Received: Wed 10/7/2020 3:41 PM
Hi Ann,

I am concerned that the authorization to bypass above 30 MGD is not consistent with the CSO Policy, and therefore the Clean Water Act.

Second II.C.7 of the 1994 CSO Control Policy states the following (**emphasis added**):

> Normally, it is the responsibility of the permittee to document, on a case-by-case basis, compliance with 40 CFR 122.41(m) in order to bypass flows legally. For some CSO-related permits, the study of feasible alternatives in the control plan may provide sufficient support for the permit record and for approval of a CSO-related bypass in the permit itself, and to define the specific parameters under which a bypass can legally occur. For approval of a CSO-related bypass, **the long-term CSO control plan**, at a minimum, should provide justification for the cut-off point at which the flow will be diverted from the secondary treatment portion of the treatment plant, and **provide a benefit-cost analysis demonstrating that conveyance of wet weather flow to the POTW for primary treatment is more beneficial than other CSO abatement alternatives** such as storage and pump back for secondary treatment, sewer separation, or satellite treatment. Such a permit must define under what specific wet weather conditions a CSO-related bypass is allowed and also specify what treatment or what monitoring, and effluent limitations and requirements apply to the bypass flow. The permit should also provide that approval for the CSO-related bypass will be reviewed and may be modified or terminated if there is a substantial increase in the volume or character of pollutants being introduced to the POTW. **The CSO-related bypass provision in the permit should also make it clear that all wet weather flows passing the headworks of the POTW treatment plant will receive at least primary clarification and solids and floatables removal and disposal, and disinfection, where necessary, and any other treatment that can reasonably be provided**.

While the Policy allows for a prospective authorization of bypasses in certain circumstances, it sets conditions for these authorizations.

First, a study, such as a Long-Term Control Plan, should document that elimination of the bypass is not feasible. The Fact Sheet provides no information on the would-be permitted bypass. The City stated in its responses to the2017 Administrative Order on Consent (Docket No. CWA-AO-R01-FY17-06) that Norwalk still has catchbasins connected to the sewer. The City has not submitted documentation showing that these cannot be disconnected, only that it is inconvenient to do so.

Second, the Policy states that all bypassed flows “will received at least primary clarification and solids and floatables removal and disposal, and disinfection, where necessary, and any other treatment that can reasonably be provided.” CSO Policy at 18693. Additionally, “the permitting

authority should ensure that the bypass will not cause exceedances of WQS." *Id.* at 18694. Norwalk's bypass is a□er the headworks but before primary treatment. It is not clear how Norwalk's bypass satisfies these requirements of the CSO Policy for an approved prospective bypass.

Third, the CSO Policy states that the permitting authority should include provisions in the permit that the bypass approval will be reviewed and may be modified or terminated if there is a substantial increase in the volume or character of pollutants being introduced to the POTW. CSO Policy at 18693. Although EPA questions the appropriateness of authorizing this bypass, should the State have the record to support such a decision it should include permit language as described in the preceding sentence.

Also, on a slightly different topic, what does DEEP mean in Section 9(A)(7) when it states that the City shall reduce excessive infiltration/inflow to the sewer system? EPA's 1985 guidance states that when I/I contributes to overflows, it is automatically excessive. Since DEEP knows that an overflow exists, EPA recommends providing a schedule detailing specific steps required to reduce I/I. An example of this approach can be seen in Part I.D.5 (Collection System Operation and Maintenance Plan) of the permit recently re-issued to the Springfield Water and Sewer Commission.

Regards,
Jack

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CT DEEP RESPONSE: Discussions with DEEP, EPA and Norwalk have determined that this is best handled under a DEEP compliance action (order) that includes the requirement for a Combined Sewer Overflow Long-Term Control Plan or a "Master Plan" that requires the review of the existing 002-1, Ann Street Siphon and approved I/I plan from 2018.

Received Thursday 10/8/2020 4:16pm

Dear Ms. Straut:

A copy of the above-referenced Notice of Tentative Determination and a copy of the draft permit were received from the Department of Energy and Environmental Protection (DEEP) via email by the Norwalk Water Pollution Control Authority (WPCA) on September 9, 2020.

