



Permitting for Environmental Results (PER)

NPDES Profile: Connecticut and Indian Country

PROGRAM RESPONSIBILITY

State of Connecticut: State of Connecticut: NPDES authority for base program, general permitting, federal facilities, pretreatment

EPA Region 1: NPDES authority for biosolids

EPA Region 1: NPDES authority for all facilities in Indian Country

Program Integrity Profile

This profile characterizes key components of the National Pollutant Discharge Elimination System (NPDES) program, including program administration and implementation, environmental outcomes, enforcement, and compliance. EPA considers profiles to be an initial screen of NPDES permitting, water quality, enforcement, and compliance programs based on self-evaluations by the States and a review of national data. EPA will use the profiles to identify program strengths and opportunities for enhancements. For more information, contact Art Maugher, Connecticut Department of Environmental Protection, at 860-424-3829, or Roger Janson, EPA Region 1, at 617-918-1621.

Section I. Program Administration

1. Resources and Overall Program Management

The State of Connecticut:

The NPDES program is managed by two divisions within the Connecticut Department of Environmental Protection (CTDEP), Water Management Bureau. The Planning Division issues and enforces all NPDES permits for wastewater treatment plants including publicly owned treatment works (POTWs). The Planning Division also manages the aquatic toxicity program, water quality standards, stream monitoring, and total maximum daily loads (TMDLs). The Permits and Enforcement Division issues and enforces all other NPDES permits in addition to all pretreatment, subsurface disposal, stormwater, and agricultural discharge permits.

In accordance with State statutes passed in 1967, permits are required for all discharges, regardless of volume, type, or discharge location. These statutes include all discharges to surface waters, sanitary sewers, and groundwaters. There are a total of 726 individual discharge permits, of which 196 are for individual NPDES discharges (excluding general permits). The July 9, 2004, NPDES Management Report shows 109 major and 87 minor facilities with individual permits, with no minor facilities covered by non-stormwater general permits in Connecticut.

Connecticut is one of the few States in the country that also regulates all pretreated discharges directly, in lieu of requiring the affected municipalities to operate the program. However, municipal authorities often require approval and POTWs must be notified when accepting discharges from new sources. The

only types of discharges that have been delegated to other agencies for permitting are small septic system discharges with a volume less than 5,000 gallons per day.

Connecticut received EPA authorization for the NPDES program in 1973, authorization for the State pretreatment program in 1981, approval to regulate federal facilities in 1989, and approval to issue general permits in 1992.

Currently, 46.2 full-time equivalents (FTEs) are available to work on NPDES permitting and enforcement, with a budget of \$5,182,081. In addition, coordination with the permitting and enforcement staff is provided by 11.5 FTEs for purposes of aquatic toxicity, TMDLs, water quality standards criteria, and stream monitoring issues, with a budget of \$1,356,766. Current staffing levels are down approximately 25% from peak levels that occurred in the early 1990s. However, the Permitting and Enforcement Division recently filled three FTE positions.

Like many States, Connecticut is undergoing a transition as a result of early retirements and other reductions in staffing levels, and is currently undertaking an organizational evaluation to determine how best to deploy its financial and staff resources to address its public health and environmental priorities. Connecticut is likely to resolve its organizational review and implement any changes, if appropriate, during 2005.

CTDEP maintains internal training programs as necessary to ensure that all elements of the permit program are completely understood. Also, most permitting staff have attended EPA training programs for NPDES permit writers.

2. State Program Assistance

EPA Region 1:

The State of Connecticut has the authority to operate all aspects of the NPDES permit program except biosolids. The Region works with the State as needed or as requested on a case-by-case basis. For example, the Region is working with the State on 316(a) and (b) issues specific to a major power generating facility and is also providing assistance on combined sewer overflow (CSO) issues.

3. EPA Activities in Indian Country

EPA Region 1:

Connecticut has several federally recognized Tribes. To the extent necessary, the Region coordinates with the Tribes on various water program issues as they arise. However, the Tribes have no individual permits as their wastewater is discharged to and treated by local municipalities. Stormwater associated with construction activities on Tribal lands is covered by the Region's general permit. Regional outreach activities on stormwater-related issues have included coordination with the Tribes, as appropriate.

4. Legal Authorities

EPA is conducting a comprehensive review of the State's legal authorities. This review has not yet been completed. As a result, EPA is reserving this section of the profile; when the legal reviews are complete, EPA will update profiles to include the results of the reviews.

5. Public Participation

An evaluation of the State's legal authorities regarding public participation will be included in the legal authority review. As noted above, the legal authority review section of this profile is reserved pending completion of the legal authority review.

The State of Connecticut:

Connecticut's public participation process is specified in State regulations and statutes (sections 22a-6g, 22a-6h, 22a-6l, 22a-430, 22a-430b and chapter 54 of the Connecticut General Statutes; and sections 22a-3a-1 to 22a-3a-6, 22a-430-4 (g), (h), (i), and (j) of the Regulations of Connecticut State Agencies). The State statutes require that all applicants for an NPDES permit publish a notice in the local newspaper notifying the public of their submission of an application and notifying the responsible elected local official. The State meets with interested parties at the time of the public notice, if requested. Following a full review of the application, the State publishes a second notice in the local newspaper to notify the public of the proposed permit issuance or denial. State statutes also allow CTDEP to require an applicant for an NPDES permit to post a large sign on the applicant's property notifying the public of the proposed application. A 30-day comment period is provided after notice to enable the public to request a hearing. If a petition is received from 25 people or more, if the applicant contests the terms and conditions of the proposed permit, or if the Commissioner determines that a hearing is appropriate without a request, a hearing is held.

It is CTDEP policy to hold all public hearings for NPDES permits in the evening, in the town in which the discharge is proposed. In instances of controversial applications, informational meetings with town officials and the public may also be held in the affected town, in addition to the public hearing. When a public hearing is held, a more detailed fact sheet is developed to ensure a clear understanding of the permit conditions and issues.

The public has free access to notices of intent (NOIs) and other program, permit, and compliance information, and Connecticut does not have any reservations about who is considered public for participation in actions or obtaining information. State statutes define "person" as natural person, partnership, corporation, limited liability company, association, or society.

The CTDEP Web site provides useful information to the public on the hearing process, as well as copies of all public notices for NPDES permits. The Web site <http://www.dep.state.ct.us> also includes permitting and enforcement statistics, details on completed enforcement cases, strategic program plans, and numerous other sources of information for the public. Although general permits are provided on Connecticut's Web site, neither draft nor final individual NPDES permits are provided. However, the State's Web site provides links to EPA New England's Web site, <http://www.epa.gov/region1/npdes/vt.html>, and EPA's national program Web site, <http://www.epa.gov/npdes/permitdocuments>, both of which post some individual NPDES permits and fact sheets issued by Connecticut. Presently, there are two recently issued permits on the Region's Connecticut NPDES page. The Region will continue its efforts to ensure that all relevant permits are posted on its Web site, including those issued in Connecticut.

6. Permit Issuance Management Strategy

The State of Connecticut:

Connecticut makes a strong effort to comply with EPA's suggested backlog rates for NPDES permits and to keep NPDES permit renewals a priority. However, the State has a large universe of regulated discharges. In addition, other permits or program elements outside the NPDES permit renewal program may be considered a greater environmental or public health priority on a case-by-case basis. For example, all major NPDES permits for industrial facilities presently contain water quality-based limits for all appropriate toxic pollutants, as well as whole effluent toxicity (WET) limits as needed. Handling of renewal applications for these discharges, in cases where the discharge has not changed, and when the permit legally remains in effect past the expiration date, may be considered a lower priority than other program needs that would result in greater environmental benefit. In addition, a few NPDES permits are technically more complex, are very controversial, and require extensive public input, which delays their renewal processing time. Despite efforts to make backlog reduction a high priority, these situations can add to the permit backlog.

The table below tracks the percentage of facilities with current permits for the years 2000 to 2003.

Table 1: Percentage of Facilities Covered by Current Permits in Connecticut
(State-issued permits)

	2000	Nat'l Avg.	2001	Nat'l Avg.	2002	Nat'l Avg.	2003	Nat'l Avg.
Major Facilities	74%	74%	84%	6%	89%	83%	81%	84%
Minor Facilities Covered by Individual Permits	25%	69%	53%	73%	56%	79%	62%	81%
Minor Facilities Covered by Individual or General Permits	N/A	N/A	N/A	N/A	56%	85%	62%	86%

Source: PCS, 12/31/00; 12/31/01; 12/31/02; 12/31/03. (The values in the "2003" column are PCS data as of 12/31/03. The values in the National Data Sources column of the Management Report, measures #19 and #20, are PCS data as of 6/30/04.)

Over the past few years, the State's policy has been to eliminate many surface water discharges where it is practical and reasonable, particularly where the receiving stream is small. This has been accomplished by requiring complete recycle systems working particularly with industries with small cooling water discharges, or through redirection of the discharge to a sanitary sewer where possible. This is accomplished either during the application review process or through a permit condition or administrative order.

