

**STATE OF CONNECTICUT  
CONNECTICUT SITING COUNCIL**

AN APPLICATION BY TOWANTIC ENERGY, LLC : DOCKET NO. 192B  
FOR A CERTIFICATE OF ENVIRONMENTAL  
COMPATIBILITY AND PUBLIC NEED FOR THE  
CONSTRUCTION, MAINTENANCE AND OPERATION  
OF A PROPOSED ELECTRIC GENERATING FACILITY  
LOCATED NORTH OF THE PROKOP ROAD AND : FEBRUARY 9, 2015  
TOWANTIC HILL ROAD INTERSECTION IN THE  
TOWN OF OXFORD, CONNECTICUT

**INTERROGATORIES & REQUESTS FOR PRODUCTION  
DIRECTED TO CPV/TOWANTIC, LLC**

1. In your responses to Borough of Naugatuck (hereinafter referred to as "BON") interrogatory question #1, you provide a chart that compares the water discharge profile of the old 512 MW facility and the proposed 785 MW facility. There is a huge disparity between the water discharge under the 512 MW facility versus the 785 MW facility. What specific processes, in layman's terms, have been modified and how do they account for this change?

- a. Are the numbers contained in this chart "daily averages" or "maximums"?
- b. What modeling studies have been done to determine what the water discharge profile will be under the 785 MW facility?
- c. If the answer to (b) is in the affirmative, is this data contained in the exhibits to CPV's Petition to Reopen and Modify dated November 3, 2014?

2. In response to BON interrogatory questions #1 and #2, you state that the maximum amount of wastewater discharged by CPV will be 4.5 gallons per minute, the rough equivalent of a garden hose, and 6,480 gallons per day. This volume is based on the facility being fueled by either natural gas (NG) or ultra-low sulfur distillate (ULSD), at full plant load and across all ambient temperatures. So, there will be no difference in the wastewater discharge when the facility is operating on NG v. ULSD?

- a. Under the 512 MW facility, why was there a difference in the wastewater discharge profile when it was operating on NG and ULSD? i.e., 84,672 gpd when operating on NG and 77,616 gpd when operating on oil, and under the 785 MW facility, the gpd is the same for either NG or ULSD?

3. Is it possible that the discharge from the Facility will ever exceed 1 million gallons/day?
4. Has a characterization study of the wastewater been completed?
5. On page 26 of the Tetra Tech Report, it says that under ULSD operation, the quantity of water required to be drawn from Heritage Village Water Company will be between 954,720 and 1,025,280 gpd. In response to BON's interrogatory question #1, the chart indicates that the water discharge profile when operating under either NG or ULSD is 6,480 gpd. How does the 954,720 - 1,025,280 gallons of water per day from Heritage get reduced to a nominal 6,480 gpd of effluent?
6. In response to BON interrogatory #3, you describe the discharge, characterized as "wastewater", and how it will be associated with three distinct sources. What processes/treatments will sources "b" and "c" go through prior to being discharged from the facility?
7. What will be the chemical makeup of the effluent?
8. What is going to be found in the water from equipment drains and turbine building floor drains?
9. In response to BON interrogatory #3, you indicate that there will be an addition of oil and suspended solids resulting from floor and equipment wash down. How can the BON be sure that nothing harmful will be contained in this?
10. Are there any other dual-fuel facilities like this in the United State? Elsewhere?
  - a. If yes, have any modeling studies been done to measure the volume, quality and content of the effluent from those facilities?

Respectfully submitted,

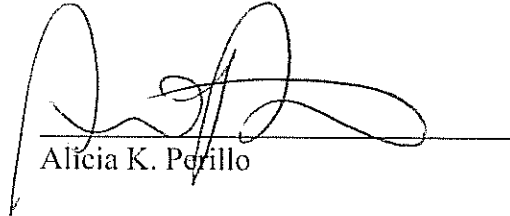
BOROUGH OF NAUGATUCK and  
WATER POLLUTION CONTROL AUTHORITY,

BY: 

Alicia K. Perillo, Esq.  
Fitzpatrick | Mariano | Santos | Sousa, PC  
Its Attorney  
203 Church Street  
Naugatuck, CT 06770

**CERTIFICATION**

This is to certify that on this 9<sup>th</sup> day of February, 2015, an original and fifteen (15) copies of the foregoing were delivered by regular mail to The Connecticut Siting Council, 10 Franklin Square, New Britain, CT 06051, and one copy was served on all other intervenors and parties on the attached list by way of electronic mail.



