



**Lee D. Hoffman**

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April 23, 2021

**Via Electronic Filing**

Melanie Bachman, Executive Director/Staff Attorney  
Connecticut Siting Council  
10 Franklin Square  
New Britain, CT 06051

**Re: DOCKET NO. 497 - Burlington Solar One, LLC Application for a Certificate of Environmental Compatibility and Public Need, pursuant to Connecticut General Statutes §4-176 and §16-50k, for the Proposed Construction, Maintenance and Operation of a 3.5-Megawatt AC Solar Photovoltaic Generating Facility Located at Lot 33, Prospect Street, Burlington, Connecticut, and Associated Electrical Interconnection.**

Dear Ms. Bachman:

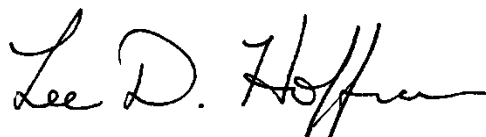
I am writing on behalf of my client, Burlington Solar One, LLC (“Burlington Solar One”; the “Applicant”), in connection with the above-referenced Application. Specifically, Burlington Solar One wishes to revise its March 16, 2021 response to the Council’s (Set One) Interrogatory No. 38 (“Response No. 38”), relating to the Toxicity Characteristic Leaching Procedure (“TCLP”) testing of the Project’s proposed Trina and Risen solar modules (collectively, the “Modules”), based on new information it received concerning the same.

Burlington Solar One recently obtained the respective manufacturers’ TCLP test results for the Modules (the “TCLP Test Results”), attached hereto under Exhibit A, evidencing that neither the Trina nor Risen panels would be characterized as “hazardous waste” at the time of their disposal. Consequently, as of this date, Response No. 38 is no longer entirely accurate. Burlington Solar One is revising Response No. 38 solely to reflect that the Modules passed the TLCP testing, and therefore, would not be characterized as “hazardous waste” at the time of disposal.

Page 2

Should you have any questions concerning this submittal, please contact me at your convenience. I certify that copies of this submittal have been submitted to all parties on the Application's Service List as of this date.

Sincerely,

A handwritten signature in black ink that reads "Lee D. Hoffman". The signature is written in a cursive, flowing style.

Lee D. Hoffman

Enclosure

# Test Report

REPORT No.: SHE19-09277

ATTENTION: Shubo YANG

DATE RECEIVED: 2019/09/02

CUSTOMER: Risen Energy Co.,Ltd

DATE REPORTED: 2019/10/16


Tashan Industry Zone,Meilin  
Street,Ninghai County Ningbo


SAMPLE (S): Solid (1)


REFERENCE: -

## REMARKS

1.The results apply to the sample(s) as received

Edited by:   
Min ZHOU

Reviewed by:   
Jing REN

Approved by:   
Liqiong TANG



## 声明 Statement

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4. 检测报告涂改无效。

The test report is invalid if altered.

5. 本检测报告以中文为准，英文文本 (如有) 仅为译文，两者发生冲突时，应以中文文本为准。

The test report has been drafted in Chinese and translated into English (if applicable) for convenience only. In the event of discrepancy, the Chinese version shall prevail.

6. 如对本检测报告有异议，请在收到报告10天之内与本公司联系。

Should you have any queries or objection to the test report, please contact us within 10 days after receiving the report.

