

South Central Connecticut Regional Water Authority
90 Sargent Drive, New Haven, Connecticut 06511-5966 203.562.4020
<http://www.rwater.com>

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

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 draft General Permit for the Discharge of Wastewaters from Significant Industrial Users (SIU) Wastewater. We have the following comments:

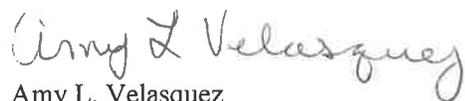
1. The Eligible Activities in Section 3(a) need to be clarified and better aligned with the definition of SIU. For example, there is currently no mention of non-process wastewater in the definition of SIU.
2. The requirements for an independent Qualified Professional Engineer (QPE) in Section 3(b)(9) is overly restrictive and costly for water treatment wastewater discharges that have been permitted since the 1980s. The new QPE requirements will result in RWA using a third engineering firm to prepare the SIU registration after getting a new firm to prepare the registration for the General Permit for Discharges of Miscellaneous Sewer Compatible Wastewater from Industrial Users (MISC GP) in 2018. We recommend
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 Miscellaneous Discharges of Sewer Compatible Wastewater only required these plans for discharges that required treatment. These plans can be expensive and time consuming to prepare and should not be required for all discharges.
 - The requirements for both the O&M Plan and SPCP are too prescriptive given the variety of processes covered by the General Permit. The General Permit does not need to include every detail of these plans as a QPE must certify that the O&M and SPCP are adequate to assure that the covered activity will comply with the General Permit. We recommend CTDEEP provide more general requirements rather than the detailed lists included in Appendices B and C.

- 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”. We recommend providing some size threshold like 55-gallons and remove the vague phrase “any other chemicals”.
- Also, based on this language, as water treatment wastewater is being covered as a process wastewater 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. We recommend removing process wastewater from the SPCP.

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