

Received: Tuesday, January 12, 2021 7:10 PM
From Michael Simons of Westport:

Dear Ann,

I would like to submit a comment in regards to the Norwalk WPCA NPDES permit.

I would like to see an evaluation of the use of the permitted Combined Sewer Overflow outfall (Outfall 002-1), unpermitted Combined Sewer Overflow outfall (Ann Street Emergency Bypass Siphon), and inflow/infiltration and old pipes in poor condition in the system that cause other overflows. I would also like to see Norwalk develop long term plans to ensure these issues are studied and addressed along with proper/comprehensive monitoring of the use of the permitted and unpermitted CSOs.

Because Inner Norwalk Harbor has consistently been shown to be impaired for nitrogen, we feel the WPCA should be required to monitor the water quality to provide information for creating a plan to restore the harbor.

Michael Simons

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” which requires the review of the existing 002-1, Ann Street Siphon and approved I/I plan from 2018.

Received: Thu 1/14/2021 7:01 PM
From Mike Pipa of Norwalk:

Dear Ann Straut. My Name is Mike g Papa. I live in Stamford at 49 bouton st East Stamford ct 06907. 203-252-1945. I am sorry for being denied To partecipate at the public hearing few hours ago ! The moderator did not give me a chance to SPEAK !! .. Ann , at this time I like to state that

I am neutral regard issuing or not issuing a permit to the city of Norwalk . I am sure they are performing the best that they can under the present circumstances. However.. I propose to look at this issue in a completely different point of view . 1) We are all well aware about the projected population growth 2) we are all well aware of the extreme weather challenges we are dealing right now with a real risk of even becoming worse for the near future , 3) we know that the costs of the way we run the WPCA it is very high today and can become prohibitive for

years to come . 4) we all know that our Long Island sound cannot digest the gray water coming out from the WPCA as well as the living soils ecosystem can be able to do . Therefore I suggest that we engage in a PROACTIVE strategy to use the gray water for multiple uses like watering parks , lawns , flush toilets and industrial uses rather than polluting the sound ! To continue with this strategy of continuously polluting our sound I feel that in few years it will become very polluted just like the SOUTH BRONX ocean is today ! . As the population grows we all must step up to the plate and defend the integrity of nature for the health and well being of future generations. A failure in this regard will make all of us suffer the consequences of increasing chronic diseases , plus the remediation costs associated with this ecological failures will grow through the roof with a real risk of jeopardizing our free way of life . I urge everyone to partner with nature and it's nature LAWS to help us reduce costs and improve the health of future generations. There is no waste in nature ! However we must work with nature in order to benefit . Today just for the money strategy it is failing miserably. . Sincerely Mike g Papa.

Sent to Janice Deshais Thursday, January 14, 2021 5:40:54 PM

My name is Mike g Papa. Just a few minutes ago I was NOT GIVEN THE OPPORTUNITY to speak at WPCA permit public hearing. I am very disappointed that your behavior in this matter it was very discriminatory ! (((. You were well aware that I was waiting to speak but you did not call me !))) . Anyway your approach will eventually cost us lot of money. You might probably continue to have your cushy job at our expense! However , we all know that as the population grows we will eventually create catastrophic Epic ecological damages to our state and to our country ocean, environment and people health, plus there is a real risk of putting our great free way of life in jeopardy ! ((The request I was going to make was to use the gray water coming out from any WPCA for non drinking water purposes)) . It can be used to water parks , flush toilets, for industrial use  and much more, except as drinking or farming. However it should not be released into the Long Island sound any longer , regardless of the expensive treatments your group suggest. The Ocean biology it is not able to digest the nutrients and metals as well as the SOIL . . The way we operate right now , the sound will become polluted just like the south Bronx . as a result of the population continuing growing . I am sorry for our future generations of people that will eventually suffer the consequences of polluting and chronic diseases will grow at new records. . the reactive approach of just pumping moneys rather than using a proactive one it is a long term problem that we will PAY 💰 ! Your approach it will Fail MISERABLY in the long run. . You are aware of it therefore you do not want hear the TRUTH from the honest PEOPLE like me . This is the real reason you did not give me the opportunity to speak ! Sincerely Mike g. Papa 203-252-1954.

CT DEEP RESPONSE: Some grey water usage has been authorized in the State of Connecticut under a beneficial use determination authorization for watering of golf courses. That type of use is not covered by this permit. If the City wishes to pursue such a use, they will have to

contact the Bureau of Materials Management and Compliance Assurance, Solid Waste Permitting Unit at (860) 424-3372.

Received Thu 1/14/2021 8:31 PM
From Louise Washer of Norwalk

Dear Ann Straut,

I am writing on behalf of the Norwalk River Watershed Association to thank you for your presentation this afternoon regarding the renewal of the Norwalk Sewage Treatment Plant's NPDES permit and to offer comments on the proceedings.

