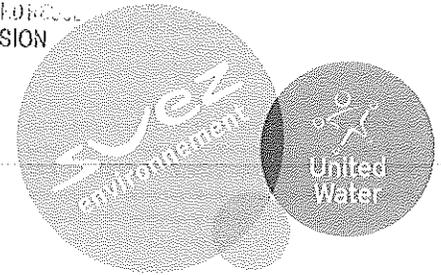


Julio Segarra
Plant Manager

JUL 31 2009



UNITED WATER AOS, INC.
24 Commerce Road, Newtown, CT 06470
Tel: 203.270.4313 Fax: 203.270.4316
Julio.Segarra@unitedwater.com
www.unitedwater.com

July 28, 2009

Mr. Rowland Denny
Senior Sanitary Engineer
CT DEP, Water Bureau
Planning and Standards Division
79 Elm Street
Hartford, CT 06106-5127

RE: Connecticut Water Quality Standards Triennial Review
Town of Newtown WPCF

Dear Mr. Denny:

The Connecticut Department of Environmental Protection (DEP) is soliciting comments on the Connecticut Water Quality Standards (WQS) for the DEP to consider for potential revision. This letter is written to provide comment on proposed revisions to the WQS at the direction of the Newtown Water Pollution Control Authority (WPCA).

As a condition of the current NPDES permit, Fuss & O'Neill was retained to study copper sources being discharged into the Newtown sanitary sewerage system. Based on the subsequent report (as submitted to the DEP) it was apparent that there were no specific sources within the collection system with a significant copper contribution. The copper is apparently entering throughout the collection system.

While there are elevated copper levels in its' effluent, the Newtown WPCF has also consistently passed the required acute and chronic toxicity tests showing that the existing operation is protective of the receiving stream.

Site-specific criteria were included in the 1997 WQS for receiving streams with WPCF in-stream concentrations in excess of 20%. With an in-stream waste concentration of 38.5% the Town of Newtown requests that the receiving stream for the Newtown WPCF, the Pootatuck River, be added to the list of waters in the WQS for which site-specific criteria have been adopted. With this revision the DEP can modify the copper limits in Newtown's NPDES permit based on the site-specific criteria providing some relief to the Town of Newtown WPCF on copper limits while still being protective of the receiving stream.

Should you need additional information, please feel free to call either of us with any questions.

Very truly yours,

United Water AOS, Inc.

A handwritten signature in black ink that reads 'Julio Segarra'.

Julio Segarra
Plant Manager

Town of Newtown

A handwritten signature in black ink that reads 'Fred W. Hurley, Jr.'.

Frederick W. Hurley, Jr.
Director, Public Works
203-270-4300

cc: Richard Zane, Chairman, Newtown Sewer and Water Commission