



NEWEA
WORKING FOR WATER QUALITY

Truth or Fiction:

**ARE NEW NPDES LIMITS COMING TO THE
CONNECTICUT RIVER WATERSHED?**

**Sue Guswa & Paul Hogan | Woodard & Curran
NEWEA 2018 Annual Conference | January 24, 2018**

COMMITMENT & INTEGRITY DRIVE RESULTS

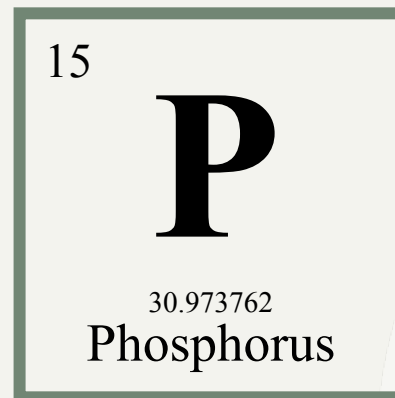
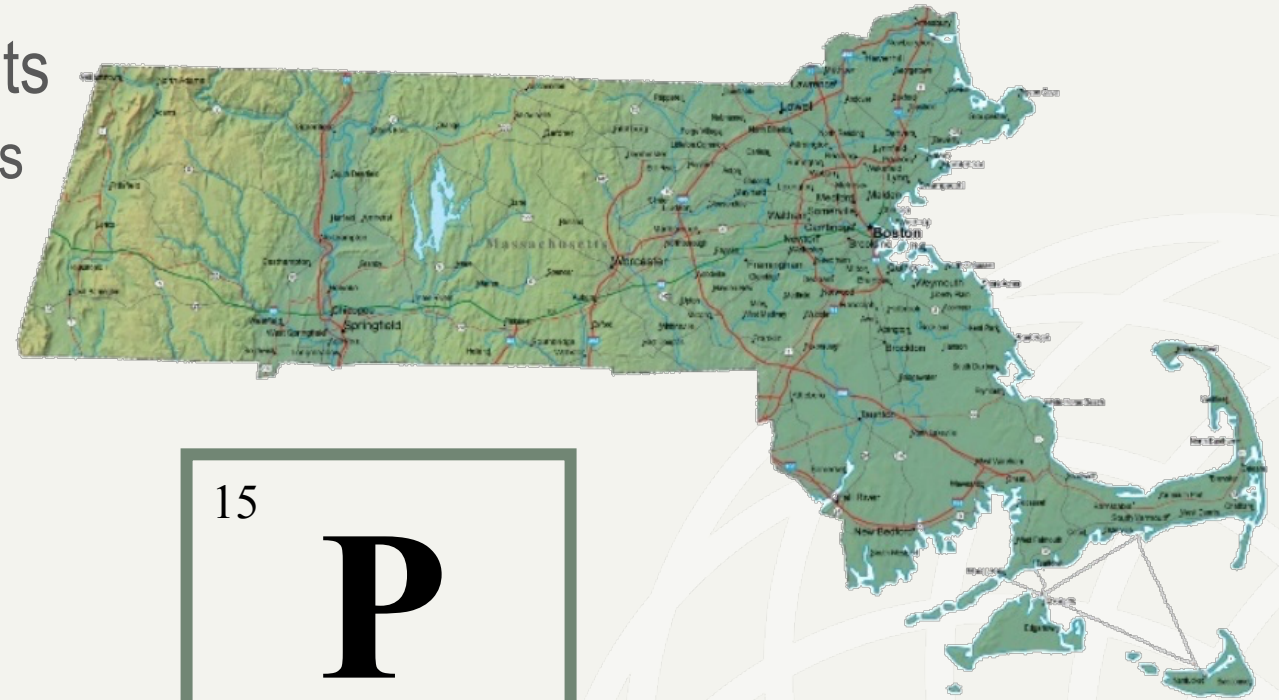
Acknowledgement and Thank You !!

1. USEPA Regions 1 & 2
2. MassDEP
3. Springfield Water & Sewer Commission and other potentially-affected communities
4. Pioneer Valley Planning Commission
5. CT River Conservancy
6. Other Stakeholders



Current Issues

- Nitrogen
- Phosphorus and metals limits
 - Tributaries already have limits
 - Future focus on CT River?
 - Metals – aluminum
- Collection system
- MA Delegation
 - MA legislation proposed
 - Likely timeline 2-5 years



Are Nitrogen Limits Coming to Western MA?

