



STATE OF CONNECTICUT

CONNECTICUT SITING COUNCIL

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October 24, 2016

TO: Parties and Intervenors

FROM: Melanie Bachman, Acting Executive Director *MB*

RE: **DOCKET NO. 470** – NTE Connecticut, LLC application for a Certificate of Environmental Compatibility and Public Need for the construction, maintenance, and operation of a 550-megawatt dual-fuel combined cycle electric generating facility and associated electrical interconnection switchyard located at 180 and 189 Lake Road, Killingly, Connecticut.

Comments have been received from the Department of Public Health, Drinking Water Section, dated October 20, 2016. A copy of the comments is attached for your review.

MB/MP/cm

c: Council Members

STATE OF CONNECTICUT

DEPARTMENT OF PUBLIC HEALTH



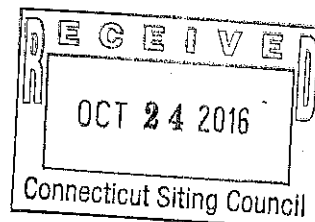
Raul Pino, M.D., M.P.H.
Commissioner

Dannel P. Malloy
Governor
Nancy Wyman
Lt. Governor

Drinking Water Section

October 20, 2016

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



Re: Docket No. 470 NTE Connecticut, LLC application for a Certificate of Environmental Compatibility and Public Need (CECPN) for the construction, maintenance and operation of a 550-megawatt dual fuel combined cycle electric generating facility and associated electrical interconnection and switchyard located at 180 and 189 Lake Road, Killingly, Connecticut.

Dear Ms. Bachman:

The Drinking Water Section (DWS) of the Department of Public Health (DPH) has reviewed the CECPN application for the above noted Docket Number for the Killingly Energy Center (KEC). The Docket submission notes that this project proposes to connect to the Connecticut Water Company (CWC) Crystal Division (PWSID# CT0690011) public water system to obtain up to 400,000 gallons per day of process water and drinking water, therefore the DWS offers the following comments:

- This project is located approximately 4,000 feet from the Killingly Industrial Park Wellfield (KIP), a source of public drinking water for the customers of the (CWC) Crystal Division. It is not located within the source water protection area as delineated by the DWS; however the final Level A Aquifer Protection Area (APA) mapping that would designate the regulated area surrounding the wells is not completed. If the proposed facility falls within the Level A APA and is not constructed prior to completion of the Level A mapping, the DWS requests an opportunity to review the project for potential impacts to the sources of public drinking water.
- A water supply analysis was provided by the applicant, however it does not sufficiently document that the CWC Crystal Division has adequate water available with the appropriate margin of safety to supply the KEC plant. The available water analysis needs to account for system demands, functional limitations of the distribution system and CWC's existing commitments to sell water to other entities in addition to the registered and permitted diversion amounts for the sources of supply. The analysis must also be performed for average day, peak day and maximum month demands. This analysis should be provided to the DWS for review and concurrence prior to construction of the facility.
- If the available water analysis indicates that interconnection with the CWC Plainfield system is necessary to ensure that the CWC Crystal Division maintains an adequate margin of safety under the KEC maximum demand scenario, then water supply infrastructure improvements must be constructed and approved for use prior to construction of the KEC plant.



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- Components of the proposed water supply infrastructure improvements may require DPH review and approval.
- Because the proposed facility will receive water from CWC, 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".
- CWC, 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 CWC 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 CT DPH Backflow Prevention Device Tester.
- Note that per RCSA Section 19-13-B102(f), CWC 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.

Thank you for the opportunity to comment on this Docket. If you have any questions, you may contact Pat Bisacky at (860)509-7333.

Sincerely,



Lori J. Mathieu
Public Health Section Chief
Drinking Water Section

Cc: David Radka, Connecticut Water Company
Gerard Beausoleil, Putnam Water Pollution Control Authority