

James Creighton  
Water Permitting & Enforcement Division  
Connecticut Department of Energy and Environmental Protection  
79 Elm Street  
Hartford, CT 06106-5127

Mr. Creighton –

Kleen Energy proposes the following comment with respect to the proposed General Permit for the Discharge of Wastewater from Significant Industrial Users:

Under Section 5.(c)(1)(A), *Timeline for Commencement of Electronic Reporting using netDMR*, once a permittee has submitted a sufficient CT DEEP NetDMR Subscriber Agreement, NetDMR can only be used once the role and access to the permit is then granted to the permittee.

The permit language as written in Section 5.(c)(1)(A)(ii) will create a non-compliance situation when a permittee has submitted a sufficient CT DEEP NetDMR Subscriber Agreement, but has not yet been granted role and access to the permit, which is of course out of the control of the permittee. This could occur during initial registration under the General Permit, and can also occur when there are personnel and/or Signatory Authority changes at the permittee, necessitating approval of a new NetDMR Subscriber Agreement.

Therefore, please consider adding language to avoid this potential non-compliance situation; proposed language is provided below:

Section 5.(c)(1)(A) Current Language

- ii) Unless otherwise approved in writing by the commissioner, no later than one-hundred and twenty (120) days after the approval of registration for coverage under this general permit, the permittee shall begin reporting electronically using NetDMR.

Section 5.(c)(1)(A) Proposed Language

- ii) Unless otherwise approved in writing by the commissioner, no later than one-hundred and twenty (120) days after the approval of registration for coverage under this general permit, **and once the permittee has been granted appropriate NetDMR role and access to their permit**, the permittee shall begin reporting electronically using NetDMR.

We believe this language change will eliminate a potential non-compliance situation, and while a permittee is awaiting NetDMR access, the remaining language in Section 5.(c) will allow a permittee to submit hard copy DMRs to the Department.

Sincerely,

Jason P. Farren, PE  
Compliance Coordinator  
Kleen Energy Systems, LLC.