

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 the Discharge of Wastewaters from Significant Industrial Users (SIU)

Dear Mr. Creighton:

The Connecticut Section of the American Water Works Association (CT Section) is an organization comprised of more than thirty Connecticut drinking water utilities that provide water to approximately 2.5 million consumers in the State. The objective of our organization is the advancement of knowledge concerning the practices of water works construction, operation, and management in order to assist Connecticut water utilities with providing a safe and adequate drinking water supply to the public.

On behalf of the CT Section, the CT Section Residuals Committee (Committee) appreciates this opportunity to comment on the Connecticut Department of Energy and Environmental Protection's (CTDEEP) draft General Permit for the Discharge of Wastewaters from Significant Industrial Users (SIU).

1. The Eligible Activities in Section 3(a) need to be clarified and better aligned with the definition of SIU. For example, there is currently no mention of non-process wastewater in the definition of SIU.
2. Please provide further guidance and clarification in Section 3(e)(2) and 3(e)(3) regarding the Effective Date of Authorization for eligible activities previously permitted by other General Permits (as listed in the SIU).
3. The General Permit is requiring an Operation & Maintenance Plan (O&M) and Spill Prevention and Control Plan (SPCP) for all permits when the current General Permit for Discharges of Miscellaneous Sewer Compatible (MISC) Wastewater from Industrial Users only required these plans for discharges that required treatment. These plans can be expensive and time consuming to prepare and should not be required except when necessary.
 - In addition, the requirements for both the O&M Plan and SPCP plan are too prescriptive given the variety of processes covered by the General Permit and understanding that a Qualified Professional Engineer or Qualified Certified Hazardous Materials Manager is certifying that the O&M and SPCP Plans are adequate to assure that the activity will comply with the terms and conditions of the General Permit.
 - The requirement for the SPCP in the SIU is overly inclusive as it covers, "storage, collection, transfer, transport, treatment, loading and unloading of all toxic or hazardous substances, oils, process wastewaters, solvents and any other chemicals". Most chemical and waste management regulations provide some size threshold and avoid using general terms like "any other chemicals".
 - Also, as water treatment wastewater is being covered as a process wastewater and based on this language it would have to be included in the SPCP as well. This is unnecessary as spill prevention was included in the original design reviewed by the Department of Public Health.
4. CTDEEP should provide clarification as to why Table 5B-3 includes flows that are not eligible activities under the SIU GP. For example, according to the definition of a SIU, this General Permit is for discharges

of process wastewaters of 25,000 gallons per day (gpd) and greater but Table 5B-3 shows flows from less than 1,000 gpd to greater than 10,000 gpd. This causes confusion as to whether the SIU or MISC permit should be used.

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,

CT Section AWWA Residuals Committee

A handwritten signature in cursive script that reads "Amy L. Velasquez".

Amy L. Velasquez
Committee Co-Chair