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April 23, 2021

VIA ELECTRONIC MAIL

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

Re: Petition No. 1424 - Southington Solar One, LLC petition for a declaratory ruling, pursuant to Connecticut General Statutes §4-176 and §16-50k, for the proposed construction, maintenance and operation of a 4.725-megawatt AC solar photovoltaic electric generating facility located at 1012 East Street, Southington, Connecticut, and associated electrical interconnection

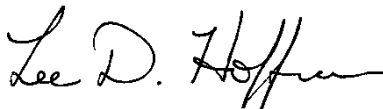
Dear Ms. Bachman:

I am writing on behalf of my client, Southington Solar One, LLC (“Southington Solar One”), in connection with the above-referenced Petition. Specifically, Southington Solar One wishes to revise its March 30, 2021 response to the Council’s (Set 4) Interrogatory No. 71, relating to the Toxicity Characteristic Leaching Procedure testing of the Project’s proposed Trina and Risen solar modules, based on new information it received concerning the same.

Accordingly, enclosed please find Southington Solar One’s revised response to Interrogatory No. 71 and accompanying Exhibit(s).

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

Sincerely,



Lee D. Hoffman

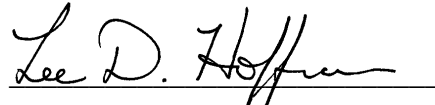
Page 2

71. Has the manufacturer of the proposed solar panels conducted Toxicity Characteristic Leaching Procedure (TCLP) testing to determine if the panels would be characterized as hazardous waste at the time of disposal? Please submit the specifications that indicate the proposed solar modules would not be characterized as hazardous waste. If the project is approved, would the Petitioner consider installing solar modules that are not classified as hazardous waste through TCLP testing?

Yes, the respective manufacturers of the proposed Trina and Risen solar modules conducted Toxicity Characteristic Leaching Procedure (“TCLP”) testing to determine whether the panels would be characterized as “hazardous waste” at the time of disposal. As evidenced by the TLCP test results, attached hereto under Exhibit A, neither the Trina nor Risen panels would be characterized as “hazardous waste” at the time of their disposal. As such, if the Project is approved, it would be comprised exclusively of solar modules that are not classified as “hazardous waste” through TCLP testing.

Respectfully Submitted,

Southington Solar One, LLC



By:

Lee D. Hoffman
Amanda G. Gurren
Pullman & Comley, LLC
90 State House Square
Hartford, CT 06103-3702
Juris No. 409177
860-424-4300 (p)
860-424-4370 (f)
lhoffman@pullcom.com
Its Attorneys

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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The test report is invalid without the signature of the compiler, the checker and the approver

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	3.85
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		SHE19-09277.001	
		Customer ID		光伏组件 441425 0811673	
		Date Received		2019/09/02	
ITEM	METHOD	LOR	UNIT	Limit	Solid
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.



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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 ²
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.

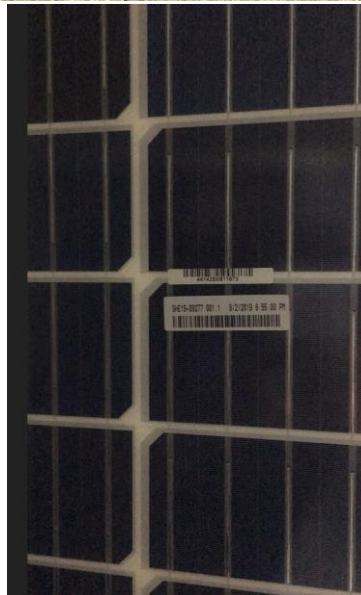
SN.	TYPE OF MATERIAL	BOM 1		
		Type		RSM144-6-380BMDG
		Serial number		441425I0811673
		VENDOR	TYPE/MODEL	REMARKS
13	JUNCTION BOX	Zhejiang Twinsel Electronic Technology Co., Ltd.	PV-SY017	DC1500V, 15A, IP68
14	CABLES	Zhejiang Twinsel Electronic Technology Co., Ltd.	H1Z2Z2-K	1x4.0mm ²
15	CONNECTORS	Zhejiang 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



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Statement

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2. This test report cannot be reproduced in any way, except in full content, without prior approval in writing by the laboratory.
3. The test report is invalid without the signature of the compiler, the checker and the approver
4. The test report is invalid if altered.
5. 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. 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		Solid waste
Arsenic (As)	USEPA 200.8-1994	0.050	mg/L	≤5	<0.050
Barium (Ba)	USEPA 200.8-1994	0.010	mg/L	≤100	0.116
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



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Testing Center-Environmental

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APPENDIX

Report No.:SHE20-11364/1

Customer Reference: -



End of report