



**Underground Injection Control Permit
Fact Sheet**

Permit Summary		
Applicant	Green Farms Academy, Inc.	
Permit No.	UI0000525 will supersede GSSD000111	
Application No.	202309494	
Date Application Received	December 18, 2023	
Date of Public Notice of Application	December 2, 2023	
Location Address	Greens Farms Academy, Inc. 35 Beachside Avenue Westport, CT 06880	
Facility Contact	Jennifer Campbell Chief Financial and Operating Officer Phone number: 203-256-0717 Email: jcampbell@gfacademy.org	
Discharge Monitoring Report Contact	Jennifer Campbell Chief Financial and Operating Officer Phone number: 203-256-0717 Email: jcampbell@gfacademy.org	
Mailing Address	Greens Farms Academy, Inc. 35 Beachside Avenue Westport, CT 06880	
Permit Term	10 Years	
Permit Type	New	
Permit Category	UIC Class V Injection Well	
Treatment System Description	5W11 Conventional System	5W12 Advanced Treatment
Ownership	Private	
Compliance Schedule in Draft Permit	Yes	
Compliance Schedule in Previous Permit	No	
Receiving Waterbody	Groundwater in the Southwest Shoreline Watershed	
Water Quality Classification(s)	GB and GA	
Treatment System Location(s)	DSN C01, C02, C03, C04, C05, C06, and A01	
DEEP Staff	Antoanela Daha, Environmental Engineer 860-424-3876 Email: Antoanela.daha@ct.gov	

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Section 1.0 Permit Fees

Discharge Code: 312000a Treatment System: DSN A01 Annual Fee: \$1,110

Discharge Code: 312000a Treatment System: DSN C01, C02, C03, C04, C05, C06

Section 2.0 Nature of Business Generating Discharge

Greens Farms Academy, Inc. is a private K–12 school located in Westport, Connecticut. The school is currently permitted to discharge 10,338 gallons per day (“gpd”) of domestic wastewater through seven (7) conventional subsurface sewage disposal systems, under General Permit No. GSSD000111. The 7th system was taken offline in 2024/2025 and is not carried forward in the individual permit

The Applicant is now seeking authorization to upgrade and consolidate its wastewater management system by installing an Alternative Treatment and Disposal System (“AT”). Once constructed the AT system will treat a proposed design flow of 9,738 gpd from campus facilities. The five (5) existing conventional systems will be replaced by the AT system, while the 6th conventional system serving the Headmaster’s House with a design flow of 600 gpd will continue to be in operation. Upon authorization from the Commissioner, the facility may expand the AT systems design flow to 11,800 gpd.

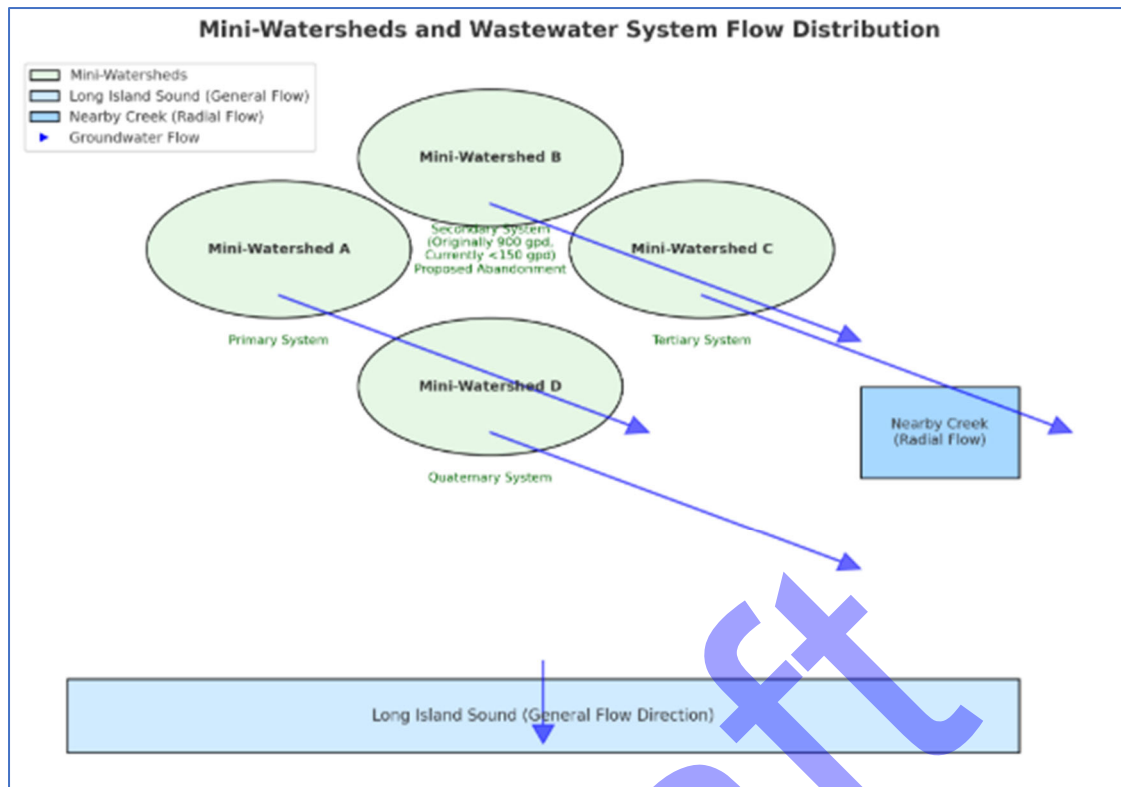
The five (5) existing conventional systems will be abandoned and taken offline once the AT system is brought online. Upon permit issuance, the authorization under the GP (Permit no. GSSD000111) will terminate.

Site History

The property was formerly an agricultural orchard and historical monitoring data indicated that elevated nitrogen, and occasionally phosphorus, were present in upgradient wells prior to the installation of the current conventional treatment systems. The school came under the jurisdiction of the DEEP in September 2000, when it was determined that the total wastewater flow met the jurisdictional threshold. The first permit for the site was issued in 2005 and subsequently modified in 2006 and 2008 following two (2) public hearings. The permits included terms and conditions requiring groundwater monitoring and reporting. Groundwater monitoring data have revealed elevated nutrient levels on-site exceeding drinking water standards.

Due to the location of the site along the coast and groundwater flows, mini-watersheds were originally delineated during the design of the wastewater systems and refined through subsequent permit modifications to reflect localized groundwater flow patterns, which provided a more accurate assessment of nitrogen loading at points of environmental concern. While the overall groundwater flow direction is toward Long Island Sound, localized conditions result in radial flow toward a nearby creek. As a result, nitrogen loading was evaluated individually for each mini-watershed to better understand and manage cumulative nutrient impacts across the site.

The more recently designed and installed systems were configured to optimize the available hydraulic window and account for existing background nitrogen levels. As a result, flow was distributed among the primary, secondary, tertiary, and quaternary leaching fields based on each system’s allowable nitrogen loading capacity despite each of the systems being sized to accept larger design and average flows. See image below.

