Jones River Watershed Association

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George Papadopoulos, Industrial Permits Section
5 Post Office Square, Suite 100, Mailcode OEP 06-1
Boston, MA 02109-3912

June 2, 2016

Cathy Vakalopoulos, MassDEP Bureau of Water Resources
1 Winter Street
Boston, MA 02108

RE: Request for Public Hearing: Entergy Pilgrim Nuclear Station NPDES Draft Permit No. MA0003557

Dear Mr. Papdopoulos and Ms. Vakalopoulos,

On behalf of Jones River Watershed Association, we would like to request a public hearing regarding the above referenced draft permit. As EPA and MassDEP are aware, this is an immensely important issue of significant public interest, particularly because it has been more than 20 years since Pilgrim's NPDES permit expired and began to be administratively extended by your agencies. Although our organization has not yet had time to completely review the draft permit, our opinion is that a public hearing is needed.

Among the most important issues to be raised at the hearing will be:

- Available updated technologies to reduce marine impacts that were not considered in the draft permit;
- impacts to Cape Cod Bay resources (including recently designated right whale critical habitat) that are raised by the requirements of the updated draft permit (i.e., water temperature limits, pollution prevention) and why EPA found that further mitigation of past and future impacts is not warranted;
- the application of the updated NPDES permit after Pilgrim shuts down in 2019, how permit requirements will address potential new conduits for pollution into Cape Cod Bay during decommissioning and cleanup (i.e., storm drains), and clarification of the reduction in water usage after shutdown;
- consideration of sea level rise and how this might further impact discharges from the site;
- accountability when monitoring and other requirements are not followed, as in the current permit; and
- the anticipated longevity of the permit considering the 20+ year administrative extension with the current permit.

Hosting at least one hearing in or near Plymouth, MA would be optimal to receive comments from communities most directly affected by Pilgrim's cooling operations and impacts to Cape Cod Bay. We also request that the hearing be held in the evening (between 7-9pm), in order to accommodate the majority of individuals who work during the business hours.

Thank you for considering this request and please feel free to contact us if you have any questions.

Sincerely,

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