

Exhibit 17



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November 19, 2010

CERTIFICATE OF THE SECRETARY OF ENERGY AND ENVIRONMENTAL AFFAIRS
 ON THE
 NOTICE OF PROJECT CHANGE

PROJECT NAME:	Palmer Renewable Energy
PROJECT MUNICIPALITY:	Springfield
PROJECT WATERSHED:	Chicopee River
EEA NUMBER:	14243
PROJECT PROPONENT:	Palmer Renewable Energy, LLC
DATE NOTICED IN MONITOR:	October 6, 2010

Pursuant to the Massachusetts Environmental Policy Act (G. L. c. 30, ss. 61-62I) and Section 11.11 of the MEPA regulations (301 CMR 11.00), I hereby determine in accordance with the regulatory standard for reviewing project change submittals at 301 CMR 11.10(8), that the changes identified in the NPC do not significantly increase the environmental consequences of the project and therefore **do not warrant the preparation of an Environmental Impact Report (EIR)**. As set forth in further detail below, the project changes serve to reduce environmental impacts.

The Palmer Renewable Energy project was previously proposed as a 38 megawatt (MW) biomass energy generating facility that would utilize construction and demolition (C&D) debris for the bulk of its fuel source. The primary change to the project identified in the Notice of Project Change (NPC) is the elimination of C&D as a fuel source for the facility and the substitution of green wood chips. In addition, the air pollution control system has been revised and improved since the filing of the Environmental Notification Form (ENF) in 2008 and electrical output has decreased to 35 MW. Taken together, these changes will serve to reduce the facility's emissions of Hazardous Air Pollutants (HAPs) by almost 50%, heavy metals (arsenic, chromium, lead and mercury) by 20-97%, nitrogen oxides (NOx) by over 60%, and carbon monoxide (CO) by approximately 40% from what was previously reviewed

under MEPA. Water use is also reduced by 20% and wastewater discharge is reduced by approximately 16%.

Although the project changes significantly reduce environmental impacts, the MEPA Office has nonetheless carefully reviewed and scrutinized the information and analysis presented in the NPC. Based on that information, and as confirmed through review by the Massachusetts Department of Environmental Protection (MassDEP), I am confident that the project will meet all applicable air quality standards, including compliance with the National Ambient Air Quality Standards (NAAQS). The NAAQS are stringent health-based standards established under the Clean Air Act (CAA) that are designed to preserve public health and protect sensitive subpopulations such as people with diseases (e.g. asthma, cardiovascular disease), the children and the elderly. MassDEP's permitting process will require emissions limits to be put in place to ensure these standards are in fact met, and will include monitoring to verify compliance. In addition, the NPC identifies comprehensive measures to further reduce project impacts, including state-of-the-art air pollution control technology and development of fuel specifications to minimize pollutant levels.

In response to the NPC submission, I have received a large volume of comment letters from state agencies, the City of Springfield, Springfield residents, local and regional health advocacy organizations and environmental advocacy groups. Many of these commenters express serious concerns about the potential public health and environmental impacts of the project and urge me to require the preparation of an EIR. I note that, as currently proposed, the project does not exceed, and in fact is not even close to exceeding, any of the MEPA thresholds for the mandatory preparation of an EIR. In addition, the project status under the MassDEP Air Plan Approval Process has shifted from a Major Source to a Non-Major Source of air pollution.

As Secretary I must consider the potential impacts of this project within the context of the MEPA regulations and air quality permitting program, which set specific standards for the review and permitting of projects. When viewed against these established criteria and standards, I do not believe that additional MEPA review is warranted. However, I want to assure commenters that I am well aware that the area that this project is located in includes sensitive populations that suffer disproportionate health impacts. As articulated in the comments from the Massachusetts Department of Public Health/Bureau of Environmental Health (DPH), health outcome data for the Springfield area indicate that there is an elevated disease burden in the community related to existing background conditions. The area has also been identified as an Environmental Justice community. Accordingly, it is imperative that projects proposed in this area meet every applicable air permitting standard, and that projects be required to avoid, minimize and mitigate environmental impacts to the maximum extent feasible. As set forth further herein, after reviewing the project's impacts and the mitigation proposed, I believe this project meets that high standard, and the state's permitting process will require that it does so.

The NPC contained an analysis of health outcome data and risk-based modeling that concluded that the facility will not adversely affect public health. Despite this conclusion, the proponent has committed to provide \$2 million to the City of Springfield to mitigate the impact of the project, two-thirds of which (\$1.33 million) will be dedicated specifically to addressing existing health impacts in Springfield. This is a significant, and I believe unprecedented, mitigation commitment for a project of this size, and the only such mitigation package to date that specifically addresses public health concerns. Following a stakeholder process to be lead by DPH, this financial support will go towards activities that

could, for example, increase health promotion and prevention efforts aimed at reducing respiratory problems, obesity and related disease such as cardiovascular disease and Type II diabetes. The Proponent has indicated it will work cooperatively with the City, DPH, MassDEP, local public health organizations and residents on this initiative. This significant mitigation commitment will help ensure that local residents benefit from the development of the project and not simply bear its impacts.

I am also aware that many commenters have highlighted emerging research, regulations and public policy concerning the use of biomass fuel for power in requesting additional MEPA review of the greenhouse gas (GHG) emissions of the project. Although not strictly required in the context of an NPC, the proponent has supplied a GHG analysis that meets the requirements of MEPA by quantifying the project's impact and proposing mitigation measures. I have also asked MassDEP to continue to review whether there are feasible modifications that can be made to this project to improve its efficiency, which would further reduce GHG impacts, during project permitting. That said, the other policies and regulations concerning biomass that are now pending relate to financial incentives under the state's renewable portfolio standards, and do not impose conditions or limits on biomass in terms of permitting. It would be inappropriate to unilaterally impose new requirements on individual facilities during the course of review under MEPA.

I find that the project changes presented in the NPC do not significantly increase the environmental impacts of the project but rather reduce them, and that no EIR is therefore warranted under the regulatory standard. However, state agency review of environmental impacts and public participation in that review do not end with the conclusion of MEPA review. Enforceable mitigation commitments will be developed by MassDEP through the Air Plan Approval process and that will address many of the concerns identified in comment letters, such as monitoring actual emissions and ensuring the fuel supply is consistent with specifications. MassDEP will make its draft Air Plan Approval available for public comment, and I encourage project stakeholders to continue their engagement in the permitting of this project.

Project Description

The Palmer Renewable Energy Project was described in the ENF as a 38-megawatt (MW) biomass energy plant located on 7 acres of the Palmer Paving Corporation site at 1000 Page Boulevard in Springfield. No changes were proposed to the existing Palmer Paving facility on the site.

