Via Electronic Mail

February 13, 2019

James Creighton
WPED
CTDEEP
79 Elm Street
Hartford, CT 06106-5127

Re: Draft General Permit for Discharges of MISC Wastewater from Industrial Users

Dear Mr. Creighton:

Included herein are my comments on the Draft General Permit for Discharges of Miscellaneous Sewer Compatible (MISC) Wastewater from Industrial Users that was issued for public notice on January 14, 2019.

Comments

1. Section 3(b)(8): This section says that one of the requirements for authorization is that "The registrant has certified in writing to the applicable POTW Authority that a completed copy of the registration has been submitted and has received written approval from such authority to discharge to the POTW." Please clarify what the procedure is here. Does this mean that after submitting a registration and receiving written approval from the POTW, the registrant then has to send some written certification back to the POTW stating that it submitted a registration and it was approved by the POTW. What is the purpose of this? Is there a form for this?

2. Section 4(a)(1)(A): I don't believe that water treatment wastewater discharges such as ion exchange regeneration wastewaters and activated carbon and filter media backwashes or reverse osmosis reject water meet the definition of process wastewater in RCSA 22a-430-3(a)(3) when the water being treated is city water at a company whose primary business is not to purify water for sale. I don't see how the treating of city water is coming into direct contact with, or resulting from the production, used or handling of any process, raw material or intermediate or final product, byproduct or waste product. I am familiar with ion exchange water softeners being used to treat city water prior to being used in a boiler system and for filters, carbon, and/or reverse osmosis being used in facilities such as hospitals, colleges, and universities to generate pure water for use in dialysis and/or laboratories. These units are then backwashed/regenerated with city water. There are no chemicals added to these treatment units. The only contaminants/parameters discharged to the sewer during the backwash/regeneration operations are the same contaminants/parameters that were in the city water that was treated. Boilers, cooling towers, and fire suppression systems are using and discharging the same city water, and many times having chemicals added such as biocides, corrosion inhibitors, antiscalants, etc. but these discharges are considered non-process wastewaters.

3. Section 4(a)(1)(A) and (B): For "Other process wastewaters" and "Other non-process wastewaters", does the CTDEEP need to make the determination as to whether or not a particular discharge falls into one of these two categories or is it up to the POTW, the registrant,

and/or a Qualified Professional Engineer or Qualified Certified Hazardous Materials Manager to make this determination?

4. Table 5-3: If ion exchange regeneration wastewaters and activated carbon and filter media backwash wastewaters from units used to treat city water are kept as Group I process wastewater discharges in the general permit, it is requested that they put into the same group as Food Processing, Commercial Laundry, and Reverse Osmosis Reject Water with no monitoring requirements for flows <25,000 gpd, since these wastewaters do not contain anything other than what was in the city water that entered these treatment units.

5. Section 5(b)(7)(A)(ii): How is "composite sample" defined?

6. Section 5(e)(4): Does this section apply only to the Collection AND transport of wastewater or would the collection/holding tank requirements apply to a facility that might collect/hold the wastewater temporarily prior to discharging directly to an onsite sanitary sewer connection?

7. Section 5(e)(4)(B)(v): This section says that "the holding tank shall be equipped with a high-level alarm system clearly audible in the normal working range of responding personnel." The last section of this sentence states "At a minimum, the holding tank shall be equipped with a means to determine/verify the wastewater level, including but not limited to sight glass and level indicator devices." If the holding tank meets the minimum requirements in the last sentence of this section, does it also need to be equipped with a high-level alarm system clearly audible in the normal working range of responding personnel?

8. Section 5(e)(4)(B)(v): Can the first sentence of this section be reworded to allow for the use of other equivalent overfill prevention devices/procedures acceptable to the POTW and Qualified Professional Engineer in lieu of an audible high-level alarm?

9. Appendix A – General Definitions: Would the wastewater from a lab at a hospital (e.g., histology, hematology lab, etc.) or at a college/university (e.g., chemistry lab), for example, fall under the definition of "Laboratory Wastewaters"? If not, would these laboratory wastewater discharges be considered a process or a non-process wastewater?

10. Appendix A – General Definitions: In my experience, many facilities conduct annual cleaning / power washing of their cooling towers to remove biological growth, scale, etc. Would the wastewater from this operation be "facility and equipment cleaning rinsewaters" under the definition of "Water treatment wastewaters or WTW", "Other process wastewater", or "Other non-process wastewater"?

Thank you for your consideration of these comments.

Sincerely,

Gilbert S. Ryan

Gil Ryan