

**Written Testimony Regarding
Opposition to House Bill 216
Environment – Salt Applicator Certification Program – Establishment**

From the desk of:

F Edward Harrison, Jr

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Occupation: Onsite Wastewater Operation and Maintenance Provider

Apposed to this Bill

[My opinion on this legislation reflects my opinion and mine alone, and not of any organization or group that I may be affiliated with]

I am completely in support of reducing salt pollution in our State. This is a very large issue that is in dire need of addressing. But this Bill will do little, if anything, to reduce the effects of salt pollution on the environment in Maryland.

I have been pushing snow for most all of my 63 years on this planet. I was raised on a farm in rural Maryland with the task of keeping our roads, pathways, and other areas, needed for work, cleared of snow. Along with plowing neighbor driveways. Working construction my entire career, my employers utilized me to operate snow removal equipment of various types. When I started my own contracting business in 1993, a construction and excavating business, in the winter I hired out myself, and my equipment, to another contractor to push parking lots in Westminster, Owings Mills, Baltimore City and Columbia. I obtained my own contract pushing snow and salting for Carroll County Roads from about 1995 to 1999. I pushed snow and salted for Verizon in 2000 for another contractor. I then obtained a contract with the Maryland State Highway Administration from 2001 thru 2017, pushing snow and salting. During my time contracted by the State, for a few years, I also provided operators and equipment to push snow in the Columbia Mall and Montgomery County Department of Transportation. As you can see, I have extensive experience in snow removal operation. I have since gave up plowing snow to pursue other ventures.

I have been concerned about this subject for many years. Seeing how salting practices are implemented during my experiences in the snow removal field. Also, being in the Onsite Wastewater Industry and being enlightened to the well contamination issue from road salt.

This Bill will do very little to mediate salt pollution. Contractors that do snow removal on most private properties (IE: parking lots; shopping centers; HOA streets; and other commercial, privately owned, roadways and pathways) are regulated by the property owner. Most property owners monitor the amount of salt applied to their property, due the heavy cost of salt. The price of salt, delivered to the property, can be in excess of \$100 a ton. The way most private lots are handled; they are to clear the road first, then apply a little salt to melt what is left. (This is not ALL cases, but most) Snow removal is a nuisance expense for the property owner and they hate paying any more than they have to.

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There are some property owners, usually the properties owned by larger corporations, that will splurge on salt for liability protection. They calculate that paying for salt is better than paying lawyers for “Slip and Fall” litigation. And, if they are willing to splurge on salt, I am pretty sure they would be willing to pay any fine associated with over salting. (Better dealing with the known consequence than the unknown consequence.)

The much larger culprit of over salting is the Municipal, County, and State entities. The individuals managing these operations don't have to pay for the salt, the tax payer does. In the preamble to the snow season, a public entity will make all drivers attend a class in proper plowing and salting techniques. They will inspect and calibrate the trucks, give each truck a sheet of paper showing what setting to put the dial on in consideration of truck speed and pounds per lane mile that you are told to spread. Some trucks are equipped with remote monitoring of salt application. Then they measure all of the salt loaded on each truck, and how much is dumped off after each event. This all works very well during the first snow event of wet snow, freezing rain and/or light accumulation. But, when the real snow hits, or longer freezing precipitation events occur, all of the previous procedures are thrown out the window. It becomes about "Public Safety" and the orders are: "Turn it up!" and “Put it down”. God forbid snow starts to accumulate on one street and not another. Citizens start calling their representatives, the representative calls the highway department, the highway department (Knee jerks) and puts out the directive to "Put it down".

The real problem is culture. In Northern States people stay home until the event is over and give the crews time to clear or groom the roads. In today's society (and especially the metro Balt., DC corridor), the public wants instant results and do not accept an inconvenience in their way of life due to weather. "That's what I pay taxes for".

Certifying private contractors that do snow removal on private property would just add another layer of burden on private industry.

After watching testimony of the Sponsor, Delegate Qi, I would like to address some of the points she brought up:

- She speaks of “Piles of Salt” on the roadways. This is on roadways, public entities (SHA, Counties, Towns, etc.) are responsible for those piles, not private contractors salting parking lots. My experience, these piles come from minor equipment failure and the supervision within the public agencies are very stern in enforcing the cleanup of such piles.

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- “Salt is cheap.” I guess this all up to perspective. End users in the private industry (Snow removal customers) are paying \$100 per ton, or more, delivered to their parking lot. This, compared to other aggregates hauled on dump trucks, gravel is about \$20 per ton, sand is about \$35 per ton, and blacktop is about \$85 per ton, delivered to a job site.
- With regards to the testimony of the Chesapeake Bay Foundation and Delegate Qi, I concur that after some freezing precipitation storms, you see the roads white with salt. This always troubles me. But these are public roadways, not parking lots. There are way more paved roadways under public maintenance than there is private roadways, sidewalks, and parking lots. In the CBF testimony, he alluded to the contaminated wells were next to public roadways. Salt over-use is perpetrated by public entities in levels that are, leaps and bounds, over what private contractor use is.
- Another question that was raised, salt alternatives. I am no expert, but I have been told that there are no chemicals that work as well as salt. And, alternative chemicals come with a hefty price tag and limited availability. (This may be where the narrative “Salt is cheap” comes from.) And do we really want to introduce a different chemical into our ground water system, to realize, 20 years from now, it too is contaminating our water. There are more environmentally friendly alternatives, like sand and cinders, material they use in more snowy climates, but these make a mess along the sides of the roads and runoff into our streams, as well.

I also thank Delegate Qi for her concern on this issue. It is a very dire situation. I just feel, with this legislation, we are spraying a garden hose onto a fully engulfed house fire. We are not addressing a true solution to the problem.

What needs to be done is to start a process to change the public policy on what we call “Black road policy”. Where the public expects our roads to be navigable regardless of what Mother Nature throws at us. Until we address that, our wells will continue to be contaminated.

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