

Brockton **Clean** Energy

If you consult a dictionary, there are many definitions and usages of the word clean. Most list this one, from Merriam-Webster, or similar, either first or in the first few, “**1 a : free from dirt or pollution**” as it is used here.

While Brockton Power Company, LLC now calls itself “Brockton Clean Energy,” it simply is not. It may be **less dirty** but it is not clean. **Brockton already has a clean energy producing facility** in the solar field that makes up Brockton’s Brownfields to Brightfields project for which the city has received well deserved praise. Solar energy is **clean**. Wind produced energy is **clean**. Geothermic production of electricity is **clean**. Even nuclear power, despite its other risk factors, has no inherent production of dirt or pollution and, therefore, could be called **clean**.

Brockton Power Company, LLC proposes a fossil fuel fired (natural gas and Ultra Low Sulfur Distillate [diesel]) electrical power generating plant. **The burning of any fossil fuel produces some emissions.** The ENF (Environmental Notification Form) Certificate issued by the Massachusetts Executive Office of Energy and Environmental Affairs (EOEEA) states “Emissions associated with the project include: 82 tons per year (tpy) of particulate matter; 98 tpy of Carbon Monoxide (CO); 7 tpy of Sulfur dioxide (SO₂); 17 tpy Volatile Organic Compounds (VOC); 87 tpy of Oxides of Nitrogen (NO_x); 1,134,000 tpy of Carbon dioxide (CO₂); and less than 10 tpy of Hazardous Air Pollutants (HAPs).” This is a **combined average of over 6 million pounds per day**.

Admittedly, it **may be the least dirty fossil fuel technology** available today, but it still produces all the emissions listed above. In fact, the certificate later states, “The project requires a mandatory EIR [Environmental Impact Report] and an Air Quality Permit from MassDEP. Therefore, it is subject to the EOEEA Greenhouse Gas Emissions (GHG) Emissions Policy, which requires GHG information to be provided during the MEPA process.” Further, it details “The proponent has provided an estimate of CO₂ emissions in the ENF; the DEIR should update this figure as necessary. In accordance with the EOEEA Greenhouse Gas Emissions Policy, the DEIR should identify and describe all greenhouse gas emissions associated with the project and should propose measures to avoid, minimize and mitigate project-related greenhouse gas emissions. The proponent should consider the six GHGs covered by the Kyoto Protocol: carbon dioxide (CO₂); methane (CH₄); nitrous oxide (N₂O); hydrofluorocarbons (HFCs); perfluorocarbons (PFCs); and sulfurhexafluoride (SF₆). The proponent should consider both direct GHG emissions (e.g. stack and fugitive emissions from the proposed power plant) and indirect emissions (e.g. emissions from vehicles driven by employees and delivery trucks).” These are the **greenhouse gasses** (GHG) associated with the current debate over the spread of **global warming**.

Perhaps more importantly, will this plant exceed any of the set limits in its emissions in the next thirty or so years and yet be allowed to continue to operate at these excessive levels as has happened at other facilities throughout the state?

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Although Brockton Power Company, LLC denies it was a factor in sighting this plant in Brockton, according to the EOEEA ENF Certificate, “The project exceeds an ENF threshold for air and is located within five miles of an Environmental Justice (EJ) population. Therefore, it is subject to the EOEEA Environmental Justice Policy requirements for enhanced public participation under MEPA.” EJ populations include minority and low-income populations established under Executive Order 12898.

While Brockton’s unemployment is at a relatively low level, it disproportionately affects these same populations, few if any of whom will qualify for the twenty or twenty-five permanent jobs that will be supported by this facility for the next thirty or more years. Does Brockton want another business that only further marginalizes its diverse community or does it want more businesses that maximize this diversity in providing jobs that proportionately serve the majority of Brockton area residents?

Although originally purported that Brockton Power Company, LLC’s European partner Advanced Power AG of Switzerland was operating some plants in Europe (“many”, “at least a half dozen”, “several” according to various spokespersons for Brockton Power Company, LLC at various times), the website for that partner identifies only three total projects in its three year or so existence, two of which are still “under development” and one listed as “successfully developed” was sold to another firm to manage.

Although the project as proposed would use “reclaimed” water from the **Brockton Wastewater Treatment Plant** (affectionately referred to by Brockton Power Company, LLC in the proposal as the “Advanced Water Reclamation Facility”), a spokesperson revealed recently that they have an alternative plan to use the desalinization water when that facility comes online. While the reclaimed water would result in 1.5 million to 2.0 million gallons less per day in the water discharged from the wastewater treatment plant (currently exceeding permitted limits), the use of “desal” water would **add 400,000 to 500,000 gallons per day** to that already excessive discharge. In fact, Mayor Harrington’s July 7, 2007 letter of conditional support for the power plant proposal to the EOEEA states, in part, “...the most important element of this proposal is the use of treated water from our Waste Water Treatment Plant. The City of Brockton is currently under a court order to upgrade the plant for an estimated \$80 million.” Further, he states, “The only drawback that we now face is that we are no longer allowed to put more treated water in the river.” And, if it does use “reclaimed” water, what will happen if incompletely treated water is evaporated into our air at a rate of 1.5 million to 2.0 million gallons per day?

The City of Brockton and the Brockton 21st Century Corporation, acting as the city’s economic development agency, needs to rethink its priorities when bringing new business to Brockton. And why is it that at least three members of the Brockton 21st Century Corporation’s board have paid engagements representing Brockton Power Company, LLC either directly or indirectly?

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