### 符号表/Legend

NA 样品未测试该参数/The sample was not analysed for this analyte

↑ 提高检出限/Detection limit raised

↓ 降低检出限/Detection limit lowered

ND 未检出/Not Detected



## INORGANIC & ORGANIC ANALYSIS

Report No.: SHE19-09277

Customer Reference: -

Lab ID	SHE19-09277.001
Customer ID	光伏组件 441425 0811673
Date Received	2019/09/02

ITEM	METHOD	LOR	UNIT	Limit	Solid
Arsenic (As)	USEPA 200.8-1994	0.05	mg/L	≤5	<0.050
Barium (Ba)	USEPA 200.8-1994	0.01	mg/L	≤100	<0.010
Cadmium (Cd)	USEPA 200.8-1994	0.001	mg/L	≤1	<0.001
Chromium (Cr)	USEPA 200.8-1994	0.01	mg/L	≤5	<0.010
Lead (Pb)	USEPA 200.8-1994	0.01	mg/L	≤5	<b>3.85</b>
Selenium (Se)	USEPA 200.8-1994	0.05	mg/L	≤1	<0.050
Silver (Ag)	USEPA 200.8-1994	0.01	mg/L	≤5	<0.010
Mercury (Hg)	USEPA 7473-2007	0.005	mg/L	≤0.2	<0.005
2,4-D	USEPA 8151A-1996	0.0005	mg/L	≤10	<0.0005
2,4,5-TP (Silvex, Fenopop)	USEPA 8151A-1996	0.0005	mg/L	≤1	<0.0005
Benzene	USEPA 8260D-2018	0.0005	mg/L	≤0.5	<0.0005
Carbon tetrachloride	USEPA 8260D-2018	0.0005	mg/L	≤0.5	<0.0005
Chlorobenzene	USEPA 8260D-2018	0.0005	mg/L	≤100	<0.0005
Chloroform	USEPA 8260D-2018	0.0005	mg/L	≤6	<0.0005
1,4-Dichlorobenzene	USEPA 8260D-2018	0.0005	mg/L	≤7.5	<0.0005
1,2-Dichloroethane	USEPA 8260D-2018	0.0005	mg/L	≤0.5	<0.0005
1,1-Dichloroethene	USEPA 8260D-2018	0.0005	mg/L	≤0.7	<0.0005
2-butanone(MEK)	USEPA 8260D-2018	0.02	mg/L	≤200	<0.020
Tetrachloroethene	USEPA 8260D-2018	0.0005	mg/L	≤0.7	<0.0005
Trichloroethene	USEPA 8260D-2018	0.0005	mg/L	≤0.5	<0.0005
Vinyl chloride	USEPA 8260D-2018	0.0005	mg/L	≤0.2	<0.0005
2,4-Dinitrotoluene	USEPA 8270E-2018	0.0005	mg/L	≤0.13	<0.0005
Hexachlorobenzene	USEPA 8270E-2018	0.0005	mg/L	≤0.13	<0.0005
Hexachlorobutadiene	USEPA 8270E-2018	0.0005	mg/L	≤0.5	<0.0005



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## INORGANIC & ORGANIC ANALYSIS

Report No.: SHE19-09277

Customer Reference: -

		Lab ID		Limit	SHE19-09277.001
		Customer ID			光伏组件 441425 0811673
		Date Received			2019/09/02
ITEM	METHOD	LOR	UNIT		<b>Solid</b>
Hexachloroethane	USEPA 8270E-2018	0.0005	mg/L	≤3	<0.0005
Nitrobenzene	USEPA 8270E-2018	0.0005	mg/L	≤2	<0.0005
Pentachlorophenol	USEPA 8270E-2018	0.0025	mg/L	≤100	<0.0025
Pyridine	USEPA 8270E-2018	0.002	mg/L	≤5.0	<0.002
2,4,5-Trichlorophenol	USEPA 8270E-2018	0.0005	mg/L	≤400	<0.0005
2,4,6-Trichlorophenol	USEPA 8270E-2018	0.0005	mg/L	≤2	<0.0005
Methylphenol	USEPA 8270E-2018	0.001	mg/L	≤200	<0.001
2-Methylphenol	USEPA 8270E-2018	0.0005	mg/L	≤200	<0.0005
3&4-Methylphenol	USEPA 8270E-2018	0.0005	mg/L	≤200	<0.0005
Endrin	USEPA 8270E-2018	0.0005	mg/L	≤0.02	<0.0005
γ-BHC	USEPA 8270E-2018	0.0005	mg/L	≤0.4	<0.0005
Toxaphene	USEPA 8270E-2018	0.05	mg/L	≤0.5	<0.050
Methoxychlor	USEPA 8270E-2018	0.0005	mg/L	≤10	<0.0005
Heptachlor	USEPA 8270E-2018	0.0005	mg/L	≤0.008	<0.0005
Chlordane(Total)	USEPA 8270E-2018	0.001	mg/L	≤0.03	<0.001

Remark:

Preparative method:USEPA1311-1992(Toxicity Characteristic Leaching Procedure)

The Limits comes from CFR(code of federal regulations) title 40 part 261.24.

The test report shall only be used for client scientific research, teaching, internal quality control, product research and development, etc... and just for client internal reference.