The State maintains a strong permit program by ensuring that active NPDES permits are modified during their 5-year term when new information indicates that more stringent conditions are needed to protect the receiving stream.

Connecticut has also developed 17 categories of general permits regulating discharges to the sanitary sewer and for stormwater discharges from industrial, commercial, and municipal activities. The State is developing general permits for several other categories of discharges, which will contribute to a further reduction in the permit backlog while ensuring that the discharges are appropriately managed. CTDEP has also committed to working on those permits considered to be environmentally significant. This commitment is consistent with the targets negotiated through the Performance Partnership Agreement (PPA) process. Although the State will continue to carry a backlog (particularly for minor permits) above national targets, it will work at reissuing a number of environmentally significant permits. The Region will continue its efforts to work with Connecticut to ensure that the appropriate progress is made in reducing the backlog rate consistent with Regional and national goals.

7. Data Management

The State of Connecticut:

PCS is the primary database used by Connecticut to track compliance with NPDES major permits (quarterly noncompliance report [QNCR] and significant noncompliance [SNC] reporting). In 2002, all NPDES minor permits were also entered into PCS, resulting in 100% of Connecticut's individual NPDES permits tracked through PCS. CTDEP is working with the Region to ensure that NPDES general permits are entered into PCS. The State also uses several stand-alone databases to track inspections, notices of violation (NOVs), order steps, and total quarterly enforcement actions for the permitting program, including NPDES, pretreatment, underground injection control (UIC), general permits, and implementation of the nitrogen trading program. Data from these tables are double-entered into PCS for NPDES permit-related actions, rather than entered through a shared database. Also, the State has completed entering all pretreatment significant industrial users (SIUs) data into PCS, to replace an existing State COBOL program now used for enforcement tracking of these permits.

The State has made an effort to clean up PCS over the past 3 years with help from EPA Region 1 to ensure accurate reporting for EPA's Enforcement and Compliance History Online (ECHO) public Web site. This clean-up effort involved a review of Water Enforcement National Database (WENDB) data as well as historical Order and SNC reports. All discharge monitoring report (DMR) data entered into PCS is double-checked to minimize recording errors. In addition, permittees are sometimes contacted to provide additional assurances of data accuracy. Specific DMR forms for each NPDES discharger are produced by the State and provided to the permittees for their use to ensure both that the DMR accurately reflects the permit and that data are provided in an acceptable format.

Violation reports are generated for staff review, and enforcement initiatives may be taken against nonreporting or late-reporting permittees. All WET DMR data submitted by permittees are reviewed separately by staff dedicated to the toxicity program. Stormwater monitoring data for the approximately 1,200 facilities performing annual stormwater sampling (11 pollutant parameters and aquatic toxicity) are maintained by Planning Division staff in a database dating to 1996. Monthly operating reports (MORs) for municipal facilities (i.e., POTWs) are also submitted to CTDEP for review. MORs are required to include documentation of any operational problems or violations. Violations are quickly brought to the attention of permitting and enforcement staff. The State maintains records of all latitude/longitude data for NPDES discharges including outfall pipe locations, and has field-verified such data for all major NPDES discharges. The latitude/longitude data contained in PCS for Connecticut's facilities are dated. CTDEP has developed a mapping tool that can be used to determine a facility's latitude/longitude. The Region has requested that CTDEP place additional emphasis on

ensuring that pipe level latitude/longitude data that are included in NPDES permit applications are accurate and are entered into PCS.

Microsoft Access databases are used to track sanitary sewer overflow (SSO) reports as well as stormwater NOIs filed under CTDEP's general stormwater permits. There are no comparable reporting requirements for CSO reporting in Connecticut's NPDES permits. Connecticut's data systems and PCS are used to track CSO permit and enforcement order schedules.

Section II. Program Implementation

1. Permit Quality

The State of Connecticut:

The CTDEP permitting staff are well trained and very experienced in the program. Internal training programs are maintained as necessary to ensure that all elements of the permit program are completely understood. All permit processing staff are trained in wastewater generation processes, collection and treatment systems, water quality considerations including water quality standards and criteria, toxicity programs, spill control, water conservation, pollution prevention opportunities, and State and federal regulatory requirements. Most permitting staff have attended EPA training programs for NPDES permit writers. Field visits are required during the processing of an application.

Standardized technical review checklists are used, standardized computer-generated water quality analyses are performed, and draft permits and fact sheets are reviewed by supervisors, the field monitoring staff, the DMR processing staff, the toxicity staff, and management prior to their release for public notice. Stormwater monitoring results are available for all facilities and are reviewed as part of the overall permit renewal process. Permitting staff members also perform enforcement duties, providing them with broad experience and exposure to potential problem areas and common causes of permit noncompliance. Copies of all draft NPDES permits are sent to EPA for comment. Basic fact sheets are prepared for each proposed permit, and a more detailed fact sheet is prepared in the few cases where a public hearing is held.

The State has maintained a WET program for many years (one of the first in the nation), and modified its permit regulations in 1987 to incorporate requirements for discharge toxicity evaluations by permit applicants, for effluent testing by permittees, and for the establishment of WET discharge limitations. Acute and chronic WET limitations and monitoring requirements are incorporated into NPDES permits as needed, in addition to chemical limitations. CTDEP has worked closely with the regulated community to keep them informed of these requirements and to assist them in identifying and reducing sources of waste stream toxicity. The State also maintains its own toxicity laboratory, performs testing of NPDES discharges, and reviews all WET data submitted in DMRs.

CTDEP adheres to quality assurance/quality control (QA/QC) procedures for water quality monitoring and data analysis to help ensure that data used in the development of effluent limits are representative and of high quality. All ambient water quality data collected by the State are collected in accordance with QA/QC protocols that are intended to ensure the collection of high quality data. Data on receiving water quality and assessment status (listing on the list of impaired water bodies prepared under Clean Water Act section 303(d) are also available to all permit staff through the Planning Division and are considered when permits are reviewed.

EPA Region 1:

During the past few years, the Region has reviewed relatively few permits drafted by CTDEP because of resource limitations and the Region's focus to reduce the EPA permit backlog universe. In general, the Region has targeted permit reviews based on whether there is significant public interest in the permit or if the permit is related to other EPA actions (i.e., TMDL approvals). The permits reviewed by the

Region during the past few years were either “high profile” permits (e.g., Hartford CSO permit) or associated with TMDLs that were under review by the Region. As a result of permit these reviews, the Region has had ongoing discussions with CTDEP concerning the limited amount of information provided in the basic fact sheets developed by CTDEP. Recently, CTDEP has provided more information in their fact sheets; however, the Region believes this is still an area for future enhancement.

The regional NPDES program has recently acquired one FTE that will be devoted to improving program oversight, including conducting reviews of permits issued by authorized States. The Region plans to strengthen its overview of delegated NPDES programs beginning in 2005. This will include targeted reviews of Connecticut’s permits as well as those of the other delegated States in the Region.

As part of the national permit quality review performed in 2000/2001 by EPA Headquarters, EPA Region 1 provided permits for four municipal and four industrial facilities in Connecticut. The review identified potential areas for enhancement related to general or standard permit conditions and the amount of information presented in fact sheets. In general, the permits reviewed for municipal facilities appeared to contain required limits and conditions, but the fact sheets rarely included sufficient information to evaluate the development of effluent limitations. The fact sheets for industrial facilities were somewhat more detailed than those for municipal facilities, but they did not generally provide the detail necessary to justify final permit limits and conditions. However, this information is readily available from other, easily accessible sources.

The review findings were transmitted to the Region and CTDEP in November 2002. Regional staff subsequently met with CTDEP to discuss the findings. The Region has noted improvement in this area. As part of its plans to enhance program oversight starting in 2005, the Region will work with Connecticut to resolve any outstanding issues identified by either the Headquarters’ review or future reviews conducted by the Region.

2. Pretreatment

The State of Connecticut:

On June 3, 1981, Connecticut received authorization to administer the pretreatment program. Connecticut is one of only five states that issues permits directly to the SIUs, instead of delegating that activity to the POTW level. CTDEP, therefore, manages the pretreatment program as the control authority, issuing pretreatment permits to all pretreatment industries, and initiating most enforcement actions. There are 221 SIUs that have control mechanisms.¹

The State works closely with POTW operators to identify problem discharges to the POTW’s collection systems and frequently performs townwide field surveys to attempt to locate any unpermitted discharges to the POTW. The State has issued or is planning to issue several general permits to cover other

¹ Management Report measures #9 and #24 (number of SIUs and percentage of SIUs with control mechanisms) list “-” for the Connecticut State activity in the National Data Sources columns. Connecticut regulates SIUs directly under 40 Code of Federal Regulations (CFR) 403.10(e) and there are therefore no approved pretreatment programs at POTWs. By definition, the National Data Sources columns on the Management Report capture only SIUs discharging to POTWs with approved pretreatment programs. The number of permits issued to SIUs by the State is reflected in the Additional Data column on the Management Report. Connecticut has completed the process of entering all 221 identified pretreatment SIUs into PCS from its existing COBOL program.

discharges to sanitary sewers that do not have promulgated federal pretreatment standards, such as controlling grease from restaurants and other food establishments and preventing subsequent SSOs and other adverse effects on the receiving POTWs. The State periodically reviews State business records through the Department of Labor and other information sources to ensure that new or previously unknown discharges are properly regulated. The State works closely with the Connecticut Business and Industry Association (CBIA), the Connecticut Association of Metal Finishers (CAMF), and other trade groups to inform the business community of new requirements and problem areas.

