



The Metropolitan District

water supply • environmental services • geographic information

April 5, 2019

Traci Iott
Supervising Environmental Analyst
Water Quality Program
Connecticut Department of Energy and Environmental Protection
79 Elm Street
Hartford, CT 06106

Comments submitted via email to: DEEP.WQS@ct.gov

RE: MDC Comments on 2019 Water Quality Standards Triennial Review

Dear Ms. Iott:

The District understands that Connecticut Department of Energy and Environmental Protection (CT DEEP) is initiating a review of Connecticut Water Quality Standards (WQS) to evaluate the need to update or revise the WQS. The District further understands that CT DEEP is requesting input from all interested parties on any aspect of the WQS that a person believes the Department should consider for potential revision. While few details have been provided to date by CT DEEP on specific potential changes, the District offers the following comments at this point in the WQS review process, and reserves the right to provide additional comments at a later point, based upon specific details regarding WQS changes proposed by CT DEEP.

Updates to Numeric Water Quality Criteria

The District requests that CT DEEP specify the WQS considered for modification with justifications on why the changes are being proposed.

Revise the Low Flow Statistic Applicable to Fresh Waters

The District requests any scientific information CT DEEP has developed or gathered that may be used as a basis for the change in low flow statistics. If the Q99 flow is considered, “roughly equivalent to the 7Q10” flow, the District would like to better understand why the proposed change is being made and what the specific impacts are to regulated entities that use the 7Q10 flow condition as part of their planning and operations.

Extended Disinfection Period

The District requests that CT DEEP provide the detailed information regarding the proposed extension to the current disinfection season. A reference was made during the March 13, 2019 public presentation that the proposed changes are being developed, "In response to previous public comments". The District requests a copy of these public comments. Additionally the District requests any scientific information CT DEEP has developed or gathered that may be used as basis for the disinfection season extension. The District requests that the financial burden placed upon all facilities be considered in the final decision making process. The District estimates that the proposed two month extension of the disinfection season will impact the water pollution control operating budget in excess of \$200,000 or nearly 1.5% increase, as well as increase maintenance and long-term capital costs. The District is strongly opposed to implementing year-round disinfection at any of its WPCFs as there is no scientific driver to do so.

Define Highest Attainable Use

The District requests that CT DEEP provide a draft of any proposed changes to the "Highest Attainable Use" standard for review and comment before any final changes are made.

Downstream Protection

The District requests additional information regarding specific changes proposed under this category to evaluate potential impacts.

Water Quality Classification Maps

The District requests additional information regarding specific changes proposed under this category to evaluate potential impacts.

Please contact me at (860)278-7850 ext. 3511, or via email at ttyler@themdc.com, if you have any questions.

Very truly yours,

THE METROPOLITAN DISTRICT



Thomas A, Tyler, P.E.
Director of Facilities

cc: S. Jellison
R. Bartley Halloran
B. Fox
C. Stone
J. Mirtle
J. Randazzo
R. Baral
C. Levesque
J. Bowers
S. Negrelli
A. Cosentino
J. Waterbury
S. Pratt