

MASSACHUSETTS ASSOCIATION OF CONSERVATION COMMISSIONS,
Belmont MA.

August 9, 2007

Ian Bowles
Secretary, EOEEA
100 Cambridge St.
Boston MA 02111
Attn Briony Angus, MEPA Analyst

Re: EOEA #13635 DEIR/NPC Russell Biomass Project

Most of the following comments focus on the NPC, the deadline for which I trust is the same as the deadline for the DEIR.

MACC is concerned with the quality and quantity of our water, land and air. This project offers challenges in many areas, due to such impacts as: use of the Westfield River, heavy truck traffic, wetlands filling, ash disposal and air emissions. Some of these problems would apply to any biomass project and may be difficult to obviate.

One aspect of the project, however, is completely controllable by your office. That is the source and nature of the fuel to be used in the plant. The town, in its special permit, specified the nature of the wood to be burned in the plant. Your Certificate noted and quoted the permit. At the time it was issued, the applicant promises the town it would be faithfully obeyed. Now, the applicant wishes instead to be excused from the special permit, so that it can use any "wood fuel" included by DEP in 310 CMR 7.00. As the DEIR notes, this is a much looser standard. Although s. 7 purports to exclude "materials which are chemically treated with any preservative, paint, or oil," it does allow the use of many wood by-products that would not come under the special permit. The difficulty with the DEP approach is that previous studies have shown the presence of many deleterious chemicals in wood-burning plants, and DEP has been unable to prevent their use. Mass. DEP Asst. Cmmr. James Coleman and Jan Ameen, Executive Director of Franklin County Solid Waste Mgt. District both agree that many loads do not meet DEP standards. Although a variety of reasons for this inability have been advanced, the principal reason is almost certainly that the "wood fuel" is prepared by a third-party fuel supplier, in this case North Country Procurement Inc. of Rumney NH. These companies grind up the wood materials, after which sorting becomes virtually impossible.

Candidly, it appears from DEP investigations that, although the suppliers can extract metal and some other objects in advance, it is simply not feasible for them to sort the material so as to exclude painted materials containing mercury or pressure-treated wood containing arsenic, lead, asbestos, and other such toxic items, even if they try in good faith to do so. There may in the future be methods for testing for such toxins—or, better

yet, manufacturers may learn to avoid them, but in the meantime. 310 CMR 7 *simply does not insure clean wood.*

Considering the time and money the state is spending on getting mercury out of our waste stream, so that we can once again eat our fish, it is insane to introduce such toxins where they can be avoided. The House of Representatives in Washington has declared these materials do not produce clean energy. NH and other states have banned these plants for a reason: The production of green energy need not and should not compromise public health.

The problem, we note, is not confined to the air pollution. The truly massive quantity of ash that this plant will produce is going to have to go somewhere and will probably end up in farm fields as landfill cover. The former may imperil public health. As to the latter, many of our landfills are not lined, so any toxic materials in the ash will leach into the groundwater.

We ask that you retain the special permit condition issued by the town, at least unless the applicant produces compelling proof that all toxics will in fact be removed. That the DEP does, or does not, allow something is not a compelling argument of this nature. Neither is the ready availability of "urban wood residues" (see Table T12-1) which cannot be properly sorted to exclude toxins.

Beyond this major issue, we also ask that the FEIR contain more information on the power lines within nature reserves that form an integral part of the project. The only impacts reported are visual. Supposedly mountain vegetation will shield the towers and lines. This is a peculiar position to take, given that power lines and towers are systematically kept free of all vegetation as part of standard maintenance. It is also obvious that much of these publicly owned mountains is composed of pure rock with little or no cover. The fact that an easement may or may not already exist for a power line in these areas is not relevant to a study of the environmental impact of new construction.

We would also ask that the applicant explain how 7,000 sf. of wetlands is to be filled without a variance from DEP.

Sincerely,

Alexandra Dawson
Legal Affairs Director