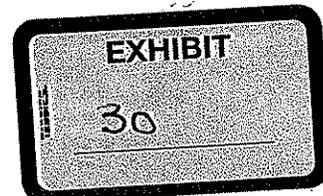


ROBERT FROMER
EJD, MSEE, P.C., P.E., R.E.P.

FEB 09 2010

January 28, 2010

Mr. Paul E. Stacey
Department of Environmental Protection
Bureau of Water Protection and Land Reuse
Planning & Standards Division
79 Elm Street
Hartford, Connecticut, 06106-5127



Re: Proposed Amendments to Connecticut's Water Quality Standards

Dear Mr. Stacey:

The Proposed Amendments to Connecticut's Water Quality Standards ("Amendments") represent a considerable improvement over the current water quality standards. Nonetheless, the Amendments only provide criteria and standards for receiving water bodies. Even though the Amendments identify stormwater runoff as a major source of pollution to surface waters, there are no criteria for the quality of surface runoff at the point of discharge from the collection system to a water body. See the Attachment for a list of the *Most Stringent Criteria for Stormwater Runoff*.

The Department of Environmental Protection ("DEP") has a *Stormwater Quality Manual*, which is a guide on Best Management Practices for pollution mitigation; however, it contains no objective criteria. For a remedy, DEP should establish such interim criteria for runoff pollution unless and until the agency establishes Total Maximum Daily Loads for specific chemical constituents in the different water bodies.

Cordially,


Robert Fromer
Environmental Consultant

Attachment: Most Stringent Criteria for Stormwater Runoff

STORMWATER RUNOFF CONCENTRATIONS AT THE POINT OF DISCHARGE	
Pollutant	Most Stringent Criteria
TSS	10,000 µg/l ⁽¹⁾ , for fish
BOD	5,000 µg/l ⁽¹⁾ , for swimming and bathing
COD	N/A
Oil & Grease	10,000 µg/l ⁽²⁾
Phosphorus	N/A
Nitrate	90,000 µg/l ⁽³⁾
Lead	8.5 µg/l ⁽³⁾⁽⁶⁾
Chromium	50 µg/l ⁽³⁾⁽⁶⁾
Copper	2.9 µg/l ⁽³⁾⁽⁶⁾
Nickel	8.3 µg/l ⁽⁴⁾⁽⁶⁾
Zinc	86 µg/l ⁽⁵⁾⁽⁶⁾

Notes: Where multiple criteria are available, the most stringent are listed.
N/A = Not available.

- (1) "Optimum and Maximum Values of Water Quality Characteristics in Relation to Type of Beneficial Use." The Water Encyclopedia, Lewis Publishers, 1980.
- (2) "Guides for Evaluating the Quality of Water for Aquatic Life. The Water Encyclopedia, Lewis Publishers, 1980.
- (3) Quality Criteria for Water (EPA Gold Book), United States Environmental Protection Agency, May 1986.
- (4) Ambient Aquatic Water Quality Criteria Document for Nickel, United States Environmental Protection Agency, September 1986.
- (5) Ambient Aquatic Water Quality Criteria Document for Zinc, United States Environmental Protection Agency, February 1987.
- (6) Most Stringent criteria calculated according to formulas stated in United States Environmental Protection Agency Gold Book.