

Sewage Right-to-Know (SRTK) FAQ

SUBSCRIBER AGREEMENT

Q. What does DEEP need and where do I send it?

A. DEEP needs only 1 cover, transmittal, and form D with all of the form Es submitted.

- Scan and email a copy to DEEP.SRTK@CT.GOV
- Keep the original for your records.

Q. Who is the signatory authority?

A. The Chief Elected Official (First Selectperson, Mayor, etc) OR the WPCA Chairman is the signatory authority. The exception would be if the utility is wholly owned separately ("independent company") from a municipality with a president, chairman or chief executive officer, then that person would also be acceptable. These people would fill out and sign Form D (Signatory Authority).

Q. I am the Chief Plant Operator, should I be a subscriber?

A. If you will be reporting SSOs, Plant bypasses, effluent violations, mechanical equipment failures, CSOs, etc, then you would be a "subscriber" and would need to fill out Form E (Subscriber Signature).

Q. Can I have more than one subscriber?

A. Yes, you can have as many as you need. Each subscriber would fill out a Form E. They can all be submitted together in one package with the cover, transmittal and Form D (Signatory Authority).

Q. I have only a collection system, do I have to fill out a subscriber agreement?

A. Yes. CT Gen Stat § 22a-427 states "No person or municipality shall cause pollution of any of the waters of the state or maintain a discharge of any treated or untreated wastes in violation of any provision of this chapter." CT Gen Stat § 22a-424a (a)(1) defines "Sewage treatment plant or collection system" means any sewage treatment plant, water pollution control facility,

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related pumping station, collection system or other public sewage works; and (2) “Sewage spill” means the diversion of wastes from any portion of a sewage treatment plant or collection system in this state that reasonably initiates public health, safety or welfare concerns, or environmental concerns. CT Gen Stat § 22a-424a (c)(2) states “On and after July 1, 2018, not later than two hours after becoming aware of any sewage spill, the operator of a sewage treatment plant or collection system shall submit an electronic report to the Department of Energy and Environmental Protection.”

Q. What is my collection system Permit ID?

A. Currently, collection systems do not have one – leave that blank for now.

Q. I am an industrial wastewater permittee, do I need to fill this out?

A. No. Industrial permits are regulated differently. If you are on the municipal wastewater listserv and received the forms, that is because the listserv is intended for municipal wastewater producers only.

Q. Should the Email address and username be the same for all subscribers?

A. No. We are moving to a unique username / password system.

Q. Should I pick my username now?

A. Usernames and initial passwords will be assigned by the system. You will receive an email once you have been inputted and made “live” in the system.

NEW DOWNSTREAM REPORTING REQUIREMENTS

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Q. How would you like us to go about notifying the Chief Elected Official (CEO) and local public health officer? What if we have an issue in the middle of the night? I cannot guarantee to I can actually get ahold of anybody.

A. The notifications that need to be made per the bill are not "regulated" as to how the Chief Elected Official (CEO), or their designee, and public health official(s) are notified. DEEP understands that you may not be able to get ahold of the Mayor and/or the public health official, but you need to document how and when you made the attempt(s) (there will be a spot on the new form as well for this information). It is extremely important for larger bypasses that a human is reached. DEEP recommends discussing this process with the chief elected official(s), their designee(s) and local health officials to determine the best way contact them after hours.

Q. Who do I have to notify?

A. The legislation, effective October 1, 2021, requires operators, not later than two hours after becoming aware of a spill, to notify the Chief Elected Official (CEO) and local health official of the municipality where the spill occurred AND the CEO and local health official of any downstream municipality that may be impacted. Remember this is for any sewage spill or permitted sewage bypass that reaches a water body or may come in contact with the general public.

Q. So am I required to report CSOs to downstream officials?

A. Yes. The legislation reads: "...not later than two hours after becoming aware of any sewage spill or permitted sewage bypass that reaches a water body or may come in contact with the general public, ..." Permitted bypasses include combined sewer overflows (CSOs) and permitted bypasses of secondary treatment.

Q. What is meant by "comes in contact with the general public"?

A. Discussion between DEEP and Senator Cohen have defined these to mean large spills that the general public might come in contact with. Examples would include spills on trails or other areas not by water such as a pump station or force main in the woods. This does not include

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basement backups or manhole burps. Remember, you would have to notify the CEO and local health official of the municipality where the spill occurred AND any the CEO and local health official of any downstream municipality that may be impacted.

Q. Am I required to notify the general public of spills/bypasses?

A. No. This requirement falls the chief elected official (CEO) and local director of public health to jointly determine how to notify the public in their municipality.