The ENF indicated the plant would use an average of 900 tons per day (tpd) of wood fuel consisting of 700 tpd of C&D debris and 200 tpd of green wood chips. Steam from the project's advanced stoker boiler would power a steam turbine to generate electricity. Electricity from the plant would be fed to the transmission network via a new connection with existing or reconstructed Western Massachusetts Electric Company (WMECO) 115 kilovolt (kV) transmission lines immediately west of the project site. The proposed plant included an air cooled condenser to dissipate waste heat generated by the turbine. Exhaust from the boiler would be ducted to a scrubber, fabric filter, oxidation catalyst and Regenerative Selective Catalytic Reduction (RSCR) system and then to a 275-foot tall stack. Ancillary equipment included silos for lime, carbon and ash, and a double-walled aqueous ammonia tank for the RSCR. The boiler would operate continuously but the fuel handling system would be limited to no more than 16 hours per day.

Water for the project for potable and process uses would be supplied by the Springfield municipal water system via an existing 8-inch water main in Cadwell Drive and wastewater would be discharged to the Springfield sewer system through an existing 12-inch sewer main manhole at the intersection of Cadwell Drive and Curve Street. The project includes installation of an associated pump station. The ENF included a Stormwater Management Plan that indicated clean stormwater runoff from impervious surfaces would be conveyed to an on-site infiltration basin. This basin would be combined with a new stormwater collection system for the the adjacent site.

Project Change

Several changes to the project and site plan have been introduced since filing of the ENF. The primary project change and reason for filing the NPC consists of the elimination of C&D material as a fuel source and a commitment to use green wood chips exclusively for fuel. The switch to green wood chips will increase the amount of fuel required from 900 tpd to 1,184 tpd with an associated increase in truck capacity and truck trips. Improvements have been proposed to the air pollution control system, including replacement of the RSCR with a High-Efficiency Regenerative Selective Catalytic Reduction system (HRSCR). Other changes include alterations to the site layout and access roads, changes to the switchyard and identification of an alternate location for the stormwater detention basin.

The NPC indicates that green wood chips will be supplied by Northern Tree Service, Inc. of Palmer, MA. Fuel deliveries will be limited to clean uncontaminated non-forest woody material such as tree stems, branches, stumps and brush from various sources including: commercial tree care services and landscaping firms; state and municipal tree and brush removal storage areas; state and municipal park and recreation departments and tree care divisions; development land clearing and excavating firms; and orchards. Heat input will remain the same at 509 MMBTU/hr. Electrical output will decrease from 38MW to 35MW.

Changes to the site plan include reconfiguration of internal roadways and an increased building area. It includes a combined entrance to serve both Palmer Paving and the PRE site, with a dedicated left turn lane on Cadwell Drive. The existing entrance to Palmer Paving will be used for trucks exiting both sites. The revised site plan includes a new site entrance with a dedicated left turn lane. Initially, trucks coming to and from the site will use Page Boulevard. The NPC indicates that the route will be assessed after 3 to 6 months of operations to determine whether an alternative route should be considered. This Proponent will consult with the City and representatives of the neighborhood on this evaluation.

The project no longer includes construction of an on-site electrical switchyard by the Proponent. Instead, power will be transmitted to the electrical system through the Cadwell Switchyard being developed by WMECO (EEA #14271 Greater Springfield Reliability Project). Palmer Paving conveyed land on its western border to WMECO for the project.

Project Site

The site is bounded by Page Boulevard (Route 20) and a Friendly's restaurant to the south, Cadwell Drive to the east, a private roadway accessing a WMECO service facility and printing company to the north, and WMECO electrical transmission lines and the Route 291/Route 20 interchange to the

west. A residential neighborhood is located to the east. The project site does not contain any wetland resource areas subject to protection under the MA Wetlands Protection Act. Stormwater is contained on site and infiltrated through sand and gravel soils.

Jurisdiction/Permitting

The original project was subject to environmental review pursuant to the following sections of the MEPA regulations: 301 CMR 11.03(7)(b)(1), because the Proponent proposed to construct a new electric generating facility with a capacity of more than 25 MW; and 301 CMR 11.03(8)(b)(1), because the project was considered a new major stationary source with the potential to emit (PTE)¹ 27 tons per year (tpy) of particulate matter (as PM-10), 167 tpy of carbon monoxide (CO), 0.28 tpy of lead (pB), 47 tpy of sulfur dioxide (SO₂), 22 tpy of volatile organic compounds (VOCs), 134 tpy of nitrogen oxides (NO_x), and 23.8 tpy of hazardous air pollutants (HAPs).

The project required a National Pollutant Discharge Elimination System (NPDES) Construction General Permit from the U.S. Environmental Protection Agency (EPA); a Major Comprehensive Air Plan Approval, a Cross Connection Permit, a Beneficial Use Determination (BUD), and an Industrial and Sanitary Sewer Connection Certification from the Department of Environmental Protection (MassDEP); Massachusetts Department of Public Safety (DPS) Storage Tank Permits; Air Space Review by the Massachusetts Aeronautics Commission (MAC) and the Federal Aviation Administration (FAA); and Site Plan Review, a Special Permit and a Building Permit from the City of Springfield.

No additional permits are required based on the project change. The primary change in terms of permitting is that the project is classified as a Non-Major Source, rather than a Major Source, for air permitting purposes. The elimination of C&D debris as a fuel source also eliminated the requirement for a BUD permit associated with processing and handling of C&D debris. A BUD may still be required for ash disposal or reuse. The NPC indicates that once the facility is operating, it will be required to report, certify, and verify direct emissions of GHG pursuant to the GHG reporting requirements of the Air Control Regulations (310 CMR 7.71(3)(a)(2)).

The project change does not alter MEPA's jurisdiction over the project. The Proponent is not seeking financial assistance from the Commonwealth for the construction or operation of the project and therefore MEPA jurisdiction is limited to those aspects of the project that are within the subject matter of required or potentially required state permits with the potential to cause Damage to the Environment as defined in the MEPA regulations. In this case MEPA jurisdiction applies to air quality, noise, GHG emissions and solid waste.

Environmental Impacts and Significance of Project Change

Changes to the project and air pollution control equipment will reduce emissions of air pollutants compared to estimates included in the June 6, 2008 Certificate on the ENF. Potential emissions of NO_x are reduced from 134 tons per year (tpy) to 49.4 tpy and potential emissions of CO are reduced from 167 tpy to 99.5 tpy. Emissions of HAPs decrease from 23.8 tpy to 13.9 tpy. Emissions of certain heavy metals (e.g. arsenic, chromium, lead and mercury) are reduced by a range of 20% to 97%. Water use

¹ PTE means the maximum capacity of a stationary source to emit a regulated pollutant under its physical and operational design.

will be reduced by 24,136 gpd for a total of 91,634 gpd and wastewater generation will be reduced by 4,400 gpd for a total of 22,100 gpd.