The following are the WPCA's comments/revisions associated with the draft permit as presented:

1. PAGE 4, SECTION 4(E) and (I):

- (E): For clarity, separate the prohibited discharge with commas and insert bracketed text (i.e., "sludge deposits, solid refuse, floating solids, oils, grease, or scum, except for small amounts…)

- (I): For clarity, insert the following text in brackets "…other than that of natural origin except as may result [from the] discharge from a wastewater treatment facility…"

2. TABLE A – FOOTNOTE 5: Replace "disinfection" with "dechlorination".

Thank you for the opportunity to comment on the permit and to clarify intent and language.

Please contact me at 203/854-3242 if you have any questions or require additional information regarding this matter.

Sincerely,

Ralph Kolb, P.E.
Senior Environmental Engineer
Norwalk Water Pollution Control Authority
15 South Smith Street
Norwalk, CT 06855

cc:
WPCA Board of Directors
Anthony Carr, City of Norwalk (via e-mail)
Chris Torre, WPCA (via e-mail)
Mathew Todaro, Verrill (via e-mail)
John Marcin, SUEZ (via e-mail)

CT DEEP RESPONSE: Section 4(E) through (F) replaced by new DEEP language. Table A footnote 5 updated as requested.

Received Thursday 10/8/2020 6:05pm

Dear Ms. Straut:

On behalf of the Norwalk Harbor Management Commission, Norwalk Shellfish Commission, and Mayor's Water Quality Committee, we are writing in response to the Public Notice concerning the above-referenced application to the Connecticut Department of Energy and Environmental Protection (DEEP) by the City of Norwalk (the City).

As described in the Public Notice, the City has requested renewal of a DEEP permit authorizing the discharge of up to an annual average daily design flow of 18.0 million gallons per day of secondary treated municipal wastewaters to the Norwalk River from the City's wastewater treatment plant at 60 South Smith Street.

This matter was discussed during the October 1, 2020 meetings of the Water Quality Committee and Shellfish Commission attended by representatives of the Harbor Management Commission. It was agreed by all meeting attendees to request additional information from DEEP and the City concerning the application.

The commissions and committee are aware of plans and proposals that would increase multi-family residential density on and near the harbor. We therefore request that the City, as part of the pending permit renewal process, provide a statement concerning: 1) the capacity of the wastewater treatment plant to accommodate the planned and anticipated residential growth, including growth anticipated in the Plan of Conservation and Development; and 2) any resulting need and requirements for increasing the plant's capacity in the future.

Please be aware that the Norwalk Harbor Management Plan contains a number of provisions to protect and improve water quality in Norwalk Harbor. The plan also encourages and supports maintenance and upgrading of City wastewater collection and treatment facilities, as necessary, in accordance with best available technology, and supports the Department of Public Works' capital budget requirements necessary for continued effective operation and maintenance of the wastewater treatment plant.

Thank you for your attention to our request. We look forward to your response and to further discussions on this important topic affecting water quality in Norwalk Harbor. If you have any questions or require any additional information, please contact Dr. John Pinto, Chair of the Harbor Management Commission's Application Review Committee at (203) 984-5339 or pintoj@optonline.net.

Sincerely,

John Romano
Chair, Norwalk Harbor Management Commission
(203) 256-111 (mobile)
Pete Johnson
Chair, Norwalk Shellfish Commission
(203) 246-9771 (mobile)
Joe Schnierlein
Chair, Mayor's Water Quality Committee
(203) 858-7640 (mobile)

Cc:
Mayor Harry W. Rilling
Mr., Bryan Baker, Norwalk Planning and Zoning Department
Mr. Ralph Kolb, Norwalk Department of Public Works

CT DEEP RESPONSE: This appears to require a response by the City. DEEP would note that Section 4(B) of the permit states "No new discharge of domestic sewage from a single source to the POTW in excess of 50,000 gallons per day shall be allowed by the Permittee until the Permittee has notified in writing the Connecticut Department of Energy and Environmental Protection, Bureau of Water Protection and Land Reuse, Water Planning and Management Division, Municipal Wastewater Section, 79 Elm Street, Hartford, CT 06106-5127 of said new discharge. As part of that notification, the City/WPCA needs to let us know if they have capacity at the plant and in the collection system, the added flow cannot exacerbate any SSO issues they have in the collection system and, if there is going to be non-domestic flows, the City needs to make sure the builder/owner registers for a GP or SPDES permit from the Industrial Wastewater Section in the Water Permitting & Enforcement Division.

Received 11/2/2020 1:42pm

Good afternoon Ann,

A quick email to outline my questions from today's meeting.

