, and water softeners.~~*"

Definitions for gray water from our neighbors are all over the place. I found two definitions in Oregon. In Oregon, "gray water" [is defined as](#) "*shower and bath waste water, bathroom sink waste water, kitchen sink waste water and laundry waste water.*" It is [also defined as](#) "*household sewage other than "black wastes," such as bath water, kitchen wastewater, and laundry wastes.*" So while our definition excludes kitchen sinks and clothes washing, Oregon specifically includes them.

In Washington, "Greywater" [is defined as](#) "*sewage from any source in a residence or structure that has not come into contact with toilet or urinal wastes, including bathtubs, showers, bathroom sinks, washing machines, dishwashers, and kitchen sinks.*" That is a poorly worded definition, but it is saying greywater cannot include blackwaste but can include wastewater from bathtubs, showers, bathroom sinks, washing machines, dishwashers, and kitchen sinks.

In Montana, "Gray Water" [is defined as](#) "*wastewater that is collected separately from a sewage flow and that does not contain industrial chemicals, hazardous wastes, or wastewater from toilets.*"

In Utah, "Graywater" [is defined as](#) "*wastewater from bathtubs, showers, bathroom washbasins, clothes washing machines, or laundry tubs. Graywater does not include wastewater from toilets, kitchen sinks, photo lab sinks, dishwashers, water softeners, garage floor drains, or other sources that pose a public health hazard.*"

In California, "Graywater" [is defined as](#) "*untreated wastewater that has not been contaminated by any toilet discharge, has not been affected by infectious, contaminated, or unhealthy bodily wastes, and does not present a threat from contamination by unhealthful processing, manufacturing, or operating wastes. 'Graywater' includes wastewater from bathtubs, showers, bathroom washbasins, clothes washing machines, and laundry tubs, but does not include wastewater from kitchen sinks or dishwashers.*"


So as you can see, there is a lot of variability in defining gray water around the country. The unifying factor appears to be the exclusion of blackwaste. I think we should just specify that gray water in Idaho has to be domestic wastewater and has to exclude blackwaste. This would simplify the gray water permitting process in

Idaho greatly and would provide new options for people who want to reuse their wastewater.

Thanks for considering these two suggested revisions.

Please let me know if you have any questions about this public comment, or if I should submit them separately through the DEQ website.

Thank you,

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