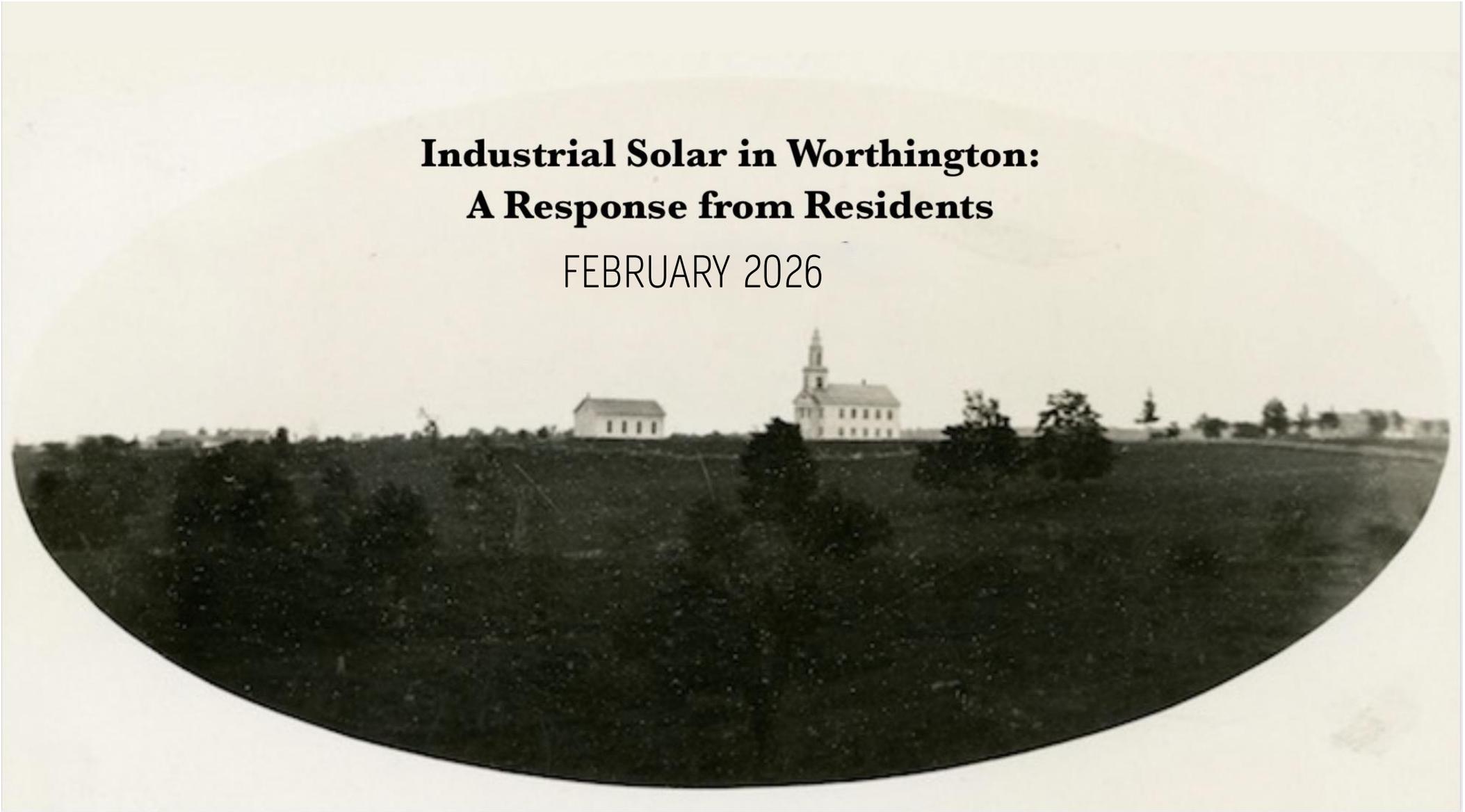


**Industrial Solar in Worthington:  
A Response from Residents**

FEBRUARY 2026



A close-up photograph of water droplets falling from a faucet. The droplets are in various stages of falling, with some just starting to detach and others further down. The background is a soft, out-of-focus light blue. The word "WATER" is centered in the middle of the image in a bold, black, sans-serif font.

