



September 30, 2020

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

Re: NTE Connecticut LLC, Application No. 201615592

Dear Mr. Schain:

On behalf of the Connecticut League of Conservation Voters, thank you for the opportunity to comment on the Application No. 201615592 by NTE Connecticut, LLC for a permit to discharge industrial wastewater associated with steam electric power generation operations located at 189 Lake Rd, Killingly CT. We appreciate your consideration of some of the concerns we have with this permit.

We urge the Department of Energy and Environmental Protection (DEEP) to reject this application. The last thing Connecticut needs is more costly pollution. This power plant will not only cause filthy air pollution, but also irreparable water pollution. The dirty wastewater from this plant is likely to contain oil and heavy metals which would be treated at the Killingly water treatment plant and then discharged into the Quinebaug River. Despite being treated, the wastewater going into the river will still contain harmful pollutants. Protecting Connecticut's water should come before an unnecessary power plant.

This power plant is not only unnecessary but costly to our residents. We have made considerable commitments to clean energy and emissions reduction, but approval of this plant goes directly against Governor Lamont's Executive Order 3 to ensure a zero-carbon electric grid by 2040. It will increase our continued reliance on fossil fuels and is out of alignment with Connecticut's Global Warming Solutions Act goals. Investing in gas infrastructure when we already have renewable energy options in the pipeline will hurt our environment and our residents, and will hold Connecticut back from real solutions to climate change and resiliency.

Furthermore, this application does not address perfluoroalkyl and polyfluoroalkyl substances (PFAs). These chemicals must be monitored in the wastewater being generated by this power plant. PFA's are bioaccumulative, toxic to people and animals, and cannot be broken down. 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 these chemicals; and DEEP's permitting process should require PFAs monitoring to ensure that treatment for them does not fall solely on the rate payers and local tax revenue.

CTLCV strongly opposes this contract and hopes that DEEP will reject it. Thank you for the opportunity to submit comments on this important issue.

Sincerely,

Emily Alexander
Climate Policy Advocate
CT League of Conservation Voters
553 Farmington Ave, Suite 201
Hartford, CT 06105
860.236.5442