



Ms. Dereth Glance  
Regional Administrator  
Region 7, NYSDEC  
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9 June 2026

RE: Historical Site Contamination at the Cayuga Operating Coal-Fired Power Plant Site and New Proposed Site Disturbance Activity – Environmental Review Considerations

Dear Ms Glance:

I am writing with urgency concerning proposed site development activities associated with TeraWulf's proposed construction of a 400 MW high-performance computing data center at the above site--now owned by TeraWulf subsidiary Cayuga Operating--and its potential impacts on historical contamination likely present at the site.

As local and state agencies begin evaluating a proposal for new development at this site, it is critical that the site's history of environmental contamination be factored into decision-making as early as possible by any agency called upon to comment on or participate in environmental review of the proposal, including, but not limited to the reviews called for in footnote 1.<sup>1</sup>

CLEAN asserts that significant earth disturbance activities should not be authorized at the site before DEC and other involved agencies have assessed whether the proposed development plans may disturb contaminated soils from historical activities or otherwise exacerbate site conditions

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<sup>1</sup> CLEAN anticipates that additional correspondence with DEC relating to TeraWulf's proposed project will likely be necessary as applicable permit applications are sought and environmental reviews conducted.

CLEAN understands that DEC has recently approved the renewal and modification of the existing SPDES permit (Permit No. NY0001333) and associated water withdrawal permit for Cayuga Operating Company, and that no separate SPDES permit specific to TeraWulf's proposed operations has yet been noticed or issued. To the extent future permit applications are submitted or modifications proposed in connection with site redevelopment, CLEAN respectfully requests that such applications be subject to full public review and informed by a comprehensive understanding of site conditions.

In addition, given the site's history of industrial use and the potential for legacy contamination, CLEAN requests that DEC consider whether further site investigation or evaluation under its remedial programs may be warranted to inform ongoing and future agency decision-making. CLEAN reserves the right to follow up on these or other issues as additional information becomes available.

or release pollutants that could negatively affect Cayuga Lake, neighboring natural wildlife areas, or nearby residents.

The site where the proposed data center is proposed to be located has a lengthy and well-documented history of environmental contamination. The Cayuga coal-fired power plant closed in 2019 and the associated unlined 42-acre coal ash landfill was capped and closed in October 2020. The site thereafter functioned as a brownfield with minimal active use.

We request that, at a minimum, an environmental site investigation be performed before any earth disturbance activities are performed and which evaluates, among other things, pollutant fate and transport from historical industrial activities at the site. The investigation should account for air deposition of pollutants in site soils from the former power plant's stacks, and other locations where contaminants and toxins from historical operations may have been released into site soils.

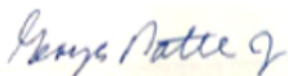
In performing the site characterization and investigation, it will be necessary to also evaluate the condition and remedial design of the site's unlined landfill, which contains wastes that have never been truly inventoried or defined and which is believed to intersect with the groundwater table in places.

Only after such investigation is completed can TeraWulf's proposal for significant earth disturbance across various parts of the site be evaluated. Otherwise, TeraWulf's proposal unnecessarily risks disturbing and exacerbating site conditions and releasing pollutants into the environment, creating avoidable uncertainty and risk for subsequent permitting and oversight decisions. TeraWulf also risks uncovering contamination that might necessitate immediate and expensive environmental response action, which may have been avoided had the site been fully characterized to begin with.

The foregoing issues are likely to be relevant to any determination of the scope and adequacy of environmental review for proposed development at the site. It is therefore critical that the appropriate DEC staff (including from its Division of Environmental Remediation) be made aware of these site-specific concerns and be in a position to comment as part of any environmental review associated with proposed site development.

CLEAN would welcome the opportunity to meet with DEC Region 7 staff to discuss and share technical details regarding historical operations at the site and the likelihood of legacy contamination across the footprint of the site.

Sincerely,



George D. Patte, Jr.  
CLEAN Steering Committee Member

Copies:

-Anna Kelles, NYS Assemblyperson, District 125, [kelles@nyassembly.gov](mailto:kelles@nyassembly.gov)

-Lea Webb, NYS Senator, Senate District 52: [leawebb@nysenate.gov](mailto:leawebb@nysenate.gov)

-Town of Lansing Planning and Code Enforcement Dept. Attn: Nathaniel Rogers;  
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