Though Norwalk has done a commendable job of improving wastewater management over the last decade, especially in its partnering with Harbor Watch to track down leaks, as we heard today, it is unacceptable that the city continues to be unable to fully convey and treat its sewage, relying on an outfall where they are permitted to discharge undertreated sewage, an unpermitted outfall where raw sewage is discharged under extreme conditions, and frequent overflows from various other areas of the collection system itself.

I was glad to hear that your office will be requiring the city to address the first two of these issues, as I believe you stated, and I would like to know if the public can be informed as to the timeframe DEEP determines by which these improvements must be made.

Our organization works tirelessly to try to improve water quality in the Norwalk River and Norwalk Harbor by encouraging people to avoid fertilizer and pesticide use, maintain their septic systems properly, conserve water, plant riparian buffer zones, reduce lawn size, etc. We count on the municipalities in the watershed to manage point-source pollution.

The threat of larger and more frequent storms resulting from climate change means it is all the more urgent that the city be required to act now to make the improvements necessary to avoid the spilling of raw or partially treated sewage into the Norwalk River, Harbor, and Long Island Sound.

Because the Inner Norwalk Harbor has consistently been shown to be impaired for nitrogen, we feel the WPCA should also be required to monitor the water quality to provide information for creating a plan to restore the harbor.

Thank you for the chance to comment on this issue.

Sincerely,

Louise Washer, President, Norwalk River Watershed Association

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" which requires the review of the existing 002-1, Ann Street Siphon and approved I/I plan from 2018.

Regarding your request to be informed of the timeframe by which these improvements (mentioned above) will be made, DEEP mentioned during the meeting that the public should ask the City of Norwalk to put up a webpage covering the timeline of when projects will be implemented and when they are complete. It is also not unheard for a WPCA to have a yearly update public meeting to keep the public informed of their progress. Save the Sound may also be a good source for this type of information.

RECEIVED: Thu 1/14/2021 during the Norwalk Public Hearing
From Kat Fiedler of Save the Sound:

Thank you for everyone for your really detailed presentations today. Those are top notch and really gave us a lot of information to go on so I appreciate the time that was put into giving us that information. I'm going to be really brief on my comments as Ann stole my thunder, a little bit by responding to a few my comments already. And we did submit written comments, so I'll just review a few things and a few questions that I haven't heard addressed yet.

Save the Sound is concerned with the capability of the city to properly convey and treat all sewage that enters the system. We've seen reliance on outfall 002-1 and Ann Street which I know has not been used for a few years now, and there have been overflows from the collection system.

We know that Norwalk is making regular investments in their collection system. We heard a lot of those projects. Today, we also know about just to the investment that projects that are being done and the progress that has been seen averaged over the last few years.

But we are seeing overflows. And when you look at the overflows that are reaching water bodies. They are still have a concern, and I think smart minds can all agree that your disagree on the pace of progress. We want to see on that. Save the Sound wants to make sure that there's a comprehensive view of the system as a whole to make sure that we're prioritizing the right projects that we're capturing what needs to be done, rather than just responding to emergency situations as a way to identify projects.

We also want to point out that while the average flows might be declining slowly over time, which is again excellent to see we are talking about acute events with high flow events during storms and we expect to see increased size of storm events over the next few years, from our new climate regime as much as maybe 2020 was not representative of that so we are pleased to see the few overflows that we saw in 2020 but we should continue to look long term as we see our climate fluctuate or weather events fluctuate in our climate increase the storm events, we need to be prepared for what we face in the long term.

We are definitely pleased to see Deep's response in terms of pursuing the long-term control plan or the collection system review to look at the use of those outfall that kind of our backup for when we have access flow events. So I appreciate the attention being given to that issue.

I wanted to just probably ask a few questions. This might be too in the weeds for Ann addressing them today. I do expect that Norwalk, and the agency have considered these questions, but I want to repeat them just since I have not heard direct information on them.

In this hearing. The first is regarding the, the use of outflow 002-1 and to make sure that we are properly monitoring it and also using it to its fullest capacity and I did write in detail about this in my comments and I'm just going to summarize quickly. I understand that sampling of just charges from the outfall are only required when the overflow overflow event is greater than one hour seek understanding of the volume of sewage discharge through that outfall in a shorter overflow event that justifies that cut off for monitoring. I know you know if you have a very, very brief overflow event likely the impacts to the environments are minimal but say for example, if we have a 59 minute overflow EVENT. Are we seeing significant impacts to the environment should that cut off for sampling be lower. for a shorter time event. And I know that there's definitely capacity to look at the volume being discharged during those events in the past. So I'd seek some explanation on that in the response to comments if that's possible to justify whether or not we can reduce the time of overflow. That is sample. So we have the information to really empower these choices.

