



**For the Environment Committee
Testimony of Alicea Charamut, Executive Director
March 17, 2025**

Rivers Alliance was formed to fight for sound water policies at the state and federal levels, to provide education on water resources, and to advocate for any person or group striving to protect water. If you want clean, free-flowing and healthy rivers, and high-quality drinking water, Rivers Alliance is here to help.

Thank you for the opportunity to provide testimony on the following raised bill before you today.

HB 5749 - An Act Concerning Advanced Septic Systems with Nitrogen Removal Features - Opposes

Rivers Alliance supports efforts to reduce nitrogen pollution from Onsite Wastewater Treatment Systems (OWTS), including the use of Alternative Treatment Systems (ATS). However, successfully implementing ATS requires a robust regulatory framework to ensure proper oversight, maintenance, and enforcement. Unfortunately, Connecticut does not yet have the necessary programs in place to support this transition – particularly at the scale that this bill proposes.

It is important to recognize that ATS differ significantly from conventional septic systems. While they offer advantages—such as allowing development in areas where space or cost constraints make sewers impractical—they also come with significant risks. ATS require continuous monitoring and maintenance to function properly. Without proper care and maintenance, ATS can fail, leading to water pollution and public health risks.

Key Concerns with the Proposed Bill

1. Lack of a Regulatory Program at DPH

The Department of Public Health (DPH) currently lacks the regulatory framework and resources to permit ATS up to 5,000 gallons per day, as required by statute. Without an established program, regulatory authority remains with the Department of Energy and Environmental Protection (DEEP), which employs a rigorous, site-specific permitting process. This process includes extensive engineering and environmental evaluations, adding significant cost and complexity to installations. Moving forward with mandated ATS implementation before DPH develops a regulatory program risks inconsistent oversight and potential environmental harm.

2. Insufficient Training and Resources for Local Health Departments

This bill would place a substantial burden on local health departments, which currently lack the

training and resources needed to oversee ATS effectively. Proper implementation requires local sanitarians and environmental health staff to be trained in plan review, installation, permitting, and ongoing inspections. However, DPH has not yet developed a training program to prepare local health officials for these responsibilities. Without adequate support, local enforcement will be inconsistent, increasing the risk of system failures and pollution.

Conclusion

While Rivers Alliance supports the utilization of alternative treatment systems as a tool to reduce nitrogen pollution, these changes must be accompanied by a clear regulatory framework and adequate support for enforcement. Advancing ATS without proper oversight and training could lead to unintended environmental and public health consequences.

Instead, we urge lawmakers to direct DPH and DEEP to work together sooner rather than later to establish the necessary regulatory and training programs to ensure these systems are implemented safely and effectively.