

# DATA TRACKING AND TECHNICAL FACT SHEET

Permittee: Town of Litchfield

## PERMIT, ADDRESS, AND FACILITY DATA

PERMIT #: CT0100803 APPLICATION #: 201101982 FACILITY ID. 074-001

<u>Mailing Address:</u> Street: PO Box 343 City: Litchfield ST:CT Zip:06759 Contact Name: Terrence Donoghue Phone No.: 860-567-7580	<u>Location Address:</u> Street: 29 Stoddard Road City: Bantam ST: CT Zip: 06750 Contact Name: Terrence Donoghue Phone No.: 860-567-7580 DMR Contact email address:WPCA@townoflitchfield.org
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## PERMIT INFORMATION

DURATION 5 YEAR  10 YEAR  30 YEAR

TYPE New  Reissuance  Modification

CATEGORIZATION POINT (X) NON-POINT ( ) GIS #

NPDES (X) PRETREAT ( ) GROUND WATER(UIC) ( ) GROUND WATER (OTHER) ( )

NPDES MAJOR(MA)

NPDES SIGNIFICANT MINOR or PRETREAT SIU (SI)

NPDES or PRETREATMENT MINOR (MI)

COMPLIANCE SCHEDULE YES  NO

POLLUTION PREVENTION  TREATMENT REQUIREMENT

WATER QUALITY REQUIREMENT  OTHER

## OWNERSHIP CODE

Private  Federal  State  Municipal (town only)  Other public

DEP STAFF ENGINEER Max Fan DATE DRAFTED: April 28<sup>th</sup>, 2016

## PERMIT FEES

Discharge Code	DSN Number	Annual Fee
111000c	001-1	\$1722.50

## FOR NPDES DISCHARGES

Drainage Basin Code: CT6705-12-01 Water Quality Classification Goal: AA Segment: Bantam River-01

## NATURE OF BUSINESS GENERATING DISCHARGE

*Municipal Sanitary Sewage Treatment*

## PROCESS AND TREATMENT DESCRIPTION (by DSN)

*Secondary Biological Treatment with seasonal UV Disinfection*

## RESOURCES USED TO DRAFT PERMIT

Federal Effluent Limitation Guideline 40CFR 133  Secondary Treatment Category

Performance Standards

- Federal Development Document
- Department File Information
- Connecticut Water Quality Standards
- Anti-degradation Policy
- Coastal Management Consistency Review Form
- Other - Explain

#### **BASIS FOR LIMITATIONS, STANDARDS OR CONDITIONS**

- Secondary Treatment (Section 22a-430-4(r) of the Regulations of Connecticut State Agencies)
- Case-by-Case Determination
- In order to meet in-stream water quality
- Anti-degradation policy

#### **GENERAL COMMENTS**

The Town of Litchfield (“Litchfield”) operates a municipal water pollution control facility (“the facility”) located at 29 Stoddard Road, Bantam, CT. The facility is designed to treat and discharge up to 0.8 million gallons a day of effluent into the Bantam River. The facility currently uses secondary treatment with denitrification and seasonal UV disinfection to treat effluent before being discharged. Pursuant to Conn. Gen. Stat. § 22a-430, the Department of Energy and Environmental Protection has issued the Town of Litchfield a permit for the discharge from this facility. The Town of Litchfield has submitted an application to renew its permit. The Department has made a tentative determination to approve the Town of Litchfield’s application and has prepared a draft permit consistent with that determination.

The most significant changes from the current permit are the inclusion of the revised bacteria monitoring requirements (e.g. coli), aluminum monitoring to be consistent with the most recent CT Water Quality Standards and iron monitoring to be consistent with EPA’s National Recommended Water Quality Criteria.

#### **SPECIFIC REQUIREMENTS OR REVISIONS**

The Department reviewed the application for consistency with Connecticut’s Water Quality Standards and determined that with the limits in the draft permit, including those discussed below, that the draft permit is consistent with maintenance and protection of water quality in accordance with the Tier I Anti-degradation Evaluation and Implementation Review provisions of such Standards.

