



## Orange Water Department

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**Water  
Commissioners**  
Michael Hume  
Mercedes Clingerman  
Leon Lefebvre

**Superintendent**  
Kenneth R. Wysk

**Regular Meetings**  
2nd Monday  
4:00pm

May 22, 2025

Andy Greene/Energy Facilities Siting Board (EFSB)  
Rick Collins/Department of Energy Resources (DOER)  
EFSB/DOER Siting Staff

RE: Energy Storage System Locations

Mr. Greene, Mr. Collins, and EFSB/DOER Siting Staff;

This letter has been prepared for you as public comment from the Orange Water Department in the town of Orange MA regarding the DOER and EFSB siting regulations currently being drafted. In particular, these comments concern energy storage systems (ESS) and their placement within sensitive drinking water recharge areas, such as Zone II's for public drinking water supplies.

As the Water Superintendent of the Orange Water Department, I share the concerns of potential contamination from fire events associated with these types of facilities with others that I have heard from, as monitoring activities surrounding my water supply are within the role of my job. I currently have a proposal for the installation of a facility in my Zone II, roughly 1,325 feet away from my primary water supply well that supplies 70% of the drinking water to over 6,000 consumers in my town, as well as the fire protection water reserves for the business and residents in our community. My concern for a fire event is based on my understanding of the large amount of fire suppression water that would need to be used directly bringing contaminants into the aquifer within the established defined recharge area. I am pulling on average well over 300,000 gallons of water a day from this aquifer, and Zone II is considered the immediate recharge area for the water supply by delineation, so any contamination within it would be expected to be on a direct path to the well. Where a facility is located would make a considerable difference in the remediation needs when/if a potential worst case scenario becomes a reality.

Many of my responsibilities are to evaluate situations based on worse case scenarios, as per MassDEP and EPA guidelines, and having Emergency Response Plans in place for these scenarios. I urge EFSB and DOER to also consider worse case scenarios when setting regulations in regards to allowable placement of large scale ESS's, and prohibit them from Zone II's to ensure protection for communities and their drinking water. I hope to never have to utilize the plan that is in place for having to isolate my primary source of drinking water for over 6,000 people due to contamination, especially if it was for something that could have been easily avoided.

Thank you for your consideration.

Most Respectfully,

Kenneth R. Wysk  
Water Superintendent  
Orange Water Department