CPV TOWANTIC, LLC

DEVELOPMENT AND MANAGEMENT PLAN



SUBMITTED TO CONNECTICUT SITING COUNCIL JULY 17, 2015 (COPY)

Development and Management Plan

- a) A final site plan showing all roads, structures and other improvements on the site. The final site plan shall, where possible, preserve existing vegetation on the site;
- b) A detailed plan for the gas transmission interconnection showing gas metering and compressor station if applicable;
- c) Water and sewer connection routes;
- d) Detailed project schedules for all work activities and proposed construction hours;
- e) Erosion and sedimentation control plans that reflect the complexity of developing the site;
- f) Emergency response/safety plan per Condition No. 1(h) of the Decision;
- g) Final noise mitigation measures and plans to demonstrate compliance with DEEP noise standards;
- h) Final determination on black start capability and such design if applicable;
- i) Stormwater pollution protection plan outlining best management practices;
- j) Final stormwater design including evaluating the feasibility of not introducing stormwater into the wastewater;
- k) Updated Water Supply/Management Plan;
- 1) Decommissioning Plan;
- m) Updated fuel storage and handling plan including containment and other measures to protect against spillage when the ULSD tank is being refilled;
- n) Containment and/or protective measures for the safe delivery and storage of hydrogen and aqueous ammonia;
- o) Maintenance of detention basins;
- p) Backup generator design and containment measures for fuel, oil, and coolant;
- q) Final report on wildlife surveys performed in 2015 and any recommended measures to mitigate wildlife impacts due to construction and/or habitat loss;
- r) Dewatering plan to address groundwater issues during construction;
- s) Final construction traffic route plans;
- t) Fence design and other site security measures;
- u) Federal Aviation Administration lighting design for the stacks; and
- v) Full geotechnical study performed on Lot 9A prior to finalizing construction plans.

* Note: All referenced site plans in the various responses are located in Section 2(e).

2(a)

A FINAL SITE PLAN SHOWING ALL ROADS, STRUCTURES AND OTHER IMPROVEMENTS ON THE SITE. THE FINAL SITE PLAN SHALL, WHERE POSSIBLE, PRESERVE EXISTING VEGETATION ON THE SITE.

DOCKET NO. 192B CPV TOWANTIC, LLC CERTIFICATE OF ENVIRONMENTAL COMPATIBILITY AND PUBLIC NEED DEVELOPMENT AND MANAGEMENT PLAN CONDITION 2.a – FINAL SITE PLAN

In accordance with the Connecticut Siting Council's May 14, 2015 Decision and Order (Docket No. 192B, Item 2.a), CPV Towantic, LLC hereby submits final site plans and descriptions for the CPV Towantic Energy Center's (the "Project") facilities.

Discussed below are the key points considered and evaluated in developing the final site plan:

- Site constraints and considerations.
- Adjusted Project facilities.
- Regulatory compliance.
- Final site plan and elevations.

Site Constraints and Considerations

The Project site is comprised of two (2) contiguous parcels totaling 26 acres, and located in the Town of Oxford's industrial zone, as shown on the attached site location map (C_305 Site Plan). The site is surrounded by industrial zones on all sides and is bordered on the north by the existing Algonquin natural gas pipeline right-of-way (ROW) and on the northwest by the existing Eversource 115-kV electric transmission line ROW. These two utility ROW's are important components of the site, since the respective interconnections to these utilities will be made on the plant site or within the ROW that borders the site. The strategic location of the plant site thus avoids disruption and impact to other properties due to interconnecting utility corridors between the ROW's and the Project site.

The existing Eversource 115-kV transmission line ROW easement, which includes three (3) 115-kV transmission lines, crosses the northwest corner of the site. The Project must interconnect to all three lines in this ROW in order to effectively and appropriately interconnect to the electric grid of New England. This requirement dictates the size and orientation of the Project switchyard.

The most efficient use of the site and surrounding land for the switchyard is to locate it as close as possible to the transmission line ROW, preferably at the point where the ROW crosses the Project boundary. This avoids additional ROW requirements to interconnect to these existing 115-kV lines. As such, the Project layout is oriented with the switchyard located in the northern portion of the site, immediately adjacent to the 115-kV lines that cross the northwest corner of the site. This switchyard location then dictates the orientation of the electric generators (two gas turbines and one steam turbine generator) and their associated step-up transformers in the northern portion of the site. Along with the placement of the generators, the switchyard orientation strongly influenced the arrangement of the steam turbine and administrative/warehouse building.

The location of the Waterbury-Oxford Airport also factored into the placement of the combustion turbine exhaust stacks. Runway 18 at the Waterbury-Oxford Airport, located about 0.6 nautical miles west of the site, enforces a Non-Precision Approach procedure that restricts structure heights on the western portion of our Project site. By electing to place the combustion turbines and associated stacks on the eastern

portion of the site, the FAA has confirmed that the stacks will not be a hazard to this air navigation pattern.

Another constraint that is unique to this Project is the use of an air-cooled condenser for the cooling and condensing of steam that drives the steam turbine generator. The air-cooled condenser minimizes water consumption (a reduction of over 90% percent) as compared to a conventional wet-cooling tower system. The air-cooled condenser requires approximately 70% more space as compared to a conventional wet-cooling tower and requires a very large steam duct interconnection to the steam turbine generator. Thus, the steam turbine generator and the air-cooled condenser are considered as one integral piece in the site arrangement.

The Project site is located on a north-south trending ridgeline that has elevations ranging from approximately 800 feet (southeast, southwest and northwest corners) to 860 feet (north central). To effectively use this ridgeline the Project will cut and fill the ridgeline to achieve a final site grade of 830 feet. This will require a significant amount of cut/fill and grading on the side slopes. However, on the north end of the site the existing grade and natural wooded area will be preserved to the greatest extent possible.

