



# SIERRA CLUB

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

Kathleen Reiser, Esq.  
Adjudicator  
Department of Energy and Environmental Protection  
Environmental Protection Office of Adjudications  
79 Elm Street  
Hartford, CT 06106-5127

Dear Ms. Reiser:

On behalf of Sierra Club and our over 40,000 members and supporters here in Connecticut, I thank you for the opportunity to comment on the following permit and modification of permit applications by Wheelabrator Putnam Inc. regarding the Putnam Ash Landfill Expansion.

**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)

**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

Sierra Club Connecticut opposes this project and the approval of the associated permits and modification of permits. This expansion is a danger to public health, water quality, and the environment. It also puts another unfair burden on the residents of Putnam and the surrounding areas.



Wheelabrator Putnam has applied to expand the ash landfill it currently operates in Putnam, which receives most of the ash from state incinerators and one from New York. The expansion would increase the landfill by 68 acres, bordering woodlands, wetlands and open space adjacent to the Quinebaug River. The permits also ask to modify the existing permit by allowing Wheelabrator to discharge into the groundwater adjacent to the river and to allow treated discharge into the sanitary sewer.<sup>1</sup>

Incinerator ash is highly toxic. It contains chemicals that may pollute our water and endanger our health. Even with “best practices” to contain the leachate, plastic liners and landfill covers will inevitably degrade, allowing leachate to seep into the soil and groundwater. The proposed expansion’s proximity to the Quinebaug river makes this particularly concerning for the health and safety of the river and drinking water.

One class of chemicals that is particularly concerning are PFAS, known as forever chemicals because they persist in the environment for thousands of years. PFAS are toxic to humans and been shown to cause low birth weights, immune system problems and certain types of cancers.<sup>2</sup>

PFAS are found in plastic products and packaging. Currently, only about 9% of plastics are recycled and the remaining are incinerated or landfilled. After incineration, the chemicals are then concentrated in the ash and trucked to ash landfills, like the one in Putnam. Peer-reviewed research has identified PFAS in leachate, fly ash, and bottom ash from solid waste incinerators.<sup>3</sup> Once it is introduced there, it could contaminate the wastewater, nearby wetlands, groundwater, and the Quinebaug River.

The legislature has recently passed a law that bans the chemicals from firefighting foam and certain food packaging. The state has also committed to testing 2,400 sites around the state for PFAS contamination. Allowing this expansion to the landfill and approving the permits for discharge into the groundwater and sewer system is counter to the state’s goals of monitoring and limiting exposure to the chemicals.

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<sup>1</sup> [https://portal.ct.gov/DEEP/Public-Notices/Public-Notices-Proposed-Actions---Opportunity-for-Comment/Proposed-Individual-Permits/Wheelabrator-Putnam-Inc-Putnam?utm\\_medium=email&utm\\_campaign=Jamie%20Dougherty&utm\\_content=Jamie%20Dougherty+CID\\_4a9e3625ea95b34350d731e737cd034a&utm\\_source=DEEP%20Campaign%20Monitor&utm\\_term=View%20Notice](https://portal.ct.gov/DEEP/Public-Notices/Public-Notices-Proposed-Actions---Opportunity-for-Comment/Proposed-Individual-Permits/Wheelabrator-Putnam-Inc-Putnam?utm_medium=email&utm_campaign=Jamie%20Dougherty&utm_content=Jamie%20Dougherty+CID_4a9e3625ea95b34350d731e737cd034a&utm_source=DEEP%20Campaign%20Monitor&utm_term=View%20Notice)

Environmental Justice (EJ)

<sup>2</sup> <https://www.epa.gov/pfas/basic-information-pfas>

<sup>3</sup> Shanshan Liu, Shiyi Zhao, Zhihong Liang, Fei Wang, Feiyun Sun, Da Chen, **Perfluoroalkyl substances (PFASs) in leachate, fly ash, and bottom ash from waste incineration plants: Implications for the environmental release of PFAS**, *Science of The Total Environment*, Volume 795, 2021, 148468, ISSN 0048-9697, <https://doi.org/10.1016/j.scitotenv.2021.148468>.  
(<https://www.sciencedirect.com/science/article/pii/S0048969721035403>)



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With the impending closure of the MIRA trash incinerator in Hartford and Connecticut's commitment to implementing better waste management solutions, like the recent expanded bottle bill and composting programs, the need for such a large expansion to deal with Connecticut's incinerator ash is not necessary. Wheelabrator's permit applications indicates the expansion is needed to potentially dispose of ash from all over the region.<sup>4</sup> The Putnam Ash Landfill should not become a regional landfill, where Connecticut residents pay the price with their health, water quality and environment.

For decades, Environmental Justice communities like Putnam have borne the burden of polluting facilities and industries. The area is already home to the current ash landfill, manufacturing plants, a gas plant, and a potential new gas plant in nearby Killingly. Expanding this landfill will put yet another unfair and unjust burden on the residents of the area, affecting their health and well-being for years to come.

I thank you for your time and consideration of our comments. We ask that the Connecticut Department of Energy and Environmental Protection reject these permits and stop the expansion of the Putnam Ash Landfill.

Sincerely,

Ann Gadwah  
Advocacy and Outreach Organizer

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<sup>4</sup> [https://portal.ct.gov/DEEP/Public-Notices/Public-Notices-Proposed-Actions---Opportunity-for-Comment/Proposed-Individual-Permits/Wheelabrator-Putnam-Inc-Putnam?utm\\_medium=email&utm\\_campaign=Jamie%20Dougherty&utm\\_content=Jamie%20Dougherty+CID\\_4a9e3625ea95b34350d731e737cd034a&utm\\_source=DEEP%20Campaign%20Monitor&utm\\_term=View%20Notice](https://portal.ct.gov/DEEP/Public-Notices/Public-Notices-Proposed-Actions---Opportunity-for-Comment/Proposed-Individual-Permits/Wheelabrator-Putnam-Inc-Putnam?utm_medium=email&utm_campaign=Jamie%20Dougherty&utm_content=Jamie%20Dougherty+CID_4a9e3625ea95b34350d731e737cd034a&utm_source=DEEP%20Campaign%20Monitor&utm_term=View%20Notice)