

August 27, 2014

Robert Cooper
Virginia Department of Environmental Quality
629 Main Street
Richmond, VA 23219

Re: MTD Registration with VDEQ for the First Defense[®]


Dear Mr. Cooper:

Please accept the enclosed MTD Registration Document and binder of supporting documentation to register the First Defense[®] as an approved BMP to remove up to 20% Total Phosphorus from stormwater runoff.

The First Defense[®] is a vortex separator that has been used to remove sediment, trash and hydrocarbons from stormwater runoff for nearly 10 years. It has been independently tested in the laboratory and approved by nearly 20 state, county and city agencies across the US.

Please do not hesitate to contact me if you have any questions about the First Defense[®] or the technical documentation contained within this submission. We truly appreciate the opportunity to market the First Defense[®] in Virginia.

Kind regards,



Lisa Lemont, CPSWQ
Business Development Manager