Another factor that affects the placement of facilities on the site is CPV Towantic's effort to remain consistent with the Town of Oxford's Zoning Regulations, which requires a minimum of 40 feet as buffer along all property boundaries. Facilities are prohibited from construction in this buffer area and only filling and grading are allowed. This 40 feet buffer area on the north end of the property will be part of a 0.95 acre wooded area which will be preserved in its existing natural state.

One final consideration with respect to the arrangement of site facilities was the placement of the stormwater detention ponds. Due to changes made in the Connecticut storm water regulations from the time of the original Docket No. 192 Decision and Order (June 23, 1999), the Project needed to incorporate additional stormwater retention on the project site. To facilitate compliance with this change in regulation, Towantic has entered in to an option agreement to purchase Lot 9A, comprised of approximately six (6) acres and located directly south of the original twenty (20) acre site.

Adjusted Site Facilities

The following facilities have been adjusted, see attached final site plan for the Project (M200-1 PLOT PLAN) with reference numbers that correspond to the adjustments below, since the site plan was submitted to the Connecticut Siting Council in CPV Towantic's Petition Reopen and Modify its Certificate of Environmental Compatibility and Public Need (CECPN) due to Changed Conditions on November 3rd, 2014:

- 1. Addition of fuel gas compression necessary to meet the gas turbine pressure requirements based on recent gas supply data provided by Algonquin Interstate Pipeline
- 2. Placement of condensate storage tank underneath the ACC to comply with vendor design
- 3. Placement of the combustion turbine gas heater, filter, and metering skid adjacent to the combustion turbine package to comply with vendor design
- 4. Increased size of the fin fan cooler to comply with vendor design necessary to meet the final facility auxiliary cooling loads

Regulatory Compliance Considerations

The final site plan has been analyzed and evaluated with respect to air quality compliance. This plan and corresponding revised analysis have been submitted to Connecticut Department of Energy and Environmental Protection (CT DEEP) as part of the Project's Air Permit application. A draft permit for the Project is currently being prepared by CT DEEP.

Noise modeling was also completed on the final site plan to demonstrate compliance with all local and state noise standards that limit the Project under normal operating conditions to 51 A-weighted decibels (dBA) at night at the boundaries of residential land use classifications and 70 dBA at all industrial property lines (essentially the Project site boundaries).

Final Site Plan and Elevations

The final site plan for the Project (M200-1 PLOT PLAN) incorporates all the site constraints, adjusted facilities, and regulatory considerations as addressed in the above sections. The final site plan incorporates a final grade elevation of 830 feet AMSL. The final elevations for each major piece of equipment are captured on the attached drawings:

- Drawing M301_D_GA ELEVATION LOOKING EAST
- Drawing M303_A_GA ELEVATION LOOKING WEST
- Drawing M304_B_GA ELEVATION LOOKING NORTH
- Drawing M305_A_GA ELEVATION LOOKING SOUTH



VOL. 332, P. 1093 *14 00 PLANT COORDINATE SYSTEM E 2000.0-N 5000.0 PLANT GRADE=±830.0-CT STATE PLANE SYSTEM E 498,293.1464 N 236,931.5459 EQUIPMENT PAD AREAS: 12" LAYER OF 1-1/2 TO 2" CRUSHED STONE TO GRADE CT DOT SPEC M.01.01 No. 3 $\langle 3 \rangle$ $\langle 24 \rangle$ $\langle 31 \rangle$ 23 (35) 49 (25) (48) **47** $\left< 52 \right>$ (28) (21) $\langle 35 \rangle$ STONE TO GRADE (22) $\langle 27 \rangle$ (17) (9) (54) CONDENSER AREA: 12" LAYER OF 1-1/2 TO 2" CRUSHED STONE TO GRADE CT DOT SPEC M.01.01 No. 3 TURBINE BUILDING $\langle 16 \rangle$ $\langle 8 \rangle$ $\langle 8 \rangle$ FAA CONSTRAINT AREA (29) (7 PERIMETER PLANT ROAD - PAVED CONDENSER & FUEL-STORAGE AREA: PERVIOUS CRUSHED STONE TO GRADE 60 — — Woodruff . _____HILL_____ROAD TOWER 459 CL & P TOWER STR 11165

LOT 9

ALGONQUIN GAS TRANSMISSION, LLC

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2(b)

A DETAILED PLAN FOR THE GAS TRANSMISSION INTERCONNECTION SHOWING GAS METERING AND COMPRESSOR STATION IF APPLICABLE.

DOCKET NO. 192B CPV TOWANTIC, LLC CERTIFICATE OF ENVIRONMENTAL COMPATIBILITY AND PUBLIC NEED DEVELOPMENT AND MANAGEMENT PLAN CONDITION 2.b – FUEL GAS INTERCONNECTION PLANS

In accordance with the Connecticut Siting Council's May 14, 2015 Decision and Order (Docket No. 192B, Item 2.b), CPV Towantic, LLC hereby submits preliminary plans for the fuel gas metering, regulation, and compression station. CPV Towantic anticipates it will construct these facilities based on Spectra's final specifications.

FUEL GAS INTERCONNECTION PLAN

This outline represents a preliminary design for the Project's fuel gas system which includes fuel gas metering, regulation and compression. As the Project moves through final design and into construction, refinements in the design are anticipated to continue. The pressure metering and regulation station and compression area will reside on the Project's site and will be supplied with fuel gas by a lateral off of the Algonquin Gas Transmission Company facilities.

