

BLUEWAVE

To: Town of Worthington Planning Board

From: BWC Wades Stream, LLC

Date: June 29, 2026

Subject: Response to Board of Health Questions for the Special Permit Petition and Site Plan Review for BWC Wades Stream, LLC LSGMSPI

Dear Mr. Niswonger and members of the Planning Board:

WSP USA Inc. ("WSP") and BWC Wades Stream, LLC ("BlueWave") received the Worthington Board of Health letter dated 12/31/2025 and response dated 6/17/2026 related to the above referenced project. WSP and BlueWave have prepared the following responses and supporting documentation for consideration by the Board. The original comments and responses are retained. **BlueWave's responses are in green bold.**

(1) Rapid Stormwater Runoff. Aggregated agrivoltaic panels can cause rapid runoff because the panels are impervious surfaces. If the underlying soil is compacted, poorly maintained, and/or already saturated, runoff can be problematic leading to impacts on nearby septic systems and wells as well as pooling (see below (2) Climate Disruption). While the Blue Wave application shows 3 infiltration trenches; their location suggests they are designed to primarily handle runoff from the roadway and cement pads, not from the solar panels themselves. **BOH Concerns/Health Issues: The water table in the area of the agrivoltaic installation is already high as shown below in the data from the septic systems and wells of the abutters. Title V requires a minimum of 48" to groundwater. These systems have required special variances to allow for the high groundwater levels in the area.**

Map/Lot	Address	Owner	Ground water	Well depth
407-26.2	138 Ridge Road	95 Dalton Ave, Nominee Trust	#1:56" #2: 46" (1996)	

BLUEWAVE

407-28	190 Ridge Road	Tim Sena and Catherine Rude-Sena	#1: 34", #2: 36" #3: 44", #4: 40" (2007)	
407-29	140 Buffington Hill Road	Matt and Annie Lagoy	#1: 22"; #2: 23" (2007)	
407-34	141 Buffington Hill Road	Karin Muller	#1: 28" #2: 29" (2003)	
407-35	151 Buffington Hill Road	Former Buffington Hill Partnership		45 ft. (DEP, 2004, now abandoned)
407-134	Worthington Golf Links	David and Helen Pollard	32-36" (estimated) (2017)	175 ft.
407-143	370 Huntington Road	Henry family	4 feet (estimated; based on dry basement)	
407-145	110 Buffington Hill Road	Stephen Szewczyk	#1: 44" #2: 36" (1993)	
407-147	87 Ridge Road	Michael C Kiersten Marich	>72" (estimated) (2017)	

(1) Rapid runoff can cause septic system flooding that could impact effectiveness and cause backups and failures. A flooded septic system can leak untreated wastewater into nearby water bodies, wells, or yards, posing a variety of health threats. Rapid runoff can cause pollution/contamination of nearby private wells and the public water supply. The data suggest that the prevention of negative impacts depends on effective site management that integrates farming and industrial practices. This coordinated approach to managing (the agrivoltaic installation is not identified in the plan. The BOH requests (1) Perc tests with deep holes at several different locations within the site to determine current permeability of soils and depth to groundwater. (2) DEP determination of the safety of the Ridge Road installation for the adjacent public water supply.

BlueWave/WSP Response (5/19/2026):

An initial geotechnical analysis has been completed, and additional pre-construction testing is planned as specified in the Stormwater Management Report and recommended in the Massachusetts Stormwater Handbook. The most up to date version of the Stormwater Management Report, dated 02/18/2026, was shared with the Planning Board and Third-Party Reviewer.

BLUEWAVE

The MassDEP Wetlands Program Policy 17-1 section 4 explicitly excludes solar panels from all impervious surface calculations. The only proposed impervious areas are from the road, the concrete pads, the fence posts and the solar panel racking posts, all of which have been analyzed and accounted for in the Stormwater Management Report dated 02/18/2026 provided to the Planning Board. Aside from these additions, the remaining land will maintain its existing ground cover and permeability. The three proposed trenches are designed to handle runoff from the roadway and cement pads as required by the Massachusetts Stormwater Standards. The overall site design as specified in the Stormwater Management Report results in lower peak flow rates leaving the site compared to the existing conditions. Other concerns regarding groundwater, pollutants, and water quality are also addressed in this report. The Town Water Department issued a letter detailing the location of wellheads, noting that there is no IWPA on site, attached in Appendix A.

