



69. Paratransit

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State Water Resources Control Board
1001 I Street
P.O. Box 100
Sacramento, California 95812-0100

February 8, 2005

Attention: SWRCB

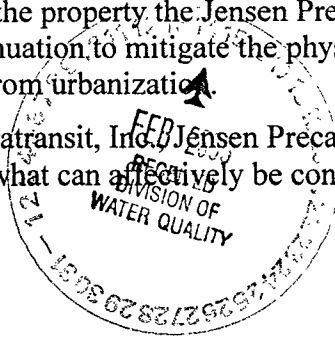
In response to the public hearing held February 3, 2005, the following comments are submitted for your consideration.

1. In the previous draft proposal a provision was included to reduce sampling requirements for individual permit holders, provided minimum discharge pollutant standards were met. Why was this proposed change, found in section B.12.b of the previous draft, removed?
2. The fee for the general permit increased by more than 100% this reporting year. Are there more services being provided with these additional fees? What types of additional services will be made available to the business owners that maintain compliance with the permit requirements? Will these additional fees be used for identifying noncompliant businesses?

Paratransit, Inc., has been a leader in supporting environmentally friendly technologies. Paratransit, Inc., has a storm water treatment device known as the Jensen Precast Stormvault installed under the bus parking lot. This additional BMP has resulted in a decrease in storm water pollutants discharged from our property by as much as 47.5% for Specific Conductance. Total suspended solids as well as Hexane Extractable Material are not detected, and TOC has decreased from 41 to 3.3 since grab sampling has been performed at the vault's sampling manhole.

In addition to the reduction in pollutants leaving the property the Jensen Precast Stormvault is designed to provide peak flow attenuation to mitigate the physical and ecological effects on receiving water that result from urbanization.

In an agreement with the City of Sacramento, Paratransit, Inc., Jensen Precast, and Wrightwater Engineering collaborated to install what can effectively be considered a storm water treatment and mitigation device.




Additionally Paratransit, Inc., has a written agreement with the City of Sacramento's Department of Utilities to maintain the Stormvault per the manufacturer's recommendations, and to allow access to the Stormvault upon the City's request.

The Stormvault's sediment levels are checked quarterly. When the combined sediment levels of any chamber average six inches, that chamber is to be pumped out. All sediments are handled, transported, and disposed of in accordance with Sacramento County Hazardous Materials regulations. Oil absorbent pillows are checked quarterly and replaced when they become dark gray/black. The intake strainer is checked annually for debris. Any accumulated debris is removed.

Please recognize that organizations investing in significant BMP's, as Paratransit, Inc., has, should be recognized for their efforts in storm water pollutant reduction, by reducing the current required frequency of sampling.

If you have questions regarding any information or comments made, please feel free to contact me at bethbh@paratransit.org.

Thank you,


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