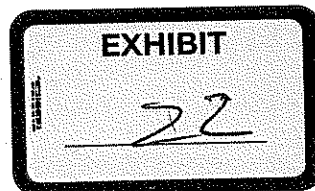


# CONNECTICUT WATER POLLUTION ABATEMENT ASSOCIATION

P.O. Box 873 Plainville, CT 06062-0873



February 1, 2010

Ms. Denise Ruzicka  
Department of Environmental Protection  
Bureau of Water Protection and Land Reuse  
Planning & Standards Division  
79 Elm Street  
Hartford, Connecticut 06106-5127

Dear Ms. Ruzicka:

The Connecticut Water Pollution Abatement Association (CWPA) is concerned with the potentially profound impacts on the state's POTWs that are inherent in the proposed revisions to the state's Water Quality Standards that were public-noticed on December 22, 2009. We respectfully request that the Public Hearing either (1) be delayed to allow for release by DEP of relevant information for our constituency to review so that they may provide meaningful comment; or (2) that the hearing be continued for a period of 60-days after release of said information.

While the proposed changes were published on December 22, 2009, back-up information has not been provided and outreach per DEP's usual standard has not occurred. Our concern centers on the fact that there has been little outreach by DEP about these proposed changes, yet the changes may have profound impacts on future NPDES permits when re-issued. In addition, these revisions may have enormous cost implications for many facilities. We do not necessarily oppose the revisions, but all the information necessary to evaluate the changes and provide meaningful comment has not been made available. A few specific concerns regarding the proposed revisions are:

- Establishment of strict thermal criteria in receiving streams: it is unclear how this will be administered, how the limits of receiving water reach will be defined, or what is the basis for justifying the criteria, among other questions
- Changes to the numeric criteria in Appendix D for many pollutants for which standards had been previously developed: it is unclear why the changes are being proposed and the basis for establishing new limits on many criteria
- Establishment of new criteria for many other pollutants: this will effect many treatment facilities that may not have the ability to meet the standard

- Formalize nutrient reduction strategy for phosphorus: it is our understanding that the USEPA has not completely signed-off on DEP's program for phosphorous reduction, thus it appears to be pre-mature to adopt the strategy into the Water Quality Standards

The Connecticut DEP has a well-earned reputation established over many years of reaching out to municipalities in general and operators in particular during the development of regulations that impact municipal treatment plants. We urge you to continue this tradition by delaying the public hearing until detailed technical information is made available for us as operators to review and provide you with meaningful comment. To repeat, we respectfully request:

1. That the Public Hearing be delayed to allow for release by DEP of relevant information for our constituency to review so that they may provide meaningful comment; or
2. That if the hearing is opened on February 3, that it be continued for a period of 60-days after release of said information, and then re-convened for our constituency to have an opportunity to present their comments.

The Board of Directors of CWPAA as well as the members of our organization welcomes this opportunity to work with DEP in improving the water quality of Connecticut's waters. Thank you for your attention.

Sincerely,

Carl Almquist  
President, CWPAA

Cc: Ms. Betsey Wingfield  
Ms. Traci Iott