

## Categories

EC	Erosion Control	<input checked="" type="checkbox"/>
SE	Sediment Control	<input type="checkbox"/>
TC	Tracking Control	<input type="checkbox"/>
WE	Wind Erosion Control	<input type="checkbox"/>
NS	Non-Stormwater Management Control	<input type="checkbox"/>
WM	Waste Management and Materials Pollution Control	<input type="checkbox"/>

## Legend:

- Primary Category**
- Secondary Category**

## Targeted Constituents

Sediment	<input checked="" type="checkbox"/>
Nutrients	<input type="checkbox"/>
Trash	<input type="checkbox"/>
Metals	<input type="checkbox"/>
Bacteria	<input type="checkbox"/>
Oil and Grease	<input type="checkbox"/>
Organics	<input type="checkbox"/>

## Potential Alternatives

None

Copyright 2025 by the California Stormwater Quality Association

## Description and Purpose

Active Treatment Systems (ATS) reduce turbidity of construction site runoff by introducing chemicals to stormwater through direct dosing or an electrical current to enhance flocculation, coagulation, and settling of the suspended sediment. Coagulants and flocculants are used to enhance settling and removal of suspended sediments and generally include inorganic salts and polymers (USACE, 2001). The increased flocculation aids in sedimentation and ability to remove fine suspended sediments, thus reducing stormwater runoff turbidity and improving water quality.

## Suitable Applications

ATS can reliably provide exceptional reductions of turbidity and associated pollutants and should be considered where turbid discharges to sediment and turbidity sensitive waters cannot be avoided using traditional BMPs. Additionally, it may be appropriate to use an ATS when site constraints inhibit the ability to construct a correctly sized sediment basin, when clay and/or highly erosive soils are present, or when the site has very steep or long slope lengths.

## Limitations

Dischargers choosing to utilize chemical treatment in an ATS must follow all guidelines of the Construction General Permit Attachment F – Active Treatment System Requirements. General limitations are as follows:



- Numeric Effluent Limit (NEL) for all discharges (10 NTU daily flow-weighted average)
- Limited availability of chemical residual testing procedures that meet permit requirements for flow-through treatment
- Specific field and classroom ATS training required to operate equipment
- Batch treatment requires extensive toxicity testing of effluent
- Batch treatment requires large footprint to accommodate treatment cells
- Requires additional filtration to remove residual floc and treatment chemicals prior to discharge
- Petroleum based polymers should not be used
- Requires site-specific design and equipment
- Limited discharge rates depending on receiving water body
- Labor intensive operation and maintenance
- ATS costs are higher on a unit basis for smaller sites that would be expected to have a lower volume of treated runoff
- ATS costs are seasonably variable due to increases or decreases in rainfall volumes

## **Implementation**

Turbidity is difficult to control once fine particles are suspended in stormwater runoff from a construction site. Sedimentation ponds are effective at removing larger particulate matter by gravity settling but are ineffective at removing smaller particulates such as clay and fine silt. Sediment ponds are typically designed to remove sediment no smaller than medium silt (0.02 mm). ATS may be used to reduce the turbidity of stormwater runoff. With an ATS, very high turbidities can be reduced to levels comparable to what is found in streams during dry weather.

## ***Criteria for ATS Product Use***

Chemically treated stormwater discharged from construction sites must be non-toxic to aquatic organisms. The following protocol should be used to evaluate chemicals proposed for stormwater treatment at construction sites. Authorization to use a chemical in the field based on this protocol does not relieve the applicant from responsibility for meeting all discharge and receiving water criteria applicable to a site.

- An ATS Plan, which includes an Operation and Maintenance component, a Monitoring, Sampling and Reporting component, a Health and Safety component, and a Spill Prevention component must be prepared and submitted to the Regional Water Quality Control Board (RWQCB).

- Treatment chemicals should be approved by EPA for potable water use or otherwise be demonstrated to be protective of human health and the environment. Chemical residual or whole effluent toxicity testing is required.
- Prior to field use of chemical treatment, jar tests are to be conducted to demonstrate that turbidity reduction necessary to meet the NELs and receiving water criteria can be achieved. Test conditions, including but not limited to raw water quality and jar test procedures, should be indicative of field conditions. Although these small-scale tests cannot be expected to reproduce performance under field conditions, they are indicative of treatment capability. A minimum of six site-specific jar tests must be conducted per chemical.
- The proposed maximum dosage should be at least a factor of five lower than the no observed effects concentration (NOEC).
- Effluent discharge from an ATS to a receiving water is conditional upon the favorable results of full-scale whole effluent bioassay/toxicity testing for batch treatment systems and upon chemical residuals testing for flow-through systems.
- Contact the RWQCB for a list of treatment chemicals that may be pre-approved for use.

