

September 29, 2023

As the Michigan Department of Environment Great Lakes and Energy (MDEQ) takes comments on DTE's draft National Pollution Discharge Elimination System (NPDES) Permit, we are writing to express serious concerns with several aspects of the draft permit.

Contrary to a national ban on the discharge of polychlorinated biphenyl (PCBs), current permitting allows for the discharge of these dangerous chemicals on the part of DTE into Lake Erie with a deadline of 2028 to cease this discharge. We strongly protest this lax schedule which will allow DTE to continue to pollute Lake Erie and our communities for another 5 years. Our communities cannot wait.

Citizens' Resistance at Fermi Two (CRAFT) is an Indigenous-led people-powered organization focused on Earth, Ancestor, and Descendant-honoring practices. We sit in and with place-based respect while seeking a clean, healthy, safe, and just future for the environment. For almost one hundred years now our earth has been plagued with pollution, colonialism, unjust treatment, and sickness in relation to uranium and uranium extraction for the nuclear industry. For profit corporations and monopolies have been at the helm. DTE Energy is one such corporation that we can name. Their profit game is strong and the arm they use to hold back community power is strong as well. These actions are allowed by a legislature and regulatory structure in which DTE makes the rules / and our communities have no say.

It has been said that humans are destroying the environment. It has been said that humans are a part of the environment. We do know that our impact on the environment also impacts ourselves. From toxins and greenhouse gases to uranium extraction to capitalism, a deadly web is being woven throughout our home on earth.

For years, Fermi Two has operated with loose accountability when it comes to its discharge, including dangerous chemicals like PCBs and use and disposal of cooling water, much of which is discharged into local waterways and drinking water sources. This thermal discharge carries heavy metals, radionuclides, and other dangerous toxic chemicals that cause [severe impacts](#) on communities and ecosystems.

Nuclear power is borne on the health impacts that communities living near plants suffer, including rates of cancer, lower life expectancy and [more](#). The enormous cost to maintain, build and clean up nuclear facilities diverts resources from community-led renewable energy solutions and continues to pollute air, land, and water. Risks involved for communities that have already seen devastating environmental impacts cannot justly be ignored. Nuclear power is not safe and cannot be a part of an environmentally just transition into the future. It is important to regulate and enforce it while it is still being used, and that is part of why we are calling this in. The permit cannot move forward as is. We ask for more enforcement regarding pollution, water, and public health.

We, and the organizations and individuals that have signed and supported this letter ask these few important things:

**1) Citizens' Resistance at Fermi Two (CRAFT) is calling for a public hearing on this permit before its approval.** Community participation must be a crucial element of any permitting process, particularly one that carries with it such grave consequences for communities in and around the discharge area. It is unacceptable for MIDEGLE to approve a permit that would allow for such a devastating impact without first hearing from the communities most affected. The permit should be redrafted to include our voices.

**2) Limits must be placed on Fermi 2's thermal pollution of Lake Erie that are in alignment with the recommendations of the EPA.** We call on our leaders to employ swift action, accountability, and enforcement of DTE'S NPDES Permit. Discharges that harm our environment and don't comply with the Clean Water Act and go against the Environmental Protection Agency's recommended actions regarding [thermal limits](#) must be corrected. We ask MIDEGLE to enforce compliance with DTE on this permit.

**3) Fermi Two must be required to immediately stop discharging the banned chemicals and reduce those that are harming Lake Erie.** These include seven types of polychlorinated biphenyls (PCBs); we cannot wait until 2028. It also includes reduction in Phosphorus, Lead, Copper, and other toxins.

**4) We call on the Michigan Department of Environment Great Lakes and Energy (MIDEGLE) to use their legal authority to regulate radionuclides (radioactive by-products and elements) that pollute our drinking water sources and threaten our safety.** MIDEGLE must use the regulatory authority that it already possesses to eliminate radioactive byproducts from our drinking water sources. These are the causes of adverse health impacts in our communities, including high rates of cancer.

**5) National Pollutant Discharge Elimination System (NPDES) permits should not extend beyond five years without review.** If a permit were approved today and a violation occurred, the permit would not be up for review for 5 years. Lake Erie and we deserve better monitoring and enforcement with a swift timeline for action. The number of fish and fish egg kills need to be tracked and included in these reviews.

Communities that have seen the harmful and devastating effects of the nuclear fuel chain, including decreased life expectancy, worse health outcomes and a lack of access to safe, pollution-free lands and waters, must be at the forefront when this NPDES Permit are being discussed and decided upon. We call on our leaders and MIDEGLE to listen to, engage with, and respect the voices of these communities as they work towards legislation to address our shared climate and environmental crisis.

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