



RHODE ISLAND  
DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

235 Promenade Street, Providence, RI 02908-5767

TDD 401-222-4462

October 11, 2012

BUREAU OF WATER PROTECTION AND LAND REUSE  
PLANNING & STANDARDS DIVISION

OCT 16 2012

Erik Bedan  
CT Department of Energy and Environmental Protection  
79 Elm Street  
Hartford, CT 06106

Dear Mr. Bedan:

Thank you for the opportunity to review the State of Connecticut Integrated Water Quality Report (September 19, 2012 draft). The Rhode Island Department of Environmental Management (RIDEM) Office of Water Resources reviewed the Integrated Report for assessment consistency among shared border waterbodies. The following are our comments:

#### River and Stream Assessments

- The Moosup River flows from Rhode Island into Connecticut and it is listed by both states as impaired for bacteria. Rhode Island completed its TMDL in September of 2011 as part of its Statewide Bacteria TMDL. Please refer to this document or contact RIDEM for the most recent data collected from the Moosup River for additional information.
- Greenfall River becomes the Ashaway River when it crosses from Connecticut into Rhode Island. Connecticut has not assessed this River for recreational uses, while RIDEM lists the River as impaired and completed its bacteria TMDL in September 2011. Please refer to this document or contact RIDEM for the most recent data collected from the Ashaway River for additional information.
- Connecticut lists the lower, shared segment of the freshwater Pawcatuck River as fully supporting for aquatic life uses, while Rhode Island lists this segment as impaired for aquatic life use due to iron, lead, and invasive aquatic plants (this cause does not require a TMDL). A review of data available after Rhode Island completed the 2012 Integrated Report assessments indicates that this segment is now meeting iron criteria however, dissolved lead is still violating chronic criteria. Rhode Island data indicate that due to low hardness at stations in this river segment, the chronic criteria for several metals in this area are very low (< 1 ppb). RIDEM has worked with the RI HEALTH lab to obtain low metal detection limits enabling accurate measurement and assessment of low level metal concentrations in the state's waters. Rhode Island can provide this data to Connecticut. Both states are preparing bacteria TMDLs for this segment.
- The Rhode Island and Connecticut assessments are consistent for the Shunock River and Quanduck Brook.



30% post-consumer fiber

#### Lake Assessments

- The Rhode Island and Connecticut assessments are consistent for Beach Pond and Killingly Pond, two freshwater ponds that are located partly in each state.

#### Estuary Assessments

- RIDEM supports Connecticut's decision to extend the boundary of the upper tidal Pawcatuck River segment (CT-E1\_001-SB) to the Route 1 crossing where the upstream freshwater segment ends. The expanded segment is now consistent with the adjacent Rhode Island segment and includes developed areas in Pawcatuck, Connecticut.
- The Rhode Island and Connecticut assessments are consistent for both tidal Pawcatuck River segments and adjacent sections of Little Narragansett Bay.
- For the 2014 assessment cycle, RIDEM will utilize water chemistry data collected by CTDEEP at sampling locations found to also be representative of the Rhode Island's tidal Pawcatuck waters.

If you have any comments or questions, please contact me at 222-4700 extension 7300 or via e-mail at [elizabeth.scott@dem.ri.gov](mailto:elizabeth.scott@dem.ri.gov).

In closing, I want to extend our appreciation to CT DEEP staff in coordinating monitoring efforts and sharing data collected in our shared waters in the lower Pawcatuck River basin. Management of this valuable shared resource is clearly benefited by these coordinated efforts. We look forward to continuing work with our CT DEEP counterparts in efforts to protect and restore these waters.

Sincerely,



Elizabeth Scott  
Deputy Chief  
Office of Water Resources

ES/HET

Cc Traci Iott

South Central Connecticut Regional Water Authority  
90 Sargent Drive, New Haven, Connecticut 06511-5966 203-562-4020  
<http://www.rwater.com>

October 23, 2012

Mr. Eric Bedan  
Department of Energy and Environmental Protection  
Bureau of Water Protection and Land Reuse  
Planning and Standards Division  
79 Elm Street  
Hartford, CT 06106-5127

Dear Mr. Bedan

RE: Draft 2012 State of Connecticut Draft Integrated Water Quality Report

The South Central Connecticut Regional Water Authority (SCCRWA) is a non-profit, public corporation and political subdivision of the State. Our mission is to provide our customers with high quality water at a reasonable cost while promoting the preservation of watershed land and aquifers. We provide approximately 48 million gallons of water per day to more than 400,000 consumers in our region. The source of this water is a system of watershed and aquifer areas that cover about 120 square miles within 24 municipalities. More than 27,000 acres of these watershed and aquifer areas are protected as open space as a result of the Authority's efforts and efforts with partners. Within the 20 member towns of our water district, we own and operate a public water system, which includes 10 active reservoirs, 4 surface water treatment plants and 6 ground water treatment plants.

