



SIERRA CLUB

Connecticut Chapter
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Jun 16, 2021

To Whom It May Concern:

On behalf of Sierra Club and our 40,000 members and supporters here in the state, we appreciate the opportunity to testify in opposition to Wheelabrator's permit applications, modifications, and 401 certification referenced below to expand the Putnam Ash Landfill. This expansion is dangerous to the residents and environment of Putnam and surrounding areas, and it is not necessary for current and future Connecticut waste disposal needs.

Referencing applications for:

SOLID WASTE PERMIT - Pursuant to CGS Section 22a-208a.

Application No. 201903454

Permit ID No. SW-1160391 (Permit to Construct) and 1160430-PO (Permit to Operate)

SECTION 401 WATER QUALITY CERTIFICATION – Pursuant to Section 401 of the Federal Clean Water Act

Application No. WQC-201903463

PERMITS FOR THE FOLLOWING DISCHARGES INTO THE WATERS OF THE STATE OF CONNECTICUT - Pursuant to CGS Section 22a-430

1. Permit to Discharge into the Sanitary Sewer

Application Nos. 201500823 and 201903451

Permit ID No. SP0002303

Receiving Waters Name and Location: Quinebaug River via Putnam Water Pollution Control Facility ("WPCF")

2. Modification of Permit to Discharge into the Groundwater

Application No. 201903452

Permit No.: LF0000055

Facility No. 116-068

Receiving Waters Name and Location: Groundwater adjacent to the Quinebaug, River, Putnam, Connecticut

The application is to expand the existing sixty (60) acre ash residue landfill by an additional sixty eight (68) acres over the next 25 years. This expansion would stretch into woodlands and open space adjacent to the Quinebaug River. Wheelabrator has also requested the groundwater quality rating under the landfill be downgraded. This groundwater discharges in the Quinebaug River.

Sierra Club Connecticut objects to the expansion of the Putnam Ash Landfill for the following reasons:

- 1) We have serious concerns about the public health of the area and how it will be impacted by the ash landfill for another 25 years. Incinerator ash is highly toxic and landfills have historically had problems with leakage.



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- 2) This landfill would be right next to the river and we are concerned about the water quality. The permit asks for a downgrade of the groundwater underneath the landfill, which discharges into the Quinebaug. How long before the river quality is downgraded as well? The Quinebaug's condition in Putnam is already designated as impaired for aquatic life.¹ The Quinebaug River Trail, a designated National Recreation Trail, goes right through Putnam. The people of Putnam deserve a safe and healthy river for boating, fishing, and other recreation. The proposed expansion threatens this.
- 3) This landfill expansion proposal is also counterproductive to the Governor's and DEEP's goal of providing healthier drinking water and protecting the health of residents. State agencies plan to begin testing more drinking water and waterways for PFAS and other contaminants. To allow this expansion, which will impact groundwater, destroy wetlands, and potentially pollute with PFAS and other contaminants from waste incineration is not in line with these goals.
- 4) There is also no need for this expansion to the landfill to fulfill Connecticut's needs. The biggest incinerator in the state (MIRA in Hartford) is set to shut down in 2022. Statute clearly states that landfill expansion should be based on need for Connecticut.² The list on the permit application states that their plan for expansion is based on getting ash from out-of-state incinerators. They receive ash from an out-of-state incinerator currently. Putnam and the surrounding areas should not have to bear the burden of regional ash.
- 5) Expanding the current system of waste management also goes against the goals of the Connecticut Coalition for Sustainable Materials Management, (headed by DEEP commissioner, Katie Dykes) that met this year and put forth recommendations. The Coalition's recommendations for significantly reducing our waste stream in Connecticut, if adopted and implemented, will negate the need for the landfill expansion. Sustainable, zero-waste solutions are what is needed, not more incineration.
- 6) The impacts of trash incineration and waste management in the state have historically been disproportionately borne by environmental justice communities. Putnam is considered an environmental justice community. To ask them to continue to bear this burden is unjust.

Thank you for your time and consideration of our testimony today. We strongly oppose this expansion to the Putnam Ash Landfill and urge you to reject the permit application.

Sincerely,

Ann Gadwah
Advocacy and Outreach Organizer

¹ <https://mywaterway.epa.gov/community/Putnam.%20CT/overview>

² https://www.cga.ct.gov/current/pub/chap_446d.htm#sec_22a-208d