

September 16, 2008

Secretary Ian Bowles
Executive Office of Environmental Affairs
MEPA Office
100 Cambridge Street, Suite 900
Boston, MA 02114

Reference: Review comments on Draft Environmental Impact Report for Pioneer Valley Energy Center, Westfield

Dear Secretary Bowles:

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.

Matthew Palmer, Pioneer Valley Energy Center, and Tracy Adamski, Tighe and Bond, reviewed the project with BAPAC in response to our comments on the ENF. The stormwater management system on the site appears to be contained, draining to a Stormceptor, preceded by an emergency shut off gate valve, prior to infiltration.

This land use is a high potential threat to the aquifer. As such, runoff from the entire site, including all equipment, parking and que areas for fuel trucks, storage and fueling areas, should be contained in a stormwater treatment system to prevent direct infiltration of untreated stormwater. The site plans include portions of the proposed site to be pervious, allowing for infiltration of rainfall including proposed equipment areas, which will consist of $\frac{3}{4}$ inch clear crushed stone placed to a depth of 6 inches. BAPAC strongly discourages this practice on industrially developed sites.

The Draft Environmental Impact Report does not provide a dispersion model for a catastrophic release of the ULSD fuel from the site in the event of a failure of the 1 million gallon storage tank at full capacity. BAPAC is interested in the amount of time the public water supplies surrounding the site would have before they would need to shut down their distribution systems. Additionally, what additives will be mixed with the ULSD fuel for stabilization and what effects do these additives have on drinking water?

Last, BAPAC requires tertiary containment for fuel storage. We recommend evaluating options for tertiary containment for the fuel and ammonia storage.
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