**WATER**

# WORTHINGTON

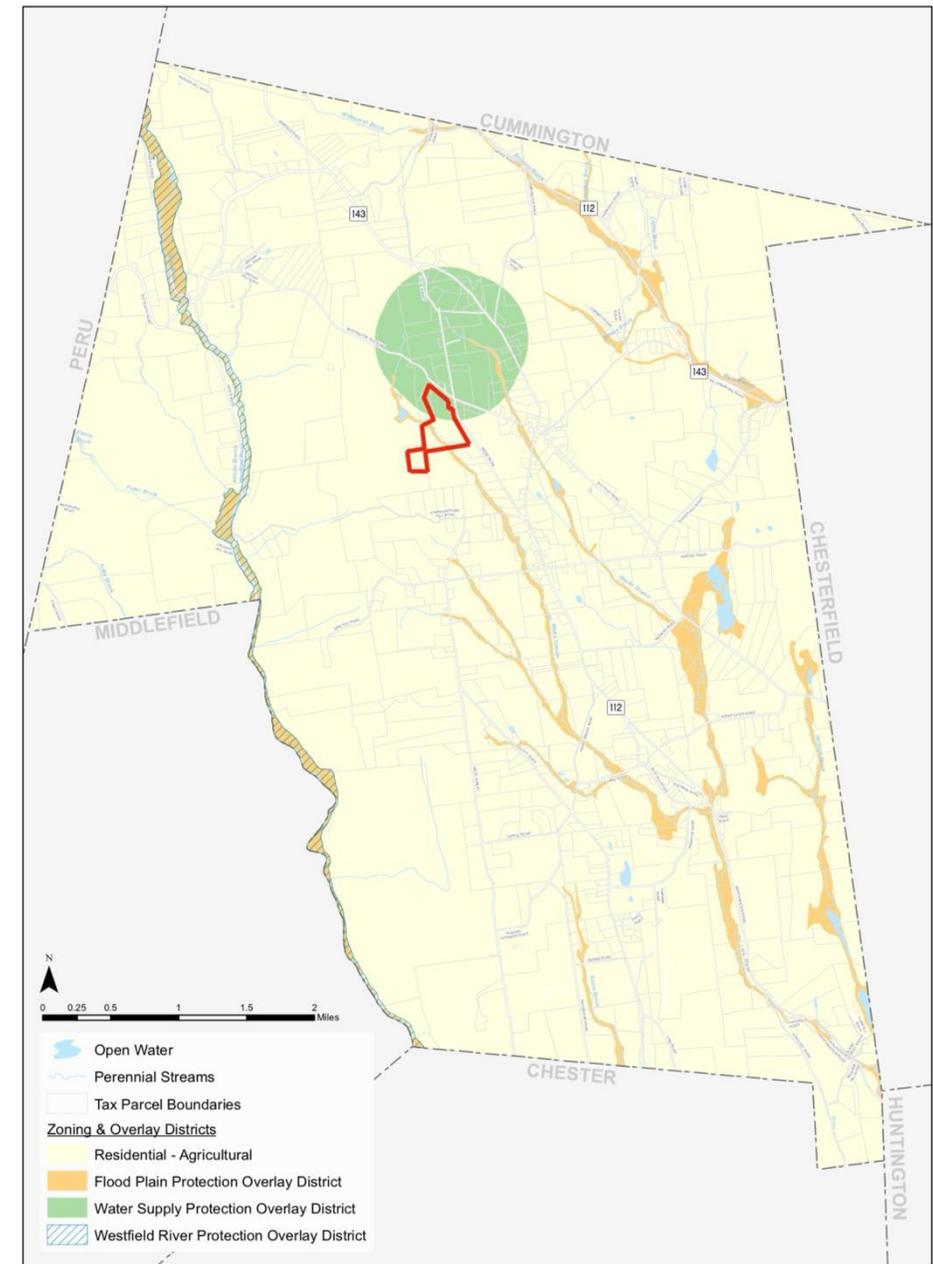
## WATER PROTECTION DISTRICT

WHAT WE DO HERE HAS A DIRECT IMPACT ON  
THE ENTIRE WESTFIELD RIVER WATERSHED

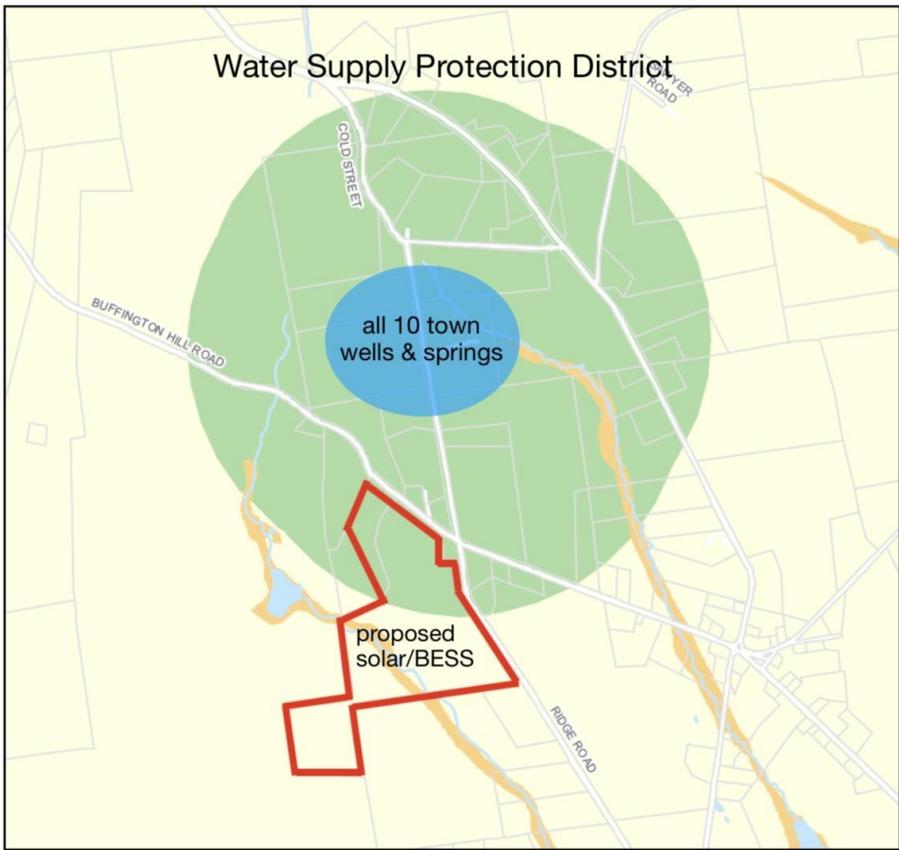
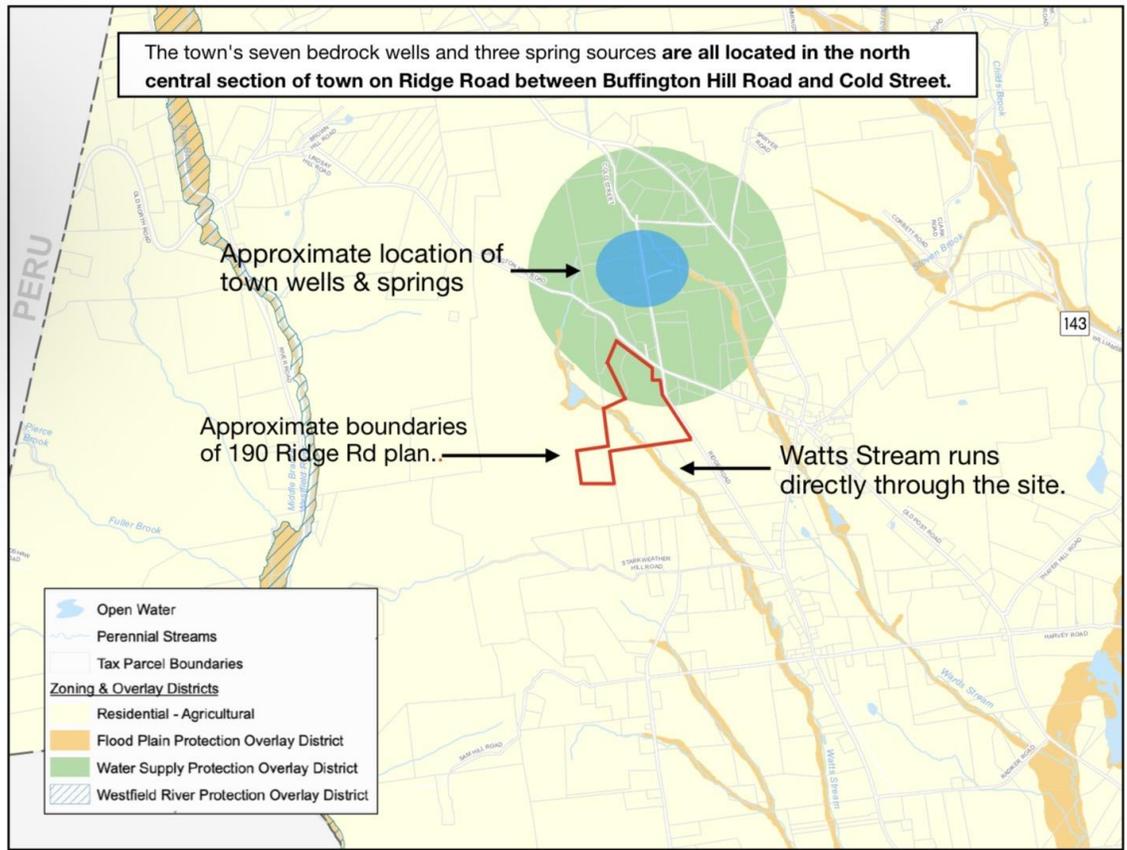
- The Water District, shown in the green circle, has ten sources of water in an aquifer with high vulnerability to contamination
  - 7 bedrock wells, 3 springs, all fed from fractured bedrock groundwaters
  - Fractured bedrock has no significant hydrogeologic barrier to prevent contamination migration (unlike gravel and sand aquifers)
- The system provides 168 service connections to approximately half our town residents, and to 50 hydrants
- The proposed site at 190 Ridge Road is outlined in red, directly within the water district

We've experienced the threat to our water supply previously:

A fire at an agricultural site in 1983 released toxic chemicals into the groundwater contaminating wells requiring the town to supply water to the affected residents



Approx. boundaries of BlueWave site in red.