Alicia K. Perillo

**LIST OF PARTIES AND INTERVENORS  
SERVICE LIST**

Status Granted	Status Holder (name, address & phone number)	Representative (name, address & phone number)
<b>Applicant</b>	CPV Towantic, L.L.C.	Franca L. DeRosa, Esq. Philip M. Small, Esq. Brown Rudnick LLP 185 Asylum Street Hartford, CT 06103 (860) 509-6500 (860) 509-6501 – fax <a href="mailto:fderosa@brownrudnick.com">fderosa@brownrudnick.com</a> <a href="mailto:psmall@brownrudnick.com">psmall@brownrudnick.com</a>
<b>Party</b>	Jay Halpern 58 Jackson Cove Road Oxford, CT 06478 h: 203-888-4976 <a href="mailto:zoarmonster@sbcglobal.net">zoarmonster@sbcglobal.net</a>  Peter Thomas 72 Towantic Hill Rd. Oxford, CT 06478 203-720-1536	
<b>Intervenor</b>	Town of Middlebury	Attorney Dana A. D'Angelo Law Offices of Dana D'Angelo, LLC 20 Woodside Avenue Middlebury, CT 06762 (203) 598-3336 (203) 598-7283 – fax <a href="mailto:Dangelo.middlebury@snet.net">Dangelo.middlebury@snet.net</a>  Stephen L. Savarese, Esq. 103 South Main Street Newtown, CT 06470 203-270-0077 <a href="mailto:attystephensavarese@gmail.com">attystephensavarese@gmail.com</a>
<b>Intervenor</b>	The Connecticut Light and Power Company (CL&P)	Stephen Gibelli, Esq. Associate General Counsel The Connecticut Light and Power Company P.O. Box 270 Hartford, CT 06141-0270 (860) 665-5513 (860) 665-5504 –fax <a href="mailto:gibels@nu.com">gibels@nu.com</a>

Status Granted	Status Holder (name, address & phone number)	Representative (name, address & phone number)
	CL&P continued...	<p>John R. Morissette  Manager-Transmission Siting and Permitting  The Connecticut Light and Power Company  P.O. Box 270  Hartford, CT 06141-0270  (860) 665-2036  <a href="mailto:morisjr@nu.com">morisjr@nu.com</a></p> <p>Christopher R. Bernard  Manager, Regulatory Policy (Transmission)  The Connecticut Light and Power Company  P.O. Box 270  Hartford, CT 06141-0270  (860) 665-5967  (860) 665-3314 – fax  <a href="mailto:bernacr@nu.com">bernacr@nu.com</a></p> <p>Stella Pace, Senior Engineer  The Connecticut Light and Power Company  Transmission and Interconnection Dept.  P.O. Box 270  Hartford, CT 06141-0270  (860) 665-3569  <a href="mailto:pacess@nu.com">pacess@nu.com</a></p> <p>Jeffery D. Cochran  Northeast Utilities Service Company  107 Selden Street  Berlin, CT 06037  860-665-3548  <a href="mailto:cochrjd@nu.com">cochrjd@nu.com</a></p>
<b>Party</b>	Town of Oxford	Kevin W. Condon, Esq. Condon & Savitt PC P.O. Box 570 Ansonia, CT 06401 203-734-2511 <a href="mailto:condonsavitt@comcast.net">condonsavitt@comcast.net</a>
<b>Party</b>	Naugatuck Valley Chapter Trout Unlimited	Robert M. Perrella, Vice President TU Naugatuck/Pomperaug Valley Chapter 278 W. Purchase Road Southbury, CT 06488-1004 <a href="mailto:johnnytroutseed@charter.net">johnnytroutseed@charter.net</a>

<b>Intervenor</b>	Town of Southbury	Ed Edelson First Selectman Town of Southbury 501 Main Street Southbury, CT 06488 <a href="mailto:selectman@southbury-ct.gov">selectman@southbury-ct.gov</a> (203) 262-0647 (203) 264-9762 – fax
<b>Party</b>	The Pomperaug River Watershed Coalition	Len DeJong, Executive Director Pomperaug River Watershed Coalition 39 Sherman Hill Road, C103 Woodbury, CT 06798 203-263-0076 <a href="mailto:LDeJong@pomperaug.org">LDeJong@pomperaug.org</a>
<b>Intervenor (approved 06/07/06)</b>	Raymond Pietrorazio 764 Charcoal Avenue Middlebury, CT 06762-1311 (203) 758-2413 (203) 758-9519 – fax <a href="mailto:rav@ctcombustion.com">rav@ctcombustion.com</a>	
<b>Intervenor (approved 10/10/06)</b>	GE Energy Financial Services, Inc.	Jay F. Malcynsky The Law Offices of Jay F. Malcynsky, P.C. One Liberty Square New Britain, CT 06051 (860) 229-0301 (860) 225-4627 – fax <a href="mailto:jmalcynsky@gaffneybennett.com">jmalcynsky@gaffneybennett.com</a>
<b>Intervenor (Approved on November 13, 2014)</b>	Borough of Naugatuck and Borough of Naugatuck Water Pollution Control Authority	Edward G. Fitzpatrick, Esq. Alicia K. Perillo, Esq. Fitzpatrick, Mariano, Santos, Sousa, PC 203 Church Street Naugatuck, CT 06770 203-729-4555 <a href="mailto:Fitz@fmslaw.org">Fitz@fmslaw.org</a> <a href="mailto:alicia@fmslaw.org">alicia@fmslaw.org</a>  Ronald Merancy, Chairman Water Pollution Control Authority 229 Church Street Naugatuck, CT 06770 203-720-7000 <a href="mailto:Rjm62156@aol.com">Rjm62156@aol.com</a>

