

THE MATTABASSETT DISTRICT
NEW BRITAIN - BERLIN - CROMWELL - MIDDLETOWN
REGIONAL SEWER AUTHORITY

ARTHUR G. SIMONIAN, P.E., LEED
EXECUTIVE DIRECTOR

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March 19, 2019

Bureau of Water Protection and Land Reuse
CT Department of Energy and Environmental Protection
79 Elm Street
Hartford, CT 06106-5127

RECEIVED

APR - 9 2019

Bureau of Water Protection and Land Reuse
Water Planning & Management Division

RE: Public Comments on Water Quality Standards Revision

Dear Madam/Sir:

The Mattabassett District (The District) is respectfully submitting this written response to The Connecticut Department of Energy & Environmental Protection (The Department), to voice our concern for the Department's position in proposing to revise the Connecticut Water Quality Standards (WQS) to include extending the disinfection period of treated sewage (by POTW's) located north of Highway I-95, from currently May 1st through October 1st TO revised April 1st through November 1st.

The District, a POTW, is located north of Highway I-95, and currently discharges treated effluent to the Connecticut River at the Cromwell/Middletown town line. The District is currently required to disinfect between the months of May 1 to October 15th. In 2018, the District annual cost for disinfection was approximately over \$4,500.

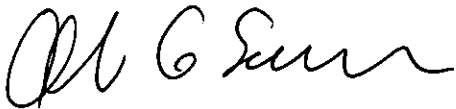
While the proposed revision would include language that would consider a POTW's request and approval for an alternative disinfection schedule, the District would request that the Department determine those POTW's currently discharging to the CT River and evaluate specific recreational activities conducted in the additional months being considered (to be included for disinfection), and evaluate the specific need for such a revision. The evaluation may determine that not only adding two additional months of disinfection may not be required, but it will save POTW's cost for disinfection. For the District this would result in a savings of just over \$1,300 per year. In addition, the District recently requested, under the NPDES renewal application, a revision to reduce our disinfection season from October 15th to October 1st, as supported by reduced recreational activity in the CT River during this period of time. To extend the disinfection period without the increased recreational activity during

this period of time would incur additional disinfection costs ultimately borne by taxpayers of the Mattabasset District.

The District therefore, respectfully requests the Department to consider our concern for saving operational dollars by not extending the disinfection period where it is not warranted.

Please feel free to contact me at (860)635-5550, should you have any questions.
Sincerely,

THE MATTABASSETT DISTRICT

A handwritten signature in black ink, appearing to read "A G Simonian". The signature is fluid and cursive, with the first letters of each word being capitalized and prominent.

Arthur G. Simonian, P.E.
Executive Director

c: John Dunham, P.E., District Board Chairman
Michelle Ryan, P.E., District Engineer
Michael Manfre, Operations Manager