



Connecticut Department of Public Health

Testimony Presented Before the Environment Committee

March 14, 2018

**Commissioner Raul Pino, M.D., M.P.H.
860-509-7101**

Senate Bill 342 - An Act Concerning the Threshold for the Department of Energy and Environmental Protection's Review of Alternative Treatment Septic Systems

The Department of Public Health (DPH) provides the following information regarding Senate Bill 342, which increases the threshold for the Department of Energy and Environmental Protection's (DEEP) review of alternative treatment septic systems to a capacity of seven thousand five hundred gallons. Thank you for the opportunity to testify on this important issue.

Decentralized sewage systems serve approximately 40 percent of Connecticut's population; whereas centralized sewer systems serve the remaining population. The vast majority of decentralized sewage systems in Connecticut are conventional subsurface sewage disposal systems (a.k.a., septic systems) that are regulated by DPH and our local health partners. Section 30 of [Public Act No. 17-146](#) increased the Department of Energy and Environmental Protection's (DEEP) jurisdictional threshold for these conventional systems from 5,000 gallons per day (GPD) to 7,500 GPD.

A very small percentage of decentralized sewage systems used in Connecticut are alternative systems that are permitted by DEEP. Historically, it was recognized that DPH and its local health partners were better positioned to regulate small alternative systems, which led to the passage of legislation in 2007 that is codified in [CGS Sec. 19a-35a](#). The law provides for the transfer of jurisdiction from DEEP to DPH for alternative on-site sewage treatment systems with capacities up to 5,000 GPD, once DPH promulgates regulations that govern such systems. Unfortunately, no funding was ever appropriated to facilitate DPH's efforts to adopt regulations and operate an administrative program for these alternative systems.

DPH does not oppose raising the cited jurisdictional threshold in the statute from 5,000 GPD to 7,500 GPD to bring it in-line with the new jurisdictional threshold for conventional septic systems. However, DPH opposes legislation that requires the Department to develop regulations and an accompanying program for alternative sewage systems without the necessary resources to support such initiatives.

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All decentralized sewage systems, both conventional and alternative, need to be properly managed to allow the state to meet its environmental and health protection goals. Proper management of alternative sewage systems is especially important because they require significantly more oversight than conventional septic systems. DPH supports the Environmental Protection Agency's (EPA) recommendations for states to re-evaluate their Clean Water State Revolving Fund programs to ensure decentralized sewage system needs are adequately determined and sufficiently funded as a means to implement comprehensive sewage system management programs.

Thank you for your consideration of this information.

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