

CONNECTICUT ENVIRONMENTAL FORUM

Presented by: **Audra Dickson, Director**
Water Permitting & Enforcement Division

TOPICS

- **Leadership Team**
- **General Permit Status**
- **PFAS**
- **Underground Injection Control**
- **Completed Projects**
- **In the Works**



NEW LEADERSHIP

Vacant,

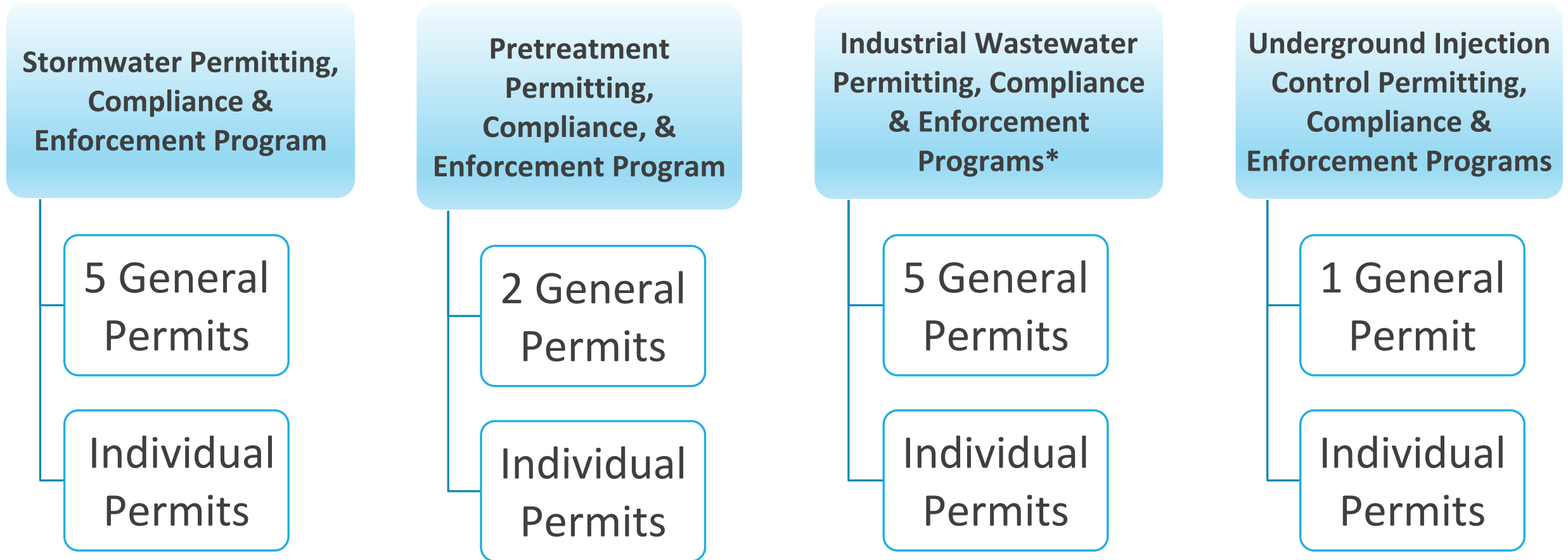
Assistant Director


Carleen Moody,

Water Compliance, Enforcement, & CAFO Supervisor

Water Permitting & Enforcement Program

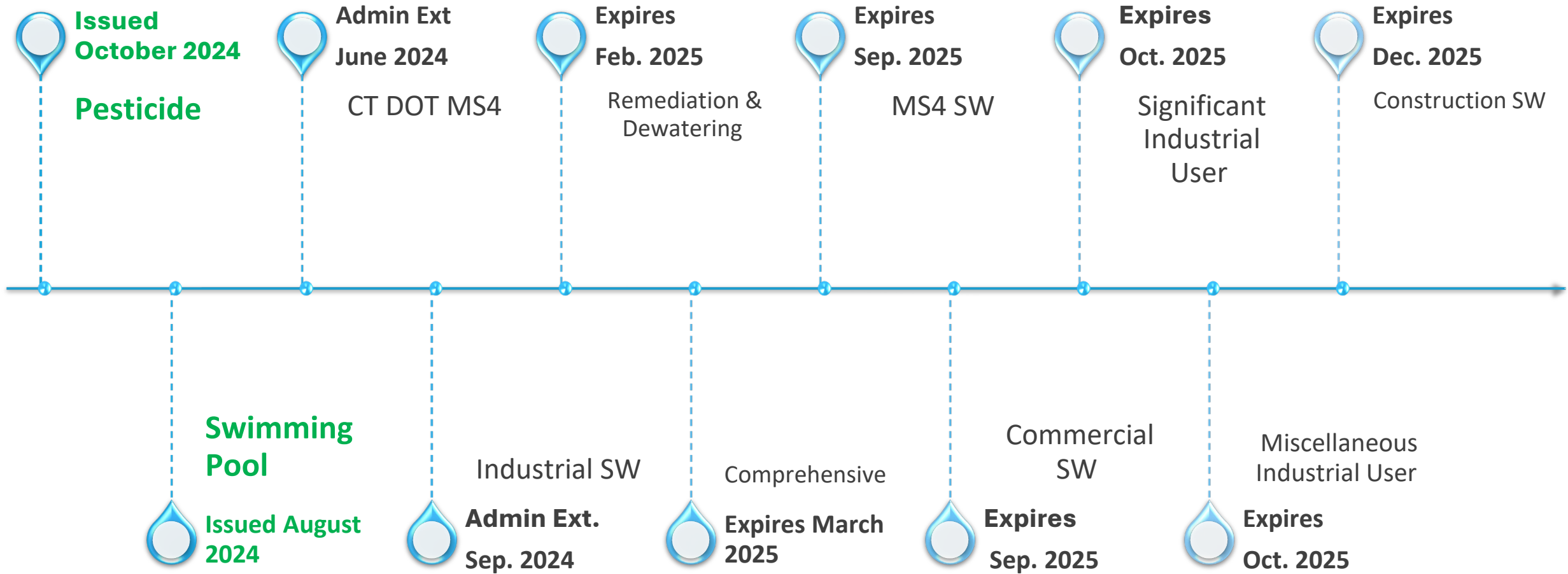
DIVISION OVERVIEW



The background features a stylized landscape with a yellow sun in the top right, a green hill in the middle, and a blue body of water at the bottom. The elements are separated by thick, dark blue wavy lines.

General Permit Updates

GENERAL PERMITS



GENERAL PERMIT REISSUANCE STEPS



GENERAL PERMITS

Name of Permit	Permit Dates	Next Steps	Draft Proposed Changes
Commercial Stormwater General Permit	Effective: 10/1/2023 Expiration: 9/30/2025	<ul style="list-style-type: none">Data gap analysis & drafting permit	<ol style="list-style-type: none">Effluent monitoringStormwater PlanEvaluate eligibility
Small Municipal Separate Storm Sewer Systems (MS4s) General Permit	Effective: 10/1 2023 Expiration: 9/30/2025	<ul style="list-style-type: none">Stakeholder session held January 2024Workshops in April 2024Drafting permit	<ol style="list-style-type: none">Add new towns based on census dataExplore tiered approachExplore treatment credits
DOT MS4 General Permit	Effective: 7/1/2019 Admin Ext: 6/30/2024	<ul style="list-style-type: none">Public notice postedPetition Filed	Petition filed by Save the Sound
Industrial Stormwater General Permit	Effective: 10/1 2023 Admin Ext: 9/30/2024	<ul style="list-style-type: none">Public noticed March 2024Evaluating CommentsOnboarding eRule	<ol style="list-style-type: none">Added industrial sectorsRefined benchmarksNew registration (eRule)Multi-sector format
Construction Stormwater General Permit	Effective: 12/31/2020 Expiration: 12/20/2025	<ul style="list-style-type: none">Data gap analysis & drafting permitListening Session 2025Onboarding eRule	In development

