



STATE OF CONNECTICUT

CONNECTICUT SITING COUNCIL

Ten Franklin Square, New Britain, CT 06051

Phone: (860) 827-2935 Fax: (860) 827-2950

E-Mail: siting.council@ct.gov

www.ct.gov/csc

March 25, 2015

TO: Parties and Intervenors

FROM: Melanie A. Bachman *MAB*
Acting Executive Director

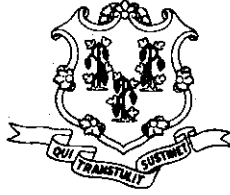
RE: **DOCKET 192B**- CPV Towantic, LLC Motion to Reopen and Modify the June 23, 1999 Certificate of Environmental Compatibility and Public Need based on changed conditions pursuant to Connecticut General Statutes §4-181a(b) for the construction, maintenance and operation of a 785 MW dual-fuel combined cycle electric generating facility located north of the Prokop Road and Towantic Hill Road intersection in the Town of Oxford, Connecticut.

The Connecticut Siting Council (Council) is in receipt of correspondence from Senator Joan Hartley, Representative Anthony D'Amelio, and Senator Joseph Crisco dated March 24, 2015 concerning the above-referenced Motion to Reopen.

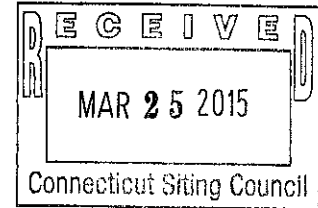
Copies of Senator Hartley, Representative D'Amelio, and Senator Crisco's correspondence are being distributed to all participants in this proceeding and will also be administratively noticed in the record.

MAB/MP/cm

c: Council Members



State of Connecticut
GENERAL ASSEMBLY
STATE CAPITOL
HARTFORD, CONNECTICUT 06106-1591



March 24, 2015

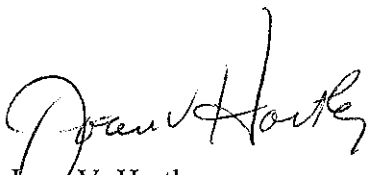
State of Connecticut
Connecticut Siting Council
10 Franklin Square
New Britain, Connecticut 06051
Attention: Melanie A. Bachman, Executive Director
Re: Docket 192B – Towantic Energy


Dear Attorney Bachman and Connecticut Siting Council Commissioners,


Relative to the Council's deliberations on Docket 192B, we feel that it is imperative that the most recent Federal Aviation Administration memorandum addressing Thermal Exhaust Plume Impact on airport operations be reviewed and considered in the deliberations of said Docket.

The Federal Aviation Administration memorandum on this subject is attached. We would like to particularly emphasize the Federal Aviation Administration's determination of overall risk associated with thermal exhaust plumes and their findings relative to airport operations. Thank you for your receipt and review of this most critical information.

Sincerely,

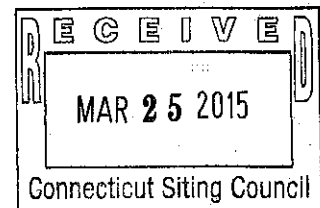

Joan V. Hartley
State Senator, 15th District


Anthony D'Amelio
State Representative, 71st District


Joe Crisco
State Senator, 17th District



Federal Aviation Administration



Memorandum

Date: JAN 21 2015

To: Regional Airports Division Managers
610 Branch Managers
620 Branch Managers
Airports District Office Managers

From: *[Signature]*
Director, Office of Airport Planning and Programming (APP-1)
[Signature]
Director, Office of Airport Safety and Standards (AAS-1)

Subject: Technical Guidance and Assessment Tool for Evaluation of Thermal Exhaust Plume Impact on Airport Operations

The Federal Aviation Administration (FAA) has received several inquiries and requests from state and local government and airport operators for guidance on the appropriate separation distance between power plants and airports where exhaust plumes from power plant smoke stacks and cooling towers may cause disruption to aircraft near Federally-obligated airports. The only related FAA regulations address the physical restrictions of the exhaust stack height. There are no FAA regulations protecting for plumes and other emissions from exhaust stacks.

In response, the FAA's Airport Obstruction Standards Committee (AOSC) was tasked to study the impact exhaust plumes may have on flight safety. The AOSC study evaluated the following:

1. How much turbulence is created by the exhaust plumes?
2. Is this turbulence great enough to cause loss of pilot control?
If so, what size aircraft are impacted?
3. Is there a lack of oxygen (within a plume) causing loss of engine or danger to pilot/passengers?
4. Are there harmful health effects to the pilot or passengers from flying through the plume?

After thorough analysis, the FAA has determined the overall risk associated with thermal exhaust plumes in causing a disruption of flight is low. However, the FAA has determined that thermal exhaust plumes in the vicinity of airports may pose a unique hazard to aircraft in critical phases of flight (particularly takeoff, landing and within the pattern) and therefore are incompatible with airport operations.

Flight within the airport traffic pattern, approach and departure corridors, and existing or planned flight procedures may be adversely affected by thermal exhaust plumes¹. The FAA-sponsored research indicates that the plume size and severity of impact on flight can vary greatly depending on several factors at a site such as:

- Stack size, number, and height; type of exhaust or effluent (e.g., coolant tower cloud, power plant smoke, etc.);
- Proximity of stacks to the airport flight paths;
- Temperature and vertical speed of the effluent;
- Size and speed of aircraft encountering exhaust plumes; and
- Local winds, ambient temperatures, stratification of the atmosphere at the plume site.

Airport sponsors and land use planning and permitting agencies around airports are encouraged to evaluate and take into account potential flight impacts from existing and planned development that produce plumes (such as power plants or other land uses that employ smoke stacks, cooling towers or facilities that create thermal exhaust plumes).

To aid these reviews the FAA contracted MITRE Corporation to develop a model to predict plume size and severity of flight impact from a site of thermal exhaust plume(s). MITRE developed the "Exhaust-Plume-Analyzer" and it is available for no cost. Access can be found for licensing and downloading from MITRE at:
<http://www.mitre.org/research/technology-transfer/technology-licensing/exhaust-plume-analyzer>

The MITRE Exhaust-Plume-Analyzer can be an effective tool to assess the impact exhaust plumes may impose on flight operations at an existing or proposed site in the vicinity of an airport.

The FAA Advisory Circular (AC) 5190-4, A Model Zoning Ordinance to Limit the Height of Objects Around Airports (Airport Compatible Land Use Planning), is currently being updated to include comprehensive guidance to airport sponsors and local community planners on airport compatible land use issues, including evaluation of thermal exhaust plumes. The updated AC is expected to be issued in FY 2015.

¹ On July 24, 2014, the FAA issued a change to the Aeronautical Information Manual (AIM) to update terminology and provide more detail regarding the associated hazards of exhaust plumes. See the updated AIM flight instruction to pilots at Section 5-5-15, Avoid Flight in the Vicinity of Exhaust Plumes (Smoke Stacks, Cooling Towers) at http://www.faa.gov/air_traffic/publications/atpubs/aim/aim0705.html.

In the interim, please provide this technical memorandum to airport sponsors to advise them of the availability of the Exhaust-Plume-Analyzer. Sponsors, state and local planning organizations, and permitting jurisdictions now have the opportunity to ensure that their planning and land use development decisions adequately evaluate the potential effects of thermal exhaust plumes on airport operations.

Should you have any questions concerning this memorandum please contact Rick Etter, Airport Planning and Environmental Division (APP-400) at 202-267-8773 or by email at rick.etter@faa.gov.