

South Central Connecticut Regional Water Authority
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February 14, 2019

Mr. James Creighton
Bureau of Materials Management and Compliance Assurance
Department of Energy and Environmental Protection (DEEP)
79 Elm Street Owned Treatment
Hartford, CT 06106-5127

RE: Comments on Draft General Permit for Miscellaneous Discharges of Sewer Compatible (MISC) Wastewater

Dear Mr. Creighton:

The South Central Connecticut Regional Water Authority (RWA) is a non-profit public corporation and political subdivision of the State. Within the 20 member towns of our water district, we own and operate a public water system that includes 10 active reservoirs, four surface water treatment plants and seven ground water treatment plants. We serve an estimated 430,000 water consumers an average of about 45 million gallons of water per day and provide fire protection throughout our service area. The source of this water is a system of watershed and aquifer areas that cover approximately 120 square miles in the south central Connecticut region.

The RWA appreciates this opportunity to comment on the Connecticut Department of Energy and Environmental Protection's (CT DEEP) proposal to reissue with modification the General Permit for Miscellaneous Discharges of Sewer Compatible (MISC) Wastewater. While the Committee understands CTDEEP needs to work with the Publicly Owned Treatment Work (POTW) Authorities to transition the permit into its new form, we believe the draft language is premature and should be properly vetted to ensure that the regulated community is provided with a permit that is clear and understandable. The RWA's comments are as follows:

1. The current draft general permit language contains many examples of errors associated with typical "cut and paste" edits. It is recommended that the CT DEEP correct these errors and reissues a new draft for review.
2. Upon changing the approving authority from CT DEEP to the POTW authority the following registration requirements no longer make sense:
 - Paragraph 3(b)(8) requires the registrant to certify 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.
 - For Facility and Treatment System Modifications, Paragraph 5(e)(3)(A)(vi) requires the submission of approval by the applicable POTW Authority for connection to a POTW.
3. The draft general permit needs to include definitions of both "process" and "non-process" wastewater.

4. Section 4(c)(2)(N) requires existing discharges covered under the current MISC to provide a copy of the existing POTW approval with their registration and Section 3(b)(8) requires the registrant to certify in writing that a completed copy of the registration has been submitted to the POTW. It is unclear why both of these are required for existing discharges. Since the registrations are being submitted to the POTW Authority, they will know the discharge was previously approved.
5. Treatment System Modifications - Section 5(e)(3) is very confusing. The Section references Group II wastewater but then also makes reference to photographic processing wastewater, which is a Group I discharge. Section 5(e)(3)(A) references Section 4(c)(2) but should reference 4(e), Modified Registrations. The provisions of this section do not appear to align with the requirements for a modified registration in Section 4(e). Also, it is unclear why an approval for connection to a POTW (5(e)(3)(A)(vi)) is required when submitting a request to the POTW for a treatment system modification.
6. Section 5(f)(12)(B)(xii) indicates an inspection form is included as Attachment A of the General Permit. Is CTDEEP developing the inspection log or will each POTW authority add its own log?
7. We recommend that the General Permit provide some guidance for situations where the registrant should file under the General Permit for Discharge of Wastewaters from Significant Industrial Users.
8. We request that if CTDEEP has discussions with the POTW Authorities that result in modifications to the General Permit, a second comment period is offered to allow the regulated community an opportunity to comment on the changes before they are finalized.

Thank you for the opportunity to comment. If you have any questions, please do not hesitate to contact me at avelasquez@rwater.com or call (203) 401-2734.

Sincerely,

REGIONAL WATER AUTHORITY



Amy L. Velasquez

Environmental Compliance Analyst