GENERAL PERMITS

Name of Permit	Effective	Next Steps	Proposed Changes
Swimming Pool Discharge	Issued: 7/10/2024 Effective: 8/1/2024 Expiration: 7/9/2029	Complete	<ol style="list-style-type: none"> Pilot automatic permit coverage Tiered disposal system New effluent limits and BMPs
Significant Industrial User	Effective: 10/30/2020 Expiration: 10/30/2025	<ul style="list-style-type: none"> Stakeholder listening session held January 2024 Data gaps & drafting 2nd Stakeholder session November 21, 2024 	<ol style="list-style-type: none"> Review Definitions Add Remediation System Add Swimming Pool Evaluate QPE requirement Streamline registration process
Miscellaneous Industrial User	Effective: 9/29/2020 Expiration: 10/30/2025	<ul style="list-style-type: none"> Stakeholder listening session held January 2024 Data gaps & drafting 2nd Stakeholder session December 4, 2024 	<ol style="list-style-type: none"> Review Definitions Add Swimming Pool Discharges & Remediation System Evaluate QPE requirement

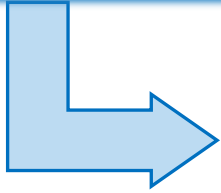
GENERAL PERMITS

Name of Permit	Effective	Next Steps	Proposed Changes
Pesticide	Issued: 10/22/2024 Effective: 10/22/2024 Expiration: 10/21/2029	<ul style="list-style-type: none"> Public outreach Onboarding eRule 	<ol style="list-style-type: none"> Pilot automatic permit coverage Visual monitoring
Groundwater Remediation & Dewatering	Effective: 03/01/2023 Expiration: 2/28/2025	<ul style="list-style-type: none"> 2nd Listening session April 2024 PN summer 2024 Evaluating public comments 	<ol style="list-style-type: none"> Short term discharges Refine approval process Clarify permit language
Comprehensive	Effective: 04/01/2023 Expiration: 3/30/2025	<ul style="list-style-type: none"> Data gap identified & soliciting targeted feedback PN fall 2024 Evaluating public comments Petition Filed 	<ol style="list-style-type: none"> Add pressure washing Remove 7Q10 flow restriction Evaluate effluent limits & requirements for similar discharges Clarify permit language

INDUSTRIAL STORMWATER GENERAL PERMIT

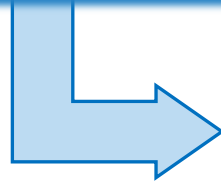
2023

- Technical Development



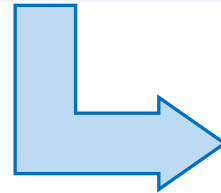
Public Comment Period

- March to April 2024



Review Public Comments

- 100+ public comments under review & consideration



Permit Issuance

- Targeting January 2025

PFAS UPDATES

CWA Analytical Methods for Per- and Polyfluorinated Alkyl Substances (PFAS)

The EPA developed two new analytical methods to test for PFAS compounds in wastewater, as well as other environmental media.

On this page:

- [Background](#)
- **NEW** [Method 1633 for 40 PFAS Compounds](#)
- **NEW** [Method 1621 for Adsorbable Organic Fluorine](#)
- **NEW** [Documents](#)
- [Related Information](#)



Next Step

EPA will publish the methods in the federal register (40 CFR 136)

<https://portal.ct.gov/DEEP/Remediation--Site-Clean-Up/PFAS-Task-Force/PFAS-Task-Force>

<https://www.epa.gov/cwa-methods/cwa-analytical-methods-and-polyfluorinated-alkyl-substances-pfas>

PFAS UPDATES

September 2024 EPA Published Final Recommended Aquatic Life Criteria and Benchmarks for Select PFAS

National recommended aquatic life criteria for PFOA in freshwater

- acute and chronic criteria for freshwaters.
- chronic criteria expressed as tissue-based concentrations to protect aquatic life from bioaccumulation

