

FIRE PREVENTION SERVICES

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State Water Resources Control Board
North Coast Region
Robert E. Anderson
5550 Skyland Blvd., Suite A
Santa Rosa, CA 95403

Dear Mr. Anderson:

As a commercial fire sprinkler contractor with more than 25 years in the business, I am writing concerning a long-standing water quality issue that has yet to be addressed by the California EPA or its state and regional Water Resource Control Boards. The issue is commercial fire sprinkler discharge, a problem that must be addressed because if left unattended, it will continue to consign billions of gallons of polluting wastewater to California waterways and ground water.

Federal and state laws require that commercial buildings install fire suppression systems the majority of which include standard ceiling sprinklers. These systems are seldom used, resulting in water typically sitting in piping for five years, or until required testing results in its discharge. During that time, harmful pollutants such as chemicals, rust, oils, disease-causing agents, nitrates, minerals and bacteria build up in the standing water and are discharged onto open surfaces and into storm drains.

It has been estimated that sprinkler technicians flush about 2.35 gallons of water per square foot through piping during testing. California has roughly 460,000 to 550,000 commercial buildings containing between 6.6 billion to 7.0 billion square feet of space (based on extrapolations from the Energy Information Administration report *Overview of Commercial Buildings 2003*). At 2.35 gallons per square foot, about 2.9 billion to 3.2 billion gallons of polluted water are discharged from buildings every year. The vast majority of this amount drains into our oceans and waterways while the remainder is left to percolate into the water table, a source of fresh water for many cities.

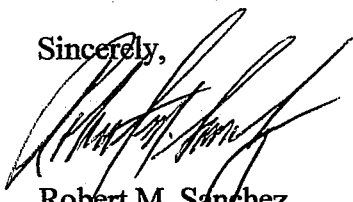
Several California municipalities, in compliance with Federal Clean Water Act and the NPDES, require sprinkler technicians to capture polluted fire sprinkler discharge at the source and to transport it to purification centers. Moreover, there are other emerging developments that are more portable, easier to use and capable of processing water at the source. They include the newly developed portable water cleaning process of Hydro(gen) Innovations Inc. and Abtech Corporation's Smart Sponge called the *EcoSmart Filter* which is used in draining maintenance.

Given that there are newer technologies and easier means for fire sprinkler companies to contain and clean polluted water, it is imperative that the California EPA and Water Quality Boards move to the next step – mandating building owners and managers and fire sprinkler technicians to clean polluted water before discharging it into public storm drain systems. This would also require ensuring that there is oversight and authority to cite and prosecute so that laws are being met and that those involved are acting within the requirements of state law.

As a fire sprinkler contractor I believe wholeheartedly that I have a responsibility to maintain a clean environment and clean waterways. I fully support any actions by the California EPA and Water Resource Control Boards to ensure there are fewer pollutants affecting the sea, rivers and ground water.

I would be happy to discuss this matter with you. Please feel free to call me at any time. Thanks in advance for your help.

Sincerely,



Robert M. Sanchez
President
Fire Prevention Services

cc: California State and Region Water Resource Control Board Members