EPA Region 1:

EPA serves as the approval authority and is responsible for conducting the audit of Connecticut's pretreatment program. The Region also initiates some pretreatment enforcement actions related to categorical dischargers in coordination with the State. This workload is managed by the same staff that manage the NPDES permit program.

3. Concentrated Animal Feeding Operations

The State of Connecticut:

CTDEP has authority to regulate all agricultural facilities for water pollution problems and has been doing so for years. A concerted effort has been made to work cooperatively with farmers and others in the agricultural community over the last 30 years to address water pollution problems and proper management of farm wastes. This program includes site inspections and review and approval of waste management plans. The waste management plans are consistent with the standards set for comprehensive nutrient management plans (CNMPs), with the possible exception of the setback distance from water bodies. However, CTDEP is examining this potential difference. Formal enforcement actions have also been taken in rare instances of uncooperative farm operators or for instances of gross pollution. Past efforts to address pollution from agricultural operations in Connecticut have mainly been done using CTDEP's non-NPDES authorities.

Connecticut has the legal authority to issue NPDES concentrated animal feeding operation (CAFO) permits, and CTDEP has been working with the agricultural community to develop a general permit for CAFOs. CTDEP committed in its PPA to complete 50 farm inspections and 15 farm waste management plans. In addition, CTDEP has committed to work with the Department of Agriculture in developing an implementation plan (including funding opportunities) for the CAFO general permit. There are only nine animal feeding operations (AFOs) in the State that will be automatically classified as CAFOs requiring permits, based solely on the number of animals. CTDEP has performed site visits and is familiar with all nine facilities that will qualify as CAFOs. There are approximately 50 small to medium-sized operations whose CAFO status will be determined by the State and may be required to be covered by NPDES CAFO permits. CTDEP's initial efforts include cooperation with the Department of Agriculture staff to ensure that the nine eligible CAFOs are appropriately permitted.

A draft general permit has been developed and distributed, and several meetings have been held with other government agencies and those CAFOs/AFOs that would be covered by the proposed general permit. This permit is under review while issues related mainly to financial assistance for those affected are explored. The State is trying to identify sources of additional funding to help permittees fulfill the requirements of the permit without causing them financial hardship that might drive them out of business. A study by CTDEP (partially funded by EPA's section 319 [nonpoint source] program) showed that this was a potential outcome of permit issuance where other assistance was not available,

and is likely for some of the operations. Connecticut plans to issue the final general permit by Fall of 2005.

EPA Region 1:

The Region is working closely with CTDEP to track permit development progress and to ensure that CTDEP's CAFO permit is consistent with the new CAFO regulations. Connecticut is developing technical standards that will conform to the revised CAFO regulations and that are expected to be in place when the final general permit is issued.

4. Stormwater

The State of Connecticut:

Connecticut has a very active program for regulating and improving stormwater quality and has been involved in formal enforcement of stormwater problems for 30 years. The State issued Phase I general permits for stormwater from industrial activities and for stormwater from large construction activities in October 1992, in compliance with federal requirements. Subsequent renewals of these general permits have strengthened them.

Of particular note in the industrial general permit is the inclusion of annual stormwater runoff monitoring requirements, including sampling for toxic pollutants, nutrients, and aquatic toxicity. These data are compiled in an electronic database and used to support program management. It also includes mechanisms to trigger a requirement that permittees make site modifications to improve runoff quality. Some specific pollution prevention strategies have been mandated as permit conditions. Stormwater pollution prevention plans are reviewed, compliance assistance is provided, and changes to the plans are required as needed. Enforcement actions are initiated based on failure to submit monitoring data, as well as failure to address poor surface water quality in updating stormwater pollution prevention plans.

The State has also been very active in regulating construction sites with formal enforcement actions and penalties. Stormwater pollution control plans for most large construction sites are reviewed, and staff work closely with permittees at the site to ensure compliance. The Phase I municipal separate sewer system (MS4) permit for the one municipality covered by that phase has not yet been issued. However, CTDEP has prepared a draft permit and plans to issue a public notice announcing the availability of the draft for public review and comment by the end of the calendar year 2004. The Phase II MS4 permit was issued on January 9, 2004, and the Phase II construction permit was issued on April 8, 2004.

The State has gone beyond federal requirements through the issuance of a general permit for stormwater from commercial activities. That permit regulates the stormwater runoff from large commercial activities such as malls and large department stores. It also requires the development and implementation of a stormwater pollution prevention plan for these sites.

CTDEP maintains an ACCESS database that tracks the submission of NOIs filed for coverage under various CTDEP stormwater general permits.

5. Combined Sewer Overflows/Sanitary Sewer Overflows

The State of Connecticut:

As a result of extensive sewerage system upgrades over the last 35 years, only four municipalities now need long-term control plans (LTCPs) for their existing CSOs and SSOs. New Haven's LTCP has been approved. Bridgeport's LTCP for two POTWs has been submitted and is under review. Hartford is working under a consent order to develop an LTCP but has not yet submitted a final plan for approval. Norwich has not yet been issued a revised permit or a consent order to address its CSO issues, which is due by the end of calendar year 2004. In total, there are five permits that address active CSOs in four communities in Connecticut.² Two additional municipalities (Norwalk and Waterbury) have been permitted to allow one CSO to remain at the POTW, with the requirement that primary treatment and disinfection be provided for any discharge. Both CSO treatment systems for these POTWs are operational. LTCPs are not required for these two municipalities. In practice, the remaining Waterbury CSO had not been activated, except for one occasion in 2001, since the city installed the main interceptor relief sewer, which eliminated all the CSOs in the city's collection system except for the CSO prior to the treatment plant. Elimination of the CSOs has decreased flows to the wastewater treatment plant as the CSOs at times were sources of inflow rather than points of discharge.

The State's policy is to require municipalities, as a condition of their NPDES permit, to report all SSOs to their local Health Departments. The POTW is also required to report all SSOs to CTDEP and to provide information on the volume, locations, cause, and corrective actions taken to prevent future occurrences. Connecticut's standardized SSO reporting forms require that local health departments and health departments of contiguous (coastal) or downstream (inland) communities be notified in case of an SSO event, and rely on the health departments to assess the threats to human health and the environment, at which time the public would be notified. During its review of emergency response plans required by several federal judicial SSO consent decrees, the Region has required specific communities to establish public notification systems for SSOs. Similarly, health departments notify the public of the health impacts associated with discharges from CSOs that occur during precipitation events.

Because of reporting limitations, it is difficult to assess CSO reporting trends in Connecticut; however, as the universe of communities that have eliminated or reduced CSOs increases and the number of LTCPs being implemented by CSO communities increases, the number of CSO events can be expected to decrease.

Year-to-year SSO reporting trends are difficult to assess because of differences in hydraulic conditions from year to year. A general assessment is that SSO reporting in Connecticut is relatively flat. The number of SSOs reported by communities that have been subject to EPA/CTDEP enforcement actions has decreased as remedies have been implemented; however, more communities are now reporting SSOs to CTDEP than have reported in the past.

² See Management Report measure # 10.

6. Biosolids

The State of Connecticut:

Connecticut is not authorized to administer the federal biosolids program. Connecticut relies almost entirely on incineration to reduce the volume of municipal sewage sludge. Only two municipalities (Fairfield and Farmington) are using composting operations for disposal. Both operations are located at the respective POTWs. The current NPDES permits issued to these two towns contain specific maintenance and control requirements for the composting operations, including appropriate record keeping. Also, the composting operations are included as part of the review of both POTW facilities during site inspections. The incinerators and composting facilities are regulated as a unit operation of POTW facilities and are also permitted and regulated by CTDEP's Bureau of Air Management. PCS tracks annual reporting.

Section III. NPDES Compliance Monitoring and Enforcement Response

In a separate initiative, EPA's Office of Enforcement and Compliance Assurance (OECA), EPA Regions, and the Environmental Council of the States have developed a tool for assessing State performance in enforcement and compliance assurance to ensure that States meet agreed-upon minimum performance levels and provide a consistent level of environmental and public health protection nationwide. OECA will use the State profiles to focus these efforts and identify areas needing further discussion and evaluation.

1. Enforcement Program

The State of Connecticut:

The State uses its formal Enforcement Response Policy and its Civil Penalty Policy for all enforcement actions. The State has also developed a Policy for Supplemental Environmental Projects to assist the staff and the regulated community in addressing this important component of many enforcement actions. These policies are contained in the State's Web site and provide detailed guidance for developing cases and calculating specific penalties. All proposed enforcement actions are accompanied by fact sheets to support compliance with the above policies. These are useful for management review.