National recommended aquatic life criteria for PFOS in freshwater

- acute and chronic criteria for freshwaters
- chronic criteria expressed as tissue-based concentrations to protect aquatic life from bioaccumulation

National aquatic life benchmark values for 8 individual PFAS

<https://www.epa.gov/wqc/pfas-and-aquatic-life>

PFAS UPDATES

Table 1. Final Recommended Freshwater Aquatic Life Water Quality Criteria for PFOA and PFOS

Criteria Component	Acute Water Column (CMC) ¹ (mg/L)	Chronic Water Column (CCC) ² (mg/L)	Invertebrate Whole-Body (mg/kg ww ³)	Fish Whole-Body (mg/kg ww ³)	Fish Muscle (mg/kg ww ³)
PFOA Magnitude	3.1	0.10	1.18	6.49	0.133
PFOS Magnitude	0.071	0.00025	0.028	0.201	0.087
Duration	1-hour average	4-day average	Instantaneous	Instantaneous	Instantaneous
Frequency	Not to be exceeded more than once in three years, on average	Not to be exceeded more than once in three years, on average	Not to be exceeded	Not to be exceeded	Not to be exceeded

¹ Criterion Maximum Concentration.

² Criterion Continuous Concentration.

³ Wet Weight.

PFAS UPDATES

Table 2. Acute Saltwater Aquatic Life Benchmarks for PFOA and PFOS

Chemical	PFOA (mg/L)	PFOS (mg/L)
Magnitude	7.0	0.55
Duration	1-hour average	
Frequency	Not to be exceeded more than once in three years on average	

Table 3. Acute Freshwater Aquatic Life Benchmarks for Eight PFAS

Chemical	PFBA (mg/L)	PFHxA (mg/L)	PFNA (mg/L)	PFDA (mg/L)	PFBS (mg/L)	PFHxS (mg/L)	8:2 FTUCA (mg/L)	7:3 FTCA (mg/L)
Magnitude	5.3	4.8	0.65	0.50	5.0	0.21	0.037	0.012
Duration	1-hour average							
Frequency	Not to be exceeded more than once in three years on average							

UIC REGULATION CHANGE

Public Act 23-207, § 27 amended Section 22a-430(g)

- Requires the Commissioner of the Department of Public Health adopt regulations to establish and define categories of discharges that constitute small community sewerage systems and household and small commercial subsurface sewage disposal systems no later than July 1, 2025.
- Public Act instructed the Commissioner of DEEP to delegate authority of household and small commercial subsurface sewage disposal systems to 10,000 gallons per day or less and authorized the same threshold for small community sewerage systems to the Commissioner of Public Health.
- These amendments transfer permitting authority for a number of facilities subject to DEEP regulation to the Department of Public Health.
- DEEP and DPH are working closely together to plan for the transfer of jurisdiction of impacted systems. The agencies are coordinating their efforts including updating the relevant regulations and technical standards to meet the statutory requirements for the transfer.

A stylized, colorful landscape illustration. At the top right, a bright yellow sun is partially visible. Below it, a large, vibrant green hill dominates the middle ground. The hill is outlined with a thick, dark blue border. To the left, a smaller, light green hill is partially visible. At the bottom, a light blue area represents water, also outlined with a thick, dark blue border. The overall style is simple and graphic.

Completed Projects & In the Works

COMPLETED PROJECTS



NetDMR Subscriber Agreements

Establishing an email box to receive signed and scanned subscriber agreements

Outreach Spring/Summer 2023



PFAS Memo

Develop PFAS Memo

Spring 2024



Noncompliance Report Form

Development of a universal noncompliance report form for industrial wastewater & pretreatment permittees

