



Comments
Connecticut Council of Small Towns
Submitted to the
State Department of Energy & Environmental Protection
January 11, 2013
Re: Public Act 12-155 – Phosphorus Reduction

The Connecticut Council of Small Towns (COST) supports the state Department of Energy and Environmental Protection's (DEEP) efforts to implement Public Act 12-155, which directs DEEP to work with municipalities to develop a statewide approach to comply with EPA standards for phosphorus reduction.

More than 40 municipalities are facing multi-million dollar wastewater treatment plant upgrades in order to comply with DEEP's "interim" phosphorus discharge limits, which DEEP and U.S. EPA acknowledge are subject to revision in a few years. Because the proposed limits will be set forth in each plant's National Pollutant Discharge Elimination System (NPDES) permit, there is little opportunity to discuss and develop a statewide approach to phosphorus reduction to improve water quality. This permit-by-permit approach, which is not impacted by Public Act 12-155, imposes a significant burden on certain communities whose permits are up for renewal and creates considerable uncertainty as to how costly plant upgrades will help achieve compliance with statewide phosphorus reduction goals.

Public Act 12-155 will help ensure that the state develops a statewide plan for reducing non-point and point source phosphorus levels based on scientific methods. We are hopeful that this will help ensure that the state:

- 1) Explores less costly treatment options available to municipalities;
- 2) Moves toward an integrated approach to water quality rather than the current piecemeal approach which results in municipalities spending millions of dollars to comply with what is admittedly a moving compliance target;
- 3) Provides municipalities with sufficient time to plan and finance plant upgrades necessitated by phosphorus reduction goals;
- 4) Bases phosphorus reduction goals on proven scientific methods to improve water quality; and
- 5) Alleviates some of the pressure on municipal wastewater plants by addressing non-point sources of phosphorus.

To achieve these goals, COST supports the use of a collaborative model as proposed by the Connecticut Municipal Nutrient Group.

Thank you for the opportunity to submit comments. Please contact COST at 860-676-0770 if you have any questions.