Permitting and enforcement field staff address DMR and other noncompliance issues during site inspections. Permits staff may contact permittees when they become aware of significant DMR violations or other significant noncompliance to provide assistance and ensure prompt compliance efforts.

In a continuing first-of-its-kind program in New England, Connecticut began a program in 1994 under which the CTDEP water pollution enforcement staff meet monthly with representatives of EPA and the State Attorney General's Office to discuss noncompliance issues, specific violations, and potential enforcement cases. Criminal law enforcement agencies may also attend these meetings. Consensus decisions are made for each case and specific responsibilities for enforcement cases are assigned and tracked in subsequent monthly meetings. This helps to ensure a timely, coordinated response to violations.

The SNC rate for NPDES major facilities in Connecticut is below the national average. Facilities sometimes remain in SNC for extended periods because CTDEP typically pursues administrative enforcement in the form of a consent order, which involves a negotiation process, particularly if a civil penalty is being assessed for any violations. In recent years, CTDEP has focused on nontraditional areas including violations of the State's stormwater and other general permit requirements. CTDEP has a history of seeking significant penalties against industrial dischargers.

The State maintains a computerized Microsoft Access database tracking system for all formal enforcement cases. Compliance data were previously tracked in its predecessor database—Order Update. CTDEP is transferring this information into PCS. Each month enforcement action schedules are reviewed to determine their compliance status. Engineering reports, plans, and specifications of treatment systems and other required submissions are received and must be approved by the State before

upgrades or modifications are made by the order recipient. Written verifications and testing results are reviewed, and site visits are made as necessary to verify compliance.

2. Record Keeping and Reporting

The State of Connecticut:

Records of all individual and general permit holders are maintained in computer databases. Up-to-date paper records are maintained for all individual permits and for all formal enforcement actions, including supporting rationales for each permit and action taken. For all completed enforcement consent orders, a written explanation is documented for any penalty reduction agreed to in settling the case. EPA is kept informed of the status of all enforcement actions by attending the monthly enforcement meetings, and is provided with permit violation data through PCS.

3. Inspections

The State of Connecticut:

Every year since NPDES authorization was received, the State has generally been able to inspect and collect effluent samples from all major NPDES permittees at least once a year. These inspections are unannounced. When violations are found, follow-up inspections are sometimes necessary. However, because of staff constraints and other responsibilities, including inspection of pretreated discharges, and complaint investigations, an annual inspection has not always been accomplished. A portion of all minor NPDES permittees are also inspected each year. In some years, a risk-based system has been used to target inspection efforts on priority facilities. An annual inspection was not performed if certain criteria were met, such as the permittee's good historical performance record, DMRs showing compliance with limits, and the inspection staff's knowledge of the facility and the permittee.

The State has generally complied with all annual EPA inspection commitments, CTDEP has actively participated in EPA's statistically based inspection programs. The State attempts to base its inspection activities on the highest environmental priorities at the time. These priorities change regularly as new complaints are received, as formal enforcement cases are developed, and as noncompliance issues at permitted facilities are prioritized. Connecticut has deviated from the annual inspection commitment of inspecting 100% of NPDES major facilities and 80% of the industrial user universe to focus on those areas that were likely to have a greater potential for causing pollution. In lieu of inspecting certain facilities with good compliance records that met specific performance criteria, CTDEP refocused a portion of its inspection resources on facilities known or suspected to have problematic stormwater discharges to critical watersheds, construction sites known to be the sources of stormwater pollution, agricultural sites known to have potential runoff problems, and facilities with poor compliance records.

The State has established watershed districts for most permitting, enforcement, and inspection activities, resulting in good staff knowledge of most discharges and potential problem areas in each watershed, as well as more coordinated and effective problem-solving. Recent efforts have particularly focused on stormwater inspections for construction and commercial activities. Many stormwater runoff problems, particularly at construction sites, have become higher priorities than even many major NPDES discharges because of obvious severe environmental harm. The State maintains a flexible rationale for inspections so that it can focus available resources on the greatest environmental needs.

4. Compliance Assistance

The State of Connecticut:

The State provides compliance assistance in many forms including one-on-one meetings, public presentations to trade groups and other stakeholders, and the CTDEP Web site in the section on “Managing Environmental Compliance in Connecticut.” (See <http://www.dep.state.ct.us>.) Fact sheets are prepared for certain subjects and businesses, and application packages contain helpful outreach materials. Pollution prevention efforts occur in the permit application review stage for most industrial and commercial activities, and special pollution prevention efforts are made statewide when a particular pollutant is targeted for reduction as proposed in the State’s Pollution Prevention Plan finalized in 1996.

During the permit application review process, great effort is made to help applicants understand the processes and activities that generate wastewater and to suggest to or require applicants to make reasonable changes to reduce the wastewater volumes as well as the use of toxic pollutants. When NPDES permits are issued for new discharges or where substantial modifications are made during renewals, engineering and field staff often meet with the permittee at the site to provide compliance assistance information. Outreach efforts to various types of business groups are common to inform them of permitting and technical requirements. General permits are developed using advisory groups composed of representatives from the various types of businesses that will be covered by the general permit. State statutes have been modified to prohibit the use and sale of certain toxic pollutant products. Some permits are issued with steps requiring the study and implementation of specific pollution prevention measures.

Most efforts are tracked and reported as a special project. Sometimes the results are then shared with the regulated community through outreach materials. As one example, the State has performed several detailed audits of general permit categories to ensure that registrations are properly filed, review discharge monitoring results, obtain additional compliance information, calculate compliance rates, and provide follow-up assistance in the form of audit results and common violations to avoid.

Section IV. Related Water Programs and Environmental Outcomes

1. Monitoring

The State of Connecticut:

Ambient water quality monitoring in Connecticut has historically employed a focused approach targeting major rivers and waste; receiving waters; consequently, many smaller streams remained unassessed. In an effort to prioritize surface water monitoring activities and increase monitoring coverage, a 5-year rotating basin monitoring strategy was developed and implemented in 1997 following existing CWA section 106 (State grants) and section 305(b) (water quality inventory) guidance.

One major drainage basin was targeted each year during the 5-year cycle, which ended in 2001. In addition, an increased effort was made to incorporate data from volunteers, academics, and municipalities. At the completion of the full basin rotation in 2001 and as reported in Connecticut's 2002 305(b) report, the number of assessed stream miles increased from 893 (15%) in 1996 to 1,461 (27%) for aquatic life use and 1,197 (22%) for contact recreation. Despite these gains, this type of focused monitoring cannot be extrapolated to meet the federal CWA requirement to assess all navigable waters of the State.

Connecticut has been an active participant in the New England Wadeable Streams (NEWS) study and will be participating in the upcoming New England Lakes Study. Both of these studies are collaborations with the regional EPA field office, featuring regionwide and individual statewide randomized designs. Connecticut is expected to continue to participate in randomized design studies when funding is available above and beyond their own needs for TMDL and targeted monitoring projects.

The NEWS study was conducted during 2002 and 2003 and assessed wadeable streams based on a statewide probabilistic design. Sample coverage included biological monitoring of fish, invertebrate and periphyton communities, and quarterly water chemistry at 60 sites. Data from probabilistic surveys provide a statistically representative sample that can be extrapolated to characterize water quality conditions of all wadeable streams in the State. Also, during 2002-2003, in addition to probabilistic sites, CTDEP conducted monitoring at reference sites, sites with known problems, and intensive surveys prior to or following TMDL implementation.

The monitoring program has made significant progress since adopting the rotating basin strategy in 1997, as indicated by the following milestones:

- Hired two full-time monitoring program staff members—a volunteer monitoring coordinator/data manager/biologist and a dedicated Section 305(b) position
- Updated equipment for monitoring field parameters

- Implemented electronic data management linked to the geographic information system (GIS) for all data
- Began migration of monitoring data to EPA STORET
- Institutionalized a tiered, quality-assured volunteer monitoring program
- Completed a statewide probabilistic survey of wadeable streams
- Incorporated fish and periphyton community data into the monitoring and assessment program
- Completed 305(b)/303(d) reporting commitments on schedule since 1998

Connecticut is developing a comprehensive monitoring and assessment strategy based upon the 10 elements in “Elements of a State Water Quality Monitoring and Assessment Program.” The final strategy is expected by 2005 and will cover a 10-year period. It will include elements of the previous rotating basin strategy, as well as a probabilistic component that will likely increase the number of State waters assessed and enhance the understanding and characterization of surface water quality throughout Connecticut.

Connecticut relies on all readily available water quality-related information of sufficient quality for performing water body assessments and as part of its evaluation of whether a permitted discharge requires water quality-based effluent limits (WQBELs). However, background calculations are not routinely conducted for permit issuance unless the permit is based on a wasteload allocation (WLA) from a TMDL. Most of the remaining water quality-limited water body segments in Connecticut that involve permitted continuous dischargers will be the subject of TMDL analyses. For such analyses, sufficient data are and will be collected to support calibration of water quality models and development of WLAs and WQBELs.