December 2023



Online Complaint Intake Platform

Development of an online complaint intake portal

Summer 2024



PROJECTS IN PROCESS



E-Reporting

Phase II Implementation Plan
MOU signed with US EPA

Deadline 2025



Records

Migrating from paper
to electronic records

Ongoing



Update PFAS Memo

Update memo to
reflect revised
application & analytical
method

Target Q2



Revise Application

Revise application to
reflect federal NPDES
Update Rule & PFAS
screening

Target Q3/Q4



General Permits

General permit reissues

Ongoing



ONLINE NONCOMPLIANCE REPORTING

- Soft launch December 2023
- Allows Compliance & Enforcement Teams to triage, track, & respond in real time
- Record retention



Noncompliance Notification Form

Facilities with discharge permits issued by DEEP's Water Permitting and Enforcement Division ("WPED"), both individual and general permits, are required to notify DEEP of noncompliance with permit terms and conditions and/or Section 22a-430 et al. of the Regulations of the Connecticut State Agencies ("RCSA"). This form is intended for Permittees to electronically notify DEEP of instances of noncompliance. This form is not intended for notification of noncompliance at publicly owned treatment works.

Submission of this form does not relieve a Permittee of additional notification and reporting requirements in its discharge permit or state and federal regulations. Check your permit and RCSA for additional requirements, which may include written reports and additional sampling. The following link for notification requirements may be useful, but please note this link serves as a guide and does not supersede requirements in your discharge permit and/or RCSA: <https://portal.ct.gov/DEEP/Water-Regulating-and-Discharges/Industrial-Wastewater/Compliance-Assistance/Notification-Requirements>

For bypasses, spills, or environmental emergencies, you must also call DEEP's Emergency Response Unit at (860) 424-3338.

You will receive a copy of your notification to the email address provided upon submission.

Fillable Form

* Required

Contact Information

1. Facility Name: *

2. Town Facility is Located: *

3. Permit Number: *

Please capitalize all letters in the permit number and ensure you are entering a 9-character permit number. If the permit number is not entered exactly as it appears on the permit, your submission will not be received properly.

