



June 1, 2020

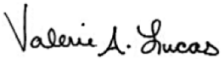
Dear Representative Zachary:

Clean Water Professionals of Kentucky & Tennessee is aware that the Tennessee General Assembly is considering HB 2206/SB 2224 that, as proposed, appears to limit TDEC's oversight of sewage disposal from land application sewage disposal systems. This category of wastewater systems presently serves thousands of residences in communities across the state, and surely more land application systems will follow for the foreseeable future.

We have concerns that HB2206/SB 2224, as proposed, would be dialing back proper regulatory oversight of these systems during the design and construction phase, and without the appropriate oversight and approval, could pose an increased risk to public health. Properly constructed infrastructure requires expert input and collaboration representing the perspectives of owner, engineer, operator and regulator. Allowing this productive input and oversight during design and construction, provides better results for both citizen and environment. While the bill as currently written provides oversight of the operator, a world class operator will not be able to properly maintain and operate an improperly constructed sewage disposal system.

Our association represents hundreds of members in Tennessee from utilities, industries, academia, consulting firms and manufacturers, all dedicated to safe and clean water through education, innovation and advocacy. We think it would be helpful to have more input and discussion on this legislation before it becomes law so that many of the water professionals across Tennessee could weigh in and help craft appropriate legislation that would accomplish what the bill is trying to achieve while still being protective of the citizens that utilize these systems. We know new subdivision construction will last a short time, but its impact on our communities and health of TN waterways will last a lifetime. We would be happy to have someone from our association meet with you and other interested parties. Feel free to contact me if you would like to discuss.

Sincerely,


Valerie A. Lucas, PE
Executive Director, CWP-KT


Saya A. Qualls-Hickey
TN Government Affairs Chair



About Clean Water Professionals of Kentucky & Tennessee (CWP-KT), formerly KY-TN Water Environment Association: CWP-KT is a Member Association (MA) of the national Water Environment Federation (WEF). WEF is a not-for-profit technical and educational organization of 34,000 individual members and 75 affiliated Member Associations representing water quality professionals around the world. Since 1928, WEF and its members have protected public health and the environment.

CC: Senator Steve Southerland
David Salyers, TDEC Commissioner