2. Environmental Outcomes

The State of Connecticut:

Connecticut made significant progress in increasing the number of assessed stream miles between 1996 and 2002, following implementation and completion of the rotating basin strategy for monitoring (see table below). The 1998 and 2000 305(b) reports were abbreviated reports and included assessment information for the basins monitored during those cycles. The incremental gain in assessed miles between 2004 and 1996 is due to the addition of 95 new stream miles. For the 1,556 miles assessed in 2004, 796 miles were actually “holdover assessments” from 2002 (i.e., no new data).

There were striking improvements in the quality of Connecticut waters in the years immediately following passage of the Connecticut Water Pollution Control Act in 1967. Since the 1980s, however, the water quality of assessed waters has improved at a slower rate. This is due in part to the fact that the most egregious problems were corrected in the years immediately following passage of the Act. Such remarkable improvements have not been observed in the last decade owing to the difficulty and expense of solving the remaining problems and of reversing the effects of poor land-use practices (e.g., controlling non-point sources, upgrading treatment plants for nutrient removal, eliminating the remaining CSOs). Also, the incremental improvements required to meet water quality standards may be

more difficult to measure. While these issues are being addressed, the progress is incremental rather than dramatic.

Recent changes in the percentage of waters fully supporting designated uses are also affected by changes in assessment coverage and methodology. For example, in 2002, the 303(d) list of impaired waters was fully integrated into the 305(b) assessment process. This added a number of impaired waters to overall assessments. Data collection has increased not only in geographic coverage but also in the type of monitoring. In 1996, at the beginning of the rotating basin schedule, CTDEP began collecting quarterly chemistry and bacteria samples during routine monitoring, in addition to doing biological assessments. This greatly augmented the historic chemistry/bacteria coverage provided by the U.S. Geologic Survey (USGS) at approximately 30 fixed sites throughout the State. Also, the State has increased its use of data provided by volunteers, academics, and municipalities in recent years in the assessment process, thus enhancing its database.

Table 2: Use Support in Connecticut Waters between 1996 and 2004

Use	1996 Assessed	1996 % Full Support	2002 Assessed	2002 % Full Support	2004 Assessed	2004 % Full Support ^a
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Rivers (numbers are in miles)

Aquatic Life Support	893	74.8%	1,461	76.8%	1,556	76.3%
Primary Contact (Recreation)	893	73.2%	1,197	65.8%	1,338	69.1%

Freshwater Lakes (numbers are in acres)

Aquatic Life Support	27,108	96.5%	27,515	96.2%	27,650	96.3%
Primary Contact (Recreation)	27,108	99.1%	25,805	94.5%	25,997	84.0%

Estuaries (numbers are in square miles)

Aquatic Life Support	612	60.1%	613	61.3%	613	60.6%
Shellfishing	612	47%	387	53.2%	378	50.4%
Primary Contact (Recreation)	612	69.7%	609	93.7%	610	95.8%

^a CTDEP considers threatened waters to be a subset of fully supporting waters because these waters do meet WQSs. This percentage includes waters assessed as fully supporting and fully supporting but threatened.

Although Connecticut has a rotating basin schedule for conducting water quality monitoring, the State establishes priorities for TMDL development within the biannual CWA section 303(d) listing process. Assessment of impaired waters relies heavily on data generated through a well-established biological monitoring program. Physical/chemical and bacteriological water quality data are also considered in making assessments. In addition to completing TMDLs for targeted waters, the State focuses significant monitoring resources on identifying the causes of impairment in waters with impaired biological communities where no pollutant cause has been identified. The State places high value on implementation of TMDLs once established. Progress of both TMDLs in development and TMDL implementation is tracked using a Microsoft Access database that includes a roster of participants, water body information, ambient monitoring data, facility monitoring data, and the status of best management practices in meeting TMDL goals.

3. Water Quality Standards

The State of Connecticut:

Applicable State regulations require that NPDES permits include such conditions as necessary to comply with State water quality standards. All applications for NPDES permits undergo a reasonable potential determination and receive a rigorous analysis for potential water quality effects of the effluent on the receiving stream. Permit staff members analyze all applications through a computer analysis developed by the State using effluent data and receiving water body characteristics to determine whether WQBELs for specific pollutants are necessary and, in the case of existing discharges, whether compliance schedules for pollutant reductions are necessary. For any proposed new discharge, an applicant must pass this analysis prior to the issuance of a permit. All draft NPDES permits are further reviewed by staff dedicated to the aquatic toxicity program before the proposed permit proceeds to public notice, to ensure that the permit conditions will fully protect the receiving stream. The permitting staff coordinates with the planning division on specific interpretations of the water quality standards when questions arise.

Connecticut follows the same permitting approach for discharges to impaired streams where a TMDL is not available. Connecticut conducts a reasonable potential determination and establishes permit limits that would prevent the facility from causing or contributing to water quality standards violations. In cases where a TMDL study is under way and it is likely that dischargers will require new or revised WQBELs but there is insufficient information at the time of permit issuance to establish appropriate WQBELs, a reopener clause would be added to the permit and the dischargers would be required to conduct facility planning to evaluate treatment options to reduce pollutant loadings to various levels. In many cases, interim WQBELs would also be established using available information, with the possibility that the WQBELs would be revised upon approval of the TMDL.

State water quality standards prohibit the discharge of industrial or sewage effluent to surface waters designated Class A or AA or potential future potable water supplies. Connecticut is one of only two States that have this prohibition. Large septic systems permitted in accordance with the UIC program and State requirements are very carefully regulated in drinking water supply areas. State statutes provide strong enforcement mechanisms for potential pollution sources, including stormwater and nonpoint sources, in public drinking water supply watersheds.

Connecticut completed its triennial review of the State's water quality standards in December 2002. Connecticut's comprehensive permit review process and the close coordination between the Planning

Division, which is responsible for water quality standards revisions, and permitting staff ensure that permits are consistent with current water quality standards. Presently, narrative criteria for nutrients are being implemented on a watershed-by-watershed basis as part of TMDL development and implementation. Significant progress has been made in reducing nitrogen loads to Long Island Sound through the statewide Nitrogen Trading Program for 79 POTWs covered by a nitrogen general permit. Progress in implementing Connecticut's narrative nutrient criteria for phosphorus has been slower, primarily due to a major nonpoint source component that is not subject to direct regulation by CTDEP. Indicator bacteria standards may become difficult to implement in situations involving wet-weather sources or naturally occurring sources.

To protect human health from recreational activities, the State has adopted E. coli criteria for fresh waters and enterococci criteria for marine waters that are consistent with EPA's recommended criteria. Connecticut does not have numeric nutrient criteria, but the State is in the process of collecting information to develop appropriate numeric loading rates for nutrients in specific water bodies as part of TMDL development efforts to address eutrophication impairments. Also, the Region is currently reviewing a plan prepared by CTDEP for developing and adopting nutrient criteria. Adoption of numeric criteria will greatly facilitate the issuance of permits to nutrient-impaired waters, provided a strong scientific linkage can be established between attainment of the criteria and protection of designated uses. Connecticut has provisions for considering use attainability analyses (UAAs) for modifying water quality standards and changing use designations.

4. Total Maximum Daily Loads

The State of Connecticut:

The TMDL program is fully integrated with the NPDES program. When a final TMDL has been developed for a receiving stream where there are existing NPDES permitted discharges, any requirements for upgrades or elimination of those discharges are specified in the TMDL. Connecticut's TMDLs include sufficient information to support development of WQBELs. Specific requirements are then incorporated into the renewed or modified permit(s) or, if permit renewal is not imminent, an administrative order with a schedule is issued to the permittee to take the necessary steps to comply. Connecticut has used an innovative and comprehensive general permit to implement the nitrogen TMDL for Long Island Sound. However, CTDEP has yet to address stormwater general permit implementation respective to established TMDLs because most of the recent final TMDLs established by CTDEP have involved impairments caused primarily by individually permitted continuous sources that affect surface water quality under low flow, non-stormwater runoff conditions. CTDEP's small community MS4 general permit includes requirements that stormwater management plans be consistent with established TMDL WLAs.

Overall, Connecticut has a balanced TMDL program that addresses a variety of water quality problems. TMDL priorities include (complex) point source-dominated TMDLs, nonpoint source (NPS) lake TMDLs, and NPS/stormwater stream TMDLs. TMDLs have been developed for several different pollutants including ammonia, heavy metals, chlorine, propylene and ethylene glycol, total nitrogen, phosphorus, and indicator bacteria. TMDLs have addressed impairments dominated by both point (wasteload) and nonpoint (load) allocations as well as waters where both point and nonpoint pollutant sources required load reductions to achieve water quality standards.

Connecticut's most significant TMDL has been the TMDL for Long Island Sound (LIS) that established individual WLAs for 79 municipal sewage treatment facilities and included provisions to fully implement those allocations through a nitrogen credit exchange (trading) program over a 14-year period. This program is highly innovative and is a national model of success. The initial review of trading activity indicates that the program is working quite successfully and has resulted in significant reductions in nitrogen discharges to LIS.