BOH RESPONSE (6/12/2026): Please provide data on any perc tests and deep hole investigations that have been conducted to date. How were test locations chosen? Were they witnessed by anyone in addition to the applicant and owners? What were the results? Although this area of the town has a well-known high water table; it is possible long-standing drought conditions in Western Mass. mean that deep soil investigations and perc tests might not accurately reflect future weather or subsurface conditions.

And concurrent with drought, climate change has resulted in occasional very heavy downpours with the release of massive amounts of water over short periods of time. Compaction during construction and, possibly, during maintenance (see below), can increase risks of flooding that the proposed preventive measures do not address:

<https://www.umass.edu/news/article/longer-droughts-bigger-floods-umass-amherst-hydrologist-maps-future-water-new-england>

Blue Wave references generalized state regulations that are being applied despite widespread ignorance about the long-term performance and costs to people and the environment of large industrial agrivoltaic facilities and they do not seem to be taking into account the unique characteristics of the Ridge Road microclimate/ecosystem or complex subsurface conditions at this site.

BW Response: Per PARE Corp's comments on 6/16/26, the Board has the option of placing a condition on a potential Site Plan Approval requiring the Applicant submit the results of the geotechnical investigation to assist in determining the appropriateness of the racking system.

Post construction is standard practice for BlueWave agrivoltaic sites to be evaluated for decompaction. If measures are needed to remediate soil conditions, including decompaction, BlueWave and its contractors will complete the necessary steps to decompact.

BLUEWAVE

(2) Climate Disruption: Worthington lies on the east slope of the Berkshires. According to a Mass.gov site (www.mass.gov/info-details/top-impacts-in-the-berkshires-and-hilltowns-region#most-urgent-impacts---human-sector 2022)), ongoing hazards include temperature extremes and changes in precipitation patterns with accompanying changes in patterns of both soil conditions and surface and ground water flows. In addition, acid rain continues to be a problem in this area ([https://www.umass.edu/water-resources-research/sites/default/files/2025-11/Report%202025 Final.pdf?1764462992](https://www.umass.edu/water-resources-research/sites/default/files/2025-11/Report%202025%20Final.pdf?1764462992)), **BOH Questions/Health Concerns.**

(1) Acid rain can accelerate the leaching of zinc and iron from the galvanized iron supports (galvanic corrosion). Farm equipment and maintenance practices can further cause scratching or wear that, in turn, can allow rusting of the steel and lead to iron leaching into soil and water. Because of the large number of panels and the many thousands of support poles, local wells that are fed by groundwater and runoff as well as wells in the recharge area, may have higher levels of both. Symptoms of zinc toxicity include diverse abdominal effects (vomiting, diarrhea), inflections and flu-like symptoms. Symptoms of iron toxicity include abdominal effects and liver damage. The areas under solar panels are cool, moist and shady with the likelihood of tall grass and/or dense vegetation, the preferred environment for the ticks that carry Lyme and related diseases. The fencing may prevent predators from entering the area and permit an explosion in the populations of vectors such as tick-carrying mice. Standing water as a result of poor maintenance can lead to a higher incidence of mosquitoes leading to exposure to viral diseases such as West Nile Virus and Eastern Equine Encephalitis The BOH would like to see a plan that indicates how the operator would monitor and address issues associated with tick infestations, mosquito-attracting standing water and galvanic corrosion (see also Rapid Stormwater Runoff above)

BlueWave/WSP Response (5/19/2026): The racking utilized for the project are standard galvanized steel components commonly used throughout the construction, utility, transportation, and agricultural industries, including in outdoor applications with long-term environmental exposure. The galvanization process is specifically intended to prevent corrosion and extend the useful life of the steel.

Regarding standing water, the project has been designed in accordance with applicable stormwater management standards to avoid the creation of persistent standing water conditions. The site will maintain vegetated ground cover and stormwater controls intended to promote infiltration and controlled drainage.

As an agrivoltaic facility, the property will remain in active agricultural use and vegetation will be routinely managed through mowing or grazing. These ongoing activities inherently limit the establishment of dense unmanaged brush conditions associated with elevated tick habitat.

BLUEWAVE

The proposed fencing is standard agricultural fixed knot fencing and does not create a sealed environment that excludes all wildlife. Similar fencing is commonly used throughout agricultural operations without resulting in documented public health concerns related to tick populations.