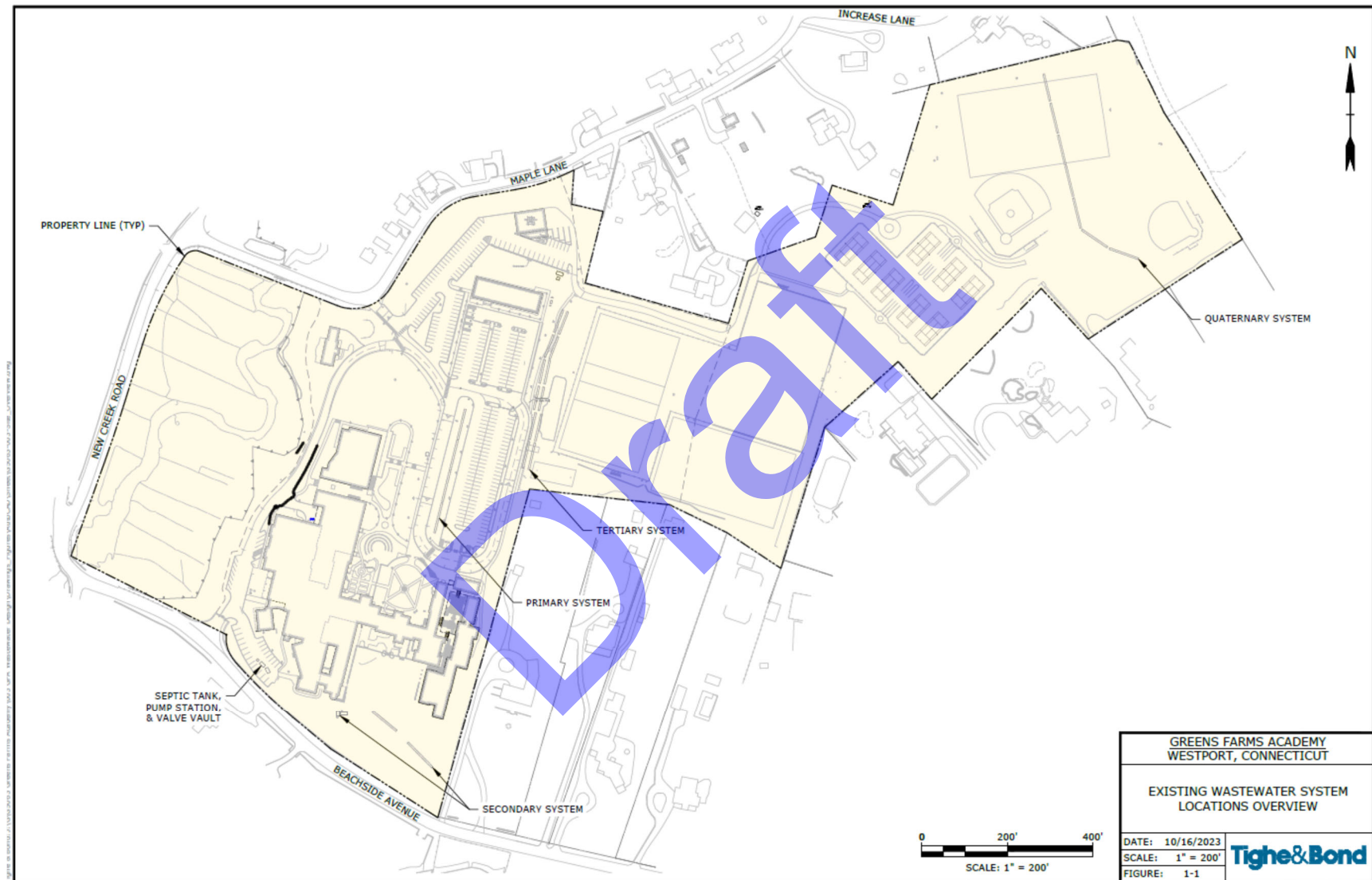


Section 3.0 Application Submittal Information

On December 18, 2023, the Department of Energy and Environmental Protection ("DEEP" or "Department") received an application (Application No. 202309494) from Greens Farms Academy, Inc. ("the Permittee", "the Applicant", "the facility") located in Westport, Connecticut for the issuance of a new UIC permit.

Consistent with the requirements of Section 22a-6g of the Connecticut General Statutes ("Conn. Gen. Stat."), the Permittee published a Notice of Permit Application in the Connecticut Post on December 2, 2023. A Notice of Insufficiency was issued on February 8, 2024, identifying several deficiencies, including the incorrect application type, improper identification of the applicant, incomplete applicant background and compliance information, and inaccurate public notice information. These issues were resolved on February 29, 2024. On April 3, 2024, DEEP determined the application was administratively sufficient and the technical review phase commenced December 16, 2024.

Figure 1. Site layout.



Section 4.0 Permit Amendments & Facility Changes

The Regulations of the Connecticut State Agencies (“Regs. Conn. State Agencies”) require that permittees notify DEEP and obtain written approval of any facility expansion or process change that may result in an increased or new discharge or constitute a new source, and of any expansion or significant changes made to a wastewater collection system, treatment system, or its method of operation in accordance with Regs. Conn. State Agencies Section 22a-430-3(i).

Greens Farms Academy is currently permitted to discharge up to ten thousand three hundred thirty-eight (10,338) gpd of domestic wastewater through seven (7) conventional subsurface sewage disposal systems, under the General Permit to Discharge from Subsurface Disposal Systems (Registration No. GSSD000111) (“General Permit”).

GSSD000111 was renewed on April 22, 2022, and modifications have been performed on site during the permit term.

The following is a list of all modifications and DEEP’s determinations since the previous permit was issued:

Modification of Application Date	Application No.	Department’s Approval Date	Change Implemented
June 7, 2023	202304811	August 30, 2023	Proposed relocation of cell 1 of the tertiary leaching field consisting of 112 feet of 18-inch concrete galleries 40 feet to the east
January 31, 2024	202401368	April 2, 2024	This approval superseded the August 30, 2023 approval and approved relocation of cell 1 and cell 2 of the tertiary leaching field consisting of 2 rows 112 feet of 18-inch concrete galleries 50 feet to the east
August 13, 2024	202407729	August 22, 2024	Installation of a 1,500 gallons septic tank, two pump stations and force mains to connect the proposed Athletic Wellness Center to the existing subsurface sewage disposal system

Section 5.0 Process and Treatment System

The Applicant seeks authorization to discharge treated wastewater for the following:

Previous Discharge Serial Number	New Discharge Serial Number	Proposed Average Daily Flow (gpd)	Proposed Maximum Daily Flow (gpd)	Buildings Served	Treatment Type
N/A	A01	6,492	9,738	Private K–12 school, sports arena and maintenance building	The proposed Alternative Treatment system will consist of two septic tanks, a pump chamber, followed by a two train Klean-Tu systems comprised of two submerged aeration chambers and two denitrification chambers, followed by a dual pump dosing station, and a valve vault distributing flow to three pressure distribution leaching fields
		<i>Expansion:</i> 7,800	<i>Expansion:</i> 11,800		
301-1	C01	1,333	2,000	Primary System	The existing conventional treatment system consists of a grease trap and septic tank followed by a leaching field consisting of 248 feet of 4x1.5 leaching galleries. Primary leach fields to be retained and updated.
301-2	C02	150	900	Secondary System	The existing conventional treatment system consists of a leaching field consisting of a total of 152 feet of 4x4 leaching galleries. To be abandoned and flow redirected to the AT.
301-3	C03	3,225	4,838	Tertiary System	The existing conventional treatment system consists of a leaching field consisting of a total of 704 feet of 4x1.5 leaching galleries. Tertiary leach fields to be retained and updated.
301-4	C04	1,652	2,477	Quaternary System	The existing conventional treatment system consists of a leaching field consisting of a total of 496 feet of 4x1 leaching galleries. Quaternary leach fields to be retained and updated.
301-5	C05	400	600	Headmaster's House	The existing conventional treatment system consists of a septic tank and a pump chamber followed by a leaching field consisting of 54 feet of 4x4 leaching galleries. Headmaster house conventional system to be retained.

