



Via Electronic Submission to: deep.wqsreview@ct.gov

December 16, 2013

Bureau of Water Protection and Land Reuse
Connecticut Department of Energy and Environmental Protection
79 Elm Street
Hartford, Connecticut 0616-5127

RE: Comments on Triennial Review of Connecticut Water Quality Standards

Dominion appreciates the opportunity to submit comments on the Connecticut Department of Energy and Environmental Protection's (DEEP) notice of the initiation of the triennial review of Connecticut's Water Quality Standards (WQS). Dominion is one of the nation's largest producers and transporters of energy, with a portfolio of approximately 23,500 megawatts of generation, 11,000 miles of natural gas transmission, gathering and storage pipeline and 6,400 miles of electric transmission lines. Dominion operates the nation's largest natural gas storage system with 947 billion cubic feet of storage capacity and serves retail energy customers in 15 states.

We hold National Pollutant Discharge Elimination System (NPDES) Individual and General Permits for discharges associated with our Millstone Power Station in Waterford, Connecticut and a General Permit for discharges associated with our Bridgeport Fuel Cell which is currently under development. Changes in Connecticut's water quality standards can directly affect our discharge permits associated with these facilities. We offer comments for consideration on the following topics identified by DEEP for possible revision.

Extended Compliance Timeframes with Water Quality Based Effluent Limitations (WQBELs)

We support inserting language into the WQS to allow extended compliance timeframes for WQBELs. The proposed revision will provide appropriate flexibility to allow reasonable compliance schedules for addressing the study, planning and cost sometimes associated with operational changes necessary to meet WQBELs. The proposed revisions will also provide consistency with the handling of compliance timeframes in the federal WQS. We recommend that the revised WQS language allow compliance timeframes to extend up to the length of the permit term. We have had situations in other states in which compliance schedules have been limited to arbitrary lengths. Compliance schedules should be based on a determination of the

appropriate time necessary to make the operational changes necessary to meet the WQBEL and should not be limited in the WQS to less than a permit term.

Evaluation of Change From the 7Q10 to Q99 Flow Statistic Should Consider Impacts to Existing NPDES Permits

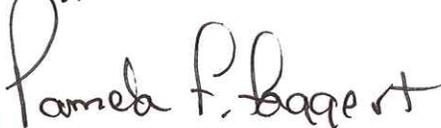
DEEP is considering changing the flow statistic used in the WQS from 7Q10 to Q99. The 7Q10 flow statistic has historically been used in the determination of permit limitations. While the 7Q10 and the Q99 may be similar in some circumstances, there are likely situations where they will be substantially different resulting in different permit limitation determinations. DEEP should conduct a thorough evaluation of the potential affect of the change in the flow statistic and make it available for public review prior to proposing revisions to the WQS.

Inclusion of “Inland Wetlands and Watercourses” In the Definition of Surface Waters in Unnecessary

The current definition of surface waters in the WQS is comprehensive and includes “the waters of Long Island Sound, its harbors, embayments, tidal wetlands and creeks; rivers and streams, brooks, waterways, lakes, ponds, marshes, swamps, bogs, federal jurisdictional wetlands, and other natural or artificial, public or private, vernal or intermittent bodies of water.” Both the terms “inland wetlands” and “inland watercourses” can fall within the current definition of surface waters. The addition of these terms is unnecessary and could be construed as expanding jurisdiction of the WQS. We suggest the definition of surface waters remain unchanged.

We appreciate the opportunity to provide comments for consideration during the water quality standards triennial review and respectfully request that these comments be considered. If you have any questions, please call me at 804-273-3467 or Jason Ericson at 804-273-3012 (jason.p.ericson@dom.com).

Sincerely,



Pamela F. Faggert