We have reviewed the draft 2012 Connecticut Integrated Water Quality Report, which was prepared pursuant to Sections 305(b) and 303(b) of the federal Clean Water Act, and have the following comments:

- The Priority List for TMDL Development of Impaired Water Bodies includes river and stream segments within the watersheds of SCCRWA public water supply reservoirs, including the Farm River in East Haven and North Branford, Burrs Brook in North Branford, the Mill River in Hamden and Cheshire, Willow Brook in Hamden and Cheshire, Shepard Brook in Hamden, and the Wepawaug River in Orange and Woodbridge. We would appreciate being kept apprised of TMDL development activities concerning these watercourse segments and are ready to assist as needed.
- On page 27, the report uses but does not define the term "conventional treatment" in stating that "Unless there is evidence to the contrary, DEEP presumes that the drinking water use is fully supporting for Class AA drinking water reservoirs and Class AA tributaries with conventional treatment" and "The presumption of full support for the AA designation due to conventional treatment reflects the source to tap approach..." *Conventional treatment* is defined by Part 141 of the National Primary Drinking Water Regulations as "a series of processes including coagulation, flocculation, sedimentation, and filtration resulting in substantial particulate removal". A number of treatment plants in Connecticut are direct filtration plants, which have no sedimentation step but generally

2012 Draft CT Integrated Water Quality Report  
October 23, 2012  
Page 2 of 2

function very well in treating cleaner source waters to meet drinking water standards.  
The intended use of the term "conventional treatment" for the purpose of the assessment methodology should be clarified.

Thank you for the opportunity to comment. Please contact me if you have any questions (203-401-2733; [jhudak@rwater.com](mailto:jhudak@rwater.com)).

Sincerely,



John P. Hudak  
Environmental Planning Manager

cc. Tom Chaplik, SCCRWA

## Bedan, Erik

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**From:** Mozian, Alicia [AMOZIAN@westportct.gov]  
**Sent:** Thursday, September 27, 2012 4:39 PM  
**To:** Bedan, Erik  
**Subject:** Integrated Water Quality Report

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Dear Mr. Bedan,

I have two general comments regarding the report:

1. Would it be possible for it to include a section documenting the streams for which a watershed management plan has been prepared?
2. The chapters listing the individual watercourse segments refer to a map but I was not able to locate that in the document other than those maps showing the whole state and even then, at a scale that was impossible to read. Is it possible to have a link to GIS mapping of these stream segments so interested parties can know exactly where these impaired sections are located? This would also help with pollution detection and improvement efforts.

Otherwise, this is a good document. So much work went into it. I'm glad we are making progress in the right direction.

Sincerely,

Alicia Mozian  
Conservation Director  
Town of Westport

Alicia Mozian | Conservation  
Town of Westport | 110 Myrtle Ave, Westport CT 06880  
T: 203-341-1170 F: 203-341-1088  
[www.westportct.gov](http://www.westportct.gov)



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION I  
5 POST OFFICE SQUARE SUITE 100  
BOSTON, MASSACHUSETTS 02109-3912

October 29, 2012

Mr. Erik Bedan  
CT Department of Energy and Environmental Protection  
Bureau of Water Protection and Land Reuse  
Planning and Standards Division  
79 Elm Street  
Hartford, CT  
06106-5127

Re: Review of Draft 2012 State of Connecticut Integrated Water Quality Report

Dear Mr. Bedan,

EPA New England appreciates the opportunity to provide comments on the draft 2012 Integrated Water Quality Report. Comments are offered on section of the document related to CWA§305(b) and the CWA§303(d) sections of the report.

Comments regarding the Introduction of the draft report as they relate to CWA§305(b)

Two topics that are required by the Clean Water Act are Water Pollution Control Program and Nonpoint Source Program descriptions. What is in the draft is not suitable for meeting this requirement. If there are up-to-date reports on both programs already existing, the State could include them in the body of the report, or as appendices. Links that expect the reader to search through more than one document for information are not appropriate.

Specific comments and recommendations are as follows:

While there is some narrative about the Water Pollution Control and Nonpoint Source programs, there is little specific information concerning content, progress, or challenges.

Page 1: Water Pollution Control Programs, first paragraph: referencing a series of online documents has its benefits for saving narrative space, but actually providing some information and a discussion of specifics of activities in the CWA§305(b) report is needed. As it is this does not meet CWA§305(b) requirements for the report. There isn't useful information from the paragraph and the link to the website with multiple documents and links. EPA recommends at

least 1-2 paragraphs of information about what has been transpiring over the last couple of years, and any new challenges, and recommendation as the statute requires.

Page 2, Paragraph 4: The lack of information about the Nonpoint Program's activities, progress, successes, challenges and recommendations for changes does not meet CWA§305(b) requirements. As with the Pollution Control Programs, there is information available and funding applied toward this water program, so a good presentation is warranted.

Comments regarding Chapter 3 of the draft report as they relate to CWA §303(d)

Table 3-6, Page 277: Ruby Lake outlet stream\_01 and Unnamed trib to Oyster River (Milford)-02 will be reassessed by EPA during the next listing cycle for sufficient current progress to remain in category 4b.

