

Written Public Comment for Fall River Meeting 12/18/17

My name is Stephanie Sloman. I live in Burrillville RI. I am a retired environmental engineer.

I watched the Watuppa Water Board Meeting video dated Aug. 17, 2017 and the Fall River City Council meeting video dated Oct. 24, 2017. I have read the signed water agreement between the Watuppa Water Board and Benn Water & Heavy Transport. I would like to share some thoughts, observations, opinions and facts with you.

Some observations concerning the Watuppa Water Board's video dated Aug. 17, 2017.

- 1- It did not appear that the board had the "draft" agreement in front of them when it was discussed. It seemed that the board members had not even seen the water agreement.
- 2- The water agreement was continuously called a "draft" agreement.
- 3- There was no mention in that video about the fact that the water would supply process water to an energy facility. It was discussed that the company (Benn Water) was a "pool filling" company. Specifically, one board member asked what would Benn Water do with the water. The answer was that it also sold water to "landscaping companies". There was never a mention of an energy facility.
- 4- It was discussed about the price of water in the Water Supply Agreement. It was stated that the Watuppa Water Board would charge \$0.012/gallon to Benn Water. It was also stated that this price was approximately double what the Water Board would charge to other "pool filling" companies. This is FALSE. If you look at Fall River's Water and Sewer Rates, "Price List, Summary, as of 7/5/17, Fees Set by Watuppa Water Board or F. R. Sewer Commission", it shows that the price in the signed water agreement is the same. It is not double what the Watuppa Water Board would charge other "pool filling" companies.
- 5- It was discussed in that meeting video that the Watuppa Water board would get \$72 per 6,000-gallon tanker. It is true that in the Fall River Watuppa Water Board's price list states this, but in the signed water agreement it states that the capacity of the Benn Water tankers are 8,000 gallons. So what would the Watuppa Board charge for a 8,000-gallon tanker load of water?

It seems that the mayor signed a "draft" water agreement in that the "substance" in that water agreement never changed.

Some observations concerning the City Council meeting video dated Oct. 24<sup>th</sup>:

- 1- It was stated that the water would be used for "dust control". If you read Invenergy's submission of their Water Supply Plan Supplement to the EFSB, it does not mention anything about process water for dust control. It states that the secondary/contingent water supply will be used "to meet all the water requirements of the Facility".
- 2- The water agreement is for 3 years starting with a payment in March 2018. The proposed power plant, if approved, would not begin operations until June of 2021. So I suppose that any water from the Watuppa Water Board would be used for "dust control". Again, there is no mention ANYWHERE about the water needs of the proposed power plant for dust control during construction.

**THIS IS IMPORTANT:** Invenergy submitted a "Water Supply Plan: Supplement" to the RI Energy Facility Siting Board on September 28, 2017. In it there is a paragraph in which several sections are "blacked out". These "blacked out" sections is Fall River! It states the following: "*Pursuant to Section 4 of the Benn Water MOA, CREC and Benn Water conducted the due diligence associated with these contingent suppliers, and Benn Water subsequently executed a long-term firm reserve capacity water supply agreement with the [blacked out section]. Benn Water will supply water to the Facility for process water makeup, as a contingent water supply, from [blacked out section]. This reserve capacity supplier [blacked out] would be able to meet all the water requirements of the Facility throughout the year without needing to draw on the other contingent water suppliers. The quality of the water available from [blacked out] is municipal drinking water. [Blacked out] water treatment plant has a reported capacity of over 26 Million Gallons per Day ("MGD"), and has ample available capacity to meet CREC's needs."*

([http://www.ripuc.ri.gov/efsb/EFSB2/SB2015\\_06\\_Inv\\_Water\\_supplement.pdf](http://www.ripuc.ri.gov/efsb/EFSB2/SB2015_06_Inv_Water_supplement.pdf))

Why did Invenergy black out the secondary water source (Fall River Water Division) in its “Water Supply Plan: Supplement”? It is quite simple. They knew that the agreement was done in secret and could be legally fought. Invenergy knew and still knows that using pristine drinking water for non-contact water processes is WRONG!

Invenergy is not a “fracking” company. It will however, if approved, use ONLY fracked gas from other states to our west who, by the way, are fighting these fracking companies.

The Watuppa Water Board stated at the city council meeting that they would never agree to sell Invenergy 1 Million gallons per day. I hope that they meant it because if Fall River becomes the primary source of water, there will be days during the dead of winter when the Project will need upwards of 1.5 million gallons of water (when it fires 2 turbines with diesel fuel). Invenergy, through Benn Water, has that covered in the water agreement by stating: “If Benn exceeds the breakpoint of eight (8) million gallons in any one calendar year, Benn shall pay a Retroactive Capacity Reserve Payment for that year equal to an additional \$20,000.” There is no annual “maximum” cap water usage in this agreement. Let me be specific here. It is well known that this Project will use between 12 and 30 million gallons per year depending on weather conditions. The maximum volume of water per day could be up to 1.5 million gallons per day for up to 30 days. Doing the math, this is upwards of 188 diesel trucks or 376 diesel truck-trips up to Bedford Street.

