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Environmental Quality Board

November 12, 2009

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RE: Recommended Usage of Compost Filter Sock in new DEP Manual

Dear Board Members:

ENVIRONMENTAL QUALITY BOARD

I have recently learned that the new, soon to be released E&S and Stormwater Regulations have a section on Compost Filter Sock in Chapter 4 – Sediment Barriers. In the second paragraph a sentence states "Socks with diameters less than 12" should only be used for residential housing lots of 1/2 acre or less that are tributary to a sediment basin or sediment trap".

I believe this statement is too restrictive on where Compost Filter Sock (CFS) less than 12" diameters can and should be used. I use CFS in many other installations where it makes sense based on the slope, and area to be controlled.

I believe the main reason for the statement is the concern about sediment storage capacity. As stated in the new manual several paragraphs later, "Accumulated Sediment shall be removed when it reaches 1/2 the above ground height of the sock". I agree with this – the burden on maintenance, including accumulated sediment removal, lies with the permit holder.

In the past, CFS was only installed in the field professionally with blower trucks. This created financial and logistic limitations on where CFS was installed. Today, 9" CFS is a commodity available from multiple reputable supply and erosion control companies throughout the state. It installs quickly and easily off pallets and contractors like to work with it. It's currently being used throughout the state in private development, public works, and Marcellus Shale well sites. It works. I know of no reports of major field failures because of storage capacity in the 9" CFS.

Does this mean 9" CFS needs sediment removed more often than 18" silt fence? The answer is probably yes, but it's my contention that the benefits of using the 9" CFS greatly outweigh this storage capacity concern – mainly, that it's a more robust BMP than 18" silt fence and should be proliferated. In general, CFS is not prone to problems such as pushing over, tearing fence fabric, fabric ripping off stakes, and if damaged it's much easier to repair/replace in the field.

CFS is already used widely in Pennsylvania. Industry estimates suggest that there will be more than one million linear feet of CFS installed in PA in 2009. I am suggesting that the proliferation of CFS in PA is keeping more sediment on jobsites and not in the waterways of the Commonwealth. That's a good thing and needs to continue to happen.

I ask that you remove this limitation on CFS less than 12" diameter in the new DEP manual, and that the use of 9" Compost Filter Sock should be stated as "interchangeable" with 18-inch silt fence, both being the basic entry-level Sediment Barrier.

ADDITIONAL COMMENTS:

Respectfully,  
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