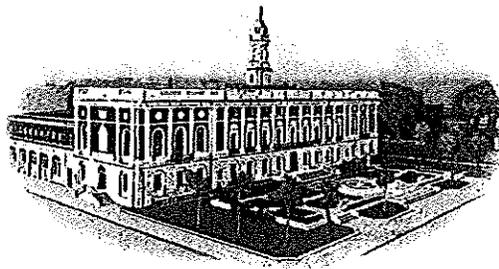


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WATER POLLUTION CONTROL
210 MUNICIPAL ROAD, WATERBURY, CT 06708

Testimony In favor of SB 440

Denis A. Cuevas
City of Waterbury, Water Pollution Control Department

Before the Planning & Development Committee
March 21, 2012

Reference: Raised Senate Bill 440 AN ACT AUTHORIZING AMOUNTS IN THE CLEAN WATER FUND TO BE USED FOR PHOSPHOROUS REMOVAL.

I thank you for the opportunity to testify before this committee on behalf of the City of Waterbury, Water Pollution Control Department. The City is in favor of SB-440 to assist in the capital improvement costs associated with the state Department of Energy & Environmental Protection's (DEEP) plan to limit phosphorous discharge for the City's Water Pollution Control Facility (WPCF). The changes in SB 440 to the Clean Water Fund that include phosphorous removal projects will help the City in covering some of the cost associated with meeting the DEEP's proposed phosphorous limits.

The City's WPCF is the fourth largest wastewater treatment facility in the state and the largest facility along Connecticut's Naugatuck River that will be required to meet the proposed phosphorous limits. This facility serves Waterbury, Watertown, Wolcott; and parts of Naugatuck, Prospect and Cheshire.

As the largest wastewater treatment facility on the Naugatuck River, the Waterbury WPCF provides treatment to an average effluent flow of 21 million gallons a day. Improvements to the facility would include the installation of treatment technologies and operational changes to reduced phosphorus nutrient with a goal of achieving a 0.1 mg/l desired by the US Environmental Protection Agency (EPA), which is lower than the 0.2 mg/level currently being discussed by State DEEP. The capital improvements to the facility would lower phosphorus to a 0.2 mg/l level and would result in a 94 percent reduction of the total phosphorus load with a 97 percent reduction at a 0.1 mg/l level. The reason to plan for a lower limit is based on indications that there is some uncertainty about the current 0.2 mg/l effluent limit which may be more stringent in future permits.

The reduction of phosphorus to the proposed 0.2mg/l level will be required in the National Pollutant Discharge Elimination System (NPDES) permit that is scheduled to be issued within the next two to three months. This permit is presently being drafted by the DEEP and the City has been notified of the stricter requirements regarding phosphorous. The Water Pollution Control is working with an engineering firm to determine the specific type of treatment technology that will best meet its needs in terms of technical feasibility, effluent quality, capital costs, operations ease and flexibility, hydraulic impacts and implementations schedule. It is estimated that the overall capital improvement cost for the phosphorous project to be \$45,000,000 and annual operation/maintenance cost to be \$750,000.

The City of Waterbury has demonstrated a commitment to the environment and has shouldered the burden in terms of cost to building and improving the WPCF. The facility improvements related to phosphorus limits, while necessary and desirable for the health of the Naugatuck River, will create a heavy financial burden on Waterbury and its citizens who are still paying the costs associated with the facilities upgrade completed in 2002.

In light of the City's bonding needs, debt service and annual budget commitments, the City must seek and rely upon assistance from the Clean Water Fund to make additional improvements to its WPCF. Considering the regional service of the facility, benefits that and improvements to the receiving waters, it is fitting that the City of Waterbury seek aid through the Clean Water Fund to implement the proposed phosphorous project.