



Working with you to protect the environment of Berkshire County and beyond

February 29, 2008

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MA Department of Environmental Protection, WERO
Drinking Water Program, Bureau of Resource Protection
436 Dwight St
Springfield, MA 01103

RE: WMA permit application #: 9P2-1-04-256.04 Russell Biomass, LLC

Please accept these comments from the Berkshire Environmental Action Team (BEAT) on the Water Management Act permit application #: 9P2-1-04-256.04 for Russell Biomass, LLC

Process:

BEAT is unclear on how this draft permit can be issued prior to the final Secretary's Certificate from the completed MEPA process. From the about MEPA webpage: **"MEPA review occurs before permitting agencies act, to ensure that they know the environmental consequences of their actions."**

Alternatives analysis:

The Massachusetts Department of Environmental Protection (DEP) acknowledges that using air-cooled technology is technically feasible. In an age where weather is becoming less and less predictable, droughts are occurring across the country, and in some locations severe droughts are causing a widespread wish that there had been better control of water withdrawals before those areas reached that point; it seems foolish not to require air-cooled technology. There is no good reason to allow a new power plant to contribute unnecessarily to both increased water withdrawal from the ecosystem, and sending large amounts of water vapor into the atmosphere.

Water withdrawal:

BEAT would need to look at the Wastewater Discharge Permit to better understand the effect of the currently proposed withdrawal. What will the temperature of the discharge be? How much water will be discharged? And again, why should any water be allowed to be discharged back into the river, when technology exists to run this plant using air cooling instead.

BEAT is appalled that the draft permit appears to use the lowest flow that was ever recorded for this river as the target for minimum flow. This is not an environmentally sound methodology! If this methodology was used for the Ipswich River, the minimum flow would be zero. BEAT would suggest that a more appropriate minimum would be the aquatic base flow figure.

Aquatic Base Flow based on an 0.5 cfs factor is a quick and dirty way to estimate a minimal flow for a stream; however, it in no way guarantees that on any given river the flow is adequate for the flora and fauna of that stream.

If this permit were to be issued, all downstream NPDES permits should be reinvestigated because their dilution factors, based on the 7Q10, would need to be recalculated and adjusted accordingly.

Thank you for considering our comments.

Sincerely,

Jane Winn, Executive Director