

Comments on the Draft 2019 SWMMWW		
Draft 2019 SWMMWW Section (select from drop down)	Comment	Comment Made By
V-10.3 Approval Process for Manufactured Treatment Devices	Pretreatment GULD goal is self-conflicting. The text of the pretreatment performance goal assigns particle size requirements to effluent TSS goals. This is geared toward lab analysis of systems and is generally not possible in field evaluations, upon which the TAPE GULD depends. The following table does not set these particle size requirements. The text description should be revised to match the table.	
V-10.3 Approval Process for Manufactured Treatment Devices	TAPE approval process establishes strong requirements for stormwater treatment, but no mention is given to maintenance requirements or functional longevity. Guidance should be provided which prioritizes the use of manufactured treatment devices according to the quality of verified maintenance longevity data and consistent lifecycle costs. TAPE is very good at establishing and testing system performance; however, WA water quality goals are not served if those systems that are granted approval require unreasonably frequent maintenance to continue performing as tested.	