



# Bassett Creek Watershed Management Commission

Item 7D.  
BCWMC 8-15-19

July 26, 2019

Mr. Mike Trojan  
Minnesota Pollution Control Agency  
520 Lafayette Road North  
St Paul, MN 55155

## Re: Verification and Certification of Stormwater Manufactured Treatment Devices (MTDs)

Dear Mr. Trojan:

The Bassett Creek Watershed Management Commission (BCWMC) and many other watershed districts and organizations (watersheds) across the metro area have seen an increase in the use of proprietary stormwater manufactured treatment devices (MTDs) proposed in development and redevelopment projects. Although some MTDs undergo testing and third party review, there are no widely accepted levels of treatment or pollutant removal efficiencies associated with these devices. Hence, the watersheds are forced to independently determine the pollutant removal efficiency of each device to evaluate whether a proposed project meets the watersheds' water quality standards.

The BCWMC and the watersheds listed below, recognize that this issue extends beyond our respective boundaries. We concluded that, ideally, there should be a nationwide, regional, or statewide program developed to evaluate and certify MTDs, including a determination of how the devices perform in Midwestern climates. In recognition of this need, we formally request that the MPCA take one of the following actions to address this issue at a broad level:

- 1) Cooperate with and support the implementation of the Water Environment Federation's (WEF) Stormwater Testing and Evaluation of Products and Practices (STEPP) verification program, currently under development. We prefer this option because the STEPP verification program is already well along in its development, it will be a nationwide program, and we understand that MPCA staff are already engaged in the program. Once implemented, the STEPP verification program would validate MTD performance; it would be up to the states (e.g., the MPCA) to certify the MTDs.
- 2) Develop its own statewide program for evaluating and certifying stormwater MTDs.

In either scenario, we also request that the MPCA include verified/certified MTDs in the Minnesota Stormwater Manual, if appropriate.

If you have questions, please contact me or any of the following watershed contacts to discuss.

Sincerely,

Laura Jester  
Administrator,  
BCWMC

Randy Anhorn  
Administrator, Nine  
Mile Creek WD

Tina Carstens  
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Ramsey Washington  
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c: Ryan Anderson, Minnesota Pollution Control Agency  
John Jaschke, Minnesota Board of Water and Soil Resources