Transmission-pressure gas (390 to 750 psig) will be supplied by a lateral off of the Algonquin Gas Transmission line owned and operated by Spectra Energy. The lateral enters the metering and regulation (M&R) station where gas is first filtered, then metered, heated and regulated. Gas compression facilities are also provided inside the power plant fence line to boost gas pressure in the event that inlet pressure is lower than required for the power plant gas turbines. The M&R station will be designed for a maximum flow rate of 132,000 dekatherms/day (5,400 Mscfh), with a maximum allowable operating pressure (MAOP) of 750 psig.

Gas filtration is provided by a filter separator vessel, which collects any remaining liquid or solid particles greater than 5 microns present in the gas. Gas metering equipment is housed inside a pre-fabricated metal building. Metering facilities will consist of a 12" ultrasonic meter to handle the design gas flow, and a further 2" rotary, orifice or coriolis meter sized to handle low flow metering. A metering flow control valve is also present to curtail flow in the event that the plant exceeds its design flow demand.

An emergency shutdown (ESD) valve with actuator and remote pressure and temperature sensors will be included downstream of metering (and prior to heating & regulation), outside of the building. This valve will close in any fire, gas or overpressure event.

Gas heating will be provided, if needed, to avoid any freezing issues post-regulation. Gas temperature is governed by a temperature control valve on the cooling medium side.

Gas regulation is provided by three separate monitor-regulator and working-regulator runs. The monitorregulator / working-regulator setup of each run provides the required 49 CFR 192 compliance for pressure limiting devices. Two runs are each sized with 6" Becker T-ball style monitor and working regulators. Each of the two runs is sized to handle the full design flow and effectively provide 100% redundancy for pressure regulation. The Becker T-ball valves are installed below grade (outdoors) for increased noise attenuation. The third run is sized with 2" regulators to provide effective gas regulation during low-flow conditions, and improve design-flow pressure response. The third run is installed above-ground and outdoors. The M&R station includes an electronic gas metering building operated by Spectra Energy. This building provides Spectra remote feedback of station pressure, temperature and flow as well as fire and gas alarm signals. Fire and gas sensors will be installed inside all buildings and at suitable points outdoors. A range of pressure, temperature, flow & alarm signals are also delivered to the power plant control system for monitoring and remote operation.

A galvanic cathodic protection (CP) is provided on all lateral and station below grade piping to protect against corrosion. Further, drain legs (accessible from grade) are provided at suitable low points in the event that any liquids collect.

CONCEPTUAL DRAWINGS

The conceptual design for the above-discussed plan is attached hereto as:

• 30068 – CPV Towantic – Rev C Conceptual Set - 060915

METERING & GAS REGULATING PLAN SCALE: 1/8"=1'-0"

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2(c)

WATER AND SEWER CONNECTION ROUTES.

DOCKET NO. 192B CPV TOWANTIC, LLC CERTIFICATE OF ENVIRONMENTAL COMPATIBILITY AND PUBLIC NEED DEVELOPMENT AND MANAGEMENT PLAN CONDITION 2.c – WATER AND SEWER CONNECTION ROUTES

In accordance with the Connecticut Siting Council's May 14, 2015 Decision and Order (Docket No. 192B, Item 2.c), CPV Towantic, LLC hereby submits plan sets and a narrative describing the Project's planned water and sewer connection routes.

WATER AND SEWER CONNECTION ROUTES

When Woodruff Hill Road was constructed by the Town of Oxford, utilities including electric, water, sanitary sewer and a stormwater collection system were installed concurrently with the construction of the road to accommodate Spectra Corporation's development of Lot 9 (east and adjacent to the CPV Towantic site).

The connections for water and sewer have already been stubbed into both the twenty (20) acre parcel and lot 9A, the six (6) acre parcel. Each can be seen on the drawing attached hereto as WHIP_CPVParcels_Water&SewerConnections.PDF.

Detailed design associated with items such as piping, wiring, instrumentation, undergrounds, etc., will not be completed until a notice-to-proceed (NTP) for construction has been issued, as is customary with projects of this type and scope. For that reason, a detailed schematic indicating where water and sewer piping will be routed on site is not yet available and is not expected until approximately 3-6 months post-NTP.

In addition to these connections, CPV Towantic will be providing for the design and construction of a water pump station to be located on Lot 5 of the Woodruff Hill Industrial Park (WHIP) subdivision. The pump station will be required to provide adequate pressure to both the CPV Towantic project and the balance of the lots in WHIP. The pump station can be seen on the drawing attached hereto as WHIP_PumpStationEasementMap.PDF.

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2(d)

DETAILED PROJECT SCHEDULES FOR ALL WORK ACTIVITIES AND PROPOSED CONSTRUCTION HOURS.

DOCKET NO. 192B CPV TOWANTIC, LLC CERTIFICATE OF ENVIRONMENTAL COMPATIBILITY AND PUBLIC NEED DEVELOPMENT AND MANAGEMENT PLAN CONDITION 2.d – PROJECT SCHEDULE AND PROPOSED CONSTRUCTION HOURS

In accordance with the Connecticut Siting Council's May 14, 2015 Decision and Order (Docket No. 192B, Item 2.d), CPV Towantic, LLC hereby provides the following information with regard to a detailed project construction schedule and proposed construction hours.

Project schedule

A preliminary bar chart showing the principal construction tasks and overall schedule for this project is attached hereto as 'CPV Towantic Level 1 Schedule 062415.PDF'. It is noted that the overall schedule for the plant construction is about 30 months. While the actual start date will depend on the date when all final construction permits have been obtained and the project has completed financing, the current plan calls for the first on-site tasks of clearing, grubbing, and grading to begin around January, 2016. This will result in the construction and startup testing being completed by June 1, 2018 and the plant then going into full commercial operation.

It is logical to break the Project down into five broad work activities which are, in chronological order:

- 1. Site civil work;
- 2. Placement of major structural concrete foundations;
- 3. Erection of building structural steel;
- 4. Installation of mechanical and electrical equipment; and
- 5. Commissioning and testing of equipment.