My second comment on the use of outfall 002-1 requires a bit of confirmation of my understanding, but I understand that when that chlorine tank is used during high flow events, that sewage could be redirected for full treatment to the plant. And I understand that from some engineering reports the permit right now does not require the redirection of sewage back to the plant for full treatment. It is allowed to be discharged directly from 002-1. I would request that the permit consider the full capacity of the treatment plan to make sure that we're using all opportunities to do full treatment. And again, I see confirmation on my understanding of that as well. And their response to comments so just wanting to make sure that we engage with the full functionality of the treatment plant and that perhaps might be how its functioning today just not as it is written in the permit.

Another more technical question on the different matters that there was a condition that was removed that requires inspections and maintenance to prevent blockages and subsequent overflows. Well, I know that the PCA is engaging with that. I was wondering the justification for the removal of that permit condition if that can be explained as well that would that would provide some clarity for our organization.

And finally, I don't want to assign too much fault or wait to an administrative area that's what happened. But I know that the WPCA rediscover the Wall Street CSO recently and they are making efforts to investigate. how it functions and the closure of it, but it certainly you know sparked a little concern as to what others efforts to review the whole system to make sure that there were no other kind of gaps in the knowledge of the CSOs that still exists, maybe still operate. To make sure that there are no other errors. So again, not to assign too much fault to that. But if there's a review being done to confirm that there's no other issues, similar to that we'd certainly be interested to hear about that as well.

I think that's it. Given what else has been covered in today's hearing. I know that bill Lucy, the sound keeper is also on this. In this hearing. I don't know if he has any comments, but I'm sure he'll chime in. At some point in this process. If he does, so I again appreciate the presentation and all the information provided today.

CT DEEP RESPONSE:

Discussions with DEEP, EPA and Norwalk have determined that a comprehensive view of the system 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 the approved I/I plan from 2018. A review of the full collection is expected. In addition, a wastewater treatment plant facility will also be completed. This will ensure that the correct projects are prioritized and that a comprehensive overview of what needs to be completed is captured. The wastewater treatment plant facility plan is the best place to review the full capacity of the plant and to ensure that all opportunities for full treatment are met.

In regard to sampling 002-1 at a lesser time frame than one hour, it would be difficult to get adequate volume for testing for a short bypass event since the treatment plant personnel will not know that the event will be that short. Personnel would risk filling the autosampler on the first sample and have no volume left for the rest of the event should it last longer.

From Richard Harris of Westport:

I'm from Westport. Marlina Westport, and I just give you a quick amount of background without getting too bogged down here. I started harbor watch back in 86 At the Westport nature center now called replace and I have a green room sciences from Stony Brook. I was. I work for Shell Oil for and shall chemical for 27 years and decided to see what kind of impact. I can make on a local basis so We raised a pretty good organization and our Forte basically is testing water and we started off by heavy emphasis on bacteria accounts in Various water systems all Carver has had extreme love and care from us for episode 86 we monitored every year auctions letting the temperature monitors star brains and and doing all this we Became Interested in the amount of storm brain passage of sewage for broken pipes and we found two very large systems broken down. One was at school st back in late 1990 And another one was out at the CAF after pH, about three years later. And both of these, we discovered them. Report them to the city and the city made instant repairs that started a long term relationship that's still going on today. We have progressed in that we monitored 10 continuously running strong grandson in Norwalk harbor and when they one of them shows a high bacteria account. It's usually Sewage input infiltration from a broken pipe or something of that nature of the relationship grew very strongly. Well, once Ralph Kolb came on the scene. Ralph has been very responsive to anything that we find we're constantly looking for bacteria input. And based on all that we got an own laboratory certified back in the late 90s. With the state and we've continued to grow I retired in 2014 and it turned it over to Sarah Crosby, who is now done the same thing and Norwalk is a model harbor.

In terms of citizen involvement and it's not only us and not only harbor watch His eternal blue from norm bloom where I presently work. It's the Norwalk River watershed. With Louise Washer. Who was he was diligently along with harbor watch taking care of the Norwalk river and monitoring input their nitrogen, phosphorus, bacteria, etc. And we surely will have a report out on Norwalk harbor showing what the physical data was for this year.

And I just want to say that over the years, slowly but surely it has improved, year by year, when I first started doing this 96 we had 50 kills down the in harbor itself that you could walk across And the overall condition of the harbor in terms of oxygen is gradually improving from certainly from what it was, and also the work this to put in an oil to a treatment plan. Is exemplary it's made a huge difference. So I just want to say that all these organizations are continuing to work. In partnership is ongoing. It's a model for the rest of coast. There's no other city that has this level of support from from Citizen groups. And Sarah Crosby has continued to that upward movement into Stanford and other cities along the coast, as well as in Atlanta cities. So I just want to thank everybody at the wastewater treatment plant. For the partnership their help and I actually did nothing but I continue into the future. Thank you.

CT DEEP RESPONSE: No response required.