The maximum daily water from Fall River is listed in the water agreement as “up to 88,000 gallons” which equates to 11 diesel trucks per day. However, if the tankers are 6,000 gallon capacity, this is 15 trucks per day or 30 truck trips per day. In a 10 hour day, this equals 1-2 diesel trucks per hour or 2-4 truck-trips per hour. I believe that Invenergy believed that this 88,000 gallon maximum listed in the water agreement could be changed during the process.

The Watuppa Water Board after being asked by Councilman Joseph Camara stated that there would be “no lining up of trucks on Bedford Street and no idling of trucks” and that it was all “built into the agreement”. This is true that it is in the agreement, as you know. But what about idling and lining up on other roads besides Bedford Street? The agreement only mentions Bedford St. In Exhibit A “Delivery Procedures”, it states: “Benn shall not have trucks line up or idle outside of the gates that separate the Water Department Facility from Bedford Street.” (Invenergy/Benn Water did not supply a water truck route to the Watuppa Water Board, did it? According to my research there are several route options and several other roads/streets on which the water trucks could line up and idle.)

The Watuppa Water Board member said that Fall River is permitted for 14.59 MGD and that it uses 10 MGD now which leaves 4.59 MGD as a surplus. This may be true, but didn’t I hear a council member (later in the meeting) say that there was planned a renaissance or re-birth of Fall River? To me, this means more businesses, more jobs, and perhaps more residents. Certainly it would mean more tourism. Doesn’t this mean that your water should be protected for this revival of Fall River? If this is Fall River’s “dream” or plan, it will need more water for the future.

The Watuppa Water Board member stated that the only expense “is the value of the water”. There is no mention in the agreement (that I could find) concerning who would have to pay for the damaged roads. The volume of truck traffic will certainly cause some damage.

In response to one of Vice-President Pereira’s questions, the Watuppa Water Board/Fall River Water Division stated: “By the contract we are not required to sell them more water than the maximum authorized amount. So we will not be selling them 1 million gallons of water...we will not be having the number of trucks that were alleged at the citizen’s input time at all.” Remember that 88,000 gallons per day equals 11 trucks per day (or 22 truck trips/day) for an 8,000-gallon tanker or 15 trucks per day (or 30 truck trips/day) for a 6,000-gallon tanker. So for a 12 hour window that the trucks can fill up at 1620 Bedford Street, this means that there could be between 1 – 2 trucks per hour or 2 – 4 truck-trips per hour will be traveling Bedford Street and other roads (unknown at this time because Benn Water did not include a “Water Route”).

In the Watuppa Water Board meeting video, someone talked about the fact that at that hydrant on Bedford St, there has been rust in the water. This rust may cause a “problem” with Invenergy’s systems. What will Invenergy do if the

rust in the water does indeed cause a problem with their “processes”? Will Invenergy seek compensation for these process problems due to the rust?

What about the emissions of these diesel trucks? How will your residents deal with these emissions especially during the summer months when children are outside playing? There are 2 schools in the proximity of Bedford Street and there are 9 School Bus stops on Bedford Street.

What about the noise of these diesel trucks? Each diesel truck emits approximately 85 dBA (from 50 feet from the centerline of the road). The World Health Organization (WHO) recommends that people should only be exposed to 50 dBA—over that limit it is possible for hearing damage (especially for children and senior citizens).

The bottom line is this: If Invenergy cannot find a water supply (primary or contingent/secondary), it will have NO chance to be approved by the RI Energy Facility Siting Board. As your fellow City Councilors stated (especially, Councilman Steven Camara) during the City Council meeting on October 24, 2017, Fall River is indeed part of the “region”. This “region” will be negatively impacted by this proposed power plant via air pollution, water pollution and the unnecessary use of drinking water (via aquifers) in the region. Air and water pollution “knows” no boundaries. All the aquifers are linked together under the earth. We are all at risk.

I truly hope that you and the City Council will be able to find a way to make the agreement null and void. If this is not possible, I hope that the City Council will make sure that this water agreement is not extended.

Water is life. Shouldn't Fall River's drinking water only be used for its residents and its businesses and NOT for a power plant which will definitely negatively impact the lives of residents of any community... especially one so close to Fall River.? And what of the wildlife? Any water that Fall River does not use will flow naturally and will help the environment and wildlife of your community.

Thank you.