

**AbTech Pacific Inc.**  
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Ms. Song Her  
Clerk to the Board  
Executive Office  
State Water Resources Control Board  
P/O. Box 100  
Sacramento, CA 95812-0100

August 3, 2006



Re: In the matter of ASBS Special Protections

AbTech Pacific is the California based distributor of stormwater treatment products produced by AbTech Industries, Inc., including:

- (1) Ultra-Urban® Filter (UUF) with Smart Sponge® Plus anti-microbial technology for catch basin inserts and
- (2) Smart Sponge Vault with Smart Sponge Plus anti-microbial technology to treat storm water at the end of pipe discharges going directly into the ocean.

Based on direct field experience over the last several years, each UUF is capable of consistently reducing bacteria in storm water 40% - 99% based on a number of watershed parameters.

The Smart Sponge Plus anti-microbial technology can be the key component in any number of processes that assist in meeting AB411 standards for bacteria in effluent. This can be attained at reasonable costs; i.e. - a standard California curb opening catch basin, with the 3 to 15 Ultra Urban Filters (UUF), is about \$1000/UUF-installed and an end-of-pipe retrofitted with a Smart Sponge Vault is \$4000-\$20,000 depending on volume and pipe configuration discharging into the ocean.

AbTech recommends that municipalities use UUFs in catch basins throughout their watersheds to clean stormwater and control bacteria as close to the source as possible and to utilize Smart Sponge Vaults to further clean the stormwater and destroy bacteria immediately prior to discharge into the ocean.

AbTech would be pleased to present to the Board independent third-party verification of its products and their anti-microbial properties, which have undergone extensive utilization and field testing in Long Beach, CA, Norwalk, CT, and Scarborough Beach, RI.

The purpose of this filing, however, is to urge the Board to adopt strict bacteria standards for all discharges of storm water into ASBS. Municipalities can meet strict standards at reasonable cost by deploying AbTech Industries anti-microbial Smart Sponge Plus technology.

Respectfully Submitted,

Thomas Houston  
President