Table 3-8, Page 289: CT is delisting North Running Brook to category 2 (fully supporting). The segment had been listed for aquatic life use impairment based on benthic assessments. New benthic assessments and water chemistry data from "2009-2010" time frame show criteria are met. The write-up indicates that there is no "fish community data available" for this segment from the same time frame. Was there data to indicate that the fish community was meeting the aquatic life use standard at the time of the original listing? Please explain how the segment is "fully supporting" for aquatic life use with respect to the fish community.

Table 3-8, Page 295: The write-up on Salmon River states that Station 6234 and 6324 were crossed, but corrected before assessment. Please clarify.

Table 3-8, Page 296: Please explain regarding Housatonic Lake what is meant by "includes extra - error was removed."

Table 3-8, Page 296: Please provide further justification for delisting of the Naugatuck River\_05. The table states that the segment was not supporting in 2010 and that segments above and below remain listed as impaired. When was the USGS data obtained that indicated segment\_05 now meets the recreational use standard?

Table 3-8, Page 298: Connecticut is delisting LIS WB Mid-shoreOffshore Norwalk Islands, which had been impaired for the shellfish harvest for consumption use. The write-up is very long and confusing, and even seems contradictory in one place. The middle of the paragraph reads, "...the 0.697 sq miles=11.86% of the segment now classified as Conditionally Approved means the segment is impaired." Please clarify that this part of the assessment is not related to the current condition of the segment.

EPA New England appreciates your consideration and response to these comments. If you have questions regarding the comments on the Introduction section of the integrated report please contact Diane Switzer, Region I CWA§305(b) Coordinator at 617-918-8377. If your questions

regarding comments on Chapter 3 of the report please contact Mary Garren, Region I CT TMDL/  
CWA§303(d) Coordinator at 617-918-1322.

Sincerely,

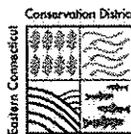
/s/

Mary Garren

cc: Diane Switzer, EPA  
Traci Iott, CTDEEP

# EASTERN CONNECTICUT CONSERVATION DISTRICT, INC.

238 West Town Street  
Road  
Norwich, CT 06360-2111  
06234  
(860) 887-4163, Ext. 400



139 Wolf Den  
Brooklyn, CT  
860-774-9600

[www.ConserveCT.org/eastern](http://www.ConserveCT.org/eastern)

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RE: draft 2012 Water Quality Assessment Report

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Little River in Putnam (3708-00\_01) is listed as impaired for recreation due to exceedances of *E. coli* bacteria. I reviewed what existing data I could find prior to ECCD preparing the Little River/Muddy Brook Watershed Based Plan (2009). The most current data for *E. coli* in that stretch of the river at the time was from beach monitoring at Murphy Park in Putnam. The last year of beach monitoring was in 2006. The impoundment in Little River was damaged in the 2005 flood and the remaining dam structure was removed a few years after. The conditions in Little River at that monitoring station no longer resemble the conditions when the beach monitoring took place. Was Little River assessed in 2009 when DEEP was in the upper Thames Basin doing their more comprehensive review of water quality conditions, or is that impairment based on the older beach monitoring data?

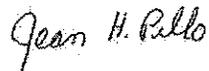
Muddy Brook in North Woodstock (CT3708-01\_02) is listed for not meeting aquatic life support. What is the date of the most current data for this impairment? Again, I am curious if this segment of the monitored by CT DEEP in 2009, or if this impairment is based on old data. The most current data we had when investigating Muddy Brook in North Woodstock was from 1999.

Roseland Lake (CT3708-00-1-L1\_01) is in Woodstock, CT downstream of Muddy Brook (CT 3708-01\_01). It is a non-bathing area due to CT DPH drinking water regulations (within 2 miles of a public drinking water supply intake). The lake borders were severely impacted by *Phragmites australis* but the CT DEEP WHAMM program treated the lake shores in 2006 and the aesthetics of the lake have improved immensely. The lake is visible from the shoreline again. The Connecticut Agriculture Experiment Station conducted an aquatic weed survey in 2012 and reported no aquatic invasive

species were found during their survey work. The lake is commonly used for boating and fishing. DEEP staff conducted a National Lake Assessment in 2007 and repeated it again in 2012. The lake was experiencing a severe algae bloom during their 2012 data collection, which may be related to a minimal amount of submerged aquatic plants present. I am unaware of any bacterial sampling in Roseland Lake. Since the lake is not used as a bathing area, and fishing and boating are the only recreation in the lake, should Roseland Lake still be listed as impaired for recreation?

Please consider these comments and questions when preparing the final draft of the 2012 Water Quality Assessment Report.

Sincerely,

A handwritten signature in cursive script that reads "Jean H. Pillo".

Jean H. Pillo, Watershed Conservation Coordinator  
Eastern Connecticut Conservation District