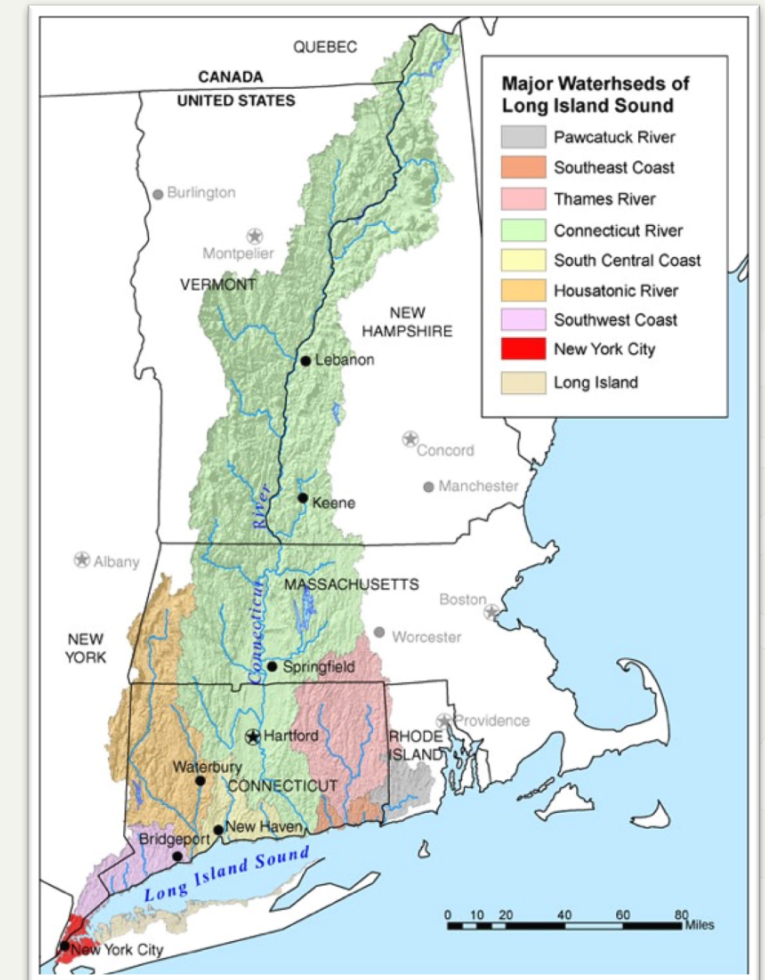
- Questions:
 - If ?
 - When ?
 - What levels ?

