

Chapter 1. Manual Introduction

Purpose: Introduce the manual.

Ideas for Content:	Proposed Action:	TAC Comments:	Decision:
Original Ideas for Content			
Manual purpose and audience	Include in Chapter 1.		Include in Chapter 1.
Background (why the manual was developed)	Include in Chapter 1.		Include in Chapter 1.
Relevant MS4 Permit requirements	Include in Chapter 1.		Include in Chapter 1.
How to use the manual	Include in Chapter 1.		Include in Chapter 1.
Manual organization	Include in Chapter 1.		Include in Chapter 1.
Additional Ideas for Content (Survey)			
N/A			

Chapter 2. Street Sweeping Water Quality Benefits

Purpose: Summarize the impacts that street waste can have on water quality and the benefits street sweeping can provide to reduce those impacts.

Ideas for Content:	Proposed Action:	TAC Comments:	Decision:
Original Ideas for Content			
Literature Synthesis: What is known and unknown related to pollutants and street sweeping. <ul style="list-style-type: none"> • Sources of street waste • Physiochemical characteristics • Removal efficiency • Fate and transport 	Include in Chapter 2.	<ul style="list-style-type: none"> • Include information on efficiency during rain/leaf season. • When describing pollutant removal efficiency, make sure to clarify this is not the same as the change in runoff water quality. Potentially include conceptual model diagram. • Consider pollutant removal efficiency for pollutants that end up in air/land/water (whole package – not just stormwater). • Electric street sweepers – Include in Chapter 4. • Recommend putting the literature synthesis (supporting information) in an appendix. 	Include in Chapter 2.
Guidance for applying information to develop program goals	Include in Chapter 2.	<ul style="list-style-type: none"> • Move topic on applying the data to Chapter 3 (to set priorities) and Chapter 5 (to optimize program effectiveness). 	Move topic on applying the data to Chapter 3 (to set priorities) and Chapter 5 (to optimize program effectiveness).
Additional benefits for street sweeping beyond meeting MS4 Permit requirements	Include in Chapter 2.	<ul style="list-style-type: none"> • Include all the benefits of street sweeping, water quality and otherwise. Introduce this content 	Include in Chapter 2.

		prior to going into the guidance for applying the information to meet program objectives.	
Additional Ideas for Content (Survey)			
Adaptive management: We need more 6PPD fate & transport research to know if street sweeping is effective. Allowing the particles to sit in the sun during dry periods may ozonate the 6PPD out, sweeping may consolidate 6PPD, fine vs. course sweepers.	Addressed in Chapter 2. Could also be included in Research Gaps and Recommendations document.	<ul style="list-style-type: none"> Address these types of questions in this Chapter’s literature synthesis. 	Include a short description of 6PPD research and findings in the literature synthesis section of Chapter 2. This topic will also be included in the Research Gaps and Recommendations document.
The pollution generated by increased street sweeping offsets is at odds with the water quality benefits of increased street sweeping.	Potentially include in Chapter 2. TAC – please comment.	<ul style="list-style-type: none"> Street sweeping reduces the amount of sediment entering catch basins. It’s not clear what the commenter means by “street sweeping offsets”. Is the question here whether increased street sweeping contributes more pollution than it removes? If so, perhaps this is something the literature synthesis might reveal (if such information even exists). The water quality benefits outweigh the pollution generated. The pollution generated may be negligible from some sweepers (electric). 	Exclude from the manual. This topic is beyond the scope and intent of this manual.