### ***Active Treatment System Design Considerations***

The design and operation of an ATS should take into consideration the factors that determine optimum, cost-effective performance. While site characteristics will influence system design, it is important to recognize the following overriding considerations:

- The right chemical must be used at the right dosage. A dosage that is either too low or too high will not produce the lowest turbidity. There is an optimum dosage rate. This is a situation where the adage “adding more is always better” is not the case.
- The coagulant must be mixed rapidly into the water to insure proper dispersion.
- The mixing system for batch treatment must be sized to provide adequate mixing for the design storage volume. Lack of adequate mixing during the flocculation phase results in flocs that are too small and/or insufficiently dense. Too much mixing can rapidly destroy floc as it is formed.
- Care must be taken in the design of the withdrawal system to minimize outflow velocities and to prevent floc discharge. The discharge should be directed through a filtration system such as sand, bag, or cartridge filter that would catch any unintended floc discharge.
- ATS is also regulated for pH of the discharge. A pH-adjusting chemical should be added into the treated water to control pH if the selected coagulant requires alteration of the pH of the discharge outside of the acceptable range.

### ***Active Treatment System Design***

ATS can be designed as batch treatment systems using either ponds or portable trailer-mounted tanks, or as flow-through systems using any number of proprietary designed systems.

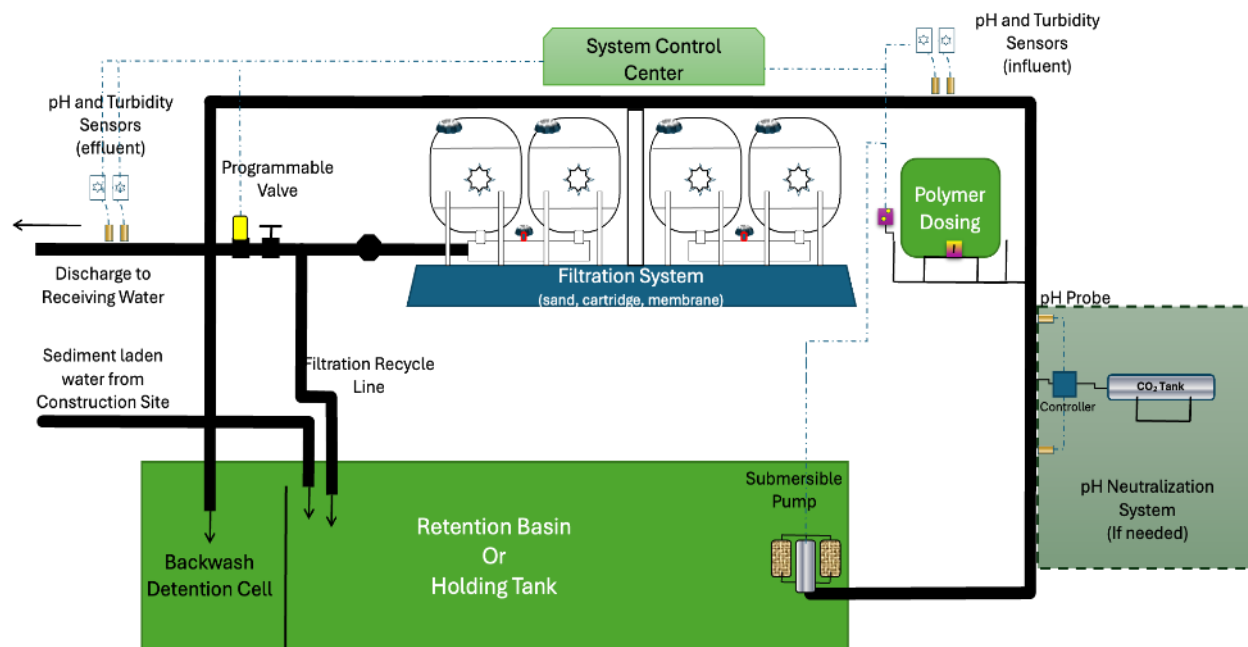


Figure has been adapted from Port of Seattle response to Washington Dept. of Ecology Action Order 2948

## Batch Treatment

Batch Treatment systems consist of the stormwater collection system (either temporary diversion or the permanent site drainage system); a sediment basin, trap or holding tanks; pumps; a chemical feed system; treatment cells; and, interconnecting piping.

