



# Minnesota Pollution Control Agency

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May 18, 2006

Mr. William McCully  
Rehbein Companies  
8651 Naples Street N.E.  
Blaine, MN 55449

RE: Evaporative Control System (ECS)

Dear Mr. McCully:

In your letter to the Minnesota Pollution Control Agency (MPCA) received on March 6, 2006, you inquired how the ECS system you have designed would be regulated by the National Pollutant Discharge Elimination System Construction Stormwater Permit for stormwater treatment. In many cases the design could qualify as a Filtration system (Part III,C,2) and not have the additional monitoring and mitigation plan as required by the Alternative Method section (Part III,C,5).

The following is taken directly from the MPCA requirements for a filtration system: The installed system must have the capability of capturing a volume of water equal to ½" times the new impervious surface created by the project. The system cannot be used to treat runoff from exposed soils during construction. There must be no standing water in the ECS area 48 hours after a rain event occurs. There must be 3' of separation between the bottom of the ECS system and the seasonally saturated groundwater level. A pretreatment device is required. This could be accomplished by considering the first row of cells pre-treatment as long as the volume of storage for that area is not including in the sizing equation.

If the ECS system is only receiving precipitation that falls on the system itself (such as a ball field), there are no regulations that apply. The requirements listed above only apply to ECS systems that are receiving runoff from new impervious surfaces. There would be no requirements for adding an ECS system to a previously constructed area.

Sincerely,

A handwritten signature in black ink, appearing to read "Todd Smith".

Todd Smith, P.E.  
Stormwater Policy and Technical Assistance  
St. Paul Office

TS:smd

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