BOH RESPONSE (6/12/2026): The agricultural use is stated to be haying, with an anticipated two harvests per year. Hay-producing fields are typically left to grow undisturbed between harvests leaving time for unmanaged brush conditions to develop likely in scattered areas throughout the property.

In addition, acid rain continues to be a problem in Western Massachusetts (<https://www.umass.edu/water-resources-research/book/export/html/594>) and the soils on this property measure acidic in U Mass Extension soil tests). The recent reduction in federal enforcement of air quality standards, is expected to increase acid rain levels in the near future (<https://www.nrdc.org/press-releases/coal-pollution-spiked-after-trump-administrations-free-pass-pollute>).

Proper management and maintenance can help address these concerns; however, this may require regular maintenance of the areas in which the galvanized posts sit (e.g., removal of grass around the posts) and care must be taken to make sure they have not been damaged by weed whackers, maintenance equipment or animals.

<https://www.energy.gov/cmei/femp/managing-and-mitigating-solar-pv-corrosion>).

As noted, the soil is currently acidic. Agricultural Solar Tariff Generation Units Guideline required maintenance of a 6.0 pH level or higher. This may require large applications of agricultural lime to address the problem. Although agricultural lime is considered non-toxic and non-corrosive, there is no requirement in the Blue Wave guidelines that only agricultural lime be used on the site, or that inspections take place to determine whether corrosion has occurred. While annual inspections of the piping is part of the Operations Plan, there is no directive to the agricultural operators requiring vigilance in the monitoring of soil pH levels and reporting of any damaged posts.

An additional concern has recently been brought to our attention: “The UMass Extension soil recommendations submitted by the applicant as Attachment D-2 call for the application of 175 pounds of nitrogen per acre annually across the 25-acre project area — a total annual nitrogen loading of approximately 4,375 pounds. . .” The proposed agricultural operation's nitrogen loading rates, on soils with the high water table underlying this property, raises the concern that residents using downgradient private wells will be exposed to excessive nitrogen compounds, primarily nitrate and nitrites -- in their water supply. This exposure can cause methemoglobinemia (“blue baby syndrome”) in infants, while long-term exposure (the lifespan of the project) is also linked to certain cancers, thyroid diseases, and birth complications.

BW Response: It is common during the construction process for lime to be applied to encourage grass growth, and following construction, lime applications are applied at the farmer's typical schedule. Currently, the farmer applies lime to the fields periodically, but not every year.

The Ridge Rd farm currently applies a fertilizer containing nitrogen every year, with the exact formulation varying based on nutritional needs and availability. It is anticipated that similar fertilization will continue after

BLUEWAVE

the system is operational, as appropriate to maintain the necessary farming conditions.

(3) Solar Panel Cleaning. BOH Questions/Health Issues: The proposed agrivoltaic installation is surrounded by woodland and open fields, with a high likelihood of significant bird droppings and accumulating debris from trees. It seems likely that cleaning will need to occur more often than annually. Is this the case? Who would operate the needed "special" cleaning equipment? Does this equipment add to the possibility of damage to the underlying support structure including scratching and removal of the galvanized material

protecting the poles from rust. Are any chemicals used in the cleaning process and does the water used deplete local water supplies? The BOH requests answers to these questions.

BlueWave/WSP: The panels do not require cleaning. Dust, dirt, or animal droppings are typically washed away by rain.

BOH RESPONSE (6/12/2026): A no-machine-or-chemical-cleaning directive should be added to any conditions. However, even without cleaning or use of cleaning products or machines; there likely will be occasional maintenance work involving heavy machinery, e.g., to repair a single panel broken by a tree limb thrown during a storm; fix damaged wiring, etc. Cautions regarding the use of heavy equipment during maintenance and evaluation for soil compaction need to be included in any agreement.

BW Response: Acknowledged.

