

WORTHINGTON BOH COMMENTS/QUESTIONS ON 190 RIDGE RD STORMWATE REPORT
DATED 7.7.2026

Page 11: **No wastewater nor hazardous materials shall be discharged on-site.**

Does this apply to both the agricultural and the DC-generating activities? What happens if there is a gasoline spill? Who makes sure this is true?

Page 11: **Stormwater management practices have been designed to maintain the required separation from groundwater in accordance with applicable standards.**

Please specify who established these standards. Please explain who ensures they are met and how.

Page 12: **According to the National Oceanic and Atmospheric Administration (NOAA) Atlas 14, Volume 10, Version 3, the storm events generate 3.29, 5.14, and 8.09 inches of precipitation respectively (Appendix D – Rainfall Data).**

This data is from 2015, updated in 2019. Extreme rainfall/snow events have continued to increase since that time and are expected to continue to increase. Please update with latest data.

Page 15: **Good housekeeping – The site shall be kept clean at all times. Refuse collection and disposal shall occur on a regular basis.**

How often? Where is this specified?

All materials shall be disposed of in approved, designated locations in accordance with the relevant regulations.

Where are these listed? This is unacceptably vague.

Page 15-16: **Herbicide and pesticide use shall not take place during construction. If used post-construction, application shall be performed in accordance with product labels and applicable guidelines. Any fertilizer, herbicide, or pesticide application shall be coordinated with the farmer's hay production practices to avoid impacts on crop quality and yield.**

Page 18: **Pesticides, fungicides and herbicides shall only be applied by the landowner/farmer in accordance with product labels and applicable guidelines.**

I thought no herbicides or pesticides were to be used on the property at any time, and that would include post-construction. Please clarify.

Page 16: Pet waste management provisions – Pets shall not be present on-site during construction or operation.

Does this mean the owners of the home near the property cannot have pets? Are pets on abutter properties to be kept off the solar array? How will this be supervised?

Page 16: It is unknown if the current residential building on the Property has a correlated septic system. If one exists, it is the owner's responsibility to properly manage and maintain the septic system.

The home of the property own has a septic system on file with the Board of Health. Who is responsible for potential damage to abutter septic systems?

Page 16: De-icing chemicals will be used strategically to minimize environmental impacts. Mechanical snow removal shall be prioritized over chemical treatment when possible.

Again, the BOH would prefer no de-icing materials be used on this site.

Page 17: It is recommended that any and all manure and fertilizer application be performed in accordance with applicable guidelines and in a conservative manner.

Would prefer this be more than a recommendation. Any applications should be applied in accordance with legal requirements and conservatively.

Page 18: The property owner noted above is the stormwater management system owner. Upon transfer of property, and therefore stormwater system ownership, the seller shall notify the buyer of the presence and location of all stormwater BMPs and the ongoing responsibility to maintain them in accordance with this plan. O&M requirements and contract details shall be included in property transaction documents when possible.

What happens if the ownership of BlueWave changes? How does the requirements of this agreement get transferred so that there is no reduction in operation/maintenance standards.

Page 18: The maintenance tasks are grouped by system component and summarized in the tables below. These actions, routine and corrective, shall be performed in a timely manner by the responsible party throughout the life of the system.

Who would this be? Would it be a dedicated "responsible party" located in Boston? Would this person be likely to be different each time inspection occurs depending on staffing changes at BlueWave. What is being done to assure continuity of care?

Page 20: 3.2.3 Vegetated Filter Strips

Who is in charge of determining the need for maintenance -- "as necessary" and "at least" are too vague.

Page 21: These systems require regular inspection and maintenance to ensure proper function and prevent clogging of the media layer

How regular? Organic media filters — such as peat/sand or compost-based systems — while effective for stormwater treatment, have design and operational vulnerabilities that can limit performance and increase maintenance needs. 1. Organic media are more prone to clogging than sand, especially if upstream sediment loads are high or if exposed soil surfaces exist. This requires frequent inspection, cleaning, and possible media replacement, increasing labor and capital costs. 2. In cold climates, organic media can become completely impervious when frozen, halting operation during winter. 3. Decomposing organic material can produce odor issues, especially in residential or sensitive areas. If not properly contained, organic media can leach nutrients or other contaminants into groundwater if the filter bed is not separated from subsoils by an impermeable layer. Fecal coliform removal is moderate (around 50%).

Page 21: The gate at the main entrance will include signage with operator identification and emergency contact information. A secure lockbox containing access key(s) shall be installed in case of emergency to provide full access to the Project for the local fire department. In accordance with the Worthington Protective Zoning Bylaws (the Bylaws) Section 8.5.6(A), “All means of shutting down the solar photovoltaic installation shall be clearly marked and approved by the Town fire chief.” In addition to gate...

Who will make sure these signs are actually read by someone -- who will be responsible for initiating an emergency response.

Page 25: Vegetated filter strips provide initial removal of coarse sediment and debris as they distribute and slow flow, and organic media filtration systems provide primary water quality treatment through filtration and adsorption processes.

See note above on the high maintenance requirements of such systems

Page 27: A small sliver at the northern edge of the Property is within an Interim Wellhead Protection Zone.

Despite this categorization, the fact is that the northern edge of the Property is within an Interim Wellhead Protection Zone. While flow can be modeled, it can be notoriously unpredictable, e.g. in frozen ground, or if, during construction, undetected bedrock disturbances cause water to flow in unexpected directions.

Page 28: An Illicit Discharge Compliance Statement shall be submitted prior to the discharge of any stormwater to post-construction BMPs.

How much prior and to whom? Could such a discharge be stopped if deemed noncompliant by a party not associated with BlueWave?