

Dear Mr. Popadopoulos,

I am writing on behalf of the Cape Cod National Seashore Advisory Commission to express our concerns about the draft NPEDES permit for the Pilgrim Nuclear Power Station. We feel that the permit as drafted is seriously lacking. Our concerns are as follows:

1) EPA is not requiring updated technology. The Clean Water Act (Section 316(b)) requires dischargers to update to BTA (best technology available) to reduce impacts to the environment, but the new permit is allowing the continued use of a once-through cooling system, not BTA. We support closed-cycle cooling to minimize importing water from Cape Cod Bay.

2) Pilgrim is discharging water hotter than allowed by State Water Quality Standards, so it requires a variance. The variance was based on an old, insufficient Demonstration Report, and is definitely insufficient today. EPA should deny the variance, and require Entergy to re-characterize the thermal plume impacts based on current trends and data on global warming issues.

3) We are very concerned that decommissioning activities, e.g., disturbing soils in combination with climate change issues such as rising seas and groundwater tables and stronger storms could cause even more pollutants to end up in storm drains and EPA isn't considering this.

4) There are 25 electrical vaults on-site that were never monitored before now -- these drain to the stormwater outfalls. Testing in 7 of the 25 found Total Suspended Solids, cyanide, phenols, phthalates, PCBs, antimony, iron, copper, zinc, lead, nickel, cadmium, hexavalent chromium. Lead, copper, and zinc were all exceeding marine water quality criteria. EPA is only requiring a 1-time test of ALL 25 vaults, & only making Entergy regularly test 5 of the 25 vaults, and the substances that Entergy has to monitor for is not even the full list of pollutants they already found (cyanide, antimony, nickel, and hexavalent chromium appear to be omitted). EPA needs to test all 25 vaults, develop a complete list of parameters, then the complete list of parameters should be included in the final permit. And there should be numerical limits not just monitoring whether pollutants are present.

5) For the past 10 years, Entergy has barely done any stormwater drain testing, despite it being a permit requirement. These stormwater drains are where the electrical vaults (and the long list of pollutants mentioned above) drain to. No enforcement actions have been taken for this lack of sampling. EPA has to start enforcing limits and conditions it imposes in order to protect the resources and qualities of Cape Cod Bay upon which we all depend.

Sincerely Yours,

Maureen Burgess  
Truro Representative to the Cape Cod National Seashore Advisory  
Commission