



July 7, 2013

Rebecca Stack
Watershed Protection Division DDOE
1200 First Street, NE, 5th Floor
Washington DC 20002

RE: Comments to Second Proposed Stormwater Guidebook revisions

KriStar Enterprises, Inc. offers the following comments in regards to the Second Proposed Stormwater Guidebook Revisions.

In Appendix T, there are references to the VTAP as seen below:

T.5 Nutrient Reduction Performance

When a MTD is seeking to comply with the nutrient reduction provisions of the Chesapeake Bay Total Maximum Daily Load, the nutrient load reduction performance must be verified through the Virginia Technology Acceptance Protocol (VTAP) implemented by the Virginia Department of Environmental Quality and can be found at the Virginia BMP Clearinghouse Website: <http://vwrrc.vt.edu/SWC/EvalCert.html>.

As the VTAP is a new process which has not been finalized, and is not a proven process, we feel that it is premature to include references to the VTAP process in the new Stormwater Guidebook. KriStar suggests that this section be removed, and all references to VTAP be removed until the process is finalized and proven scientific data has validated the process.

For Nutrient Reduction Performance, KriStar feels that the TAPE process is complete and proven process for evaluating BMP performance. KriStar suggests that reciprocity for products evaluated and approved by the WADOE, which uses the TAPE process, be granted for nutrient reduction in DDOE jurisdiction.

KriStar appreciates the opportunity to provide comments on the new Stormwater Guidebook and I look forward to future interaction with DDOE in developing a guidebook which provides clear guidance on the use of proprietary BMP's based on scientific evaluation of performance.

Best Regards,

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