## Method List

USEPA 200.8-1994 Metals ICP-MS  
 USEPA 7473-2007 Metals-Hg  
 USEPA 8151A-1996 Acid Herbicides in Water by GC-MS  
 USEPA 8260D-2018 VOCs  
 USEPA 8270E-2018 SVOCs

## Equipment information

### Method:USEPA 200.8-1994

Equipment Name	Model	Equipment Number	Serial Number
ICP-MS	Agilent 7900	CHEM-779	JP14330369

### Method:USEPA 7473-2007

Equipment Name	Model	Equipment Number	Serial Number
Hg analyzer	Milestone DMA-80	CHEM-958	16041979

### Method:USEPA 8151A-1996

Equipment Name	Model	Equipment Number	Serial Number
GC-MS	Agilent 7890A/5975C	CHEM-ENV085	CN12371032/US12362A17
GC-MS	Agilent 7890B/5977A	CHEM-ENV090	CN13323155/US1333N202

### Method:USEPA 8260D-2018

Equipment Name	Model	Equipment Number	Serial Number
PT-GC-MS	AQUATEk100&Agilent7890B/5975A	CHEM-937	US15240014/CN15423234/US1541L452

### Method:USEPA 8270E-2018

Equipment Name	Model	Equipment Number	Serial Number
GC-MS	Agilent 7890B/5977B	CHEM-1013	CN16433131/US1643M01

### Method:USEPA 8270E-2018

Equipment Name	Model	Equipment Number	Serial Number
GC-MS	Agilent 7890B/5977B	CHEM-1013	CN16433131/US1643M01



**The following information is provided by the customer:**

To Whom It May Concern, Risen Energy Co., Ltd. has delivered samples on 27th August, 2019. For the materials of the samples, please see the table below.

The relevant information listed below is included in the finished product. The above content is true and effective. If the information is false, all the responsibilities are borne by the company.

SN.	TYPE OF MATERIAL	BOM 1		
		Type	RSM144-6-380BMDG	
		Serial number	441425I0811673	
		VENDOR	TYPE/MODEL	REMARKS
1	SOLAR CELL	Risen Energy Co., Ltd.	RSTDB156B	5BB(1/2cut), 157.75x78.88 ± 1.5mm, thickness: 180 ± 18um, area: 123.55±2.35cm <sup>2</sup>
2	SUPERATE	CNBM(Yixing) New Energy Resources Co., Ltd.	ARC Glass	2.0mm
3	SUBSTRATE	CNBM(Yixing) New Energy Resources Co., Ltd.	Glass	2.0mm
4	ENCAPSULATION MATERIAL (Front)	Changzhou Sveck PV NEW MATERIAL CO., LTD.	SE-556	Thickness: 0.5mm (0.45~0.55mm) for both sides
5	ENCAPSULATION MATERIAL (Back)	Changzhou Sveck PV NEW MATERIAL CO., LTD.	SE-556	Thickness: 0.45~0.55mm for both sides
6	FRAME PARTS	Zhejiang Twinsel Electronic Technology Co., Ltd.	6063 T5	2016x998x25mm
7	CELL CONNECTOR	Zhejiang Twinsel Electronic Technology Co., Ltd.	Cu Purity ≥99.97%	0.21*1.0mm
8	STRING CONNECTOR	Zhejiang Twinsel Electronic Technology Co., Ltd.	Cu Purity ≥99.97%	0.35*6/0.3*4/0.4*4mm
9	LRF	Changzhou Sveck New Material Technology Co., Ltd.	SVK-FG01	Thickness: 0.12 ± 0.02mm
10	ADHESIVE (FRAME)	Suzhou Tonsan Adhesive Co., Ltd.	1527	
11	FIXING TAPE	Teraoka Seisakusho	631S	
12	FLUXING AGENT	Asahi SOLDER	SF56	





**The following information is provided by the customer:**

To Whom It May Concern, Risen Energy Co., Ltd. has delivered samples on 27th August, 2019. For the materials of the samples, please see the table below.

The relevant information listed below is included in the finished product. The above content is true and effective. If the information is false, all the responsibilities are borne by the company.