4. Contact Name: *

5. Contact Title: *

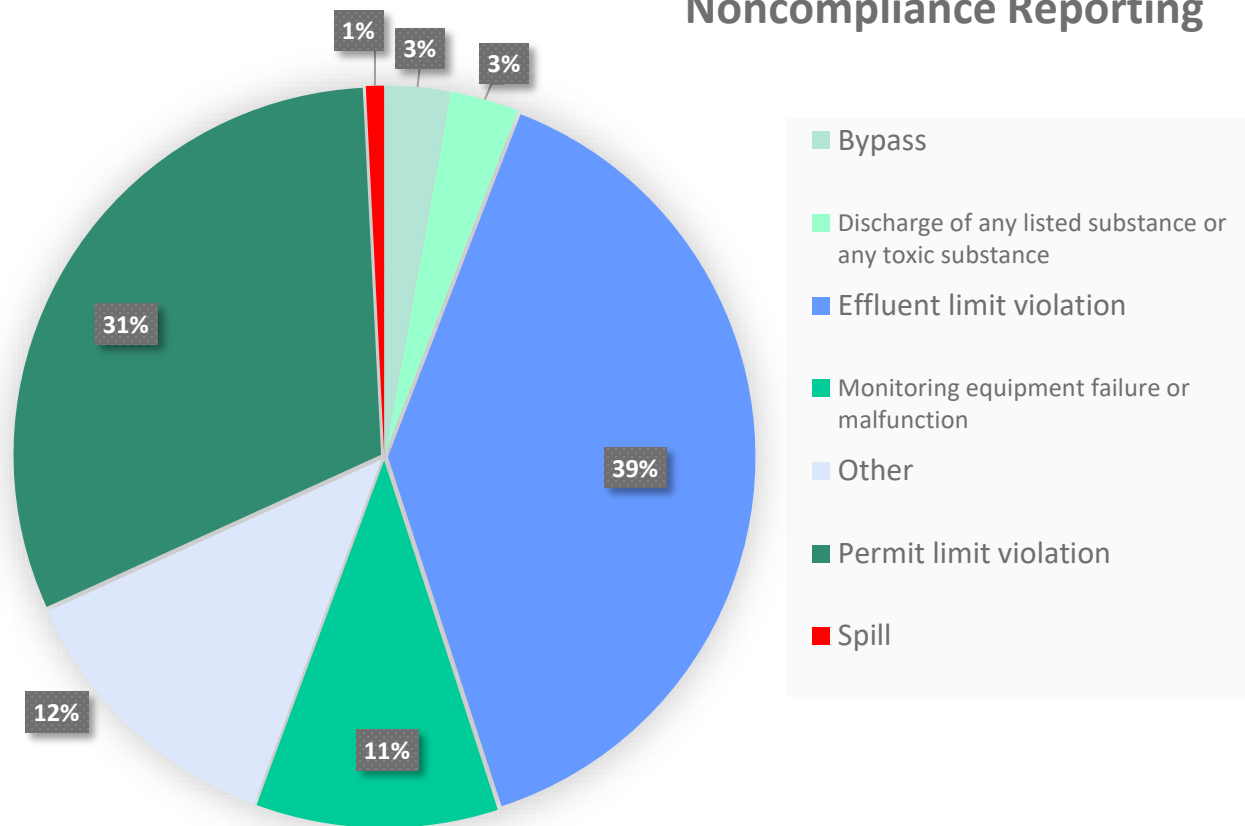
6. Contact Email Address: *

7. Contact Phone Number: *

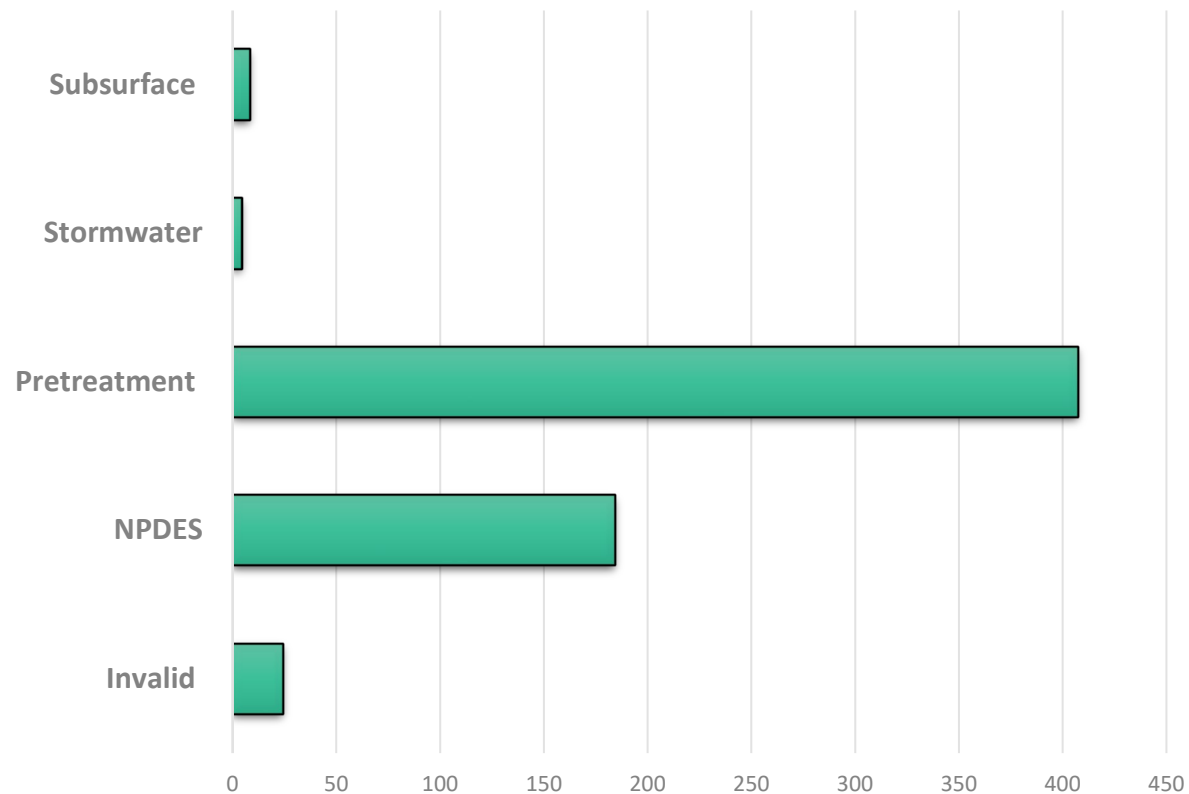
Please use the (###) ###-#### format.

