



STATE OF CONNECTICUT

COUNCIL ON ENVIRONMENTAL QUALITY

VIA ELECTRONIC MAIL

Keith Ainsworth
Acting Chair

March 8, 2024

Christopher Donnelly

Audra Dickson
Department of Energy and Environmental Protection
79 Elm Street, Hartford, CT 06106-5127
Audra.Dickson@ct.gov

David Kalafa

Matthew Reiser

Re: General Permit for the Discharge of Swimming Pool Wastewater to Surface and Ground Waters of the State

Denise Rodosevich

Dear Audra Dickson:

Charles Vidich

The Council on Environmental Quality (Council) has reviewed the Draft General Permit for the Discharge of Swimming Pool Wastewater to Surface and Ground Waters of the State (SPWGP).

William Warzecha

It is noted that in Section 4.6.1.2, discharges of swimming pool wastewater draining from a pool that uses a chlorine generator to produce free chlorine, and thus has the potential for a higher sodium chloride content must be discharged to a Publicly Owned Treatment Works (POTW) or applied to the ground surface and must entirely infiltrate into the ground. The concentration of sodium chloride in pools is typically between 2,700-3,400 ppm (parts per million) and the Connecticut Department of Public Health provides guidance for sodium concentrations over 100 ppm and chloride levels over 250 ppm for drinking water. Should specific separation distances or other requirements be specified in the SPWGP for such discharges to groundwater to better protect drinking water?

Paul Aresta
Executive Director

It is noted in Section 2.2, that "Discharges to Sanitary Sewer" are not covered by the SPWGP, but such discharges are covered by either the General Permit for Discharges from Miscellaneous Industrial Users or the General Permit for the Discharge of Wastewaters from Significant Industrial Users (Industrial General Permits). It is recommended that since the SPWGP requires permittees to discharge to available sanitary sewers, that a definition for sanitary sewer be added in Section 11 and that notes that such discharges to a sanitary sewer are permitted by one of the two Industrial General Permits.

It is also noted that the use of defined terms in the body of the permit are not always consistent with what is listed in Section 11. For example, the definition of "person" in Section 11 excludes municipalities, but the definition of "person" in Section 2.2.1.1 and the paragraph below Section 4.1.5 includes municipalities. In addition, Sections 3.1 and 9.14 note that coverage under the SPWGP is automatically granted without submitting a registration to the Commissioner; however, the use of the term "registrant" within the SPWGP and the definition in Section 11 might lead to confusion.

Thank you for your consideration of these comments.

Sincerely,

Paul Aresta, Executive Director