Table 1 shows a summary of the approximate duration of each of these phases of the construction and the approximate number of workers who will be on the site at these times. These numbers are estimates and the duration of these work phases will overlap as tasks associated with later activities can be started before all of the tasks from the previous phase are finished.

СО	NSTRUCTION I	TAB PHASES AND AI	ELE 1 PPROXIMATE V	VORKFORCE S	IZE
	Phase 1	Phase 2	Phase 3	Phase 4	Phase 5
	Site Civil work	Concrete	Erect Buildings	Install	Commissioning
		Foundations		Equipment	and Testing
Duration (months)	5	8	10	15	10
Avg. # of Workers	75	150	350	500	150

The total workforce will peak at approximately 500 workers during the equipment erection and installation phase and will average approximately 250 for the project duration.

Work Hours

The work hours for the Project will vary depending on construction phase, weather and season, but the normal work hours for the Project will be from 6:30am to 5:30pm, Monday to Friday. However, there may be times when specific construction activities, including, but no limited to, concrete placement, receiving/unloading the major equipment and commissioning and testing could require a longer working day. Additionally, weekend work may become necessary at times in order to maintain the critical path schedule.

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1000	EPC Indicative Proposal Provided	0	14-Jan-15		. ♦ EF	PC In	ndicative	Propos	sal F	Provid	ed			-	1										-			
1010	Owner Finalize Power Island Equipment Contract	213	14-Jan-15	12-Nov-15		ļ						🛑 þ	wne	er Fina	lize F	owei	Islan	d Equi	pme	nt Co	ontract							
1001	Owner Review Proposals and Select Short List	25	15-Jan-15	08-Feb-15		Ów	ner Rev	iew Pro	opos	sals¦a	nd Se	elect \$	hort	List	-													
1020	EPC Award, Contract Negotiations	100	09-Feb-15	30-Jun-15			<u> i i </u>		ΕÞ	C Awa	arḋ, C	Contra	ct Ne	gotiat	ions						i							
1030	All Owner Required Permits Obtained	120	19-May-15	05-Nov-15			1	1 1		1		📫 Ali	Ow	nerRe	quire	əd Pe	rmits (Obtain	ed									
1040	Sign EPC Contract	0	01-Jul-15					•	Sig	n EP	C Co	ntract]]		
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1132	Owner Provide Laydown Area	0		13-Nov-15								♦ 0	wne	er Prov	vide L	aydo	wn Are	a										
301009	Civil and Site Engineering	75	16-Nov-15	07-Mar-16											– (Civil a	nd Site	e Engir	neer	ing								
301010	Engineering to Support BOP Procurement	77	16-Nov-15	09-Mar-16											<u> </u>	Engin	ering	to Sup	opor	t BOI	P Proc	urem	ent					
341019	Procure Site Work Subcontract	20	16-Nov-15	15-Dec-15] ₽	rocure	Site	Wor	k Sub	contra	ct									
301020	Engineering to Support Foundation Construction	154	09-Dec-15	19-Jul-16												<u></u>			Eng	ineeri	ingto	Suppo	ort F	ounda	tiọn C	onstr	uctic	วท
341021	Clear and Grub Project Site	50	16-Dec-15	07-Mar-16									Ļ		– (Clear	and G	rub Pr	oje¢	t Site	•							
501500	Procure / Deliver Air Cooled Condenser	240	17-Dec-15	29-Nov-16																		Pr	ocur	e/De	liver A	∖ir Co	oled	Сс
341022	Install Temporary E&SC Measures	100	17-Dec-15	25-May-16					į				Ļ				🔲 Ir	istall T	emp	orary	/ E&S	C Mea	asur	es				
301022	HRSG Foundation Design	70	31-Dec-15	08-Apr-16									ļ		1	🛑 H	RSĠ I	ound	atior	h Des	ign							
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1070	Receive CTG Vendor Design Information (GE)	119	14-Jan-16	30-Jun-16										Ċ				📕 Re	ceiv	ve CT	G Vei	idor E)esiç	n Info	rmatio	on (G	E)	
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1090	GE Owner Definition Meeting (ODM)	0	14-Jan-16											♦ GE	Owr	her D	efinițio	Mee	ting	(ODI	VI)							
500200	Procure / Deliver Electrical Equipment	311	21-Jan-16	13-Apr-17										ģ	1			· ·	1	· ·	1		1	1	<u> </u>	Procu	ure /	De
1060	Receive HRSG Vendor Design Information (GE)	88	28-Jan-16	01-Jun-16										—		<u>; ;</u>	-	Receiv	/e H	RSĠ	Vend	or Des	sign	Inforr	națion	(GE)		
301030	Engineering to Support Electrical Construction	256	28-Jan-16	01-Feb-17										<u> </u>		11			!	· · · · ·				Eng	ineeri	ng to	Supr	oor
301040	Engineering to Support Mechanical Construction	235	28-Jan-16	03-Jan-17										Ļ	;	+ +		; ;				; ;) Er	nginee	ring to	Sup	port	Me
301021	Steam Turbine Foundation Design	90	03-Feb-16	09-Jun-16												: :	<u> </u>	Stean	n Tu	rbine	Foun	dation	De	sign				
1051	Owner Provide Full Site Access	0		12-Feb-16						Ì			Ì	•	Öwi	ner Pi	ovide	Full Si	te A	cces	s							
411000	Procure / Deliver Long Lead Piping	299	26-Feb-16	02-May-17											Ļ	<u> </u>		+ +	_		_					Pro	ocur	e /
509010	Procure / Deliver BOP Mechanical Equipment	245	26-Feb-16	15-Feb-17												! !							;	P	ocure	/ De	liver	BC
1131	Owner Provide Construction Water & Power @ TP	0		29-Feb-16					i				i		• 0	wner	Provid	le Cor	nstru	iction	Wate	r & Po	ower	@ TI				
2010	Full Site Mobilization	0	01-Mar-16												♦ F	ull Site	e Mob	lizatio	n									
341023	Phase 1 Cut and Fill and Select Drainage Features	25	01-Mar-16	07-Apr-16												PI 2	nas¦e 1	Cut a	Ind F	Fill an	d Sele	ct Dr	aina	ge Fe	atures			
341036	Laydown Yard - Clear and Grub	25	08-Mar-16	14-Apr-16					į				Ì			i i	aydov	ın Yar	d - (Clear	and C	irub						
1120	Receive HRSG Certified Foundation Design (GE)	0		10-Mar-16											. ¦ ♦ 	Recei	ve HR	SG C	ertifi	ied Fo	ounda	ion D	esig	n (GE)	¦		
341024	Phase 2 Cut and Fill and Select Drainage Features	20	24-Mar-16	25-Apr-16													Phase	e 2 Cu	t an	d Fill	and S	elect I	Drair	nage l	eatur	es		
1110	Begin Receiving CTG Certified Foundation Design (GE)	0		24-Mar-16						i			÷	i	•	Beg	in Rec	eiving	СТ	G Ce	rtified	Found	datio	n De	ign (C	SE)		
325500	Procure / Deliver Field Erected Tanks	176	31-Mar-16	08-Dec-16																	1	P	rocu	ire / E	eliver	Field	Erec	cte
343500	Procure / Deliver Buildings	160	31-Mar-16	14-Nov-16						1					-						_	Proc	ure	/ Deliv	er Bu	ildings	3	
1130	Receive STG Certified Foundation Design (GE)	0		07-Apr-16	. .					+		- + + .				♦ R	eceive	STG	Cer	tified	Found	lation	Des	ign (C	θE)	; ;;		
341025	Phase 3 Cut and Fill and Select Drainage Features	20	08-Apr-16	09-May-16													J Pha	ise 3 (Cut a	and F	ill and	Selec	t Dr	ainag	e Feat	ures		
341037	Laydown Yard - Cut and Fill	40	15-Apr-16	16-Jun-16											-			Layd	lowr	n Yar	d - Cu	t and	Fill				. !	
341020	Excavate/Backfill Bathtub and Foundations	150	18-Apr-16	29-Nov-16											-							Ex	cava	ate/Ba	CKfill	∃athtu	ıb ar	ıd l
341910	HRSG & Stack Unit 1 & 2 Foundation Construction	88	26-May-16	04-Oct-16																	HRS	G & S	tacl	(Unit	1&2	Foun	datic	n (
341038	Laydown Yard - Install Fabric and Surface	10	17-Jun-16	30-Jun-16		i								-	1			📕 La	ydo	wn Ya	ard - I	nstall	⊦abi	ric an	a Surfa	ace		

