

From: Richard Canavan [mailto:rcanavan@cmeengineering.com]
Sent: Friday, July 24, 2009 4:48 PM
To: Hust, Robert
Subject: Water Quality Standards

Dear Mr. Hust:

I received a forwarded email regarding a comment period for the CT Water Quality Standards. I believe I have missed the comment period so I apologize for the late comment and understand if you choose to disregard it but I felt I ought to mention this anyways. The EPA mandate levels for Ammonium in salt water are only available for waters with a salinity of 10 or more parts per thousand. The CT Water Quality Standards include tidal freshwaters in the salt water classification making it difficult to determine what that standard should be in the upper reaches of our rivers. I understand estuaries are difficult to define in the context of the Water Quality Standards; however, if you are reviewing the standards you might consider the application of the lower of the fresh&salt water standards in waters with salinities that average 1 ppt or less or some other alternative which better addresses the variability at the upper reaches of tidally influence waters.

Good luck with the revisions and sorry for the lateness of my comment.
Friendly regards,
Rick Canavan

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