<b>Intervenor</b> <i>(Approved on  January 8, 2015)</i>	Wayne McCormack 593 Putting Green Lane Oxford, CT 06478 <a href="mailto:wayne@waynemccormack.com">wayne@waynemccormack.com</a>	
<b>Intervenor</b> <i>(Approved on  January 8, 2015)</i>	Naugatuck River Revival Group, Inc.	Kevin R. Zak, President Naugatuck River Revival Group, Inc. 132 Radnor Avenue Naugatuck, CT 06770 <a href="mailto:kznrrg@sbcglobal.net">kznrrg@sbcglobal.net</a> 203-530-7850
<b>Intervenor</b> <i>(Approved on  January 8, 2015)</i>	Westover Hills Subdivision Homeowners	Chester Cornacchia Westover Hills Subdivision Homeowners 53 Graham Ridge Road Naugatuck, CT 06770 203-206-9927 <a href="mailto:cc@necsonline.com">cc@necsonline.com</a>
<b>Intervenor</b> <i>(Approved on  January 8, 2015)</i>	Westover School	Kate J. Truini Alice Hallaran Westover School 1237 Whittemore Road Middlebury, CT 06762 203-758-2423 <a href="mailto:ktruini@westoverschool.org">ktruini@westoverschool.org</a> <a href="mailto:ahallaran@westoverschool.org">ahallaran@westoverschool.org</a>
<b>Intervenor</b> <i>(Approved on  January 8, 2015)</i>	Greenfields, LLC and Marian Larkin	Edward S. Hill, Esq. Cappalli & Hill, LLC 325 Highland Avenue Cheshire, CT 06410 203-272-2607 <a href="mailto:ehill@cappalihill.com">ehill@cappalihill.com</a>
<b>Intervenor</b> <i>(Approved on  January 8, 2015)</i>	Lake Quassapaug Association, LLC	Ingrid Manning, Vice President Lake Quassapaug Association, LLC P.O. Box 285 Middlebury, CT 06762 203-758-1692 <a href="mailto:Ingridmanning2@gmail.com">Ingridmanning2@gmail.com</a>

<p><b>Intervenor</b> (Approved on January 8, 2015)</p>	<p>Middlebury Land Trust, Inc.</p>	<p>W. Scott Peterson, M.D., President Middlebury Land Trust, Inc. 317 Tranquility Road Middlebury, CT 06762 203-574-2020 <a href="mailto:wsp@aya.yale.edu">wsp@aya.yale.edu</a></p>
<p><b>Intervenor</b> (Approved on January 15, 2015)</p>	<p>Quassy Amusement Park</p>	<p>George Frantzis Quassy Amusement Park P.O. Box 1107 Middlebury, CT 06762 203-758-2913 ext 108 <a href="mailto:george@quassy.com">george@quassy.com</a></p>
<p><b>Intervenor</b> (Approved on January 15, 2015)</p>	<p>Middlebury Bridle Land Association</p>	<p>Nancy Vaughan Middlebury Bridle Land Association 61 Sandy Hill Road Middlebury, CT 06762 203-598-0697 <a href="mailto:ndzijaughan@gmail.com">ndzijaughan@gmail.com</a></p>
<p><b>Intervenor</b> (Approved on January 15, 2015)</p>	<p>Dennis Kocyla 28 Benz Street Ansonia, CT 06401 203-736-7182 <a href="mailto:Dennis3141@yahoo.com">Dennis3141@yahoo.com</a></p>	
<p><b>Intervenor</b> (Approved on January 15, 2015)</p>	<p>Naugatuck Valley Audubon Society</p>	<p>Sophie Zyla Jeff Ruhloff Carl Almonte Naugatuck Valley Audubon Society 17 Stoddard Place Beacon Falls, CT 06403 203-888-7945 <a href="mailto:NVASeditor@mail.com">NVASeditor@mail.com</a></p>
<p><b>Intervenor</b> (Approved on January 15, 2015)</p>	<p>Oxford Flying Club</p>	<p>Burton L. Stevens Oxford Flying Club, Inc. P.O. Box 371 Woodbury, CT 06798 203-236-5158 <a href="mailto:bstevens@snet.net">bstevens@snet.net</a></p>