**National Stormwater Testing and Evaluation of Products and Practices (STEPP) Workgroup**

*Steering Committee to Investigate the Feasibility and Future of a National Testing/Evaluation Program*

April 26, 2013, Alexandria, VA

Background:

In the past, when stormwater programs relied solely on technology-based approaches to meet MS4 permits, the reliance on laboratory results provided by the manufacturers/distributors of proprietary stormwater products was a standard method when choosing proprietary devices for stormwater programs. Often municipalities would develop "approved product" lists for devices deemed acceptable for use in designs and construction to meet stormwater requirements, and often the basis for approval has been producer-provided information. Accordingly, "product approval processes" were developed to formalize the method for a proprietary device to become listed on an approved product list for a municipality or other regulated stormwater entity. As the field matured and some state and local regulations became more stringent, this process grew more complex. Similarly, the population and diversity of stormwater products has continued to increase which adds another level of complexity to approved product process development.

Past and Current Testing/Evaluation Programs:

Another development that occurred is the rise of statewide, regional, and Federally-funded testing and verification programs that seek to standardize protocols and raise the level of product examination beyond the local level. The rise of technology testing and evaluation/verification programs illustrates a need that has arisen on an ad hoc basis. This ad hoc approach is driven primarily by the costly and onerous effort required by stormwater product manufacturers to gain approval for each separate MS4 where they want to sell their product. Considering the approximately 7,500 MS4's across the country, the effort to sell products at a national level is significantly hampered by this piecemeal approach to approval at the local level. The end result is a barrier to the spread of innovative and high-performing technology in the stormwater sector.

Examples of state/regional programs include the Technology Acceptance Reciprocity Partnership (TARP), the New Jersey Corporation for Advanced Technology (NJCAT), the Washington State's Technology Assessment Protocol-Ecology (TAPE), the Georgia Technology Assessment Program (GTAP), and the EPA's Environmental Technology Verification Program (ETV). Additionally, some states are in the process of developing programs, with one example being Virginia's Technology Assessment Protocol (VTAP) program. While the goal for these programs was clear – reduce the financial and administrative burden on manufacturers and raise the overall performance of proprietary stormwater practices – the results have been mixed. Anecdotal information illustrates that the amount of time required for a product to become approved through many of these programs is significant. Many in the sector also highlight the significant costs required to gain approvals. Still others see the ability to fund and sustain programs, as well as providing consistent and technically-focused leadership, as weak points for many programs. Overall, these factors act as barriers to innovation in the sector, which dampens our ability to adequately and cost-effectively address the water pollution challenges of today.

Development of the STEPP Workgroup and Steering Committee:

With the recent announcement of the discontinuation of the ETV program, coupled with a perception that other programs may not have produced expected results in the sector, a fresh investigation into testing and verification programs is needed. To help reduce or remove barriers to innovation in the

stormwater sector, the Water Environment Federation (WEF) first hosted a meeting in October, 2012 at WEFTEC 2012 to discuss the topic of testing and evaluation programs for stormwater devices. Meeting participants included approximately 25 officials from EPA, consultants, NGOs, and representatives from stormwater

manufacturers. This meeting resulted in the genesis of the STEPP Workgroup. The consensus from meeting participants was a need to consider the development of a national, standardized testing and evaluation program for proprietary stormwater products and devices. Specific issues associated with the need to evaluate a national program that was highlighted during the meeting included:

- A history of poorly-performing stormwater management devices currently in operation;
- The costs of existing state and regional testing/verification protocols;
- The lengthy timeframe and significant effort required to receive approval from existing programs;
- The onerous nature of many state and regional programs create barriers to the implementation of effective stormwater products at a national level;
- The costs and long timeframes associated with getting new and potentially effective stormwater treatment devices to market ; and
- The need to raise the bar on the performance expectations of stormwater management devices, products in a cost-efficient manner to address the growing problem of water quality and quantity impacts from urban runoff.

In response to information obtained at the WEFTEC 2012 meeting, WEF committed to investigate the feasibility of a national program to test and evaluate stormwater products and practices.

Development of the STEPP Workgroup and Steering Committee:

Subsequent to the WEFTEC 2012 meeting, interested parties contacted WEF staff for more information on this issue and the size of the workgroup grew to approximately 30 members. To streamline efforts, a Steering Committee was formed comprised of ten members and a chair along with two alternates. The purpose of this group is to investigate the feasibility of a national stormwater product testing and evaluation program. To meet this goal, other issues must be considered, such as the scale and nature of the problems facing the proprietary stormwater product industry regarding gaining approved product status (or equivalent) and the status of past and current national, regional, state, and local evaluation programs. Assuming the group finds that a national program is both feasible and beneficial, the group will develop the core components of this program and identify next steps for to move this important issue forward.

The selection process for selecting Steering Committee members focused on targeting all pertinent stakeholders – product/manufacturing sector, public sector, NGO, academic, and consulting – and more specifically, those who have experience and familiarity with the pertinent stormwater issues and existing programs. It is significant to note leaders within the Stormwater Equipment Manufacturing Association (SWEMA) are included on this committee, and we see this involvement as crucial in this effort. The official roster for the steering committee is listed on the following page:

1. Robert Adair, WEF Stormwater Committee, Convergent Water
2. Ryan Janoch, SWEMA, Terraphase
3. Chris French, SWEMA, Filterra
4. Jim Lenhart, Stormwater Northwest/ Contech
5. Chris Kloss, EPA
6. Clement Brown, City of San Diego
7. Steve Jadlocki, City of Charlotte
8. Alex Sandu, MWH
9. Robert Roseen, Geosyntec
10. Gary Belan, American Rivers
11. Seth Brown, WEF, Chair

Two alternates will be identified and added to the group at a later date.

STEPP Steering Committee Output:

The STEPP Steering Committee will produce a brief white paper (5-7 pages in length) over the next 4-6 months to document the findings of the investigation. This document will be the focus of a follow-up meeting of the STEPP Workgroup at WEFTEC 2013. A website (www.wef.org/STEPP/) will provide background information and the Steering Committee roster along with related information on current and future activities. The white paper will be posted to this webpage and will be freely available to interested parties and the public.

Questions regarding the STEPP Workgroup and Steering Committee should be addressed to Seth Brown, WEF Stormwater Policy and Program Manager via email (sbrown@wef.org) or phone (703.684.2423).