Previous Discharge Serial Number	New Discharge Serial Number	Proposed Average Daily Flow (gpd)	Proposed Maximum Daily Flow (gpd)	Buildings Served	Treatment Type
301-6	C06	N/A	350	Winter Sports	The existing conventional treatment system consists of a septic tank and a pump chamber followed by a leaching field consisting of 64 feet of 4x1.5 leaching galleries. To be abandoned and flow redirected to the AT.
Total Design Flow		7,443	11,165	At permit issuance there will be 6 conventional systems C01 – C06 in operation.	
		6,892	10,338	Upon construction and authorization to discharge from the new AT system, retention of conventional system C05, and abandonment of C01, C02, C03, C04, and C06.	
		7,867	11,800	Upon authorization to expand the design flow of the AT system and retention of the conventional system C05	

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Figure 2. Flow Diagram for the Proposed Alternative Treatment System

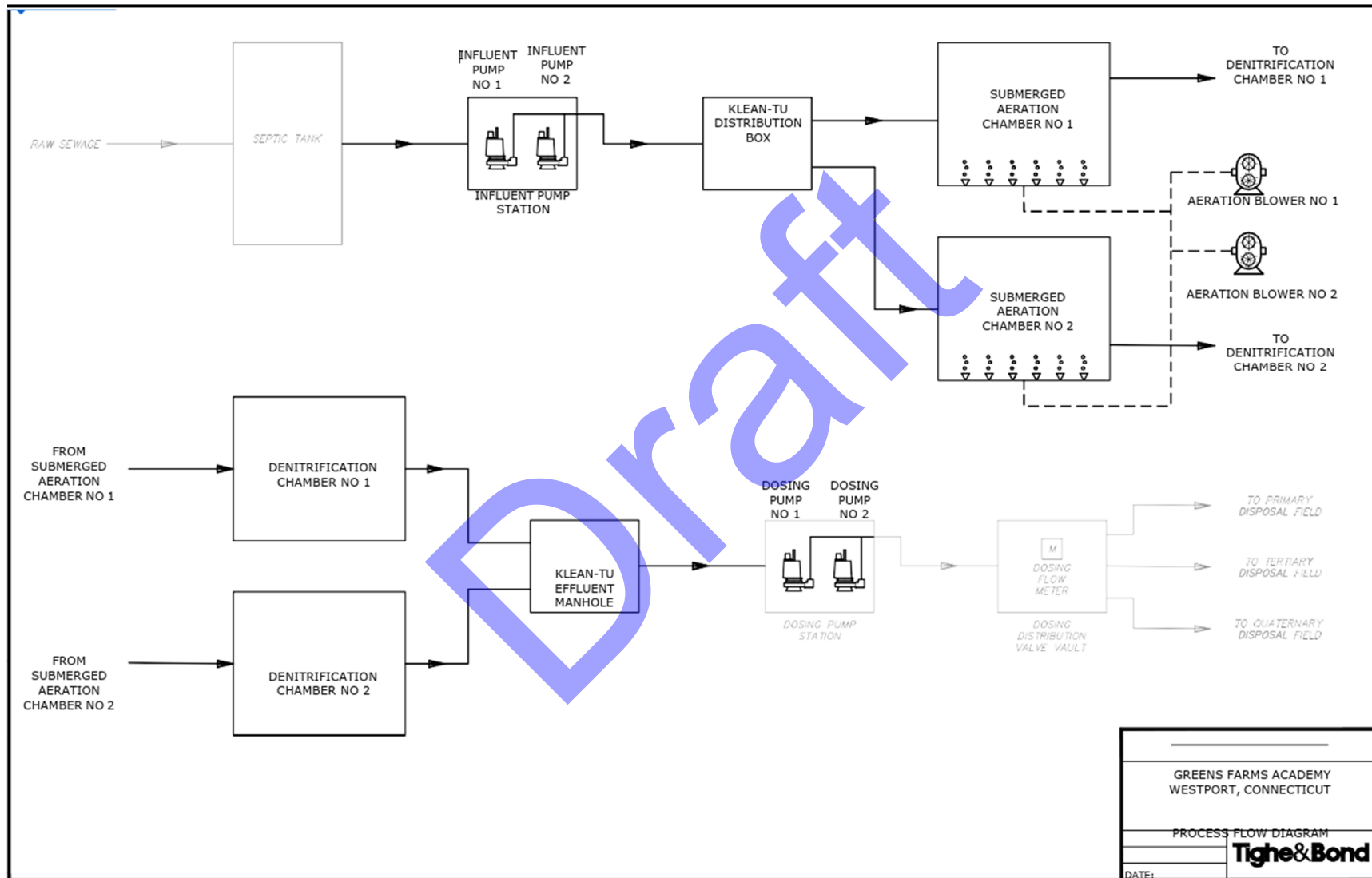


Figure 3. Overall site plan



Section 6.0 Special Site Considerations

6.1 Federally Recognized Indian Land

As provided in the permit application, is the site located on federally recognized Indian land?

☐ Yes ☒ No

6.2 Coastal Area/Coastal Boundary

Is the activity located within a coastal boundary as defined in Conn. Gen. Stat. 22a-94(b)?

☒ Yes ☐ No

6.3 Endangered Species

As provided in the permit application, is the site located within an area identified as a habitat for endangered, threatened or special concern species according to the *State and Federal Listed Species and Natural Communities Map*?

☐ Yes ☒ No

6.4 Aquifer Protection Areas

As provided in the permit application, is the site located within a protected area identified on a Level A or B map?

☐ Yes ☒ No

6.5 Conservation or Preservation Restriction

As provided in the permit application, is the property subject to a conservation or preservation restriction?

☐ Yes ☒ No

6.6 Public Water Supply Watershed

As provided in the permit application, is the site located within a public water supply watershed?

☐ Yes ☒ No

Section 7.0 Compliance History

Is the Permittee subject to ongoing enforcement action? ☐ Yes ☒ No

Based on a review of the administrative record there are no ongoing enforcement actions.

Section 8.0 Application Review

Following the initial technical review of the application, the DEEP issued a Request for Additional Information (“RFAI”) on February 14, 2025, seeking clarification and additional documentation regarding the design of the proposed treatment and disposal system and the site's ability to adequately distribute, transmit, and further treat the effluent.

Although this application for an individual permit represents a new permit request, the facility is currently permitted. The site was previously covered under an individual permit issued in 2005 and subsequently modified in 2008. In 2018, the Greens Farms Academy sought and was granted coverage under the General Permit. Both the previous individual permit and the current General Permit established consistent

requirements for system operation, maintenance, monitoring, and reporting applicable to all wastewater treatment systems located on the site.

DEEP's technical review of the current application determined that the submitted Engineering Report (Attachment Q of the application) was deficient, as it lacked a summary and evaluation of the facility's historical Discharge Monitoring Reports ("DMRs").

Upon request, DEEP received groundwater monitoring data from the facility and conducted a technical review of the information provided. That review indicated that groundwater quality at several downgradient monitoring locations exceeded the standards, particularly with respect to nitrate, total nitrogen, fecal coliform bacteria, and phosphorus. Additionally, the administrative record indicates poor monitoring well conditions, including flooding, cracked casings, and shallow groundwater levels, which may compromise sample reliability, but nonetheless indicate potential groundwater degradation trends.

