Comments on the Draft 2019 SWMMWW		
Draft 2019 SWMMWW Section (select from drop down)	Comment	Comment Made By
BMP C121: Mulching	Conditions of Use. second set of bullets. 2nd bullet "fibers made of wood. recvcled cellulose. hemp. or kenaf" "Recvcled cellulose"	WSDOT
	allows for the use recycled paper, and pigment and dye in recycled paper has been identified as an inadvertent source of PCBs.	
	Recommend removing "recycled cellulose" as a material option	
BMP C121: Mulching	Conditions of Use, final paragraph, re: chemical-based tackifier. We have concerns over the apparent inconsistencies between the	WSDOT
	more stringent expectations for BMP 126 Polyacrylamide (a chemical-based tackifier) in this document, and the lack of requirements	
	for chemical-based tackifiers present in hydromulch. Recommend either prohibiting the use of chemical-based tackifiers in	
	hydromulch, or establishing a set of testing requirements and thresholds for fully mixed hydromulch products that contain chemical	
	tackifiers that may be harmful to aquatic systems and the environment as a whole.	
BMP C121: Mulching	Design and Installation Specifications: final paragraph re: application within OHWM. Hydromulch may contain harmful chemicals that	wsdot
	should not be permitted to enter surface water. Additionally, many hydromulches are pre-mixed with a tackifier, such as	
	polyacrylamide, which is prohibited from coming into contact with surface water, as described above (see also BMP 126	
	Polyacrylamide). Recommend prohibiting the use of hydromulch within the OHWM to prevent contact with surface waters.	
BMP C121: Mulching	Due to the documented environmental risks associated with these products, we recommend that ECY create a separate, stand-alone	WSDOT
	BMP for hydromulches separate from this general mulching BMP, that include a set of laboratory testing requirements to prevent	
	discharge of harmful chemicals into surface water and the environment. In addition, we recommend Ecology require hydromulch to	
	be free of chemical pigments and dye, which has been identified as is a potential source of inadvertent PCBs.	
BMP C122: Nets and Blankets	Language re: biodegradable or photodegradable netting – there is no industry-wide accepted definition for biodegradable erosion	<sup>t:</sup> wsdot
	control materials, and the test methods that are available are based on very limited and specific laboratory conditions that mimic	
	landfill conditions, which is not representative of real-world degradation on the soil surface. So-called "biodegradable" and	
	"photodegradable" netting materials are often found to either show little to no signs of degradation, or break down into smaller	
	"microplastics". In an effort to address this issue, WSDOT has recently updated our Standard Specifications to specify what we expect:	
	Refer to Standard Specification 9-14.5(2) " natural plant fibers unaltered by synthetic materials". Furthermore, because the NPDES	
	CSWGP allows "biodegradable" BMPs to be left in place after CSWGP termination, defining "biodegradable" is critical to ensure	
	synthetic, non-degrading netting and microplastics are prohibited from being left behind post-construction. Recommend defining	
	what is meant by biodegradable netting (i.e., natural plant fibers unaltered by synthetic materials) and disallowing the use of	
	photodegradable netting material.	
BMP C122: Nets and Blankets	Design and Installation Specifications, 1st bullet on page, reference to Division 8-01.3(3) and Division 9-14.5(2) to WSDOT's Standard	WSDOT
	Specifications – Recommend simplifying the references to "8-01" and "9-14", respectively, as the Standard Specifications are	
	routinely updated and may be re-ordered/numbered. Making a reference to Division 8-01 and 9-14 as a whole would ensure the	
	content may still be found, even if the Specifications have been renumbered.	
BMP C122: Nets and Blankets	Design and Installation Specifications, 1st bullet on page, last item: WSDOT's Training Manual for the Construction Site Erosion and	
	Sediment Control Certification Course does not exist. Recommend removing reference to WSDOT's Training Manual for the	WSDOT
	Construction Site Erosion and Sediment Control Certification Course.	
BMP C140: Dust Control	Regarding the use of dust suppressants and chemical dust palliatives. Chemical dust palliatives and suppressants may contain	
	chemicals that are harmful to aquatic life and the environment. Recommend re-evaluating the use of chemical-based dust	
	palliatives/suppressants in proximity to sensitive areas and surface water (i.e., preventing its use in areas that drain directly to surface	e WSDOT d
	waters and sensitive areas). Also recommend considering the establishment of testing requirements and thresholds for chemicals and	
	compounds that may be harmful to aquatic systems and the environment as a whole.	
BMP C151: Concrete Handling	Design and Installation Specifications, Bullet #5: "Do not allow washdown from areas, such as concrete aggregate driveways, to drain	WSDOT
	directly to natural or constructed stormwater conveyances." Recommend clearly defining "washdown" and the intent of this	
	requirement. Also recommend defining what "directly" means in this language.	
BMP C235: Wattles	Regarding wattle encasement netting material when used as a biodegradable BMP (also, see comment for "biodegradable erosion	
	control blanket). Recommending requiring that any wattles left on site following construction (i.e., "biodegradable netting material")	WSDOT
	be comprised of natural plant fibers unaltered by synthetic materials, and disallowing the use of photodegradable netting material.	
BMP C252: Treating and Disposing of High pH Water	Causes of High pH, 2nd paragraph: "Calcium hardness can contribute to high pH values and cause toxicity that is associated with high	
	pH conditions. A high level of calcium hardness in waters of the state is not allowed. Ground water standard for calcium and other	WSDOT
	dissolved solids in Washington State is less than 500 mg/l." Recommend clearly defining what constitutes a high level of calcium	
	hardness for surface water discharge and infiltration, and associated testing expectations.	l
S454 BMPs for Preventive Maintenance / Good Housekeeping	5th bullet: Recommend replacing "vauum sweepers" with "mechanical sweepers" and using just "as needed" instead of "quarterly or	WSDOT
	more frequently as needed."	

S406 BMPs for Deicing and Anti-Icing Operations for Streets / Highways

Regarding the nine bullets under "Maintenance and Operations" - These items do not appear to be in the correct location.

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