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To: [ECY RE WW SW Manual Comments](#)
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Subject: SWMMWW - Public Comment: Process Water Comments
Date: Friday, February 03, 2012 4:12:49 PM

The purpose of this email is to provide public comment on the SWMMWW regarding some of the confusion surrounding “process water” and high pH construction stormwater. Volume II of the SWMMWW attempts to address this issue in the following sections:

- Element #9: Control Pollutants: pg. 3-23
 - “...discharge wheel wash or tire bath wastewater to a separate on-site treatment system that prevents discharge to surface water, such as closed-loop recirculation or upland application, or to the sanitary sewer...”
 - “Use BMPs to prevent contamination of stormwater runoff by pH modifying sources. The sources for this contamination include, but are not limited to: bulk cement, cement kiln dust, fly ash, new concrete washing and curing waters, waste streams generated from concrete grinding and sawing, exposed aggregate processes, dewatering concrete vaults, concrete pumping and mixer washout waters.”
 - “Adjust the pH of stormwater if necessary to prevent discharge violations of the water quality standards.”
 - “Obtain written approval from Ecology before using chemical treatment other than CO₂ or dry ice to adjust pH.”

- BMP C151: Concrete Handling:

- BMP C152: Sawcutting and Surfacing Pollution Prevention

- BMP C252: High pH Neutralization using CO₂

- BMP C253: pH Control for High pH Water

Comment #1: Definition of Process Water vs. High pH Stormwater: This seems to be different for each project and each Ecology inspector. The problem is amplified by the interpretation of the local municipal inspectors. For instance, many inspectors have defined stormwater runoff that has become in contact with sources of high pH contamination as “process water” that cannot be treated on-site and discharged to surface waters.

Comment #2: If water quality standards are met and appropriate treatment controls (BMP C250, 251 & 252) have been implemented, can “process water” be treated to surface water, especially if disposal options outlined in BMP C253 are not available and/or feasible? Can a written Technical Memorandum or Treatment Plan be submitted along with a Request for Chemical Treatment Form to obtain approval for treatment and discharge to surface waters in this situation?

Thank you for your time and consideration.