

NPDES Draft Street Sweeping Requirements

Draft Preliminary Permit Section	Comment
General	<ul style="list-style-type: none"> It's confusing about how the third bullet interacts with the first. Might make more sense to include the third bullet into the first. That 90% of MS4 will need to be swept annually and high priority areas be swept twice more. Is this the intent?
General	<ul style="list-style-type: none"> Some street sweepers are minimally effective in removing pollutants. Will ecology require a specific technology or minimum level of effectiveness in removing pollutants?
Accessible curb and gutter streets – permittees may need to implement parking restrictions or other effective methods to optimize pollutant removal	<ul style="list-style-type: none"> This will require a different approach from how we currently work. There will be a lot of logistics to figure out. We would likely begin with community outreach. Research findings don't favor posting signs or ticketing. There will be a big learning curve for municipalities and the community.
Commercial and industrial land use areas.	<ul style="list-style-type: none"> This section is unclear and can benefit from further clarification. It could be interpreted to mean areas outside the R/W or the permittees jurisdiction if publicly owned. For example DES owned infrastructure in the city. <p>Is it correct to assume "areas" would be interpreted as public roadways (Rights of way) and City owned parking lots?</p>
MS4 basins that discharge to surface receiving waters that support salmonids.	<ul style="list-style-type: none"> This should coordinate well with the basin characterization requirement.
Permittees must sweep at least once prior to October 1 each year and two additional times a year as determined by the Permittee to provide additional water quality benefit.	<ul style="list-style-type: none"> This is not limited to "discharges to receiving waters," but appears to include the entire MS4 drainage area? Prior to Oct 1? This may be difficult, and it also needs clarification. Does this bullet refer directly to the first bullet (Applying street sweeping program to MS4 drainage areas that directly discharge to surface receiving waters)? Does 3x/year apply to just the high priority areas? It could be difficult for some Phase II municipalities to reach these goals without time to build up their budgets for the

	<p>program. However, 3 times/year for curbed streets would be good since the typical curb and gutter design promotes pollutant concentration in sediment and causes high transport rates. It would be more reasonable to sweep other streets with ditch drainage or no stormwater conveyance 1 to 2 times/year. Sweeping curbed streets before the rainy season (July – Sept) would be most effective.</p>
<p>Permittees shall annually sweep, on average, 90% of the MS4 drainage area that directly discharges to surface receiving waters.</p>	<ul style="list-style-type: none"> • This bullet seems to conflict with the first bullet above, which seems to focus/require sweeping of the high priority areas.
<p>Permittee shall follow equipment design performance specifications to ensure that street sweeping equipment is operated at the proper design speed with appropriate verification, and that it is properly maintained</p>	<ul style="list-style-type: none"> • How would this be proven/tracked? By whose standard is equipment "maintained?" <p>The city completes some of this now by extracting Zonar data for sweep speed. Fleet follows the manufacturer's guidelines for maintenance.</p>
	<ul style="list-style-type: none"> •

Stormwater Manual

Manual Section	Comment
<p>BMP T7.30 Bioretention Pg 10 & 11 of 51 Infeasibility criteria</p>	<p>Need to ensure that the first bullet include stronger language that this may only be used for pre-existing (pre-designed) site specific conditions.</p> <p>Need clarification or definition of what “site-specific conditions” means. Are these site-specific conditions prior to the design engineer siting a structure on a plat, or are these site-specific conditions identified following engineering design of the plat?</p> <p>There is a need for clarification that this criterion may only be used when there are site-specific conditions or limitations based on existing land conditions (pre-design). Not for the proposed design. Otherwise there have been cases where licensed professionals state the layout of the new building is a site constraint for implementation of the LID BMP.</p>