Greens Farms Academy, Inc., and its representatives were notified of the facility's non-compliance. The identified compliance issues included:

1. Failure to submit DMRs for an extended period of time, approximately two (2) years.
2. Missing and incomplete groundwater monitoring records.
3. Persistent exceedances of groundwater water quality criteria for bacteria, nitrate, total nitrogen, phosphorus, and pH.
4. Evidence of degraded monitoring well integrity.

Given the permittees request for a slight increase in design flow and their commitment to the installation of an Alternative Treatment System to protect groundwater, in lieu of a parallel enforcement action to address the current non-compliance, DEEP has developed the proposed permit which includes a tiered compliance schedule designed to bring the permittee into full compliance with monitoring and reporting requirements, address deficiencies in the groundwater monitoring network, and allow for the construction of a proposed upgraded Alternative Treatment system and increased design flow.

8.1 Evaluation of DMR

Is the Permittee submitting the DMRs electronically in NetDMR?

☐ Yes ☒ No

See included attachment: "GW Monitoring for Existing Systems"

8.2 Site Investigation

DEEP staff conducted multiple site visits during the development of the initial permit issuance, performed compliance assistance site visits, and during system installations. Because the existing primary, tertiary, and quaternary leaching fields are proposed to be retained (secondary fields will be abandoned) and retrofitted for pressure distribution, no additional site investigation was required as part of the current application.

The quaternary and tertiary systems were designed to optimize the available hydraulic window and to account for existing background nitrogen concentrations. Accordingly, wastewater flows were distributed among the primary, secondary, tertiary, and quaternary leaching fields based on the allowable nitrogen loading capacity of each system, even though each system was originally sized to accept larger design and average flows. For example, the secondary system was designed for a capacity of approximately nine hundred (900) gpd; however, due to elevated nitrogen concentrations (approximately 7 mg/L) detected in the upgradient monitoring well, actual discharge to this system has recently been limited to less than one hundred fifty (150) gpd. As a result, the secondary leaching field is proposed to be abandoned under this permit.

To address historical and future nutrient concentration concerns in the groundwater, the applicant proposes installation of an AT system designed to reduce nitrogen and phosphorus concentrations in the effluent prior to discharge to the groundwater. As reported by the applicant, the proposed AT system is expected to achieve approximately a 92% reduction in total nitrogen (“TN”) and a 34% reduction in total phosphorus (“TP”) compared to current discharge concentrations. These estimates are based on existing effluent concentrations from the conventional system of approximately 135 mg/L TN and 20 mg/L TP, with expected effluent concentrations of 8 mg/L TN and 17.5 mg/L TP following implementation of the AT system. DEEP expects that additional treatment in and beneath the leaching fields will result in the protection of groundwater.

At DEEP’s request, the applicant provided a calculated and modeled evaluation of the anticipated effects of the proposed system improvements on nutrient loading from the property. The analysis demonstrates that the proposed configuration is expected to comply with applicable groundwater standards.

Section 9.0 Basis for Limitations, Permit Standards or Conditions

In accordance with section 22a-430 of the Regs. Conn. State Agencies, DEEP’s “Guidance for Design of Large-Scale On-Site Wastewater Renovation Systems” (February 2006), and DEEP’s review of the permit application, site investigation, additional administrative record, and pollutant analyses of the wastewater, a determination has been made that there is a need for an AT system to protect the ground water from pollution. The AT system is designed to treat wastewater and remove pollutants before being discharged to the pressure distribution leaching bed.

9.1 Conventional Systems

Under their existing permit coverage, Greens Farms Academy is permitted for a total flow of 11,165 gpd domestic sewage discharge through six (6) conventional subsurface sewage disposal systems listed in the following table.

This individual permit incorporates the existing conventional systems that are currently permitted under the General Permit. The General Permit coverage will sunset when the individual permit is issued. The Permittee will continue to monitor the existing conventional systems (C01 through C06) in accordance with the following tables until verification that the new AT system installation is provided.

- 9.1.1 The existing discharges are restricted by and shall be monitored in accordance with Table A and C:

TABLE A Summary of Design Flows Existing Subsurface Disposal Systems Flows for Conventional Treatment Systems				
Previous DSN	New DSN	System Name	Average Design Flow (gpd)	Maximum Design Flow (gpd)
301-1	C01	Primary System	1,333	2,000
301-2	C02	Secondary System	150	900
301-3	C03	Tertiary System	3,225	4,838
301-4	C04	Quaternary System	1,652	2,477
301-5	C05	Headmaster System	400	600
301-6	C06	Winter Sports	233	350

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TABLE C Inspection, Monitoring and Maintenance Requirements For Existing Conventional Treatment Systems		
Discharge Serial No.: C01 through C06		Monitoring Location: S
Wastewater Description: Domestic Sewage		
Inspection, Monitoring, or Maintenance	Discharge Serial Nos.	Minimum Frequency
Depth of sludge in septic tanks	All Systems	During pump-out
Pump out the septic tanks	All Systems	Every 5 years
Mechanical inspection of the septic tank baffles and effluent filters	All Systems	During pump-out
Pump out grease trap	C01, C03, C04	Quarterly
Pump out the pump chambers	C01, C02, C03, C04, C05	Every 5 years
Clean Septic tank effluent filters	All systems	During pump-out
Test Run of emergency Generator	C01, C02, C03, C04	Quarterly
Mechanical inspection of alarm conditions	C01, C02, C03, C04	Monthly
Mechanical inspection of valve chambers	C01, C02, C03, C04	Monthly
Visual inspection of distribution chambers	C01, C02, C03, C04	Quarterly
Visual inspection of surface condition of leaching field	All Systems	Quarterly
Depth of ponding in leaching field	All Systems	Quarterly
Mow grass over leaching field	All Systems	Three times per year
Water meter readings of water usage	All Systems	Weekly
Additional Notes: 1. All inspection, monitoring, and maintenance required in this table shall be reported annually by the end of each January as an attachment to the December DMR. 2. The Aspetuck Health District Sanitarian shall be notified at least one week prior to pumping of septic tanks and grease traps. Verification of all pump outs shall be attached to the monitoring report and a copy of the report shall be sent to the Aspetuck Health District Director of Health.		

9.2 Alternative Wastewater Treatment (“AT”)

The wastewater discharging from the AT system is designed to meet the following parameters prior to entering the leachfields:

- Average daily flow: 6,492 gallons per day
- Maximum daily flow: 9,738 gallons per day
- Daily minimum and maximum: pH: 6.0 – 9.0 s.u.

Monitoring requirements for additional parameters, such as nitrate, have been incorporated into the permit to quantify total nitrogen loading and to validate the design criteria and year-round operational efficiency of the treatment system. These discharge limits are established to ensure the continuous hydraulic performance of the system and maintain consistency with established permit requirements across the State of Connecticut.

The Permittee’s discharge post-upgrade shall not exceed and shall otherwise conform to the specific terms and conditions listed in the permit and the following tables.

Expansion

The Permittee must demonstrate compliance for a minimum of one (1) year, prior to requesting to increase the design flow. Upon request, the Commissioner will perform a compliance evaluation and make a recommendation. Upon the Commissioner’s written approval to increase design flow, the Permittee shall comply with the following effluent limits prior to entering the leachfields:

- Average daily flow: 7,800 gallons per day
- Maximum daily flow: 11,800 gallons per day
- Daily minimum and maximum: pH: 6.0 – 9.0 s.u.