		<ul style="list-style-type: none"> • Consider at least mentioning in the manual. 	
Effectiveness of sweeping curb vs non-curb roads.	<p>Include in Chapter 2 (24 selections as part of Survey Question 5). This topic could be included in Chapter 4 or Chapter 9 instead.</p> <p>TAC – please comment.</p>	<ul style="list-style-type: none"> • This is essentially describing urban vs rural and the different street sweeping needs for each area. • Things to consider: Seasons and equipment necessary, conditions of roadways (how well can they sustain sweeping of different types), weight bearing capacity of roadways. • This is something the literature synthesis might reveal. If that proves to be the case, those finding can inform guidance in the other chapters (e.g., Chapters 3 & 5). • Chapter 9 may be a better place for this topic. • Potential topic for a future SAM study. Grade changes, road crown, and other factors also affect this. 	<p>Move this topic to the literature synthesis section of Chapter 5. The TAC comments will help guide the literature synthesis about this topic.</p>
Additional Ideas for Content (Stormwater Group Meetings)			
Additional benefits: include the benefits of general waste management, public safety, and traffic safety.	<p>Potentially include in Chapter 2. TAC – please comment.</p>	<ul style="list-style-type: none"> • Public health – consider the different types of roadways/quality in different economic areas. • Picking up leaves helps prevent blocked structures. • Recommend this chapter discuss all the benefits of street sweeping. Public and traffic safety would be examples of those. 	<p>Include in Chapter 2.</p>

		<ul style="list-style-type: none">• Also include air pollution reduction from dust and debris from construction sites.• Include in chapter.	
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Chapter 3. Identifying High Priority Street Sweeping Areas

Purpose: Provide guidance to assist Permittees in identifying their specific high priority areas for their street sweeping program using information from Chapter 2 and available jurisdictional information.

Ideas for Content:	Proposed Action:	TAC Comments:	Decision:
Original Ideas for Content			
Literature synthesis	Include in Chapter 3.	<ul style="list-style-type: none"> Recommend putting the literature synthesis (supporting information) in an appendix. 	Literature synthesis summary will be provided at the beginning of the chapter.
Guidance for identifying priority areas based on permit and jurisdictional priorities	Include in Chapter 3.		Include in Chapter 3.
Using data jurisdictions have available	Include in Chapter 3.	<ul style="list-style-type: none"> Revise to using data to inform setting priorities. 	Revise topic to using data to inform setting priorities.
Supplement data with literature	Include in Chapter 3.	<ul style="list-style-type: none"> Include guidance on how to use findings from literature reviews to inform setting priorities. 	Revise to using findings from literature reviews to inform setting priorities.
Guidance for collecting data to refine identifying priority areas	Include in Chapter 3.	<ul style="list-style-type: none"> Move to Chapter 6. 	Move all data collection topics to Chapter 6. Chapter 3 will describe how to use the data to refine identifying priority areas.
Additional Ideas for Content (Survey)			
Methods to assess and prioritize roads (beyond what is required in the Permit) based on variables (weight, bus/truck route, velocity, traffic density, start/stops).	Include in Chapter 3, part of Guidance for identifying priority areas (28 selections as part of Survey Question 5).		Move to Chapter 5.

Sweeping non-street locations (e.g., parking lots, pathways)	Exclude from manual (only 13 selections as part of Survey Question 5).	<ul style="list-style-type: none"> • Consider describing sweeping in areas that are within a jurisdiction’s MS4. For example, a campus of municipal buildings owned by the jurisdiction. • Draft Permit includes sweeping parking lots. This should be included. • Consider researching and including new technology for walkways and pathways. • Include topic on sweeping parking lots, but not pathways. At the very least, cover parking lot sweeping in Chapter 9. 	Include sweeping parking lots in Chapter 3. Exclude sweeping pathways.
Additional Ideas for Content (Stormwater Group Meetings)			
Prioritized areas beyond the MS4 Phase II Permit may include near shore areas and areas with TMDLs.	Include in Chapter 3.		Include in Chapter 3.
Other comments:		<ul style="list-style-type: none"> • Think about where, when, and how when designing street sweeping routes. Consider the time of day. 	Move to Chapter 5.

Chapter 4. Establishing and Improving New Street Sweeping Programs

Purpose: Provide guidance for starting new or improving existing programs, including guidance for defining program goals.

