



February 25, 2016

Robert E. Cooper  
Office of Stormwater Management  
Virginia Department of Environmental Quality  
629 East Main Street  
Richmond, VA 23218

**RE: Submittal for MTD Approval of the  
FocalPoint/High Performance Modular Biofiltration System (HPMBS)**

Dear Mr. Cooper:

We are pleased to submit the Manufactured Treatment Device (MTD) Registration Form and supporting documentation for the FocalPoint HPMBS in accordance with the Guidance Memo Number 14-2009 titled "Interim Use of Stormwater Manufactured Treatment Devices (MTDs).

Specifically, the documents submitted provide descriptive information of the FocalPoint HPMBS, operation and maintenance procedures and performance studies. The data provided in the field performance study includes system sizing\design methods, contributing drainage area and land cover, storm event and runoff parameters, and event mean concentrations (EMCs) of the influent and effluent for suspended sediment (TSS) and Total Phosphorus (TP). This data demonstrates compliance with the pollutant removal goals in Virginia (i.e., EMC Percent TP removal efficiency of 50%) and provides specifiers and reviewers with proper sizing of the technology.

In addition, two beneficial attributes of the system that are not addressed by the Departments MTD approval process include: 1) runoff reduction because of the boxless construction; and 2) design versatility in seasonal high groundwater table conditions whereby the underdrain and ponding depths could be modified without sacrificing media performance to accommodate a 29" vertical profile as opposed to a 36" vertical profile. We request the Department acknowledge these attributes in your review of the system.

We thank you for your time and consideration and look forward to your submittal review.

Respectfully,



W. Scott Gorneau, P.E., CPSWQ  
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cc: Corey Simonpietri – ACF Environmental  
Thomas Diloreto – ACF Environmental

Attachment 1	Manufactured Treatment Device Registration Form
Attachment 2	Technology Evaluation Report of our TAPE Level Field Study
Attachment 3	TSS Laboratory Removal Results Summary Report
Attachment 4	Sil-Co-Sil 106 Particle Size Distribution
Attachment 5	Representative Maintenance Log