



April 22, 2021

Honorable Stacy Brenner, Senate Chair  
Honorable Ralph Tucker, House Chair  
Joint Legislative Committee on Environment & Natural Resources  
100 State House Station  
Augusta, ME 04333

**Re: LD 676, An Act to Reclassify Part of the Androscoggin River to Class B**

Senator Brenner, Representative Tucker, and members of the ENR Committee:

The Lewiston Auburn Water Pollution Control Authority (LAWPCA) appreciates the opportunity to provide the following testimony neither for nor against LD 676.

**About LAWPCA-** The Lewiston Auburn Water Pollution Control Authority was created by an act of the Maine Legislature in 1967 to provide wastewater treatment services to the Cities of Lewiston and Auburn. The plant started operation in 1974 and was one of the first secondary wastewater treatment facilities in the State of Maine. Our mission is to serve the public by protecting and enhancing the Androscoggin River water quality.

**Discussion-** We are proud of our efforts over the past 45+ years which have contributed to the drastic improvement of the Androscoggin River. We are also delighted to hear that the river is meeting Class B standard nearly all of the time and that reclassification to such a standard is even being discussed on a river that served as the impetus for creation of the Clean Water Act nearly 50 years ago. We are, however, concerned about the potential discharge license permit implications as a result of a reclassification. Although reclassification is a goal of the legislature, The DEP has legal requirements to ensure 100% attainment of any reclassification through permitting means on all dischargers on the Androscoggin. Additionally, EPA has ultimate oversight on these permits, meaning discharge permit impacts, and public cost impacts are truly unknown at this time and subject to interpretation. The Cities of Lewiston and Auburn have made and continue to make, significant investments in their wastewater treatment infrastructure, including Combined Sewer Overflow (CSO) abatement. We are currently facing infrastructure needs over the next 2-5 years of approximately \$10 Million to address biosolids PFAS impacts, and another \$25 Million to build a CSO storage tank. While we support the recognition of improved water quality, we also worry that the regulatory burden to comply with such a reclassification could add additional financial burden to the citizens of the twin cities. Additionally, any reductions in our permitted discharge have the potential of impacting future community and business growth, which appears to be counter to some of this bill's intent.

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We are in the business of cleaning water and improving river quality so we will continue to do whatever is required of us. However, we request that before setting such a goal, that the legislature ensure that the new standards are attainable and that the full cost impacts are understood and made transparent. Ideally, the DEP would be able to ensure that Class B standards in the lower section of the Androscoggin River are reasonably and technically feasible to attain, and that the cost to do so is negligible for all impacted communities, creating a win for all interested parties, including those that live, work, and recreate on this wonderful river.

**Conclusion-** LAWPCA largely supports the intent of LD 676 and recognizing the tremendous improvements made to Androscoggin river water quality. We strongly support all efforts to provide the best water quality reasonably possible throughout the State of Maine: however, we are concerned with the unknown regulatory requirements that will become legally binding on our facility as a result of reclassification, the practical attainment of the new water quality requirements, and the lack of transparency with the public on what the costs associated with such an attainment would be.

Thank you for your time and attention.

Sincerely,



Travis Peaslee, P.E.  
General Manager  
Lewiston Auburn Water Pollution Control Authority