ONLINE NONCOMPLIANCE REPORTING

Noncompliance Reporting



Noncompliance Reporting



ONLINE NONCOMPLIANCE REPORTING

Working on Version 2.0

- ❖ Include common Stormwater benchmark exceedances
- ❖ Include common General Permit noncompliance
- ❖ Determine if photos can be uploaded
- ❖ Provide guidance on the level of information needed

Permit Nomenclature

Underground Injection Control / Subsurface	NPDES	Pretreatment	Stormwater
UI	CT	SP	GSI
GSSD	CTCSG	CTP	GSN
CTCGW	CTCSW	CTSIU	GSM
CTRGW	CTRSW	CTMIU	GSC
	CTPGP	GPL	GSE
		GDS	
		CTRSS	

E-RULE

- ❖ Memorandum of Agreement with US EPA
- ❖ Partnership with EPA to utilize e-platforms
- ❖ Training will be provided to internal & external stakeholders
- ❖ Development underway for Industrial Stormwater Permit

The screenshot displays the DEEP eFiling System interface. At the top, it shows the State of Connecticut logo and Governor Ned Lamont's name. The main header identifies the Department of Energy & Environmental Protection. A navigation bar includes a welcome message for 'Burcu2 Yavuz2!', a shopping cart icon for '0 Unpaid Filings', and an envelope icon for '3 Unread Messages'. A red banner below the navigation bar states 'THIS IS A TEST ENVIRONMENT'. The main content area is titled 'eFiling System' and shows the breadcrumb trail: 'My Home > Stormwater - Industrial > Site Details > New Industrial Activities'. A navigation bar below the breadcrumb trail includes 'Overview', 'Form Info' (highlighted), 'Attach', 'Submit', and 'Pay'. The main form area is titled 'New Industrial Activities' and contains the following questions and options:

Please answer the following question(s).

Are you on a site where industrial activity has been previously located? Yes No

Are you proposing a new industrial activity on a site where industrial activity has not been previously located? Yes No

The left sidebar contains the following links: DEEP Home, Permits & Licenses, Getting Started, Search e-Filings, Submit/View Public Comments, FOIA, DEEP, Help, My Home/Filings, Account Manager, Messages, Subscriber Agreements, and Need to File?.

