Connecticut Department of Public Health

Testimony Presented Before the Planning and Development Committee

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Commissioner Raul Pino, M.D., M.P.H.
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Senate Bill #1013 - An Act Concerning Certain Sewage Disposal Systems and Alternative Sewage Treatment Systems

The Department of Public Health (DPH) is opposed to Senate Bill #1013. 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 CT 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. DPH has handled the increased workload that resulted from the 2017 legislation with existing resources. Section 1 of Senate Bill #1013 seeks to further raise the jurisdictional threshold to 10,000 GPD. DPH opposes further raising the jurisdictional threshold as the increased workload cannot be handled within the Department’s existing resources.

A very small percentage of decentralized sewage systems used in CT are alternative systems 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.

Section 2 of Senate Bill #1013 eliminates the “within available appropriations” language in CGS Sec. 19a-35a. 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. Additional resources would be needed for program staffing, as well as for a management and data tracking system to ensure proper oversight and performance of these alternative systems. 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 operational effort and maintenance than conventional septic systems. DPH supports the Environmental Protection Agency’s recommendations for states to reevaluate 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.