



May 12, 2014

Alabama Department of Environmental Management  
ATTN: Permits and Services Division  
PO Box 301463  
Montgomery, AL 36130-1463

**RE: NPDES Permit Number AL0073784, CER Generation LLC**

Dear Sir:

The following comments are submitted in opposition to the proposed modification of the referenced permit for the following reasons.

The application for permit modification does not meet the fundamental criteria of the anti-degradation policy. R. 335-6-10-.12(9) (b) states that the applicant shall include:

“A demonstration that the proposed discharge will support important economic or social development in the area in which the waters are located.”

CER's proposal for permit modification provides no planned or willful intent to bring either economic or social development to the area. Therefore, the Lake Martin Home Owners and Boat Owners Association, in addition to any reasonable and prudent person, conclude that CER's only intent is to greatly impact their bottom line profitability at the great expense of the introduction of hazardous chemicals into a waterway that feeds Lake Martin.

Lake Martin was designated by Governor Riley, in late 2010, as a Treasured Lake of Alabama. This lake met the criteria developed by ADEM. It convinced the Governor, and the public, of the pristine nature of this lake. To allow an enterprise to introduce Chromium, Mercury, Copper, Nickel, Potassium, Lead and Selenium to the waterway would create a very slippery slope toward the significant decline of this Treasured Lake's water quality.

The Lake Martin HOBOS join the call of other organizations and individuals encouraging ADEM to deny CER's request for permit modification. Likewise, we request that a Public Hearing be held in Alexander City at the soonest possible date.

Sincerely,

David R. Heinzen  
President, Lake Martin Home Owners and Boat Owners Association

cc: Mayor Charles Shaw, 4 Court Square, Alexander City, AL 35010

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*Post Office Box 1030  
Dadeville, Alabama 36853-1030*