

6/25/2018

ACF Environmental - Convergent Alliance
2831 Cardwell Road
Richmond, VA 23234
Attn: Scott Gorneau

Dear Mr. Gorneau:

The Stormwater Program has reviewed the FocalPoint High Performance Modular Biofiltration System (HPMBS) 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 Convergent Water Technologies and ACF Environmental have 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 3 Practice, or as a Tier 1 Practice if designed with an infiltration chamber below the filter bed.

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 the FocalPoint® HPMBS, or other alternative practices, 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 FocalPoint® HPMBS, the Stormwater Program is likely to include the following permit conditions and application requirements:

- 1) The FocalPoint® HPMBS must be designed, assembled, installed, operated, and maintained according to the specifications of Convergent Water Technologies and/or ACF Environmental.
- 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, or otherwise shall be volumetrically sized to accommodate the entire applicable water quality volume.

6/25/2018

Preliminary Approval: FocalPoint Biofiltration System

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,

A handwritten signature in cursive script that reads "Terry Purcell".

Terry Purcell

Environmental Analyst, Vermont DEC Stormwater Program