

Amy Polaczyk Testimony on S101 to HNRFW April 14, 2021

Thank you for having me, my name is Amy Polaczyk and I am the Manager of the Wastewater Management Program in the Watershed Management Division in DEC. The program is federally delegated to implement the National Pollution Discharge Elimination System permitting and inspection of Wastewater Treatment Facilities. Our jurisdiction covers domestic and industrial facilities discharging treated wastewater directly to Vermont's surface waters. The WW program is also responsible for implementing the requirements of the 2016 CSO rule through enforceable orders.

The inclusion of CSO concerns in the discussions of S101 highlights the value Vermonters place on clean water and underlines the link between the development of affordable housing and reliable infrastructure.

Vermont has made consistent progress on CSO abatement and this work continues. In the 1990s there were 178 combined sewer outfalls in 27 municipalities, today there are 44 outfalls in 11. The 2016 CSO rule replaces the 1991 Vermont CSO policy. It is stricter than the EPA's CSO Control Policy and requires all Combined Sewer overflows to meet the Vermont Water Quality Standards (e.coli). To achieve that facilities are required to develop long-term control plans that lay out projects (and funding plans) to bring CSOs into compliance with the rule. The plans are iterative and will be reevaluated as projects are completed until the municipality is in compliance with the CSO rule. Of the 11 CSO communities in Vermont, 9 have already submitted draft LTCPs that identify projects that aim to reduce or remove overflows in the next 5 years. The remaining 2 communities are due to submit plans this calendar year. Unfortunately, the easiest abatement projects have been completed leaving the most costly and complex issues to be tackled next.

CSOs are a remnant of an engineering approach that allows first-flush stormwater to be treated by the WWTF and avoid dangerous and costly combined sewage backups into homes and businesses. Overflows are predominantly a stormwater management issue and driven by rain events. Development of impervious surface can contribute to additional CSO events, but sanitary connections to are not significant drivers of additional overflows.

Cambridge. MA CSO abatement website:

<https://www.cambridgema.gov/Services/combinedseweroverflows>