



# STATE OF CONNECTICUT

## CONNECTICUT SITING COUNCIL

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### VIA ELECTRONIC MAIL

January 7, 2015

TO: Parties and Intervenors

FROM: Melanie Bachman, Acting Executive Director *HAB*

RE: **DOCKET 192B-** CPV Towantic, LLC Motion to Reopen and Modify the June 23, 1999 Certificate of Environmental Compatibility and Public Need based on changed conditions pursuant to Connecticut General Statutes §4-181a(b) for the construction, maintenance and operation of a 785 MW dual-fuel combined cycle electric generating facility located north of the Prokop Road and Towantic Hill Road intersection in the Town of Oxford, Connecticut.

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Comments have been received from Department of Public Health, received January 7, 2015. Copies are attached for your review.

MB/cm

c: Council Members

STATE OF CONNECTICUT  
DEPARTMENT OF PUBLIC HEALTH

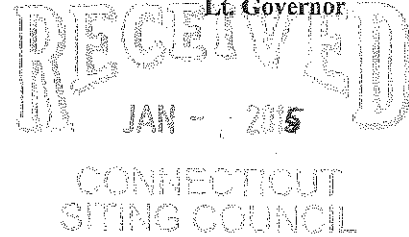
Jewel Mullen, M.D., M.P.H., M.P.A.  
Commissioner



Dannel P. Malloy  
Governor  
Nancy Wyman  
Lt. Governor

January 8, 2015

Melanie Bachman  
Acting Executive Director  
Connecticut Siting Council  
Ten Franklin Square  
New Britain, CT 06051



Re: Docket No. 192B CPV Towantic, LLC Motion to Reopen and Modify the June 23, 1999 Certificate of Environmental Compatibility and Public Need (CECPN) based on changed conditions pursuant to Connecticut General Statutes §4-181a(b) for the construction, maintenance and operation of a 785-MW dual-fuel combined cycle electric generating facility located north of the Prokop Road and Towantic Hill Road intersection in the Town of Oxford, CT  
DPH Project #2014-0271

Dear Ms. Bachman:

The Drinking Water Section (DWS) of the Department of Public Health (DPH) has reviewed the Motion to Reopen and Modify in the above noted Docket Number. This project is not within a public water supply source water area; therefore no environmental impacts to public drinking water sources of supply are anticipated. The Docket notes that this project does propose to connect to the Heritage Water Company (HWC, PWSID# CT1300021) public water system to obtain process water and drinking water, therefore the DWS offers the following comments:

- Because the proposed facility will receive water from HWC, it will be required to be constructed in compliance with the backflow prevention requirements specified in the Regulations of Connecticut State Agencies (RCSA) Section 19-13-B38a: "Permissible Arrangements for Connection to Public Water Supply Lines".
- HWC, per RCSA Section 19-13-B37, is prohibited from providing new water service to any site, which is not in compliance with RCSA Section 19-13-B38a.
- Note that per RCSA Section 19-13-B38a(f)(7) the owner and HWC will be required to have annual tests performed on reduced pressure principle backflow preventers, double check valve assemblies and pressure vacuum breakers that are installed at this site and that these tests shall only be performed by a person who is actively certified as a Connecticut DPH Backflow Prevention Device Tester,
- Note that per RCSA Section 19-13-B102(f), HWC will be required to perform inspections for cross connections, should any of the five categories of concern be known to exist at this site, and that these inspection must be performed by a person who is certified as a CT DPH Cross Connection Survey Inspector.
- The original CECPN notes that HWC has a limited supply of water available to provide to this project and that additional sources of supply will be required for HWC to maintain a long-term adequate margin of safety for its customers. In 2010, the DPH issued a sale of excess water permit to the Connecticut Water Company (CWC) Naugatuck Central Region (PWSID# CT0880011) to sell water to HWC, effective for ten years. While this permit alleviates the short term needs of HWC, the DPH indicated in its transmittal of Permit# SEW2010-01 that:

*"...the MMAD MOS [Maximum month average daily demand margin of safety for CWC] sometime soon after 2020 will fall below 1.15 and at some point between 2020 and 2050 will fall below 1."*



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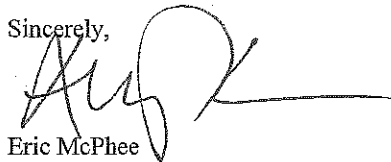
Ms. Bachman  
January 8, 2015  
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The DPH transmittal letter goes on to recommend that CWC consider locating appropriate sources and obtaining regulatory approvals well in advance of seeking renewal of the SEW permit in 2020.

- The facility has apparently been redesigned to include new technologies and improved environmental controls that have either become available or are required since the original CECPN was issued in 1999. Although it appears that in the new plant design, some water will be recycled and some equipment has been redesigned to not require potable water, the actual water demand of the facility has not changed and in some operational modes, it has increased. It is recommended that CPV Towantic LLC demonstrate that the facility they are proposing to construct minimizes the use of potable water and optimizes water conservation opportunities.

If you have any questions regarding this matter, please contact Pat Bisacky of this office at 860-509-7333.

Sincerely,



Eric McPhee  
Supervising Environmental Analyst  
Drinking Water Section

Cc: Raymond Adamaitis, Heritage Water Company  
David Radka, Connecticut Water Company  
Lori Mathieu, Public Health Section Chief, DWS