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To Members of the Commerce Committee:

Covanta Energy owns and/or operates four energy from waste facilities (EFW) in Connecticut, each of which uses a significant quantity of water for a variety of production and cooling purposes. These facilities each have wastewater discharge permits issued by the CT DEP; Covanta takes its commitment to environmental protection seriously, and we have a concern about recent developments in the State's Water Quality Standards (WQS).

Connecticut's WQS form the foundation for virtually all of DEP's water permitting and remediation programs. Current law requires periodic updating of the WQS but provides no state governmental process outside of DEP itself. DEP is currently proposing over 500 new or modified numeric standards. Some of these standards will have a substantial impact on all manufacturing as well as many other businesses and economic development projects in Connecticut. Yet, DEP has complete control over the adoption of these new standards with neither opportunity for administrative appeal nor legislative review (through the Regulations Review Committee).

The potential impact of these standards is too significant, economically and otherwise, to limit the adoption/revision process solely to the DEP.

Covanta Energy requests that you please support SB-174.

Sincerely,

Jason P. Farren, P.E.
Environmental Compliance Engineer
Covanta Energy, Inc.