

GMWEA Comments on Combined Sewer Overflows

Presented by Tom DiPietro, GMWEA President, to Senate Committee on Natural Resources and Energy
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1. Introduction to GMWEA
 - a. Thank you for the opportunity to comment.
 - b. GMWEA's members are the boots on the ground environmentalists. We construct, maintain, repair and replace Vermont's drinking water, wastewater, and stormwater infrastructure. Our members got into this field because of their commitment to clean water, specifically clean water in Vermont.
2. Frame the Issue
 - a. If it were up to GMWEA, there would never be a CSO or SSO. Unfortunately, that isn't the reality.
 - b. The history provided earlier (by DEC and others) explained why we have CSOs.
 - c. All CSOs are not equal.
 - i. You regularly hear about the larger communities (Burlington, Rutland, Montpelier, and St. Albans), but you infrequently hear about the smaller communities (Middlebury, Enosburg Fall, Springfield, Hartford, Newport, etc) that have combined systems.
 1. These smaller communities may have several overflow locations, but very infrequent discharges. In some cases, an overflow hasn't occurred in years.
 - d. Several of the CSO communities are facing many new regulatory requirements with significant needs; MS4 Phase II, Flow Restoration Plans, aged infrastructure at WWTF, municipal roads general permit, and Lake Champlain P TMDL. Compliance with all of these is very costly, so what is the priority from a water quality standpoint?
 - i. These regulatory requirement can be, and are already, in conflict.
 1. For example, in St. Albans Stormwater Flow Restoration Plans for Rugg and Stevens Brook require a reductions in stream flow. If they continue to separate the combined stormwater and sewer system it will cause additional stormwater (that is currently treated at the plant) to discharge into these tributaries, increasing the flows.
 - ii. Some communities have several large commercial building roofs that contribute significant flows to the sewer system. Any separation work here would need to occur on private property and would require extensive building renovations.
 - e. Combined sewer systems can actually be a good thing for the environment.
 - i. For example, in Montpelier the average influent flow at the Montpelier wastewater treatment Facility is 2 MGD. During a rain event the flow to the facility can double (4 MGD) without a combined sewer overflow occurring. This means the facility just treated 2 MG of stormwater. If the City had a completely separate stormwater system than 2 MG of untreated stormwater would have gone directly to the river. Even when Montpelier does have overflows the facility is treating the majority of the stormwater at the treatment plant.
3. Policy Suggestions
 - a. Monitoring
 - i. In many cases only a tell-tale, or a block, is used to determine if an overflow occurred. Some communities do have automatic flow gauging so the overflow

duration, volume, and peak flow can be documented. However, this overflow volume includes a mix of stormwater and sewer, and there is no real clarity from the State on reporting what the “sewer” portion of the overflow is.

1. As previous speakers indicated, the stormwater portion of the overflow is quite large and reporting the total amount confuses to the public; they assume it’s all untreated wastewater.

b. Elimination of CSOs

- i. The State should not adopt a policy that calls for complete elimination CSOs. This approach isn’t cost effective nor reasonable, especially with the uncertainty caused by stormwater influenced flows and other regulatory and WQ priorities.
- ii. In some cases, complete separation isn’t possible.
 1. It’s not just a cost issue, it’s also topography. Remember that we pump wastewater, but we do not pump stormwater (generally speaking). Some situations would require that we construct extensive pumping facilities for stormwater.

c. Maintenance

- i. Municipalities with combine sewer systems should do everything in their power to increase capacity in their sewer lines to help reduce the frequency of overflows.
 1. Examples: Routinely clean sewer lines, reduce groundwater infiltration into the drainage pipe system, and prevent inflow (e.g. remove roof drains from sewer lines) where possible. The more capacity you have in the sewer lines the less frequent overflows will occur.

4. Closing Remarks

- a. The GMWEA membership wants to be a partner in solving this problem.
 - i. Much of the time operators have no way to stop CSOs when they occur. The events are precipitation driven. Operators are working within the system that, in many cases, was built before they were born.
 - ii. Major system upgrades will need to be approved by the public when they vote on bonds. Keep in mind, all of us (the public) creates the wastewater that municipal staff has the responsibility of managing.
- b. Cost is a barrier. GMWEA will advocate for the grant funding necessary to implement solutions.
 - i. We often hear people say that “State funding is available”. We need to differentiate between grants and loans. Grants provide the funding needed to move these expensive projects forward. Loans (even low interest loans) still require rate-payers to foot the bill.
- c. Approach the problem holistically. This is a complex issue and it needs to be viewed in context with other water quality issues and requirements for each situation. “Eliminate CSOs now” is easy to say, but ultimately not the best solution in all cases.
- d. Thank you for the opportunity to comment.