Ideas for Content:	Proposed Action:	TAC Comments:	Decision:
Original Ideas for Content			
Introduce street sweeping program elements	Include in Chapter 4.		Include in Chapter 4.
Right sizing street sweeping programs	Include in Chapter 4.		Include in Chapter 4.
Selecting equipment	Include in Chapter 4.		Include in Chapter 4.
Developing/selecting a defensible way to assess and measure program benefits	Include in Chapter 4.	<ul style="list-style-type: none"> • Include topic in Chapter 4 if it's presented in a way that helps create a framework for content covered in Chapter 6. 	Move to Chapter 5.
Guidance establishing/organizing multi-department collaborations that support street sweeping programs	Include in Chapter 4.		Include in Chapter 4.
Additional Ideas for Content (Survey)			
Street sweeper size/type vs cost tradeoff (i.e., a larger sweeper will make less dewatering/decant trips but will cost more to purchase and operate).	Exclude from manual (only 16 selections as part of Survey Question 5).	<ul style="list-style-type: none"> • Include short section in equipment selection section. Include guidance for selecting hopper size. • Seems like considerations for selecting equipment which is proposed for inclusion above. • Agree with recommendation to exclude. 	Include a short description in equipment selection section of Chapter 4.

<p>Interlocal agreements and community-based public/private partnerships.</p>	<p>Exclude from manual (only 10 selections as part of Survey Question 5).</p>	<ul style="list-style-type: none"> • Consider smaller jurisdictions that may not be able to afford a sweeper and local agreements may make more sense. • Public/private partnerships could also be utilized in underserved communities. Evolving opportunity worth mentioning. 	<p>Include a short section on interlocal agreements and public/private partnerships in Chapter 4. Focus section on smaller jurisdictions with less funds.</p>
<p>Parking policies and enforcement options.</p>	<p>Include in Chapter 4 (21 selections as part of Survey Question 5).</p>	<ul style="list-style-type: none"> • When you look into models, situations like parking that cause delays are a big issue. • Consider when is the best time to sweep (at night compared to during the day while people are working). • Parking enforcement is an equity issue. 	<p>Include in Chapter 4.</p>
<p>Street sweeping program staff training</p>	<p>Include in Chapter 4 or Chapter 8 (23 selections as part of Survey Question 5). TAC – please comment.</p>	<ul style="list-style-type: none"> • Include in Chapter 4. • Define who is responsible for the training and who will give it. Seems appropriate to include costs for training in 8 and content requirements in 4. 	<p>Include staff training in Chapter 4. Describe costs for training in Chapter 8.</p>
<p>Methods to effectively sweep areas that are too narrow for a full-size sweeper (e.g., protected bike lanes)</p>	<p>Exclude from manual (only 16 selections as part of Survey Question 5).</p>	<ul style="list-style-type: none"> • This is an issue in Seattle – adding bike lanes that cannot be swept. • Consider discussing how to incorporate bike lanes so they can still be swept. • Agree with recommendation to exclude. 	<p>Include in Chapter 4.</p>

<p>Overview of sweeping machines and sweeping methods/efficiencies (such as sweeping on a damp day is more effective to capture materials).</p>	<p>Already included in original content.</p>		<p>Include in Chapter 4.</p>
<p>Better understanding about allowing water to run off of sweeper in heavy rain season that happens to fall in the heaviest leaf season. Permittees are told we can't but not one sweeper company has a filter system built to allow this.</p>	<p>Potentially add to Chapter 4. TAC – please comment.</p>	<ul style="list-style-type: none"> • Include in Chapter – have conversation with Ecology. • This topic should be covered in the manual as it comes up a lot. However, it might be more appropriate to cover in the literature synthesis proposed for Chapter 2. • If the tech isn't there to do the work with the equipment on the market, then why is it a requirement? Would this meet criteria of a “conditionally allowable discharge”? 	<p>Move to Chapter 5.</p>
<p>Trained Staff (significant issue due to large amount of turnover since COVID), equipment & plans for dealing with equipment maintenance. These items are issues for existing programs.</p>	<p>Staff training and equipment are already included in the original content. Include equipment maintenance in Chapter 4.</p>	<ul style="list-style-type: none"> • Include in Chapter 4. 	<p>Include in Chapter 4.</p>
<p>How to structure the program. For example, should this be a collection of SOPs, a written report, or some other form? How should it be organized.</p>	<p>Include program organization in Chapter 4.</p>		<p>Include in Chapter 4.</p>

