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**Angus, Briony (EEA)**

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**From:** Nancy Hone [phonehone@igc.org]  
**Sent:** Monday, August 20, 2007 9:17 PM  
**To:** Angus, Briony (EEA)  
**Subject:** comments on Russel Biomass project(EOEA#13635)

Dear Secretary Bowles:

I am absolutely opposed to the Russell Biomass project and ask that you seriously consider the fatal flaws of this project and reject the DEIR. The "No-build alternative" is the only acceptable choice as far as I am concerned, because the many harms of this project cannot be mitigated or minimized without moving the project elsewhere. This plant is so poorly sited that it would certainly prove to be a constant grief to our communities, a source of environmental and health problems, and a shame for the state if you were to let it go forward. The many risks and real costs clearly outweigh the benefits of this project. We are pleading with you to rescue us and not to allow this company to get away with misleading information. Following is a small sampling of the problems with this project and the DEIR:

- The Notice of Project Change (NOPC) seeks permission from the state to break an explicit promise to the town of Russell to burn 100% virgin wood and asks MEPA to allow the company to include pallets in the fuel mix. These pallets may be chemically contaminated with arsenic, copper, and other toxins. Please address the company's false and dangerous claims that chemical contamination of pallets is visually discernible, and reject the NOPC.
- The NOPC is written in such a way that could allow other chemically contaminated fuels in as well, including construction and demolition debris which is loaded with toxics. The company is in effect asking the state to act as 'thugs' in allowing them to burn what they explicitly promised not to burn. I want to ask that your office take great pains not to allow this nor be party to it in any way.
- The Draft Environmental Impact Report (DEIR) bases all of its studies on a 50-megawatt plant when in fact Russell Biomass is a 55-60-megawatt plant. According to MEPA regulations, this should trigger a Notice of Project Change and a redo of all environmental impact studies.
- Rare and endangered species on the Tekoa Mountain Wildlife Management Area and the Grace Robson Wildlife Sanctuary are threatened by the construction and maintenance of the transmission line for this project. These vital habitats, scenic overlooks, and recreation areas should be preserved and not trashed for this ill-conceived project.
- **The DEIR claims to prove that 840 weekly truck trips down Main Street Russell (at an average of one truck every 3.5 minutes) will have no adverse affect on local air quality. If it were not such a serious subject, this would be laughable: is the DEIR really scientific, or is it more like voodoo? If this meets the technical merits of the review process, then the review process itself is fatally flawed. The reality is that an estimated 450 people die from diesel fume inhalation every year in Massachusetts. Russell residents and schoolchildren deserve full state oversight of this situation and protection from this serious threat.**
- Many of the original MEPA comments have not been sufficiently addressed.
- Over 1,200 individuals, businesses, and environmental organizations have joined together to oppose this project. Please note that this includes Clean Water Action and Toxics Action Center which support the development of biomass power plants generally. However, they oppose this project because its siting clearly "poses an unacceptable risk to children, families and the environment" as explained in the petition statement below:

"Dear Secretary Bowles:

We, the undersigned, express our opposition to the Russell Biomass proposal, EOE # 13635 currently under review by your office through the Environmental Policy Act (MEPA) process. We think this is the wrong plant in the wrong place, and request that you seriously consider several major siting issues in your review of the proposal. This massive plant is proposed in a residential neighborhood, only 1600 feet from an elementary school and 600 feet from the nearest homes, and would bring a tractor-trailer truck down residential roads 840 times a week or about every four minutes. This is in a river valley with frequent air inversions that will trap hazardous air pollution at ground level like liquid filling up a bowl. Hampden and Hampshire Counties have some of the worst air pollution in the Commonwealth of Massachusetts. In particular, the American Lung Association cites Hampden as having the worst 24-hour particle pollution levels in the state. Both also receive "F" ratings for ozone, and the proponents have stated in their EENF that this power plant will exceed federal New Source Review standards for NOx, an ozone precursor. A new large-scale source of stationary air pollution thus poses an unacceptable risk to children, families and the environment. Thank you for your consideration."

Nancy Hone and Greg Schmidt  
Neighbors Against the Burner  
[phonehone@igc.org](mailto:phonehone@igc.org)  
2098 Carroll Ave.  
St. Paul, Minnesota 55104

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August 20, 2007

Secretary Ian A. Bowles  
Massachusetts Environmental Policy Act (MEPA) Office

C/O Briony Angus

Regarding: EOE # 13635 ("Russell Biomass Power Plant")

Dear Secretary Bowles:

I am writing on behalf of Neighbors Against the Burner, a citizen group, to comment on the so-called "Russell Biomass" project. We have followed "biomass" projects around the US and have found this: **They are always promoted by lots of "green" rhetoric" but prove in practice to have high emissions associated with serious health impacts.**

We at Neighbors Against the Burner have found that the incinerator industry has methodically gone around the country, riding on the global warming and "biomass" wave and making sure that burning garbage as well as construction and demolition debris, oat hulls, corn stalks and WOOD--of any sort -is included in the legal state definitions of BIOMASS. **The fact of the matter is that incineration of any sort even with the state of the art burners, produce nano-particles and other particulate matter that are directly connected to the increase in heart disease and respiratory functions.** In our State of Minnesota, a local television station did a very long piece in the past 6 months about the "epidemic" of asthma. This must stop. In our great state of Minnesota, the citizenry cannot figure out that in a year when our honorable Governor Tim Pawlenty and the State Legislature of Minnesota passed initiatives for the state to cut down on greenhouse gases to slow down global warming, the state is allowing the building of 4 more incinerators that we know of and the doubling of a garbage burning plant in Rochester Minnesota, the home of the illustrious Mayo Clinic. **THIS IS MADNESS!!!**

8/30/2007

For example, the so-called "Midtown Eco Energy" Project in Minneapolis, Minnesota is promoted in this "green" manner: <http://midtownecoenergy.com/>.