Actual Work

Remaining Work

Critical Remaining Work

♦ ♦ Milestone

Summary

CPV Towantic Energy Center Level 1 Schedule Preliminary for Review

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GEMMA POWER SYSTEMS

	Page 2 of 3																														24	l-Jun-	-15
Activity ID	Activity Name	Original	Start	Finish				2015					ELM		2)16	<u> </u>					2017		<u>ет</u>					201	18 1 Juli 7			
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341920	CTG Unit 1 & 2 Foundation Construction	82	29-Jun-16	27-Oct-16	+ +										-		-		CTG Unit 1 &	2 Foun	dation (Constr	uction					-					-
509000	Procure / Deliver Water Treatment Syst	160	01-Jul-16	21-Feb-17																Proc	ure / De	elivęr \	Vater T	۲reatr	ment Sy	yst							
310100	Under Ground Piping Installation	144	28-Jul-16	03-Mar-17													i.	i i	i i i	Und	ler Gro	und Pi	ping Ins	stalla	tion								
330100	Under Ground Electrical Installation	200	28-Jul-16	31-May-17												i 🗖						Unde	r Grou	und E'	lectrica	ıl Insta	Illation						
342000	BOP Foundation Construction	144	05-Aug-16	14-Mar-17													1			📥 вс	DP Fou	ndatio	n Cons	struct	ion								
341930	STG Foundation Construction	145	16-Sep-16	27-Apr-17							++ 		+	++ 	+	++-		<u> </u>	<u></u>		ST	G Fou	ndation	۱ Con	structio	on			() 				
343510	Erect Buildings (Admin, WH, & WT)	185	15-Nov-16	28-Aug-17														j (Erec	t Buildir	ngs (/	۰. dmin, V	VH, &	WT)				
323050	Erect Air Cooled Condenser	263	02-Dec-16	11-Dec-17											i					; ;	i i	<u> </u>	<u>i i</u>		<u>i i</u>	Ere	et Air C	ooled	Condens	ser			
330200	Erect BOP Electrical Equipment	139	02-Dec-16	07-Jul-17																		<u> </u>	Erect B	зорі	Electric	al Éq:	uipment						
310200	Above Ground Piping Installation	245	16-Dec-16	28-Dec-17																i i	i i	i	i i		î î		Above C	Ground	Piping I	nstallati	oh		
325510	Erect Field Tanks (FO, MW/FW,& DW)	140	16-Dec-16	24-Jul-17							++			++	+	++-							Erec	ct Fie	ld Tank	s (FC	, MW/F	W,& C	wW)				
323060	Erect BOP Mechanical Equipment	150	09-Jan-17	25-Aug-17																<u> </u>				Erec	t BOP N	Mech	anical Er	quipme	ent				
1171	CTG First Unit Ancillary Equipment Delivery Site (GE)	60	20-Jan-17	17-Apr-17																	СТĠ	First	Unit An	ncillar	y Équipi	ment	Delivery	/ Site (GE)				
1140	Steam Bypass System Delivery to Site (GE)	0		25-Jan-17															♦ S	Steam B	vpass	System	Delive	ervto	Site (G	SE)							
1150	HRSG Unit 1 Steel Delivery @ Site (GE)	1	02-Feb-17	02-Feb-17															1 1	HRSG I	Jnit 1 S	Steel D	eliverv	@ Si	te (GE))							
323010	Erect HRSG Structural Steel - Unit 1	20	03-Feb-17	07-Mar-17											 					Ere	ct HRS	SG Str	uctural	Stee	I - Unit	1							·
1181	CTG Second Unit Ancillary Eq Delivery Site (GE)	60	20-Feb-17	15-Mav-17																		CTG S	econd l	Unit /	Ancillary	v Ea [eliverv	Site (C	E)				
323040	Erect Water Treatment Systems	88	22-Feb-17	07-Jul-17																			Erect V	Water	r Treatr	ment {	Svstems						
1160	HRSG Unit 2 Steel Delivery @ Site (GE)	1	06-Mar-17	06-Mar-17																I HR	SĠ Uni	it 2 Ste	el Deliv	verv	@ Site ((GÉ)							
1152	HRSG Unit 1 Module Casing and Drum Delivery @ Site (GE	30	06-Mar-17	14-Apr-17																	HRS	G Unit	1 Modu	lule C	asing a	and Dr	um Deli	iverv (∛ Site (G	ε)			
323011	Erect HRSG Structural Steel - Unit 2	20	07-Mar-17	, 06-Apr-17																- +	Erect	HRSG	Struct	tural {	Steel - I	Unit 2							
1191	STG Ancillary Equipment Delivery Site (GE)	60	08-Mar-17	31-May-17																		stg	Ancillar	irv Éa	uibmen	nt Deli	verv Site	e (GE)					
344010	Erect Utility Rack	75	15-Mar-17	07-Jul-17																			Erect	Utility	Rack								
323012	Erect HRSG Modules, Casing and Drums - Unit 1	30	23-Mar-17	05-May-17																	Ē	ectH	RSG M	iodule	s. Casi	ing ar	d Drum	ıs - Un	it 1				
330300	Above Ground Electrical Installation	180	31-Mar-17	28-Dec-17																	77				, eaq.		Above C	Arounc	Electric	al Insta	llation		
1144	DCS Hardware Delivery to Site (GF)	0		31-Mar-17							++			++						· † · · · •	DCSH	ardwa	re Deliv	verví	to Site ((GF)						·	·
1142	CEMS Delivery to Site (GE)	0		04-Apr-17																	CEMS	Delive	rv to Si	site (C	3F)	,							
1162	HRSG Unit 2 Module Casing and Drum Delivery @ Site (GE	30	05-Apr-17	16-May-17																		HRSG	Unit 21	Modu	ile Casi	ing ar	d Drum	Delive	rv @ Sit	te (GF)			
323020	Receive Compustion Turbine at Site - Unit 1	0	17-Apr-17																		Rece	eive C	ombust	tion T	urbine	at Site	- Unit 1	1					
323021	Receive Compustion Turbine Generator at Site - Unit 1	0	17-Apr-17																		Rece	eive C	ombust	tion T	urbine	Gene	rator at	Site -	Unit 1				
323022	Set Combustion Turbine and Generator - Unit 1	20	17-Apr-17	16-May-17										+	+							Set Co	mbustic	on Ti	urbine a	and G	enerator	r - Unit	1		·	·	
323013	Frect HRSG Piping, Seam Welding, Stacks - Unit 1	130	24-Apr-17	01-Nov-17																					Fre	ect H	RSG Pir	oina. S	eam We	lding. S	tacks	-Unhit	1
