

City Of Torrington



WATER POLLUTION CONTROL AUTHORITY
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January 10, 2013

Mr. Macky McCleary, Deputy Commissioner
CTDEEP
79 Elm St
Hartford, CT 06106

Dear Mr. McCleary

Thank you for the opportunity to submit comments on Public Act 12-155, which requires the Department of Energy and Environmental Protection and representatives of Cheshire, Danbury, Meriden, Southington, Wallingford, Waterbury and any other impacted municipality, to collaboratively evaluate and make recommendations regarding a state-wide strategy to reduce phosphorus loading in inland nontidal waters.

As with the other affected communities (*Danbury-\$30 million, Southington-\$18.5 million, Wallingford-\$19 million, Meriden-\$13.5 million, Cheshire-\$7.2 million*) the City of Torrington is poised to incur \$13.4 million in debt to implement the currently proposed phosphorus reduction strategy this is in addition to an estimated \$38 million for facility upgrades. In addition to the \$13.4 million debt service it is estimated that this would add an additional \$400,000 to the annual operating budget which would result in a rate increase of 38%.

As we continue to engage in productive discussions with DEEP relative to the renewal of our NPDES permit we believe that a collaborative approach is paramount to achieve the phosphorus reduction goals on a statewide basis. The City of Torrington welcomes the opportunity to work with the affected communities and DEEP to assist in the development of this strategy.

We are hopeful that the collaborative process as required in Public Act 12-155 will ensure that a statewide phosphorus reduction strategy will address the following concerns of the City of Torrington:

1. Nonpoint Source Pollution: DEEP has acknowledged that non-point source discharges contribute to the phosphorus loading in Connecticut rivers and streams. We are concerned that the majority of the burden for phosphorus reduction is being placed on the shoulders of the NPDES permit holders and our users. We believe that an all in approach addressing all discharges on an equal basis would be most productive; this will bring all stakeholders to the table.

2. Science –Based Approach/Alternatives: Develop and explore alternative science based approaches for measuring current phosphorus levels and making future projections of phosphorus levels. The expected improvements in water quality should be clearly defined and determinations made as to whether the proposed reduction strategy will achieve the desired water quality in the most cost-effective way. This will ensure that any monies spent to achieve the phosphorus reduction strategy are monies well spent and the desired water quality can be achieved.
3. Compliance: We are deeply concerned about the proposed compliance schedule and proposed “interim limits” whereby DEEP may impose stricter limits in subsequent permit cycles. Communities need assurance that they are not chasing a moving target that has the potential of placing undue burdens on communities to spend millions of taxpayer dollars in additional plant upgrades every permit cycle just to remain in compliance. Compliance schedules should be such that they allow communities sufficient time to study, plan and finance the required plant upgrades.

The City of Torrington supports the collaborative process as outlined and submitted by the Connecticut Municipal Nutrient Group and looks forward to being an active participant in this process. Thank you for the opportunity to provide comments on this very important issue.

Sincerely,



Raymond E. Drew
Administrator, WPCA