Changes to the site will increase land alteration by 0.23 acres for a total of 3.43 acres of land alteration, increase impervious surfaces by 0.23 acres for a total of 4.23 acres, increase the size of buildings by 500 gross square feet (gsf) for a total of 73,700 gsf, and increase truck traffic by approximately 6 adt from 134 to 140 trips.

Efforts to avoid, minimize and mitigate environmental impacts include the following:

- emissions controls to reduce air pollutants and emissions monitoring to verify emissions levels;
- use of non-forest surplus wood that meets identified fuel specifications;
- quality control to ensure consistency with the specifications for feedstock;
- measures to reduce GHG emissions including incorporation of a 135 kilowatt (kW) solar photovoltaic (PV) system, use of high efficiency building shell and HAVC system for the office building and the use of biodiesel for on-site equipment;
- a stormwater management system including infiltration of clean stormwater runoff; and
- minimization of noise impacts through site planning, silencers on exhaust stacks and secondary enclosures on specific noise-producing equipment.

The MEPA regulations identify factors that should be considered in determining whether a change in a Project or the lapse of time might significantly increase environmental consequences including, but not limited to, expansion of a project and generation of further impacts. The regulations indicate that a project change is ordinarily insignificant if the expansion of the project consists solely of an increase in square footage, linear footage, height, depth or other relevant measures of the physical dimensions of the project of less than 10% over estimates previously reviewed, provided the increase does not meet or exceed any review thresholds. The project change will not increase the physical dimensions of the project more than 10% and the increase does not meet or exceed any review thresholds.

In addition, the regulations indicate that a project change is ordinarily insignificant if the increase in environmental impacts, including an increase in release or emission of pollutants or contaminants, results solely in an increase in impacts of less than 25% of the level specified in any review threshold, provided that cumulative impacts of the Project do not meet or exceed any review thresholds that were not previously met or exceeded. The project change reduces emissions of air pollutants and does not increase any other environmental impacts by more than 25% of the level specified in any review threshold. Again, no new thresholds are met or exceeded and overall impacts have been reduced.

Fail-Safe Petition

The Conservation Law Foundation (CLF) submitted a petition for Fail-Safe Review on November 9, 2010 on behalf of more than ten residents of the Commonwealth. MEPA regulations include a Fail-Safe Review provision (301 CMR 11.04). It indicates that, upon written petition by ten or

more people, I may require a proponent to file an ENF or undergo other MEPA review for a project that does not meet or exceed any review thresholds, provided that I find that several conditions are met.

Upon careful review of the petition, a response from the Proponent (submitted to MEPA on November 15, 2010), and the applicable regulations, I have concluded that no further review under MEPA is warranted at this time under the Fail-Safe provisions. In a separate decision, also issued today, I provide a detailed response to the Fail-Safe petition. In summary, the project is not eligible for Fail-Safe review under the express terms of the Fail-Safe provisions of the MEPA regulations (underlined above), because it in fact exceeds a MEPA review threshold and has been reviewed under MEPA. As discussed further below, the NPC includes a GHG analysis that is consistent with the GHG Policy under MEPA. Further review of these impacts under the Fail-Safe provisions is not necessary.

REVIEW OF THE NPC

The NPC includes a description of changes to the project, revised site plans, an alternatives analysis, proposed mitigation, a Non-Major Comprehensive Air Plan Approval Application, a Health Risk Assessment (HRA), a GHG Analysis and a Mobile Source Analysis. The ENF was distributed as required by the Commonwealth's Environmental Justice Policy (EJ Policy), as applied to MEPA. The NPC was distributed in compliance with MEPA regulations and the EJ Policy. The Proponent submitted supplemental information to the MEPA Office subsequent to the NPC. This information included a letter dated November 9, 2010 that provided a response to comments from the City of Springfield and a letter dated November 16, 2010 that provided a response to comments from Mary Booth. In addition, MassDEP comments note that the Proponent provided additional information and revised calculations in a November 5, 2010 letter.

The NPC includes an evaluation of the project changes in the context of 301 CMR 11.10(6), which contains the standards for review of NPCs under MEPA. The project change will increase the square footage of the project, land alteration, and impervious surfaces; however each of these increases is below the 10% level identified in the MEPA regulations as significant. Total square footage, land alteration and creation of new impervious surface remain below ENF thresholds for these impacts. The project change will increase water use and wastewater generation by an incremental amount; however, these increases are less than 25% of the level specified in the review threshold and these increases will not cause the project to meet or exceed any review thresholds for water or wastewater. As noted previously, the project will reduce emissions of air pollutants to a level that changes its permitting status with MassDEP from a Major Source to a Non-Major Source.

In addition, the project change does not require a new application for a state permit, financial assistance or a land transfer. The project will now be reviewed as a Non-Major Source and, because of the change in feedstock, it no longer requires a BUD permit for the processing or handling of C&D for fuel. A BUD may still be required for disposal or reuse of ash. The Springfield City Council voted to grant a Special Permit to the project on September 23, 2008. I note that this approval was granted for the previously reviewed project which included C&D debris in the feedstock. The local permit includes requirements to provide community benefits.

Air Quality

Federal and state requirements for compliance with the National Ambient Air Quality Standards (NAAQS) and compliance with New Source Performance Standards (NSPS) are implemented through the MassDEP Air Plan Approval permitting process. To support analysis of project impacts and consistency with regulatory standards, the NPC includes an Amended Non-Major Comprehensive Air Plan Approval Application and supporting emissions modeling, proposed emission controls, an air quality impact analysis and a noise analysis. It also includes revised project plans and revised process flow diagrams.

The changes identified in the NPC will significantly reduce the project's emissions of many air pollutants. Reductions in NO_x, CO and HAPs are associated with improvements to the process and air quality controls. Additional reductions in air toxics are associated with the elimination of C&D debris from the feedstock. According to the NPC, NO_x emissions will be reduced from 134 tpy to 49.49 tpy and CO emissions will be reduced from 167 tpy to 99.5 tpy. Emissions of HAPs decrease from approximately 23.8 tpy to 13.9 tpy. Emissions of heavy metals such as arsenic, chromium, lead and mercury decrease in the range of 20% to 97%. The project will be required to comply with the requirements for Best Available Control Technology (BACT) (310 CMR 7.02(8)(a)); however, it will not be subject to Appendix A, Non-Attainment Review.

