

I attended the nonpoint source meeting in November. It was apparent from the data presented that impaired water bodies were almost entirely impacted by treatment plant discharges and in limited instances agricultural activities. Based on the data presented, the focus should be on addressing these point discharges, on preventing additional flow into these discharges and on not creating more point source discharges. The soil is nature's filter and it should not be bypassed.

Septic systems were reportedly not part of the phosphorus problem; except possibly in a few lake communities. Where lakes are impacted by phosphorus from septic systems, the most likely cause is that septic systems are installed without adequate separation to the water table. In this case, the most cost effective solution is to construct septic systems that meet current regulations with respect to separation distances to the water table. Studies have also shown that shallow leaching systems are most effective in treating phosphorus. Shallow leaching systems should be utilized when appropriate in phosphorus sensitive settings. Sewering of these areas removes water from the watershed, creates phosphorus pollution at a point discharge and is not cost effective; these should be avoided whenever possible.

Stormwater soil treatment/recharge systems should not be sited so as to negatively impact septic systems and associated down gradient treatment processes. The soil is effective in treating phosphorus, this is why stormwater is directed to soil infiltration systems in the first place; however, stormwater treatment should not diminish treatment of septic systems by increasing groundwater velocity, raising water tables, etc.

Sincerely,

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