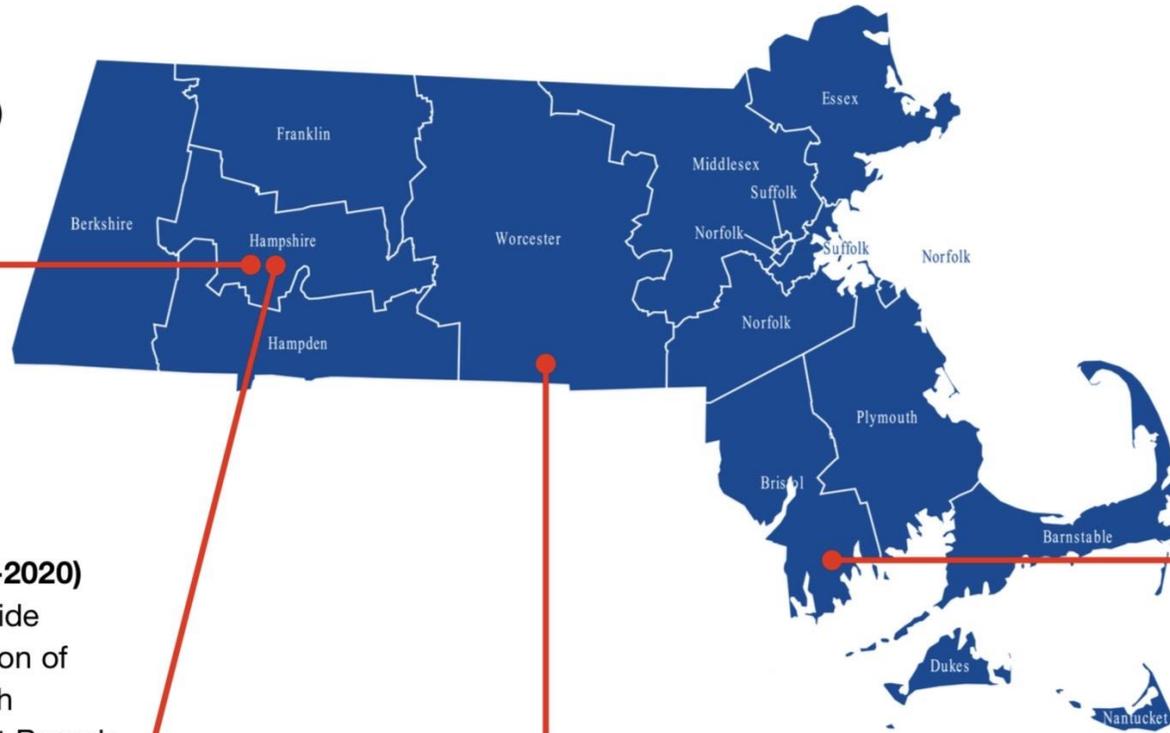


Worthington Source Water Protection Plan, 2005.

# Recent Alleged Water Violations by Solar Companies in Massachusetts

## CS Energy & Eversource (2021)

Illegal stormwater discharge caused wetlands and water pollution in Southampton.



## Dynamic Energy Solutions (2018-2020)

Extreme sediment discharges, hillside erosion, stream scouring, destruction of stream beds, filling of wetlands with sediment, and pollution of the West Branch Mill River in Goshen and Williamsburg.

## BlueWave Solar (2024)

According to the Conservation Commissions of Douglas and Sutton, erosion control measures repeatedly failed, leading to sediment runoff into adjacent wetlands, roadsides, ponds, and the Mumford River.

## Navisun LLC (2024)

Clean Water Act violation: sediment-laden runoff impacting pond/well water in Acushnet.

## BlueWave in Douglas and Sutton

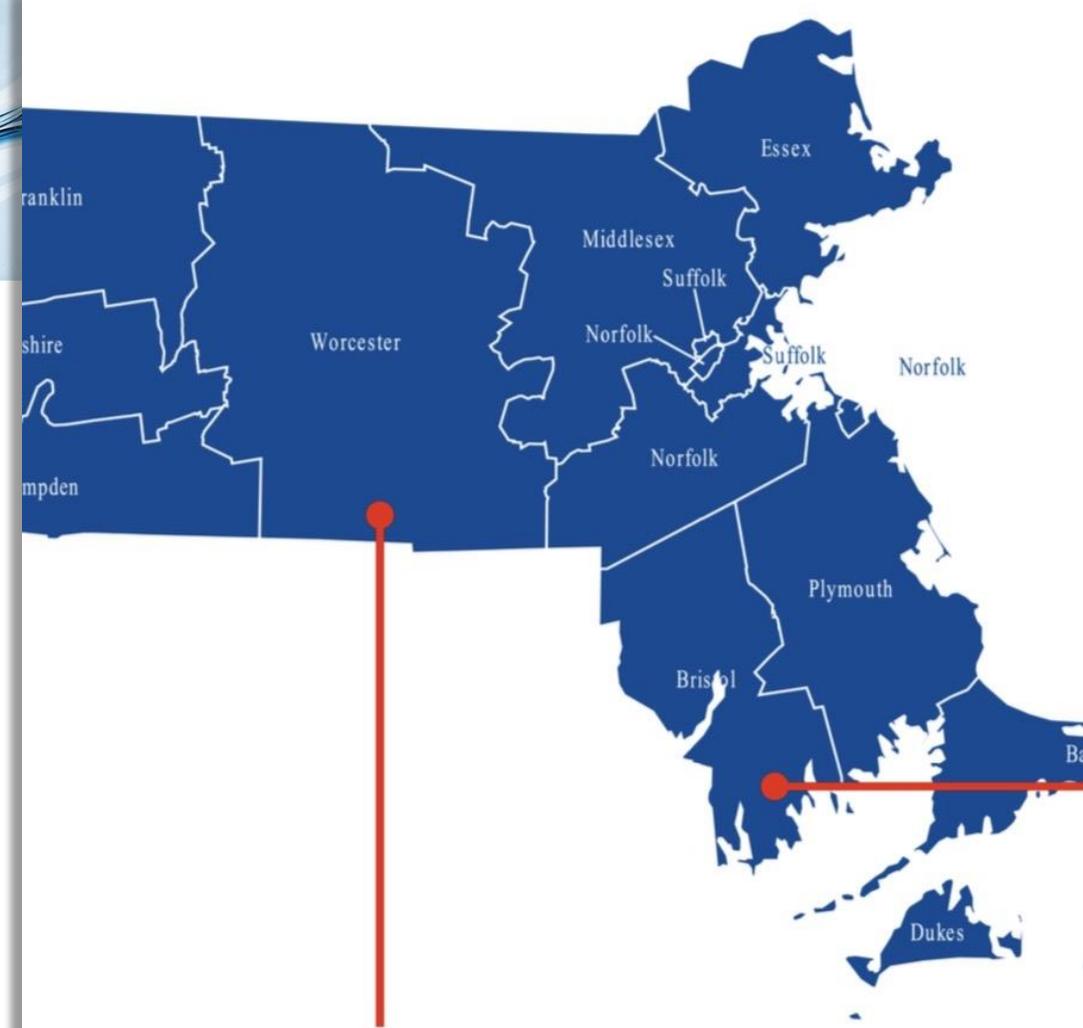
Residents called out that stormwater and construction runoff were flowing into neighboring properties causing erosion