Connecticut's pace of developing TMDLs has been low due primarily to resource constraints and complexities associated with water quality impairments. One of the most significant impediments to sustaining a more rapid pace in TMDL development is the complexity associated with establishing scientifically sound linkages between observed impairments and the specific pollutants contributing to the impairment. Nonpollutant stressors such as degraded habitat and altered hydrology are significant influences on the ability of many impaired waters to sustain healthy biological communities. Developing TMDLs for water bodies impaired principally by stormwater or other intermittent sources of pollutants, the majority of impairments in Connecticut, is also more technically challenging than traditional analyses involving continuous point source discharges.

EPA Region 1:

EPA Region 1 is expending considerable effort to help the New England States accelerate the pace of TMDL development. Over the past few years, Connecticut has received competitive funding from the Region for TMDL projects. To date, EPA has approved 41 TMDLs submitted by Connecticut and is currently reviewing several others that have recently been submitted. As indicated in the Management Report,³ the Region had approved 37 TMDLs by September 30, 2003, out of a TMDL universe of 380.⁴

Although Connecticut's pace of TMDL development appears slow, the Region is working closely with the State on a number of things to improve the situation. First, pursuant to the 2004/2005 PPA, CTDEP hired two new staff people to work on TMDLs and water quality issues. This will help Connecticut improve its TMDL development pace. Second, Connecticut is actively participating in the Regional TMDL innovations project. The TMDL innovations project involves the assessment of a variety of potential approaches for developing TMDLs for waters impaired by stormwater, with a goal of developing an approach that would allow States to complete stormwater-related TMDLs in a timely manner. Furthermore, the State has developed a new methodology to bundle bacteria TMDLs.

5. Safe Drinking Water Act

The State of Connecticut:

Connecticut's drinking water program is run by the Connecticut Department of Public Health (DPH). There is little interaction between the drinking water program and CTDEP's NPDES program because the State has laws that prohibit discharges to surface waters that are used as drinking water sources. For example, rivers are not used as drinking water sources and discharges are not allowed to surface water reservoirs.

³ See Management Report measure #54.

⁴ See Management Report measure #41.

The DPH and CTDEP interact primarily in two areas, the Source Water Assessment Program and the State Revolving Loan Fund Program.

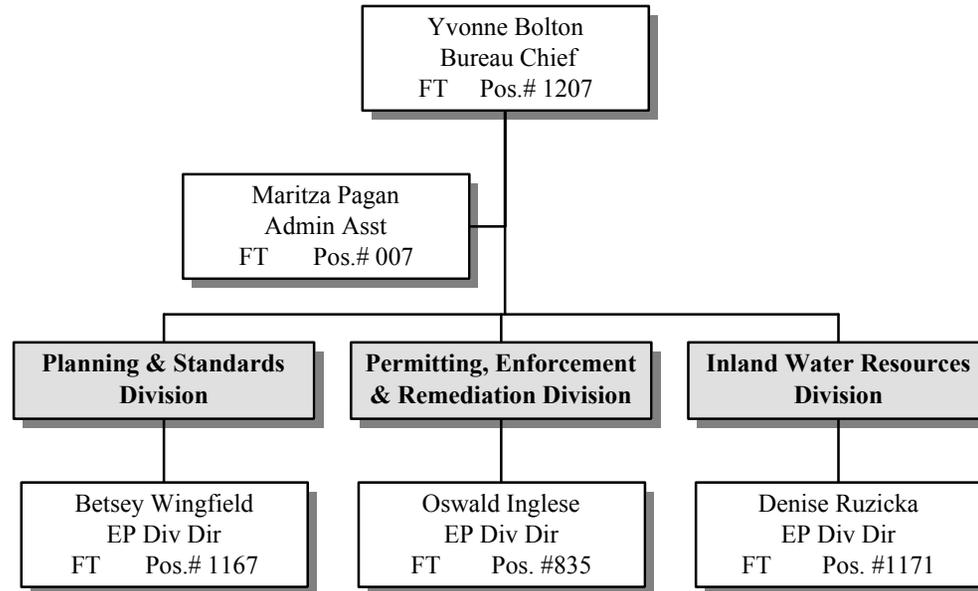
Section V. Other Program Highlights

The State of Connecticut:

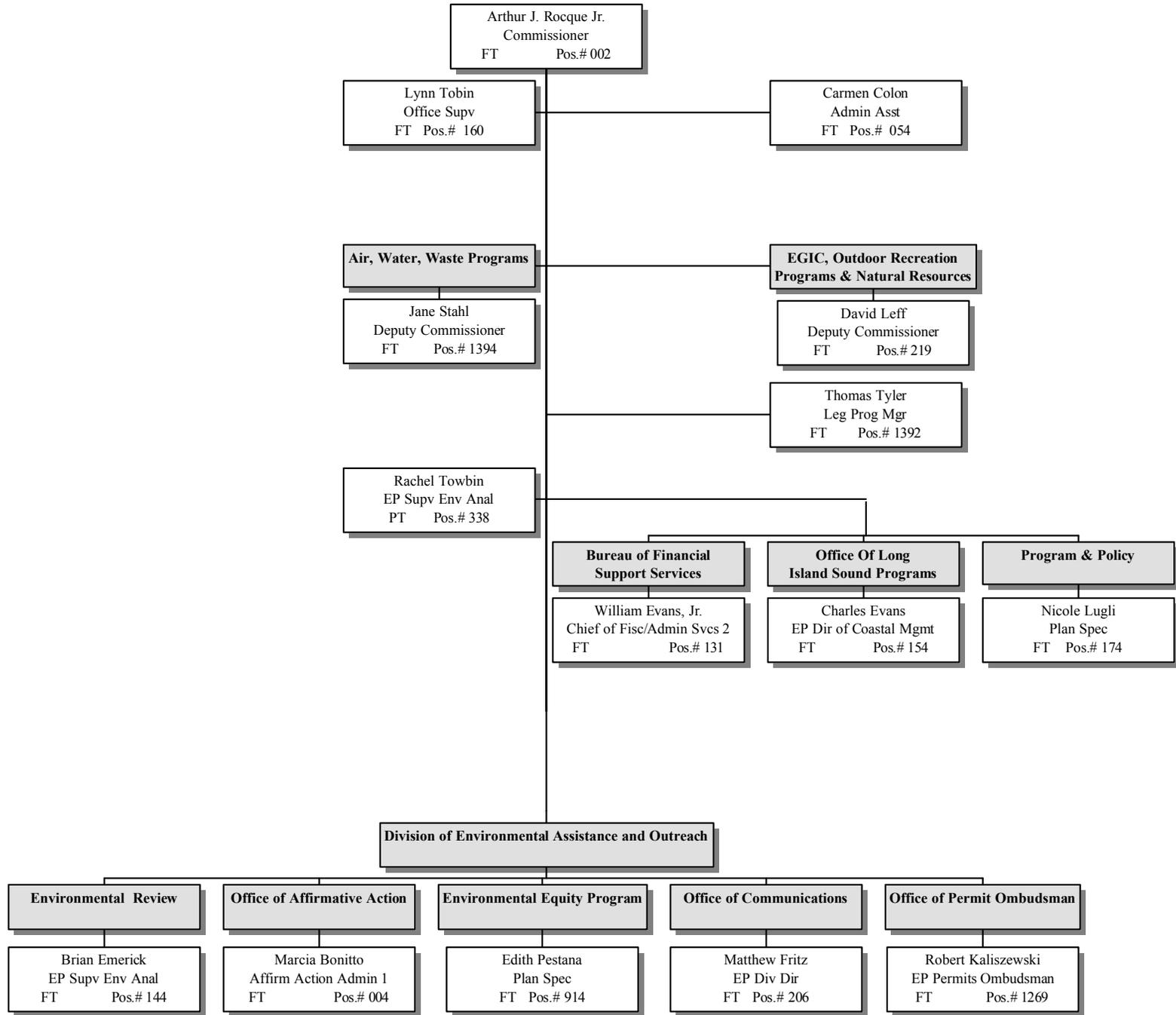
1. The State has successfully developed and implemented a nitrogen trading program for 79 POTWs. The State is well on its way to meeting its 15-year nitrogen reduction goals for surface waters including Long Island Sound.
2. The State has issued 17 general permits that cover discharges to surface waters, sanitary sewers, and groundwaters.
3. An Expedited Permit Review Protocol is used for renewal of certain individual sewer discharge permits to streamline this process and allow more time for priority projects including NPDES permits.
4. State water quality standards prohibit the discharge of treated sewage and industrial wastewaters to public drinking water supplies.
5. The 1992 stormwater general permit for industrial activities required effluent testing for chemical pollutants and aquatic toxicity, providing useful data at the beginning of the program. The State reviews all data and reports back to the regulated community annually to inform them of overall trends and progress. The permit also mandated that stormwater pollution prevention plans be modified as required by the State, and there are other provisions that have resulted in a strong program. Compliance assistance efforts and enforcement actions against the worst quality dischargers have been initiated.
6. The State is developing a general permit program to control the disposal of grease from restaurants and other food establishments for the purpose of preventing SSOs and other adverse effects on POTW operations. This permit was publicly noticed in August 2004, and a public hearing is scheduled for November 2004. The statewide program requires that grease traps at these establishments meet certain design criteria, that these traps be pumped out on specific schedules, and that grease be transported to approved regional grease separation facilities to be used as fuel in sludge incinerators. Two such facilities are already in operation.
7. The State has issued a General Permit for the Discharge of Stormwater from Commercial Activities, covering all large commercial sites, and requiring them to register and develop a stormwater pollution prevention plan. Enforcement actions have been initiated against violators.