However, this 23 megawatt (net) project has, according to the Minnesota Pollution Control Agency, a potential to emit as follows:

They are:

Particulate matter [total]:	36 tons	72,000 pounds
PM 2.5 [less than 2.5 microns]	65 tons	130,000 pounds
NOx [oxides of nitrogen]	160 tons	320,000 pounds
CO [carbon monoxide]	160 tons	320,000 pounds
SO2 [sulfur dioxide]	40 tons	80,000 pounds
VOCs [volatile organic compounds]	27 tons	44,000 pounds
HAPs ["hazardous air pollutants"]	56 tons	112,000 pounds
total	544 tons	1,088,000 pounds

See <http://www.pca.state.mn.us/news/data/bdc.cfm?noticeID=276554&blobID=18831&docTypeID=4>

Note that this burner is about one-half the 55-60 MW output of the proposed Russell burner. Thus, if proportional, the emissions of regulated air pollutants from the Russell project could be expected to be over two million pounds per year. And this, of course, does not consider the real impact of the truck-related emissions. (Minnesota considered only the impacts of trucks while operating on the site, thus considering each round trip to have a length of 800 feet).

The present "air" regulatory process does not adequately address the health impact of very fine particles, sometimes termed "nanoparticles." Therefore, your office should carry out a full and independent assessment of these impacts. One useful document to start with this the report on incineration of the British Society of Ecological Medicine at [http://www.ecomed.org.uk/pub\\_waste.php](http://www.ecomed.org.uk/pub_waste.php).

In any event, ample evidence exists that levels of air pollutants \*below\* National Ambient Air Quality Standards increase morbidity and mortality.

The climate and geography of the proposed location suggest that dispersion of the air pollutants will many times be limited by a combination of confining terrain and inversions, leading to exposure to high and harmful levels of air pollutants. The proposed location is unsuitable.

**The history of such burners strongly suggests that the operators will eventually seek to burn additional types of waste beyond those mentioned in promoting the project. This is already happening, apparently, with a Notice of Project Change (NOPC) seeking to break a promise to the town of Russell to burn 100% virgin wood and to include pallets in the fuel mix. Many of these changes would tend to "dirtier" fuel, such as garbage, construction and demolition waste, etc.**

**There is a second industrial incinerator proposed in the middle of our beautiful metropolitan area of \$3 million people in St. Paul, Minnesota** to provide energy and steam for a local 99 year old paper recycling plant-the Rock Tenn company. There, too, "biomass" is the name of the game. They want a FLEXIBLE burner just like the Midtown Eco project. Whenever the word FLEXIBLE is used, it is code for "if there is not enough fallen wood in the city, we can burn up to 30% of what is incinerated to be garbage or RDF" which is just ground up unsorted garbage, despite what they propagandize to public officials of it being "nice and sorted garbage. Again, this all

in the year that our state has passed laws to cut down on green house gases! Amazing, isn't it?

**The incinerator industry also has another buzz word: STATE OF THE ART MODERN BURNERS** which they say don't pollute or just pollute a little. Well, a little bit of pollution is like being a little bit pregnant. It is still pollution! Also, as an R.N., I can tell you that the bio -accumulation of toxins reaches a level in the body after which it can no longer handle it and chronic and acute diseases start to happen such as cancers, heart disease, parkinsons disease other neurological diseases from the heavy metal pollution, asthma and any number of chronic lung conditions and respiratory conditions, etc.

Thus, it is likely that the Russell Biomass project, if built and operated, would have serious negative consequences for the "host community" which is true in other states and in the history of incineration. On the other hand, the proposed investment in this facility, if redirected into wind/solar/demand side projects, could produce great public benefits.

. State officials should take care not to be influenced by propaganda and should look hard at the underlying facts. We hope we have shed some light on the slick propaganda that is being used nation wide. Our group was at a very slick presentation a week or so ago for the Midtown Eco project that we mentioned above. Some of theNeighbors Against the Burner group, and we know better, started to say how good it sounded until we explained the propaganda to them, just as we have here to you. We know how slick their propaganda is and we urge you strongly to research the facts further and see what you come up with that is different than the party line that they feed all public officials.

We are confident, that once you do that, you will make decisions that are best for your beautiful state of Massachusetts that will keep your citizens healthy and safe.

This project should not proceed. A "no build" option is preferable.

Respectfully,  
Nancy Hone R.N., coordinator, Neighbors Against the Burner  
2098 Carroll Ave.  
St. Paul, Minnesota 55104  
651-647-9908  
651-503-3329