The need for inclusion of water quality based discharge limitations in this permit was evaluated consistent with Connecticut Water Quality Standards and criteria, pursuant to 40 CFR 122.44(d). Discharge monitoring data was evaluated for consistency with the available aquatic life criteria (acute and chronic) and human health (fish consumption only) criteria, considering the zone of influence allocated to the facility where appropriate. In addition to this review, the statistical procedures outlined in the EPA Technical Support Document for Water Quality-based Toxics Control (EPA/505/2-90-001) were employed to calculate the need for such limits. Comparison of the attached monitoring data and its inherent variability with the calculated water quality based limits indicates a low statistical probability of exceeding such limits. Therefore, no water quality based limits were included in the permit at this time.

#### **Phosphorus Permitting Approach**

Phosphorus is a naturally occurring element that is essential to support plant growth. When present in excessive amounts, phosphorus can impair both aquatic life and recreational use of Connecticut’s water resources. Excess nutrient enrichment is a serious threat to water quality in Connecticut. Excessive loading of phosphorus to surface

waters as a result of discharges from wastewater treatment plants or non point sources such as runoff from urban and agricultural lands, can lead to algal blooms, including blooms of noxious blue green algae, reduction in water clarity, and in extreme cases depletion of oxygen, fish kills, and other impairments to aquatic life. Currently, 21 water body segments have been identified on Connecticut's List of Waters Not Meeting Water Quality Standards where nutrient enrichment is a contributing cause of the impairment.

The Connecticut Water Quality Standards (WQS) do not include numeric criteria for nutrients but rather incorporate narrative standards and criteria for nutrients. These narrative policy statements direct the Connecticut Department of Environmental Protection to impose discharge limitations or other reasonable controls on point and non point sources to support maintenance or attainment of designated uses. In the absence of numeric criteria for phosphorus, the Department has developed an interim nutrient management strategy for freshwater non-tidal streams based on the narrative policy statements in the WQS to meet the pressing need to issue NPDES permits and be protective of the environment. The strategy includes methods that focus on phosphorus because it is the primary limiting nutrient in freshwater systems. These methods were approved by the United States Environmental Protection (EPA) in their letter dated October 26, 2010 as an interim strategy to establish water quality based phosphorus limits in non-tidal freshwater for industrial and municipal water pollution control facilities (WPCFs) national pollutant discharge elimination system (NPDES) permits.

The method in the interim strategy uses best available science to identify phosphorus enrichment levels in waste receiving rivers and streams that adequately support aquatic life uses. The methodology focuses on algal communities as the key aquatic life nutrient response variable and phosphorus enrichment factors that represent significant changes in communities based on data collected statewide. Ongoing work is currently being conducted to refine the approach through additional data collection and by expanding the methodology to include non-waste receiving streams. It is expected that the ongoing work will lead to numeric nutrient criteria for all freshwater rivers and streams in the next WQS review cycle. The current approach provides for a major statewide advancement in the level of phosphorus control that is expected to meet all freshwater designated uses. The adaptive nature of Connecticut's strategy allows for revisions to permit limits in future permit cycles without delaying action that we know needs to be taken today.

The current approach follows a watershed based framework incorporating many of the elements from the U.S. EPA Watershed –Based National Pollutant Discharge Elimination System (NPDES) Permitting Technical Guidance (2007). Consistent with the 2007 Guidance, the approach “explicitly considers the impact of multiple pollutant sources and stressors, including nonpoint source contributions, when developing point source permits”. Expected current conditions are based on the probability of excess phosphorus export from land cover and municipal and industrial facilities in the upstream drainage basin. Connecticut's policy for phosphorus management is translated into a numeric expression through geo-spatial and statistical analyses that determines the maximum acceptable seasonal phosphorus mass load per unit area of watershed contributing flow to the point of assessment.

The goal of the interim strategy is to achieve or maintain an enrichment factor (EF) of 8.4 or below throughout a watershed. An EF is representative of the amount of anthropogenic phosphorus loading to river and streams. It is calculated by dividing the current total seasonal phosphorus load by a modeled total phosphorus load under complete forested conditions at a particular point along the river. An enrichment factor is representative of the amount of anthropogenic phosphorus loading to rivers and streams. The goal of an 8.4 enrichment factor represents a threshold at which a significant change is seen in the algal communities indicating highly enriched conditions and impacts to aquatic life uses.

