

October 25, 2024

Mr. Matthew Pawlik
Environmental Engineering Program Supervisor
CT Department of Public Health
Code Advisory Committee
410 Capitol Avenue
Hartford, Connecticut 06134

Re: Revisions to the Technical Standards for Subsurface Sewage Disposal Systems

Dear Mr. Pawlik:

The Capitol Region Council of Governments (CRCOG) works to enhance the quality of life, vibrancy, and vitality of the Greater Hartford region. CRCOG provides planning, programs, and services to our 38 member municipalities and we are the region's designated Metropolitan Planning Organization (MPO). CRCOG is a strong advocate for the region and regional solutions.

As the Code Advisory Committee determines potential revisions to the Technical Standards for Subsurface Sewage Disposal Systems, CRCOG urges the Committee to consider revisions to certain provisions related to ion exchange units.

We recognize the current revisions are focused on implementing recent legislative changes, but view this as an opportunity to address an emerging environmental and public health issue occurring in the Capitol Region. You may be aware of on-going well water contamination issues, potentially due to discharge from ion exchange units (water softener systems) in the town of Tolland and other localities around the state. While the Town, DPH, DEEP, and the affected residents continue to work on solutions for that particular situation, we see an opportunity to strengthen the technical standards for the systems to reduce the risk of future contamination to well water and sensitive water bodies.

Specifically, we suggest the following revisions to **Section X, Water Treatment Wastewater (WTW)**:

- **Section X.1** - Require the submittal of a water test with applications to the local health department as part of the review and approval process for WTW design plans. The Eastern Highlands Health District currently includes the submittal of a water test on its plan review application and has found in some cases the test results demonstrate no need for the use of an ion exchange unit. Reducing the installation of unnecessary water treat systems can reduce the risk of future contamination.
- **Section X.3** - This section allows for reductions in separating distances due to “site limitations.” We have heard from Health Directors in our region that some residents have sought reductions based on preferences, rather than site challenges. We would welcome stronger language since adequate separation distances play a critical role in reducing the potential for contamination. Stronger language also provides for more uniform interpretation among local health departments and for clearer guidance to applicants and installers.

We appreciate your consideration of our suggested revisions and would be happy to discuss this further with the Committee. I can be reached at mhart@crcog.org.

Sincerely,



Matthew W. Hart
Executive Director

CC: Robert Miller, Eastern Highlands Health District
Jennifer Kertanis, Farmington Valley Health District
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