

Commonwealth of Massachusetts
 Executive Office of Energy and Environmental Affairs ■ MEPA Office

For Office Use Only
 Executive Office of Environmental Affairs
 MEPA Analyst: *Anne Canaday*
 Phone: 617-626-*1035*

Notice of Project Change

The information requested on this form must be completed to begin MEPA Review of a NPC in accordance with the provisions of the Massachusetts Environmental Policy Act and its implementing regulations (see 301 CMR 11.10(1)).

EEA #15363		
Project Name: West Medway II		
Street Address: 9 Summer St		
Municipality: Medway	Watershed: Charles	
Universal Transverse Mercator Coordinates: 19 T 297890 E 4667945 N	Latitude: 42.1375	Longitude: -71.4456
Estimated commencement date: Aug 2017	Estimated completion date: June 2018	
Project Type: Electric Generation	Status of project design:	100 %complete
Proponent: Exelon West Medway LLC and Exelon west Medway II, LLC		
Street Address: 300 Exelon Way		
Municipality: Kennett Square	State: PA	Zip Code: 19348
Name of Contact Person: Corinne Snowdon		
Firm/Agency: Epsilon Associates, Inc	Street Address: 3 Mill & Main Place, Suite 250	
Municipality: Maynard	State: MA	Zip Code: 01754
Phone: 978-897-7100	Fax: 978-897-0099	E-mail: csnowdon@epsilonassociates.com

With this Notice of Project Change, are you requesting:

a Single EIR? (see 301 CMR 11.06(8)) Yes No

a Special Review Procedure? (see 301 CMR 11.09) Yes No

a Waiver of mandatory EIR? (see 301 CMR 11.11) Yes No

a Phase I Waiver? (see 301 CMR 11.11) Yes No

Which MEPA review threshold(s) does the project meet or exceed (see 301 CMR 11.03)? As listed in the ENF (expansion of an existing electric generating facility by 100 MW or more; modification of source, 75,000 tpy GHG or more; conversion of agricultural land to non-agricultural use. Impervious area reduced to less than 5 acres during review process, this threshold no longer applies.

Which State Agency Permits will the project require? EFSB Approval of Petition to Construct, DPU Zoning Exemption, DEP Major Comprehensive Air Permit and federal PSD Permit have been issued. EFSB Approval of Certificate and EFSB Approval of Notice of Project Change, Water Supply issued August 14, 2017. DEP Title V Operating Permit and DPS-State Fire Marshall Aboveground Storage Tank Construction and Use Permits required at later date.

Identify any financial assistance or land transfer from an Agency of the Commonwealth, including the Agency name and the amount of funding or land area in acres: NONE

1033
June 1904

PROJECT INFORMATION

In 25 words or less, what is the project change? The project change involves a reduction in water use from 97,000 gpd to 68,800 gpd. Documented yield of on-site bedrock well increased from 51,840 gpd to 82,000 gpd. As a result, supplemental water from the Town of Millis municipal system is no longer required.
See full project change description beginning on page 3.

Date of publication of availability of the ENF in the Environmental Monitor: (Date: May 6, 2015)

Was an EIR required? Yes No; if yes,
was a Draft EIR filed? Yes (Date: Sept 30, 2105) No
was a Final EIR filed? Yes (Date: Feb 1, 2106) No
was a Single EIR filed? Yes (Date:) No

Have other NPCs been filed? Yes (Date(s):) No

If this is a NPC solely for lapse of time (see 301 CMR 11.10(2)) proceed directly to **ATTACHMENTS & SIGNATURES**.

PERMITS / FINANCIAL ASSISTANCE / LAND TRANSFER

List or describe all new or modified state permits, financial assistance, or land transfers not previously reviewed: **dd w/ list of State Agency Actions (e.g., Agency Project, Financial Assistance, Land Transfer, List of Permits)....no new permits required; EFSB has already approved parallel Notice of Project Change (August 4, 2017)**

Are you requesting a finding that this project change is insignificant? A change in a Project is ordinarily insignificant if it results solely in an increase in square footage, linear footage, height, depth or other relevant measures of the physical dimensions of the Project of less than 10% over estimates previously reviewed, provided the increase does not meet or exceed any review thresholds. A change in a Project is also ordinarily insignificant if it results solely in an increase in impacts of less than 25% of the level specified in any review threshold, provided that cumulative impacts of the Project do not meet or exceed any review thresholds that were not previously met or exceeded. (see 301 CMR 11.10(6)) Yes No; if yes, provide an explanation of this request in the Project Change Description below.

FOR PROJECTS SUBJECT TO AN EIR

If the project requires the submission of an EIR, are you requesting that a Scope in a previously issued Certificate be rescinded?
 Yes No; if yes, provide an explanation of this request_____.

If the project requires the submission of an EIR, are you requesting a change to a Scope in a previously issued Certificate?
 Yes No; if yes provide an explanation of this request_____.