(3) Noise and Health Complaints: While agrivoltaic installations are generally considered quiet compared to other power generating systems, there have been noise complaints, especially in residential and rural communities. Noise sources include: (a) the tracking system motors that tilt panels throughout the day (a mechanical sound that can be heard at distances of up to 1,000 meters depending on the number of panels and atmospheric conditions); (b) inverters/transformers (a constant low-frequency "hum" typically around 120 Hz that some have described as "irritating" or like "living in a machine shop"). The hum can vary depending on the electric load. (c) cooling fans for heat management (broadband noise) and (d) construction noise including noise from heavy machinery and pile drivers BOH Concerns/Health Issues: The 190 Ridge Road location is both residential and rural. While state regulations ([310 CMR 7.10](#)) set noise limits (e.g. no more than 10 dB(A) above ambient or pure tones); response to

BLUEWAVE

noise can be highly subjective and can affect both humans and animals. The Worthington Board of Health is responsible for handling any facility-related noise or other health complaints. Decibel levels are not the only concern: we have received noise complaints related to electric dog fences and other presumably “quiet” sources. If we do get noise complaints, who is responsible at BlueWave for handling this type of concern and what is their track record for responsiveness? What if there are other physiological complaints (e.g. nausea, headaches etc.) Might the agricultural requirements coincident with the solar panels and their infrastructure, require noisier than typical farming equipment? (3) Might there be construction noise as part of maintenance or repair/replacement of panels and electric The BOH requests copies of any noise study conducted during operations and over time from a similar agrivoltaic system. Also, information about any noise complaints BlueWave may have received associated with their agrivoltaics installations. The BOH would also like the health officer from BlueWave identified, with information about background, experience, and availability.

BlueWave/WSP Response (5/19/2026): Any issues during the operation of the project may be directed to the BlueWave Asset Management team. The contact information for the team will be posted on the site and is accessible in the Emergency Response Plan.

BOH RESPONSE (6/12/2026): The phone numbers provided for emergency concerns provided by the applicant appear to allow only general questions to be asked directly of management or of an operations manager located off site. There is no indication that Blue Wave has a health officer available to respond to questions about health and safety in a timely manner. Furthermore, the Emergency Response Plan limits maintenance frequency as well as town access to the operators. “Reasonable times” is not defined, nor is it indicated whether the “Operator” or an owner representative would need to be present. As stated by BlueWave, “If a resident complaint involves site compliance (e.g., changes to dual-use farming, fencing, or noise studies), BlueWave addresses these during public hearings and ongoing permitting reviews with municipal authorities, such as local Planning Boards and Boards of Health.” Two business days may not be acceptable if there is an injury or an emergent health complaint. “Permitting reviews” typically occur annually or semi-annually, if at all. Public hearings similarly take time to prepare for, publicize, and conduct. While impacted individuals are likely to seek emergency care at a hospital or Health Center; possible on-going risks to them and to others need to be addressed promptly and Blue Wave needs to acknowledge there may be remediation needs that do not fall into the categories they have currently identified.

As stated below, “BlueWave will remain the long-term asset manager of the project throughout its lifetime and will be responsible for ongoing operations and

BLUEWAVE

maintenance of both the solar production and agricultural agreements". Is it correct that Blue Wave is the Operator? According to the Emergency Response Plan the Operator has a highly detailed list of responsibilities, many of which require prior authorization. Since Blue Wave is the long-term asset manager, who is entity responsible for that authorization? Delayed repairs and confusion about the specific person who could provide needed authorization could have unintended health and safety impacts.

BW Response: As previously discussed, the Emergency Response Plan submitted is a draft and illustrative in nature. Contact phone numbers and all project specific details on the ERP are typically finalized during the building permit application phase. We have no objection to a condition on the site plan approval requiring that the ERP be completed prior to building permit issuance.

BlueWave will remain the Project Owner and is responsible for providing authorization on items specified in the Operations & Maintenance Plan. "Operator" responsibilities, listed in the O&M plan as conducting maintenance site visits, are often subcontracted out.

BlueWave/WSP Response (5/19/2026): A site-specific noise study was conducted for this project, attached in Appendix B of this response.

BOH RESPONSE (6/12/2026): The sound study referenced in Appendix B and the accompanying diagram relies on the A-weighted decibel scale (dBA). The thermometer analogy, though widely used for OSHA compliance is misleading presenting a logarithmic

progression as an arithmetic one [Ridge Road is not an OSHA environment; in addition to the agricultural designation for this parcel of land; the area is primarily a residential and recreational one]. By presenting noise purely as an arithmetic "temperature," the chart implies sounds below 70 dBA are harmless. It ignores the fact that the noise from a large-scale agrivoltaic system may continue for 24 hours a day, or, at least, a large portion of that time. A 50 dBA "Average office background" is fine at work, but the exact same 50 dBA level of road traffic noise outside the bedroom window at night can cause illness-producing sleep disruption, stress, and elevated blood pressure over time. The motorized tracking systems used to follow the sun produce a quiet mechanical whirl or hum when adjusting position and the centralized inverters/transformers that convert DC power to AC power utilize high-frequency switching equipment and intensive cooling fans. Neighbors of commercial arrays have complained of a persistent, low-frequency buzzing or whirring that carries across property lines during peak daylight production hours. While trackers do not operate at night, the inverter and cooling equipment may well be active during the night and may be making sounds that are audible to sensitive individuals.

