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Base Blackstone cleanup plan on science and common sense

AS I SEE IT

By Robert L. Moylan Jr.

Everyone wants clean water. Everyone wants streams, lakes and bays that are healthy and inviting for recreation and aquatic life. But nothing is free, and we must decide what these amenities are worth to those footing the bill. Recently the Upper Blackstone Water Pollution Abatement District received its draft discharge permit from the federal Environmental Protection Agency. And once again, ratepayers of Worcester face the unfair burden of paying for yet another expensive governmental order. We are not questioning the intent or the noble goal of restoring the Blackstone River to a place where we can fish or swim. We embrace it. We, too, want a clean Blackstone and a healthy Narragansett Bay. But we want to achieve those conditions with careful planning based on proven science that guides our decisions and we want the decisions to be cost-effective. We want the benefits of our choices to justify the costs because it is the ratepayers who will pay for them — not the federal or state government. The latest draft permit from EPA and the state Department of Environmental Protection imposes yet another multi-million dollar expense on top of the existing \$180 million project now under way at the Upper Blackstone District. They are issuing this permit without the scientific basis that we demand, without identified benefits that justify the cost and without any financial contribution! As commissioner of public works and parks for Worcester and as chairman of the district, I find this mandate outrageous.

The Upper Blackstone facility treats sewage from Worcester and six surrounding communities. The district is financed by each of the communities served based on use, with Worcester paying 90 percent of operating costs. The current \$180 million upgrade has increased Worcester's treatment costs more than 300 percent in four years and more will come. As a result, our sewer rates have more than doubled in four years. To impose further costly requirements on us and other communities without justification is simply wrong.

In 2001, the Upper Blackstone District and EPA negotiated the discharge amounts of phosphorus (0.75 milligrams per liter) and nitrogen (no limit). EPA based these limits on their river model, and this model remains their only guidance today. The EPA believed then that these were the limits needed to improve conditions in the river and to benefit Narragansett Bay (40 miles away). Now, EPA wants to lower the phosphorous limit to 0.1 milligrams per liter and total nitrogen to 5 milligrams per liter. We ask: Why? What has changed? We await answers.

Here are my specific issues relative to EPA's position:

- The timing of the permit is poor and illogical. We are scheduled to complete the current upgrade project in two years. We believe it makes sense to operate the

plant for two full seasons beyond the completion date to assess the capabilities of the new plant. At that time we will know if the plant consistently meets the nitrogen and phosphorus limits. Other facilities along the river and around Narragansett Bay are also being upgraded and it makes sense to see how the river fares with all of these upgrades before imposing further mandates. Moreover, by July 2007, the Upper Blackstone District will have a new model of the river developed by its environmental consultants, CDM, and the UMass School of Engineering. The model, together with the results obtained by operating the improved plant, will give us the needed science to guide rational decision-making.

- There is no evidence that the proposed nitrogen limits will improve the water quality in the Blackstone River or Narragansett Bay. The DEP, other Rhode Island dischargers, and the Narragansett Bay Commission all have challenged the science of the new nitrogen limit.
 - The facilities currently being built by the district have predictable costs which are based on “sustainable” treatment processes. If new facilities are to be built to achieve the latest proposed limits, the treatment processes will not be “sustainable” and much larger quantities of chemicals and about 20 percent more electricity will be used. Such a facility will have a massive negative environmental and economic impact.
 - While we know the potential negative impact, we don’t know what the benefits will be from the new limits. Shouldn’t we, as the ratepayers who are footing this bill, definitively know if another \$200 million to build the plant and an additional \$50 million to operate it annually will provide a commensurate benefit?
- Our preferred approach is to complete the new river model in 2007, finish the current \$180 million improvements in 2009, optimize and fine-tune the new facilities, and monitor the results. In 2012 we would review and revise as needed. If we find that the new plant is not meeting standards or more stringent limits are needed to make a proven difference in water quality, the district would then undertake reasonable upgrades.

If the above approach is not accepted by the EPA, then we will be forced to appeal the permit through the courts. This process could take years and will potentially not be resolved any sooner than 2012, the date of our more rational process.

A public hearing on this subject is scheduled for 7 p.m. May 9 at Quinsigamond Community College. I encourage all who are concerned to attend and to voice their opinions.

Robert L. Moylan Jr., PE, is commissioner of Public Works and Parks for Worcester.

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