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**Federation of Citizens Associations
Of the District of Columbia
P.O. Box 60622
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**TESTIMONY OF THE FEDERATION OF CITIZENS ASSOCIATIONS
BEFORE THE COMMITTEE
ON GOVERNMENT OPERATIONS AND THE ENVIRONMENT
ON THE DEPARTMENT OF THE ENVIRONMENT
MONDAY, MARCH 1, 2010**

Good Morning, Chairperson Cheh. My name is Gale Barron Black, and I am a member of the Executive Board of the Federation of Citizens Association. I have been authorized by the Federation to offer this testimony. We want to stress the importance of ensuring water quality in the District. As the former head of the DDOE George S. Hawkins said "water and sanitation are services that are fundamental to the operation of our civilization." We have an unprecedented opportunity to finally address one of the District's serious environmental issues.

We urge you to take the necessary steps to minimize the overflows of untreated sewage and other contaminants from the combined sewer and storm drain systems. This effort should be for the benefit of the third of the city that still has the combined storm drains. We need to implement the necessary fixes for the rest of the city to have an effective, reliable means to control storm drain run-offs and remove solid waste and dispose of sludge.

As you may know, a serious source of pollution exists in the southeastern portion of Rock Creek Park where there is an antiquated system of combined sanitary and storm sewers. Under normal conditions, the flow in these combined sewers is routed to the Blue Pains municipal wastewater treatment plant. However, during storms when rainfall (or melting) exceeds 0.3 inches per hour, these sewers overflow and discharge raw, untreated sewage directly into Piney Branch and Rock Creek.

DC operates a combined sewer system that has a total of 58 outfalls. There are 29 combined sewer overflows that discharge to Rock Creek and Piney Branch Creek alone. Together, the ones along Rock Creek Park can contribute as much as 42.5 million gallons of combined storm water and sewage to the creek during a one hour storm event.

We are concerned that DC sought a permit (EPA Permit DC 0021199) to allow the city to discharge more pollutants into the Potomac River and Rock Creek. This was seeking variances from the requirements of the National Pollutant Discharge Elimination System and / or the Clean Water Act. Instinctively, it does not seem like permitting any additional discharges into the water bodies is a wise or healthy move. It certainly is not in the best overall interest of all of us District residents.

We understand that the waters of DC are supposed to be free from substances attributable to sewage and which are harmful to people, plants and aquatic life. Yet, the waters are reported as impaired.

Nevertheless, we have been told that our drinking water is safe because it meets all federal EPA standards. Even if we believed this, it begs the question (safe for what and whom). The federal agencies have acknowledged that there are many contaminants that are not monitored. The unregulated contaminants could impact infants and seniors. Many people also do not realize that what goes down the drains enters the receiving waters. So what we ingest (including all the medications) goes into a combined sewer system.

According to a Drinking Water Quality Report, there are many unregulated contaminants, which included sulfate, nickel, lithium, magnesium, potassium, strontium, vanadium and zinc. Other chemicals that continued to be studied include naphthalene (used in rocket fuel), trichloroethylene ((likely to produce cancer in humans and a contaminant in soil and water), and Royal Demotion Explosive or RDX (chemical used in munitions, possible human carcinogen and known to leach from soil to groundwater).

Even if they were regulated, DC has an old distribution system, prone to leaks. It bears repeating that the sewers carry raw, untreated sewage that can pollute park waters when leaks develop. So, ground water contamination is also important. In upper Rock Creek, high bacterial concentrations are suspected to originate from sewer leaks. The presence of e coli bacteria in aquatic environments indicates that the water has been contaminated with the fecal material of humans or other animals and indicates that a potential health risk exists for individuals exposed to the water. The Long Term Control Plan controls were supposed to reduce the level of bacteria to avoid potential health threats.

Are we doing enough? The city plans to rehabilitate the pump stations to ensure that the stations are working properly and have adequate capacity to convey combined flows through the collection system to wastewater treatment plant. There are collectors to control the flow of sewage and to prevent it from flowing into the streams and streets. As we understand it, the modified Long Term Control Plan (now referred to as Water Quality Based Requirements for Combined Sewer System) states "All combined sewer flow stored in the Anacostia River, Northeast Boundary, Piney Branch and the Potomac River storage tunnels shall be emptied in such a manner as to maximize complete treatment at Blue Plains and to optimize conditions for maintaining the availability of storage volume in the tunnels system." May 22, 2009 DC Register. So, that sounds like the water will be dumped. If so, where? What are the health risks to the receiving areas?

In the May 22, 2009 DC Register, there was a Notice of Emergency Rulemaking which was "necessary to preserve the public safety of persons" swimming in the Potomac River during the 2009 Dextro Energy Triathlon ITU World Championship Services in June and in September. That emergency action was "to prevent threats to their health, safety and welfare as a result of their being exposed to contaminants or conditions outside the District's standards and criteria for Class A waters set forth in 21 DCMR Section 1104."

Swimming in the Potomac is one thing. What about exposure by walking in the Parks near the creeks or outfalls?

Plus, if we are to have an effective emergency preparedness plan, the city needs to address the 18 environmental hazards that were identified. Flooding and sewage were among those hazards. Water-borne contaminants are a serious issue. We wonder if enough is being done to address this situation.

We also need to address other issues, like non-native fish and plants, and the leaking underground storage tanks. A few years ago, this issue (leaking underground tanks) came to light in Riggs Park. Some Federation members learned of the presence of the underground tanks throughout northwest when a list of such tanks was presented as part of a road reconstruction project. The safe use of pesticides is another critical issue. More enforcement is needed.

We know that sustainability and going green became a mantra for many. While LEED designations, a few green roofs, and rain gardens certainly could contribute to curb run-offs, there are urgent reasons for this Council to make water quality and investment in our public health a priority. It's time to seriously address DC's environmental issues by addressing our infrastructure needs. It's overdue and a necessary proactive investment in our future, if we want to stay a world class city.

Finally, as residents of DC, we are being required to pay many new add-on fees. Are those fees being used to effectively make the environment safer for all of us? Please examine what is being spent and where. Is this the best use of our dollars? Are we taking effective action?

We are all connected and impacted by the environment. Hopefully, 2010 will be the year that the city takes a strong leadership role in addressing our decaying infrastructure to improve water quality for all of us.

Thank you. On behalf of the Federation, I ask that this statement be made a part of the record.