BW Response: Acknowledged and defer to PARE Corp response to our comment dated 6/10 which we are in agreement with:

"The Applicant has indicated that they are agreeable with a conditional Site Plan Approval requiring that the project comply with the MADEP noise policy and the Town of Worthington Zoning By-law, with recommended noise barriers next to the

BLUEWAVE

proposed equipment pad inverters. The Applicant should take into consideration the anticipated sound from the chosen equipment and design the sound barriers around that information. The Applicant must complete a sound study during the operations phase within six months of commencing operations and install sound barriers as required to maintain compliance with the Mass DEP noise policy and the Town of Worthington ZBL following their review of the report."

(5) Security, becoming an "attractive nuisance": In Massachusetts, an attractive nuisance is a dangerous, human-made condition on private property that entices children to trespass, making the landowner liable for injuries even if the child is trespassing, provided the owner knew or should have known about the risk and failed to take reasonable care to protect kids, who often don't recognize the danger. Key examples include unfenced pools, machinery, or construction sites. **BOH Concerns/Health issues: The facility is located within easy walking distance of the Russel H. Conwell elementary school. There is no equivalent, heavily fenced industrial site in Worthington. Injuries can come from trying to breach the security fence; vandalism of the solar panels and the other electrical equipment leading to cuts or burns. The BOH requests that BlueWave delineate their approaches to preventing vandalism and access to the site by curious children.**

BlueWave/WSP Response (5/19/2026): The solar facility will be enclosed by a code-compliant security fence with locked access gates and warning signage. Electrical equipment associated with the project is designed and installed in accordance with the National Electrical Code (NEC), utility interconnection requirements, and applicable state and local safety standards.

BOH RESPONSE (6/12/2026): While adherence to codes are expected; nothing like this has ever existed in Worthington. What contingencies are in place should these code-compliant safeguards fail?

BW Response: Distributed Generation-scale solar facilities are common throughout Massachusetts and have an established record of safe operation. The fence will be 8' in height and electrical equipment is locked. The panels, along with much of the electrical wiring, will be 10' in height. Project equipment de-energizes in the event of faults, abnormal operating conditions, or damage. Massachusetts has one of the most mature solar markets in the United States, supported by strong state policies. Across the Commonwealth there are over 500 operating solar projects over 1 MW and over 120 storage projects over 1 MW (data compiled by SEIA "Solar Energy Industries Association").

(6) Buried Electrical Lines: Most agrivoltaic installations require electricity

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transmission between panels and other system components using buried electrical lines contained in PVC or other sheathing. BOH Concerns/Health: There is no indication of how many lines there would be, how deeply they would be laid, and how they would be protected from damage from weather conditions (freezing and thawing) or mechanical factors (agricultural activities, cleaning and maintenance activities). They can cause system failures (see below), and/or pollute the agricultural land preventing later use if they are not properly disposed of or maintained. This can affect food supplies should there be an effort to return the land to food production. The BOH requests details about these buried lines and how they will be monitored and maintained.

BlueWave/WSP Response (5/19/2026): Buried conduit is a standard component of electrical infrastructure and will be installed in accordance with the National Electrical Code. Final trenching details will be developed prior to construction.

BOH RESPONSE (6/12/2026): Again, as above, installation according to code is the minimum that is expected and facilities such as these have not previously existed in Worthington. What are the plans for any needed repairs, and for final disposal designed to return the land to farmland? Concerns have been raised that certain crops can no longer be grown (e.g., potatoes) on land previously used for industrial solar installations.

BW Response: Decommissioning is a requirement of the Town Zoning Bylaw (Section 8.5.6, 3a, 3b) and has been addressed in the projects Special Permit and Site Plan Review permit application submission.