9.3 Sampling Frequency, Type, and Reporting

TABLE D					
Domestic Wastewater: Influent to the Alternative Treatment System					
Discharge Serial No.: A01			Monitoring Location: ST ¹		
Wastewater Description: Influent to the treatment system					
Monitoring Location Description: Septic Tank Effluent					
Flow/Time Based Monitoring					
Parameter	Units	Average Daily Flow Limit	Maximum Daily Flow Limit	Sample Type	Sample Frequency
Flow Rate ²	gpd	6,492	9,738	Totalizer	Continuous
Flow Rate ⁶	gpd	7,800	11,800	Totalizer	Continuous
Instantaneous Monitoring					
Parameter	NetDMR Code	Units	Average Monthly Limit ^{3,4}	Sample Type	Sample Frequency ⁵
Biochemical Oxygen Demand _{5day}	00310	mg/L	Report	Grab	Twice per month
Total Suspended Solids	00530	mg/L	Report	Grab	Twice per month
Total Kjeldahl Nitrogen	00625	mg/L	Report	Grab	Twice per month
pH	00400	S.U.	Report ⁴	Grab	Twice per month
Footnotes:					
1. Monitoring location as depicted on as-built plan.					
2. For this parameter, the Permittee shall maintain at the facility a record of the total flow for each day of discharge and shall report on the DMR the Average Daily Flow and the Maximum Daily Flow for each month.					
3. “Report” in the limits column on this monitoring table means a limit is not specified, but monitoring is required, and a value must be reported on the DMR.					
4. pH shall be reported as the daily minimum and daily maximum values for the month.					
5. Sample shall be taken twice per month on two different calendar days.					
6. After one (1) year of providing compliance with terms and conditions of this permit the Permittee may be permitted to increase the flow.					

TABLE E						
Domestic wastewater: Effluent from the Alternative Treatment System						
Discharge Serial No.: A01				Monitoring Location: E		
Wastewater Description: Pretreated Domestic Sewage Effluent						
Monitoring Location Description: NitROE Effluent						
FLOW/TIME BASED MONITORING						
Parameter	NetDMR Code	Units	Average Daily Flow Limit	Maximum Daily Flow Limit	Sample Type	Sample Frequency
Flow Rate ¹	00056	gpd	6,492	9,738	Totalizer	Continuous
Flow Rate ⁹	00056	gpd	7,800	11,800	Totalizer	Continuous
Instantaneous Monitoring						
Parameter	NetDMR Code	Units	Average Monthly Limit ²	Maximum Daily Limit ^{4,5}	Sample Type	Sample Frequency ⁴
Biochemical Oxygen Demand _{5-day}	00310	mg/L	10 ¹¹	10	24-hr composite	weekly
Total Suspended Solids	00530	mg/L	5 ¹¹	5	24-hr composite	weekly
Total Nitrogen ⁸	00600	mg/L	10 ³	Report	24-hr composite	monthly
Ammonia	00610	mg/L	Report	Report	24-hr composite	monthly
Nitrate Nitrogen ⁷	00620	mg/L	Report	Report	24-hr composite	monthly
Nitrite Nitrogen	00615	mg/L	Report	Report	24-hr composite	monthly
Total Kjeldahl Nitrogen ⁶	00625	mg/L	Report	Report	24-hr composite	monthly
Total Phosphorus	00665	mg/L	Report	Report	24-hr composite	monthly
pH, Minimum ⁵ (Day of Sampling)	61942	S.U.	NA	6.0	Grab	Continuous
pH, Maximum (Day of Sampling)	61941	S.U.	NA	9.0	Grab	Continuous
Alkalinity	00410	mg/L	Report	Report	Grab	weekly
Turbidity	82079	NTU	Report	2	Continuous	Continuous
Total Coliform	74056	CFU/100ml	2.2 ¹⁰	14	Grab	weekly
UV Disinfection Dose (minimum)	----	mJ/cm ²	100	100	Continuous	Continuous

Discharge Serial No.: A01	Monitoring Location: E
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Monitoring Location Description: NitROE Effluent

FLOW/TIME BASED MONITORING

	11-000000		1			

Instantaneous Monitoring

	NetDMR		Average	Maximum	Sample	Sample
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TABLE E	
Domestic wastewater: Effluent from the Alternative Treatment System	
Discharge Serial No.: A01	Monitoring Location: E
Wastewater Description: Pretreated Domestic Sewage Effluent	
Monitoring Location Description: NitROE Effluent	
Footnotes: - For this parameter, the Permittee shall maintain at the facility a record of the total flow for each day of discharge and shall report on the DMR the Average Daily Flow and the Maximum Daily Flow for each month. “Report” in the limits column on this monitoring table means a limit is not specified, but monitoring is required, and a value must be reported on the DMR. - Limit is based on a twelve-month rolling average. - Sample shall be taken twice per month on two different calendar days. - For the parameter pH, the daily minimum limit is 6.0 S.U. and the daily maximum limit is 9.0 S.U. For reporting purposes, report the minimum and maximum values for the month. - Total Kjeldahl nitrogen shall be analyzed in accordance with EPA Method 4500 in accordance with 40 CFR 136. - Nitrate Nitrogen shall be analyzed in accordance with EPA Method 4110 B-2020 in accordance with 40 CFR 136. - Total Nitrogen shall be determined by the summation of nitrate nitrogen, nitrite nitrogen and total Kjeldahl nitrogen (Total Nitrogen (TN)=TKN+NO₃-N+NO₂-N). - Upon authorization from the Commissioner. - Seven-day median. - DEEP may consider higher effluent for BOD and TSS based on final treatment design.	

TABLE F Headmaster's House Subsurface Disposal System						
Discharge Serial No.: C05				Monitoring Location: E		
Wastewater Description: Domestic Sewage from the Headmaster's House						
Monitoring Location Description: Septic Tank Effluent						
Flow/Time Based Monitoring						
Parameter	NetDMR Code	Units	Average Daily Flow Limit	Maximum Daily Flow Limit	Sample Type	Sample Frequency
Flow Rate ¹	00056	gpd	400	600	Totalizer	Continuous
Footnotes:						
1. For this parameter, the Permittee shall maintain at the facility a record of the total flow for each day of discharge and shall report on the DMR the Average Daily Flow and the Maximum Daily Flow for each month.						

9.4 Inspection, Monitoring and Maintenance Requirements

The Permittee shall maintain the treatment facilities in accordance with the following tables:

TABLE H Inspection, Monitoring and Maintenance Requirements for the Alternative Treatment System	
Discharge Serial No.: A01	Monitoring Location: S
Wastewater Description: Domestic Sewage	
Average Daily Flow: 6,492 gallons per day	Maximum Daily Flow: 9,738 gallons per day
Average Daily Flow: 7,800 gallons per day ¹	Maximum Daily Flow: 11,800 gallons per day ¹
Inspection, Monitoring, or Maintenance	Minimum Frequency
Depth of sludge in septic tanks	During pump-out
Pump out septic tanks	Annually
Pump out grease trap	Quarterly
Mechanical inspection of septic tank baffles	During pump-out
Mechanical inspection of grease trap baffles	During pump-out
Mechanical inspection of septic tank effluent filter	During pump-out
Clean septic tank effluent filter	During pump-out
Mechanical inspection of pump station	Monthly
Pump out equalization tank	Annually
Test run of emergency generator	Quarterly
Water meter readings of water usage	Weekly
Visual inspection of aeration chambers	Monthly
Visual inspection of denitrification chambers	Monthly
Visual inspection of Klean-Tu (NitROE)	Monthly
Mechanical inspection of alarms	Monthly
Mechanical inspection of blowers	Monthly
Visual inspection of valve vault	Monthly
Mechanical inspection of the primary distribution valve	Monthly
Mechanical inspection of the tertiary distribution valve	Monthly
Mechanical inspection of the quaternary distribution valve	Monthly
Disinfection Unit Inspection	Monthly
Visual inspection of surface condition of leaching fields	Quarterly
Depth of ponding in leaching fields	Quarterly
Mow grass over leaching fields	3 times per year
Footnote: 1. The permittee must demonstrate compliance for a minimum of one (1) year prior to requesting an increase in flow.	
Additional Notes: 1. All inspection, monitoring, and maintenance required in this table shall be reported annually by the end of each January as an attachment to the December DMR.	

