



CONNECTICUT ASSOCIATION OF WATER POLLUTION CONTROL AUTHORITIES

January 11, 2013

Deputy Commissioner Mackey McCleary
Bureau Chief Betsey Wingfield

DEEP.phosphorus@ct.gov

RE: Comments – Public Act 12-155, Statewide Phosphorus Reduction Strategy

The Connecticut Association of Water Pollution Control Authorities is a statewide association open to WPCAs and public entities authorized to own or operate wastewater systems. With over 40 active members providing wastewater services to nearly 1,000,000 citizens in the state we are pleased to submit comments on Public Act 12-155. Public Act 12-155, requires the Department of Energy and Environmental Protection and representatives of Cheshire, Danbury, Meriden, Southington, Wallingford, Waterbury and any other impacted municipality, to collaboratively evaluate and make recommendations regarding a state-wide strategy to reduce phosphorus loading in inland non-tidal waters.

We believe that a collaborative process as required in Public Act 12-155 is paramount to achieving the phosphorus reduction goals on a statewide basis and that the strategy will address the following concerns of our members:

1. Nonpoint Source Pollution: DEEP has acknowledged that non-point source discharges contribute to the phosphorus loading in Connecticut rivers and streams. We are concerned that the majority of the burden for phosphorus reduction is being placed on the shoulders of the NPDES permit holders and our users. We believe that an all in approach addressing all discharges on an equal basis would be most productive; this will bring all stakeholders to the table.
2. Science –Based Approach/Alternatives: Develop and explore alternative science based approaches for measuring current phosphorus levels and making future projections of phosphorus levels. The expected improvements in water quality should be clearly defined and determinations made as to whether the proposed reduction strategy will achieve the desired water quality in the most cost-effective way. This will ensure that any monies spent to achieve the phosphorus reduction strategy are monies well spent and the desired water quality can be achieved.
3. Compliance: We are deeply concerned about the proposed compliance schedule and proposed “interim limits” whereby DEEP may impose stricter limits in subsequent permit cycles. Communities need assurance that they are not chasing a moving target that has the potential of placing undue burdens on communities to spend millions of taxpayer dollars in additional plant upgrades every permit cycle just to remain in compliance. Compliance

schedules should be such that they allow communities sufficient time to study, plan and finance the required plant upgrades.

Thank you for the opportunity to comment. We appreciate DEEP's willingness to engage in a productive dialogue about these issues.

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