

July 12, 2024



Mr. Justin Scott, P.G.
UIC Program Manager
Wyoming Department of Environmental Quality, Water Quality Division
200 W 17th St, 2nd Floor, Cheyenne, WY 82002

RE: Teton Science Schools Wilson Campus (Facility ID No. WYS-039-012); Proposed Class V (5E3) Domestic Subsurface Fluid Distribution System Permit (No. 2023-231)

Dear Mr. Scott,

On behalf of Protect Our Water Jackson Hole (POWJH), we are pleased to submit this letter in response to the Wyoming Department of Environmental Quality's (WDEQ) June 12, 2024 public notice inviting comments on the above-referenced proposed Underground Injection Control (UIC) permit.

POWJH is a nonprofit organization dedicated to serving Teton County, WY as a powerful advocate for restoring and protecting the surface and groundwater in the Snake River Headwaters.

The Wilson Campus of Teton Science Schools (Campus), located at 2150 North Moose-Wilson Road, consists of six employee housing buildings and one office Building. The draft permit describes the wastewater as treated domestic sewage from five 2-bedroom duplex employee housing units, one 3-bedroom duplex employee housing unit, and one 1-bedroom office building, as well as one laundry shed with two washing machines. The draft permit also states that the injection facility consists of one mounded leachfield and is authorized to inject 4,950 gallons per day (gpd) maximum and 2,970 gpd average, primary treated domestic wastewater into the Snake River Alluvial aquifer. The leachfield is located in the SE $\frac{1}{4}$ SE $\frac{1}{4}$ of Section 14, Township 41 North, Range 117 West, of the 6th Principal Meridian, Teton County, Wyoming.

The groundwater along Snake River is classified as Class I according to Wyoming Water Quality Rules, Chapter 8. Groundwater of Class I shall not be degraded to make it unusable as a source of water for its intended use. The adjacent surface water, Fish Creek, is a Wyoming Class I Surface Water which is already impaired by *E. coli* bacteria and will soon also be impaired by nutrient pollution. Fish Creek, and the Snake River as it flows through Wilson, feed into Hoback River Canyon, which is one of the stretches designated by the Craig Thomas Snake Headwaters Legacy Act of 2008 as a recreational river. This, and other segments of the headwaters of the Snake River System in northwest Wyoming, is recognized as one of the cleanest sources of freshwater, the healthiest native trout fisheries, and the most intact rivers and streams in the lower 48 states. These rivers and streams provide unparalleled fishing, hunting, boating and other recreational activities for residents and millions of visitors, are national treasures, and generate millions of dollars for the Teton and Lincoln County economies. The designation under the Wild and Scenic Rivers Act (WSRA) signifies to all United States citizens the importance of maintaining the outstanding and remarkable qualities of the Snake River System.



POWJH has the following questions and concerns regarding the draft permit:

Why isn't this facility required to connect to a sewer line?

Teton County Small Wastewater Facility (SWF) Regulations (January 1, 2022) provide that a permit may be denied if a septic system is within 500 feet of a sewer line:

9-2-12 DENIAL OF PERMIT

a. The Sanitarian may deny a permit for any of the following reasons:

a.vi.. The proposed facility will serve a structure that is within five hundred lineal feet of an existing sewer collection system that will accept to serve that structure and necessary easements for the connection is legally obtainable.”

According to the Wilson Sewer District: “The Teton Science School (Mad Dog Campus) is located within the District, has an eight-inch diameter gravity sewer main located parallel to its western-most boundary, and a sewer service stub- out has been extended to the property line. We have reviewed the draft Class V Septic System Permit Modification and realize that it is a renewal of an existing permit. Our only comment is that we would like to see this facility connect to the Wilson sewer system.”

See attached letter from Wilson Sewer District to DEQ, dated June 27, 2013 (included in permit application).

We understand that this facility is regulated by DEQ as a UIC Class V large capacity system and not by Teton County as a SWF, but shouldn't the more protective Teton County standards apply?

Please update the heading of the FACT SHEET to note that the facility location is not 700 Coyote Canyon Road, as currently indicated, but 2150 North Moose-Wilson Road.

The FACT SHEET asks in section II.d. “Will waste disposal affect water wells in the area?” And answers by stating, “Public water supply wells will not be affected by waste disposal in the area.” The question addresses all water wells, not just public water supply wells. We suggest that the applicant should be asked again to address potential impacts to all water wells. With regard to PWS, what is the basis for this conclusion? Please explain the rationale for making this determination. Further, is the discharge consistent with well head protection, source water assessments, and source water protection plans that may be in effect?

Other comments/questions:

- Teton County adopted a Water Quality Management Plan in June, 2024. Is this permit in compliance with the terms and conditions contained in the WQMP?
- POWJH commends WDEQ for the numeric criteria for ammonia, nitrate, total phosphorus, and orthophosphate contained in this permit. Why are phosphorus and orthophosphate limits not present on all UIC permits?

- Semiannual monitoring for constituents listed in Table 4 is insufficient to understand the injectate quality in a way that protects Fish Creek's already degraded waters. We strongly suggest that WDEQ require more frequent monitoring of contaminants.
- The wastewater injected into the Alluvial aquifer from this leachfield comes from showers, toilets, washing machines, and sinks. Therefore, it is likely that this wastewater contains high levels of organics, microplastics, antibiotics, PFAS, and other undesirable compounds that threaten both surface- and groundwater uses. We strongly suggest that WDEQ establish and require monitoring requirements for these contaminants.
- Without a map of the campus and facility, it is difficult for the public to understand how these systems work and whether or not the point of compliance is placed in a location where monitoring results would be truly representative of the injectate as it enters the groundwater. We strongly recommend including this visual aid with future permits.
- Annual visual inspections of sludge depth in the tank are inadequate to account for occasional system misuse or a large increase in system use. POWJH strongly suggests that WDEQ requires more regular (monthly) inspections that are based on a quantitative measure rather than a visual assessment.

POWJH understands that TSS would prefer to be hooked into our valley's regional sewer system, but is currently unable to do so due to high connection costs. In lieu of this, we commend both TSS and the WDEQ for taking steps to ensure that the injectate entering the Alluvial aquifer (in an area recognized for outstanding water quality and already experiencing water quality issues) is as clean as possible.

We appreciate the opportunity to provide comments on UIC Class V 5E3 Permit No. 2023-231 and we look forward to WDEQ's response to our specific questions and comments.

Sincerely,

Dan Heilig

Dan Heilig
Interim Executive Director



Matt Bambach
Water Resources Program Manager