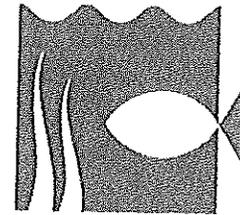


**Connecticut Fund
for the Environment**



Save the Sound™
A program of
Connecticut Fund for the Environment

**Testimony of Connecticut Fund for the Environment/Save the Sound
Before the Environment Committee**

**In Support of SB 747 AAC Consistency In Permitting Requirements for Alternative On-Site
Treatment Systems and H.B. 5465 AAC Phosphorus in Detergents**

**Submitted by:
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Connecticut Fund for the Environment is a statewide multi-issue non-profit environmental organization using law, science and public education to defend and improve the air land and water in Connecticut and the Long Island Sound. CFE and its permanent Save the Sound program represent over 6,000 members.

CFE strongly supports S.B. 747 AAC Consistency In Permitting Requirements for Alternative On-Site Treatment Systems. Put quite simply, ATS' have not worked in Connecticut as they have been advertised. These systems are based on treatment plant technologies and are supposed to treat effluent to drinking water standards. The reality has been quite different. Investigation of DEP records have shown that a remarkably large percentage of these systems are failing and polluting state waters, groundwater and wetlands. Moreover, DEP does not have sufficient resources to police such systems and, as a result, violations and malfunctions are not being addressed appropriately.

Two years ago DEP's authority to regulate some of these small systems (5,000 gallons or less per day) was delegated to the Department of Health with appropriate guidance as to what factors the Department of Health should consider. These included pro-environment common sense measures such as "(1) The impact that such systems or discharges may have individually or cumulatively on public health and the environment, (2) the impact that such systems and discharges may have individually or cumulatively on land use patterns, and (3) recommendations regarding responsible growth made to said commissioner by the Secretary of the Office of Policy and Management." Conn. Gen. Stat. § 19a-35a.

The language allowing DEP to regulate the larger systems has no such language. There is no reason these same protections should not be applied to the bigger systems which would be expected to have a greater environmental and public health impact. Accordingly, we strongly urge this committee to apply the common sense protections that apply to the smaller systems under DPH's jurisdiction to those larger systems under DEP's authority.

CFE also strongly supports H.B. 5465 AAC Phosphorus in Detergents. Phosphorous from our sewage treatment plants and from stormwater runoff creates slimy algae blooms in lakes and rivers severely degrading their ecological and recreational quality. The algae kills inland lakes and rivers by preventing sunlight from getting into the waterbody and at the same time creates low (or even no) oxygen zones. It is also incredibly unpleasant and can destroy the ability of people to swim, boat and fish in a lake and River.

The Connecticut DEP and EPA will be taking increasingly strong measures to limit the amount of phosphorous pollution from our sewage treatment plants and from stormwater. These measures will have costs, but the environmental benefits from clean water will be well worth it. This bill will reduce the amount of phosphorous that we use, thereby saving resources that would otherwise be required to remove the phosphorous once it enters the sewage treatment plant. By taking common sense measures to reduce unnecessarily high levels of phosphorous in dishwasher and laundry detergents, we will make significant progress to clean up our water at a very reasonable cost. Other states have phased out unnecessarily high levels of phosphorous and Connecticut should as well. We strongly urge your support of this bill.