

From: [Geier, Patrick A](#)
To: [Creighton, James](#)
Subject: Comment re. GP for Discharge of Wastewater from Significant Industrial Users (SIU) <<Not-Sensitive>>
Date: Thursday, February 14, 2019 4:13:48 PM

Good afternoon Jim

Regarding draft section 5(c)(3): It is not clear what this requirement implies. Are you intending that certified laboratory results with QC information be attached for each discharge for all normal monitoring parameters or only for extraordinary monitoring? Or worse, that a redundant table of data that has already been recorded in the NetDMR application be attached?

If so, this seems like an extreme requirement for a General Permit, and beyond even what is required for NPDES DMR/ATMR reporting. Considering that SIUs should receive routine on-site inspections, this seems like an unnecessary burden to the reporter and the system.

If not, please clarify the intended requirement.

Regarding draft section 5(d)(2)(B): How will manual (mailed) submission of the second representative sample impact NetDMR users? Is this to be reported in letter form, or with a manual DMR form? The second sample data could/should be considered and reported in the NetDMR and other reporting requirements described in 5(d)(3). That said, can you explain the benefit of the manual submission to DMR Processing?

Regarding draft section 5(e)(1) and (2): Please consider defining or otherwise clarifying “Wastewater Treatment Systems and Controls” such that it is clearly applicable or not applicable to discharge processes where no treatment to meet permit discharge limits is conducted. I have had a CTDEEP permit engineer explain to me that O&Ms are required for every single discharge because simply collecting and pumping wastewater to the sanitary header constitutes treatment. The general consensus as I understand it is that “treatment” is treatment to meet permit limits, such as pH adjustment by chemical addition. I have also had the same engineer tell me that replacing a failed discharge pump with an identical discharge pump from the same manufacturer requires preapproval.

Regarding draft section 5(e)(4)(B)(i): consider allowing for a 3rd party PE approved tank integrity inspection plan based on STI or similar standards for tanks installed before a certain date (such as the initial issuance date of the original MISC GP). EB has wastewater tanks that predate this specific permit requirement, but do comply with the more general requirement in other permits that allow for being “maintained such that” a release should not occur.

Thanks

Patrick A. Geier
Electric Boat Corporation
Environmental Engineering Specialist
Office: 860-433-6534
Cell: 860-326-1442

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