TABLE H Inspection, Monitoring and Maintenance Requirements for the Alternative Treatment System	
Discharge Serial No.: A01	Monitoring Location: S
Wastewater Description: Domestic Sewage	
Average Daily Flow: 6,492 gallons per day	Maximum Daily Flow: 9,738 gallons per day
Average Daily Flow: 7,800 gallons per day ¹	Maximum Daily Flow: 11,800 gallons per day ¹
Inspection, Monitoring, or Maintenance	Minimum Frequency
2. The Aspetuck Health District Sanitarian shall be notified at least one week prior to pumping of septic tanks and grease traps. Verification of all pump outs shall be attached to the monitoring report and a copy of the report shall be sent to the Aspetuck Health District Director of Health.	

TABLE I Inspection, Monitoring and Maintenance Requirements Headmaster's House	
Discharge Serial No.: C05	Monitoring Location: S
Wastewater Description: Domestic Sewage from Headmaster's House	
Average Daily Flow: 400 gallons per day	Maximum Daily Flow: 600 gallons per day
Inspection, Monitoring, or Maintenance	Minimum Frequency
Depth of sludge in septic tank	During pump-out
Pump out the septic tank	Every 5 years
Mechanical inspection of the septic tank baffles	During pump-out
Pump out the pump chamber	Every 5 years
Visual inspection of surface condition of leaching field	Quarterly
Mow grass over leaching field	Three times per year
Additional Notes: 1. All inspection, monitoring, and maintenance shall be kept on-site and available upon request by the Commissioner. 2. The Aspetuck Health District Sanitarian shall be notified at least one week prior to pumping of septic tanks and grease traps. Verification of all pump outs shall be attached to the monitoring report and a copy of the report shall be sent to the Aspetuck Health District Director of Health.	

Section 10.0 Groundwater Monitoring Requirements

To ensure that treated domestic wastewater does not result in groundwater pollution, monitoring is required at the perimeter of the designated Zone of Influence (“ZOI”). Pursuant to Regs. Conn. State Agencies Section 22a-426-7, all groundwater migrating beyond the ZOI must comply with the primary Maximum Contaminant Levels (“MCLs”) established by the Commissioner of Public Health. Adherence to these standards ensures that discharges do not pose an unacceptable risk to public health and remain consistent with the State's anti-degradation policies.

10.1. Existing Groundwater Monitoring

Groundwater monitoring shall be conducted in accordance with Table B prior to the installation of the treatment system and/or implementation of the new monitoring protocol approved under the permit’s compliance schedule.

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TABLE B
Existing Groundwater Monitoring

Discharge Serial Nos: C01, C02, C03, C04, C05, and C06			Monitoring Location: GW and GV	
Groundwater Monitoring Location Nos.: MW-3a, MW-4, MW-5, MW-7, MMI-10, OW-5, OW-6, OW-9			Description: Downgradient and upgradient monitoring wells	
Parameter	NetDMR Code	Units	Frequency of Sampling	Sample Type
Total Coliform	74055	Col/100ml	Quarterly	Grab
Groundwater Depth (Standard depth below grade)	72019	Ft	Quarterly	Instantaneous
Ammonia Nitrogen	00610	mg/L	Quarterly	Grab
Nitrate Nitrogen	00620	mg/L	Quarterly	Grab
Nitrite Nitrogen	00615	mg/L	Quarterly	Grab
Total Kjeldahl Nitrogen	00625	mg/L	Quarterly	Grab
Total Nitrogen	00600	mg/L	Quarterly	Grab
pH ¹	00400	S.U.	Quarterly	Grab
Total Phosphorous	00666	mg/L	Quarterly	Grab
Footnotes: 1. For the parameter pH, the daily minimum limit is 6.0 S.U. and the daily maximum limit is 9.0 S.U. 2. Groundwater Monitoring Well key:				
Monitoring Well No.		Location		
MW-7 OW-9		Upgradient		
MW-3a, MW-4, MW-5 MMI-10, OW-5, OW-6		Downgradient		

10.2 Proposed Groundwater Monitoring

Upon issuance of the permit, groundwater monitoring shall be conducted in accordance with Table G following the installation of the treatment system and/or implementation of the new monitoring protocol approved under the permit's compliance schedule.

Table G Proposed Groundwater Monitoring Wells					
Monitoring Wells for Systems: C05 and A01				Monitoring Location: GW	
Groundwater Monitoring No(s) ³ :. To be Determined based on an approved Groundwater Monitoring Plan submitted				Description: Monitoring Well	
Parameter	NetDMR Code	Maximum Daily Limit ^{1,2}	Units	Frequency of Sampling	Sample Type
Total Coliform	74055	0 (zero)	Col/100ml	Quarterly	Grab
Groundwater Depth (Standard depth below grade)	72019	Report	Ft	Quarterly	Instantaneous
Ammonia Nitrogen	00610	Report	mg/L	Quarterly	Grab
Nitrate Nitrogen	00620	10	mg/L	Quarterly	Grab
Nitrite Nitrogen	00615	1	mg/L	Quarterly	Grab
Total Kjeldahl Nitrogen	00625	Report	mg/L	Quarterly	Grab
Total Nitrogen	00600	Report	mg/L	Quarterly	Grab
pH ²	00400	6.0 – 9.0	S.U.	Quarterly	Grab
Total Phosphorous	00666	Report	mg/L	Quarterly	Grab
Footnotes: 1. "Report" in the limits column on this monitoring table means a limit is not specified, but monitoring is required, and a value must be reported on the DMR. 2. For the parameter pH, the daily minimum limit is 6.0 S.U. and the daily maximum limit is 9.0 S.U. For reporting purposes report the minimum and maximum values for the month.					

10.3 Leaching Field and Leaching Bed Requirements

The leaching field for the Headmaster's House is designed to accept six hundred (600) gpd and has a total area of 500 sf leaching field consisting of 54 ft of 4x4 leaching galleries.

The total area of the leaching fields for the AT system is 11,904 sf.

Leaching Field	Design Flow Capacity (gpd)	New DSN	Total Area (sf)	Leaching Gallery Configuration
Primary Leaching Field	2,700	C01	2,304	288 ft of 4 × 1.5 leaching galleries
Tertiary Leaching Field	4,500	C03	5,632	704 ft of 4 × 1.5 leaching galleries
Quaternary Leaching Field	4,600	C04	3,968	496 ft of 4 × 1 leaching galleries
Overall AT System	11,800	A01	11,904	Effluent dispersed through three existing leaching fields retained and retrofitted for pressure distribution

10.4 Groundwater Nitrogen Calculation

In accordance with the required groundwater monitoring, the downgradient wells shall not exceed the drinking water maximum contaminant level of ten (10) mg/L for nitrate at the point of environmental concern, unless otherwise permitted.