323014	Frect HRSG Modules, Casing and Drums - Unit 2	30	24-Apr-17	07lun-17																		Ere	t HRS	G Mc		Casir	in and F)rums	- Unit 2	, e.			
323023	Assemble Combustion Turbine and Generator - Unit 1	110	02-May-17	11-Oct-17																		1			Ásser	mble	Combus	tion Tr	irbine ar	d Genr	erator -	- Unit	1
323024	Receive Combustion Turbine Generator at Site - Unit 2	0	15-May-17	in out in																	•	Receiv	e Comh	bustic	n'Turb	vine G	enerato	r at Sit	e - Unit :	2	jucor		
323025	Receive Compustion Turbine at Site - Unit 2	0	16-May-17																			Receiv	e Com	busti	on Turb	nine a'	Site - I	Init 2					
323026	Set Combustion Turbine and Generator - Unit 2	25	16-May-17	22lun-17																			et Com	vousti	on Turb	bine a	nd Genr	erator	- Unit 2				
323019	Frect HRSG Piping, Seam Welding, Stacks - Unit 2	130	23-May-17	01-Dec-17																						Fre	HRSC	- Pinin	d Seam	Weldin	n Star	rks'-	LInit
1190	ST L P Hood Delivery @ Site Adjacent to End (GE)	0	20 May 17	31-May-17																		sti	PHood	d Deli	verv Ø	Site	Adiacen	t to Fr	d (GE)		g, otac		
323030	Frect STG	160	01- Jun-17	25-Jan-18																		012	1 1000			Unio /	Frec	t STC					
323029	Assemble Combustion Turbine and Generator - Unit 2	98	08lun-17	30-Oct-17												÷										semb	e Comh	ustion	Turbine	and Gr	nerato	or - U	nit 2
1192	I P Rotor HP/IP Steam Turb & Gen Delivery @ Site Adjacer	0		13-Jun-17																		▲ Ì P	Rotor	нв/ш	P Stean	n Turł	v & Gen	Delivo	-nv @ Sit	e Adiac	ent to	Fnd (
1201	Owner Provide Operators	0		03-Jul-17																			Jwner	Prov		erator			iy e ola			- nq (
1210	Owner Provide Back Feed Power	0		01-Aug-17																				vner F		Back	Feed P	ower					
1202	Owner Provide First Fills	0		08-Aug-17											-									wnbr	Provide	e Fire	t Fille	540					
1202	Gwiler i fovide i listi liis	0		00-Aug-17	<u> </u>										1		1	<u> </u>					• •	WIICI	TIOVIQ	51115			<u> </u>	<u> </u>			
Ac Re Cri ♦ ♦ Mil V Su				CPV	/ Tow Le Prelir	vant vel ⁻ nina	ic Er 1 Scl ary fo	nergy hedu or Re	y Ce ule eviev	nter v											G	em	ma										
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Activity ID	Activity Name	Original	Start	Finish		· ·				2015					_					20)16					\square					201	17	
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1146	DCS Software Delivery to Site (GE)	0		11-Aug-17					·			-						<u> </u>			Ļ	ļ				<u> </u>		1.0	<u> </u>	<u> </u>			
1148	HRSG Catalysts Delivery to Site (GE)	0		15-Sep-17															-		· ·												
2020	Hydro HRSG Unit 1	0		19-Sep-17																													
1200	Owner Provide Fuel Gas	0		21-Sep-17															-		· · ·												
2030	Hydro HRSG Unit 2	0		03-Oct-17																													
710010	Cold Commissioning	92	06-Oct-17	26-Jan-18		· i ·								;;		j-			- i			11	ii- 							ii			
341110	Site Paving & Final Grading	66	12-Oct-17	22-Jan-18															-														
710015	Perform Loop Checks	85	12-Oct-17	24-Jan-18															-														
710020	STG Lube Oil Flush & Restore	13	04-Nov-17	18-Nov-17														÷													i		
711030	Clean HRSG, Hydrolyze, & Air Blows	50	22-Nov-17	24-Jan-18																	· ·												
710180	Mechanically Clean ACC	22	12-Dec-17	09-Jan-18																									1	1			
710030	STG on Turning Gear	0	18-Dec-17																-														
2040	First Fire CTG Unit 1	0	27-Jan-18																		· · ·												
711020	Hot Commissioning	107	27-Jan-18	31-May-18							Ì				i									i							i		
2050	First Fire CTG Unit 2	0	03-Feb-18																-		· · ·							-					
711035	CT Full Load Test	1	13-Feb-18	13-Feb-18			1															1							1]			
711040	Run CTG's for Water Quality	14	23-Feb-18	10-Mar-18															-														
711050	Steam Turbine First Roll	0	12-Mar-18																		· ·												
1194	Owner Supplied Equipment Commissioning Period	60	12-Mar-18	10-May-18							i							į						i							i		
711060	Install HRSG Catalyst and Pull ST Screens	15	12-Mar-18	28-Mar-18															-		· · ·												
710185	Pull Vacuum and Clean ACC Units	15	29-Mar-18	14-Apr-18																	!]							1				
711070	Perform Hot Start Demo	1	16-Apr-18	16-Apr-18														÷	i.			1		i							i		
711080	RATA and Drift Tests	7	17-Apr-18	24-Apr-18															-		· ·												
711082	Combustion Turbine Emissions Testing	3	25-Apr-18	27-Apr-18					į		į.							Ì	į.					į							i		
711084	Cold Start Demonstration	1	28-Apr-18	28-Apr-18																	· ·												
711086	BOP Tuning	15	30-Apr-18	16-May-18																	;								11]			
711090	Performance Testing & Tuning	14	17-May-18	01-Jun-18																													
2060	Substantial Completion	0		01-Jun-18*															-		· · ·												
711087	Fuel Oil Comissioning	30	01-Jun-18	05-Jul-18																											i		
2070	Final Completion	0		31-Aug-18																	1 1 1 1												