E-RULE

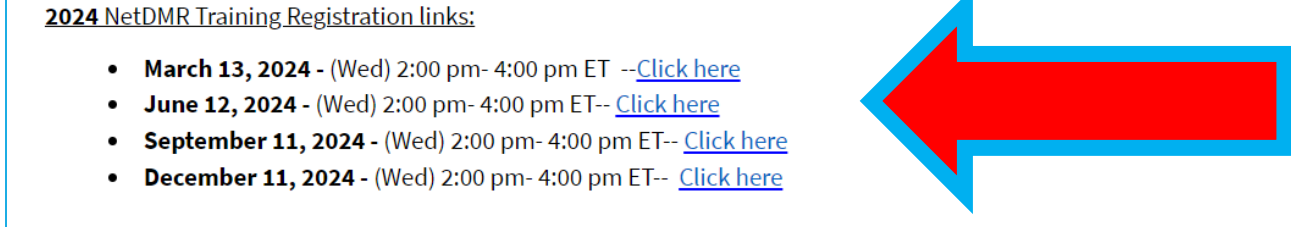
HTTPS://USEPA.SERVICENOWSERVICES.COM/OECA_ICIS?ID=NETDMR_HOMEPAGE


The screenshot shows the NetDMR Support homepage. At the top left is the EPA logo with the text "United States Environmental Protection Agency". To the right are links for "Home", "FAQs", "Ask A Question", and "Login". Below this is a blue navigation bar with "Environmental Topics", "Laws & Regulations", "Report a Violation", and "About EPA". The main heading is "Welcome to NetDMR Support" next to the NetDMR logo. Below the heading is a blue bar for "Announcements for NetDMR". The main content area consists of a 3x3 grid of blue buttons with white icons and text. A red circle highlights the "User Guides & Training Materials" button in the top-middle position.

Launch NetDMR	User Guides & Training Materials	FAQs
New Users	Training Schedule	Contact List
Password Reset	Maintenance Schedule	Ask a Question

E-RULE

HTTPS://USEPA.SERVICENOWSERVICES.COM/OECA_ICIS?ID=NETDMR_HOMEPAGE



 United States Environmental Protection Agency

[Environmental Topics](#) [Laws & Regulations](#) [Report a Violation](#) [About EPA](#)

[Home](#) > [Knowledge](#) > [NeT Homepage](#) > [Training - For Permittees - Additional Training Information](#)

2024 NetDMR Training Registration links:

- **March 13, 2024** - (Wed) 2:00 pm- 4:00 pm ET --[Click here](#)
- **June 12, 2024** - (Wed) 2:00 pm- 4:00 pm ET-- [Click here](#)
- **September 11, 2024** - (Wed) 2:00 pm- 4:00 pm ET-- [Click here](#)
- **December 11, 2024** - (Wed) 2:00 pm- 4:00 pm ET-- [Click here](#)

These webinars will provide NetDMR users with a basic understanding of how to access and navigate the NetDMR tool for the purpose of electronically reporting Discharge Monitoring Report (DMR) data. Topics include creating an account, requesting access to a NPDES ID, entering DMR data, signing and submitting DMRs, importing DMR data, and COR management.

After registering, you will receive three emails in total:

- 1 confirmation email (upon successful registration),
- 1 reminder email the day prior to the event, and
- 1 reminder email an hour prior to the event.

A copy of the PowerPoint used during training will be available for download on this page (On the RIGHT side of this page under Attachments).

CONTACT INFORMATION

WATER PERMITTING AND ENFORCEMENT DIVISION

Director - Audra Dickson 860-424-3056 Audra.Dickson@ct.gov

Vacant

Wastewater Permitting & Enforcement Division 860-424-3025 DEEP.WaterPermittingEnforcement@ct.gov

DEEP.WaterPermittingEnforcement@ct.gov

New

Water Compliance, Enforcement, & CAFO Program, Supervisor - Carleen Moody 860-424-3291

Net DMR Subscriber Agreement:
DEEP.netdmr@ct.gov

Concentrated Animal Feeding Operation:
CAFO.coordinator@ct.gov

Stormwater Permitting, Compliance & Enforcement Program, Supervisor Karen Allen 860-424-3842 DEEP.StormwaterStaff@ct.gov

CONTACT INFORMATION

Underground Injection Control Program, Supervisor - Lauren Jones	860-424-3155	DEEP.WaterPermittingEnforcement@ct.gov
Industrial NPDES Wastewater Permitting Program, Supervisor - Nick Giannetti	860-424-3025	DEEP.WaterPermittingEnforcement@ct.gov Net DMR Subscriber Agreement: DEEP.netdmr@ct.gov
Industrial Pretreatment Permitting & Enforcement Program, Supervisor Nancy Wollenberg	860-424-3069	General Pretreatment Inquiries/Notifications: DEEP.WaterPermittingEnforcement@ct.gov MIU General Permit Notifications: DEEP.MIUGPnoncompliance@ct.gov To submit e-copies of SIU General Permit Registrations: DEEP.IndustrialWastewaterGeneralPermits@ct.gov Net DMR Subscriber Agreement: DEEP.netdmr@ct.gov