

From: [Pease, Rich](#)
To: [Creighton, James](#)
Subject: FW: GP for Discharges of Sewer Compatible Wastewater from Industrial Users
Date: Thursday, February 14, 2019 2:15:57 PM
Attachments: [image003.jpg](#)
[image004.jpg](#)

Jim, one more comment on the Draft GP for Discharges of Miscellaneous Sewer Compatible Wastewater from Industrial Users:

With regard to footnote 1 at the bottom of Table 5-3, is this interpreted to mean that annual (or some other frequency) of discharge sampling and analysis is required? Please clarify:

1 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.

Thanks,

Richard Pease

Department of Correction

Engineering Services

24 Wolcott Hill Road

Wethersfield, CT 06109

Phone: (860) 692-7562

Fax: (860) 692-7556



From: Pease, Rich

Sent: Thursday, February 14, 2019 1:55 PM

To: Creighton, James

Subject: GP for Discharges of Sewer Compatible Wastewater from Industrial Users

Jim, these are my comments on the Draft GP for Discharges of Miscellaneous Sewer Compatible Wastewater from Industrial Users:

1. Section 4, (c), (1), (A) – With regard to registration fees, is the intent of the GP to leave it so open ended that a POTW Authority can change whatever they want? How will a POTW Authority determine what the registration fees will be? Is the intent of the GP to allow different POTW Authorities to charge different registration fees? This would create confusion for facilities that have locations in multiple towns. It seems to make more sense that the POTW Authorities and DEEP should get together to create a registration fee schedule.
2. With regard to any registration fee schedule, reduced rates should be considered for state agencies and municipalities (assuming all state agencies and municipalities are classified as industrial users?).
3. Section 4, (h), (1) – The last sentence should be deleted: ~~Any registration refiled after such a rejection shall be accompanied by the applicable fee as determined by the POTW Authority.~~ The registration fee should be a one-time submittal at the time of initial registration. A

registrant should not have to pay an additional fee to re-submit the registration after rejection.

4. The definition of "Industrial User" should be expanded. Are all state, municipal, and federal agencies, state/federal/private institutions, municipalities, hospitals, commercial establishments, etc. classified as industrial users and subject to the permit requirements?

Please let me know when the response to comments is available.

Thanks,

Richard Pease

Department of Correction

Engineering Services

24 Wolcott Hill Road

Wethersfield, CT 06109

Phone: (860) 692-7562

Fax: (860) 692-7556

