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March 17, 2010

Amey Marrella, Commissioner  
Department of Environmental Protection  
79 Elm Street  
Hartford CT 06106s

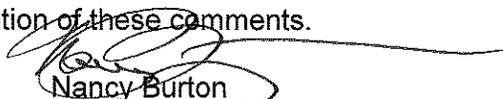
Dear Commissioner Marrella:

I writ on behalf of the Connecticut Coalition Against Millstone to present comments on the proposed amendments top the Water Quality Standards. These comments are particularly directed to those provisions which concern SA -designated coastal waters.

As you know, continuous industrial wastewater discharges - such as are released by the Millstone Nuclear Power Station - are prohibited under the current SA designation. We congratulate the DEP for maintaining this good standard, while at the same time we condemn the DEP for allowing the owner and operator of Millstone to blatantly disregard this legal requirement. We urge you to bring this serious polluter into compliance with the Water Quality Standards forthwith.

We also write to object to the proposed relaxation of standards governing thermal discharges within SA-designated zones. As you know, Millstone continuously discharges a thermal plume which extends to public beaches on the shorelines of Waterford and East Lyme. The thermal plume has been documented to cause harm to the existing marine environment and it contributes to the phenomenon of the rising temperature of the Long Island Sound. Scientists are finding that Long Island Sound marine fisheries are migrating out of their indigenous habitats and heading northward to cooler waters. DEP's relaxation of the temperature standards for SA waters will only worsen this phenomenon and will do so without the necessary studies of environmental impacts from the revisions. It appears that the standards are being relaxed to accommodate Millstone's illegal discharges and planned and recently implemented increased thermal discharges. The proposal to relax temperature standards is impermissible in light of the governing legislative mandates of the Connecticut Environmental Protection Act and the guiding principles of the Water Quality Standards themselves. These standards should be strengthened and enforced.

Thank you for your serious consideration of these comments.

  
Nancy Burton  
Director  
Connecticut Coalition  
Against Millstone

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