Initial infiltration basins and drainage systems failed to contain water properly

Town conservation officials issued enforcement orders and required BlueWave complete stabilization and basin work- but it was too late to prevent issues

The Manchaug Pond Foundation claimed that testing indicated the presence of 6 PFAS chemicals in the soil or water near the site

This alleged failure should disqualify BlueWave from building anywhere near our town's only water supply.



### **BlueWave Solar (2024)**

According to the Conservation Commissions of Douglas and Sutton, erosion control measures repeatedly failed, leading to sediment runoff into adjacent wetlands, roadsides, ponds, and the Mumford River.

# FOR WORTHINGTON

## THE RISKS ARE TOO GREAT

Town of Warwick NY after a December 2025 fire:

The third fire in three years at the site

...Let me be clear, the current technology surrounding battery energy storage facilities is not reliable enough to justify placing these facilities in or near our neighborhoods...Supervisor Jesse Dwyer

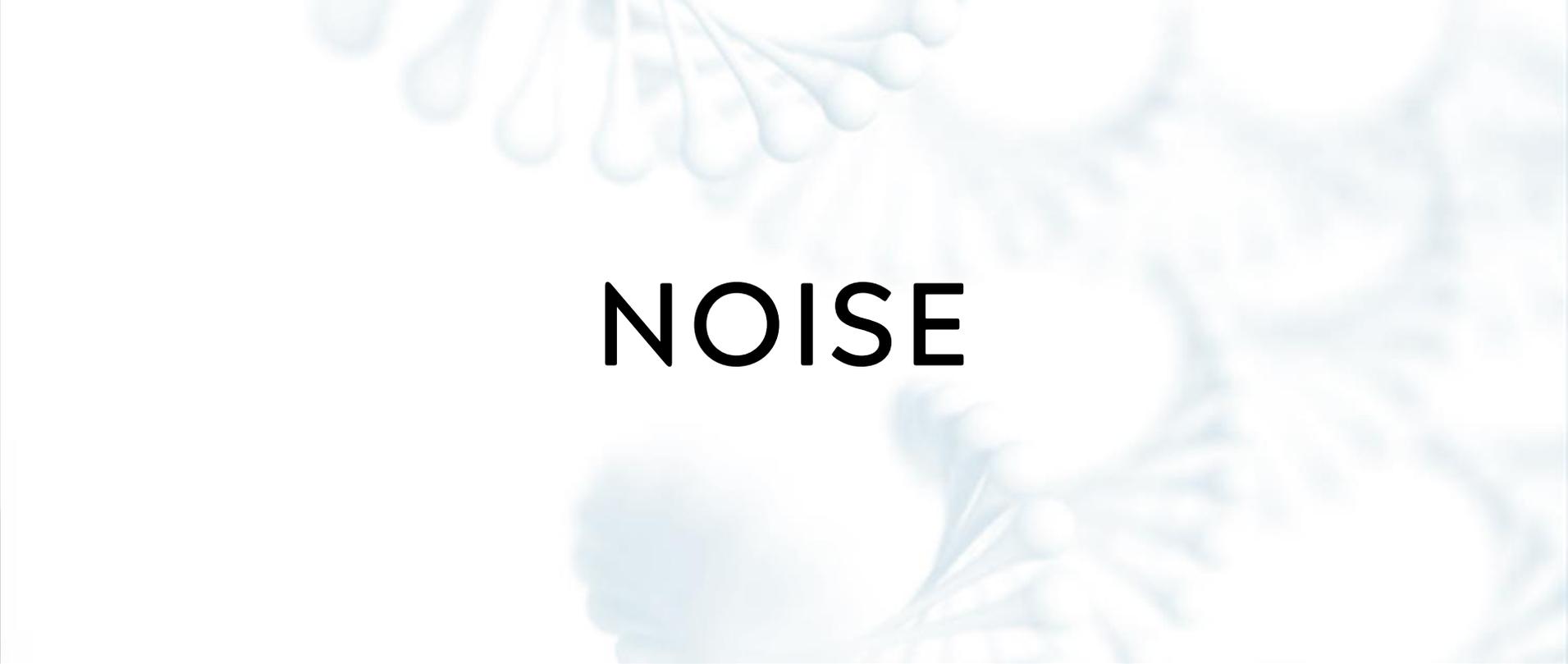
SOLAR BESS SYSTEMS CATCH ON FIRE AT A RATE OF 1 PER MONTH ACROSS THE US, THEY ARE EXTREMELY DIFFICULT TO EXTINGUISH AND CAN BURN FOR DAYS, TAXING OUR MUTUAL AID FIREFIGHTERS BEYOND LIMITS, AND SPEWING TOXINS INTO OUR ATMOSPHERE, RISKING THE ENTIRE TOWN