- Two Drivers:
 - LIS Nitrogen TMDL
 - LIS Nitrogen Reduction Strategy



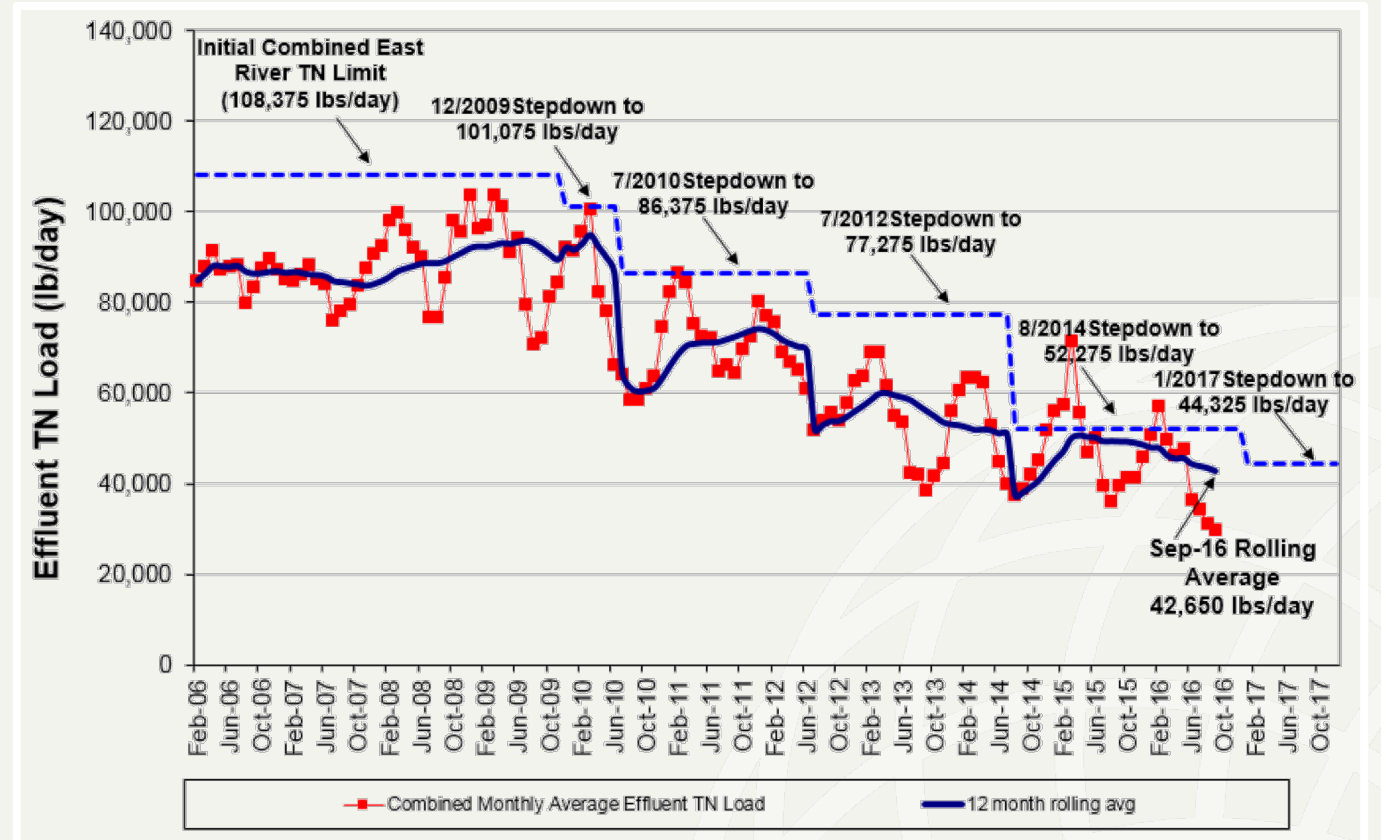
The Beginning: 2000 LIS TMDL

1. Cap 1990 loads
2. Low cost retrofits
3. 58% reduction TN CT/NY WWTPs
4. Reduction 25% upper basin, 10% NPS, 18% atmospheric deposition
5. “Non-treatment: aeration, relocation outfalls, artificial wetlands, tide gates”

