



National Pollutant Discharge Elimination System & State General Permit for the Discharge of Swimming Pool Wastewater to Surface and Ground Waters of the State

Permit No. CTGPL0000

Response to Comments

The Department has evaluated the public comments received during the notice period. Below are the comments in italics followed by the Departments response and recommendation:

- 1. An acceptable range of metals (copper, zinc, silver) in potable water ought to be acceptable to put on ground seeing that any well with trace metals is used for watering gardens and lawns. Do you know the standard for potable water? Can we use the same standard in the permit?*

Response: Section 2.2.1.4 of the general permit prohibits the discharge of disinfectants which contain copper or silver for splash pads or similar facilities which have routine and frequent overflows onto the ground. Additionally, Section 4.5.1.4 prohibits the discharge of copper, zinc, and silver to surface water.

The Safe Drinking Water Act (SDWA) authorizes the United States Environmental Protection Agency (US EPA) and the CT Department of Public Health to develop health-based standards for drinking water to protect against both naturally occurring and man-made contaminants that may be found in drinking water and subsequently used to water gardens and lawns. The drinking water standards were developed to protect human health and were not developed to protect lawns, gardens, ground or surface water. The US EPA's drinking water standards are available online here for review: <https://www.epa.gov/ground-water-and-drinking-water/national-primary-drinking-water-regulations>.

The Clean Water Act (CWA) authorizes US EPA and CT DEEP to develop water quality standards for the protection of human health and aquatic life in surface waters of the State. CT DEEP is authorized by state statute and regulation to develop groundwater standards to protect human health and surface waters from pollution.

This general permit is a statewide permit, meaning it must have protective permit limits and conditions for all ground and surface waters of the State, hence DEEP has prohibited the discharge of swimming pool wastewaters containing copper, zinc, and silver. No change is recommended in the final permit.

- 2. It is noted that in Section 4.6.1.2, discharges of swimming pool wastewater draining from a pool that uses a chlorine generator to produce free chlorine, and thus has the potential for a higher sodium*

chloride content must be discharged to a Publicly Owned Treatment Works (POTW) or applied to the ground surface and must entirely infiltrate into the ground. The concentration of sodium chloride in pools is typically between 2,700-3,400 ppm (parts per million) and the Connecticut Department of Public Health provides guidance for sodium concentrations over 100 ppm and chloride levels over 250 ppm for drinking water. Should specific separation distances or other requirements be specified in the SPWGP for such discharges to groundwater to better protect drinking water?

Response: Please note that in the final permit, Section 4.6.1.2 has been renumbered to Section 4.5.1.2. The following language has been added to Section 4.3 Discharges to Ground Water via a Dedicated Subsurface Disposal System, “The entire discharge volume shall maintain a minimum distance of at least 25 feet from any drinking water supply well, subsurface sewage disposal system or surface water body.”

- 3. It is noted in Section 2.2, that “Discharges to Sanitary Sewer” are not covered by the SPWGP, but such discharges are covered by either the General Permit for Discharges from Miscellaneous Industrial Users or the General Permit for the Discharge of Wastewaters from Significant Industrial Users (Industrial General Permits). It is recommended that since the SPWGP requires permittees to discharge to available sanitary sewers, that a definition for sanitary sewer be added in Section 11 and that notes that such discharges to a sanitary sewer are permitted by one of the two Industrial General Permits.*

Response: A definition of “sanitary sewer” has not been included in the final permit, but clarifying language has been added throughout the permit to address the comment.

- 4. The use of defined terms in the body of the permit are not always consistent with what is listed in Section 11. For example, the definition of “person” in Section 11 excludes municipalities, but the definition of “person” in Section 2.2.1.1 and the paragraph below Section 4.1.5 includes municipalities.*

Response: Section 2.2.1.1 has been revised removing the term “person” in quotes and retained the term “permittee”. The term “permittee” is used to identify “any person, owner, operator, SP1 or SP2 licensed contractor, or municipality” throughout the general permit where appropriate.

- 5. Sections 3.1 and 9.14 note that coverage under the SPWGP is automatically granted without submitting a registration to the Commissioner; however, the use of the term “registrant” within the SPWGP and the definition in Section 11 might lead to confusion.*

Response: The term “registrant” has been revised where appropriate throughout the general permit to “permittee”.