

# STATE OF CONNECTICUT

## DEPARTMENT OF PUBLIC HEALTH

Deidre S. Gifford, MD, MPH  
Acting Commissioner



Ned Lamont  
Governor  
Susan Bysiewicz  
Lt. Governor

### Environmental Health & Drinking Water Branch

August 19, 2021

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

Re: Total Maximum Daily Load (TMDL) Related Draft Documents

Dear Mr. Stevens:

The Department's Environmental Health & Drinking Water Branch (EHDWB) has reviewed the three draft documents: Statewide Lake Nutrient TMDL Core Document, Bantam Lake TMDL, and Bantam Lake Watershed-based Plan, and viewed the power point presentations for the public informational meeting concerning the draft documents that are posted on your agency's website. Attached are EHDWB's comments on the draft documents, and the comments are broken down by the branch program that generated the comments.

The majority of the EHDWB comments concern decentralized sewage system (DSS) matters. The Department of Public Health (DPH) believes there are opportunities moving forward for improved cooperation and communication between our agencies on planning and implementation actions that will improve DSS management in CT that will better position both agencies to achieve our broader environmental and public health protection goals, which will help address non-point source pollution and provide improved drinking water source protection.

The most significant EHDWB concern is a category of DSSs, alternative treatment systems. The draft documents and presentation slides discuss regulatory tools that can be utilized to address nutrient loading, and one cited tool is the establishment of municipal regulations to enable/promote use of alternative treatment systems based on proximity to a water body, and it lists this action as a high priority in the 5-year implementation schedule with a 2022 start date.



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Currently, the Department of Energy and Environmental Protection (DEEP) is the permitting authority for alternative treatment systems. Due to lack of resources, DPH has been unable to develop regulations and an accompanying program for these systems to allow jurisdiction to transfer from DEEP to DPH as authorized by CGS Sec. 19a-35a. The Department doesn't support widespread use of alternative treatment systems without the benefit of support from a state level program that provides the management tools to ensure the systems are properly designed, installed, and maintained.

Please contact me if you would like to discuss the comments. Program staff are also available for further discussions moving forward.

Sincerely,

Lori Mathieu  
Public Health Branch Chief  
Environmental Health & Drinking Water Branch

C: Heather Aaron, MPH, LNHA, Deputy Commissioner, DPH  
Jim Vannoy, MPH, Chief, Environmental Health Section, DPH