



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 1
5 POST OFFICE SQUARE, SUITE 100
BOSTON, MA 02109-3912

July 11, 2013

Kimberly D. Bose, Secretary
Federal Energy Regulatory Commission
888 First Street, N.E.
Washington, DC 20426

Re: Northfield Mountain Pumped Storage Project, FERC Project No. 2485-063
Turners Falls Hydroelectric Project, FERC Project No. 1889-081

Dear Secretary Bose:

On April 15, 2013, pursuant to the regulations of the Federal Energy Regulatory Commission (FERC), 18 C.F.R. § 5.11, FirstLight Hydro Generating Company (FirstLight), a subsidiary of IPR-GDF SUEZ North America, Inc., Licensee of the Turners Falls Hydroelectric Project (FERC No. 1889) and the Northfield Mountain Pumped Storage Project (FERC No. 2485), filed its Proposed Study Plan (PSP) for the relicensing of the Turners Falls Project and Northfield Mountain

EPA is providing comments on a portion of the PSP, specifically Section 3.1 Geology and Soils, focusing those portions of the proposed studies which deal with management measures available to minimize sediment transport from the Upper Reservoir at Northfield Mountain during and after maintenance drawdowns.

In June, 2010 EPA Region 1 issued an Order for Compliance to FirstLight concerning unauthorized discharges of sediment to the Connecticut River which occurred during a drawdown of the reservoir. Part of EPA's Order includes the requirement that FirstLight submit a report identifying measures to prevent discharges of sediments associated with draining the pumped-storage reservoir in the future and a schedule for their implementation. Subsequently FERC staff on January 20, 2011 requested a plan to avoid or minimize the entrainment of sediment in the Project works during Upper Reservoir Maintenance drawdowns. A Sediment Management Plan (Plan) was developed in consultation with EPA and Massachusetts Department of Environmental Protection and filed with FERC on July 15, 2011. It contains proposed methods to assess sediment dynamics in the Project's Upper Reservoir as well as the Turners Fall impoundment. According to FirstLight, the final report will contain standard operating procedures and protocols to determine when the Plan will be implemented. These procedures and protocols will be developed in consultation with EPA and MA DEP.

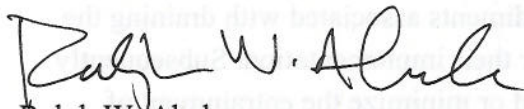
EPA's believes that the work being carried out during the Plan for the Northfield Mountain Project must be fully integrated into the FERC licensing process for the project. The proposed study plan does not adequately do that. If done properly, the results of the Plan, which are designed to avoid or minimize silt into the project's works, would be incorporated into future license conditions for the project. EPA and MA DEP are engaged in ongoing discussion with FirstLight about details of the Plan including an assessment of various sediment management techniques for the Project.

An important element of the Plan is real time monitoring of Total Suspended Sediment (TSS) in the Connecticut River and within the intake channel of the Upper Reservoir. Results of this monitoring, especially in the Connecticut River, should be useful in terms of a better understanding of sediment transport in this portion of the river. However, no provision is made for incorporating this information in the proposed studies as written. EPA believes that this information should be incorporated into the Plan.

According to the licensing schedule for the project updated study reports will be filed by 9/12/2015. At the same time, the Proposed Study Plan states that a final Sediment Management Plan will be submitted to FERC by December 1, 2015. The licensing schedule calls for a Draft License Application by December 4, 2015. This is a very tight schedule for comments and review of the Plan, especially with respect to incorporation of Plan results into the License Application. It seems prudent to require a nearly Final Sediment Plan be filed at the same time as all of the other study reports. That would allow sufficient time to incorporate the results into the License Application.

Thank you for the opportunity to comment on the Proposed Study Plans. If you have any questions about EPA's comments please contact me at (617)918-1629, abele.ralph@epa.gov or Toby Stover at (617) 918-1604, stover.toby@epa.gov.

Sincerely,



Ralph W. Abele

Water Quality Branch
Office of Ecosystem Protection
EPA Region 1

Document Content(s)

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