The maximum potential emissions identified above do not approach or exceed any thresholds for an EIR, including air thresholds, and do not exceed any ENF thresholds for air emissions. These thresholds, which are keyed to the levels specified in MassDEP's air permitting regulations, assist the MEPA Office in determining whether the project has potentially significant air emissions. Based on these regulations, and on the information provided in the NPC, additional review of air quality impacts in the form of an EIR is not warranted; however, MassDEP will require additional information during the permitting process.

To minimize the project's air quality impacts and comply with BACT requirements, the project includes a series of emission controls. These include a wood-fired advanced stoker boiler with combustion air and over-fire air controls followed by sorbent injection, a unique dry scrubber system, fabric filter, a HRSCR, and an oxidation catalyst. The system will be designed to control NO_x, CO, SO₂, VOCs, acid gases, particulate matter including fine particles (PM 2.5) and heavy metals. A Continuous Emission Monitoring System (CEMs) will monitor and record exhaust gas quality including NO_x, CO, SO₂, filterable particulate matter, ammonia and diluent (either O₂ or CO₂). Fugitive emissions will be controlled by a water suppression system, use of paved roadways and regular road sweeping and a maximum speed limit of 10 miles per hour (mph).

The NPC includes a revised air quality dispersion modeling analysis to assess the potential impact of the project on ambient air quality. The AERMOD model was used to develop the analysis. Modeled air concentrations from the project were added to ambient background conditions for comparison with federal and state standards. The results of the modeling indicate that maximum predicted impacts for criteria pollutants are below Significant Impact Levels (SILs) which are employed to determine whether potential emissions are significant enough to warrant additional evaluation. In addition, ambient air quality impacts will also be below the Allowable Ambient Limits (AALs) and Threshold Effect Levels (TELs) for non-criteria pollutants.

Through the Air Plan Approval, MassDEP will determine if the proposed facility can meet BACT requirements and demonstrate compliance with all applicable state and federal air pollution control requirements. MassDEP will establish emission limits and will identify requirements for stack testing, monitoring, recordkeeping and reporting. An initial stack test for CO, NO_x, SO₂, hydrochloric acid (HCl), PM, VOC, ammonia, and air toxics will be required. A CEM will be required for ongoing monitoring of CO, NO_x, SO₂, filterable particulate matter, ammonia, and opacity emission levels. DEP will continue to monitor for all the listed pollutants in subsequent stack tests conducted during its operating life. The permit will also require monitoring of the air pollution control system's operation parameters and retention of all pertinent data. As part of the permitting process, MassDEP will explore opportunities to increase the efficiency of the combustion process and further reduce GHG emissions as discussed further below. Comments from MassDEP indicate that the draft air permit will be made available for public comment.

Subsequent to the filing of the NPC, MassDEP requested that the Proponent update and revise elements of the air modeling. In particular, MassDEP requested that the Proponent use 2009 air monitoring data in the analysis and use air monitoring data in for PM from the Springfield station, rather than the Chicopee station, to establish background levels. Comments from MassDEP address in detail the information provided in the NPC and in the revised information submitted by Epsilon Associates on November 5, 2010. MassDEP's comments indicate that the modeling analysis provides a reasonable estimate of maximum air quality impacts associated with the facility and that because predicted maximum impact concentrations are below SILs (as noted previously), the project has made an acceptable demonstration of compliance with the NAAQS. The comments note that SILs have not been established for the revised 1-hour NO₂ and SO₂ standards.

Although particulate emissions are well below major source levels, the MassDEP comments do highlight a concern with the relatively high background concentrations of PM 2.5. As a result of background concentrations and emissions from the facility, maximum PM 2.5 concentrations could reach 29.9 $\mu\text{g}/\text{m}^3$. Although well below the currently-applicable standard of 35.0 $\mu\text{g}/\text{m}^3$, 29.9 $\mu\text{g}/\text{m}^3$ is within the range of the revised PM 2.5 standard being considered by EPA. MassDEP comments note its ongoing support for revising the PM 2.5 standard based on the evidence linking fine particulates to adverse health impacts in sensitive populations. The comment letter therefore identifies two opportunities to address this concern. First, MassDEP will continue to examine through the permit review process all feasible measures that could further reduce PM 2.5 emissions. But recognizing that the community is already burdened with a background concentration that exceeds 29 $\mu\text{g}/\text{m}^3$, MassDEP recommends that measures directed at this condition and its impact on sensitive populations be included in the mitigation commitments that the proponent has indicated it will fund. MassDEP's air permit is expected to limit project emissions to ensure that the maximum ambient PM 2.5 concentrations do not exceed 30.0 $\mu\text{g}/\text{m}^3$. In addition, this facility will be the first project in the state required to provide CEM for filterable particulate matter.

Comments from DPH note some concerns about existing air quality and the attainment of ozone standards; however, the entire state is out of compliance with ozone standards. As required by the Clean Air Act in cases of non-attainment, the Commonwealth has an Ozone State Implementation Plan (SIP) to reduce levels and seek attainment and demonstrate that overall air quality is improving in the state. MassDEP is charged with developing and implementing the SIP and evaluating the consistency of

proposed projects with the NAAQS and regulatory programs. Comments from MassDEP indicate that the proposed project can meet these standards.

In addition, MDPH/BEH suggests background ambient air concentrations of NO₂ may be underestimated based on information provided by EPA. It indicates that the monitoring network may underestimate 1-hour maximum NO₂ ambient air concentrations by as much as 80%, because monitoring sites are not located near roadways where the majority of peak exposures are expected. However, this general statement does not appear to apply to the Springfield monitor where background readings were obtained. It is located in a large parking lot and approximately ¼ mile to a major highway intersection and its location was determined consistent with federal regulations.

Several commenters also express concern that the project will exceed its permitted emission levels, that feedstock composition will be altered once it is operating, or that the NPC has underestimated the volume of fuel that will actually be used. MassDEP will be closely monitoring facility emission levels to ensure compliance with the air quality permit; increased emissions will not be permitted without revising the facility's air permits. Similarly, MassDEP's permit will limit total annual fuel usage; in other words, the facility cannot unilaterally increase its fuel usage even if electrical output lags below 35 MW. Finally, the MEPA regulations require the filing of an NPC if there is a material change to the project that will increase environmental impacts. In the event that the facility intends to make any change to the composition of its feedstock, I am affirmatively directing that the proponent will need to file an NPC with MEPA and to file a permit amendment with MassDEP.