Handling non-standard curb lines.	Include in Chapter 4.	<ul style="list-style-type: none"> • Example: bulb-outs • Reach out to the City of Lacey for the list they developed. 	Include in Chapter 4.
Additional Ideas for Content (Stormwater Group Meetings)			
Considerations for procuring and contacting street sweeping services.	Include in Chapter 4.		Include in Chapter 4.
Providing sufficient water.	Include in Chapter 4.	<ul style="list-style-type: none"> • Several TAC members commented that Street Sweeping Operators return to a municipal facility to refill water supply while sweeping and this was not a topic worth including in the manual. • Exclude from the manual. 	Exclude from the manual.

Chapter 5. Optimizing Existing Street Sweeping Practices Programs

Purpose: Provide guidance for designing sweeping routes and improving efficiency/efficacy of existing programs.

Ideas for Content:	Proposed Action:	TAC Comments:	Decision:
Original Ideas for Content			
Literature synthesis to identify variables that influence efficiency/efficacy	Include in Chapter 5.	<ul style="list-style-type: none"> Recommend putting the literature synthesis (supporting information) in an appendix. 	Literature synthesis summary will be provided at the beginning of the chapter.
Designing street sweeping routes	Include in Chapter 5.		Include in Chapter 5.
Improving efficiency/efficacy of existing programs	Include in Chapter 5.		Include in Chapter 5.
Instructions for collecting data needed to improve; guidance for how to use the data	Include in Chapter 5.	<ul style="list-style-type: none"> Move instructions for collecting data to Chapter 6. Include guidance for how to use the data to optimize program in Chapter 5 (note that Chapter 3 include guidance for using data to set priorities). 	Move all data collection topics to Chapter 6. Chapter 5 will describe how to use the data to optimize street sweeping programs.
Guidance for developing performance measures for street sweeping activities	Include in Chapter 5.	<ul style="list-style-type: none"> Move to Chapter 6. 	Include in Chapter 5. This section will reference data described in Chapter 6, if necessary.
Additional Ideas for Content (Survey)			
Methods to minimize trips to the dewater/decant facility.	Include in Chapter 5 (24 selections as part of Survey Question 5).	<ul style="list-style-type: none"> Potential method to include: use drop boxes for water along the street sweeping route. This requires a roll off truck that carries the drop boxes. Also requires a method to cover the drop boxes during wet 	Include in Chapter 5.

		weather so the drop boxes do not fill up.	
Using street sweeper tracking data to improve program efficiency.	Include in Chapter 5 (36 selections as part of Survey Question 5).	<ul style="list-style-type: none"> Guidance for how to use the data is already proposed for inclusion in Chapter 3. 	Include in Chapter 5. Chapter 3 describes how the data will be used to identify high priority street sweeping routes. Chapter 5 will include using data to improve other aspects of the program.
Information or data a jurisdiction might collect to refine a program.	Include in Chapter 5 (24 selections as part of Survey Question 5).	<ul style="list-style-type: none"> Information on data collection occurs in Chapter 6. How to use the data to refine the program has already been proposed for inclusion. 	Move all data collection topics to Chapter 6.
Addressing challenges such as protruding tree limbs, non-standard curbs, and street sweeping during leaf season.	Include in Chapter 5 (26 selections as part of Survey Question 5).	<ul style="list-style-type: none"> Trees can be a major issue. 	Include in Chapter 5.
Sweeping different types of surfaces, including permeable pavements.	Include in Chapter 5 (25 selections as part of Survey Question 5).		Move to Chapter 4.
Route development and sweeping schedule optimization.	Included in original Chapter 5 content.		Include in Chapter 5.
How to practically or simply measure sweeping effectiveness for program modification.	Included in original Chapter 5 content.	<ul style="list-style-type: none"> Include topic in the context of how to use data to accomplish this (Collection of the necessary data can be covered in Chapter 6). 	Include in Chapter 5.
Methods to develop a street sweeping schedule, developing the schedule, delineation of	Developing a street sweeping schedule is already included in the		Include in Chapter 5 – see proposed action.