(A) I am interested if there has ever been an effects analysis completed examining cumulative impacts from permitted sewage outfalls as part of the issuance of a NPDES permit.

(B) Understanding that there are certain allowances within "Zones of Influence", what is the responsibility of the permit holder when discharging into an impaired water body? More

specifically what is the course of action when the impairment encompasses both the ZOI as well as the rest of the waterbody in cases where the waterbody is an enclosed harbor or bay?

(C) Has there ever been **mitigation** required during a permitting or CEPA process for chronic inputs of nutrients and solids from a permitted discharge when these activities are identified as the primary source of the impairment?

Physical and chemical impacts include interruption of diurnal DO cycling, chronic hypoxia associated with high BOD and conversion of pre-discharge benthic sediments to post-discharge sediments characterized by high carbon concentrations and fine particle loading.

Biological impacts include reduction in biomass and diversity of aquatic species and fish kills.

(D) Finally, understanding that in CT SLR is taken into consideration when upgrading facilities with state funds, are the effects of warming waters on chemical processes within the ZOI and the impaired waterbody also considered?

Thank You,

Bill Lucey
Long Island Soundkeeper
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blucey@savethesound.org

CC: Roger Reynolds, Save the Sound (rreynolds@savethesound.org)
Katherine Fiedler, Save the Sound (kfedlier@savethesound.org)
Peter Linderoth, Save the Sound (plinderoth#savethesound.org)

CT DEEP RESPONSE: DEEP has lettered your questions for easier response.

(A) Yes, by looking at the effects of multiple discharges on a waterbody. CT DEEP requires chronic toxicity testing for waters that are impaired or dominated by discharges. Part of the chronic test requires testing of the receiving water upstream and downstream of the discharge. Water health as measured through the toxicity report. Ambient monitoring (program is run by Chris Belluscci) is completed for indicators of chronic and biological health. All of this is considered into whether there is an impact or impairment on the water. CT DEEP is just starting to implement the WQ based targets for P so must wait to determine effect(s). CT has a TMDL for N for LIS and all facilities have their limits. EPA and states will update model and

update the N TMDL for the open water sound. CT DEEP is starting studies in coastal embayments, so no basis for changing permit requirements yet for WWTPs until embayment studies are completed by that plant outfall or EPA updates LIS N TMDL. CT DEEP Will get to all the embayments eventually but cannot get them all at once. CT DEEP has partnered to do Statewide SPF testing with private groups including USGS year one. CT DEEP has hired a modeling contractor and there is testing of rivers and lakes. The Pawcatuck project with RI is the demo project for this. Using freshwater impact of nutrients and what goes down to the LIS. Mystic and Norwalk are the next 2 embayments to be done. MS4 program has additional requirement to manage stormwater and nutrients in stormwater that are discharging to P streams and N BMP installation. CT DEEP is using HSPF modeling – Hydrologic Simulation P Fortran. The model will provide a better basis for updating permit limits.

(B) The permittee's responsibility is to meet the permit limits whether MS4 or WWTP. If an impairment moves beyond the permit and requires a TMDL or if the cause is unknown, a study is performed to determine the cause and then CT DEEP floats a load allocation that gets incorporated in the permit(s). The permittee does not do anything. A watershed plan is made and then the TMDL is put into the permit during the next revision.

(C) Permits generally do not go through a CEPA process. Are you talking natural resource damages? CT DEEP does not put that in a permit. Chronic issues (not meeting effluent limits) will go into an order. Newly discovered issues (not meeting a metals limit) going into a permit during renewal. If a designated use is impaired, CT DEEP would determine the issue and then consider a TMDL.

(D) CT DEEP does not have a good model yet to evaluate and implement temperature changes however, the ZOI for thermal is not expected to be as large as the total ZOI

Received Saturday 11/7/20 1:07pm
Dear Ann Straut,

On behalf of Save the Sound, I submit the following comments regarding the renewal of the Norwalk Wastewater Pollution Control Facility NPDES Permit No. CT0101249. The Draft Permit makes some progress towards more protective effluent standards and CSO controls. However, the Draft Permit fails to adequately address the continued use of permitted and unpermitted CSO outfalls because of excess flows, or the nitrogen impairment of the inner Norwalk Harbor.

I. The Use of CSO Outfalls and an Emergency Bypass Outfall Indicate Excess Flow that Must be Eliminated, and Any Overflow Discharges Must be Properly Monitored.

