

Hi:

I attended your presentation today and wanted to offer you a few thoughts on phosphorus control through MM3, IDDE, and MM4 and 5, construction activities.

The DEEP has indicated that ON-site systems are doing a good job of protecting water quality. Obviously, most new systems if designed, constructed and maintained well should do a good job of protecting water quality. However, in areas where waterbodies are Impaired, many of the on-site systems installed are likely to be systems that existed long before the current codes. Those codes did not recognize nutrient removal as a purpose to have on-site systems. Therefore, when considering the long term goals and places to put funding opportunities, it would seem appropriate to have funding for inventorying, management and upgrading failing or substandard systems. These activities are being accomplished through MM3, IDDE of MS4 permits in States like NY.

Successful programs to control phosphorus can be compared to a four legged stool. When any leg is short the stool can wobble and become unstable. In this case, the legs of the stool are the regulatory community, the Design community, the contractors and the owners. Current programs relating to phosphorus control such as Erosion and Sediment control and Stormwater quality have ignored the contractors who build and maintain control measures. The DEEP should consider implementing a program such as the one CTDPH has in place for training and licensing contractors who install on-site treatment systems. This program has been a great benefit to the success of that on-site treatment systems have had in protecting water quality.

Thanks for the opportunity to share a few thoughts.

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