

| Comments on the Draft 2019 SWMMWW | | |
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| Draft 2019 SWMMWW Section (select from drop down) | Comment | Comment Made By |
| S431 BMPs for Washing and Steam Cleaning Vehicles / Equipment / Building Structures | It would be helpful to have a clear and concise BMP focused on the compliant commercial pressure washing of sidewalks, parking lots, dumpster enclosures, driveways/drive-thru, used cooking oil container areas, and roof related washing and cleaning activities. There needs to be more regional consistency and enforcement of applicable state level regulations. Relying on variable local stormwater requirements leads to different interpretations by mobile businesses that may or may not try to meet compliance expectations. If dirt build up is the only pollutant on a sidewalk, what is an acceptable level of turbidity allowed downsystem of a silt sock bmp? Should it be considered a violation at 25 NTU, 50, or 250? Washwater from polluted surfaces mentioned previously should all be clearly classified as process wastewater and strickly prohibited from discharging to stormwater conveyances. Unless Redmond is unique, this message is not necessarily being received by pressure washing businesses. | Scott McQuary |
| S434 BMPs for Dock Washing | Bird feces isn't mentioned specifically. Dry cleaning methods obviously would be preferred and since this is commonly what is being cleaned it would make sense to provide guidance. | Scott McQuary |
| S441 BMPs Potable Water Line Flushing, Water Tank Maintenance, and Hydrant Testing | Most commercial buildings (and new residential homes as well) have fire suppression systems that contain water that gets stagnant and very rusty over time. Some systems might even contain corrosion inhibiting or antifreeze chemicals. This systems require regular inspection and repair which require draining them. Consider adding guidance on draining these systems someplace other than stormwater conveyances. | Scott McQuary |
| S441 BMPs Potable Water Line Flushing, Water Tank Maintenance, and Hydrant Testing | Newly constructed fire suppression systems in large buildings require initial "confidence testing" that entails maxing out the system flow for a short period of time. This results in a very high volume of municipal water discharging to storm and can mobilize different pollutants. Consider including this activity in this BMP or in Volume II. | Scott McQuary |
| S415 BMPs for Maintenance of Public and Private Utility Corridors and Facilities | This BMP should provide clearer guidance and procedures for dewatering utility vaults, manholes, or substructures related to the many varied utilities that operate, inspect, and perform repairs and often need to pump them out to do so. There should be regionally consistent guidance on what pollutants might be present that would require additional assessment or alternate dewatering disposal requirements. | Scott McQuary |
| S409 BMPs for Fueling At Dedicated Stations | S409 specifically mentions the BMP are "for New or Substantially Remodeled" stations, are there separate BMPs for stations that do not meet that criteria? | Scott McQuary |
| S433 BMPs for Pools, Spas, Hot Tubs, and Fountains | Systems that generate chlorine from added sodium chloride (3000-4000ppm?) are now common. As it may be difficult to effectively remove sodium from pool water before discharging to storm it would help to clarify in the BMP that this effluent is prohibited, unless that sodium level is below what would concern Ecology. | Scott McQuary |