



Connecticut Chapter
P.O. Box 270595
West Hartford, Connecticut 06127
connecticut.sierraclub.org

September 22, 2020

CT DEEP, Office of Adjudications
79 Elm Street
Hartford, CT 06106
Attn: Brendan Schain

Dear Mr. Schain,

On behalf of Sierra Club's more than 40,000 members and supporters in Connecticut, thank you for providing this opportunity to comment on Application No. 201615592 by NTE Connecticut, LLC for a permit to discharge industrial wastewater associated with steam electric power generation operations at 189 Lake Road, Killingly, Connecticut.

We urge the Department of Energy and Environmental Protection (DEEP) to reject this application. Analysis¹ by Synapse Energy Economics shows that the gas plant that will discharge the wastewater that is the subject of this permit is not needed even considering potential retirement of so-called "at risk" power plants. Given that the electric capacity from this plant is not needed at present, and that the state must begin phasing out electricity from fossil fuels to comply with the GWSA and to reach Governor Lamont's 100% carbon-free power by 2040 target, DEEP would needlessly be allowing the discharge of wastewater contaminated with pollutants including ammonia, copper, lead, oil, nickel, phosphorus and zinc. Protecting Connecticut's water should come before an unneeded power plant.

Wastewater will be treated at the Town of Killingly Water Pollution Control Facility and then discharged into the Quinebaug River. Despite being treated, the wastewater will still contain harmful pollutants. The health of the Quinebaug, a river that has already experienced legacy toxins from industrial pollution, should not be sacrificed for this unneeded fossil fuel power plant.

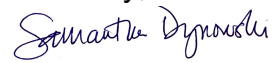
Furthermore, the application does not address perfluoroalkyl and polyfluoroalkyl substances (PFAs) that must be monitored in the wastewater being generated by this power plant. These chemicals are persistent, bioaccumulative, and toxic to people and animals. They can't be broken down and cause irreversible damages. Wastewater will be generated from a number of sources including cleaning equipment and drains. In the future, the Town of Killingly Water Pollution Control Facility may be required to treat for PFAS. DEEP's permitting process should require PFAs monitoring to ensure that PFAs treatment does not fall solely on the rate payers and local tax revenue.

¹

https://portal.ct.gov/-/media/CSC/1_Dockets-medialibrary/Docket_470B/Prefiled_exhibits/grouped/DO470B20190411NAPPSCTestimonyFaganGlickpdf.pdf

Thank you for the consideration of our comments, and your attention to these issues.

Sincerely,

A handwritten signature in blue ink that reads "Samantha Dynowski". The signature is written in a cursive, flowing style.

Samantha Dynowski, State Director
Sierra Club Connecticut