



STATE OF CONNECTICUT

COUNCIL ON ENVIRONMENTAL QUALITY

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Peter Hearn  
Executive Director

February 26, 2020

Melanie Bachman, Executive Director  
Connecticut Siting Council  
Ten Franklin Square  
New Britain, CT 06051

RE: PETITION NO. 1393 – Doosan Fuel Cell America, Inc. (Petitioner) petition for a declaratory ruling for the proposed construction, maintenance and operation of a 440-kilowatt customer-side fuel cell facility and associated equipment to be located at Cherry Street Lofts, 375 Howard Avenue, Bridgeport, Connecticut.

Dear Ms. Bachman:

The Council on Environmental Quality (“the Council”) has reviewed the Petition for Declaratory Ruling noted above and offers the following comments for consideration by the Connecticut Siting Council. The Council supports the deployment of clean, distributed generation technologies at appropriate sites in Connecticut to reduce energy costs to consumers, increase energy reliability, and enhance environmental quality.

In the case of the proposed installation at the Cherry Street Lofts, the Petitioner has used the wrong standard in its noise analysis. The Petitioner states that the proposed fuel cell and cooling module are to be located in a courtyard “where the host property and adjoining properties within the courtyard are all zoned for mixed use industrial”. The zoning for the property is not the standard that applies under State law. It is the use of the property, not its zoning that determines the noise standard. The website for Cherry Street Lofts in Bridgeport states that “Cherry Street Lofts will offer industrial style studio, one, two and three bedroom apartment homes”. The use at the site, once renovated, will be residential. Consequently, the noise standard for a residential receptor is the correct standard to apply to this Petition.

The Regulations of Connecticut State Agencies Sec 22a-69-3.5 limits the noise from a Class C emitter (industrial) to a Class A receptor (residential) to 50 dBA during the day and 45 dBA at night. The Petition states “The City of Bridgeport noise level ordinance specifies a maximum of 70 dBA from an industrial emitter to an Industrial receptor.” It further states that “The closest location zoned residential is 300 ft. from the proposed fuel cell location. Noise from the fuel cell area to this residential zoning will be significantly impeded by the buildings surrounding the courtyard”, apparently overlooking the fact that the buildings which compose the courtyard will be residences too.

Based on the Petition’s statement that “The fuel cell and associated cooling module is expected to operate at full power (440 kW), with a noise level in free field of below 65dBA at 40 feet”, it does not appear that it meets the requirement for noise

generation that is mandated by State regulation.

Noise diminishes with distance. The Petitioner should, at a minimum undertake a noise study to determine which of the units in the development will be effected by noise from the fuel cell and associated cooling unit and to assess the sound abatement measures that will be necessary for the combined fuel cell and cooling module to comply with the State Regulations.

Thank you for your consideration of these comments. Please do not hesitate to contact the Council if you have any questions.

Sincerely,

A handwritten signature in cursive script that reads "Peter Hearn". The signature is written in black ink and has a long horizontal flourish extending to the right.

Peter Hearn,  
Executive Director