<p>routes or areas (for tracking purposes) called out in the schedule, and anticipating budget and staffing to run the street sweeping program.</p>	<p>original Chapter 5 content. Anticipated staffing will be included in Chapter 4. Anticipated budget will be included in Chapter 8.</p>		
<p>Adding new routes to meet the permit requirements; how to optimize the routes to reduce travel time, balance the workload, reduce left hand turns, etc.; how to optimize the schedule (e.g., heavy traffic, bus, freight routes swept weekly, etc.)</p>	<p>Include in Chapter 5.</p>		<p>Include in Chapter 5.</p>
<p>Efficient data collection and analysis will be key to finding efficiencies and improving water quality.</p>	<p>Included in original Chapter 5 content.</p>	<ul style="list-style-type: none"> • Cover data collection in Chapter 6. Cover analysis and using of data to optimize efficiencies in a Chapter 5. 	<p>Move all data collection topics to Chapter 6.</p>
<p>Addressing moving from an internal combustion engine sweeper to an electric or potentially a hydrogen sweeper. What are the impacts (environmentally, cost, availability etc.), what grant funding is available, how to propose for a grant etc.</p>	<p>Potentially include in Chapter 5. TAC – please comment.</p>	<ul style="list-style-type: none"> • Consider if the sweeper is PM10 certified. • See above comments on the cost of electric sweepers. • A great topic to include but grant options would have to be available for municipalities to consider a switch. • Too soon to tell without having data on run-time and O&M needs. • Exclude this topic. 	<p>Exclude from manual. Chapter 4 will describe different types of sweepers.</p>

Additional Ideas for Content (Stormwater Group Meetings)			
How to manage overlapping heavy rain and heavy leaf seasons.	Include in Chapter 5.		Include in Chapter 5.
The pros and cons of different water sources (non-potable).	Potentially include in Chapter 5. TAC – please comment.	<ul style="list-style-type: none"> • Ecology needs to weigh in if this is allowable under the permit before we go further. • Exclude from chapter. 	Exclude from manual.
Software to track how much waste is removed from different roads as opposed to just a full tank to help identify priority roads.	Include in Chapter 5.	<ul style="list-style-type: none"> • Move content regarding data collection to Chapter 6. Move content regarding how to use data to identify priorities to Chapter 3. 	Move software and tracking information to Chapter 6.
Other comments:		<ul style="list-style-type: none"> • Parking – alert residents. Parking enforcement can be an equity issue. • Parking enforcement signs are expensive and require maintenance and parking enforcement. 	Include in Chapter 4.

Chapter 6. Documenting and Tracking Street Sweeping Activities

Purpose: Provide guidance for documenting and tracking sweeping activities to assist Permittees with MS4 Permit compliance and tracking program costs.

