

Vermont Department of Environmental Conservation

Watershed Management Division
Davis Building, Third Floor
One National Life Drive
Montpelier, VT 05620-3522

Agency of Natural Resources

(phone) 802-828-1115

November 20, 2023

Advanced Drainage Systems, Inc.
4640 Trueman Boulevard
Hilliard, OH 43026
Attn: Aaron Cheever

RE: Advanced Drainage Systems, BaySaver Technologies BaySaver BayFilter with Enhanced Media Cartridge (EMC)
 Alternative Stormwater Treatment Practice - Request for Approval

Dear Mr. Cheever:

The Stormwater Program has reviewed the Advanced Drainage Systems, BaySaver Technologies BaySaver BayFilter with Enhanced Media Cartridge (EMC) as an alternative stormwater treatment practice through the evaluation process in Section 4.4.1 of the 2017 Vermont Stormwater Management Manual (VSMM).

Based on our review, we believe that Advanced Drainage Systems, Inc. has provided the Stormwater Program with testing data showing that the system provides total phosphorus and total suspended solids removal efficiency sufficient to meet or exceed the standards in the Vermont Stormwater Management Manual as a stand-alone Tier 2 Practice.

Please be advised that this letter serves as preliminary approval and does not constitute a final act or decision of the Secretary. Final approval of the use of ADS BaySaver BayFilter w/ EMC or other alternative practice is project specific and is necessarily done through the issuance of an operational stormwater permit, until such time that the Vermont Stormwater Management Manual is formally revised to include the practice.

In developing permit conditions for any project relying on the ADS BaySaver BayFilter w/ EMC the Stormwater Program is likely to include the following permit conditions and application requirements:

- 1) The ADS BaySaver BayFilter w/ EMC must be designed, assembled, installed, operated, and maintained according to the specifications of Advanced Drainage Systems, Inc., in the same configuration and at the same maximum treatment and hydraulic loading rate identified in the applicable testing protocol and associated reporting.
- 2) The system must be designed to accommodate 100% treatment of the requisite water quality volume through sizing for the peak rate of the water quality storm without bypass.

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- 3) The system must be designed in an off-line configuration using an upstream divergence structure and a downstream convergence structure.

As part of this preliminary approval, the product will be listed on the Vermont Department of Environmental Conservation's Alternative Practices website at <http://dec.vermont.gov/watershed/stormwater/permit-information-applications-fees/Alt-STPs>.

Until such a time that the practice is incorporated into the VSMM through rulemaking, projects utilizing the practice that are subject to operational stormwater permitting require an individual permit application.

If local jurisdictions or other parties request a copy of a letter from VT DEC verifying preliminary practice approval, please use this letter for that purpose.

Thank you for your interest in providing alternatives to the stormwater design community in Vermont. If you have any questions concerning this preliminary approval, please contact the Stormwater Program.

Sincerely,

Aaron Ferraro

Aaron Ferraro, Environmental Analyst
Vermont DEC – Stormwater Program