

COMMENT	ACTION TAKEN	RESPONSE, IF ANY
<p>According the 5th Edition of the GSWCC Manual 12 inch diameter compost filter socks have been approved for Type B sediment control and check dam applications – not 18 inch diameter as currently listed in the DRAFT Equivalent BMP List. This appears to be an error in copying from the 5th to the new 6th/2016 Edition. Also, the code should be Cd-Fs in the Equivalent BMP List, according to the Draft 2016 Manual.</p> <p>See reference here from GSWCC website: http://gaswcc.georgia.gov/sites/gaswcc.georgia.gov/files/imported/SWCC/Files/GSWCC_Co_mpost_Filter_Sock_Specs.pdf</p>	<p>Changed code to Cd-Fs. Updated 2016 Manual to include 2-ft post spacing.</p>	<p>18" is the approved size per GSWCC and DOT approval; and 2-ft spacing on posts is the approved spacing.</p>
<p>Presently when engineers design plans and county's write development specifications, generic statements are used. The statement in reference contains (as per GADOT-QPL). Now that GSWCC has assumed the roll for primary approval of E&S Products, this statement should be revised to avoid confusion. Many products needed for the private sector are never used on linear projects and cain't get approved for the GADOT qualified products list. Please revise this statement by a directive to the engineering community to reflect (as approved by GSWCC).</p> <p>In the past, Silt Saver's BRSF silt fence, the only silt fence on GSWCC qualified products list, could not be used in Ga because we could not get it approved by GADOT. Plans stated (as per GADOT qualified products list).</p>	<p>No action</p>	<p>Refer to Appedix A-2 and Equivalent BMP List</p>
<p>2. In the SD-2 section Inlet Protection our product is listed only as Silt Saver. This should be corrected by using (Silt Saver Frame and Filter).</p>	<p>Added Silt Saver Frame and Filter</p>	

<p>3.Please state how products are evaluated. Most products on the present GADOT -QPL for E&S Products are there due to evolution, where no test results are available for comparison or design. How do engineers design an E&S plan with expected results without knowing ,at a minimum, the results of the products used in the E&S Plan.</p> <p>How can offenders be prosecuted when they are not allowed to know what results are expected of the products that they are allowed to use.</p> <p>GADOT has a list of products grandfathered on the old QPL.They didn't get there because they proved their ability to stop sediment.They are there because they met the minimum material specification written 25 years ago. New technology that allows us to build better performing products,producing less soil loss from job sites ,do not get approved if they don't meet the minimum specs, although producing better results.</p> <p>How can you encourage innovation when all that is required is the minimum?</p> <p>Material Specifications should only be used for approval of products after being tested for and meeting the performance value acceptable for the practice.</p>	<p>No action</p>	<p>See Appendix A-2</p>
<p>Retrofit/Skimmer</p> <p>Regarding the Retrofit (Rt), we have had discussions in our office about using them in conjunction with the skimmer, in the event that the skimmer gets clogged or during an heavy rain event. It seems most of the municipalities do not allow to have both the Rt and the Sk shown at the same time on the plans. Perhaps a note in either the Rt or Sk section stating that one may be used, but not both.</p>	<p>No action</p>	<p>Refer to NPDES Permit</p>
<p>Skimmer Connection</p> <p>We would also like to see some guidance added to the Sk section for how to attach to Outlet Control Structures, as oftentimes we build the final pond and use it for sediment storage. Namely, do we call out to plug or not core the Channel Protection Orifice until final stabilization, and how do we protect the weir? We typically have been showing the Skimmer connection to the Water Quality Orifice. The concern with the weir is that if the water level rises above the weir then some of the water is being discharged below the surface. We have created some details that we might be able to share with you regarding how we connect to the outlet control structure..</p>	<p>No action</p>	<p>See manufacturer's recommendations</p>

<p>When Not to Use a Skimmer</p> <p>We have also heard the following from local municipalities:</p> <p>“In recent discussions with the GASWCC and the Fulton Co. District Supervisors, we learned that they will now allow soil types with a high percentage of fines as a reasonable rationale. This has not been fully cleared with the EPD or EPA, but does have the backing of the GASWCC. If you have other projects with the same or similar soil types where skimmers have been used and routinely failed turbidity tests, then that would be good backup data.”</p> <p>Having this information included in the Sk section may be useful to provide some guidance, <u>pending proper approval.</u></p>	<p>No action</p>	<p>Skimmer use is based on the NPDES Permit and the design professional.</p>
<p>My comment would be to add bookmarks to the document similar to what is below for ease of navigation.</p>	<p>No action</p>	
<p>Where is it gonna be and time?</p>	<p>No action</p>	<p>Equivalent BMP List was posted online for public comment.</p>
<p>Wonder why style Beltech 1935 was only approved for NS when it performed so admirably in the independent "P" factor test.</p> <p>why not "S" as well.</p>	<p>No action</p>	<p>Performance testing was not used. Please see Appendix A-2.</p>
<p>Please place the Silt-Saver Belted Silt Retention Fence {system} in the Manual as recommended by EDP and signed off by GSWCC Executive Director, Brent L. Dykes. It was tested extensively by The University of Georgia and approved as a practice to be placed in the Manual under SD-1Section. Please refer to it throughout the Manual as BSRF C-System. At the time of approval the term SDI-C-ALT was used. Please see the attached letters for details.</p>	<p>No action</p>	<p>Sediment Barrier is categorized as S. and N.S.</p>

<p>With the restructuring of the Green Book and correlation to the GaDOT Approved Products List and their specs, it appears that the Tackifier, Flocculant and Polyacrylamide specs and APL will NOT match and therefore some products will not be on one or the other approved products list that are currently approved.</p> <p>Specifically, out tackifier that is currently on the Georgia APL under the Polyacrylamide Spec, but does not appear on the revised GASW accepted products under Tackifiers. The new GASW Green Book was written to include ALL types of tackifiers, not just organic tackifiers. GaDOT's Tackifier Spec ONLY included organic tackifiers and non-organic tackifiers fell under the Polyacrylamide Spec. GASW should therefore combine BOTH of these GaDOT Specs into one and include BOTH lists under the new Tackifier Spec within GASW.</p>	<p>No action taken</p>	<p>Confirmed Product listing with DOT. DOT does not recognize product as a stand-alone tacifier.</p>
<p>GaDOT also does not currently have a Flocculant Spec, but are using the Polyacrylamide Spec for these which should NOT only include Polyacrylamide, but other flocculants like GASW's new spec. How is that going to be dealt with?</p>	<p>No action taken</p>	<p>There is no equivalent list for flocculants at this time.</p>