

August 2, 2012

Chris Sullivan
CT Department of Energy and Environmental Protection
Bureau of Water Protection and Land Reuse
79 Elm Street
Hartford, CT 06106

Dear Chris:

Thank you for the opportunity to review the DRAFT *CT Statewide Bacteria TMDL* documents posted for public comment. I have the following list of comments and suggested edits to recommend to you:

- In section 1 (and a few other locations), there are additional segments mentioned as part of Appendix A. Can you clarify what this appendix will be and where the additional segments will come from?
- In section 2.2.1, will it be possible to include information detailing the progress/status of fixing and/or eliminating the CSOs in the listed communities?
- In section 3.3 an explanation of the tiers would be helpful. How are the three anti-degradation tiers different from each other and are the tiers subsets of tier 1? Please clarify the differences in water quality tiers.
- In section 4.2 the counts of segments should be checked for accuracy. It would also be useful to clarify how a segment can have multiple impairments based on different use goals.
- The percent reductions are not the WLAs and LAs as described in section 8.1.1. The reductions are information about how much work will likely be needed to achieve the TMDL targets (criteria). The WLAs and LAs are components of the TMDLs themselves, along with the Margin of Safety. The TMDLs are the water quality targets. Please clarify the relationships of these values.
- In section 8.1.2, I recommend clarifying again that the criteria are the TMDL targets for an impaired segment.
- In table 8-2 would it be possible to add units to the headings in the columns for the table? This will clarify which column is the TMDL and which is the load reduction percentage.
- In section 5.5, the monitoring section, there is no discussion of DEEP efforts with continued monitoring on impaired segments. An inclusion of text describing the acceptance of data from other water programs and organizations would be valuable information for end users of the TMDL documents.

There are minor typographical revisions that I suggested during the drafting process that should be incorporated into the final versions of the TMDL documents as well.

Thank you for your time and effort in completing these TMDLs in an effort to improve water quality for Connecticut.

Sincerely,

Steven Winnett
EPA NPS Program Coordinator - CT