Robert J. Huston, Chairman R. B. "Ralph" Marquez, Commissioner John M. Baker, Commissioner Jeffrey A. Saitas, Executive Director



## TEXAS NATURAL RESOURCE CONSERVATION COMMISSION

Protecting Texas by Reducing and Preventing Pollution

October 19, 2001

Mr. John R. Roy President Aqualogic<sup>TM</sup> 14093 Bulverde Road San Antonio, Texas, 78247

Aqualogic™ New Storm Water Filtration Technology Re: Technical Guidance Manual Insert Language for "Computer Controlled Cartridge Filter Systems" as a Best Management Practice (BMP)

Dear Mr. Roy:

The Texas Natural Resource Conservation Commission (TNRCC) has completed its review of the additional Technical Guidance Manual language for the approved BMP duly named "computer controlled cartridge filter system" for insertion into the TNRCC's Technical Guidance Manual for the Edwards Aquifer Protection Program. The TNRCC agrees that the 90% removal efficiency of the filter cartridge as described in media properties should remain as worded in the insert approved on April 17, 2001. However, the TSS removal efficiency (%) of the cartridge controlled filter system as a BMP should be stated as 95%.

The TNRCC will now include the language you provided as an insert to the section of the Technical Guidance Manual under Table 3.4 TSS Reduction of Selected BMPs. We will insert this new BMP material into the Technical Guidance Manual when it is revised and reprinted. In the interim, the TNRCC will provide this insert page as an addendum whenever the Technical Guidance Manual is provided to the public or regulated community.

If you have any questions or require additional information, please contact Bobby Caldwell of the Edwards Aquifer Protection Program of the San Antonio Regional Office at 210/403-4020.

Sincerely

Jeffrey A. Saitas, P.E., Executive Director

Texas Natural Resource Conservation Commission

JAS/bc

Enclosure:

Insert material, page 3-29, Section 3.3.4 TSS Removal Efficiency

Mr. Scott Halty, San Antonio Water System Mr. John Bohuslav, TXDOT San Antonio District Ms. Renee Green, Bexar County Public Works

Mr. Tom Hornseth, Comal County

Mr. Greg Ellis, Edwards Aquifer Authority

REPLY TO: REGION 13 • 14250 JUDSON RD. • SAN ANTONIO, TEXAS 78233-4480 • 210/490-3096 • FAX 210/545-4329

## 3.3.4 TSS Removal Efficiency

The available literature was reviewed to determine reported TSS removal rates in structural stormwater controls. The primary literature sources for this manual are Barrett et al. (1998b), Brown and Schueler (1997), Glick et al. (1998), and Young et al. (1996). The values shown in Table 3.4 represent percentage reduction in stormwater load for the runoff treated by the selected structural controls.

Table 3.4 TSS Reduction of Selected BMPs

BMP	TSS Reduction (%)
Retention/Irrigation	100
Ext. Detention Basin	75
Grassy Swales	70
Vegetated Filter Strips	85
Sand Filters	89
Wet Basins	93
Constructed Wetlands	93
Computer Controlled Cartridge Filter Systems	95

## 3.3.5 Removal for BMPs in Series

BMPs can be located in series to achieve the total TSS reduction required. The efficiency of each subsequent control would be expected to be less since the sediment that is most easily removed is captured in the first control; consequently, Equation 3.7 will be used to calculate total efficiency of BMPs in series:

Equation 3.7 
$$E_{Tot} = [1 - ((1 - E_1) \times (1 - 0.8E_2) \times (1 - 0.3E_3))] \times 100$$

Where:

 $E_{Tot}$  = Total TSS removal efficiency of BMPs in series (%)

 $E_I$  = Removal efficiency of first BMP (decimal fraction)

 $E_2$  = Removal efficiency of second BMP (decimal fraction)

 $E_3$  = Removal efficiency of third BMP (decimal fraction)