- BATTERIES AND PANELS CONTAIN HIGHLY TOXIC MATERIALS THAT CAN CONTAMINATE GROUNDWATER

- SITING AN INDUSTRIAL INSTALLATION SO CLOSE TO WATER SUPPLY, OUR SCHOOL, TO RESIDENTS, TO WILD & SCENIC WATERWAYS, AND TO WILDLIFE, IS AN UNACCEPTABLE RISK

- WE OBJECT TO THESE FOREIGN OWNED PRIVATE EQUITY FIRMS EXTRACTING WEALTH OUT OF THE COMMUNITY WHILE LEAVING US WITH DEGRADED LAND, HUGE FINANCIAL LIABILITY, AND POTENTIALLY CATASTROPHIC RISKS TO OUR PUBLIC HEALTH, AND SAFETY





**NOISE**

## Bucolic Baseline Reality

- Worthington’s Soundscape: Existing rural background levels are often 25-30dBA at night
- The 10 dBA Rule: MassDEP 310 CMR 7.10 prohibits noise increase of more than 10 dB over ambient
- The problem with “Average:” A 10 dB increases sounds twice as loud to the human ear.
- Key Point: In a quiet valley, a “legal” increase can still permanently destroy the sense of rural peace.

## CUMULATIVE NOISE SOURCES

BESS Cooling Fans	Inverters/Transformers	Trackers
Fans are louder during peak charging and discharging times, better insulation and design may not help	Inverters and Transformers produce sound	Trackers follow the movement of the sun
Constant calling fans and pumps create sound up to 92 dBA at source	Continuous 120Hz electrical hum	Mechanical whir during daily moves and stowing in high winds

Rural areas with no major roads nearby, sound 45dB – bulldozer @ 92dB - some BESS studies show up to 120dB

# HEALTH IMPACTS OF CONSTANT NOISE

- The Stress Response

- Persistent low frequency noise triggers the body's "fight or flight" system, increasing cortisol (stress hormone) levels

- Mental Health

- In quiet rural settings, noise annoyance is a clinical term for the psychological distress caused by the loss of one's peaceful home environment

- Sleep Disturbance

- Even if one sleeps through a 40 dBA hum, the brain continues to process it. This prevents REM and Deep Sleep cycles, leading to chronic fatigue

- Cardiovascular Impact

- The World Health Organization has linked long term exposure to environmental noise above 40 dB to increased risks of high blood pressure and heart disease

- Vibroacoustic Disease (VAD)

- Though rare, long term exposure to high-intensity low-frequency noise can cause thickening of heart tissues and respiratory issues

## TRACKING SYSTEMS IN WINDY/SNOWY CONDITIONS

- **Moderate Winds** (20-30 mph) create Aeolian tones (whistling) through racking and potential metallic rattling if dampers are not high quality
- **High Wind Stow Mode:** All rows move simultaneously, creating a synchronized mechanical sound event
- **Snow Shedding:** Rapid panel tilting to shed snow causes heavy thumping sounds in a quiet, snow covered landscape

