



**CITY OF DANBURY**  
**DEPARTMENT OF PUBLIC UTILITIES**  
**155 DEER HILL AVENUE**  
**DANBURY, CT 06810**

**(203) 797-4637**  
**FAX (203) 796-1590**

January 11, 2013

Betsey Wingfield  
Bureau Chief  
Water Protection and Land Reuse  
Department of Energy and Environmental Protection  
79 Elm Street  
Hartford, CT 06106

Re: Public Act 12-155, An Act Concerning Phosphorus Reduction in State Waters  
City of Danbury Comments

Dear Ms. Wingfield:

Danbury attended both of the recent public meetings regarding Public Act 12-155. We offer the following comments for consideration by DEEP:

Danbury strongly supports the "Comments of Connecticut Municipal Nutrient Group Regarding Stakeholder Process Under Public Act 12-155" and the "Proposed Framework for Collaboration" as submitted by our attorney Fred Andes of Barnes & Thornburg.

Danbury's position on the issue of "long term" phosphorus reduction limits is as was stated in our April 16, 2012 letter to CT DEEP regarding the recent Nutrient Reduction Facilities Plan prepared for the City of Danbury. As DEEP is aware, the Danbury WWTP currently removes approximately 90% of all influent total phosphorus. We will continue to optimize our efforts to lower total phosphorus through the use of multiple point chemical addition. However, in order to meet DEEP stated long term phosphorus removal limits of 0.1 mg/l (to achieve 98% removal) extensive capital improvements would be necessary at the Danbury WWTP. As identified in the 2011 Nutrient Reduction Facilities Plan the cost of the capital improvements to ensure total phosphorus removal of 0.1 mg/l (for an additional 8% removal) is estimated at 25 to 30 million dollars.


Based on continued review of the subject of phosphorus removal by multiple scientific consultants we still remain extremely concerned that the reduction of phosphorus loads to stated DEEP limits of 0.1 mg/l has not yet been shown to result in a significant improvement in water quality or attainment of designated uses in Limekiln Brook, the Still River, or downstream waters. Prior to spending any significant capital funds on meeting DEEP stated "long term" stringent nutrient removal limits (for an additional 8% phosphorus removal), we must be able to clearly show the public that the work to be done is essential to the environment and is not just being done because it could possibly make a difference. It is very difficult to expect sewer users to financially support a project when we cannot defend its scientific need. Based on current

information, it would be difficult for anyone, be it the City, DEEP or someone else, to explain to sewer users how an additional 8% phosphorus removal, at a cost of 25 to 30 million dollars, will result in a significant beneficial change in the downstream environment.

It is essential that the collaborative process, under Public Act 12-155, be properly performed so that all parties involved truly understand and agree on the fundamental approach and scientific methodology used so that proper limits can be set and so that the environmental importance of meeting these limits can be fully understood and supported by the community, and particularly by the sewer users that will have to pay for it.

We continue to be vigilant stewards of our environment and area waterways and will operate our existing WWTP facilities to optimize the quality of discharge effluent. We look forward to actively participating in this collaborative process and appreciate the opportunity to be heard on this very important matter.

Sincerely,

A handwritten signature in blue ink, appearing to read 'David M. Day', with a large, stylized flourish extending to the right.

David M. Day, P.E.  
Superintendent

C: Mark D. Boughton, Mayor  
Antonio Iadarola, P.E., Director of Public Works  
Daniel E. Casagrande, Esq., Cramer & Anderson