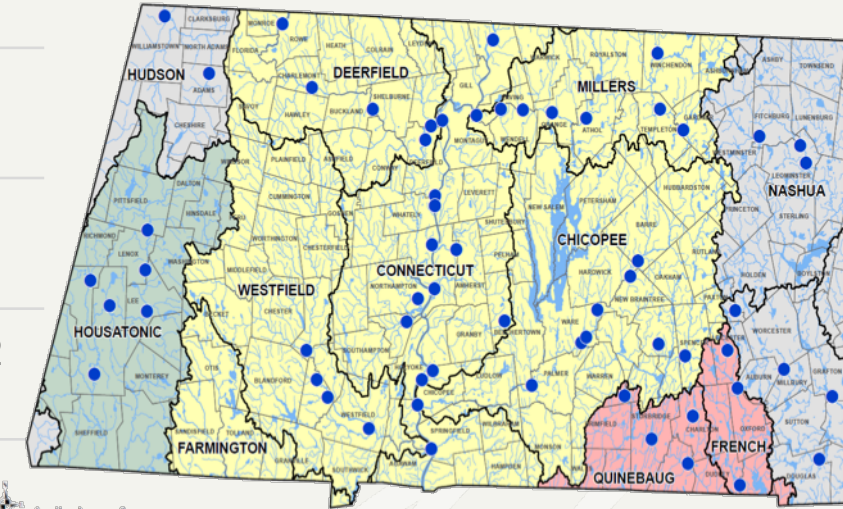
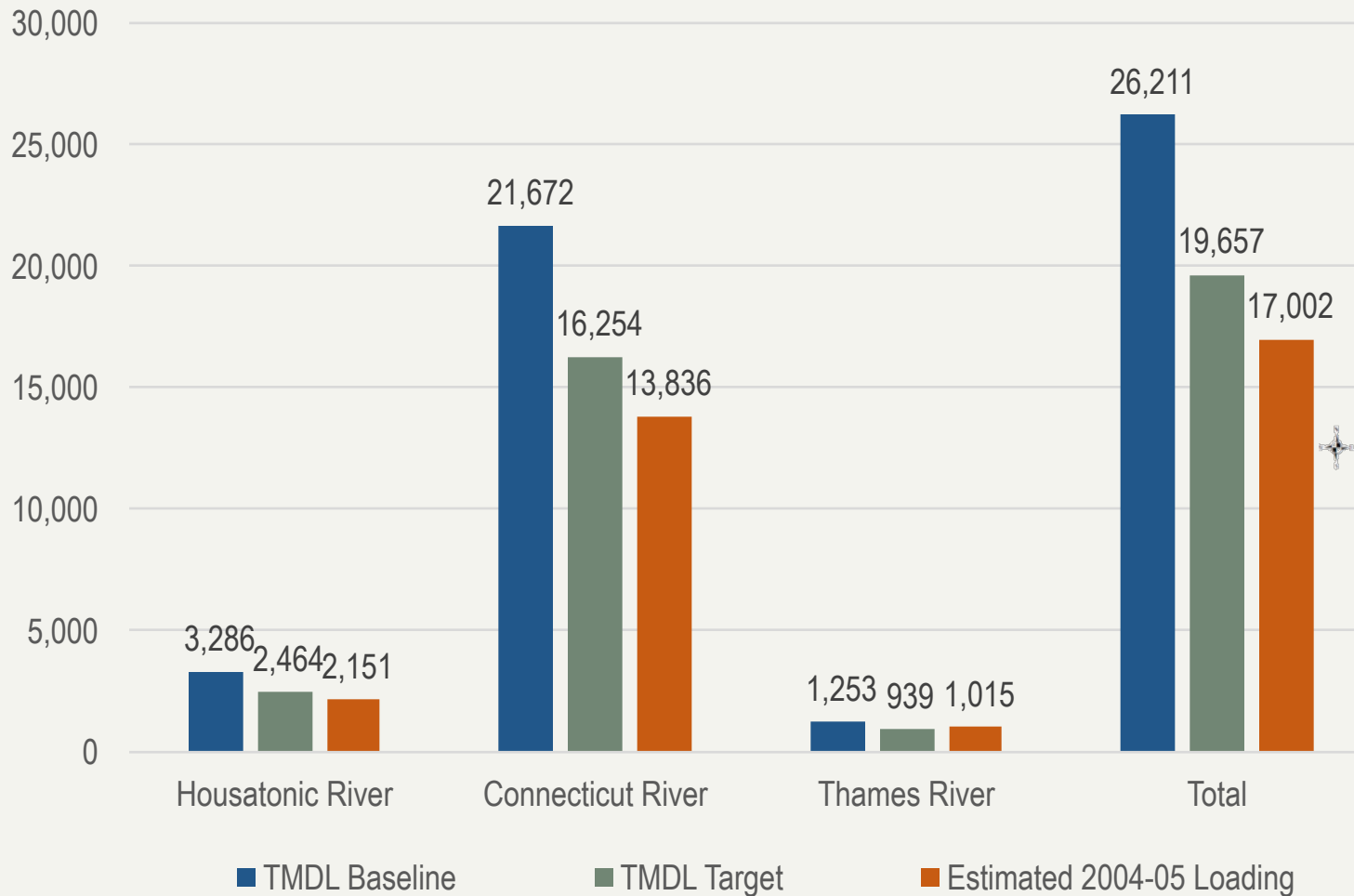


The “End”: TMDL Implementation

- CT TN Trading & General Permit
- Met 2014 TN Goals
- Tracking NPS
- Money spent upgrading WWTP
- Upper States meeting TMDL targets



