

September 14, 2008

Anthony Petrucelli, Chair  
Westfield Planning Board  
City Hall  
59 Court Street  
Westfield, MA 01085

Reference: Commonwealth Guardrail, 132 Apremont Way, Westfield

Dear Mr. Petrucelli:

I am writing you on behalf of the Barnes Aquifer Protection Advisory Committee (BAPAC) to provide our comments regarding the Special Permit application for a 10,000 above ground storage tank for diesel fuel at Commonwealth Guardrail, 132 Apremont Way. Kelly from Lemelin Environmental Services, Inc. of Chicopee presented the specifications for the proposed new tank at BAPAC's September 9, 2008 meeting. BAPAC is composed of representatives from the four jurisdictions in which the Barnes Aquifer is located. The committee was created in 1989 to address developments of regional impact that are proposed within the aquifer to ensure that drinking water resources remain safe for the more-than 60,000 people that it serves.

BAPAC has reviewed the revised specifications for a Highland Fireguard Triple Wall Above Ground Storage Tank. BAPAC contacted Highland Tank at their Stoytown, PA location to clarify whether or not the tank specified was a double- or triple-wall tank. Highland Tank manufactures single and double-wall tanks. The double wall tank is typically designed with the Flameshield® outer wall which includes two walls of steel with a layer of insulation in between. This technically results in a triple-walled tank however it does not provide tertiary containment for fuel because of the insulation between the second and third layers of steel, therefore, not meeting the Special Permit requirements of the City of Westfield.

To overcome this, Lemelin Environmental commissioned a custom triple wall tank from Highland Tank through Wildco Petroleum Equipment. A plan of the custom triple-wall tank is provided in the specification package provided by Lemelin however all other documentation in the packet is for a double wall tank. The tank system will also include the Gasboy Fuel Management System and Veeder Root overfill alarm to prevent overflows during delivery and pumping and leak detection. The tank will be surrounded by bollards and located on a concrete pad. Given these specifications, the tank appears to meet the tertiary containment requirements of the City of Westfield's Water Resource Protection Ordinance.

Although the tank itself meets the highest standards for water protection, it is important the site design also supports protection of the aquifer in the event of a catastrophic failure of the tank. In the specification package provided by Lemelin Environmental, one of the pictures of an installed tank appears to be only feet away from an open catchbasin which is of great concern. BAPAC strongly encourages the Board to evaluate the location of the tank in relation to existing stormwater management structures such as catchbasins, leaching cells, swales, infiltration trenches, etc. to ensure that any failure of the tank is not

going to drain directly into one of these structures. Site design plans for the fuel dispensing and receiving areas should indicate how drips and spills will be prevented from entering the ground. Likewise, as with other sites in the overlay district, BAPAC requests that pretreatment for oil and grease and an emergency gate valve exist prior to all infiltration structures. An Emergency Spill Response Plan should also be provided to the Planning Board. Thank you for the opportunity to comment.

Sincerely,

Michael Czerwiec, Vice-Chair

CC: Lemelin Environmental Services, Inc. 70 North Street, Chicopee, MA 01020