RECEIVED: Thu 1/14/2021 during the Norwalk Public Hearing
From Geoffrey Steadman of Norwalk:

Yeah, and I guess I'm a representative of the Norwalk harbor management Commission today and I live in Norwalk, and As you know, the city has a harbor management plan that was adopted by the Common Council and approved by the State of Connecticut and that plan includes a number of provisions for protecting and enhancing water quality in the harbor. Commission works very hard in conjunction with the shellfish Commission and also with the mayor's water quality committee. chairman of that committee. Mr. Shearer line is also listening. I believe that the harbor management planning. Supports and encourages the continued maintenance and upgrading is necessary, of the wastewater treatment plant in accordance with best best available technology and also supports. The capital budget request. So the DPW and WPCA to to continue to improve the plant and, among other things, the plan. Supports the monitoring that Mr. Cole, when Mr. Carr talk about today to to track down sources of pollution and to continually monitor discharges. So although a lot of this. We very much appreciate the good presentation and and the detail and a lot of it, of course, to not that we're not sanitary engineers, but we haven't been aware of, of problems with with the operation of the treatment plant that require immediate attention but but Again we partner Commission is responsible for oversight of the harbor management plan.

We did write a letter back in October of this year that was signed jointly by the harbor Commission the shellfish Commission and Mr shinier line from the water quality committee. And we just asked as part of the public record of this this hearing that there'd be a clear statement about the capacity of a plant. To handle future developments, such as anticipated and planned in Norwalk, and what sort of future Improvements or expansions may may be necessary. We've heard some of that in the presentation today. But I think that that would be part of the clear record of this of this hearing. And then, just briefly, you know the history of this going back over many years is interesting to see the date of 1931 when the plan was built.

Because you know that night in the late 1920s to stay close the shellfish beds in Norwalk harbor and as a result the shellfish industry sue the city. And the concern, then, was it was the pollution emanating from the CV web and you dump, which is now veterans park so you know this, this has been a constant matter because as Miss Mr. Cole mentioned Norwalk shellfish resources are generally considered the most valuable in the state and they depend on, clean, clean water. So that history of the concern about the treatment plan and then we go back 30

years with the with the development or the initiation of the sound cheaper program. And that was directly tied with with concerns over the wastewater treatment plant. So this is a continuing process to maintain and improve water quality in Norwalk harbor. So I just wanted to make make it clear that the the authorities in the interests of the shellfish Commission and the harbor management Commission. Toward toward war working towards, clean water, improving water are clearly recognized by all of the participants in this project in this process.

And thank you for the very detailed presentation early on that, that concludes my comments we will probably have some more to to to present within the comment period, but the. Thank you.

CT DEEP RESPONSE: DEEP defers to the Norwalk WPCA to answer the questions regarding capacity and ability to handle future loads as the city allows more structures.

RECEIVED: Thu 1/14/2021 during the Norwalk Public Hearing
From Diane Lauricella of Norwalk:

All right, I'm having trouble with

Just stay to get my

I'm sorry I Just Wanted to thank The department. For having Me.

We Have been attempting conditions can be And possibly can gather more on it. I do is take take off the video. Okay, make it cool. Lastly, the two and two last things

The Wall Street CSO that was rediscovered I have lived in Norwalk for 34 years 35 years going on 35 their husband over the years. Older problems and leakage issues for a very very long time. The street is opened up, they even get to see the old trolley tracks and they close up the, the whole and then Shortly, there are more problems. So I'm very happy that there is a whole Concerted effort to get rid of this particular problem because it is an economic development issue. In addition to the environmental threat. That it plays with our upper harbor, which is already having issues. Um. Lastly, there is a issue that is indirectly related to this. Water pollution control plan, and I very much appreciate the presenters overview of what this site looks like. But after it goes through The chlorination stage, etc. There is a wet sludge holding building that I believe was inadvertently left off of the diagram. And that particular wet sledge holding building creates horrible odors as the garage door opens up Because we still have a force a disposal issue, that of course is part of the very functioning of this sewage treatment plant related to the company that is currently picking up the what sludge every time they open

the sludge building the older set of accumulated Come out into the neighborhood. I want to live very close to this facility and I couldn't believe he smell. I know it is an ongoing problem, I would like to know what is being done. With the statuses because over the years before Mr. Carter came on board. We were constantly promise if that would be fixed also an OSHA issue. By the way, for the people working at in that particular situation.

So I thank you all for your work and I especially appreciate attorney. I'm also speaking just for some quick background, especially for Mr Carr, who does not know me, I'm the founding president of North River watershed Association, the one of the original harbor management Commissioners. When Bill Collins received the order from the EPA to form that emission and I helped write the original harbor management plan. And I'm still here in Norwalk, so I'm very pleased that we're having this informational meeting today. I'm glad. We're going to work together. But I think that the public, of course, needs to be able to weigh in without fear of retaliation or retribution. And also we need to make sure that we have those checks and balances and that's what saved the sound and earthquakes provide and I'm very pleased for that. Thank you so much.

