

STATE OF CONNECTICUT  
DEPARTMENT OF PUBLIC HEALTH



Jewel Mullen, M.D., M.P.H., M.P.A.  
Commissioner

Dannel P. Malloy  
Governor  
Nancy Wyman  
Lt. Governor

Environmental Health Section

August 2, 2012

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

Re: Bacteria Total Maximum Daily Load (TMDL) Comments

Dear Mr. Sullivan:

The Environmental Engineering Program has reviewed the draft document entitled *A Statewide Total Maximum Daily Load Analysis for Bacteria Impaired Waters* prepared by the Department of Energy and Environmental Protection dated June 26, 2012, however the program did not have an opportunity to review the document before it went to public notice, and the program was not invited to participate in the workgroup that developed the draft bacteria TMDL. Attached, for your consideration, are comments prepared by this program on the draft bacteria TMDL. Overall, the program believes that the bacteria TMDL needs to more fully support decentralized sewage system (DSS) management in accordance with guidance from the U.S. Environmental Protection Agency. Comprehensive DSS management would assist statewide and local efforts to reduce bacterial impairment of surface waters, and would support nutrient TMDLs, non-point source pollution programs, as well as drinking water source water protection and recreation programs.

The Department of Public Health supports comprehensive DSS management, and has encouraged your agency to work with us on DSS initiatives that include proactive pollution prevention policies in addition to pollution abatement. Pollution is best addressed by both abatement and prevention. I've also attached two documents that concern DSS management. One document concerns a consultant study that was proposed by your agency several years ago, but was never undertaken. The second concerns the Clean Water State Revolving Fund as it relates to DSS management.



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I'm hopeful that our agencies can have additional discussions on cooperative DSS management initiatives that will assist the above noted programs and efforts.

Sincerely,

A handwritten signature in blue ink, appearing to read "Robert W. Scully".

Robert W. Scully, PE  
Supervising Sanitary Engineer  
Environmental Engineering Program

C: Suzanne Blancaflor, MS, MPH, Chief, Environmental Health Section, DPH  
Lori Mathieu, Chief, Drinking Water Section, DPH  
Ellen Blaschinski, RS, MBA, Chief, Regulatory Services Branch, DPH  
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