



CONNECTICUT RIVER WATERSHED COUNCIL

The River connects us

15 Bank Row, Greenfield, MA 01301

November 18, 2009

Daniel Hall
Solid Waste Section Chief
Bureau of Waste Prevention - Western Region
436 Dwight Street
Springfield, Massachusetts 01103

**Re: Springfield - SWM - Power Plant
BWP SW 40; Transmittal No. X226904; TF-22
Beneficial Use Determination
Provisional Permit Approval
C&D Derived Wood Fuel
09-281-050900**

Dear Mr. Hall,

I am submitting comments on the Beneficial Use Determination (BUD) for the Palmer Renewable Energy Project in Springfield on behalf the Connecticut River Watershed Council (CRWC). CRWC is the principal nonprofit environmental advocate for protection, restoration, and sustainable use of the Connecticut River and its watershed. The proposed 38-MW biomass energy plant will burn a maximum of 900 tons per day (tpd) of wood fuel from Construction and Demolition (C&D) processors and 200 tpd of green wood chips. We are concerned about this facility, and the permit, because of the increase in airborne contaminants that have also been known to be present in freshwater fish in our watershed due to the deposition of airborne contamination.

Section III of the BUD says that the application has been reviewed in accordance with Massachusetts General Laws Chapter 111, Section 150A (Solid Waste Disposal Facilities) and Massachusetts Solid Waste Regulations at 310 CMR 16.00 and 19.000. It is therefore surprising to us to see that General Permit Condition IV(A) says that this determination of beneficial use means that the material is *not classified as a solid waste*. We do not see how, under definitions given in 310 CMR 16.02 or 310 19.006, the construction and demolition waste to be incinerated would not be classified as a solid waste. In fact, the regulation that covers beneficial use, 310 CMR 19.060 is “beneficial use of **solid waste**.” This power plant should not be an end-run around incineration: all the same emissions standards should apply, and last I heard, Massachusetts had not formally put an end to the moratorium on incinerators.

We have reviewed the comment letter submitted by the Massachusetts Environmental Energy Alliance. Their detailed comments have identified a number of serious issues that should trigger major changes to the permit. The ones that are most pertinent to CRWC’s mission are the toxic emissions of arsenic, chromium, mercury, lead, and dioxins. In 2006, the US EPA published a comprehensive study of fish tissue contaminants in the Connecticut River. This publication is available online at <http://www.epa.gov/region1/lab/reportsdocuments/ctriverfr2000/index.html>. The EPA report found that mercury and PCBs were present in fish tissue in the Massachusetts river segments in amounts that may pose a threat to wildlife and people who rely on fish for subsistence. Dioxin was sampled at a few sites, and results indicated that dioxins may also be present in fish throughout the river in levels that may pose a health threat. Mercury and dioxins make their way into fish tissue via airborne pollution. With these pollutants already being a problem locally, we are extremely concerned about new emissions coming from this facility as well as the cumulative impacts of existing air contamination sources (Monsanto in

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Indian Orchard, Mount Tom coal fired plant in Holyoke, Covanta's trash-to-energy plant in West Springfield, Con Edison's oil-fired plant in West Springfield, to name a few) combined with the large number of proposed plants that will come on line soon (Russell Biomass, Pioneer Valley Energy Center in Westfield, Stony Brook II in Ludlow, Pioneer Renewable Energy in Greenfield).

The Pioneer Valley is already known to have an air quality problem. The air quality problem is a public health issue and a river contamination issue, and for this reason we believe MassDEP should issue a more stringent BUD permit that recognizes the fuel as solid waste, severely limits the emission of toxic substances, and requires better monitoring of emissions (the applicant should not be the one doing the monitoring).

We thank MassDEP for the opportunity to comment on this permit.

Sincerely,

A handwritten signature in cursive script that reads "Andrea F. Donlon".

Andrea F. Donlon, M.S.
River Steward

cc: Mary Booth, Massachusetts Environmental Energy Alliance