Noise

Assessment of noise impacts is addressed through the MassDEP Air Plan Approval process. The MassDEP noise policy requires that noise levels from the project are less than 10 dBA over existing ambient noise and that no pure tones are generated at the nearest residential receptors. The NPC includes a noise impact modeling analysis. The analysis indicates that modeled sound levels exceed 10dBA at the northern and western property lines; however, these are not residential receptors. The NPC includes letters from abutters indicating their acceptance of this condition at the property lines.

Measures to avoid, minimize and mitigate noise impacts include natural attenuation by distance and site layout, silencers on exhaust stacks and secondary enclosures on specific noise-producing equipment.

Public Health

The NPC includes a Health Risk Assessment (HRA) (included as Appendix D) to evaluate the potential public health impacts of the proposed facility. It provides an assessment of the baseline health status within the community, and evaluates potential health impacts by comparing project emissions with health-based benchmarks (such as the NAAQS) and evaluating the potential project impacts within the context of background levels of pollutants within an appropriate area. The HRA asserts that the assessment is very conservative based on maximum predicted emission levels and that many of the health-based benchmarks are set as upper bound estimates or established such that lifetime exposure is not anticipated to exceed any DEP health-based limits. The assessment includes: evaluation of short-term and annual average emissions of criteria air pollutants; assessment of total inhalation cancer and

non-cancer health risks associated with stack emissions; acute inhalation risks for respiratory irritants; potential ingestion risks associated with deposition of arsenic, lead and dioxin from the stack onto soils; potential impacts of mercury stack emissions on nearby freshwater fish; and potential risks attributable to other emissions including mobile and fugitive emissions sources associated with the project.

Comments from MassDEP note that the HRA provides a more comprehensive evaluation of human health risks than what is typically presented during project permitting. The comments indicate that the analysis provides a reasonable estimate of maximum concentrations of air and soil pollutants in the project vicinity, concluded that the predicted inhalation exposure point concentrations have been derived correctly using appropriate methods and that its Office of Research and Standards (ORS) concurs with the risk assessment conclusions for the suite of chemicals considered in the analysis. The comments identify some areas that would benefit from clarification and refinement during the permitting process and add that such revisions would not affect conclusions regarding health impacts.

Air dispersion modeling of pollutant emissions was used to predict short-term and annual average impacts for criteria air pollutants and more than forty air toxics. The analysis compares maximum modeled facility impacts to the NAAQS. The NAAQS includes primary standards, which are established to protect public health, and secondary standards, which are set to avoid unacceptable effects on the public welfare such as damage to ecosystems, crops and vegetation and buildings and property. In addition, they address both short-term and long-term health effects by requiring different averaging time for the standards (e.g. 1-hour and annual).

Table 2 of the HRA indicates that cumulative impacts (modeled facility emissions added to background levels) will not exceed any of the NAAQS, including standards for PM 2.5. The cumulative impact for PM2.5 is modeled to be below the respective 24-hour and annual standards of $35 \mu\text{g}/\text{m}^3$ and $15 \mu\text{g}/\text{m}^3$. As noted above, the PM2.5 standards are being reviewed by EPA, and the 24-hour standard may be reduced from $35 \mu\text{g}/\text{m}^3$ to $30 \mu\text{g}/\text{m}^3$ (PM Policy Assessment). However, projected cumulative impacts will also be below $30 \mu\text{g}/\text{m}^3$ level. MassDEP will ensure that enforceable limits are included to achieve this result. In addition, Table 1 of the HRA indicates that that maximum modeled emissions are below the MassDEP 24-hour Threshold Effects Exposure Limits (TEL) and annual Allowable Ambient Levels (AAL).

The inhalation risk assessment for chronic non-cancer and cancer health risks for non-criteria air pollutants was developed in accordance with risk assessment protocols. The assessment indicates that worst-case chronic exposure to projected facility emissions is unlikely to create non-cancer or cancer health risks in nearby communities (Table 8 and Table 9). The short-term exposure evaluation was conducted for NO_2 , SO_2 and several air toxics (formaldehyde, acetaldehyde, acrolein) that, at sufficiently high levels, are known to be respiratory irritants. NAAQS standards, updated to protect against adverse health effects associated with short-term exposure including respiratory effects in sensitive populations such as asthmatics, were used to assess impacts of NO_2 and SO_2 . Acute Exposure Guideline Levels Risk (AEGs), assessment guidance recommended by the EPA Office of Solid Waste (OSW), and toxicity factors developed by the CalEPA Office of Environmental Health Hazard Assessment (OEHHA) were used to evaluate impacts associated with air toxics. Acute health risks were assessed at locations of maximal impact and at area schools. The results indicated that the cumulative impacts for NO_x and SO_2 are well below the 1-hour health-protective NAAQS for NO_2 and SO_2 and

maximum modeled concentrations of the air toxics are also below guidelines and standards and not expected to contribute to acute respiratory-related health impacts.

Comments from DPH indicate that available health outcome data clearly demonstrate an existing and statistically significantly elevated disease burden in the population living near the proposed site. These comments indicate that hospitalization rates for asthma-related events for Springfield as a whole, are statistically significant compared to the state and that areas within one mile of the proposed site have statistically significantly higher age-adjusted rates of asthma-related hospitalizations when compared to the state as a whole. Based upon these clearly existing impacts, comments from DPH and from the Springfield Public Health Council urge me to require the Proponent to mitigate potential public health impacts of the facility and support improvements to the health status of the affected neighborhoods.

Some of the suggested mitigation measures proposed by DPH include: opportunities for public access to monitoring data; monitoring of the perimeter of the facility for a discrete period of time in areas of maximum impact; diesel retrofits for truck fleets delivering feedstock and/or retrofits of municipal fleets; restrictions on truck travel near schools as well as the time of day restrictions; and support for residential and municipal conservation and energy efficiency programs. I ask that MassDEP consider these measures as mitigation for project impacts during its permitting process.

In addition, as noted above, the proponent has committed to making a total of \$2 million available to the City of Springfield as mitigation for the project. Of that amount, \$1.33 million will be dedicated specifically to funding local health improvements, which are to be selected by the City and other stakeholders over the first three years of plant operations. This funding commitment will be coupled with the ongoing efforts of DPH to conduct a health impact assessment (HIA) for Springfield. The original study was designed to evaluate the potential health impacts of using C&D waste and to identify effective mitigation. Based upon the project changes presented in the NPC, DPH is planning revisions to the HIA that would emphasize mitigation to address existing health disparities that can be supported by the community and be funded by the Proponent's mitigation commitment. The HIA process should be used to assess the costs and benefits of various mitigation strategies. I expect the Proponent will work constructively with DPH, MassDEP, the City of Springfield, local health officials and residents to identify effective uses for the funds.

