



PETITION FOR ADOPTION, AMENDMENT, OR REPEAL OF A STATE ADMINISTRATIVE RULE

Print Form

In accordance with [RCW 34.05.330](#), the Office of Financial Management (OFM) created this form for individuals or groups who wish to petition a state agency or institution of higher education to adopt, amend, or repeal an administrative rule. You may use this form to submit your request. You also may contact agencies using other formats, such as a letter or email.

The agency or institution will give full consideration to your petition and will respond to you within 60 days of receiving your petition. For more information on the rule petition process, see Chapter 82-05 of the Washington Administrative Code (WAC) at <http://apps.leg.wa.gov/wac/default.aspx?cite=82-05>.

CONTACT INFORMATION *(please type or print)*

Petitioner's Name George Danilov
Name of Organization _____
Mailing Address PO Box 125
City Curtis State WA Zip Code 98538
Telephone 360-515-7719 Email georgedanil@protonmail.com

COMPLETING AND SENDING PETITION FORM

- Check all of the boxes that apply.
- Provide relevant examples.
- Include suggested language for a rule, if possible.
- Attach additional pages, if needed.
- Send your petition to the agency with authority to adopt or administer the rule. Here is a list of agencies and their rules coordinators: <http://www.leg.wa.gov/CodeReviser/Documents/RClis.htm>.

INFORMATION ON RULE PETITION

Agency responsible for adopting or administering the rule: _____

1. NEW RULE - I am requesting the agency to adopt a new rule.

The subject (or purpose) of this rule is: _____

The rule is needed because: _____

The new rule would affect the following people or groups: _____

2. AMEND RULE - I am requesting the agency to change an existing rule.

List rule number (WAC), if known: 246-272A

I am requesting the following change: see attached proposals below

This change is needed because: the existing rule does not fulfill the goal of environment protection efficiently enough

The effect of this rule change will be: efficient protection of the environment.

The rule is not clearly or simply stated: _____

3. REPEAL RULE - I am requesting the agency to eliminate an existing rule.

List rule number (WAC), if known: _____

(Check one or more boxes)

It does not do what it was intended to do.

It is no longer needed because: _____

It imposes unreasonable costs: _____

The agency has no authority to make this rule: _____

It is applied differently to public and private parties: _____

It conflicts with another federal, state, or local law or rule. List conflicting law or rule, if known: _____

It duplicates another federal, state or local law or rule. List duplicate law or rule, if known: _____

Other (please explain): _____

Dear WA SBOH members,

This petition is aimed to attract your attention to the fact that current WAC 246-272A and accompanying legislation establish a condition, which forces the land owners in WA spend tens of thousands of dollars for construction of an OSS in their properties.

It's evident that there are multiple cases when a property owner is unable to pay such money and either forced to abandon the property or, which frequently happens, use methods of WW treatment, which are not listed in WAC 246-272A, and then being prosecuted by multiple Code enforcement officers. It's necessary to note that, when prosecuting such land owners, the Code enforcement officers never bother to prove that the land owner polluted the environment.

The reason for the prosecutions is always the fact that the land owner does not have money to obtain an official permit, and, instead of helping such people, administration prefer to deprive the owner of the last possession. Administration does not pay any attention to paragraph 25 of Universal Declaration of Human Rights (UDHR), which stands: **Article 25. (1) Everyone has the right to a standard of living adequate for the health and well-being of himself and of his family**, including food, clothing, **housing**, and medical care and necessary social services...

Is such situation necessary to obtain the goal of WAC 246-272A, which is: "to protect the public health by minimizing: a) The potential for public exposure to sewage from on-site sewage systems; and (b) Adverse effects to public health that discharges from on-site sewage systems OSS may have on ground and surface waters."?

Absolutely NOT, because the Code contains many **arbitrary and excessive requirements**, which in many cases contradict each other, don't have good scientific ground, complicate construction of the OSS and remove the land owner from the participation in this process except making the owner a source of thousands of dollars to the administration and businesses appointed by the administration.

The Code removes the land owner from the process of protecting the environment and just delivers him or her one duty: to pay money to the administration.

It's evident that cutting the costs of and making the OSS construction affordable ensures safety of the environment. And this is easily achievable just with involving the land owners into the process. But is it possible to simplify the process of OSS construction and give the property owners the right to define the most efficient and economically optimal methods of environment protection, which fits their budget?

Yes, it is possible. To achieve this, it's necessary to admit that the current content of the WAC 246-272A is obsolete and adjust it to the modern state of knowledge about WW treatment methods. During the last couple of decades WW treatment technologies made a remarkable progress. Many people understand this and only WA WW Section holds the obsolete treatment technology for some obscure reasons.

The following exemplifying content of the Code is suggested to modernize and simplify the technology and make it land owner friendly:

The Code should:

1. Identify the major threat to the environment and public health coming from the human dwellings, which is black water (BW) containing human faeces.
2. Describe simple and comprehensive methods of how to separate it from other types of organic wastes, which are: a) kitchen waters, b) waters from shower, dish and clothes washers, and c) solid organic wastes.
3. Describe the most efficient method of treatment of BW, which is Aerated Treatment Units (ATU), and define parameters of such units in a Public Domain BW Treatment.
(comment: many companies studied and developed the ATU technology and systems with impressive results (way batter than A/DL3), but this technology is marginalized in WAC 246-272A as a proprietary, which causes the certified designers neglect it and hampers its installation, making it very expensive.)
4. List the methods of gray-water treatments and recycling.
5. Describe the most efficient methods of converting solid organic wastes into compost. For the single family houses the most efficient is aerated composting tank. The Code shall identify parameters of such tanks and give recommendations of use.
6. Identify parameters of methods of dispersal of treated waste waters, giving priority to gravity drain-fields as the most reliable and efficient, where the major parameters are absorption and filtration properties.
7. Describe the methods and process of installation of the treatment and dispersal systems of OSS, giving the owners a choice between DIY installation and hiring a contractor.
8. Describe the process of certification and registration of WA OSSs.

(Comment: A team of certified inspectors should be organized like it is done in WA PUDs).

Such exemplary content of the OSS Code establishes a good road to simplifying and democratizing of the OSS installation, removing the load from arbitrary (frequently excessively oppressive) judgments of the Code Enforcement Officers, and putting it onto the shoulders of the property owners.