



Woodridge Lake Sewer District

113 Brush Hill Road

PO Box 258

Goshen, CT 06756

August 17, 2021

Sarah Hurley
Environmental Analyst
Water Quality Group, Bureau of Water Protection & Land Reuse
CT Department of Energy and Environmental Protection
79 Elm Street
Hartford, CT 06106-5127

RE: Bantam Lake TMDL

Dear Sarah:

The Woodridge Lake Sewer District (WLSD) is hereby responding to your request for comments on the Statewide Lake Nutrient TMDL Core Document, the Bantam Lake TMDL, and the Bantam Lake Watershed Based Plan. Our Board, staff, and our independent Professional Engineering firm (the WLSD group) have reviewed the draft documents posted on the Connecticut Department of Energy and Environmental Protection website and last updated on August 2, 2021.

Several of our Board members have been very active in the Woodridge Lake Property Owners' Association (the WLPOA) which is serviced by the WLSD. For years, the WLPOA has had an active program to improve the lake's water chemistry to help address impacts to aquatic habitat for fish and other organisms from nutrients. Their assessment of the Statewide Lake Nutrient TMDL Core Document is that it is consistent with the documentation developed by the professional management consultants that the WLPOA has used over the years and contains the type of educational materials to inform the public of the need for this type of program and the methods that can be utilized to improve the lakes within the state.

The WLSD group reviewed the Bantam Lake TMDL Appendix 1 in detail and offers several comments. First, we suggest a correction to page 9, paragraph 4.1 Permitted Wastewater Point Sources. The sentence reading "As reported, the WPCF was receiving wastewater from 658 connections with capacity for an additional 110 connections (Woodridge Lake Sewer District, 2016)" should be revised to read as follows: "As of this report date, the WPCF is receiving

wastewater from 703 connections with capacity for an additional 164 connections or a total of 877 connections as reported in our Facilities Plan Summary Report dated May 9, 2016.” Second, the WLS D staff and our independent engineer have reviewed the data in “Table 2: Recent total phosphorus and total nitrogen loading from Woodridge Lake WPCF.” We found that for April through October, the loading calculations were less than 1% different from the figures represented in Table 2. We therefore agree that they represent a fair indication of the loading without any changes. Third, the WLS D staff and independent engineer have reviewed the data on page 32 in “Table 12: Proposed Effluent Loading from the Woodridge Lake WPCF from a proposed on-site new Membrane Bioreactor (MBR) System.” Based on our review of the MBR design technical data and our plant's flow data, we concluded that the proposed loading chart is correct.. Finally, on page 33, Table 13 has been reviewed and we find that it accurately summarizes the calculations we reviewed, and indicated that if an MBR system were built at the Woodridge Lake WPCF, that result would be a reduction of 91.5% of total phosphorus and a 66.1% reduction of total nitrogen loading currently being produced by our facility.

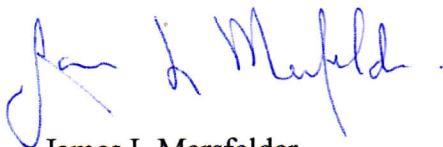
The Bantam Lake Watershed Based Plan, which was prepared for the United States Environmental Protection Agency, was reviewed by the WLS D group for consistency with the data, methods and conclusions presented in the Bantam Lake TMDL Appendix 1. We found it to accurately explain the impact of the Woodridge Lake WPCF on the Bantam Lake.

In conclusion, the WLS D's review finds that the referenced reports accurately represent the current nutrient TMDL on Bantam Lake. The reports also accurately conclude that an on-site new Membrane Bioreactor (MBR) System would substantially reduce the Woodridge Lake effluent total phosphorus and total nitrogen loads if approved by the DEEP for construction.

Our Board has another alternative solution that is outside of the scope of this study, which is the regionalization of the processing of our wastewater by the Litchfield WPCF. This regionalization project would eliminate the Woodridge Lake WPCF total phosphorus and total nitrogen loading from the Bantam Lake watershed. Our Board believes this option is the most environmentally responsible path to take given the circumstances and would encourage the Town of Litchfield and Morris as stewards of Bantam Lake as well as the interested local environmentalist groups and the public to actively support such an alternative.

Thank you for allowing us to review and comment on these documents in advance of their release. Please get in touch with me at jim.mersfelder@wlsd-goshen.org if you have any questions regarding our response.

Respectfully,



James L Mersfelder
Vice President & Treasurer for the Board

cc WLS D Board