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From: Rivers Alliance of CT <rivers@riversalliance.org>
Sent: Friday, April 05, 2019 5:38 PM
To: DEEP WQS
Cc: Rivers Alliance
Subject: WQ Standards supplemental comments

The definition of BMPs is weak. The definition is used widely, and should be more precise.. What does "institutional feasibility means"? Could we have an example. Basically, this definition says: BMPs are anything the commissioner says they are if so long as they reduce pollution by at least a little bit.

"Best Management Practices" means those practices which reduce pollution and which have been determined by the Commissioner to be acceptable based on, but not limited to, technical, economic and institutional feasibility.

What is the difference between the standard of "technical ... feasibility" here and the standard of "technically practicable" ? See below.

The definition of "technically practicable" is vague. What are "sound" practices. Are they different from the "feasible" practices in the BMP definition?

62) *"Technically Practicable" means with respect to ground water remediation, the greatest degree of remediation that can be achieved using sound engineering and hydrogeologic practices.*

In "Purpose and Goals," number 1 is ambiguous.

(1) provide clear and objective statements for existing and projected water quality and the general program to improve Connecticut's water resources;

Throughout, I have difficulty understanding when a wq standard is describing a existing condition, when it is describing a goal, and when it is describing "projected" conditions, which could be higher or lower than existing condition, unless perhaps by "projected" you mean "projected as a goal.

I urge DEEP to return to the clear distinction between existing conditions and the goal, for example, SB/SA.

Environmental Criteria -- Surface Water Quality Criteria

Rivers Alliance questions:

1. As the WQS are being updated, is this the time to add emerging contaminants such as PFAs, pharmaceuticals, synthetic microfibers to these criteria?
 2. There are 17 locations below sewage treatment plants with site specific standards for Copper much higher than everywhere else. Has the technology advanced to the point that these sections of rivers can now be protected fully?
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Lake trophic categories

Should thermal characteristics be added to Total Phosphorus, Total Nitrogen, Chlorophyll-a, and Secchi Disk Transparency when assessing the trophic state of a lake?

Sec. 22a-426-7. Ground waters

Is this still a reasonable way to describe carcinogen risk? What if it's only a probable human carcinogen? What about fish that swim in the water that came from the ground?

"(B) is a carcinogen present at a concentration associated with a 1×10^{-6} excess cancer risk;"

Sec. 22a-426-8. Antidegradation standards and antidegradation implementation policies

Has CT designated any Outstanding National Resource Waters? Should more be so designated if it will better protect them?

Why is management of just the first inch of rainfall a Best Management Practice. Given increased storm intensity, is the first inch enough?

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