Upper States Estimated MA Nitrogen Loads

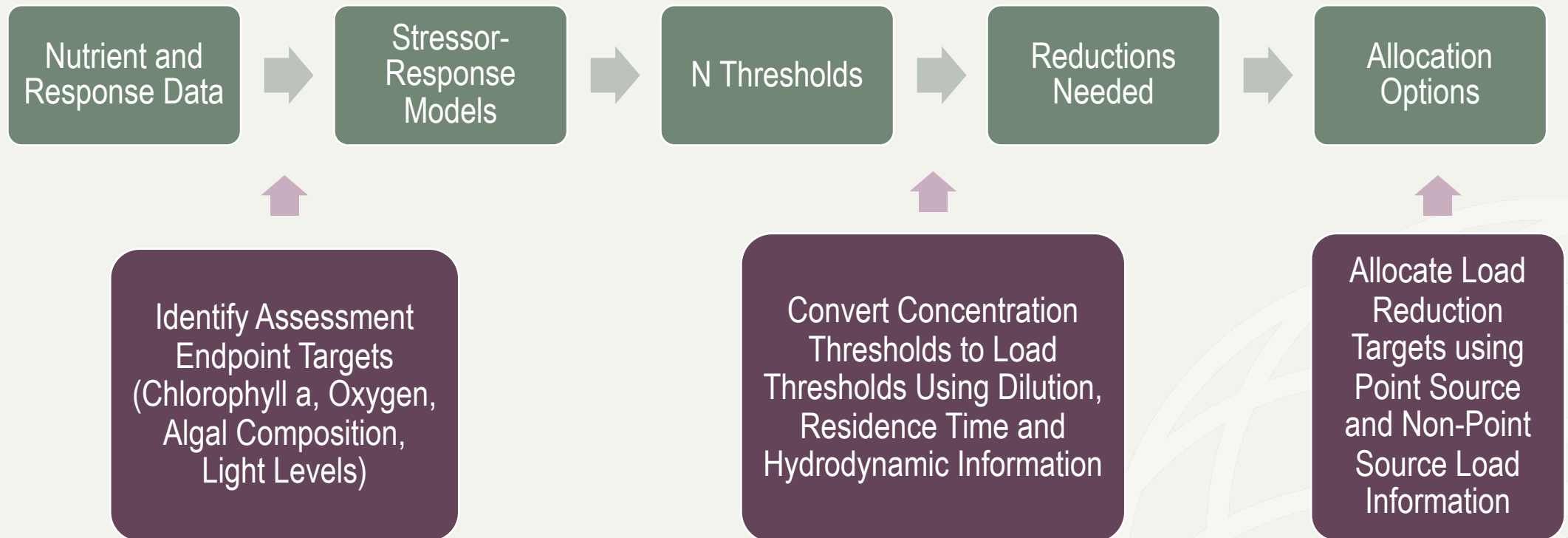


The Sequel: Still Being Written

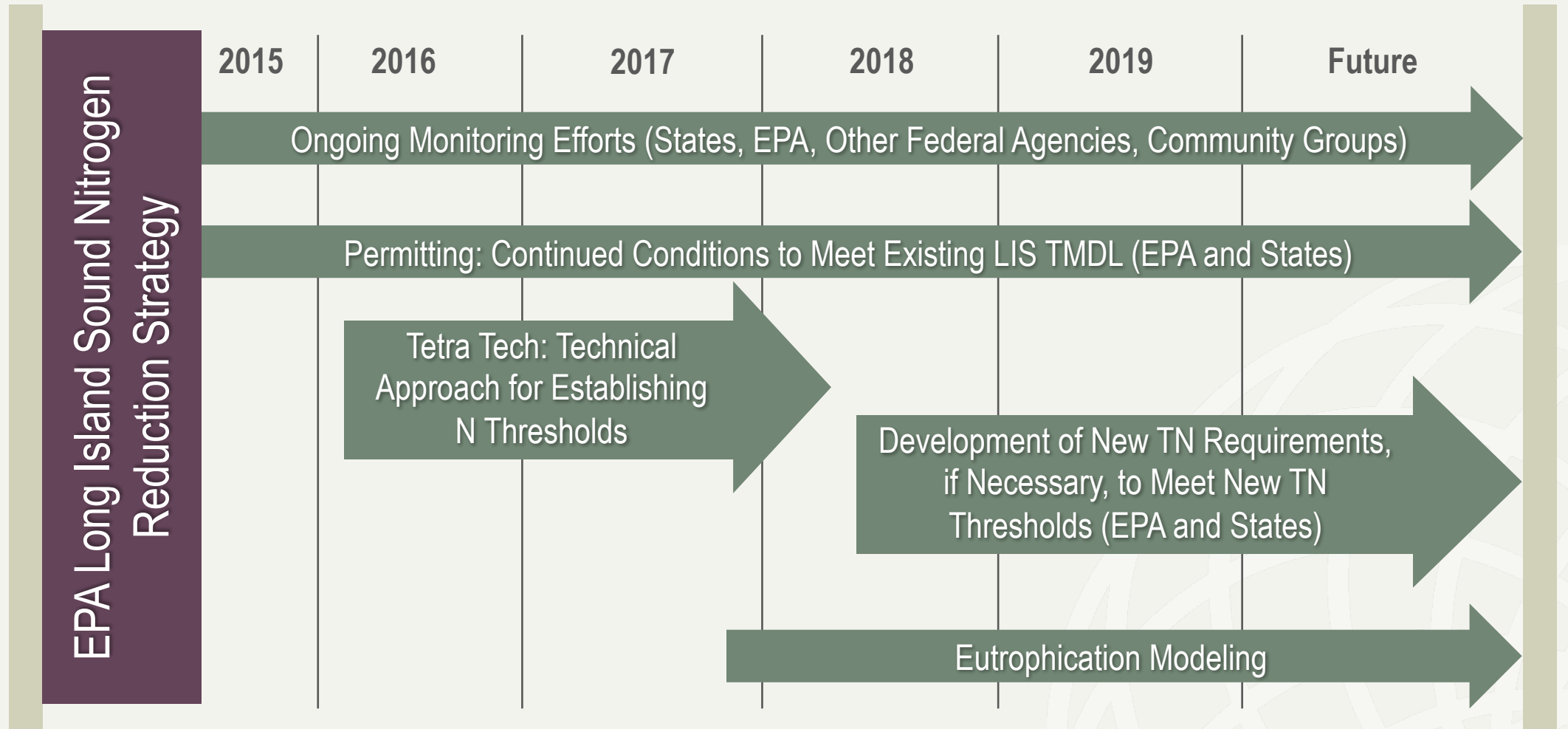
- December 2015 EPA letter to adjust program
- Eutrophication-related impacts
- Three watershed groupings
 - Coastal watersheds
 - **Upland tributaries (CT River)**
 - Western LIS WWTPs
- Tetra Tech is contractor
- Longislandsoundstudy.net