Bureau of Water Management Office of the Bureau Chief

EC 01/08/04

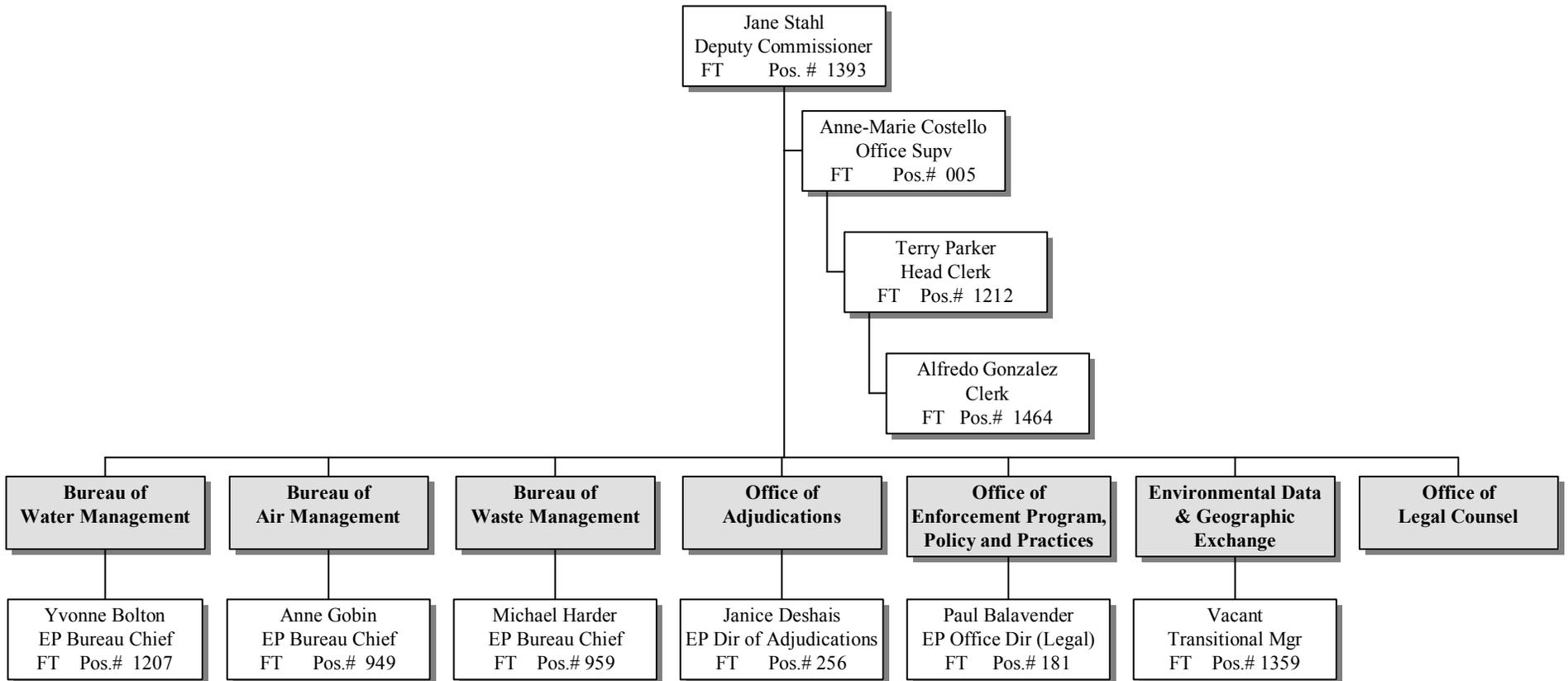


Department of Environmental Protection Office of the Commissioner

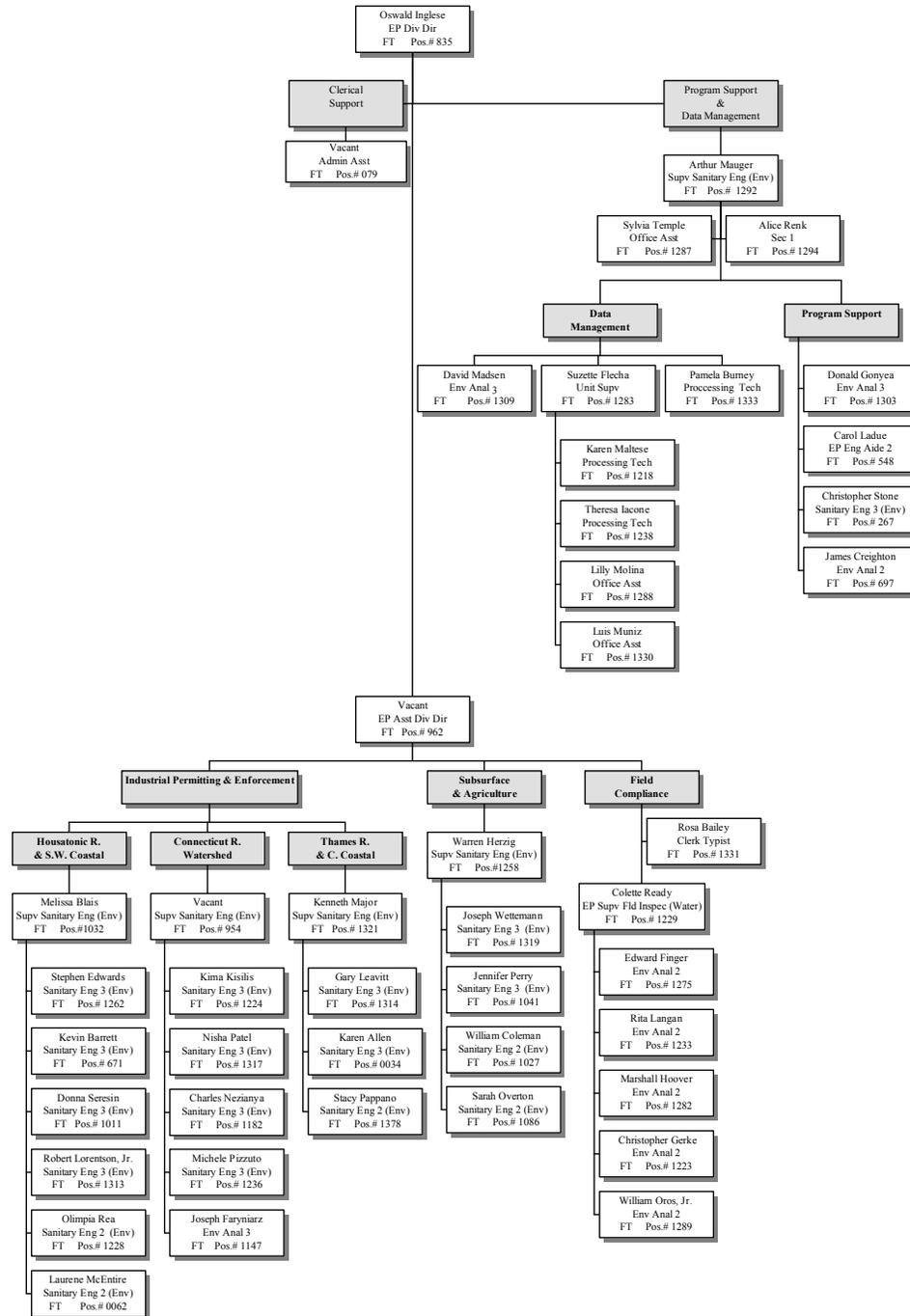


**Office of the Deputy Commissioner
Air, Water, Waste Programs**

EC 04/17/2003

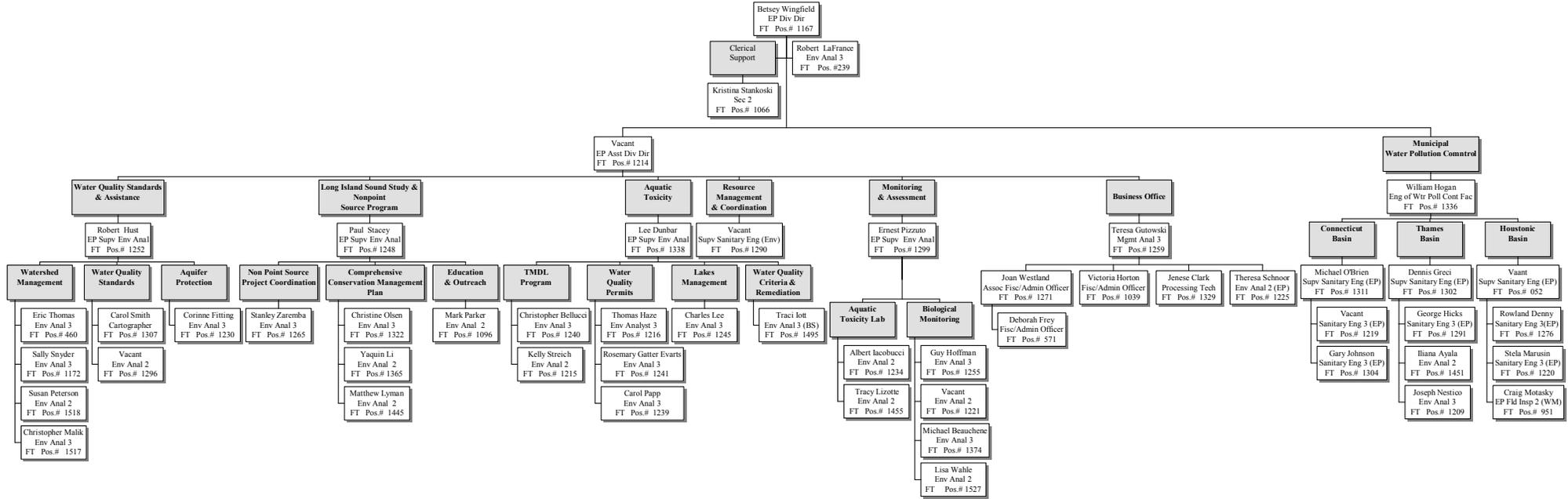


Bureau of Water Management Permit, Enforcement, Remediation Division



Bureau of Water Management Planning & Standards Division

EC 02/19/04



NPDES Management Report, Fall 2004

Connecticut

			Profile Section	GPRA Goal	Nat. Avg.	National Data Sources		Additional Data	
						State Activities	EPA Activities	State Activities	EPA Activities
NPDES Progress									
Universe	1	# major facilities (6,690 total)	I.1		n/a	109	0		
	2	# minor facilities covered by individual permits (42,057 total)	I.1		n/a	87	0		
	3	# minor facilities covered by non-storm water general permits (39,183 total)	I.1		n/a	0	0		
	4	# priority permits (TBD)	I.6			--	--		
	5	# pipes at facilities covered by individual permits (142,761 total)	I.7		n/a	741	--		
	6	# industrial facilities covered by individual permits (32,505 total)	I.1		n/a	102	2		
	7	# POTWs covered by individual permits (15,197 total)	I.1		n/a	85	0		
	8	# pretreatment programs (1,482 total)	II.2		n/a	n/a	--		
	9	# Significant Industrial Users (SIUs) discharging to pretreatment programs (22,158 total)	II.2		n/a	--	--	221	
	10	# Combined Sewer Overflow (CSO) permittees (831 total)	II.5		n/a	5	--		
	11	# CAFOs (current and est. future) (17,672 total)	II.3		n/a	9	--		
	12	# biosolids facilities (TBD '05)	II.6			--	--		
NPDES Program Administration	13	State or Region assessment of State NPDES program (none (N)/assessment (A)/profile (P))	I.1	50 states 2004	n/a	P	P		
	14	% pipes at facilities covered by individual permits w/ lat/long in PCS	I.7		46.3%	39.1%	--		
	15	State CAFO legal authority expected (mo/yr)	II.3	2005	n/a	NC	n/a		
	16	# Withdrawal petitions/legal challenges (22 total)	I.4		n/a	0	n/a		
	17	DMR data entry rate	I.7		95%	99%	--		
	18	# permit applications pending (1,011 total)	I.6		n/a	0	--		
NPDES Program Implementation	19	% major facilities covered by current permits	I.6	90%	83.7%	72.5%	n/a		
	20	% minor facilities covered by current individual or non-storm water general permits	I.6	90% 12/04	87.0%	58.6%	n/a		
	21	# major facilities w/permits expired >10 yrs. (56 total)	I.6		n/a	2	0		
	22	% priority permits issued as scheduled (TBD '05)	I.6	95% 2005		--	--		
	23	% pretreatment programs inspected/audited during 5 yr. inspection period	II.2		85.3%	n/a	--		
	24	% SIUs w/control mechanisms	II.2		99.2%	--	--	100.0%	
	25	% of CSO permittees with long-term control plans developed or required	II.5	75% 2008	82.2%	100.0%	--		
	26	% CAFOs covered by NPDES permits	II.3		35%	0%	--		
	27	% biosolids facilities that have satisfied part 503 requirements (TBD '05)	II.6			--	--		
	28	# Phase I storm water permits issued but not current (76 total)	II.4		n/a	0	0		
	29	# Phase I storm water permits not yet issued (5 total)	II.4		n/a	1	0		
	30	Phase II storm water small MS4 permits current (Y/N/D (draft)) (35 States)	II.4	100% states 2008	n/a	Y	Y		
	31	Phase II storm water construction permit current (Y/N/D (draft)) (49 States)	II.4	100% states 2008	n/a	Y	Y		
NPDES Compliance Monitoring and Enforcement Response	32	% major facilities inspected	III.3		71%	78%	3%		
	33	(inspections at minors) / (total inspections at majors and minors)	III.3		76%	63%	0%		
	34	% major facilities in significant non-compliance (SNC)	III.1		20%	17%	--		
