



REGION 1

BOSTON, MA 02109

November 26, 2024

Traci Iott
TMDL Program Coordinator
Bureau of Water Management and Land Reuse
Connecticut Department of Energy and Environmental Protection (CT DEEP)
79 Elm Street
Hartford, CT 06106

RE: Acceptance of Connecticut's Advance Restoration Plan for Total Phosphorus In Non-Tidal Surface Waters

Dear Ms. Iott:

Thank you for submitting the Advance Restoration Action Plan for Total Phosphorus in Non-Tidal Surface Waters (dated September 2024) to EPA for acceptance as an advance restoration plan. The 82 stream segments include 18 segments which were placed on the Clean Water Act (CWA) Section 303(d) list of impaired waters in 2018 and 2022 due to excess total phosphorus leading to non-support of the designated use of Habitat for Fish, Other Aquatic Life and Wildlife or Recreation, and an additional 64 segments with wastewater treatment plants known to be sources of phosphorus. The action plan (together with supplemental information in linked documents and the submittal letter) includes an analysis of the diatom-based nutrient enrichment factor which Connecticut has developed as an indicator of impairment. Connecticut has used the target to calculate target discharge limits for permitted discharges from municipal and industrial wastewater treatment facilities. The State has also included specific additional requirements to implement the plan for stormwater discharges covered under the State's Municipal Separate Storm Sewer Systems (MS4) and Industrial Stormwater General permits for waters in which phosphorus has been identified as a Stormwater Pollutant of Concern.

Consistent with the EPA memorandum from Benita Best-Wong, dated August 13, 2015, with the subject line, "Information Concerning 2016 Clean Water Act (CWA) Sections 303(d), 305(b) and 314 Integrated Reporting and Listing Decisions" and the EPA TMDL Vision framework ("the Vision"), the submitted plan was written to inform and guide pollutant load reduction implementation. In this case, EPA understands that these permit modifications have already been made so that we may consider the plan as having been implemented. We accept the Advance Restoration Action Plan for Total Phosphorus in Non-Tidal Surface Waters as an advance restoration plan to be counted towards the CWA 303(d) programs Vision bridge metric, which is a performance measure used to track progress in implementing the program for the FY2023-2024 period. The phosphorus impairments will remain on

the State's CWA 303(d) list until monitoring confirms that water quality criteria have been met in the segments, at which point they may be removed from the list.

Thank you again for your submittal of this thorough and informative advance restoration plan.

Sincerely,

Katie Lamoureux, Chief
Water Quality & Wetlands Protection Section

cc: Rebecca Jascot, CT DEEP
Grace Hoeckele, CT DEEP
Steven Winnett, EPA
Ivy Mlsna, EPA