MassDEP, DOER and DPH have offered their assistance to the Proponent to identify projects that will support improved air quality and public health in the project vicinity. MassDEP comments identify potential measures to reduce pollutants linked to public health and climate concerns such as enhanced energy efficiency measures, HVAC equipment replacement and retrofits in public buildings, fuel substitution, and addition of pollution controls or retrofits at existing facilities.

Fuel Source

The facility will accept, store and process clean wood fuel. The NPC indicates that the fuel will consist of non-forest derived green wood chips comprised of tree stems, branches, and stumps and brush generated by a variety of contractors conducting tree pruning and land clearing in the course of land and utility development and maintenance. The feedstock may also include wood pallets, but the NPC emphasizes that none of the feedstock will be generated from forestry operations. MassDEP comments indicate that, provided that all of the wood accepted and used by the PRE facility is clean green wood

chips and clean (unpainted or otherwise coated) pallets, a BUD will not be required for the combustion of the wood.

Fuel will be delivered to the site by 25 ton trucks five to six days per week during daytime hours. The 5,000 ton bulk storage pile will hold approximately 4.5 days of fuel supply. The fuel handling system will operate no more than 16 hours per day and trucks will be limited to six days per week for a total of 13 hours per day from 6 am to 7 pm. Fuel will be dumped into a transfer bin and moved to the grinder house via a stock-out conveyor system. The conveyor system will feed fuel onto a vibratory screen for classification. Material meeting size specifications will fall through the screen and be conveyed to the bulk storage shed. Material exceeding the size specifications will be diverted to the grinder and then directed to the storage shed through the conveyor system. The storage shed consists of a 30,000 sf covered and enclosed structure. A 50- foot wide opening is provided on one side of the shed to provide access to the front end loaders. Fuel is moved by the front end loader into a reclaim hopper from which it will be fed onto a 100 tph reclaim conveyor system. The conveyor system delivers the wood to two metering bins within the boiler building that will provide 8-hours of capacity.

Hot bottom ash will be quenched in a water bath and removed by drag chain to a dumpster. The material will be transported off-site via a covered truck for proper disposal or reuse. The material may be provided to Palmer Paving for use in the asphalt production process subject to a BUD; however, a decision regarding this alternative will not be made until after plant start-up. Fly ash will be pneumatically conveyed to a 170 ton silo where it will be discharged via dustless unloader (using water conditioning) into a truck. The material will either be delivered to Palmer Paving or transported off-site for land application subject to a BUD.

The NPC includes a survey to evaluate the availability and distribution of feedstock and concludes that sufficient supply is available to meet project demand. Project demand of 370,592 tpy is based on the use of 1,184 tpd, 6 days per week. The Proponent has proposed a specification to limit contaminants in the wood fuel and that will form the basis for routine sampling and monitoring of the fuel to ensure that it meets the specification. The fuel sampling and monitoring combined with continuous emissions monitoring of the exhaust stack from the boiler and air pollution control train will be required by MassDEP as part of the Air Plan Approval.

MassDEP comments indicate that it will require PRE to conduct a rigorous, ongoing fuel monitoring and sampling program to ensure the facility only accepts green wood chips, complies with air emission limits, and conforms with assumptions of the HRA. Details of the Wood Quality Assurance Program will be developed through project permitting. It will identify the elements of the quality assurance/quality control program including inspections of supply, fuel sampling and analysis, fuel feed monitoring, continuous emissions monitoring, ash analysis and record keeping. I agree with comments suggesting that the type of waste wood permitted to be combusted by the facility needs to be clarified and note that several commenters raised questions regarding specification of the off-site storage pile. I expect these questions can be addressed during permitting.

Greenhouse Gas Emissions

The MEPA Office established a GHG Emissions Policy and Protocol (the Policy) to address the mandate of the Global Warming Solutions Act that state agencies consider GHG emissions and impacts

in issuing project approvals (see M.G.L. c. 30, s. 61 as amended). The Policy is applied to projects that are subject to an EIR. It requires a quantitative analysis of potential GHG emissions and evaluation of measures to avoid, minimize and mitigate GHG emissions. In the case of NPCs, application of the GHG Policy and analysis requirements are addressed on a case-by-case basis. The Policy does not establish allowable emission levels or performance standards, nor does it prescribe particular mitigation.

The project was not subject to the Policy when the ENF was filed with MEPA in 2008. Although not strictly required under the Policy, the NPC includes a GHG analysis (at Appendix E) that discloses associated GHG emissions and evaluates mitigation measures. The analysis identifies potential emissions associated with the project and identifies mitigation commitments to reduce GHG emissions. Specifically, it identifies GHG emissions associated with combustion of the feedstock (391,355 tpy) and direct emissions associated with trucking and the on-site yard loader (2,121 tpy) for a total of 393,746 tpy. The analysis asserts that the project will offset more GHG than it will generate because it assumes that the feedstock being utilized is carbon neutral. This assumption is premised on the idea that the carbon content of waste wood would have been released to the environment relatively quickly through the material's decomposition in the absence of the project. The analysis also takes credit for 125,000 tpy of avoided emissions associated with offset utility generation (based on 35 MW of output and use of the average grid emission factor). Lastly, the analysis takes credit for avoided trucking by creating a demand in closer proximity to supply.

Despite these assertions, the NPC includes a commitment to reduce GHG emissions through installation of a solar photovoltaic (PV) system on the roof of the storage shed (with a capacity of 135 kilowatts), inclusion of a high efficiency building envelope and HVAC system for the office building, using and encouraging contractors to use biodiesel for equipment, use of refrigerants with low ozone depletion potential, and recycling of at least 50% of the C&D debris. In addition, the Proponent indicates its commitment to continue assessing opportunities for providing waste steam to area facilities.

MassDEP and the DOER have provided detailed comments on the proponent's greenhouse gas analysis. I agree with those comments and incorporate them as a basis for my decision today. As reflected in comments from MassDEP and DOER, the NPC presents an acceptable quantification of the project's direct GHG emissions and mitigation measures, and I have therefore determined that it adequately and properly complies with the basic requirements of the MEPA GHG Policy and Protocol. This finding should not be interpreted as an endorsement of the proposed facility. In particular, I cannot agree at this time with the proponent's conclusion that the project will be carbon neutral or negative; however, MEPA does not approve or deny projects, but ensures that the environmental impacts of proposed projects are disclosed and mitigated to the maximum extent feasible. The Proponent fully quantified the project's total estimated emissions and thereby provided a framework that allowed the state agencies to review the potential GHG impact of the project and to assess the adequacy of the proposed mitigation.

