

**State of Wisconsin  
Department of Natural Resources**

**Responses to Comments  
Land Application of Additives for Erosion Control  
Technical Standard Number 1050  
EGAD # 3800-2015-10**

**December 2015**

On October 5, 2015, the Wisconsin Department of Natural Resources (Department) issued a public notice on the proposed *Land Application of Additives for Erosion Control*, Technical Standard 1050. The Department received several comments on the proposed technical standard. Thank you to all for taking the time to review and comment on the proposed guidance. This document represents the Department's response to the written comments on the technical standard. To facilitate the responses, the Department may have paraphrased, rephrased, condensed, or consolidated comments.

**PUBLIC COMMENTS**

**Comments by Glory Adams**

Comment 1: "Changing DNR regulations calling Anionic Polyacrylamide and polymers additives is a misnomer to hide reality from citizens. These are chemicals and they need to be treated with the care of a chemical, not minimized".

Response: The use of the term "additive" is all encompassing and covers a broad range of substances used for settling or erosion control. The term additive is also consistent with the guidance titled "*Water Quality Review Procedures for Additives*". The term Additive is defined in the guidance as "Additive: substance, typically a commercial product, that has the potential to be directly discharged to a surface water and may cause toxicity to fish and aquatic organisms". No changes were made to the technical standard.

**Additional Comments by the Department**

Comment 1: Added text to note that additives cannot be directly applied to waters of the state.

Comment 2: Added text to request manufacturer's recommendations regarding additive degradation and the number of rainfalls before the additive needs to be re-applied.

Comment 3: The term "Additive" in the definitions section was modified to include: "Additive: substance, typically a commercial product, that has the potential to be directly discharged to a surface water and may cause toxicity to fish and aquatic organisms".

The final technical standard was approved on 12-16-2015.

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