

January 9, 2008

Secretary Robert W. Golledge, Jr
Executive Office of Environmental Affairs
MEPA Office
100 Cambridge Street, Suite 900
Boston, MA 02114

Reference: Review comments on Environmental Notification Form for Pioneer Valley Energy Center, Westfield

Dear Secretary Golledge:

The Barnes Aquifer Protection Advisory Committee (BAPAC) has the following review comments on the above reference project proposed for Ampad Road in Westfield. Although the proposed project is outside of the City of Westfield's Aquifer Protection Overlay District, the site is within a high yielding aquifer. It was omitted for inclusion in the City's overlay district because there are no municipal wells with Zone IIs for that portion of the aquifer. However, as a potentially high-yielding productive aquifer, great care should be taken to evaluate the potential impacts of the proposed project on the aquifer. The Barnes Aquifer provides water to over 60,000 people in the communities of Westfield, Easthampton, Southampton and Holyoke.

Therefore, BAPAC would like the Draft Environmental Impact Report to take into consideration the following questions:

- What is the dispersion model for the ULSD fuel from the site in the event of a failure of the 1 million gallon storage tank at full capacity?
- What additives will be mixed with the ULSD fuel for stabilization? What effects do these additives have on drinking water?
- What types of air particulates will be emitted? What is the dispersion model for particulates from the stack?
- What type of "evaluation for stormwater in containment areas" will be provided prior to discharge as stated in the ENF?

In addition, BAPAC has the following comments regarding stormwater management and recharge:

- A gate valve should be provided prior to any and all infiltrating systems. This valve provides containment of a spill to prevent infiltration and contamination of the aquifer.
- Runoff from the entire site, including all equipment, parking, storage and fueling areas, should be contained in a stormwater treatment system to prevent direct infiltration of untreated stormwater. The ENF states that "portions of the proposed

site cover will be pervious to allow for infiltration of rainfall including proposed equipment areas, which will consist of ¾ inch clear crushed stone placed to a depth of 6 inches.” BAPAC strongly discourages this practice on industrially developed sites.

- Design of the fuel delivery area must also include containment and pretreatment of stormwater, including a gate valve on the drain line.
- During peak fuel usage, there may be ten or more fuel truck deliveries per day. The parking area for these vehicles also needs to be considered in the design of a contained stormwater treatment system.

Thank you for considering our comments.

Sincerely,

Michael Czerwiec, Vice-Chair

cc: Mathew A. Palmer, Pioneer Valley Energy Center Project Manager
Charles Darling, Water Resources Department, Westfield