

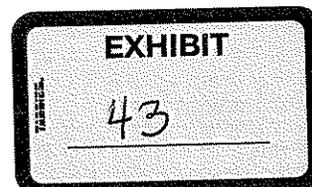
South Central Connecticut Regional Water Authority
90 Sargent Drive, New Haven, Connecticut 06511-5966 203-562-4020
<http://www.rwater.com>

BUREAU OF WATER PROTECTION AND LAND REUSE
PLANNING & STANDARDS DIVISION

March 11, 2010

MAR 15 2010

Ms. Traci Iott
Department of Environmental Protection
Bureau of Water Protection and Land Reuse
Planning & Standards Division
79 Elm Street, Hartford, Connecticut 06106-5127



Re: Proposed Revisions to Connecticut Water Quality Standards – December 22, 2009

Dear Ms. Iott:

The South Central Connecticut Regional Water Authority (RWA) is a non-profit public corporation and political subdivision of the State. Within the 20 member towns of our water district, we own and operate a public water system that includes 10 active reservoirs, 4 surface water treatment plants and 7 ground water treatment plants. We serve an estimated 430,000 water consumers an average of about 51 million gallons of water per day and provide fire protection throughout our service area. The source of this water is a system of watershed and aquifer areas that cover approximately 120 square miles in the south central Connecticut region. More than 27,000 acres of these watershed and aquifer areas are protected as open space as a result of the Authority's efforts and efforts with partners.

As stewards of public water supply watershed and aquifer areas used to provide public drinking water, we share common interests in ensuring that Connecticut's Water Quality Standards are an effective tool to guide the protection of these critical water resources. We have reviewed the proposed changes to the Connecticut Water Quality Standards and have the following comments:

1. The proposed new temperature criteria would limit the maximum daily temperature of waters containing reproducing populations of cold water fish (trout) to 74°F and 77°F for cool water fish. The 74°F limit would also apply to waterbodies stocked with trout during the months of April through June. The physical behavior of natural and artificial lakes with respect to water temperature dictates that these criteria will frequently be exceeded both within and downstream of water supply reservoirs, recreational lakes, and other lentic water bodies. The ability to control the temperature of water discharged to downstream areas is often very limited, especially when water is discharging over the spillway, the lake or reservoir is not thermally stratified, and/or there are no physical means to release water below the seasonal thermocline. We have concerns that dam owners, when seeking approvals from the DEP for activities such as dam maintenance, DEP 401 water quality certifications, diversions, and water treatment wastewater discharges, may be unduly penalized or held

accountable for a standard that is not practical or feasible, especially when the affected structures have been in existence for many decades. An unintended consequence might be that water utilities or other dam owners would choose to prohibit stocking of trout in their impoundments to avoid being held to this standard. We urge the DEP to revise the temperature criteria to appropriately recognize the natural and physical limitations to manipulate lakes and impoundments and their downstream areas with respect to water temperature.

2. Inputs of phosphorus from urban, suburban, and agricultural lands may be the single greatest water quality related threat to the ongoing viability of surface drinking water supplies. Algae blooms fueled by phosphorus inputs are a causative factor of numerous drinking water quality and operational issues including taste and odor, reduced filter runs, disinfection by-products, and anoxic conditions that can increase the concentration of undesirable contaminants such as manganese. While the current ability of the DEP to influence local land use regulations and decisions to effectively reduce or control nutrient loading from existing and new development is limited, we applaud and support the greater emphasis on nutrient loading contained in the revisions. We urge the DEP to place a high priority on working with municipalities and others toward meeting and maintaining the proposed nutrient criterion, especially in Class AA water bodies.
3. Surface water quality standard number 21 on page 6 states “Surface waters identified as potential drinking water supplies in the Long Range Plan for Management of Water Resources prepared and adopted pursuant to Section 22a-352 of the Connecticut General Statutes shall be designated Class AA.” This law requiring this Plan was passed in 1967 and the Plan has not been prepared to date. We recommend that this provision also apply to potential drinking water supplies identified in individual public Water Supply Plans submitted and approved pursuant to 25-32d of the Connecticut General Statutes.
4. Revisions to the Numerical Criteria for Chemical Constituents include the addition of criteria for aluminum. Water treatment wastewater discharges from drinking water utilities typically contain aluminum due to the use of alum for coagulation in the treatment process of reservoir water to remove particles that result from allochthonous and autochthonous sources. We request that the DEP work closely with the drinking water industry in Connecticut if it is anticipated that this change will in any way influence current effluent standards for aluminum in the General Permit for Water Treatment Wastewater or individual discharge permits held by water utilities.
5. Standard number 9 on page 2 has been modified to allow treated domestic sewage discharges to Class A surface waters under limited circumstances. Among the designated uses for Class A waters are potential drinking water supplies. It is our understanding from DEP presentations that this is targeting a small number of *existing* domestic waste discharges where subsurface disposal of domestic wastewater is not technically and economically feasible. However, the new language makes no distinction between existing and future discharges. In addition, Class A waters affected by such discharges would be precluded from future use as drinking water supplies in that sewage discharges to water bodies

RWA Comments – DEP Water Quality Standards

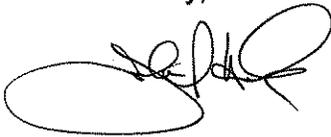
March 11, 2010

Page 3 of 3

used for drinking water are prohibited by statute (Section 22a-417 CGS), a point which is reinforced by the Water Quality Standards themselves (Standard 22). Although all of the SCCRWA identified inactive or potential sources of supply are currently classified as AA, we believe that this is an inconsistency that needs to be clarified.

Thank you for the opportunity to comment on these proposed revisions. If you have questions, please contact me at 203-401-2733 or jhudak@rwater.com.

Sincerely,



John P. Hudak

Environmental Planning Manager