Nutrient concentrations at downgradient property boundaries have exceeded drinking water standards in multiple monitoring events, despite operational efforts to control wastewater flows based on nitrogen concentrations and loading rates within the designated mini watersheds.

Applicants must provide all variables for the Nitrogen Loading Equation in the format prescribed below. Calculations for A_e (effective infiltration area) must include the specific dimensions for X_d , X_u , X_{system} , and y .

The mathematical expression of the nitrogen dilution model used by the Department is as follows:

$$N_{gw} = \frac{(Q_{ww} \times N_{ww})}{(Q_{ww} + Q_{ip})}$$

The following table presents nitrogen loading calculations based on the originally designed mini-watershed contributions to the nitrogen dilution model, incorporating wastewater flow rates and the average base groundwater flow conditions established during the initial design of the conventional systems.

The primary, tertiary, and Headmaster systems share a common watershed contributing to the groundwater model; therefore, their combined nitrogen contribution was evaluated collectively.

The model assumes a final effluent nitrogen concentration discharging from the AT system of eight (8) mg/L for wastewater discharged to the subsurface and adjusts the overall nitrogen contribution to account for a background groundwater concentration of 14.3 mg/L.

For the remaining conventional treatment system for the Headmaster's building, the model assumes a forty percent (40%) reduction in nitrogen through the septic tank and leaching field, resulting in an estimated effluent concentration of 69 mg/L.

Watershed for Primary, Tertiary Leachfields and Headmaster's House:

Variable	Description	Applicant Value	Units
Q_{ww1}	Daily design volume of wastewater primary and tertiary system	7,200	GPD
Q_{ww2}	Daily design volume of wastewater Headmaster system	600	GPD
N_{ww1}	Nitrogen concentration reaching groundwater in wastewater from primary and tertiary leachfields	8.0	mg/L
N_{ww+bg}	Adjusted Nitrogen concentration with background levels	14.3	mg/L
N_{ww2}	Nitrogen concentration reaching groundwater in wastewater from Headmaster system	69	mg/L
Q_{bg}	Base groundwater flow	25,092	GPD
Q_{ip}	Daily volume of infiltrated precipitation	13,440	GPD
N_{gw}	Nitrogen concentration in ground water at the point of concern (mg/L) & Final Calculated Nitrogen Concentration	3.05	mg/L

The quaternary leaching field is located in a different watershed contributing to the model as indicated in the following table:

Variable	Description	Applicant Value	Units
Q_{ww3}	Daily design volume of wastewater quaternary system	4,600	GPD
N_{ww3}	Nitrogen concentration reaching groundwater in wastewater	9.5	mg/L
Q_{ip}	Daily volume of infiltrated precipitation	16,364	GPD
N_{gw}	Nitrogen concentration in ground water at the point of concern (mg/L) & Final Calculated Nitrogen Concentration	2.08	mg/L

Based on the administrative record, the calculated diluted nitrogen at the compliance point of concern is less than ten (10) mg/L.

10.5 Phosphorus (P) Removal and Soil Sorption Analysis

The Department utilizes a removal model for phosphorus in treatment system percolate which assumes thirty percent (30%) of phosphorus is removed within the septic tank and the biomat interface. The remaining phosphorus must be attenuated by the unsaturated soil zone beneath the leaching system. The unsaturated soil must demonstrate the capacity to sorb at least six (6) months of the phosphorus load. The Headmaster's conventional system was designed based on the public health code and does not include a phosphorous evaluation.

Phosphorus Sorption Methodology

Step 1: Determine Total Equivalent Horizontal Area (A_h)

- $A_h = \text{Linear Feet} \times (\text{Width} + \text{Sidewall Correction})$

Step 2: Calculate Monthly Phosphorus Load (L_p)

- $L_p = (Q \times 3.785 \times C_p) \times 30.4 \text{ days}$

Step 3: Calculate Mass of Soil (M_s)

The Department assumes that fifty percent (50%) of the subsurface area beneath the system represents the wetted soil volume that is effectively active for flow absorption:

- $M_s = 0.5 \times A_h \times D \times \text{Dry Unit Weight (converted to gm/cu. ft.)}$

Step 4: Determine Sorption Duration

$$\text{Months of Sorption} = \frac{(M_s \times S_v / 100)}{L_p}$$

10.5.1 Primary Leaching Field Phosphorus Absorption

Variable	Description	Applicant Value	Units
Q	Design Average Daily Flow	2,700	GPD
L	Total linear feet of leaching units	288	LT
W	Effective bottom width (inc. stone)	8	ft
D	Depth of unsaturated soil	10.6	ft
C_p	Effluent P concentration	11.55	mg/L
S_v	P sorption value (from soil test)	9	mg/100g
W_d	Average dry unit weight of soil	115	lb/cu.ft
T_s	Calculated Months of Sorption	15	Months

10.5.2 Tertiary Leaching Field Phosphorus Absorption

Variable	Description	Applicant Value	Units
Q	Design Average Daily Flow	4,500	GPD
L	Total linear feet of leaching units	704	LT
W	Effective bottom width (inc. stone)	8	ft
D	Depth of unsaturated soil	8.2	ft
C_p	Effluent P concentration	11.55	mg/L
S_v	P sorption value (from soil test)	9	mg/100g
W_d	Average dry unit weight of soil	115	lb/cu.ft
T_s	Calculated Months of Sorption	18.13	Months

10.5.3 Quaternary Leaching Field Phosphorus Absorption

Variable	Description	Applicant Value	Units
Q	Design Average Daily Flow	4,600	GPD
L	Total linear feet of leaching units	496	LT
W	Effective bottom width (inc. stone)	8	ft
D	Depth of unsaturated soil	3.99	ft
C_p	Effluent P concentration	11.55	mg/L
S_v	P sorption value (from soil test)	9	mg/100g
W_d	Average dry unit weight of soil	115	lb/cu.ft
T_s	Calculated Months of Sorption	6.08	Months

Determination: The site meets the minimum 6-month sorption requirement and is satisfactory with respect to Phosphorus removal.

10.6 Groundwater Pathogen inactivation and Travel Time Analysis

The Department has established a performance objective of 5-log₁₀ (99.999%) virus removal/inactivation prior to wastewater reaching a point of environmental concern. Although some pathogen reduction may occur in septic tanks through sedimentation, anaerobic digestion, and natural die-off, the Department does not credit septic tank removal toward the required virus reduction. Any such removal is considered an additional safety factor.

The primary pathogen attenuation mechanism occurs within the soil of the leaching field and the unsaturated soil beneath the leaching field. Pathogen removal occurs through filtration, adsorption, ion exchange, natural die-off, and microbial antagonism, particularly at the biomat and within the aerobic unsaturated zone. When septic tank effluent is discharged to a properly designed soil wastewater absorption system and percolates through the biomat; and a minimum of three feet of suitable unsaturated soil, approximately 3-log₁₀ (99.9%) virus removal/inactivation may occur.

Pathogens not removed within the unsaturated zone are further attenuated through natural processes during groundwater transport. As the area is served by public water and there are no known drinking wells in the area as provided by the applicant, to ensure protection of the environment, the DEEP requires a minimum of 21 days groundwater travel time between the discharge location and identified receptors, representing approximately 1-log₁₀ reduction.