CT DEEP RESPONSE: Unfortunately, the NPDES permit does not address odors or odor control at the treatment site. If the odors are an ongoing issue, DEEP recommends contacting the Air Bureau at (860) 424-3436 or deep.aircomplaints@ct.gov to file a complaint. DEEP will be sure to take the wet sludge holding building odor issues into consideration when the wastewater treatment plant undergoes facility planning for the future.

RECEIVED: Thu 1/14/2021 during the Norwalk Public Hearing
From William Lucey, Soundkeeper of Save the Sound:

Yeah hello bill go Long Island Sound. Keep for with a save the sound. And that was a an excellent presentation all around and and I really appreciate your concise delivery. Very well done. And I acknowledge all of those points in support of what the Norwalk W PCA is doing with their partners, but how we approach these situations is very empirical We gather data directly from the sewage right to know website that is populated by deep that puts all bypasses out there for the public to digest. We do this annually. We count up the number by town across the entire coastline and that's how we direct our energies we go to the communities that had the largest number of SSOs CSOs are obviously an ongoing problem. I do lot of knowledge, having grown up in that area and fishing all over that zone that the Central harbor and the outer harbor spare actually where the shellfish are have seen incredible benefit water quality from all the work that Dick Harris was talking about. Especially since it's located in the western sound. It's actually been a, it's been a pretty good story out there. We still have issues

through our Long Island Sound report card. I don't want to get into that in too much detail here. We're going to meet with the mayor's water quality commission. I believe in February, with our water quality manager to go over those details. But we still have some issues in the inner harbor. It got very poor grades on the water quality parameters. Now, part of that is geography.

You know title wedges. There's, there's some natural features that make it more challenging. We see that BlackRock harbor, we see that in the western end of the sound.

By throbs neck so you have to do a really excellent job to impact that and deep is in the process of going through some of these harbors now and doing a really

In depth nitrogen assessment we we really hope that the plant is involved with that.

Sampling and the harbor and we also have to acknowledge the upstream situations you know we have a wastewater treatment plant Ridgefield

So there are nitrogen sources coming down their septic up their lawn fertilizer and Louise washers group is putting in grants actively to work on dealing with those issues. So I think overall, everybody's on the same team everybody's working towards the same goal.

And we just like Diane said we just, it's our it's our job to to monitor these through public record and through our own monitoring programs, which is, which is why we requested to hearing but

I just wanted to once again thank WPC for that very detailed report that they gave us well. Very well done. Thank you.

CT DEEP RESPONSE: No response required.

RECEIVED: Thu 1/14/2021 during the Norwalk Public Hearing
From Louise Washer of Norwalk:

Yes, I have a question is, Louise washer. I can't trust.

Don't think I can turn my video on but I just have a Question.

Um, I guess maybe this is a question for Ann but she did mention a couple of Requirements that I guess deep is going to have for Norwalk to make changes that the primary treatment would be returned to the and St outfall And then the bypasses would be permanently closed from that and St outfall. I was just wondering how the public can follow up on those statements like,

Where can we check on the progress you said they were going to be Discussing what would be a timely manner. I just want to find out where that information will be for us if we want to follow up. And is that something you're able to answer today.

CT DEEP: Enforcement action is considered private until it's enforced. So I'm not sure how much of it we would share ahead of time. I can tell you that we would require something they would give us a timeline, we could probably do an informational meeting on the timeline. Like I could work that out with Kat and save the sound. But otherwise, for enforcement there's generally not a lot of input. Especially if we do it with administrative order.

Louise Washer: I mean i i think that the public would appreciate a planned update like that, even if it were to say, you know, nothing has happened yet, just so we can stay abreast of what's up.

CT DEEP: You could suggest to Norwalk that they put up a website with all that information.

Louise Washer: I will do that. And I wanted to add since the Ridgefield plant was mentioned, they're in the process of upgrading that plant now and it will include denitrification. So yay.

Correct good things happening.

Thanks, thanks for

CT DEEP RESPONSE: DEEP answered the question at the meeting but will reiterate that enforcement is confidential until it finalized. Two suggestions would be informational meetings to update the public once a year with the WPCA presenting what they've done and what is left. The second would be for the City to have a project page letting the public know where they are in relation to all the projects they mentioned and any enforcement that is ongoing from DEEP or EPA.

RECEIVED: Wed 1/20/2021 4:11 PM
From Lynnelle Jones of Norwalk:

Dear Ms. Ann Straut,

I speak for many longtime Norwalk residents. We care about ESG issues and believe climate change has increased severe weather events, including higher tides.

