



October 14, 2021

Office of Adjudications
DEEP Headquarters
79 Elm Street, 3rd Floor
Hartford, CT 06106

Re: Draft Permits
Application No. 201903451 & 201500823 Permit to Discharge to Sanitary Sewer
Application No. 201903452 Modification of Permit to Discharge to Groundwater

Thank you for the opportunity to comment on the draft permits referenced above.

Thank you for including conditions for sampling for PFAS substances in the draft Permit to Discharge to Sanitary Sewer. Rivers Alliance fully supports this inclusion if a final permit is issued.

However, the draft Modification of Permit to Discharge to Groundwater does not include a sampling requirement for PFAS. Landfill leachate is major source of PFAS substances found in ground and surface waters. While the chances and occurrence of release of PFAS chemicals from lined landfills is reduced, **this chance is not zero**. Our state agencies are currently investing in wide-spread testing in order to better understand PFAS contamination across the state. This is a financial burden that should not be bourn entirely by taxpayers. Sources that are known to be major contributor to PFAS substance contamination should be required to sample for PFAS if there is **ANY** chance of release, no matter how slight.

The proximity of the landfill expansion is of particular concern considering the proximity to the Quinebaug River and the existing operation to Carpenter Brook. The section of the Quinebaug River that flows past the landfill is a National Recreation Water Trail. National Water Trails have been established to protect and restore America's rivers, shorelines, and waterways; conserve natural areas along waterways; and increase access to outdoor recreation on shorelines and waterways. The Trails are a distinctive national network of exemplary water trails that are cooperatively supported and sustained. DEEP also stocks the Quinebaug River with trout just downstream of the landfill at Cotton Road and the Rt 101 boat launch in Killingly. The Department of Public Health had to put a prohibition on eating trout from the Farmington River from June 2019 to October 2020 due to two releases of PFAS substances in June 2019 and one in October of 2019.

DEEP must consider the protection of natural resources and without a condition that requires sampling groundwater and soil for PFAS substances in the Modification of Permit to Discharge Groundwater, the agency does not meet this obligation. We respectfully request that DEEP add this condition if it is issue a final permit.

Thank you again for the opportunity to comment.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Alicea Charamut', with a stylized, cursive script.

Alicea Charamut
Executive Director