

Alternative BMP Submission Form Instructions

These instructions are intended to assist with the submission of Alternative BMPs for consideration by the Department of Environmental Protection (DEP). If you need further assistance contact DEP's Bureau of Clean Water (BCW) at RA-ALTERNATEBMP@pa.gov.

Definitions

Before completing the Alternative BMP Submission Form please ensure that your proposed BMP would be considered an Alternative BMP by BCW and is not already approved under existing DEP technical guidance. To assist applicants BCW provides the following definitions. These definitions are solely for the purpose of these instructions and do not affect regulatory requirements under Chapter 102.

Alternative Design Standard – Any method proposed by an applicant of a permit under Chapter 102 for managing post-construction stormwater that does not conform with the regulatory design standards at 25 Pa. Code §§ 102.8(g)(2) and (3) or the approaches recommended to achieve compliance with the regulatory design standards contained in the Pennsylvania Stormwater Best Management Practices Manual (BMP Manual). Any approach to managing post-construction stormwater that will not achieve one of the following standards is considered an alternative design standard:

- 1) Requirements contained in a current and approved Act 167 Plan;
- 2) Management of the net change in stormwater volume and quality comparing pre- and post-construction conditions up to the 2-year/24-hour storm event; and
- 3) Management of the net change in peak rate of runoff comparing pre- and post-construction conditions for the 2-, 10-, 50-, and 100-year/24-hour storm events.

Alternative BMP – An erosion and sediment control (E&S) or post-construction stormwater management (PCSM) BMP that is either 1) not identified in the Erosion and Sediment Pollution Control Program Manual (E&S Manual) or the BMP Manual; or 2) is identified in the E&S Manual or BMP Manual but deviates from the recommendations in these manuals such that, in the judgment of DEP or a delegated county conservation district (CCD), the BMP may function differently from the BMP contained in the manuals. These BMPs will be reviewed by BCW for placement on the Alternative BMP List when a request to do so is received.

Modified BMP – An E&S or PCSM BMP that is identified in the E&S Manual or BMP Manual but deviates from the recommendations in these manuals. The deviation does not, however, change the function of the BMP. For example, a BMP that is designed in a way that deviates from the recommended hydraulic loading ratio or dewatering time is a modified BMP. Modified BMPs may be approved by the office reviewing the E&S or PCSM Plan. CCDs will consult with DEP regional offices and DEP's Bureau of Clean Water as necessary to consider modified BMPs.

Alternative Design Standards and Modified BMPs will not be identified on DEP's List of Alternative BMPs. Alternative Design Standards will be approved by the CCD or DEP regional office reviewing the permit application.

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The following information pertains to completing the Alternative BMP Submission Form. For any question that is not applicable to the alternative BMP, enter "N/A."

Manufacturer Information

List the name and address of the company that manufactures the product (if applicable). Provide a contact person and their phone number and email address. The contact person should be the person that is submitting the product for review and will be the person contacted in the event DEP has questions about the submission.

