

Draft 2019 SWMMWW comments for consideration:

- Reference page 11 first bullet at top of page, recommend for consistency to add, *discharge leaving the site should not exceed 10% of the received water flow and an energy dissipation pad should be consider for erosion protection.*
- Reference page 117 element 9.d, recommend protection to groundwater be added as follow excerpt, *prevents discharge to surface/ground water, or to the sanitary...The high ground water table shall be at least 3 feet from the ground surface prior to proposed infiltration*, since the manual is not a permit.
- Reference page 118 element 9.J, recommend the last sentence include a reference to the human caused variation of .2 or .5 for pH neutralization in compliance with the surface water quality standards, since the manual is not a permit.
- Reference page 296, section 11-2.4 second paragraph, recommend it be identified when a SWPPP is required. Past requirement identified a minimum threshold project be at least one acre of disturbance and have potential for a construction stormwater discharge to surface waters of the state including wetlands. Protection of groundwater is good to see too, but the construction related elements of concern should be identified other than turbidity like pH and hydrocarbons etc. It would be great to see a depth of soil filtration allowed between the surface and ground water, like if the high ground water table is less than 3 feet from the existing surface ground elevation a SWPPP would be required on projects 1 acre and greater.
- Reference page 303 towards bottom of page regarding ESC BMPs, recommend a bullet be added that the location of perimeter BMP strategies be included to ensure construction material stay onsite.
- Reference page 304 second to last bullet, recommend a typical sketch to where a monitoring location(s) are located on a site plan would be helpful.
- Reference page 313 BMP C102 Buffer Zones, it would be helpful to relate the buffer zone width to a tool like Table 11-3.12 for consistency to what is acceptable.
- Reference page 316 fourth paragraph, recommend the last sentence identify “...discharge to surface and/or ground water of the State is prohibited”.
- Reference page 318 first and second bullet, the location of pavement should be described. At times there is pavement within the project limits that is used for construction vehicles only and an allowance to identify that construction access pavement does not require sweeping unless a construction stabilization access area does not follow prior to entering and accessing the public traveling roadway.
- Reference page 318 fourth from the bottom bullet, recommend non-high efficiency mechanical sweeper be prohibited due to the fugitive dust created and poor sweeping performance.
- Reference page 320 section BMP C106 fourth bullet, recommend process water discharge to high ground water table areas less than 3 feet from the native ground surface not be allowed either.
- Reference page 335 second bullet, recommend the use of synthetic blankets that utilize plastic not be allowed due to animals can be trapped in that type of materials in the short term till the plastic break down.
- Reference page 342 first bullet under maintenance standards, recommend the first word “Tom” be replaced with “Torn”.
- Reference page 351, it may be worth noting runoff the Pam treated areas neutralized the treatment abilities of chitosan flocculent systems (BMP C250) and should be reconsidered for use if a chitosan system is planned on a given project.