

Comments on the Draft 2019 SWMMWW		
Draft 2019 SWMMWW Section (select from drop down)	Comment	Comment Made By
S453 BMPs for Formation of a Pollution Prevention Team	Eliminate bullet that PP team members be on site on a daily basis. Consider "at least one member of the team should be on site daily." Allow flexibility for environmental managers covering multiple sites.	The Northwest Seaport Alliance
S455 BMPs for Spill Prevention and Cleanup	Under "Spill Cleanup and Proper Disposal of Material" please consider adding the following to the first bullet: "If it is safe to do so."	The Northwest Seaport Alliance
S457 BMPs for Inspections	Bullet 4 does not make sense, recommend eliminating. Rework bullet 6 to say something similar to, "Note whether unpermitted non-stormwater discharges to storm drains or receiving waters such a process wastewater and vehicle / equipment washwater are occurring. If found, eliminate these discharges or obtain a permit for them."	The Northwest Seaport Alliance
S431 BMPs for Washing and Steam Cleaning Vehicles / Equipment / Building Structures	There is a typo in the "Conduct outside washing operations features section: 8th bullet "Properly"	The Northwest Seaport Alliance
S406 BMPs for Deicing and Anti-Icing Operations for Streets / Highways	The Maintenance Operations bullets do not appear to match this BMP.	The Northwest Seaport Alliance
S406 BMPs for Deicing and Anti-Icing Operations for Streets / Highways	Under Recommended Additional BMPs, the fourth bullet does not appear relevant here.	The Northwest Seaport Alliance
S415 BMPs for Maintenance of Public and Private Utility Corridors and Facilities	Under Pollutant Control Approach: Consider rewording, "Implement a spill control plan for utility corridors and facilities to include control of ..."	The Northwest Seaport Alliance
S416 BMPs for Maintenance of Roadside Ditches	Given proposed language in the ISGP about testing water exiting infiltration systems, consider how this BMP intersects with the ISGP language so as to not create a conflict or disincentive for green infrastructure.	The Northwest Seaport Alliance
S424 BMPs for Roof / Building Drains at Manufacturing and Commercial Buildings	In the "Applicable Treatment BMPs" section, the second sentence in the first paragraph, "than" should be "that". The last sentence should probably read, "A possible treatment method for meeting more stringent local jurisdiction requirements could include Cytosan Enhanced sand filtration among other technologies." It does not seem appropriate for Ecology to endorse a proprietary solution.	The Northwest Seaport Alliance
S446 BMPs for Well, Utility, Directional and Geotechnical Drilling	In the description, after "drilling activities can expose soil and contaminated soil", add "Contaminated groundwater can also be encountered." On bullet four, delete "for horizontal directional drilling" as vertical drilling can generate drilling fluids as well. Add another bullet stating that utility locates should be conducted prior to drilling.	The Northwest Seaport Alliance
S451 BMPs for Building, Repair, Remodeling, Painting, and Construction	Bullet 4: Suggest replace scofflaws with vandals or similar word. A light read of this BMP suggests that no materials may ever sit on the ground without a tarp or bucket or cloth between the material and the ground. On many construction sites this is not feasible. Suggest reworking BMP to require ground covers for items that could generate pollution on contact with rain water.	The Northwest Seaport Alliance
I-2.2 AKART	It is not clear whether AKART only applies to underground injection wells or also applies to other activities related to the permits. Request clarification AKART applies broadly and how.	The Northwest Seaport Alliance
S452 BMPs for Goose Waste	This is not a useful BMP, those sites subject to the narrative standard for fecal coliform are already doing many of these items. Please consider eliminating.	The Northwest Seaport Alliance