Alternative BMP Information

1. Enter the trade name of the BMP given by the manufacturer.
2. Provide a generic name for the BMP. Do not report the proprietary or trademark name but rather the general name for the BMP (e.g., "filter sock" instead of "ABC super sock").
3. Indicate if the BMP is intended for E&S or PCSM.
4. Provide a description of the BMP including its use and intended function.
5. Attach drawings and design details for the alternative BMP and check the box to verify this has been completed.
6. If available, provide a website that provides information for the BMP. Otherwise, leave this blank.
7. Provide information on appropriate sizing for the BMP in the space provided or attach information on sizing.
8. Check the appropriate box (Yes or No) to indicate whether the BMP has been installed or utilized in Pennsylvania. If Yes, identify the location(s) and date(s) of utilization.
9. Check the appropriate box (Yes or No) to indicate whether the BMP has been approved for use in other states. If Yes, list other states that allow the use of the BMP. Provide a contact person for that state, if possible.
10. List the benefits and advantages the BMP has that make the product unique. For example, the BMP has a better flow rate than other comparable BMPs.
11. List all disadvantages or limitations that need to be considered for the use of the BMP. For example, silt fence has issues with installation in wooded areas, due to the roots that are problematic in creating the necessary installation trench for silt fence.
12. Describe the material composition of the BMP. For example, concrete box with inclined plates, multi-layer fence composed of nylon fabric, natural fiber, etc.
13. Check the appropriate box (Yes or No) to indicate if the BMP contains any chemicals or pollutants. Examples include flocculants, polyacrylamides, soil binders, etc. If Yes, identify the chemicals and the amount or dose that is expected to be introduced to stormwater. Products with chemicals that may cause pollution may not be approved. Check the appropriate box (Yes or No) to indicate whether the BMP has been approved by the National Science Foundation (NSF); if Yes attach the approval letter.
14. Check the appropriate box (Yes or No) to indicate whether the BMP been tested by a third party. If Yes, attach a copy of the test procedures and results to the submission and provide the following information:

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- **Company Name** – Report the company or organization that performed the testing.
 - **Address and Contact Information** – Identify the address and contact information for an individual representing the company or organization.
 - **Accreditation(s)** – List any accreditations that the company or organization has that are related to this field of study.
 - **Product Testing Standards** – List standards that were utilized during the testing. List AASHTO and/or ASTM test numbers, if applicable.
15. Describe installation procedures for the BMP in the space provided or attach instructions to the submission.
16. Indicate if the BMP requires special equipment to be utilized for installation. For example, the slicing method of installing silt fence requires a special attachment to a tractor or skid steer. Describe the equipment and include photographs if available.
17. Check the appropriate box (Yes or No) to indicate whether educational materials for the BMP such as videos, webinars, or design tutorials are available on installation techniques, functions, and usage. If Yes, provide a location such as a website where can those be accessed. Otherwise, attach the materials.

E&S BMP

Only complete this section for an E&S BMP. If the request is for a PSCM BMP enter “N/A” or leave this section blank.

1. Check the appropriate box to indicate whether there is a similar BMP in the E&S Manual. If Yes, identify the similar BMP and attach a comparison of the key design elements for the similar BMP and proposed alternative BMP.
2. Provide any other information that was not previously discussed that you wish to provide for the BMP that would help in DEP’s evaluation. This may include testing related to the BMP’s function and any applicable material strengths.

PCSM BMP

Only complete this section for a PCSM BMP. If the request is for an E&S BMP enter “N/A” or leave this section blank.

1. Check the appropriate box to identify the main function(s) of the BMP (select all that apply).
2. Identify any other functions of the BMP. For example, a detention basin’s main function is rate management, but it may also account for some volume reduction based on the residence time of the stormwater in the basin and infiltration/evapotranspiration rates.
3. Identify if there is a similar stormwater BMP listed in the BMP Manual. If Yes, identify the similar BMP (provide the name and BMP number from the BMP Manual) and attach a comparison of the key design elements for the similar BMP and proposed alternative BMP.
4. For BMPs intended to provide water quality management credit, report the BMP’s median outflow concentrations (MOCs) for Total Suspended Solids (TSS), Total Phosphorus (TP), and Total Nitrogen (TN) in milligrams per liter (mg/L). MOCs are the median effluent concentrations that are determined through EPA-approved testing methods for 1) a range of flow rates through the BMP, and 2) a range of known influent concentrations of pollutants. Ensure that the MOCs reported are supported by the test data. Attach the data supporting the MOCs to the Alternative BMP Submission Form.

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5. Provide any additional information for the BMP evaluation.

Alternative BMP Submission Review Checklist

Check the appropriate box in the column on the left side of the checklist to indicate whether the item has been provided as part of the submission. Not all information is necessary (e.g., data supporting MOCs is not applicable to E&S BMPs). The columns on the right side are for DEP use only.