Long Island Sound Nitrogen Reduction Strategy

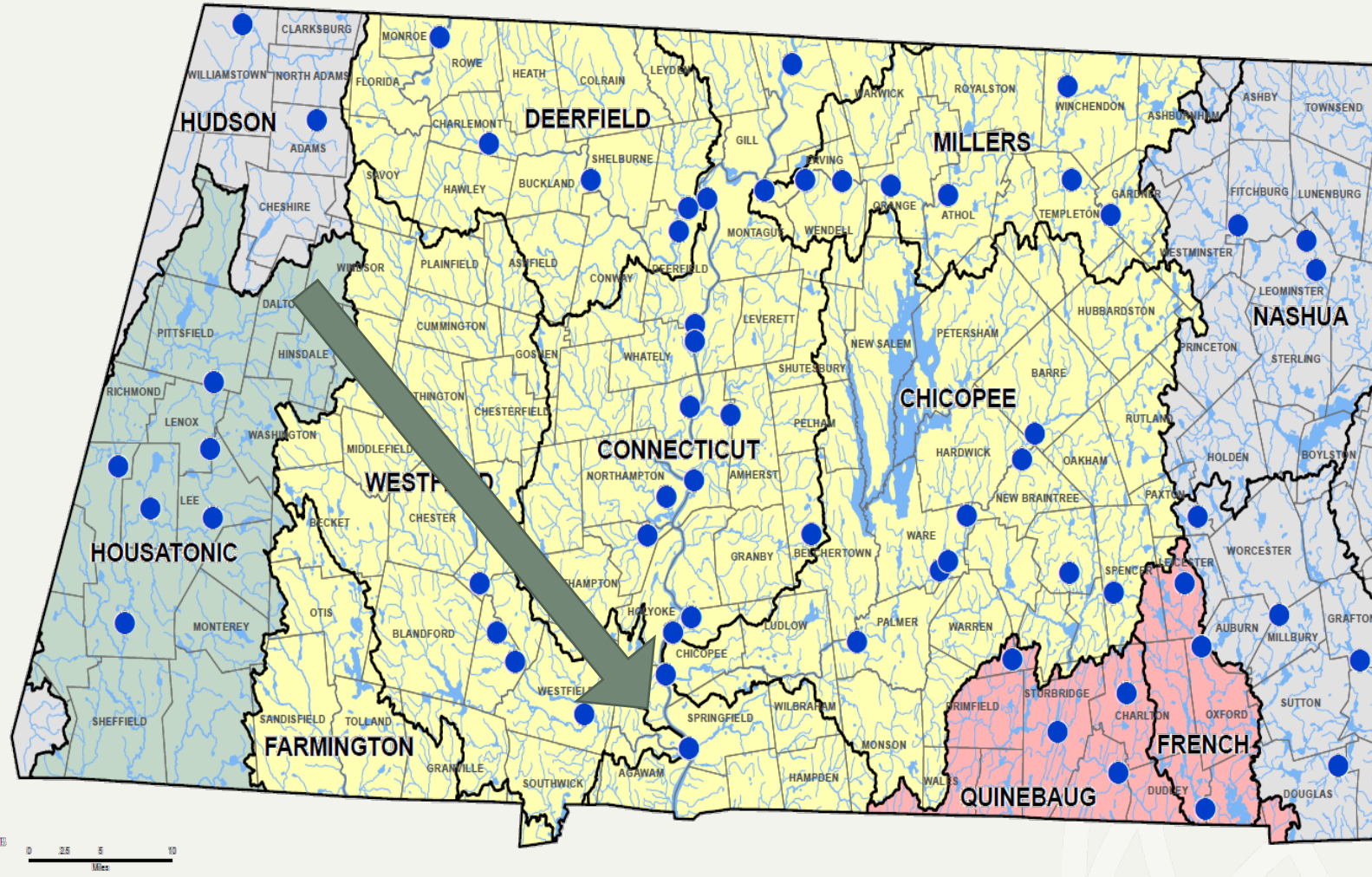


What is the Timeline?





Springfield Water & Sewer Commission Regional Wastewater Treatment Facility



Springfield WSC Draft NPDES Permit

- NPDES Permit Status
 - Expired February 2006
 - Draft Permit Renewal issued for public comment in November 2017
 - Comment period was extended to February 12, 2018
- Nitrogen Optimization
 - Goal: maintain current loading benchmark
 - Benchmark based on 2012-2016 average annual load
 - Range: 1,650 – 2,534 lbs/day
 - Average: 2,279 lbs/day
- 2004-2005 TN Load: 1,628 lbs/day
- Based on DMR data, 2014 CT River out-of-basin TN load = 11,820 lbs/day
 - Approximately 2,000 lbs/day less than 2004-05 load of 13,836 lbs/day



Springfield Water & Sewer Commission's Fact Sheet

- Options presented for nitrogen control

Option	Loading Benchmark	Concentration Benchmark
Draft Permit Proposal	2,279 lbs/day	None
Alternative 1	2,534 lbs/day	8 mg/L
Alternative 2	None	8 mg/L

- Looking for input during comment period
- “No final determination with respect to nitrogen conditions has been made”
- Regional consolidation of flow and load allocated to another facility could be applied to Springfield's benchmark

Looking Ahead: Call to Action!

- Springfield Water & Sewer Commission Draft Permit Comments – Due February 12, 2018
- Long Island Sound Nitrogen Reduction Strategy
 - Potential Nitrogen Reductions beyond TMDL – Spring 2018
 - Identification of Allocation Strategy
- USGS CT River Flow Gage & Sampling – Began December 2017
- Connecticut River Conservancy – Grant to develop monitoring strategy
- PVPC – Stakeholder Discussion of Nitrogen Allocation, General Permit & Trading



Thank You! Questions?



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