(7) Transformers and Inverters: BOH Concerns/Health issues: Transformers contain oils and other toxic chemicals. Oil spills/releases (even of presumably “non-toxic” oils) can pollute water supplies and require costly and difficult cleanup. Oils can also cause fires. Inverters can fail as a result of overheating, power surges and outages that cause grid instability, arcing, etc. They can have circuit boards that use heavy metals, and can generate significant heat leading to fires, toxic smoke, soil and water contamination, and hazardous waste. Specific risks depend on the specific transformer or inverter used and have been well- detailed elsewhere. The BOH requests that Blue Wave identify the specific transformers and inverters likely to be used, including information about their potential toxicity as well as details about maintenance procedures and pollution monitoring and mitigation approaches.

BlueWave/WSP Response (5/19/2026): For illustrative purposes, an inverter specification sheet was shared in Attachment B on 10/21/2025. An illustrative transformer specification sheet is attached in Appendix C. This transformer utilizes a non-toxic bio-based fluid. Final equipment selection depends on market conditions and supply constraints at procurement, and is typically finalized during the building permit phase. All aspects of the project are remotely monitored 24/7. A draft Operations and

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Maintenance Plan is shared in Appendix D.

BOH RESPONSE (6/12/2026): Can a transformer/inverter that uses non-toxic materials be required? How does remote monitoring work? We assume the Fire Department would be hooked up to any monitoring system, but would the BOH and the Emergency Manager also be notified? How quickly would such notification occur and who is responsible? How quickly is any response likely to be mounted; by whom? and how supervised? Would “authorization” from management in Boston be required before a response could be mounted? If dependent on first responders, are they receiving training related to the range of possible concerns, including possible air pollution impacts or noise concerns?

BW Response: All DC coupled solar + storage sites have an automated call dialer from the BESS in the FA panel. If activated by an alert, the call dialer receives a signal, and a call queue is administered, with calls to the Operator and Fire Department. The FA panel alert call to the Fire Department is made within 3 minutes per NFPA requirements but is generally faster.

As noted during the public hearing on June 18th, it is recommended that all site personnel and emergency response personnel, who could be responsible for responding to a BESS emergency, be trained prior to a BESS being energized. Refresher training should be provided as appropriate, typically annually, as required by NFPA 855.

(8) BESS (battery storage). The BOH shares in the many concerns related to function and maintenance of the battery electrical storage units (fires, toxic releases to both air and water, injuries that have been clearly laid out by Beth S. Greenblatt (Beacon Integrated Systems) in her Nov. 18, 2025, review of the BlueWave application as well as by many others both in Worthington and elsewhere. The BOH requests answers to the questions raised by Beth S. Greenblatt in her review and well as by many other concerned local citizens.

BlueWave/WSP Response (5/19/2026): Responses to Beacon Integrated Systems comments were shared on 1/2/2026 and 2/5/2026.

BOH RESPONSE (6/12/2026): The applicant states that no water is used in the event of a BESS fire; i.e., the fire is allowed to burn out. The argument is that this mitigates any concerns about water pollution. Apparently BESS fires can burn for a very long time and possible air pollution concerns have not been addressed. Air pollution during a rain event can compound the pathways for toxic exposure. In a recent study in Sweden, the researchers intentionally caused lithium-ion battery thermal runaway events and analyzed the soot. The researchers found PFAS compounds in every soot sample. <https://link.springer.com/article/10.1007/s10694-025-01708-y>

BW Response: In the 1/2/26 submittal, we provided a number of third-party scientific

studies, which address air pollution. The study linked in BOH Response is noted as “*Experimental*” creating and then investigating a thermal runaway event with “*eight prismatic lithium nickel manganese cobalt oxide (NMC) battery cells...*”. The proposed project in Worthington, as previously documented, is to use a Lithium Iron Phosphate (LFP) battery, not a NMC battery. UL 9540A testing regarding thermal runaway has been conducted on the BESS provided in the draft HMA, stating “*The unit level test demonstrated that the near simultaneous failure of five cells within the same battery unit did not lead to flaming combustion nor to a propagating thermal runaway event throughout the SB3 cabinet.*”

