

# GREEN MOUNTAIN WATER ENVIRONMENT ASSOCIATION

*An association of water quality professionals*



Green Mountain  
Water Environment  
Association

March 23, 2016

Senator Christopher Bray  
Chair, Vermont Senate Committee on Natural Resources and Energy  
115 State Street  
Montpelier, VT 05633-5301

**REF: House Bill H. 674 – An act relating to public notice of wastewater discharges**

Dear Senator Bray:

The Green Mountain Water Environment Association (GMWEA) is a non-profit group that represents Vermont's water quality professionals. Our membership is comprised of over 550 individuals who manage the essential drinking water, wastewater collection and treatment, and stormwater management services that all Vermonters enjoy. These GMWEA members have first-hand knowledge and experience designing, operating, maintaining, and repairing this infrastructure. We are the "Boots on the Ground" water quality people who work to protect public health and improve water quality through our daily efforts.

The Board of Directors **opposes** the current version of House Bill H. 674 for the following reasons:

- The current version requires public alert within one hour and agency notification within 12 hours of the discovery of an untreated wastewater discharge. While this amount of time might be sufficient in many cases, operators have experienced occasions where more time than that was needed to investigate and stabilize an overflow event. In those cases, this bill would force the operator to either leave an overflow incident still in progress or risk a violation. We request that the bill be amended to provide time to stabilize an overflow event before requiring a public alert notification and sufficient time after an incident has ended to file a detailed report.
- The current version does not define a specific amount of wastewater discharge that would trigger a public alert notification. We believe this is an important component that needs to be addressed.

In closing, we support the concept of public notification when there is a health concern. Remediation of the situation presenting the health concern must be the priority, however. Any notification, therefore, needs to be realistic and address all aspects of the event.

Sincerely,

A handwritten signature in blue ink that reads "Christopher R. Robinson".

Chris Robinson  
President, GMWEA