Groundwater velocity and travel time are determined using site-specific soil conditions and conservative assumptions for hydraulic conductivity (k), hydraulic gradient (i), soil porosity (n), and the distance (d) to the point of environmental concern. Groundwater velocity is calculated using the relationship:

$$v=(k \times i)/n$$

where v represents groundwater velocity. Travel time is then determined using the relationship:

$$v=d/t$$

where d is the distance to the point of environmental concern and t is the resulting groundwater travel time. These relationships are used to demonstrate compliance with the applicable groundwater travel time criteria established by DEEP.

The conventional wastewater systems at this site were originally designed and installed in accordance with the separation distances and groundwater travel time requirements established by the DEEP, and the necessary demonstrations were performed at the time of their installation under prior permits issued by the DEEP.

The current proposal retains the existing leaching field configuration, which will be retrofitted for pressure distribution but will not alter the location, footprint, or separation distances of the disposal areas. Because the configuration of the leaching fields remains unchanged, the previously established groundwater travel time demonstrations remain in place. DEEP is requiring the installation of disinfection treatment to provide direct pathogen inactivation prior to discharge to the subsurface. With the incorporation of disinfection, the effluent is expected to consistently meet the applicable permit limits at the end of the pipe before discharge to the soil, thus ensuring compliance with the water quality standards. Accordingly, the proposed system will provide a significantly higher level of treatment compared to the previously permitted conventional systems, as pathogen reduction will be achieved through both engineered treatment (including disinfection) and natural attenuation mechanisms such as soil filtration and groundwater travel time.

Section 11.0 Permit Compliance Schedule

Does the permit include a compliance schedule? ☒ Yes ☐ No

The proposed permit includes the following compliance schedule:

- 11.1 Within thirty (30) days after issuance of the permit:
 - 11.1.1 The Permittee shall record a copy thereof on the land records in the Town of Westport.
 - 11.1.2 The Permittee shall submit a NeTDMR Subscriber's Agreement.
- 11.2 Within six (6) months of the issuance date of this permit, the permittee shall submit plans and specifications for the installation of the Alternative Treatment system
- 11.3 Within six (6) months of the issuance date of this permit, the Permittee shall submit for the Commissioner's review and written approval a Groundwater Monitoring Plan. The Permittee shall install the monitoring wells and implement the approved Groundwater Monitoring Plan unless the Permittee provides a clear and technically defensible demonstration based on the manufacturer design specifications, pilot test data, or engineering models of the Klean-Tu (NitROE) technology that the alternative treatment system, will consistently meet all effluent limitations and end-of-pipe compliance requirements, such that groundwater monitoring is not necessary to ensure protection of the groundwater resource.
- 11.4 Submit as-built drawings verifying the installation of the alternative sewage treatment system, and within two (2) years after receiving the Commissioner's written approval.

- 11.5 Provide verification that the Alternative Treatment technology is operating in accordance with the approved plans and specifications and is achieving compliance with all permit limits and conditions within three (3) months of commencing the discharge.
- 11.6 Within one (1) year of providing compliance with all terms and conditions of this permit, The permittee may submit a written request to increase the design flow.
- 11.7 Submit the results of a detailed permit compliance audit every two (2) years.
- 11.8 Notify DEEP of any changes occurring on site within fourteen (14) days of the date, the Permittee becomes aware of such changes.
- 11.9 Within six (6) months of the issuance of the permit, submit an Abandonment Plan for the closure of the six (6) conventional systems and monitoring wells.

Section 12.0 Variances and Waivers

The facility did not request a variance or a waiver.

Section 13.0 E-Reporting

The permittee is required to electronically submit discharge monitoring reports.

Section 14.0 Summary of New Permit Conditions

The following changes were made from the previous permits. The 'previous permit' is the authorization to discharge under the General Permit. This is the first iteration of this individual permit. The follow is a summary of the changes from the General Permit to this permit.

1. The permittee is currently operating under the General Permit to Discharge from Subsurface Disposal Systems (Permit No. GSSD000111). Upon issuance of this individual permit, registration under the General Permit will sunset and this individual permit will authorize discharges from the existing conventional systems and future AT system.
2. Requirement to comply with a Compliance Schedule.
3. Requirement to submit Discharge Monitoring Reports electronically to the DEEP via NetDMR in lieu of hard copy submissions.
4. Requirement to submit all notifications of non-compliance and follow-up reports electronically through the DEEP online noncompliance reporting system.

Section 15.0 Public Participation Procedures

15.1 Information Requests

The application has been assigned the following numbers by the Department of Energy and Environmental Protection. Please use these numbers when corresponding with this office regarding this application.

Application No. 202309494

Permit No. UI0000525

Interested persons may obtain copies of the application from

David Seche

Tighe & Bond, Inc.

1000 Bridgeport Ave. Suite 320

Shelton, CT 06484

Email: DTSeche@tighebond.com

Phone Number: (845)516-5837

The application is available for inspection by contacting Lauren Jones at 860-424-3155 or lauren.jones@ct.gov, at the Department of Energy and Environmental Protection, Bureau of Materials Management and Compliance Assurance, 79 Elm Street, Hartford, CT 06106-5127 from 8:30 AM to 4:30 PM, Monday through Friday.

Any interested person may request in writing that his or her name be put on a mailing list to receive notice of intent to issue any permit to discharge to the surface waters of the state. Such request may be for the entire state or any geographic area of the state and shall clearly state in writing the name and mailing address of the interested person and the area for which notices are requested.

15.2 Public Comment

Prior to making a final decision to approve or deny any application, the Commissioner shall consider written comments on the application from interested persons that are received within thirty (30) days of this public notice. Written comments should be directed to Lauren Jones, Bureau of Materials Management and Compliance Assurance, Department of Energy and Environmental Protection, 79 Elm Street, Hartford, CT 06106-5127 or DEEP.UICPermitting@ct.gov. The Commissioner may hold a public hearing prior to approving or denying an application if in the Commissioner's discretion the public interest will be best served thereby and shall hold a hearing upon receipt of a petition signed by at least twenty-five persons. Notice of any public hearing shall be published at least thirty (30) days prior to the hearing.

15.3 Petitions for Hearing

Petitions shall be submitted within thirty (30) days from the date of publication of this public notice and should include the application number noted above and also identify a contact person to receive notifications. Petitions may also identify a person who is authorized to engage in discussions regarding the application and, if resolution is reached, withdraw the petition. Upon receipt of a petition, the Commissioner shall take action as required by relevant laws, including Public Act 25-84, which was effective upon passage in June 2025. The Office of Adjudications will accept electronically-filed petitions for hearing in addition to those submitted by mail or hand-delivered. Petitions with required signatures may be sent to deep.adjudications@ct.gov; those mailed or delivered should go to the DEEP Office of Adjudications, 79 Elm Street, Hartford, CT 06106. If the signed original petition is only in an electronic

format, the petition must be submitted with a statement signed by the petitioner that the petition exists only in that form. Original petitions that were filed electronically must also be mailed or delivered to the Office of Adjudications within thirty (30) days of electronic submittal. Additional information can be found at www.ct.gov/deep/adjudications.

Attachment 1 – Site Map - See the included “Application and Supporting Documents”

Attachment 2 - Coastal Consistency – See the included “Application and Supporting Documents”

Attachment 3 – Summary of DMR data -See the included “GW monitoring for Existing Systems”

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