



## Greater New Haven Water Pollution Control Authority

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**March 3, 2021**

**Testimony for Senate Bill 927**  
**An Act Concerning Revisions to the Sewage Spill Right to Know Statute**

Thank you for the opportunity to comment on Senate Bill 927, the Greater New Haven WPCA provides regional wastewater collection and treatment services to approximately 200,000 people in the City of New Haven and the Towns of East Haven, Hamden, and Woodbridge. While the Greater New Haven WPCA appreciates the intent of the legislation and supports efforts of informing the public about sewage spills we were hoping the Committee could provide more clarity in section 3 of the bill.

*(3) On and after July 1, 2018, not later than two hours after becoming aware of any sewage spill that [exceeds five thousand gallons or that is anticipated to exceed five thousand gallons] may present a threat to public health or the environment, considering the potential for human exposure or exposure of aquatic life, respectively, and any other relevant factors, the operator of a sewage treatment plant or collection system shall notify the chief elected official, or such official's designee, and the local health director of the municipality where the sewage spill occurred.*

In section 3, the bills asks that spills be reported if the operator feels the spill may serve 'as a threat to public health or the environment'. We are concerned the language in section 3 is too vague and leaves a lot of room for interpretation. Having the operators decide if there is a threat to public health or the environment ignores the fact that operators are required to notify the local health department and the Department of Energy and Environmental Protection for all spills. These are the proper entities to assess if a spill is a danger to public health or the environment and these entities are already being notified of all spills. To put this decision making on the operators at a time when they are focused on stopping the spill may lead to second guessing by others after the fact. As they are not the experts in dealing with impacts to public health or the environment, they need more clear and concise direction to implement the additional reporting required by this act. Establishing a concrete number or anticipated spill volume will better provide operators clarity on how to respond to each spill.

As the existing notification system will be taking on new tasks please provide DEEP with the proper resources to allow for a fully developed system that works for everyone. The current system is problematic, and the concern is that adding additional tasks with out improving the existing base program may not have the intended outcome for a proper notification system.

We appreciate the Committee's work on this issue and look forward to working with you.

**Thank you for the opportunity to comment on this proposal.**