

Thanks, all:

1082 AAC Brownfield Redevelopment, Institutional Controls, and Significant Hazard Programs. RA has signed on to testimony of CFE. We also agree with Attorney Catino that there is significant uncertainty in how to exit the program in addition to uncertainty in other processes. One key question is how risk is assessed. The formulas clearly are important but they seem to be still in development. We hope there will be time to review areas of uncertainty.

We have taken a small part in DEEP's Remediation Transformation effort. And we agree with the Brownfields Working Group and DEEP that the brownfields program offers the promise of simultaneous economic and environmental benefits. We have looked at this potential especially with respect with to the Naugatuck River watershed.

On the other hand, we have yet to see reassurance that funding can be found to supervise and manage the program adequately. In the end, it's possible that the state will need to investigate establishing a multi-stakeholder review and enforcement board, supported by both private and public funds.

5335 AA Prohibiting the Possession and and Storage of Fracking By-Products. Rivers Alliance supports the approach used in Vermont, where the law imposes a moratorium on both fracking and disposing of fracking waste pending a study on methods for performing these actions safely. We believe this requirement for demonstrating safety is consistent with the position of DEEP Commissioner Esty. DEEP has been looking to NY State to learn from their experience. But the NY program is on hold pending further study.

6653 AAC DEEP Regulatory Streamlining to Assist Municipalities. A local sewage-management plan should address the use of advanced on-site sewage treatment facilities. This technology allows for dense development in areas where it is not possible to use conventional septic. This can be good or bad in terms of environmental and economic goals. But a town should plan for how best to deploy such technology (or not). The process should be the same as for planning sewer service and sewer-avoidance areas.

In addition the state needs to develop regulations for small advanced systems (under 5000 gpd). The systems are based on controlled bacterial action, similar to most municipal systems that discharge to surface waters. Thus far their performance in CT has been variable and oversight and enforcement has been weak.

In streamlining, we believe it is not prudent to change DEEP's responsibilities under general permits from "shall" take stipulated actions to "may."

We look forward to the chance to work with the Committee in any way you deem useful.

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Sent via BlackBerry by AT&T