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9 August 2019

Romell Nandi
US EPA
Washington, DC

Dear Romell Nandi,

Thank you for giving the Stormwater Equipment Manufacturers Association (SWEMA) the opportunity to comment on Chapter 3 of EPA's upcoming MS4 Permit Writers' Trash Compendium. SWEMA supports EPA's effort to promote water quality and keep trash out of our nation's waterways. That said, SWEMA has the following general comments on Chapter 3 of the Compendium:

- More clearly define trash load. The total trash load is typically comprised of floatables, heavier trash that settles out, and neutrally buoyant debris. Some BMPs are effective at removing all forms of trash, and other are not. The basic capabilities of each type of BMP should be clarified.
- Consider developing a unit of comparison so that the Permit Writer can reasonably compare the overall effectiveness of a \$230 fixed inlet screen to a \$60,000 baffle box.
- Adopt or develop a standard protocol for consistently and objectively testing the effectiveness of trash BMPs and reference it in the Compendium. SWEMA is currently working to develop such a protocol and is prepared to assist EPA as needed.
- The HDS fact sheet, for which there is a link provided in the document, is grossly outdated and should be removed or updated.

I hope you find these suggestions constructive. If more detail or assistance in generating a response to any of these items is needed, please do not hesitate to contact us.

Sincerely,

A handwritten signature in blue ink, appearing to read "Jay Holtz".

Jay Holtz, PE
SWEMA Government and Regulatory Committee Chair

Derek Berg

Derek Berg
SWEMA President