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	Critical Remainin
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Critical Remaining Work
 Milestone
 Summary

CPV Towantic Energy Center Level 1 Schedule Preliminary for Review





2(e)

EROSION AND SEDIMENTATION CONTROL PLANS THAT REFLECT THE COMPLEXITY OF DEVELOPING THE SITE.

DOCKET NO. 192B CPV TOWANTIC, LLC CERTIFICATE OF ENVIRONMENTAL COMPATIBILITY AND PUBLIC NEED DEVELOPMENT AND MANAGEMENT PLAN CONDITION 2.e – EROSION AND SEDIMENT CONTROL PLANS

In accordance with the Connecticut Siting Council's May 14, 2015 Decision and Order (Docket No. 192B, Item 2.e), CPV Towantic, LLC hereby provides the following detailed narrative and set of plans regarding erosion and sediment control in the attached drawings.

Attached

• Drawings C315-C317 & C330-C331 in '98132 D&M Plans 6-30-15.PDF'

2(f)

EMERGENCY RESPONSE/SAFETY PLAN PER CONDITION NO. 1(h) OF THE DECISION.

DOCKET NO. 192B CPV TOWANTIC, LLC CERTIFICATE OF ENVIRONMENTAL COMPATIBILITY AND PUBLIC NEED DEVELOPMENT AND MANAGEMENT PLAN CONDITION 2.f –EMERGENCY RESPONSE/SAFETY PLAN

In accordance with the Connecticut Siting Council's May 14, 2015 Decision and Order (Docket No. 192B, Item 2.f), CPV Towantic, LLC hereby provides the attached Draft Emergency Response Plan and relevant correspondence.