Ideas for Content:	Proposed Action:	TAC Comments:	Decision:
Original Ideas for Content			
Tracking methods (e.g., basin, grids, etc.) and guidance for setting up tracking	Include in Chapter 6.		Include in Chapter 6.
Data collection: <ul style="list-style-type: none"> Automated and manual What to collect and how data can be used 	Include in Chapter 6.	<ul style="list-style-type: none"> Collect information to be more efficient (beyond what Permit requires). Understand the cost of using an automated system. Include level of accuracy for different systems. Contact City of Seattle for manual tracking template. 	Include in Chapter 6.
Comparison of time/costs for in-house vs contracting sweeping	Include in Chapter 6.	<ul style="list-style-type: none"> Consider including a contract template. Move to Chapter 8. 	Move to Chapter 8.
Additional Ideas for Content (Survey)			
N/A			
Additional Ideas for Content (Stormwater Group Meetings)			
Tracking methods such as excel or an asset management software.	Include in Chapter 6.		Include in Chapter 6.
How to communicate tracking results with other departments when tracking manually.	Include in Chapter 6.		Include in Chapter 6.

Using cameras on street sweepers.	Include in Chapter 6.		Include in Chapter 6.
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Chapter 7. Disposing of Street Sweeping Waste

Purpose: Provide guidance for estimating the size of decant facilities needed and planning for designing, constructing, and operating a decant facility.

Ideas for Content:	Proposed Action:	TAC Comments:	Decision:
Original Ideas for Content			
Applicable permit requirements	Include in Chapter 7.		Include in Chapter 7.
Develop a spreadsheet to: <ul style="list-style-type: none"> Estimate amount of waste generated Estimates number/size of decant facilities needed 	Include in Chapter 7.	<ul style="list-style-type: none"> Move to Chapter 6. 	Include in Chapter 7.
Considerations for wastewater treatment and solids disposal locations	Include in Chapter 7.		Include in Chapter 7.
Planning for designing, constructing, and operating a decant facility	Include in Chapter 7.		Include in Chapter 7.
Additional Ideas for Content (Survey)			
Methods for identifying when decant materials need to be sampled.	Include in Chapter 7 (27 selections as part of Survey Question 5).		Include in Chapter 7.
Ongoing maintenance and staffing requirements required to operate a decant facility.	Exclude from manual (only 15 selections as part of Survey Question 5).	<ul style="list-style-type: none"> Previous decant facility studies include an operations manual. Include links to these studies in the manual. 	Include a link to and reference the information provided in previous decant facility studies.
List what contaminants in sweep waste should be tested.	Include in Chapter 7.	<ul style="list-style-type: none"> Include meeting federal requirements. Contact City of Lacey 	Include in Chapter 7.

		and City of Seattle for more information.	
Establishing a decant facility.	Included in original Chapter 7 content.		Include in Chapter 7.
Additional Ideas for Content (Stormwater Group Meetings)			
Required permits for decant facilities.	Include in Chapter 7.		Include in Chapter 7.
Season variability for waste generated.	Include in Chapter 7.	<ul style="list-style-type: none"> • Move to literature synthesis. 	Include in Chapter 7.

Chapter 8. Street Sweeping Program Cost Considerations for ~~Establishing and Maintaining Programs~~

Purpose: Provide guidance for estimating and funding street sweeping program costs.

Ideas for Content:	Proposed Action:	TAC Comments:	Decision:
Original Ideas for Content			
Using data/information collected by the jurisdiction or from literature/surveys	Include in Chapter 8.		Include in Chapter 8.
Develop a spreadsheet for conducting a lifecycle cost estimate and projecting costs based on growth	Include in Chapter 8.	<ul style="list-style-type: none"> Move to Chapter 6. 	Include in Chapter 8. All cost information and cost related tools will be included in Chapter 8.
Staffing <ul style="list-style-type: none"> Estimating FTEs and resources. Workforce development program 	Include in Chapter 8.	<ul style="list-style-type: none"> Include topic as it relates to costs. 	Include in Chapter 8.
Provide Information about potential funding sources	Include in Chapter 8.		Include in Chapter 8.
Additional Ideas for Content (Survey)			
Cost considerations for testing street waste to determine if it is hazardous waste.	Include in Chapter 8 (21 selections as part of Survey Question 5).		Include in Chapter 8.
Addressing labor and equipment issues, such as hiring enough staff and purchasing street sweepers.	Include in Chapter 8 (25 selections as part of Survey Question 5).	<ul style="list-style-type: none"> Include topic as it relates to costs. 	Include in Chapter 8.
Comparison of cost between street sweeping and vactoring catch basins.	Could include or exclude (20 selections as part of Survey	<ul style="list-style-type: none"> Compare via \$/lb of pollutant. Include in future research. Exclude from manual. 	Exclude from manual.

