

Testimony of the Connecticut Association of Directors of Health

To Oppose Raised Bill No. 963: An Act Concerning the Expiration of Approvals for On-Site Sewage Disposal Systems with Design Flows of Less than Five Thousand Gallons Per Day

To the Distinguished Co-Chairs and Members of the Planning and Development Committee
March 11, 2013

Good afternoon, distinguished Co-Chairs and Members of the Planning and Development Committee. My name is Karen Spargo, President of the Connecticut Association of Directors of Health (CADH) and Director of Health of the Naugatuck Valley Health District, serving the towns of Ansonia, Beacon Falls, Derby, Naugatuck, Seymour and Shelton.

CADH opposes *Raised Bill 963: An Act Concerning the Expiration of Approvals for On-Site Sewage Disposal Systems with Design Flows of Less than Five Thousand Gallons Per Day*, which would extend the expiration of certain approvals for certain on-site sewage disposal systems, risking installation using outmoded standards.

Subsurface sewage disposal systems are systems consisting of a house or collection sewer, a septic tank followed by a leaching system, any necessary pumps or siphons, and any groundwater control system on which the operation of the leaching system is dependent. Local health departments issue permits or approvals to construct, alter, repair, or extend subsurface sewage disposal systems. The permitting and approval process protects the public by ensuring that system design elements conform to the most recent of constantly evolving standards.

Technical standards for subsurface sewage disposal systems are revised approximately every two years. Currently, approvals to construct subsurface sewage disposal systems are valid for one year from issuance and terminate if construction fails to start within that period, though an additional one-year extension may be granted for reasonable cause.¹ Raised Bill 963 extends the approval time to nine years, resulting in subsurface sewage disposal systems installed according to technical standards that could already be four versions old. In that time, standards can change in all aspects of design elements, including separating distances, piping material, and equipment. The permitting process should capture the most current thinking on how best to install these systems.

Connecticut residents are entitled to have on-site sewage disposal systems installed according to the most up-to-date technical standards. Accordingly, CADH opposes *Raised Bill 963*. CADH is a nonprofit organization comprised of Connecticut's 74 local health departments and districts. Local health directors are the statutory agents of the Commissioner of Public Health and are critical providers of essential public health services at the local level in Connecticut. Thank you for your consideration.

¹ Section 19-13B103e(f)(1) of the Public Health Code