Norwalk WPCA is frequently unable to either convey or treat excess flow during large storm events. Excess flow from storm events has resulted in sanitary sewer overflows from the collection system. Norwalk WPCA also maintains three outfalls to relieve the collection system and the treatment plant of these excess flows: 1) Outfall 002-1, a permitted CSO outfall; 2) the Ann Street Siphon emergency bypass outfall, an unpermitted outfall effectively functioning as a CSO outfall; and 3) a recently discovered CSO outfall located at 21 Wall Street, for which plans for permanent closure are currently being developed. The NPDES Permit is one avenue by which these outfalls can be regulated by CT DEEP. In order to ensure that Norwalk WPCA continues to make progress towards properly conveying and treating all of the sewage and stormwater influent, Save the Sound urges CT DEEP to consider the comments herein.

The continued use of these outfalls indicates that the collection system and treatment plant cannot convey high flows during storm events, resulting in the discharge of raw or partially treated sewage into Norwalk's waterways and Long Island Sound. It is critical that there are long-term plans to reduce these excess flows and eliminate the use of these outfalls. One component of this is, indeed, required by the Draft Permit: "The Permittee shall reduce excessive infiltration/inflow to the sewer system."[1] Norwalk WPCA has pushed back on part of this obligation in correspondence with EPA, stating that it does not need to eliminate private and public sources of inflow.[2] EPA, by contrast, states that these sources of inflow contribute to excess flow, and pose environmental and public health risks, therefore they must be removed.[3] Certainly, inflow is just one factor that results in excess flow that cannot be conveyed or treated. Norwalk WPCA also suffers from structural failures throughout its system, as evidenced by the causes of its sanitary sewer overflows.[4] Therefore, infiltration may play a substantial role in any issues of excess flow. Systematic plans for the elimination of discharges from CSO Outfall 002-1 and the Ann Street Siphon Emergency Bypass Outfall must be developed and promptly implemented.

a. CSO Outfall 002-1

Outfall 002-1 is a permitted CSO outfall, located at the sewage treatment plant. Excess influent is directed to the Supplemental Treatment Facility where it is temporarily stored in Chlorine Contact Tank (CCT) No. 2. This flow is then either discharged through Outfall 002-1, or redirected back to the Preliminary Treatment Facility. The Draft Permit authorizes Norwalk WPCA to discharge from Outfall 002-1 "[w]hen influent flows exceed 30 MGD, in response to wet weather flow, i.e. rainfall or snowmelt conditions."[5] However, this allowance ignores a key function of the Supplemental Treatment Facility and the CCT No. 2, which can hold nearly 500,000 gallons.[6] According to the WPCF Outfall 002-1 Control Plan, if the flow can be contained in the CCT No. 2, then it can be "redirected to the Preliminary Treatment Facility upon completion of the wet weather event for full treatment."[7] Save the Sound requests that the NPDES permit require the redirection of any flow stored in CCT No. 2 to the Preliminary Treatment Facility for full treatment, when possible, before resorting to discharging that stored excess flow directly from Outfall 002-1. Section 9(A)(3) should read: "When influent flows exceed 30 MGD, in response to wet weather flow, i.e. rainfall or snowmelt conditions, and

flows stored in CCT No. 2 cannot be redirected back to the Preliminary Treatment Facility, the Permittee is authorized to discharge from outfall serial number 002-1, chlorine disinfected primary treated combined sewer wastewater." This will ensure that the full capabilities of the Preliminary and Supplemental Treatment Facilities are utilizes to treat influent as comprehensively as possible, even during storm events.

The Draft Permit only requires the sampling of Outfall 002-1 effluent when the overflow event is longer than one hour.[8] It is critical that the environmental impact of any discharge of partially treated sewage be understood. Save the Sound seeks information as to the volume of effluent discharged during overflow events that are less than one hour. Depending on that information, we request a reconsideration of whether shorter, but high volume, overflow events from Outfall 002-1 should also be sampled.

