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Subject: Water Quality Standards Revisions
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To who it may concern:

Revisions to the numerical water quality standards should include:

- The USEPA "Biotic Ligand" model for setting site specific criteria for copper in fresh water
- When adopted , the USEPA biotic ligand model for setting site specific criteria for copper in estuarine waters
- The 2018 USEPA criteria for aluminum in fresh water which includes adjustments for bio-availability based upon hardness and DOC in the water body

CTDEEP should also adopt the USEPA approach for establishing allocated zones of influence(ZOI) for human health (HH) based water quality criteria (USEPA TSD for Water Quality-Based Toxics Control, March 1991, pages 87 thru 89) in NPDES permits). A acceptable alternative to the USEPA approach is the method proposed in the CTDEEP " Technical Support Information for Proposed Revisions to the CT WQ Stds: Ambient Water Quality Criteria , January 28, 2010, Page 9. The approach that CTDEEP NPDES permit engineers are currently using , setting HH criteria permit limits using a "zero "ZOI", is not consistent with these methods , and is not justified technically or environmentally . Inclusion of the these methods for establishing ZOIs for HH criteria in NPDES permits would require amending narrative items 10, 11 and 12 in the Surface Water Quality Standards (pages 2 thru 4). Once adopted, all NPDES permits using the "ZERO " ZOI approach should be amended by CTDEEP.

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