



Commonwealth of Virginia

VIRGINIA DEPARTMENT OF ENVIRONMENTAL QUALITY

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Travis A. Voyles
Acting Secretary of Natural and Historic Resources

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Director
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April 20, 2022

Mr. Phillip Taylor
Hydro International
94 Hutchins Dr
Portland, ME 04102

Transmitted electronically ptaylor@hydro-int.com

Re: Assignment of Percent Removal Efficiencies for Total Phosphorus
First Defense® Optimum Vortex Separator

Dear Mr. Taylor:

The Department of Environmental Quality (Department or DEQ) received the Proprietary Best Management Practice (BMP) Registration Statement and supporting documentation for the **First Defense® Optimum Vortex Separator** on August 23, 2021. The Department has reviewed the application and supporting documentation in accordance with § 62.1-44.15:28 of the Code of Virginia, 9VAC25-870-65 D of the Virginia Stormwater Management Program (VSMP) Regulation, and DEQ Guidance Memo No. 21-2006.

Section 65 D 2 of the VSMP Regulation states, "Any proprietary BMP approved for use after July 1, 2020, must meet the requirements of § 62.1-44.15:28 A 9 of the Code of Virginia." The Department received the current general use level designation (GULD) certificate from Washington State's Technology Assessment Protocol – Ecology (TAPE) program or the current certification from the New Jersey Department of Environmental Protection (NJDEP) for the **First Defense® Optimum Vortex Separator**. The previously approved device, First Defense, has been included on the prior-approved list of proprietary best management practices (BMPs) on the Virginia Stormwater BMP Clearinghouse website.

The **First Defense® Optimum Vortex Separator** is approved for use in Virginia to meet the VSMP water quality design criteria requirements and has been assigned a total phosphorus pollutant removal efficiency of **20%**. This information will be posted on the Virginia Stormwater BMP Clearinghouse website. This device and the assigned removal efficiency can be manually added into the Virginia Runoff Reduction Method spreadsheet to demonstrate compliance with VSMP water quality design criteria requirements.

If you have any questions regarding this letter, please contact Robert E. Cooper, P.E. at (804) 965-4875 or e-mail at Robert.Cooper@deq.virginia.gov.

Sincerely

A handwritten signature in blue ink that reads "Erin Ervin Belt".

Erin Ervin Belt
Office of Stormwater Management