Finally, Save the Sound seeks to understand whether there is a long-term plan for the closure or elimination of the use of Outfall 002-1. Treatment with chlorine does not comply with water quality standards and is not a viable long term solution. Partially-treated sewage has been discharged from Outfall 002-1 eight times since January 2019.[9] Save the Sound urges that a plan be developed, incorporating a comprehensive approach to ensure that all flows can be conveyed and fully treated.

b. Ann Street Siphon Emergency Bypass Outfall

Norwalk WPCA also operates the Ann Street Siphon Emergency Bypass Outfall, which operates functionally as a CSO outfall. This outfall is unpermitted. The Emergency Bypass Outfall is located directly across the Norwalk River from the wastewater treatment facility and is used when the sewage collection system and potentially the treatment plant is overwhelmed by excess flows during storm events. While infrequently used, the need for maintaining the emergency bypass outfall is indicative of excess flow in a system that cannot effectively convey or treat that flow. When this outfall is used, raw sewage is discharged directly into the Norwalk River – an unacceptable outcome, regardless of how rare the event may be.

The use of the Emergency Bypass Outfall needs to be eliminated, and the outfall shuttered. In correspondence from EPA dated February 27, 2018, the EPA requested that Norwalk WPCA "revise the I/I Control Plan to provide a plan, with implementation schedule, for permanently closing the overflow at the Ann Street siphon."[10] Norwalk WPCA responded that they could not close the outfall because it is needed to protect the treatment plant during emergency conditions.[11] Save the Sound understands that overwhelming the plant infrastructure is not a good solution for environmental and public health, but the discharge of raw sewage into the Norwalk River because excess flow cannot be appropriately handled is not an outcome we need to accept. Save the Sound requests that DEEP impose strict penalties for any overflows from this outfall, in order to disincentive its use, or conversely to incentivize the appropriate projects to eliminate the need for the outfall. It is our understanding that such penalties have not been issued for any recent use of this unpermitted outfall.

We request that CT DEEP require Norwalk WPCA to develop a plan for the closure of this outfall. One avenue to facilitate the elimination of the use of the Emergency Bypass Outfall may be to permit the outfall as a CSO in the NPDES permit. This will allow for strict delineation of its use and could allow for its incorporation into Norwalk WPCA's Long Term Control Plan. As a permitted CSO, DEEP must require certain monitoring and sampling of any discharged effluent. If the Emergency Bypass Outfall remains unpermitted, it exists outside of clear regulatory guidance for its use and elimination, with the only remedy being penalties for discharges. Instead, we must work towards a solution with true on the ground outcomes for the environment.

c. Other CSO Provisions

The Draft Permit removes the following provision: "The sewage system shall be inspected and maintained such that deposition of solids and/or other obstructions does not cause restrictions in flow resulting in unnecessary wet weather overflows and to ensure that dry weather discharges are not occurring."[12] Save the Sound seeks to understand the justification for the removal of this requirement.

II. Norwalk WPCA Causes or Contributes to Water Quality Standard Violations in Inner Norwalk Harbor

DEEP should address the water quality impairment to the Inner Norwalk Harbor and should not allow the WPCA to cause or contribute to Water Quality Standard violations in the Inner Norwalk Harbor.

Pursuant to R.C.S.A. Sec. 22a-430-4(p)(2)(A) and 40 C.F.R. Sec. 122.44(d) the commissioner must deny a permit if she cannot ensure that the discharge, either singly or in combination with others, would be consistent with the state's Connecticut Water Quality Standards.[13] In this case, according to the 2020 Integrated Water Quality Report issued by CT DEEP, the Inner Norwalk Harbor is listed as not supporting Aquatic Life, Recreational or Shellfishing uses. The causes for the Aquatic Life impairment have been determined to be Dissolved Oxygen, Nitrogen Total, Nutrients, Lead, and Mercury. The cause of the Recreational use impairment has been determined to be enterococcus.

While the state has issued a General Permit for Nitrogen Discharges, which the Norwalk WPCA participates in, the General Permit addresses an impairment in the central waters of Long Island Sound. The permit does not address water quality impairments in specific waterbodies or estuaries such as the Inner Norwalk Harbor and DEEP has retained full authority and responsibility to meet these Water Quality Standards through specific limitations in specific permits.

Moreover, we know that nitrogen discharges from the Norwalk WPCA are causing and contributing to these violations with respect to dissolved oxygen, total nitrogen and nutrients. . According to a 2016 study of embayments across Connecticut, approximately 65% of the nitrogen impairment for the Inner Norwalk Harbor can be directly attributed to the sewage treatment plant.[14] Comparative analysis and model development for determining the susceptibility to eutrophication of Long Island Sound embayments.[15]

We understand that Norwalk Harbor is one of the embayments targeted by CT DEEP in the Integrated Water Resources Management plan and that there will be a comprehensive study going on to determine the precise contributions from each of the sources of the Inner Norwalk Harbor aquatic life use impairment. Save the Sound fully supports this approach. In the meantime, however, because the Norwalk WPCA is such a significant contributor, and will be causing or contributing to the impairment during this permit cycle, we suggest that DEEP analyze preliminary measures the Norwalk WPCA could take to optimize its operations or otherwise reduce or nitrogen discharges while the study is ongoing. Moreover, if the reason that a Water Quality Effluent Based Limitation is not being issued at this time because of uncertainty, we believe the Norwalk WPCA should be required to conduct monitoring and other studies to determine the extent of the plant's contribution to the impairment to be consistent with Connecticut and federal regulations.

