



Date: 2/25/2019

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

**Subject: Submittal of MTD Approval of the Kraken Filter**

Dear Mr. Cooper,

We are pleased to submit our Kraken Stormwater Filtration System for acceptance by the Virginia Department of Environmental Quality and have listed on the Virginia Stormwater BMP Clearinghouse website. This application is 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 Kraken Filter is both NJDEP approved and Washington TAPE approved. The Kraken Filter is approved at 89% overall TSS removal under the NJDEP protocol. Under the TAPE protocol field testing the system removed 85% of TSS on average with a  $D_{50}$  particle size of 21 microns along with 72% average removal efficiency for total phosphorus. For individual storm events removal for total phosphorus exceeded 90%. 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.

Included is a completed Manufactured Treatment Device Registration form along with supplementary reports, data and documents to support the request for approval.

Please let me know if you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read "Zachariha J. Kent".

Zachariha J. Kent  
Vice President of Product Development & Regulatory Compliance  
Bio Clean Environmental Services, Inc.