Batch treatment systems should use a minimum of two lined treatment cells. Multiple treatment cells allow for clarification of treated water while other cells are being filled or emptied. Treatment cells may be basins, traps, or tanks. Portable tanks may also be suitable for some sites.

The following equipment should be located in a secured, covered location:

- The chemical injector
- Secondary contaminant for acid, caustic, buffering compound, and treatment chemical
- Emergency shower and eyewash
- Monitoring equipment which consists of a pH meter and a turbidimeter (if not already within the instrumentation panel of the chemical injector)

## Flow-through Treatment

At a minimum, a flow-through ATS system consists of the stormwater collection system (either temporary diversion or the permanent site drainage system), an untreated stormwater storage pond or holding tank, and a chemically enhanced filtration system.

Stormwater is collected at interception point(s) on the site and is diverted by gravity or by pumping to an untreated stormwater storage pond or other untreated stormwater holding area.

The stormwater is stored until treatment occurs. It is important that the holding pond be large enough to provide adequate storage.

Stormwater is then pumped from the untreated stormwater storage pond to the chemically enhanced filtration system where polymer is added. Adjustments to pH may be necessary before chemical addition. The filtration system continually monitors the stormwater for turbidity and pH. If the discharge water is out of the acceptable turbidity or pH range, the water is recycled to the untreated stormwater pond (or holding tank) where it can be retreated. Flow through systems must ensure that:

- Cumulative flow volume shall be recorded daily. The data recording system shall have the capacity to record a minimum of seven days of continuous data.
- Instrumentation systems are interfaced with system control to provide auto shutoff or recirculation in the event that effluent measurements exceed turbidity or pH.
- Upon system upset, power failure, or other catastrophic event, the ATS will default to a recirculation mode or safe shut down.
- The instrumentation system provides a method for controlling coagulant dose, to prevent potential overdosing.

## ***Sizing Criteria***

An ATS shall be designed and approved by a Certified Professional in Erosion and Sediment Control (CPESC), a Certified Professional in Storm Water Quality (CPSWQ); a California registered civil engineer; or any other California registered engineer.

ATS must be designed to capture and treat (within 72 hours) runoff from the 10-year 24-hour storm event. The runoff volume of the watershed area to be treated from this size storm event is required to be calculated using the Rational Method with a runoff coefficient of 1.

If sediment basins are used to capture flow-through or batch treatment, see SE-2, Sediment Basin, for design criteria. Bypass should be provided around the ATS to accommodate extreme storm events. Primary settling should be encouraged in the sediment basin/storage pond. A forebay with access for maintenance may be beneficial.

The permissible discharge rate governed by potential downstream effect should be used to calculate the recommended size of the treatment cells. Local requirements related to Phase I or Phase II NPDES permit thresholds should be considered in developing maximum discharge rates the ATS Plan.

## **Inspection and Maintenance**

ATS must be operated and maintained by individuals with experience in their use and trained in accordance with training requirements below. ATS should be monitored continuously while in use. A designated responsible person shall be on site daily at all times during treatment operations. Daily on-site visual monitoring of the system for proper performance shall be conducted and recorded in the project data log. The name, phone number, and training documentation of the person responsible for system operation and monitoring shall be included in the project data log.

The following monitoring requirements and results should be recorded in the data log:

## ***Operational and Compliance Monitoring***

- Effluent flow rate and volume shall be continuously monitored and recorded at 15- minute or less intervals.
- Influent and effluent pH must be continuously monitored and recorded at 15-minute or less intervals.
- Influent and effluent turbidity (expressed in NTU) must be continuously monitored and recorded at 15-minute or less intervals.
- The type and amount of chemical used for pH adjustment, if any, shall be monitored and recorded.
- Dose rate of chemical used in the ATS system (expressed in mg/L) shall be monitored and reported 15-minutes after startup and every 8 hours of operation.
- Laboratory duplicates – monthly laboratory duplicates for residual coagulant analysis must be performed and records shall be maintained onsite.
- Effluent shall be monitored and recorded for residual chemical/additive levels.
- If a residual chemical/additive test does not exist and the ATS is operating in a batch treatment mode of operation refer to the toxicity monitoring requirements below.