The City of Norwalk has had an uneven and inadequate approach to water waste treatment. This is not Singapore, sadly. Identifying and avoiding outright polluting have been political

priorities, lots of talk, but a lack of leadership understanding, and training has resulted in little action. For the past 35+ years we have watched the City of Norwalk respond to emergencies, be reactive, not proactive. There is little long-term planning shared with the public, only sporadic and low- quality public education and questionable accountability (Imagine asking a question and being told that even a FOI request would be denied in case I was a terrorist seeking information to disrupt operations!). Sometimes we wonder if the fox is guarding the hen house. We cannot get Mr. Anthony Carr on the phone; he, like many Department Heads in Norwalk, have junior staff people speak with the public. If an area is not covered by City Sewer, like my neighborhood, then reported outflows of pollutants are just ignored. "Not my job, that is DEEP's job", is what we hear. Unless required, actions will not change, thinking will not change. Today the school system has poor education about water waste, local politicians complicate and obfuscate issues for residents, but your re-thinking, re-writing this permit could change everything; a strong permit could align interests, promote public education and create transparent checks and balances.

Now is the time to hold the Norwalk WPCA to higher standards. The fact that the City of Norwalk WPCA and its environmental partners "just found" an illegal CSO that's been in operations since the 1930's makes it clear that higher standards need to be set and enforced as soon as possible.

Permits are records used to ensure best practices. Thank you for your presentation on the permitting process, the hearing on January 14, 2021, your comments regarding enforcement and consideration of the comments in this letter.

1. All outflows need to be covered by any permit, leaving no loopholes or unpermitted discharges. There should be no exceptions, nothing grandfathered. Large parts of Norwalk along the water are not covered by City Sewer, as shown in Norwalk's presentation, but two other towns are served. What a permit can do is require that the top priority be to avoid all pollution outflows, not expanding areas covered during dry weather when the plant cannot be expanded. Language covering all outflows aligns interests and language requiring actual measures, not averages, will force management to think about future storms, high tides, plan for future problems.
2. All outflows should have clear and independent monitoring required, real time data that is available to the public, improving education and understanding, making management easier for Norwalk and enforcement easier for DEEP. Technology today makes monitoring, reporting and building educational tools for

any age easy, so why not require it? Necessity is the mother of invention and it has been said that if someone can't explain something to an 8-year-old, they don't understand it. Norwalk is beginning to embrace using technology with Covid, so requiring it in this permit will be welcome, a win, win for the public good.

3. Enforcement for ignoring permit and monitoring conditions needs to be effective, hard enough, swift enough and expensive enough to deter cheating/lying/politics Cutting corners has always worked, which is why the conditions in the permit need to be clear and the penalties, including how enforcement will work, need to be up-front and punitive.

I implore DEEP to consider the unique issues and challenges that now face the City of Norwalk, including how Covid has affected budgets, communications and normal procedures. This is not an issue the average resident understands today, but this is something you can change with required public education/information/access to monitoring reports/incentives for finding unpermitted outflows. Norwalk is one of only 12 cities in CT and this permit directly affects the common good in all waterfront towns around Norwalk and along the river. Give Norwalk the game plan and they will rise to the occasion. The new CFO, one of the few Department Heads that will speak and meet with residents, believes in building technological solutions and educating the public about issues and tradeoffs in City Government. Also, the City of Norwalk is full of small tech companies looking for problems to solve.

Save the Sound understands the issues and clearly outlined them in their November 7, 2020 letter. Diane Lauricella, environmental professional and on the City Water Quality Committee for the City of Norwalk, has explained the issues to lay people when the horrible smells arrive, but she cannot make them disappear. Diane understands the issues and tradeoffs, but her suggestions and solutions, always environmental and smart, are often ignored. The key is getting people to do the right thing for the common good, something a permit can do.

A clear, detailed, specific permit, where there is no room for confusion, no interpretation necessary, and enforcement penalties are included, is in everyone's best interest and desperately needed.

Thank you for raising the standards and know that, when do, you are also raising education and awareness, aligning interests for the common good. Do not hesitate to call me with any questions or comments.

Respectfully,

Lynnelle Jones

CT DEEP RESPONSE:

It was stated: "If an area is not covered by City Sewer, like my neighborhood, then reported outflows of pollutants are just ignored." If a sewage bypass is from a septic system, local health must be notified and the homeowner is responsible for the cleanup. The same is true if a homeowner's lateral from their house to the curb has a blockage or break not caused by the city owned sewer. Not all sewage cleanup is the responsibility of the city or falls under DEEP's jurisdiction.

Permits cover all sewer overflows, bypasses, and spills that come from the municipality's wastewater collection and treatment system. If you are referring to the Ann Street siphon as an unpermitted discharge, DEEP does not "allow" discharges from this outfall and is requiring the City to show why DEEP should permit it in the future in the Combined Sewer Overflow Long-Term Control Plan or "Master Plan" that will require review of the existing 002-1, Ann Street Siphon and approved I/I plan from 2018.

All permitted outfalls currently have flow meters. The NPDES permit requires meter, sampling, reporting and includes penalties for falsifying records under the Regulations of Connecticut State Agencies Section 22a-438. Penalties may be collected in administrative orders but DEEP generally prefers to require that the money be put into fixing the issue rather than going into the CT General Fund.

The NPDES permit does not require public information or education other than for CSOs. Monitoring report and enforcement information can be viewed on EPA ECHO at: <https://echo.epa.gov/facilities/facility-search>. DEEP cannot offer incentives for finding unpermitted outflows.

