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February 24, 2016

David Deen, Chair
House Fish, Wildlife and Water Resources Committee State House
115 State St. 05633-0531
Montpelier VT

Dear Chair Deen,

I am contacting you to offer comments on H. 674. It is our understanding the current version of the bill (Draft No. 3.1 – H.674) would require operators to provide notice immediately and not to exceed 15 minutes once they discover a sanitary sewer overflow, combined sewer overflow, upset or bypass at facility, and or discharges into other storm sewer systems. VRWA is opposed to this restrictive timeframe and recommends a notice timeline of, “as soon as possible and not to exceed 24 hours.”

VRWA recognizes the importance of public notification processes, as do the systems to be impacted by this bill, but implementing such a restrictive notification timeline would be very burdensome and likely not achievable in most situations. Many of the report details may not be known immediately and likely not determined within 15 minutes of discovering a problem. There is a need to build in some investigative and data compilation time to insure an accurate spill report. Not to reduce the value of reporting but the time following discovery of an unpermitted discharge needs to be focused on solving the problem and getting system operations back in order. As noted above please consider adjusting the reporting timeline to, “as soon as possible and not to exceed 24 hours.”

Thanks for your consideration of these comments.

Sincerely,

A handwritten signature in black ink, appearing to read "Shaun Fielder", written in a cursive style.

Shaun Fielder
Executive Director