



Metropolitan North Georgia Water Planning District

International Tower | 229 Peachtree St., NE | Suite 100 | Atlanta, GA 30303

December 28, 2023

Sam Krauland
Rotondo Environmental Solutions LLC
2560 Huntington Ave, Suite 303
Alexandria, VA 22303

Re: Metropolitan North Georgia Water Planning District *Post-Construction Stormwater Technology Assessment Protocol* Submission Review

Dear Mr. Krauland:

This letter is in response to Rotondo's request for review of the StormGarden Biofilter System under the Metropolitan North Georgia Water Planning District's (District) Post-Construction Stormwater Technology Assessment Protocol (PCSTAP).

Per the objectives outlined on page one of the PCSTAP, the purpose of this review is to "characterize a technology's effectiveness in removing pollutants from stormwater runoff for an intended application and to compare test results with vendors' claims." The District's role is to review engineering reports and testing results submitted by vendors for their proprietary technology and assess conformity with the PCSTAP.

The Rotondo submission was reviewed by the District in consultation with Tetra Tech and the Technology Review Committee. The following is a summary of the main findings from that review:

1. The material provided included the Technical Evaluation Report prepared by Herrera Environmental Consultant and submitted to Washington's emerging stormwater treatment technologies (TAPE) program on June 10, 2019. The submittal includes samples and data from 15 qualifying storm events for total suspended solids (TSS) and 19 qualifying storm events for total phosphorus (TP) that were accepted by TAPE.
2. The 15 samples for TSS were found to be appropriate for the conditions typically found in Georgia. The d50 of 33 μm in the influent samples is consistent with typical soils in Georgia.

3. The proposed Flow Sizing methodology presented for calculating Water Quality is consistent with the Georgia Stormwater Management Manual Volume 2 (GSMM) Water Quality Volume Peak Flow:
 - a. StormGarden Biofilter System was sized to capture and treat 91 percent of the average annual runoff, a storm larger than the 85th percentile rain event required by the GSSM method.
 - b. The GSMM method for water quality relies on “the average 85th percentile annual rainfall event,” which is 1.2 inches. (GSSM, 2016, Section 3.1.7 pg 88)
4. The submittal states that the device can be sized to accommodate flow rates, which are consistent with Georgia runoff flows based on the 1.46 gpm/sf treatment rate proposed in the submittal.

Based on this review, the District has determined that the technology engineering report, performance claims, and performance testing results meet the PCSTAP criteria and warrant a concurrence under the PCSTAP. The Rotondo StormGarden Biofilter System will be added to the PCSTAP concurrence list, and this document will be made publicly available as a resource on the District website (<http://www.northgeorgiawater.org>).

As stated in the PCSTAP, the review of vendor data and public dissemination of information does not constitute an approval process or an endorsement of any product by the District. Local governments and other entities in the District are free to use this information as part of their processes to evaluate the suitability of these technologies or products for use within their jurisdiction. Local governments and other entities within the District may elect to allow or refuse use of any product on the concurrence list. They may also allow removal efficiencies that differ from manufacturer claims based on local geography, policies, or other conditions.

Thank you for your interest in PCSTAP evaluation. Please feel free to contact me at 470.378.1607 or KAtteberry@atlantaregional.com, if you have any questions.

Sincerely,



Katherine Atteberry

Stormwater Planning Manager