



May 22, 2020

Stephen Edwards
Bureau of Materials Management and Compliance Assurance,
Department of Energy and Environmental Protection
79 Elm Street
Hartford, CT 06106-5127

Re: APPLICATION NO. 201615592 PERMIT ID NO. SP0002475

Dear Mr. Edwards,

Thank you for extending the deadline to comment on the wastewater discharge from the proposed Connecticut NTE Killingly Energy Center to the Killingly Water Pollution Control Facility.

Section 4: Effluent Limitations and Monitoring Requirements

Effluent limits and monitoring requirements for perfluoroalkyl and polyfluoroalkyl substances should be included. It is our understanding that the majority of the discharge for cooling is not likely to contain PFAS chemicals. However, there are concerns with effluent from the floor drains. Requiring that NTE Connecticut monitor effluent for PFAS chemicals shields the publicly owned treatment works from being solely liable for PFAS effluent limitations from their own treatment facility should any permit limitations come about in the future. But most importantly, to ensure the health of the Quinebaug River which is of high recreational value. Connecticut NTE should bear the full cost of testing and be required to implement pre-treatment measures if it is found that the plant is responsible for the discharge of PFAS chemicals that threaten human and environmental health.

Sincerely,

A handwritten signature in blue ink, appearing to read "Alicea Charamut".

Alicea Charamut
Executive Director