



September 9, 2020

Josepha A. Diekfuss, PhD, PE  
Vice President, Engineered Systems  
P4 Infrastructure  
622 N. Water Street, Suite 406  
Milwaukee, WI 53202

Dear Mr. Diekfuss,

The Department supports the use of site-specific monitoring data and real time control technology to enhance pollutant reductions. The Department appreciates that the use of monitoring technology, such as the P4 INFIL-Tracker system, will assist in improved management of MS4 systems and optimization of pollutant removal. This is especially important in highly developed urban areas with large pollutant reduction goals where availability of land to add additional runoff controls is limited.

The Department does not approve specific proprietary products or devices that are used to address runoff water quality. The exception is water quality treatment additive products, which are given a water quality use restriction to protect against aquatic toxicity. As a result, upon review of the information you provided related to the P4 INFIL-Tracker System, the Department does not consider this system as an additive product, and therefore, does not require formal review prior to use. As with other products, the Department does not limit its use in appropriate settings as long as it is done in accordance with applicable rules, regulations, and technical standards.

The white paper provided by P4 on July 24, 2020 outlined methodology for calculating additional pollutant removal from BMP devices after data is collected using the INFIL-Tracker System. In general, the Department will allow real time control BMPs to improve treatment and infiltration under the following design conditions:

- BMPs are designed, installed, and maintained in accordance with applicable technical standards.
- Each BMP is evaluated individually using site-specific data collection from said BMP.
- Monitoring will occur over the life of the BMP device.
- For infiltration devices, the 24 hour (surface) and 72 (subsurface) drawn down times from the end of a rainfall event shall be maintained.

Please let me know if you have any other questions.

Sincerely,



Jacob Zimmerman, PE  
Stormwater Engineer

CC: Christopher Foley, PhD, PE, FASCE – P4 Infrastructure  
Todd Weik, PLA, CPESC – CBC Engineering and Associates, Ltd  
Benjamin Benninghoff – WI DNR  
Eric Rortvedt, PE – WI DNR