Received: Thu 1/21/2021 3:52 PM

From Sarah Crosby of Norwalk:

Dear Ms. Straut,

My name is Sarah Crosby and I am the director of Harbor Watch, a non-profit water quality research and education program that has been studying Norwalk Harbor since 1986. I am writing this letter as a written comment as was allowed in regards to the Public Hearing for the City of Norwalk NPDES permit on January 14, 2021. As was made clear at the hearing by Mr. Kolb and others, the City of Norwalk (and in particular the Water Pollution Control Authority) has made great strides to improve water quality outcomes of their operations and has plans for significant additional improvements in the months and years to come. Since the City's presentation did an excellent job of describing their plans, I won't details those here.

What I do want to share is the substance of our partnership with the Norwalk WPCA, a partnership which dates back many years but has never been stronger. Harbor Watch works with over a dozen towns in Fairfield County on water quality issues. While we have great working relationships with many of them, Norwalk's commitment to our partnership and clean water is among the very best. Our program conducts monitoring of local rivers and streams, storm water outfalls, and the Harbor. If we observe poor water quality conditions in the field or suspect an illicit discharge, a phone call or email from our team to Mr. Kolb prompts an immediate response to assess the situation. The WPCA is admirably transparent, collaborative, and responsive, always happy to share any maps or information that we need for our monitoring a track-down work or meet us in the field to assess a particular site of concern. We regularly share our data with the WPCA, and likewise they regularly provide updates to us so that we can best target our work to find any potential problem areas. I would be hard pressed to provide a better example of a municipal employee working harder to improve local water quality than Ralph Kolb. We look forward to our continued work with the WPCA to improve water quality in Norwalk's waterways, and we commit to assisting them however we can.

Sincerely,

Dr. Sarah C. Crosby Director of Harbor Watch

CT DEEP RESPONSE: No response required.

RECEIVED: Fri 1/22/2021 5:18pm
From Diane Lauricella or Norwalk:

Attorney Deshaie
CTDEEP Adjudications

Re: Norwalk NPDES Permit Renewal

Please place the following comments on the record for this proceeding. I understand that much of my initial testimony was not clearly heard due to digital connection problems.

My comments:

I am writing to you as a past founding President of the Norwalk River Watershed Association (NRWA), and an environmental professional. I am also a current member of the Norwalk Water Quality Committee, and committee of the City's Harbor Management Commission, but I am not speaking on their behalf.

I first wanted to thank Ann Straut for explaining, with detail, the permitting process. It is important for the public to understand how their infrastructure operates. Often, they take it for granted even though their taxes pay for it.

I also wanted to clarify for your knowledge something that Ann Straut stated about the Norwalk Water Pollution Control system. Ms. Straut mentioned that she thought all of Norwalk's wastewater and stormwater systems are combined. This is not the case, as the majority of Norwalk's stormwater pipes have been physically separated from its sewer pipes as the government mandated over time. Because of the age of the City and its developed land, there are still a small portion of CSO systems (Combined Sewer) in place, especially in the old urban centers.

I agree with all of the solutions that Save the Sound (STS) has suggested for a modified Norwalk Permit. Please include each of their suggestions in your final deliberation.

I want to be on record thanking STS for providing a second opinion about these technical issues, but do want to make sure that their assessment of the City's violations as laid out in their "Report Card" measures "apples to apples" and uses recent data.

Norwalk has indeed spent time and treasure on improving its water pollution control system and is to be commended for its progress.

However, there are still several problems that should be corrected during this round of permit renewal and the best way to do that is by changing the conditions of their permit and seeking accountability for past violations.

I want to highlight the alleged recent "discovery" of the manhole at Wall Street: This issue has been known by the City for at least 10-20 years. I hate to think that the horrible odors that were sensed at Wall Street were an indication of decades of sewer leakage into the north end of the Norwalk Harbor. In the 35 years I have lived in Norwalk, I have seen a turnover of Public Works Directors in addition to the usual local government election cycle every two years. I have great hope that our new WPCA Operator Suez and our new Public Works/Operations Director Anthony Carr will be able to finally end this violation.

Please also consider referring the Norwalk WPCA Sludge Holding Building, not a direct subject of this NPDES Permit, to the CTDEEP Air Quality Unit as horrible odors emanate from this building every time the garage door is opened so that the sludge can be removed and taken to an off-site sludge processing incinerator. While I think that there are also OSHA violations created for the workers who have to enter this building, I know that its continued allowed air quality violations creates not only a nuisance for the neighborhood, but interferes with the City's Economic Development potential.

Lastly, I would like the CTDEEP to ask the City to monitor for the following parameters at its permitted outfalls:

1. Pharmaceuticals
2. Micro-plastics
3. Parameters that STS has requested.

Thank you for the opportunity to comment in writing.

