



City of Bristol
Water Pollution Control
Bristol, Connecticut 06010

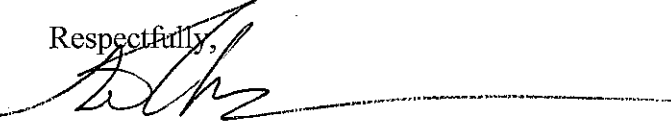
2/14/2019

James Creighton
WPED, DEEP
79 Elm Street
Hartford, CT 06106-5127
james.creighton@ct.gov

Dear Mr. Creighton,

After reviewing the proposed changes to the Industrial and Pretreatment Programs, the City of Bristol has concerns with respect to feasibility, staffing, and funding. Under the proposed changes relating to the Miscellaneous General Permit, four groups of discharges are identified. Discharges ranging from boiler blowdown to reverse osmosis reject water; feasibility concerns are the burden on POTW's to review registrations, permit, manage and enforce many of the Group Discharges I: IV that do not pose loading interference of treatment at the POTW. Adequate staffing of POTW's over the past decade and beyond has been and will be difficult to maintain and is expected to become more problematic due to financial constraints cities and towns face as well employee attrition through retirement. The proposed changes create an Unfunded Mandate that puts a financial burden on our department and the City of Bristol while present staffing is not adequate to comply with the miscellaneous discharges of sewer compatible wastewater proposed changes.

Respectfully,


Sean Hennessey
WPC Manager
Bristol, CT 06010
(860)-584-3821

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