The analysis was conducted using benthic algae collected in rivers and streams throughout CT under varying enrichment conditions. The approach targets the critical ‘growing’ season (April through October) when phosphorus is more likely to be taken up by sediment and biomass because of low flow and warmer conditions. During winter months aquatic plants are dormant and flows are higher providing constant flushing of phosphorus through aquatic systems with a less likely chance that it will settle out into the sediment. Limiting the phosphorus export from industrial and municipal facilities offers a targeted management strategy for achieving aquatic life designated uses within a waterbody. The export of some phosphorus from facilities and other land sources is considered normal use of the land recognizing that humans are part of the environment.

A seasonal load was established by the Department for each facility discharging to non-tidal waters based on the current degree of enrichment of the receiving water body at the point of discharge and the facilities contribution to

the total watershed enrichment at the point of discharge.

#### *Litchfield Permit Requirements*

A nutrient watershed analysis was conducted for the Bantam River watershed with the below facilities discharging phosphorus into the river. The facility discharging to the river is the Litchfield WPCF. The seasonal (April 1<sup>st</sup> through October 31<sup>st</sup>) nutrient loading from each facility discharging to the watershed was reduced to achieve an enrichment factor of 8.4 or lower throughout the river.

The current enrichment factor at the Town of Litchfield's WPCF discharge is 9.5. The final proposed seasonal load allocation for Litchfield is 9.97 lbs/day. This load equates to a proposed treatment performance level of 2.39 mg/L multiplied by the average seasonal flow of 0.5 MGD. This will result in a reduction in the current WPCF load of 23.72 %.

Federal regulations at 40 CFR 122.44(d) indicate that permit issuers are required to determine whether a given point source discharge causes, has the reasonable potential to cause, or contributes to an in-stream excursion above a narrative or numeric criteria within a State water quality standard after consideration of existing controls on point and non-point sources of pollution. If a discharge is found to cause an excursion of a numeric or narrative state water quality criterion, NPDES regulations implementing section 301(b)(1)(C) of the Clean Water Act provide that a permit must contain effluent limits as necessary to achieve state water quality standards. The limit in the permit and the strategy are consistent with the narrative policy statements in the CT WQS and are expected to result in the attainment and maintenance of all designated uses for the water body when the strategy is fully implemented. If the Department develops numeric criteria in the future, or it is found that the current limit under the strategy is not sufficient to achieve designated uses, the goal will be modified and the WPCF will be expected to meet the more stringent water quality goal.

Translating the average performance level of 9.97lbs/day into enforceable permit limits requires consideration of effluent variability and frequency of monitoring in order to comply with federal permitting regulations. The procedure used is as follows:

1. Consider the proposed treatment performance level (2.39 mg/L) to be equivalent to the Long Term Average (LTA)
2. Calculate the Maximum Daily Limit by multiplying the LTA by the 99th percentile LTA Multiplier appearing in Table 5-2 of the Technical Support Document (page 103 of EPA/505/2-90-001) corresponding to a CV of 0.6% to account for effluent variability:

Maximum Daily Limit:  $2.39 \text{ mg/L} * 3.11 = 7.43 \text{ mg/L}$

3. Calculate the Average Monthly Limit by multiplying the LTA by the 95th percentile LTA Multiplier appearing in Table 5-2 of the Technical Support Document corresponding to a CV of 0.6% to account for effluent variability and either n=4 samples/month or n=10 samples/month as appropriate for the facility to account for the precision of estimating the true monthly average based on an average for the days the effluent was sampled:

Average Monthly Limit=  $2.39 \text{ mg/l} * 1.55 = 3.70 \text{ mg/l}$

#### Summary of Limits for Litchfield:

**Average Daily Load = 9.97 lbs/day**

**Total Seasonal Load = (9.97 lbs/day \* 214 Days/Season) = 2,133.58 lbs/season**

**Maximum Daily Limit = 7.43 mg/L**

**Average Monthly Limit = 3.70 mg/L**

With respect to the foregoing summary of limits, it should be noted that compliance with the Maximum Daily Limit or the Average Monthly Limit during the time the seasonal load limit is calculated will not ensure compliance with the Total Seasonal Load limit. For example, if the Permittee discharged phosphorus at the maximum permitted by either the Maximum Daily Limit or the Average Monthly Limit throughout the time that the seasonal load is calculated, the Permittee would exceed the Total Seasonal Load limit. For this reason, the Permittee must monitor compliance with the Total Seasonal Load limit independent of its compliance with the Maximum Daily Limit and the

*Average Monthly Limit.*

***WATER QUALITY LIMIT CALCULATIONS***

*See attached*

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