



Comments on the DRAFT MISC General Permit

1. Is "filtration" for suspended solids considered treatment? If it is considered treatment then it creates unnecessary burden of O&M Plan and Spill Plan for a minor piece of treatment equipment.
2. What category of wastewater will include wastewaters generated from washing of laboratory equipment at medial facilities and/or laboratories at educational institutions? Is this wastewater regulated by DEEP?
3. Laboratories at medical facilities (hospitals) generally have a failsafe pH adjust systems for treating of occasional slugs of wastewater from various laboratories. Is this discharge and treatment process regulated under the MISC General Permit
4. Section 5(b)(7)

(7) Sample Type

(A) For a discharge less than or equal to 10,000 gpd, a sample taken for the purpose of determining compliance with the effluent limits in Table 5-1 of this general permit shall:

(i) Be a grab sample which consists solely of the MISC wastewater category whose discharge is authorized by this general permit; or

(ii) Be a **flow proportional** composite sample which consists of any combination of MISC wastewater grab sample categories; and

(iii) Be representative in all respects, including without limitation chemically and thermally, of the sampled wastewater during routine operating conditions. Where multiple sources of a specific category of MISC wastewater are generated at a site, a **flow proportional composite** ~~only one~~ sample from **multiple sources of same category of MISC wastewater** ~~a single representative source~~ is required.

(B) For discharges greater than 10,000 gpd from a single pipe, excluding **and prior to combining with** non-contact cooling water, water treatment wastewater and hydrostatic pressure testing wastewater, samples shall be composite with aliquots taken at intervals of at least once every four hours over a full operating day.

5. Section 4(c)(2)

(2) Registration Form

A registration shall be filed on forms prescribed and provided by the commissioner **or POTW** and shall include but not be limited to the following:

6. In accordance w/ Table 5-3 of the draft MISC GP, footnote 1:

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Discharges that do not have a prescribed monitoring frequency must comply with the effluent limits of Section 5(a)(1) of this general permit. The permittee should maintain records of monitoring data that the permittee believes is representative of the current discharge.

Does this mean that Group I discharges less than 1,000 GPD (and Group II discharges less than 10,000 GPD) are required to be sampled to make sure these discharges meet the effluent limits?

7. Section 4(c)(2)(O)

For existing discharges only, one screening analysis from the testing of a sample taken within ninety (90) days of registration or the most recent sampling event for pollutants specified by Section 5(b)(1) of this general permit shall be submitted with the registration form.

Do all categories and/or Groups of wastewaters need to be screened? Are wastewaters with flow <1000 gpd excluded from sampling?

8. Per Table 4-1 of the Draft MISC GP there are no exemptions from registration and all categories of wastewaters within both Groups need to be registered with the POTW. This will require a large pool of facilities to register with the POTW that are currently exempt from registration. The current MISC GP excludes facilities from registering with DEEP for flows (<1000 for Group I, <5000 for Group II and all flows for Group III). We recommend that this exclusion be included in the updated permit.

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