(1) Waste Disposal. The agrivoltaics facility has an estimated lifespan of 20-25 years. The applicant; however, indicates that the rapidity of technological change prevents the identification of specific core components (e.g. the Inverter and BESS units) because construction is not likely to occur for several years and designs change. **BOH Questions/Health Issues:** The likelihood of repairs and updates suggest that waste disposal could become an issue well in advance of the 15–20-year time frame indicated by the applicant. If discarded infrastructure is stored on site or simply abandoned, this could cause both physical endangerment and environmental pollution, including affecting future agricultural viability of the site. Among the questions: (1) How often are individual solar panels likely to need replacement because of either damage or changes in technology? (2) How would discarded equipment be stored and/or disposed of? (3) During maintenance, would any infrastructure (e.g., conduits and buried transmission wires) be left to pollute

the area? The BOH requests a disposal plan that takes into account both final disposal as well as any interim disposal needs with delineations of approaches to address soil and water-polluting toxicants that may result from waste storage and/or disposal

BlueWave/WSP Response (5/19/2026): Replacement of the full system is unlikely. In the event that an individual module is broken, they are replaced by BlueWave’s Asset Management team and recycled. To decommission the site at the end of its life, per the Lease and Easement Agreement, shared as Attachment A of the 12/21/2025 submittal, all above-ground and below-ground (up to a depth of three feet below grade) equipment shall be removed. Materials on site including fencing, racking, modules, and conduits can be recycled. Glass composes most of the weight of a solar panel (about 75 percent), and glass recycling is already a well-established industry. Other materials that are easily recyclable include the aluminum frames, copper wiring, and plastic junction boxes. Modules also have the ability to be reused as well, albeit at reduced

operating efficiency, but at a lower price point attractive to certain buyers.

BOH RESPONSE (6/12/2026): Blue Wave references only end-of-life waste disposal and did not answer the questions related to replacement of individual panels or disposal of interim waste. The BOH would like to see plans for any interim waste storage and disposal of nonrecyclable materials both on and off site.

BW Response: Individual panels would be handled in typical O&M. The O&M draft is illustrative and not all encompassing. Interim waste is managed similar to the Decommissioning Plan, shared in Appendix G of the 1/2/2026 Response to Questions, *“All other recyclables will be transported to the nearest Transfer Station that accepts the material”*.

(10) Overall Maintenance: BOH Questions/Health Concerns: (1) Would BlueWave remain the operator? (2) Who is responsible for assuring that the agricultural activities required as part of the project are properly conducted; i.e., they (a) do not damage the panels or their supports, (b) do not allow the soils under the panels to compact and flood or accrue standing water and (c) do not allow the use of toxic pesticides/herbicides etc. to be used on the property. The BOH requests a detailed maintenance plan that takes into account the concerns outlined in items (1) – (9) above.

BlueWave/WSP Response (5/19/2026): BlueWave will remain the long-term asset manager of the project throughout its lifetime and will be responsible for ongoing operations and maintenance of both the solar production and agricultural agreements. A draft Operations and Maintenance Plan is shared in Appendix D.

BOH RESPONSE (6/12/2026): The Operations and Maintenance Plan have a great many, mostly vague details, as well as limiting inspections and requiring frequent Operator authorization for any oversight. Several concerns about operations and maintenance have been noted in the comments above. In addition, are the management of the solar-voltaic aspects of the facility and the agricultural ones coordinated? Who is responsible for making sure the agricultural requirements are met, that the agricultural operations do not create adverse health conditions, or conditions that might damage the agrivoltaic infrastructure,

e.g. excessive use of lime or fertilizers that can damage nearby properties or pollute downstream water supplies? Compacting of soils related to agricultural operations leading to down ? What if there is a conflict between these two aspects of the project?

BW Response: The project owner is responsible to ensure farming operations continue and will have service agreements in place with the farmer(s). The SMART

ASTGU (Agricultural Solar Tariff Generation Unit) Program regulation requires annual reporting on the agricultural production of an agrivoltaic project to MA Department of Energy Resources (DOER) and the MA Department of Agricultural Resources (MDAR) to determine that the farm is in conformance with all ASTGU provisions in general under the SMART Program.

What happens if there is a transfer of ownership? Blue Wave states:

Should the property or any portion of the property be transferred to another owner, the relevant Authorized Administrative Agency will be notified. The new owner will be notified of the presence of this Operation and Maintenance Plan and be held responsible for the implementation of this plan and financing as it pertains to their property

Who would retain authority for oversight and maintenance?

BW Response: The Owner of the project.