## THE MEGAPHONE EFFECT OF STEEP SLOPES

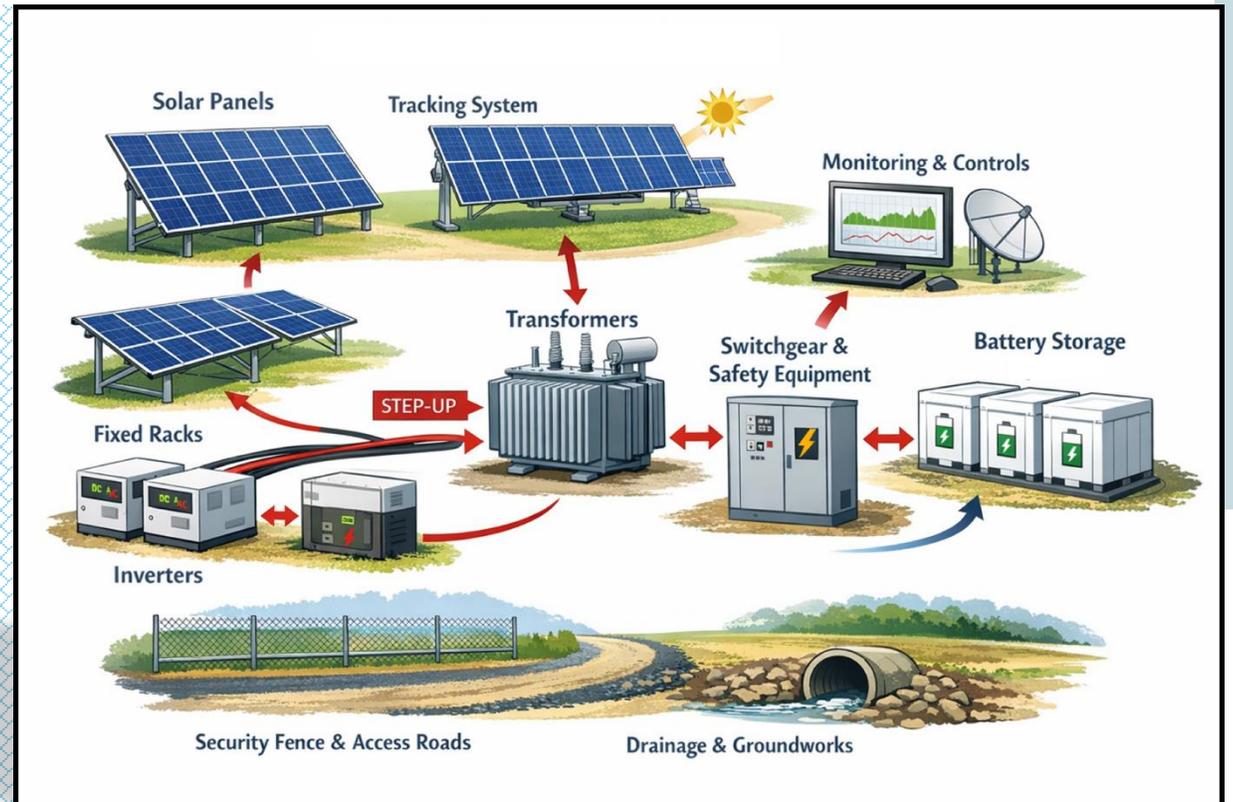
- **Line of Site Projection:** On hills, sound travels directly to neighbors below without being absorbed by ground or crops.
- **Temperature Inversions:** Cool air in Worthington's valleys trap sound, bending it back down towards homes
- **Barrier Failure:** Standard sound walls are often ineffective when the source is at a higher elevation than the listener.

# PROPOSED PROTECTIVE MEASURES

Site Plan Review: Use Worthington's Zoning Bylaw Section 2.6.7 to enforce stricter setbacks

## Required Mitigation:

- Acoustic Blankets/Walls for BESS and inverters
- High Quality Dampers on trackers to stop wind-rattle
- Baseline Monitoring: 7 days minimum study to capture the true quietest hours





## CRITICAL QUESTIONS

- WILL THE DEVELOPER PROVIDE A NOISE MODEL THAT ACCOUNTS FOR DOWNSLOPE PROPAGATION?
- DOES THE BESS UNIT USE LOW-NOISE, VARIABLE-SPEED FANS FOR NIGHTTIME OPERATION?
- HOW WILL THE TOWN ENFORCE THE **PURE TONE** RESTRICTION IF A CONSTANT HUM IS AUDIBLE AT THE PROPERTY LINE?

# THE MASSACHUSETTS ASSOCIATION OF HEALTH BOARDS HAS WEIGHED IN ON NOISOME TRADES

Under Mass. law, a Board  
of Health **must** regulate  
"noisome trades."



**MAHB respectfully submits that a BESS facility would constitute a noisome trade.**

Boards of health are empowered, **in fact are required** to regulate these types of operations pursuant to G.L. c. 111, §§ 143.

It is important to keep in mind.... that **just because a trade or business is authorized by local zoning to a site within a specific district does not mean that the business has a right to create a nuisance.** "If there are reasons apart from the zoning law why the business may not be legally carried on in the district, the zoning law furnishes no protection to it." Marshall v. Holbrook, 276 Mass. 341,34 (1931).

