

CANDICE S. MILLER  
10TH DISTRICT, MICHIGAN

WASHINGTON OFFICE:  
320 CANNON HOUSE OFFICE BUILDING  
WASHINGTON, DC 20515  
(202) 225-2106  
FAX: (202) 226-1169

DISTRICT OFFICE:  
48701 VAN DYKE AVENUE  
SHELBY TOWNSHIP, MI 48317  
(586) 997-5010  
FAX: (586) 997-5013



Congress of the United States  
House of Representatives  
Washington, DC 20515-2210

September 6, 2016

The Honorable Gina McCarthy  
Administrator  
U.S. Environmental Protection Agency  
1200 Pennsylvania Avenue, NW  
Washington, DC 20460

Dear Administrator McCarthy:

The purpose of this letter is to provide input on regulatory action the Environmental Protection Agency (EPA) plans to take regarding public notification requirements for combined sewer overflows (CSOs) to the Great Lakes. I appreciate the EPA's attention to this serious environmental issue to the Lakes and welcome the opportunity to offer insight based on my experiences as a lifelong Michigianian.

In establishing an effective public notice requirement for CSOs, one of the most important first steps is to clearly, and in detail, provide the public as much information as possible – dates and times of discharge, location of discharge, volume of discharge, description of any immediate impacts of discharge, such as health implications, beach closures, and impact on water supply and property. Timeliness of information is also critical in these situations. With today's modern technology, there is no excuse for lag time in informing the public about CSOs. For example, there can be text alerts and real-time updates to websites tracking the spread of the CSO. Additionally, there can be more traditional alerts, like the color-coded system for abducted children or missing elderly, that appear on automated highway billboards. There is no amount of information that is excessive for the public to know. The public can often serve as the first line of defense in these situations so making them aware of the CSO as soon as it occurs will also be beneficial to the entities responsible for remediating the situation.

Another notification protocol, that may be more costly on the front end but can recoup the benefits on the back-end, is to implement real-time water quality monitoring devices at the water intake plants. This would be an additional alert system that would signal when various contaminants are introduced into the waterways, including sewer overflows. By providing for better testing at various sites along the shoreline of the Great Lakes, communities will have better opportunity to identify pollutants and their sources so they can address them before too much time has passed.

While a strong public notification system is useful in protecting communities from the harmful impact of CSOs, what is even better is preventing CSOs from occurring altogether. One way to do this is to work harder to separate municipal wastewaters and surface run-off. The separate

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collection prevents the overflow of sewer systems and treatment stations during rainy periods. Too many communities discharge regularly without this separation and it creates an environmental, logistical, and budgetary nightmare for them. Strong guidance from the EPA on this matter would send a message that these communities need to be more responsible and proactive in protecting their drains and waterways. The EPA should also provide strong guidance to repeat offenders who do not separate their collection systems – having them submit a plan on how they will work towards implementing this separation and perhaps not making them eligible for federal grants if they continue to engage in this reckless practice.

Currently, there are 184 communities with combined sewer systems in the Great Lakes region. These are communities of different sizes. Regardless of the population, there needs to be a common goal and political will to have a plan of action to address and eventually eliminate CSOs which foul our drinking water, cause beach closures, generate muck build up along our shorelines, and leave a pungent odor in its wake. It is incumbent on the EPA to offer best practices and a focused, coordinated approach that requires the states, counties, and local municipalities to work together on so many of these water quality issues. A lack of coordination is seriously impeding our ability to effectively address these issues. I look forward to the regulations the EPA puts forward on proper public notification requirements for CSOs to the Great Lakes and encourage the agency to also look at ways to prevent CSOs completely.

Sincerely,



Candice S. Miller