



Green Mountain Conservation Group
P.O. Box 95
Effingham, NH 03882
(603) 539-1859

Mitchell Locker, P.G.
NH DES/ DWGB
Groundwater Recharge Program
PO Box 95
Concord, NH 03302-0095

August 14, 2019

Dear Mr. Locker,

On behalf of the Board of Directors of the Green Mountain Conservation Group (GMCG), a multi-town watershed organization that includes the towns of Eaton, Effingham, Freedom, Madison, Ossipee, Sandwich and Tamworth, NH as well as Porter and Parsonsfield, Maine, I write to you with concerns about a Groundwater Discharge Permit application from Pinetree Power –Tamworth LLC Id#: 199407004 dated 6/28/2019. The application is for the discharge of up to 100,000 gallons of effluent a day from washing of the cooling stacks at the biomass plant in Tamworth, New Hampshire.

Pinetree Power is located in the Ossipee Watershed and a critical recharge area of New Hampshire's largest stratified drift aquifer. Due to this important drinking water resource and the transmissivity of the soils, we urge the Department of Environmental Services and particularly the Drinking Water and Groundwater Bureau to deny the application as submitted until further research can be conducted and residents can be assured that the discharge of effluent from washing of the cooling towers will not contaminate ground water resources.

In addition to the effluent discharge proposal being located over this critical drinking water resource, GMCG has further concerns that the abutters have not been noticed of this proposal or when the temporary permit was granted earlier in 2019 to discharge effluent over a period of months. Abutters include three adjacent towns as well as over 100 residents. While Pinetree Power is located in Tamworth, it is within close proximity to the towns of Madison, Freedom and Ossipee. This discharge of 100,000 gallons a day is large enough that the Selectmen in all three of the towns should be given notice. As health officers in their towns, they need to be able to speak on behalf of their citizens whose wells and drinking water may be impacted by the effluent. Homeowners located within 1000-2000 feet of this discharge should also be noticed. There are 57 homes in a Well Head Protection Area that is located just 100 feet outside of the designated protection area. There is strong evidence that the discharged water will flow in the direction of these community wells and the homeowners and water district supervisors should be noticed. While it may not be illegal to not notice these abutters, drinking water is one of the most critical shared resources for a community and it appears irresponsible that those residents were not noticed prior to the test discharges.

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Tax Information

GMCG's EIN number:
02-0498020. Your
donation is tax-
deductible to the full
extent of the law.



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Over the past ten years, GMCG has partnered with Smith College on a ground water sampling baseline database and found the water nearly pristine. To discharge 100,000 gallons a day of non-potable brine is not appropriate in this area where recharge to the aquifer is at such a high rate.

As you know, a stratified drift aquifer is very vulnerable to contamination.

GMCG was founded in 1997 to protect shared drinking water resources particularly this very large stratified drift aquifer. In our tenure, we have prided our conservation work on a collaborative approach and have strived to partner with businesses and municipal officials to find solutions that will allow businesses to operate without negatively impacting our shared drinking water resources. Some of GMCG's Advocacy work on drinking water protection since 1998 has included:

- Creating and distributing the Natural Resource Guide Book in partnership with town planning boards to guide development in ways that will protect shared resources;
- Partnering with municipal officials and local regional planning commissions to create Aquifer Protection Ordinances in 6 of the 7 towns in partnership with NH DES Non-point Source Water Protection Bureau;
- Partnering with Smith College to create a recharge map of this Aquifer in combination with establishing a well water baseline data base;
- Creating and distributing the Ground Water Vulnerability Study in partnership with NH DES Source Water Protection Bureau.

Well water is a critical but invisible resource. Most people in the Ossipee Watershed take their drinking water from private wells. The proposal by Pinetree Power to discharge 100,000 gallons a day of non-potable "brine" from the cooling towers on the border of four towns and in the close proximity to over 100 homes is not acceptable. More research needs to be conducted to make sure that the aquifer will not be impacted by this proposal. The aquifer does not know political boundaries. The towns, residents and homeowners in the vicinity of this effluent discharge should be included in public discussion about any concerns they may have about their drinking water. Once well water is compromised it is incredibly costly to mitigate.

The Green Mountain Conservation Group respectfully asks you to review the research from the Ossipee Aquifer Advisory Committee submitted with this letter and conclude that the application as submitted needs to be denied. Thank you for your time and thoughtful review of this critical matter.

Sincerely,

Blair Folts
Executive Director
Green Mountain Conservation Group

CC: Governor/DES Commissioner/DES Susca/Rigrod/Towns of Effingham, Freedom, Madison, Ossipee, Tamworth/Pinetree Power/