	35	% SNCS addressed by formal enforcement action (FEA)	III.1		14%	0%	--		
	36	% SNCS returned to compliance w/o FEA	III.1		70%	100%	--		
	37	# FEAs at major facilities (666 total)	III.1		n/a	11	0		
	38	# FEAs at minor facilities (1,660 total)	III.1		n/a	7	0		

Explanation of Column Headers:

Profile Section: For each measure, this column lists the section of the profile where the program area (including any additional data for the measure) is discussed.

National Data Sources: The information in these two columns is drawn from two types of sources:

(1) EPA-managed databases of record for the national water program, such as PCS, the National Assessment Database, and the National TMDL Tracking System. NPDES authorities are responsible for populating PCS with required data elements and for assuring the quality of the data. EPA is working to phase in full use of NAD and NTTs as national databases.

(2) Other tracking information maintained by EPA Headquarters for program areas such as CAFOs, CSOs, and storm water.

The [definitions document](#) accompanying this Management Report provides a detailed definition of each data element in the National Data Sources columns.

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EPA Activities: Information in these columns reflects activities conducted by the EPA Region within the State.

NPDES Management Report, Fall 2004 Connecticut

		Profile Section	GPRA Goal	Nat. Avg.	National Data Sources		Additional Data		
					State Activities	EPA Activities	State Activities	EPA Activities	
Water Quality Progress									
Universe	39	River/stream miles (3,419,857 total)	IV.2		n/a	5,511	n/a		
	40	Lake acres (27,775,301 total)	IV.2		n/a	62,185	n/a		
	41	Total # TMDLs in docket at end of FY 2003 (52,795 total)	IV.4		n/a	380	--		
	42	# TMDLs committed to in FY 2003 management agreement (2,435 total)	IV.4		n/a	6	0		
	43	# Watersheds (2,341 total)	IV.2		n/a	--	--		
Water Quality Administration	44	On-time Water Quality Standards (WQS) triennial review completed (42 States)	IV.3		n/a	Y	n/a		
	45	# WQS submissions that have not been fully acted on after 90 days (32 total)	IV.3	<25% submissions	n/a	n/a	1		
Water Quality Implementation	46	State is implementing a comprehensive monitoring strategy (Y/N) (TBD)	IV.1	all states 2005	--	--	--		
	47	% river/stream miles assessed for recreation	IV.2		13.8%	22.0%	n/a		
	48	% river/stream miles assessed for aquatic life	IV.2		22.0%	27.0%	n/a		
	49	% lake acres assessed for recreation	IV.2		49.4%	44.8%	n/a		
	50	% lake acres assessed for aquatic life	IV.2		48.5%	44.8%	n/a		
	51	# outstanding WQS disapprovals (23 total)	IV.3		n/a	0	n/a		
	52	WQS for E. coli or enterococci for coastal recreational waters (12 States)	IV.3	35 states 2008	n/a	Y	n/a		
	53	WQS for nutrients or Nutrient Criteria Plan in place (13 States)	IV.3	25 states 2008	n/a	N	n/a		
	54	Cumulative # TMDLs completed through FY 2003 (10,807 total)	IV.4		n/a	37	--		
	55	# TMDLs completed in FY 2003 (2,929 total)	IV.4		n/a	1	0		
Environmental Outcomes	56	# TMDLs completed through FY 2003 that include at least one point source WLA (5,036 total)	IV.4		n/a	23	--		
	57	% Assessed river/stream miles impaired for swimming in 2000	IV.2		--	17.1%	n/a		
	58	% Assessed lake acres impaired for swimming in 2000	IV.2		--	1.0%	n/a		
	59	# Watersheds in which at least 20% of the water segments have been assessed and, of those assessed, 80% or more are meeting WQS (440 total)	IV.2	600 2008	n/a	--	--		

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