

COUNCIL ON ENVIRONMENTAL QUALITY



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TESTIMONY

DATE: March 7, 2014

TO: Environment Committee
Connecticut General Assembly

FROM: Karl J. Wagener
Executive Director

RE: Raised Bill 5421, AAC Authorizing the Use of Alternative Sewage
Treatment Plants in Certain Wastewater Management Districts

The Council on Environmental Quality is not offering testimony on the specific matter of delegating permitting authority for alternative treatment systems (ATS) to wastewater management districts. The Council wants you to know about a report that it released yesterday that examines compliance among ATS facilities, and recommends that if this bill goes forward you should add a provision that adds consequences to the law for any facility that fails to submit required monitoring reports.

The full report, [Testing the Effluent: Some Systems Pass, Some Don't, and Some Won't Say](#), is on the CEQ's website today. Here are the main points you should know:

- Fifteen of the 41 ATS facilities submitted all of their required reports. Most failed to submit some reports, and four missed most or all of them.
- Six of the 41 permitted ATS facilities reported no violations of effluent limits, while 12 averaged more than one violation per monthly report. (These tests are conducted at the point where the effluent leaves the treatment system but before it enters the leaching field, where further renovation of the wastewater is expected.)
- The Council selected five facilities (based on higher frequency of violations reported) for examination of the reports from monitoring wells, which are on the periphery of the systems. Three of the five reported violations of the relevant standards.
- No Notices of Violation were issued for these systems during the review period.

It appears that the consequences are the same for reporting that you are in compliance, reporting that you are not in compliance, or not reporting at all. **The Council recommends that CGS Section 22a-439 be amended so that facilities which fail to report would face penalties, a shorter time period before they would have to renew their permits, higher permit renewal fees, or a combination of the three.**

Thank you for your consideration of these comments. Some of the key statistics are illustrated on the next page.

**Chart 1: Compliance with Reporting Requirements,
2011 - 2012
(41 Permitted Facilities)**

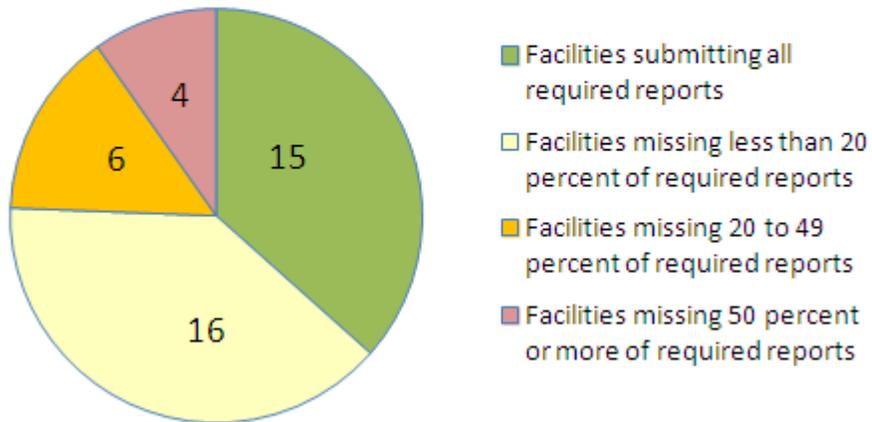


Chart 1 shows that 15 of the 41 permitted ATS facilities submitted all of their required monthly and/or quarterly reports during 2011 and 2012.

**Chart 2: Average Number of Effluent Violations Reported by
ATS Facilities, 2011 - 2012
(41 Permitted ATS Facilities)**

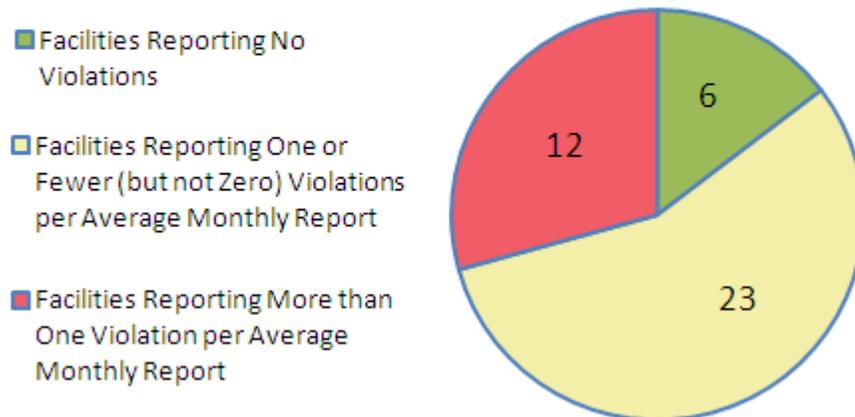


Chart 2 shows that six of the 41 permitted ATS facilities reported no violations of their permit limits for six key pollutants during 2011 and 2012. These violations are measured at the point where the treated effluent leaves the treatment system but before it enters the leaching field, where further renovation of the wastewater is expected.