<https://www.mahb.org/wp-content/uploads/2025/10/1-MAHB-Comments-to-DEP-DOER-BFPR-Bess-guidance.pdf?utm>



Mass DEP noise policy dictates that the facility sound levels must not exceed a threshold above ambient conditions. Because the noise limits are relative to the ambient site conditions, **a quiet area will require a lower limit than an already noisy area.**

G.L. c. 111, §§ 143 – 150 gives boards of health the legal authority to regulate noisome trades.....**It is prudent for a developer to understand the legal authority of a board of health to determine if a proposed new operation would result such a noisome trade before clearing acres of land, purchasing hundreds of very costly battery units preparing a site.**

<https://www.mahb.org/wp-content/uploads/2025/10/1-MAHB-Comments-to-DEP-DOER-BFPR-Bess-guidance.pdf?utm>



# INSURANCE



# INSURANCE COVERAGE

MINIMAL DOCUMENTATION SUBMITTED  
BY BLUEWAVE IS  
STARKLY INADEQUATE

Coverage presented for general liability, workers comp, and auto

## BLUEWAVE IS SILENT ON::

- ENVIRONMENTAL/POLLUTION LIABILITY
- BESS STORAGE FIRE/SMOKE PLUME COVERAGE MISSING
- GROUNDWATER, PRIVATE/PUBLIC WATER SUPPLIES AND OFFSITE PROPERTY REMEDIATION
- POLLUTION LEGAL LIABILITY INCLUDING BODILY INJURY, PROPERTY DAMAGE
- THIRD PARTY CONTINGENT BUSINESS INTERRUPTION FOR LOCAL BUSINESSES
- INDEMNITY TOO LOW, LANDLORD PAYS EXCESS
- INSURANCE PREMIUMS MAY INCREASE FOR ABUTTERS AND HOMES AND BUSINESSES IN CLOSE PROXIMITY BECAUSE OF THE RISK OF FIRE

WE ESTIMATE INSURANCE COVERAGE NEEDS

**\$75 TO \$100M MINIMUM**



# **EMERGENCY PREPAREDNESS**

# EMERGENCY PREPAREDNESS

- **Interconnection Reality** – failures across BlueWave's interconnected BESS sites could cascade into false alarms or simultaneous thermal runaway events, triggering evacuations, grid instability, and overwhelming local emergency response.
- **Supervisory Control and Data Acquisition** Most BESS projects use SCADA industrial software systems making this a single point of failure across multiple LLCs. A firmware bug, ransomware payload, supply chain exploit in the SCADA layer could cascade issues (this software controls equipment like inverters, batteries, and sensors using realtime data via networks)

## Shared Grid Nodes

- All hilltown projects tie to Holyoke 69kV feeders, a single fault takes down the system

## Supply Chain/Software Glitches

- Firmware update bugs/recallable components can derail the fleet

## Severe Weather Events

Tornados, Ice Storms, Hurricanes, Heatwaves

## Cloud Hosted SCADA

- Centralized monitoring can allow a hack to propagate to all sites at once

# SCENARIO PRIORITY IN A MULTI ISSUE DISASTER

Scenario Priority	Towns Saved First	Why	Hilltowns Last
High Pop/Quabbin	Amherst, Northampton, Shutesbury, Pelham, Ware	Dense users; direct Quabbin gates/streams. MWRA/DCR trucks pre-staged. State/police escort.	Worthington, Blandford, Becket, Windsor
Grid/Substation	Douglas, Westhampton, Williamsburg	Closer to Eversource 69kV feeders; blackouts hit Worcester first. Nat Guard generators.	Plainfield, Oakham (remote, low voters)
Rural Low-Pop	N/A	Volunteer FDs (Worthington: 7 ppl) wait 2+hrs for Springfield mutual aid; no heli-water due to smoke/PFAS.	All hilltowns (Fire Depts overload instantly)

**-Builds across Western MA hilltowns should be strictly staggered**—not just operational startup, but construction phases too—given BESS fire risks during installation and the total lack of regional emergency capacity.

**-No Construction permits** for additional BESS sites in Hampshire/Hampden until prior phase demonstrates zero fire incidents for 6 months –

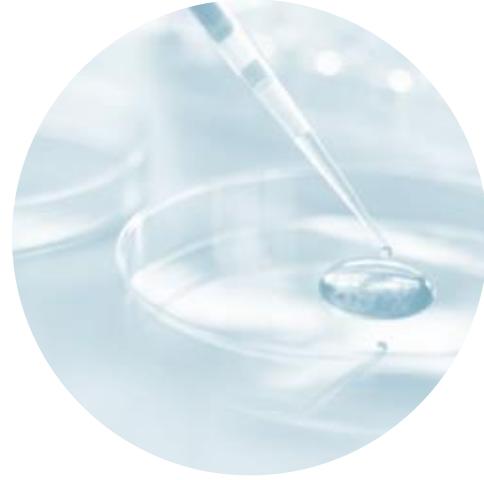
**-No Construction permits** until all current permitted BlueWave projects achieve a 6 months post-substantial completion certification from their respective Conservation Commissions documenting zero wetlands violation



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# WORTHINGTON EMERGENCY MANAGEMENT PLANS

- RH CONWELL SCHOOL
- MAPLES SENIOR HOUSING
- DECISION TREE FOR SHELTER IN PLACE
- LARGE SCALE EMERGENCY EVACUATION PLANS
- FIRST RESPONDER AND EVACUATION ROUTES



**THANK YOU**

