



June 20, 2014

Mr. Robert Cooper
Office of Stormwater Management
Virginia Department of Environmental Quality

**Re: Approval Request for Manufactured Treatment Device,
Aqua-Swirl[®] Stormwater Treatment System**

Dear Mr. Cooper,

AquaShield[™], Inc. is pleased to submit information in support of this approval request for the Aqua-Swirl[®] Stormwater Treatment System. This approval request is submitted in accordance with Guidance Memo No. 14-2009 dated May 15, 2014, Interim Use of Stormwater MTDs.

We are requesting that the Aqua-Swirl[®] be granted a Total Phosphorus (TP) removal credit of 40% based on NJCAT-verified field testing of an Aqua-Swirl[®] Model AS-5 for 80% TSS removal efficiency following the TARP Tier II protocol. The Aqua-Swirl[®] currently holds NJDEP Laboratory Certification and Washington State Department of Ecology General Use Level Designation (GULD) for Pretreatment and Conditional Use Level Designation (CULD) for Basic (TSS) treatment. The CULD is based on the NJCAT-verified field test allowing the Aqua-Swirl[®] to be used as a standalone device for 80% TSS removal efficiency on a per storm event basis.

The following documents are attached for your evaluation in support of this 40% TP removal credit approval request:

- Attachment 1, MTD Registration Form
- NJCAT Field Test Verification Report for Aqua-Swirl[®] Model AS-5, November 2012
- NJCAT Field Test Summary Letter, February 15, 2013
- NJDEP Aqua-Swirl[®] Laboratory Test Certification Letter, August 31, 2011
- Washington State Department of Ecology GULD and CULD for Aqua-Swirl[®], October 2013
- Aqua-Swirl[®] Inspection & Maintenance Manual
- AquaShield[™] Limited Warranty

Thank you for considering this information, and of course please let me know if additional information is needed at this time.

Respectfully submitted,

AquaShield[™], Inc.
Mark B. Miller, P.G.
Research Scientist