

Residuals Committee

Annual Report

June 2016 – May 2017

The Residuals Committee had a very busy year, especially from September through May, and we expect to remain busy with the continuing negotiations with CT DEEP for the General Permits for water treatment residuals. Two years after the Committee submitted revisions to the General Permits for the Discharge of Water Treatment Wastewater (WTW GP), CT DEEP issued modifications to the General Permit for the Miscellaneous Discharge of Sewer Compatible (MISC) Wastewater (MISC GP) and issued the Proposed General Permit for Comprehensive Discharge of Surface Water and Groundwater Compatible Wastewater (Comprehensive GP) on September 30, 2016. MISC GP regulates all discharges to POTWs, including water treatment plant discharges, and Comprehensive GP will regulate all discharges to surface water and groundwater, including water treatment plant discharges. This means that water industry will no longer have a special WTW GP for its discharges. The MISC GP and Comprehensive GP will replace the WTW GP and will become effective probably at the end of March 2018 for the water industry.

When the draft modifications to the MISC GP and new Comprehensive Permit were issued on September 30, 2016, the CT DEEP provided a public comment period of 60 days. The Residuals Committee petitioned for a public hearing for each General Permit and gathered over 130 signatures for each permit with the help of CTAWWA and CWWA. Since October 2016 the Committee met eight times and conducted three conference calls to prepare recommended revisions and to develop strategies for negotiations with CT DEEP. The Committee members also met with CT DEEP 10 times to negotiate the requirements of the general permits from November 2016 to April 2017. Additional meetings are currently anticipated for May and June. The Committee Chair has also met several times with the Boards of CWWA and CTAWWA to update them on the negotiations.

For the modifications to MISC GP, Committee will probably withdraw our request for a public hearing since CT DEEP agreed with most of our recommendations. The Committee was able to convince CT DEEP to allow water treatment residuals to be hauled to POTWs from sewered and unsewered areas. In addition, it will no longer be a violation if the suspended solids exceed 600 mg/L instead exceeding this concentration will require a study to evaluate alternative disposal methods and analyses of the residuals for metals. Analysis for aluminum will not be required for the wastewater or the concentrated residuals.

For the Comprehensive GP, the negotiations were more difficult. CT DEEP and the Committee were unable to agree upon limits for aluminum, manganese and iron for discharges to groundwater and surface water. Both CT DEEP and Committee agreed that adequate data was not available to establish limits. Currently, we are negotiating to determine limits to be used until adequate data becomes available. If we cannot agree on the limits, we will probably have a public hearing.

The Committee anticipates the final general permits will be issued in September 2017 and become effective in March 2018. The Committee would like to thank the Boards of CWWA and CTAWWA for their support during these negotiations.

Respectively,

Paul Malmrose, P.E., Chair – Residuals Committee