Diane Lauricella

CT DEEP RESPONSE: DEEP considers any sewer collection system that is tainted with one combined sewer to be considered a combined sewer system. So even if only a few blocks remain to be separated into two distinct systems (storm and sewer) the entire system is labeled a combined sewer system.

DEEP cannot speak to previous sewer inspections and whether the Wall Street CSO was previously known or not. It has been found now and is being monitored for permanent closure.

You are correct that the NPDES permit does not address odors or odor control at the treatment site. If the odors are an ongoing issue, DEEP recommends contacting the Air Bureau at (860)

424-3436 or deep.aircomplaints@ct.gov to file a complaint. DEEP will be sure to take the wet sludge holding building odor issues into consideration when the wastewater treatment plant undergoes facility planning for the future.

DEEP will not be adding pharmaceuticals or microplastics monitoring into the permit at this time. There are no EPA accepted testing methodologies or minimum quantitative limits to test to at this time, and DEEP has not developed any of their own. This would make testing meaningless and possibly cost prohibitive. When a testing methodology and minimum quantitative level is established, DEEP will likely adopt those standards and require the testing at all NPDES permitted wastewater treatment plants. Parameters discussed by Save the Sound already are required in the permit.

RECEIVED: Fri 1/22/2021 6:27 PM

From John Pinto of Norwalk:

Dear Ms. Straut: On behalf of the Norwalk Harbor Management Commission (NHMC), Norwalk Shellfish Commission (NSC), and Mayor's Water Quality Committee, we are herewith submitting comments to be considered in the Public Informational Hearing process concerning the above-referenced application to the Connecticut Department of Energy and Environmental Protection (DEEP) by the City of Norwalk (the City). As described during the January 14, 2021 Public Informational Hearing and the previously issued DEEP Public Notice, the City has requested renewal of a National Pollution Discharge Elimination System (NPDES) Permit from DEEP authorizing the discharge of up to an annual average daily design flow of 18.0 million gallons per day of secondary treated municipal wastewater to the Norwalk River from the City's wastewater treatment plant at 60 South Smith Street. The Public Informational Hearing was attended by representatives of the NHMC, NSC, and Water Quality Committee. During that Hearing, representatives of the City testified that the wastewater treatment plant is operating in compliance with all conditions and requirements set forth in the current NPDES Permit. The City's application for permit renewal was previously discussed during the October 1, 2020 meetings of the Water Quality Committee and the NSC. These meetings were attended by the representatives of the NHMC which also held its own meeting to discuss the permit renewal. At CITY OF NORWALK Norwalk Harbor Management Commission 125 East Avenue Norwalk, CT 06851 2 that time it was agreed by all committee and commission attendees to request additional information from DEEP and the City concerning the application. Our request for additional information was included in our letter to you of October 5, 2020. Specifically, the commissions and committee are aware of plans and proposals that would increase multi-family

residential density on and near the harbor. We therefore requested that the City, as part of the 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. City representatives responded to our letter with email correspondence attesting to the adequate capacity of the wastewater treatment plant to accommodate the planned and anticipated growth in the foreseeable future. This response was stated verbally during the January 14 Public Informational Hearing. On behalf of the NHMC, NSC, and Water Quality Committee we herewith request that a formal response to our informational request regarding the capacity of the wastewater treatment plant be included in DEEP's post-hearing "response to comments document." In addition, we wish to reiterate the significant authorities and interests of the NHMC, NSC, and Water Quality Committee in matters concerning the protection and improvement of water quality in Norwalk Harbor. We all recognize that bacteria and other water pollutants can affect the vitality of fish and wildlife, the enjoyment of water-dependent recreational activities, the health of those who come in contact with the water, and the overall quality of life. In this regard, water quality in Norwalk Harbor, Long Island Sound, and the Long Island Sound watershed is a principal determinant of the quality of Norwalk's exceptional shellfish resources providing uncommonly high economic and recreational value. The Norwalk Harbor Management Plan, approved by the State of Connecticut and adopted by the City contains a number of provisions to protect and improve water quality through reduction of both point and nonpoint sources of pollution. Among other things, the Plan 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. Pursuant to Sec. 22a-113n of the General Statutes, a recommendation of the NHMC pursuant to the Harbor Management Plan and supported by the policies of the Plan is binding on any official of the state when making regulatory decisions or undertaking or sponsoring development affecting the Norwalk Harbor Management Area, unless such official shows cause why a different action should be taken. Thank you for your attention to our comments. Please be advised that the NHMC, NSC, and Water Quality Committee reserve their rights to continue to review the application and provide additional comments and recommendations at such time as it may be modified, additional information is provided, or the application is the subject of any additional Public Notices or Hearings. 3 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

Pete Johnson, Norwalk Shellfish Commission

Joe Schnierlein, Chair, Mayor's Water Quality Committee

CT DEEP RESPONSE: DEEP defers to the Norwalk WPCA to answer the questions regarding capacity and ability to handle future loads as the city allows more structures.