As evidenced by the the "Biomass Sustainability and Carbon Policy Study" prepared by the Manomet Center for Conservation Sciences (the "Manomet study") for DOER, and proposed revisions to the regulations for awarding renewable energy credits, the Commonwealth is improving understanding of the net climate impacts of biomass facilities and does not accept that all biomass is carbon neutral. Evaluating the climate impacts of biomass facilities is complex and will vary depending upon combustion technology, fuel sources, decomposition rates and land use assumptions and associated

sequestration rates. Although state agencies agree that waste wood would normally decay relatively quickly, additional data would be required to definitively support this assertion regarding the net carbon impact of the project.

Also, I note that the comments from CLF and others regarding additional GHG analysis suggest that an EIR should include a full lifecycle GHG accounting that would identify the alternative fate and uses of the waste wood. As described in the response to the Fail-Safe Petition, I have determined that the analysis provided is consistent with the Policy and that it would not be appropriate to now impose a new requirement to conduct such an analysis during the course of review of a specific project.

While the determination of the net GHG impacts of the PRE project is subject to a certain level of unavoidable uncertainty, it is clear that any improvements to process efficiency will reduce overall emissions. Comments from MassDEP and DOER indicate that the proposed plant, operating at nominal full load conditions, will be approximately 23.47% efficient and that the gross emission per unit of electric energy generated by the plant is more than twice that of energy from the current Independent System Operators-New England (ISO-NE) grid. Because of this disparity, I expect the Proponent will consider any and all feasible measures that can improve the efficiency of the process. Numerous potential mitigation measures are identified by DOER in the MassDEP comment letter (e.g., highly efficient steam turbine, use of variable frequency drives). These should be evaluated for their ability to increase the efficiency of the facility and I expect that MassDEP will require consideration of these measures during the air permitting process.

Several comments indicate that the project should not receive or is not eligible for Renewable Energy Certificates (RECs). Although the availability of RECs would likely improve the financial viability of the project, it is not a regulatory requirement. Revisions to the regulations are ongoing, so their ultimate application to this project is still uncertain. Under the proposed draft regulations, the project would not likely be eligible for RECs because, although the waste wood may meet identified standards, the process does not meet a 40% efficiency standard. I note that these regulations serve as a mechanism for incentivizing the development of biomass projects that are most beneficial from a climate standpoint, but those regulations do not create any requirements applicable to the MEPA review and permitting of projects.

The NPC indicates that the Proponent's goal is to start construction as soon as possible and that construction is likely to be prior to implementation of the EPA GHG tailoring rule. The tailoring rule will be in effect in July for new facilities that generate more than 100,000 tpy of CO₂ emissions. In the event that construction of the project is delayed and the project is subject to the tailoring rule, the Proponent should consult with the MEPA Office regarding whether an NPC would be warranted.

Solid Waste/Construction

The Proponent should review MassDEP comments regarding compliance of construction activity with Solid Waste and Air Quality Control regulations. The Proponent should implement measures to alleviate dust, noise, and odor nuisance conditions that may occur during the construction and demolition activities.

Mitigation/Monitoring

Measures to avoid, minimize and mitigate project impacts, identified in the ENF and NPC, include the following:

Air Quality, GHG and Public Health

- Provide \$2 million to the City of Springfield to address existing health impacts in Springfield and provide other community benefits. The Proponent will work cooperatively with the City, DPH, MassDEP, local public health organizations and residents on this initiative.
- Installation of state-of-the-art air pollution controls including a CEM for post-construction monitoring of certain air emissions levels.
- Additional post-construction air monitoring at the property perimeter under conditions to be determined by MassDEP.
- Limit fuel supply to non-forestry sources of clean green wood chips and develop monitoring plan to insure that only non-forestry green wood chips and pallets.
- GHG reductions through construction of a high-efficiency shell and HVAC system for the office building, use of biodiesel for the yard loader, encourage use of biodiesel by fuel delivery and ash haul trucks, installation of a solar photovoltaic (PV) array, with an approximate capacity of 135 kW on the roof of the fuel storage shed, and establish a goal of 50% reduction in construction debris.
- Continue to explore incorporation of cogeneration at the site and conduct a district energy pre-feasibility assessment to identify potential users.

Noise

- Reduction in noise impacts through site layout including location of outdoor operations in western part of site away from residences.
- Installation of silencers on exhaust stacks.
- Secondary enclosures on specific noise-producing equipment.

Traffic

- Design of the Cadwell Drive/site access to achieve a level-of-service (LOS) of C or better. Redesign of site entrance to combine access for both facilities including a new site entrance with a dedicated left turn lane to reduce off-site queuing and a separate dedicated truck access.
- Proponent will evaluate the truck route (Page Boulevard), in consultation with the City of Springfield and representatives of the neighborhood, within 3 – 6 months of operations to determine if use of Route 141 to the north is warranted.

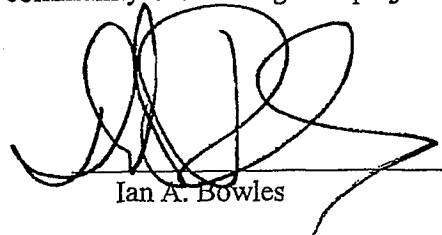
Conclusion

I have determined that the NPC has sufficiently defined the nature and general elements of the Palmer Renewable Energy project and proposed measures to avoid and mitigate environmental impacts. I am satisfied that any remaining issues can be adequately addressed during the state permitting process.

The proposed project, as described in the NPC, requires no further review under MEPA. I strongly encourage the Proponent to continue to coordinate closely with the City and the neighborhood during project permitting, throughout the development of community-based mitigation projects, and during construction and operations.

November 19, 2010

Date



Ian A. Bowles

Comments Received:

10/18/10 Arise for Social Justice
10/18/10 Massachusetts Forest Watch
10/18/10 Lee Ann Warner
10/18/10 Stuart Warner
10/18/10 William Warner
10/18/10 Joseph M. Metzger
10/18/10 Martin Dobrow
10/18/10 Jeffrey Musto
10/18/10 Geoffrey S. Brown
10/18/10 MaryGrace Stewart
10/18/10 Claudia N. Hurley
10/18/10 Romy Viera
10/18/10 Gerald E. Sweeney
10/18/10 Jorge Costa
10/18/10 Jon Weissman
10/18/10 Nancy Woodman
10/18/10 Carole Dupont
10/18/10 Carl W. McCargo
10/18/10 Jeff Napolitano
10/18/20 Amanda Jenny
10/18/10 Wyatt Warner
10/18/10 Tomeka Ligon
10/18/10 Becky Mitchell
10/18/10 Kathleen Breuninger
10/18/10 William P. Tarnowski
10/18/10 Meg Sheehan
10/18/10 Lara Shepard-Blue
10/18/10 Cecelia P. White
10/18/10 Lucinda Gallela
10/18/10 Betty Agin
10/18/10 Steven Dzubak
10/19/10 Brian Markey
10/19/10 Juliane Barbeau

