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AN APPLICATION BY TOWANTIC ENERGY, LLC : DOCKET NO. 192b
FOR A CERTIFICATE OF ENVIRONMENTAL
COMPATIBILITY AND PUBLIC NEED FOR THE
CONSTRUCTION, MAINTENANCE AND OPERATION
OF A PROPOSED ELECTRIC GENERATING FACILITY
LOCATED NORTH OF THE PROKOP ROAD AND : DECEMBER 18, 2014
TOWANTIC HILL ROAD INTERSECTION IN THE
TOWN OF OXFORD, CONNECTICUT

DRAFT PREHEARING INTERROGATORIES BY THE BOROUGH OF NAUGATUCK
AND
BOROUGH OF NAUGATUCK WATER POLLUTION CONTROL AUTHORITY

1. The Borough and the WPCA are affected by this proceeding in that the modifications proposed by the petitioner, CPV Towantic, LLC (“Towantic”) in its petition to reopen and modify the decision and order in docket no. 192b, may have significant detrimental effects on the operation of the WWTP and its ability to process and treat the unknown amount of effluent from the proposed dual-fuel combined cycle electric generating facility (the “Facility”).
2. It is an important objective of the Borough that is develops general municipal policies that encourage conservation and proactively address environmental issues and improve and protect air, water and natural resources above the current levels. In an effort to meet that objective, the Borough discourages, objects and actively resists efforts by

development, industry or other body to cause pollutants to be expelled into its air or into its water resources that may be deemed harmful to the environment and the general health and quality of life of its residents.

3. As an adjoining community to Oxford, the proposed location of the Facility, the Borough will be significantly affected by the air and water effluent from the Facility, and it is imperative that further study be done to determine the volume, quality and content of the effluent, so as to continue to protect and give meaning to the fundamental tenets of the Borough's policy on conservation, environmental responsibility, and the health and quality of life of its residents.
4. The Borough and the WPCA seek full rights as intervenors in this proceeding, including the rights to conduct discovery, introduce and review evidence, cross-examine witnesses, submit briefs and present argument. Towantic's motion to reopen and modify the decision and order in docket no. 192 proposes to make substantive changes, the effect of which will increase the net nameplate electrical output of the Facility from 512 megawatts to 785 megawatts. It is imperative that these proposed changes be fully and thoroughly examined and studied before the Council approves the modification.

5. The Borough and WPCA's participation in this proceeding is in the public interest, and good cause exists to grant this motion. The Borough and WPCA's participation will not impair the interests of justice or impair the orderly conduct of the proceedings.

Interrogatories:

1. Provide the original submissions to the Borough of Naugatuck Water Pollution Control authority from the previous application for a 512mw dual fuel combined cycle application and describe in detail changes from the original submission and certifications with the representations for the current 785mw dual fuel proposal.
2. Describe in detail and provide a map, with descriptions of the sewer line including inspection film depicting the scoping of the course and capacity of the lines by which the wastewater discharged to the Oxford municipal sewer system travels to the Naugatuck Wastewater Treatment Plant.
3. Describe in detail the chemical composition, quantity, kind, quality, nature and temperature of the effluent "grey water" proposed to be discharged to the Naugatuck Wastewater Treatment Plant when operating on Natural Gas at full performance and ULSD.
4. Describe in detail contingency plans for wastewater processing in the event that the Naugatuck Wastewater Treatment Plant is closed for emergency or maintenance or upgrade?
5. Does the effluent "grey water" override the plant and get discharged into the Naugatuck Wastewater Treatment Plant in the event of a treatment plan closing?
6. What is the temperature of the wastewater released into the Oxford municipal sewer lines and Naugatuck Wastewater Treatment Plant the temperature at points 500 feet subsequent to the inlet point of the Naugatuck Wastewater Treatment Plant.?

Correspondence and other communications in regard to this matter should be served upon the following persons:


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Water Pollution Control Authority
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Respectfully submitted,

BOROUGH OF NAUGATUCK and
WATER POLLUTION CONTROL AUTHORITY,

BY:



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