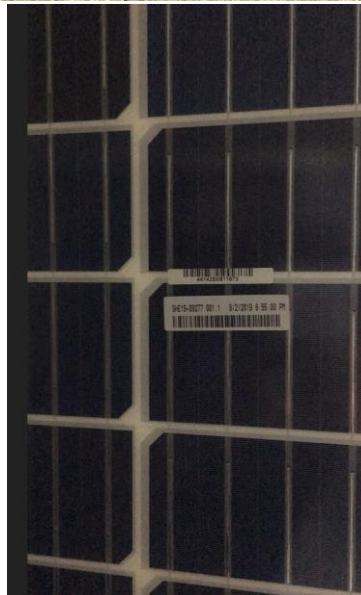
SN.	TYPE OF MATERIAL	BOM 1		
		Type		RSM144-6-380BMDG
		Serial number		441425I0811673
		VENDOR	TYPE/MODEL	REMARKS
13	JUNCTION BOX	Zhejiang Twinsel Electronic Technology Co., Ltd.	PV-SY017	DC1500V, 15A, IP68
14	CABLES	Zhejiang Twinsel Electronic Technology Co., Ltd.	H1Z2Z2-K	1x4.0mm <sup>2</sup>
15	CONNECTORS	Zhejiang Twinsel Electronic Technology Co., Ltd.	PV-SY02	DC1500V, 30A, IP68
16	BYPASS DIODES	Zhejiang Twinsel Electronic Technology Co., Ltd.	SBRB3050TS	Max. PRV 50V
17	ADHESIVE (JUNCTION BOX)	Suzhou Tonsan Adhesive Co., Ltd.	1527	
18	POTTING MATERIAL	Suzhou Tonsan Adhesive Co., Ltd.	1521	



## APPENDIX

Report No.:SHE19-09277

Customer Reference: -



\*\*\*End of report\*\*\*



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# Test Report

REPORT No.: SHE20-11364/1      DATE RECEIVED: 2020/10/12

ATTENTION: Ya XIAO      ANALYSIS DATE : 2020/10/12~2020/10/22

CUSTOMER: Trina Solar Co., Ltd.      DATE REPORTED: 2020/10/22

No.2 TianHe Road, Trina PV  
Industrial Park, New District,  
Changzhou City, Jiangsu Province  
213031, P. R

SAMPLE (S): Solid waste (1)

REFERENCE: -

## REMARKS

- 1.The results apply to the sample(s) as received
- 2.The report is translated from SHE20-11364.

Edited by:   
Min ZHOU

Reviewed by:   
Jun MENG

Approved by:   
Liqiong TANG



## Statement

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6. Should you have any queries or objection to the test report, please contact us within 10 days after receiving the report.

### Legend

NA The sample was not analysed for this analyte

↑ Detection limit raised

↓ Detection limit lowered

ND Not Detected



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## INORGANIC & ORGANIC ANALYSIS

Report No.: SHE20-11364/1

Customer Reference: -

		Lab ID		SHE20-11364.001	
		Customer ID		TSM-xxDEG15MC.20(II) 光伏组件	
		Model No		SHES2010019995TX	
		Date Received		2020/10/12	
				Limit	
TCLP ITEM	METHOD	MDL	UNIT		<b>Solid waste</b>
Arsenic (As)	USEPA 200.8-1994	0.050	mg/L	≤5	<0.050
Barium (Ba)	USEPA 200.8-1994	0.010	mg/L	≤100	<b>0.116</b>
Cadmium (Cd)	USEPA 200.8-1994	0.001	mg/L	≤1	<0.001
Chromium (Cr)	USEPA 200.8-1994	0.010	mg/L	≤5	<0.010
Lead (Pb)	USEPA 200.8-1994	0.010	mg/L	≤5	<0.010
Selenium (Se)	USEPA 200.8-1994	0.050	mg/L	≤1	<0.050
Silver (Ag)	USEPA 200.8-1994	0.010	mg/L	≤5	<0.010
Mercury (Hg)	USEPA 7473-2007	0.005	mg/L	≤0.2	<0.005

Remark:

- 1.Preparative method:USEPA1311-1992(Toxicity Characteristic Leaching Procedure)
- 2.The Limits comes from CFR(code of federal regulations) title 40 part 261.24.



## Method List

USEPA 200.8-1994 Metals ICP-MS  
 USEPA 7473-2007 Metals-Hg

## Equipment Information

### Method:USEPA 200.8-1994

Equipment Name	Model	Equipment Number	Serial Number
ICP-MS	Agilent 7900	CHEM-998	JP16311502

### Method:USEPA 7473-2007

Equipment Name	Model	Equipment Number	Serial Number
Hg analyzer	Milestone DMA-80	CHEM-958	16041979



## APPENDIX

Report No.:SHE20-11364/1

Customer Reference: -



\*\*\*End of report\*\*\*