10/19/10 John Cohen
10/19/10 Rebecca Hull
10/19/10 Mary Knox
10/19/10 Tina Clarke
10/19/10 Isabel Pellot
10/19/10 Rebecca Yaffe
10/19/10 R. Patrick Henry, Jr.
10/19/10 Tusi Gastonquay
10/19/10 Emma Morgan
10/19/10 Deborah Benoit
10/19/10 William Gibson
10/19/10 Caitilin B
10/19/10 Winston McLean
10/19/10 Stephen A. Lengieza
10/19/10 Cara Michelle
10/19/10 Luke Woodward
10/19/10 Verne McArthur
10/19/10 Laurel R. Davis-Delano
10/19/10 Carolyn Toll Oppenheim
10/19/10 Emily Lewis
10/19/10 Martha Nathan MD
10/19/10 Diana Riddle
10/19/10 Liz Suozzo
10/20/10 Jeffrey Henderson
10/20/10 Jill A. Vagedes-Baue
10/20/10 Mary Elizabeth Bewsee
10/20/10 Sharon Gensler
10/20/10 Christine Rogers
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10/20/10 Elaine M. Chittenden
10/20/10 Behzad Samimi
10/20/10 Michael L. Lindberg
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10/21/10 Jill Vagedes-Baue
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10/21/10 Neil Pregozen
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10/21/10 Dr. Jeffrey Henderson

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10/21/10 Cecelia P. White
10/21/10 Chrisoula Marangoudakis
10/22/10 Pioneer Valley Asthma Coalition
10/22/10 Patricia Mari
10/22/10 Eleanor E. Steinberg
10/22/10 Maria Theodoros Kamoulakou-Marangoudakis
10/22/10 Shirley Vernick
10/22/10 Marian Wolfsun
10/22/10 Nisha Dawson
10/22/10 Graeme Sephton
10/22/10 Joseph Coghen
10/22/10 Maya Rhinehart
10/22/10 Marianne Beach
10/22/10 Patti McCauley
10/22/10 Winston McLean
10/23/10 Clifford McCarthy
10/23/10 Judith Seelig
10/23/10 Dr. Tom Neilson
10/23/10 Sister Jane F. Morrissey
10/23/10 Dawn Sacks
10/23/10 Claire Chang
10/23/10 Eileen McGrath
10/23/10 Carla A. Bernier
10/23/10 Edwina Kreps
10/23/10 Ilene Stahl
10/23/10 Richard Seelig

10/23/10 Hazel Dawkins
10/23/10 Michael Dover
10/23/10 Emily Fox
10/23/10 Eleanor Manire-Gatti
10/23/10 Nancy Stark Smith
10/23/10 Samuel Gladstone
10/23/10 Janet Masucci
10/23/10 Suzanne Turner
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10/24/10 Elizabeth Castro
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10/24/10 Amy Sophia Marashinsky
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10/24/10 Rosemary Dewees
10/24/10 Linda Crawford
10/24/10 Julie Rypysc
10/24/10 Elia Dreyfuss
10/24/10 Mark Fraser
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10/24/10 Jane Harrington
10/24/10 Joseph Belmont
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10/24/10 Barbara Earley

10/24/10 John Korona
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10/24/10 Joe Jewett
10/25/10 Alexandra Dawson
10/25/10 Magdalena Hoersch
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10/25/10 Susan Leary
10/25/10 Juliane Barbeau
10/25/10 Marsha Leavitt

10/25/10 Colleen Mollica
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10/25/10 Peter Ames
10/25/10 Kathleen Szegda, MPH, MD
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10/25/10 Dvora Eisenstein
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10/25/10 Jeff Murray
10/25/10 Emily Hardt

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10/25/10 Michelle Arsianian
10/25/10 Richard R. Kofler
10/25/10 Richard S. Stein
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10/25/10 Meryl Nass, MD
10/25/10 Mark Roman
10/25/10 Jacqui Deveneau
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10/25/10 Zara Zsido
10/25/10 Nora O'Keefe
10/25/10 Steve Wineman
10/25/10 Paul Lischetti
10/25/10 Owen R. Broadhurst
10/25/10 Ruth Hooke
10/31/10 Eva Cappelli
10/31/10 John Durocher
10/31/10 Carol Jeneral
10/31/10 David Lindberg
10/31/10 Glen Ayers
11/1/10 Stephen H. Kaiser
11/1/10 Charles Strong
11/1/10 Carmine Calento
11/1/10 Geraldine Calento
11/1/10 Michael Abrahamson
11/1/10 Lawrence Fine
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11/1/10 Cynthia P. Hartdegen
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11/2/10 Paul Dube III
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11/2/10 Luis Eugenio
11/2/10 Nuno Afonso
11/3/10 Daniel OShea

11/3/10 Derek Swist
11/4/10 Carrie Ramos
11/4/10 Douglas Barnshaw
11/4/10 John Baker
11/5/10 Teresa Frankhauser
11/5/10 Nidhin Joseph
11/5/10 Doretta Moreau
11/6/10 Stephen D. Thibeau
11/6/10 Curt M. Freedman, PE
11/6/10 Michele Richard, R.N., M.P.H.
11/7/10 Sandra Kosterman
11/7/10 Donald J. Carr
11/7/10 Charles Kosterman
11/8/10 Springfield Public Health Council
11/9/10 City of Springfield/Office of Planning and Economic Development
11/9/10 Massachusetts Sierra Club
11/8/10 Donna Mollard
11/8/10 Walide Soufane
11/8/10 Jill Miller
11/8/10 Herman Wilkinson
11/8/10 Donna Jago
11/8/10 Robert G. O'Leary, Esquire
11/8/10 Angela DeLeonardis
11/9/10 Janice Wilson
11/9/10 Juliane Barbeau
11/9/10 Patrice Pare
11/9/10 Glen A. Ayers, R.S., C.H.O.
11/9/10 William J. Balsom
11/9/10 Diana Valentine
11/9/10 Conservation Law Foundation
11/9/10 Massachusetts Audubon
11/9/10 Massachusetts Department of Public Health/Bureau of Environmental Health (MDPH/BEH)
11/9/10 Toxics Action Center
11/11/10 Claudia Hurley
11/11/10 Mitchell Rosenthal PE
11/15/10 Massachusetts Department of Environmental Protection/Western Regional Office (DEP/WERO)

IAB/CDB/cdb