	Question 5). TAC – please comment.	<ul style="list-style-type: none"> • Depends on jurisdiction. Some fleets already have several vectors, but less sweepers or vice versa. Historically, as long as the waste is removed following the permit guidelines it was up to the jurisdiction to determine the method. I think in the past vectors were easier to justify because they could be used for both sewer and storm, where sweepers are for street maint. activities only? Again, each jurisdiction is different. Something to consider when comparing (use in multiple departments, versus sole department property). • Exclude topic (outside the primary scope of the manual). 	
Cost summary of implementing street sweeping requirements in the Draft 2024-2029 Phase II Permits.	Include in Chapter 8 (21 selections as part of Survey Question 5).		Include in Chapter 8.
Program funding options.	Included in original Chapter 8 content.		Include in Chapter 8.
Funding for additional equipment and labor/disposal due to the increased sweeping requirements.	Include in Chapter 8.		Include in Chapter 8.

Cost of permit compliance for temporary disposal of sweepings as a sub-category of program cost considerations.	Potentially include in Chapter 8. TAC – please comment.	<ul style="list-style-type: none"> Exclude from manual. Suggest lumping temporary disposal into the overall total disposal costs. 	Exclude from manual.
We have already implemented an enhanced street sweeping program. We couldn't have done it without a grant to purchase a second sweeper and help fund getting the program started (sweep plan, O&M plan, operation, and adaptive management).	Grant funding options will be included in Chapter 8.		Include in Chapter 8.
Additional Ideas for Content (Stormwater Group Meetings)			
Include equipment rental and replacement.	Include in Chapter 8.		Include in Chapter 8.
Potential cost sharing.	Exclude from manual.	<ul style="list-style-type: none"> Agree with recommendation to exclude. 	Interlocal agreements, which could include cost sharing, is included in Chapter 4.

Chapter 9. Other Street Sweeping Considerations

Purpose: Discuss topics that do not fit in other chapters, but Permittees may need to know when implementing a street sweeping program.

Ideas for Content:	Proposed Action:	TAC Comments:	Decision:
Original Ideas for Content			
Emerging contaminants	Include in Chapter 9.		Include in Chapter 9.
Why/when to test waste	Include in Chapter 9.		Move to Chapter 7.
Equipment pool	Potentially already included in Chapter 8 (equipment replacement). TAC – please comment.	<ul style="list-style-type: none"> • Include in Chapter 8. 	Interlocal agreements, which could include cost sharing/equipment pool, is included in Chapter 4.
Permeable Pavement	Include in Chapter 9.		Move Chapter 4.
Additional Ideas for Content (Survey)			
Impacts of sand and deicers.	Include in Chapter 9.		Include in Chapter 9.
Template for Enhanced Maintenance Plan to apply for street sweeper grant.	Excluded from manual. Not enough resources in this contract to produce a separate document.		Exclude from manual.
Equipment theft.	Could include or exclude. TAC – please comment.	<ul style="list-style-type: none"> • Exclude from manual. • All equipment should be locked and fenced in. • Many of the newer sweepers are LOJACK equipped or equivalent with GPS trackers. 	Exclude from manual.
Additional Ideas for Content (Stormwater Group Meetings)			
Licensing for Street Sweeper Operators	Include in Chapter 9.	<ul style="list-style-type: none"> • Include how to assist employees obtaining the CDL 	Move to Chapter 4.

		- include in workforce development.	
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