



February 13, 2019

Sent by first class and electronic mail to:
james.creighton@ct.gov

Mr. James Creighton
CT Department of Energy and Environmental Protection
WPED
79 Elm Street
Hartford, CT 06106-5127

Re: Draft General Permit for the Discharge of
Wastewaters from Significant Industrial Users (SIU)

Dear Mr. Creighton:

The Connecticut Business & Industry Association (CBIA), through its Energy and Environment Council, appreciates this opportunity to submit comments on the above referenced draft general permit issued by the Connecticut Department of Energy and Environmental Protection (DEEP).

CBIA recognizes and appreciates DEEP's need to further streamline its permit operations and find creative solutions to ensuring protection of the environment in a manner that is efficient for the agency, industry and affected municipalities.

According to the Notice of Determination, the draft permit is intended to incorporate the current requirements of the General Permit for the Discharge of Wastewaters from Categorical industrial Users of a Public Owned Treatment works (POTW) (Categorical general permit) with requirements from the General Permit for Miscellaneous Discharges of Sewer Compatible Wastewaters that will apply only to Significant Industrial Users.

Under separate cover, CBIA has submitted comments regarding proposed modifications to the latter general permit. Regarding the above referenced SIU general permit, we offer the following suggestions:

Waivers

CIBA requests the draft be modified to more clearly define the sampling requirements for obtaining a waiver.

Notice of modifications

CBIA requests language be inserted clarifying whether DEEP expects a notification even if the facility modifications do not meet any of the three conditions listed in Section 5(c)(3)(A)

Definitions

The draft general permit should include a definition for "treatment" such that all municipalities have a clear and unified understanding of the term. An example of where this could be a problem is in the area of adjusting pH. Does DEEP consider pH adjustment "treatment", and thus requiring third-party certification?

CBIA requests clarification as to whether maintenance wastewater is considered a 'process wastewater' under this draft general permit. Such wastewaters are included in the 'process wastewater' definition in the Fact Sheet on page 1 – but not elsewhere in the fact sheet or in the draft general permit.

Thank you again for this opportunity to provide comments.

Sincerely Yours,

A handwritten signature in black ink, appearing to read "Eric J. Brown". The signature is fluid and cursive, with a long horizontal stroke at the end.

Eric J. Brown
Vice President