

SUBJECT	PUBLIC COMMENTS: 12/6/12 POINT SOURCE PHOSPHORUS MEETING
Process	<ul style="list-style-type: none"> • Process should be collaborative, modeled after approach used for stream flow process • Process should be overseen by a neutral third party and should be agreed upon in an organizational meeting • Informative discussions and regular stakeholder meetings • Stakeholders define problems that need to be addressed, and focus on measures that will address designated use impairments • Consider cost to parties to implement controls • Impact to ratepayers and other costs to municipalities • Use best available science, potential for large expenditures with little environmental benefit • Other states have methods/options that should be discussed • Timeline for compliance in process rather than enforcement • Time needed to conduct studies to justify methods required • Collaborative process will help obtaining public support to justify expenditures. • Relative cost per pound increases are not linear and proportional, as costlier technology is required. The difference in cost between meeting a limit of 0.1 and 0.2 mg/l is great. • Nonpoint source controls may be more justifiable than documentation provided indicates. Continued holistic approach is desired. • City of Waterbury engagement in process is requested. • A quick resolution is desirable considering the adverse ecological impacts which are present
Phosphorus Impacts	<ul style="list-style-type: none"> • Observations that the Naugatuck River is eutrophied, excess algae, wildlife flight away from river. Too many nutrients are present in surface waters with potential for worsening problem. • Impacts on surface waters and aquifers are being observed. • University of New Haven observations that P and N work together and that P loading will stimulate algal growth and problems associated in Long Island Sound.

<p>Defining Phosphorus Criteria and Limits</p>	<ul style="list-style-type: none"> • Phosphorus is not a toxic pollutant, EPA criteria are not specific to CT and criteria may not be realistic for CT, and overly stringent • EPA criteria cutoff and State model both are flawed, other options exist, Determine right amount of P for a water body to support desired ecological community. Benthic diatoms are a component, other indicators and factors are critical: shading for example • More data and analysis of associated factors will ensure that reductions imposed will achieve benefits to biological community • Other factors in urban agricultural and flow modified stream have impacts that affect benthic communities, lack of shading may cause very different impacts in P loaded streams. • MA point source approach, as we crank down on limits, costs rise faster than benefits. Direct benefits to biological communities need to be documented with data • Are tidal freshwater waterbodies addressed at this time?
<p>Lakes</p>	<ul style="list-style-type: none"> • Would like to modify MS4 requirements to include lake-centered population areas with concentrated populations, independent of municipal boundaries. • How do private lakes with no public access fit into the process? • Corrosion control orthophosphate in water systems and its effects on lakes should be addressed. 1-2 mg per liter added • Potential algal toxicity and human health impacts add incentives. • Funds needed to address problems specific to lake watersheds. • Fishability may not be an appropriate goal, since eutrophication can increase fish productivity of lakes.
<p>Alternative Technologies and Applications</p>	<ul style="list-style-type: none"> • Has spray irrigation been considered as a beneficial use for effluent

11/29 Public Comment
Point Source P 12/6/12

Quick Resolution

Observations Naugatuck Eutrophied

High Q water being lost Aquifers + Surface W

P + N work together - Consider Pin LIS

Rivers Alliance will participate in forums

Relative cost per LB point vs NPS Removal

Significant changes in costs as technology changes - non-linear
incremental costs - continue to address 'holistically'

Δ between .1 and .2 load costly continue...

address this within collaborative process

How does DEEP view spray irrigation as a strategy?

example Golf Courses - Mashantucket etc. UConn Cogen
Co. Waterbury engagement in process requested + Ass/Fac.

P/Science/WWTP Pres (comments) 12-6-12

- On behalf of certain muni's

- Process - collaborative → follow streamflow model

→ 3rd Party Neutral

→ Agt. on Process

→ Stakeholder define problem(s) to be addressed

→ Cost to parties to implement controls

→ Impact on ratepayers / other muni costs

→ Best Avail. Science

→ Environ. results/improvements

→ Timeline for compliance in process rather than enforcement

→ Options for doing studies

→ Obtaining public support for building facilities, etc. projects, etc.

- Science / Monitoring

EPA criteria/observ. not entirely specific to CT / EPA req's may not be realistic for CT

Determining "right" amt of P @ particular location

→ Ecological Community
Situation Specific / for different diatoms, etc.

→ certain factors do not come out in State monitoring ~~approach~~ approach - need more data + look @ asst'd factors

→ esp w/r to nps such as agric. + urban - what need to do to achieve desired results?

- MA point source approach

→ cranking ↓ costs ↑ ... improvements? in-stream?

- Lakes

- Would like to modif. of MS4 piece that inc. lake-based pop. areas w/ conc. pop.

- private ~~lake~~ lakes w/ no public access - How do they fit into scenario

- corrosion control → + affect on lakes

- algae toxicity + human health risks - added incentives

Lakes (cont.)

- \$ to clean up nps in lake watersheds?

- "fishability" - may not be appropriate for lakes b/c of differ fish pops./sp. in differ. habitats/conditions

- Tidal vs. Freshwater ~~water~~ nps?

Consideration of Tidal water impacts?