



COMMONWEALTH of VIRGINIA

DEPARTMENT OF ENVIRONMENTAL QUALITY

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Director

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July 9, 2014

Mr. Derek Berg
71 US Route 1, Suite F
Scarborough, Maine 04074

Re: Assignment of Percent Removal Efficiencies for Total Phosphorus

Dear Mr. Berg,

Thank you for your submittal of the Manufactured Treatment Device (MTD) Registration Form and supporting documentation for the CDS® System. The MTD information provided was reviewed for the purpose of assigning a pollutant removal efficiency for total phosphorus (TP). This review was performed in accordance with the Guidance Memo Number 14-2009 titled "Interim Use of Stormwater Manufactured Treatment Devices (MTDs) to meet the new Virginia Stormwater Management Program (VSMP) Technical Criteria, Part IIB Water Quality Design Requirements". The review process included the analysis of the documents submitted and any other publically available reports.

In addition to the registration form, two studies were also submitted for review. One study was the application to Washington State Department of Ecology Water Quality Program for General Use Level Designation (GULD). The second study was a scour test evaluation for the state of New Jersey. In April 2014, CDS® System received their GULD approval for 50% removal of total suspended solids with a d_{50} of 50- μ m. Consistent with Guidance Memo Number 14-2009, CDS® System is receiving an event mean concentration percent TP removal efficiency of 20%. As stated in the guidance memo, this information will be posted on the Virginia Stormwater Clearinghouse website. This MTD and the assigned removal efficiency can be manually added into Virginia Runoff Reduction spreadsheet to demonstrate compliance with Runoff Reduction Method.

If you have any questions regarding this information, please contact Robert E. Cooper, P.E. at (804) 698-4033 or e-mail at Robert.Cooper@deq.virginia.gov.

Sincerely;

A handwritten signature in blue ink that reads "Fred K. Cunningham".

Fred K. Cunningham

Director

Office of Water Permits