III. Conclusion

Thank you for your close attention and consideration of these comments. Save the Sound looks forward to discussing these concerns and proposed solutions with CT DEEP and Norwalk Wastewater Pollution Control Authority.

Respectfully submitted,
*/s/ Katherine Fiedler_*

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FOOTNOTES:
[1] Draft NPDES Permit No. CT0101249 § 9(A)(7).
[2] CH2M Engineers, Inflow and Infiltration Control Plan, prepared for Norwalk Water Pollution Control Authority §§ 7.3, 8.1 (Dec. 2017, rev. June 2018).
[3] Letter from EPA to Norwalk Water Pollution Control Authority 3-4 (Dec. 21, 2018).
[4] *See* Connecticut Sewage Right to Know reported bypasses.
[5] Draft NPDES Permit No. CT0101249, § 9(A)(3).
[6] WPCF Outfall 002-1 Control Plan at 4.
[7] WPCF Outfall 002-1 Control Plan at 1.
[8] Draft NPDES Permit No. CT0101249, Table A-1, n.3.
[9] *See* Connecticut Sewage Right to Know reported bypasses.
[10] Letter from EPA to Norwalk WPCA at Attachment-1 (Feb. 27, 2018).
[11] CH2M Engineers, Inflow and Infiltration Control Plan, prepared for Norwalk Water Pollution Control Authority § 6.1.4 (Dec. 2017, rev. June 2018)
[12] NPDES Permit No. CT0101249 §9(A)(8).
[13] R.C.S.A. § 22a-430-4(p)(2)(A); 40 C.F.R. § 122.44(d).
[14] Vaudrey, J. M., Yarish, C., Kim, J. K., Pickerell, C., Brousseau, L., Eddings, J., & Sautkulis, M. (2016).
[15] Connecticut Sea Grant Final Project Report, 38.

CT DEEP RESPONSE: I. Discussions with DEEP, EPA and Norwalk have determined that this is best handled under a DEEP compliance action (order) that includes the requirement for a Combined Sewer Overflow Long-Term Control Plan or a "Master Plan" that requires the review of the existing 002-1, Ann Street Siphon and approved I/I plan from 2018.

See responses to Bill Lucey regarding the testing and TMDL development for embayments.

Internal request
Received Mon 11/16/2020 5:51pm
Hi Ann,

Hope you're doing well. You may have heard that we have initiated a study (monitoring and modeling) of Norwalk Harbor. We recently received input from the modeling planning contractor regarding sampling needs. The contractor noted the importance to monitor the WWTP effluent for several parameters. These parameters include BOD, NH3, NO2, NO3, TKN, TP, PO4, TSS. I took a quick look at the draft permit (9/20) and found that all the parameters of interest are included and the frequency of sampling should be sufficient. This is great.

However, should these parameters be omitted or sampling frequency reduced, please let me know. In that event, we would like to express the importance of retaining them as is.
Thanks,
Kelly

Cc: Traci Iott

Follow up received 12/1/2020 3:24pm
Hi Ann,

I just wanted to follow-up as Traci reminded me that we also need CBOD analyses from the WWTPs for modeling efforts. I see that the draft Norwalk permit includes CBOD which is great, however the frequency is once per month. Do you know how it was decided to analyze for CBOD once per month as opposed to weekly or bi-weekly? I'm wondering if we could approach the plant to increase CBOD monitoring to biweekly for a 2 year period while we are studying Norwalk Harbor. Any thoughts on that?

Kelly

Cc: Traci Iott

Kelly Streich
Long Island Sound Study
Water Planning and Management Division
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CT DEEP RESPONSE: Although the request was made after the comment period closed, CT DEEP does not believe there is a hardship in in requiring the WWTP to perform two CBOD samples per month. The draft permit will be changed to reflect that.