SUMMARY OF PROJECT CHANGE PARAMETERS AND IMPACTS

Summary of Project Size & Environmental Impacts	Previously reviewed	Net Change	Currently Proposed
LAND			
Total site acreage			
Acres of land altered			
Acres of impervious area			
Square feet of bordering vegetated wetlands alteration			
Square feet of other wetland alteration			
Acres of non-water dependent use of tidelands or waterways			
STRUCTURES			
Gross square footage			
Number of housing units			
Maximum height (in feet)			
TRANSPORTATION			
Vehicle trips per day			
Parking spaces			
WATER/WASTEWATER			
Gallons/day (GPD) of water use NOTE: all water to be supplied from on-site deep bedrock well	97,000 gpd, annual average	A reduction of 28,200 gpd for first year of operation	68,800 gpd, declining to 52,000 gpd by 2025
GPD water withdrawal			
GPD wastewater generation/ treatment			
Length of water/sewer mains (in miles)			

Does the project change involve any new or modified:

1. conversion of public parkland or other Article 97 public natural resources to any purpose not in accordance with Article 97? Yes No

2. release of any conservation restriction, preservation restriction, agricultural preservation restriction, or watershed preservation restriction? Yes No

3. impacts on Rare Species? Yes No

4. demolition of all or part of any structure, site or district listed in the State Register of Historic Place or the inventory of Historic and Archaeological Assets of the Commonwealth?

Yes No

5. impact upon an Area of Critical Environmental Concern? Yes No
If you answered 'Yes' to any of these 5 questions, explain below:

PROJECT CHANGE DESCRIPTION (attach additional pages as necessary). The project change description should include:

- (a) a brief description of the project as most recently reviewed
- (b) a description of material changes to the project as previously reviewed,
- (c) if applicable, the significance of the proposed changes, with specific reference to the factors listed 301 CMR 11.10(6), and
- (d) measures that the project is taking to avoid damage to the environment or to minimize and mitigate unavoidable environmental impacts. If the change will involve modification of any previously issued Section 61 Finding, include a draft of the modified Section 61 Finding (or it will be required in a Supplemental EIR).

Please see attached September 18, 2017 letter, including Technical Support Document prepared by Epsilon Associates and a Pumping Test Report prepared by Sanborn Head & Associates.

The Project as designed will use demineralized water for the purpose of minimizing the formation of nitrogen oxides (NO_x) in the combustion turbines. At the outset of the MEPA review, the volume of water required for this purpose was 97,000 gpd on an annual average basis (60% capacity factor, 60 days of ultra-low sulfur diesel (ULSD) fuel). As of the FEIR, water use was reduced somewhat by a change to a three year rolling average capacity factor limit of 43%, although a single year 60% capacity factor was still possible. In parallel, plans for the source of the Project's water supply transitioned from the Town of Medway municipal system to the use of an on-site bedrock well (51,840 gpd), supplemented by water from the Town of Millis municipal system. The Town of Millis municipal supply is from shallow gravel pack wells in the upper reaches of the Charles River. Supplemental water from the Town of Millis system was to be delivered to the Project site via an existing connection to the Town of Medway system.

Following the completion of the Project's MEPA review, the Project completed both the Energy Facilities Siting Board (EFSB) review and the MassDEP air permitting process. The Project also continued good faith discussions with the Town of Millis regarding supplemental water supply from the Town's system.

During this same time period, Exelon made the decision to drill a backup onsite water supply well and conduct the appropriate pump test. The on-site backup well tested out at 28,800 gpd. Exelon also made the decision to run an extended pump test on the original primary onsite well in order to more accurately gauge its full capacity. The results of an extended 10 day pump test of the primary well supported an increase in the continuous yield to 82,000 gpd. This revised yield was well above the maximum annual average water use of 68,800 gpd (43% capacity factor).

In the same time frame, MassDEP was finalizing the Project's air permit. Per the December 2016 air permit, the Project's allowable capacity factor is limited to 43% for the first year of operation, with reductions to 33% by 2025. At a 33% capacity factor, the annual average water

use is approximately 52,000 gpd. Further reductions will follow, as driven by a declining CO2 emissions limit mandated by the air permit.

These developments, when coupled with a more detailed analysis of the use of the Project's 950,000 gallons of water storage led the Project to conclude that it would not need supplemental water from Millis for any reasonably foreseeable operating scenarios.



As a result of the EFSB review of this change, the Project will install three piezometers and provide subsequent water level monitoring and reporting. The Project will also construct an additional ground water recharge basin at a site identified by the Charles River Watershed Association.

ATTACHMENTS & SIGNATURES

Attachments:

1. Secretary's most recent Certificate on this project
2. Plan showing most recent previously-reviewed proposed build condition
3. Plan showing currently proposed build condition
4. Original U.S.G.S. map or good quality color copy (8-1/2 x 11 inches or larger) indicating the project location and boundaries
5. List of all agencies and persons to whom the proponent circulated the NPC, in accordance with 301 CMR 11.10(7)

Signatures:

<p><u>10/11/17</u> </p> <p>Date Signature of Responsible Officer or Proponent</p> <p><u>Peter R. Callahan</u></p> <p>Name (print or type)</p> <p><u>Exelon Power</u></p> <p>Firm/Agency</p> <p><u>173 Alford Street</u></p> <p>Street</p> <p><u>Charlestown, MA 02129</u></p> <p>Municipality/State/Zip</p> <hr/> <p>Phone 508 533-3905</p>	<p><u>10/11/2017</u> </p> <p>Date Signature of person preparing NPC (if different from NPC)</p> <p><u>Theodore A. Barten</u></p> <p>Name (print or type)</p> <p><u>Epsilon Associates, Inc</u></p> <p>Firm/Agency</p> <p><u>3 Mill & Main Place, Suite 250</u></p> <p>Street</p> <p><u>Maynard, Ma, 01754</u></p> <p>Municipality/State/Zip</p> <hr/> <p>Phone 978-897-7100</p>
--	---