## ***Toxicity Monitoring***

### Batch Treatment

Toxicity testing for systems operated in batch treatment mode should be made in accordance with the following:

- Acute toxicity testing on effluent samples representing effluent from each batch prior to discharge shall be undertaken. All bioassays shall be sent to a laboratory certified by the Department of Health Services (DHS) Environmental Laboratory Accreditation Program (ELAP). The required field of testing number for Whole Effluent Toxicity (WET) testing is E113.
- Acute toxicity tests shall be conducted with the following species and protocols. The methods to be used in the acute toxicity testing shall be those outlined for a 96-hour acute test in “Methods for Measuring the Acute Toxicity of Effluents and Receiving Water to Freshwater and Marine Organisms, USEPA-841-R-02-012” for Fathead minnow, *Pimephales promelas*. Rainbow trout, *Oncorhynchus mykiss*, may be used as a substitute for fathead minnow.

All toxicity tests shall meet quality assurance criteria and test acceptability criteria in the most recent versions of the EPA test method for WET testing.

## Flow-through Treatment

Toxicity testing for systems operated in flow-through treatment mode should be made in accordance with the following:

- A residual chemical test method shall be used that has a method detection limit (MDL) of 10% or less than the maximum allowable threshold concentration (MATC) for the specific coagulant in use and for the most sensitive species of the chemical used. The MATC is equal to the geometric mean of the No Observed Effect Concentration (NOEC) and Lowest Observed Effect Concentration (LOEC) Acute and Chronic toxicity results for most sensitive species determined for the specific coagulant.
- The residual chemical test method shall produce a result within one hour of sampling.
- A California State certified laboratory shall validate the selected residual chemical test. Specifically, the lab will review the test protocol, test parameters, and the detection limit of the coagulant. The discharger shall electronically submit this documentation as part of the ATS Plan.

### ***Numeric Effluent Limit (NEL) Compliance:***

All chemically treated stormwater must be sampled and tested for compliance with pH and turbidity limits. These limits have been established by the Construction General Permit. Sampling and testing for other pollutants may also be necessary at some sites. Turbidity limits have been set as 10 NTU as a daily flow-weighted average or 20 NTU from a single sample. pH must be within the range of 6.0 to 9.0 standard units. It is often possible to discharge treated stormwater that has a lower turbidity than the receiving water and that matches the pH.

Treated stormwater samples and measurements should be taken from the discharge pipe or another location representative of the nature of the treated stormwater discharge. Samples used for determining compliance with the water quality standards in the receiving water should not be taken from the treatment pond prior to decanting. Compliance with the water quality standards is determined in the receiving water.

### ***Operator Training:***

Operators shall have training specific to using an ATS and liquid coagulants for stormwater discharges in California. The training shall be in the form of a formal class with a certificate and requirements for testing and certificate renewal. Training shall include a minimum of eight hours classroom and 32 hours field training.

### ***Standard BMPs:***

Erosion and sediment control BMPs should be implemented throughout the site to prevent erosion and discharge of sediment to the ATS. Some types of chemical coagulation and flocculation are only achievable in water below a certain turbidity; therefore, minimizing the amount of sediment reaching the system will increase the likelihood of meeting effluent limits and will potentially lower costs of chemical dosing.

## ***Sediment Removal and Disposal***

- Sediment shall be removed from the storage or treatment cells as necessary to ensure that the cells maintain their required water storage (i.e., volume) capability.
- Handling and disposal of all solids generated during ATS operations shall be done in accordance with all local, state, and federal laws and regulations.
- If sediment is determined to be non-toxic, it may be incorporated into the site away from drainages.

## **References and Additional Resources**

Construction Site Best Management Practices (BMPs) Manual CTSW-RT-24-425.11.1, California Department of Transportation (Caltrans), March 2024.

Engineering and Design – Precipitation/Coagulation/Flocculation. United States Army Corps of Engineers, EM 1110-1-4012, 2001.

Evaluation of Active Treatment Systems (ATS) for Construction Site Runoff. California Building and Industry Association (prepared by Geosyntec Consultants), 2008.

Stormwater Management Manual for Western Washington, Volume II – Construction Stormwater Pollution Prevention, Washington State Department of Ecology, August 2001.