Attached:

- 'Condition 2.f ERP Draft for D&M Plan.docx'
- 'DESPP EmailConfirm.PDF'
- 'OxfordEmgcyOps EmailConfirm.PDF'

2(f)

*SEE ATTACHED PDF DOCUMENT FOR COPY OF THE DRAFT EMERGENCY RESPONSE PLAN.

Kyle Kekeisen

From:	Bergeron, Brenda <brenda.bergeron@ct.gov></brenda.bergeron@ct.gov>
Sent:	Friday, June 05, 2015 5:46 PM
То:	'DeRosa, Franca L.'; Small, Philip M.; Andy Bazinet; Paszczuk, Henry
Cc:	Vannini, Thomas; Devico, Scott
Subject:	RE: CPV Towantic - Proposed Electric Generating Facility - Emergency Response/Safety
	Plan
Attachments:	ESF 12 All Hazards Energy and Utilities Annex Final Version 1.0 August 21 2013.docx

Good afternoon, it was a pleasure meeting with you all today. As we discussed, the best emergency plan is one that is created through a collaborative effort with appropriate partners, and therefore the next step that you are taking, to meet with state and local officials and private sector representatives, is entirely appropriate. I have included the website for our division, <u>www.ct.gov/demhs</u>, so that you can view a number of documents, including the State Response Framework. I have also attached for your review the ESF-12 Energy Annex, which includes the Make Safe Protocol, beginning on page 34. Also as we discussed, the team at the plant should be trained in the National Incident Management System (NIMS), Incident Command System (ICS). The basic courses are on line, 100, 200, 700, and 800. Throughout the year, ICS 300 and 400 are taught at locations across the state. For more information on NIMS, you can go to <u>www.training.FEMA.gov</u>.

We look forward to working with you. Brenda

Brenda M. Bergeron, Esq. Division of Emergency Management and Homeland Security Department of Emergency Services and Public Protection

Scott—Here is the draft ERP as it will be submitted in the D&M Plan. As a reminder, the D&M Plan only calls for a draft ERP to be submitted. The document will not be finalized in the Operations Plan phase until after incorporating any comments/edits from you (and any other relevant emergency ops groups/personnel) to Draft ERP we plan to submit this week.

For ease of tracking, I've left changes we've incorporated since our meeting in "tracked changes".

Regards,

Kyle

Kyle Kekeisen Competitive Power Ventures, Inc. 50 Braintree Hill Office Park, Suite 300 Braintree, MA 02184 Office: (781) 952-5972 Cell: (617) 955-7780 Fax: (781) 848-5804

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From: Scott Pelletier [mailto:chiefsjp@oxford-ct.gov]
Sent: Wednesday, July 08, 2015 12:21 PM
To: Kyle Kekeisen
Subject: Re: Towantic D&M plan filing to CSC, including Emerg Resp Plan

Kyle

Please make sure you sand a cpy to me for review and to make comments on it.

we are looking to see if the items and concerns that we discussed at our meeting were incorporated or thought about.

Thanks

Scott J. Pelletier Fire Chief ~ Fire Marshal Town of Oxford

On Wed, Jul 8, 2015 at 11:59 AM, Kyle Kekeisen <<u>kkekeisen@cpv.com</u>> wrote: Scott– We're getting ready to submit our D&M plan (which, as we discussed, includes a draft of our ERP) and I was hoping you'd be kind enough to send an email to me confirming that we met on June 16, 2015 at the Oxford fire house. Nothing special, just something we can put in the file to demonstrate we've done as the CSC has asked (i.e. met with you and others from Oxford Emergency Ops to solicit ERP comments/thoughts). Separately, we've pulled together the draft ERP and are currently circulating it internally for QA/QC. I'll make sure to forward the polished draft of the plan as soon as it's ready to go, likely before the end of this week. We value your input and appreciate your help in making sure that everyone stays safe.

Regards,

Kyle

Kyle Kekeisen Competitive Power Ventures, Inc. 50 Braintree Hill Office Park, Suite 300

Braintree, MA 02184 Office: (781) 952-5972 Cell: (617) 955-7780 Fax: (781) 848-5804

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2(g)

FINAL NOISE MITIGATION MEASURES AND PLANS TO DEMONSTRATE COMPLIANCE WITH DEEP STANDARDS.

DOCKET NO. 192B CPV TOWANTIC, LLC CERTIFICATE OF ENVIRONMENTAL COMPATIBILITY AND PUBLIC NEED DEVELOPMENT AND MANAGEMENT PLAN CONDITION 2.g –NOISE MITIGATON MEASURES AND COMPLIANCE

In accordance with the Connecticut Siting Council's May 14, 2015 Decision and Order (Docket No. 192B, Item 2.g), CPV Towantic, LLC hereby provides the following information with regard to construction and final noise mitigation measures and plans to demonstrate compliance with the Connecticut Department of Energy and Environmental Protection (DEEP) noise standards.

Construction Noise

Since construction equipment operates intermittently, and the types of activities and equipment in use at the site will change with the phase of the Project, noise emitted during construction will be highly variable. However, the project will endeavor to minimize noise impacts by through the use of the following measures:

- Limiting use of major excavating and earth moving equipment to daytime hours;
- Limiting the occurrence of specific short duration loud noise events to daytime hours;
- Providing notification and warning to local inhabitants and emergency services personnel prior to conducting specific loud noise activities, with such notification to include identification of the nature and duration of the noise event;
- Limiting possible evening shift work to low noise activities;
- Ensuring that all equipment is properly equipped with sound mitigation devices, and that such devices are maintained in good working order; and
- Minimizing the queuing of trucks making equipment deliveries and prohibiting queued trucks from idling their engines overnight or during the day to the extent required by law.

Project Noise Design Target

As outlined in the noise study attached to CPV's petition, noise modeling was completed to demonstrate compliance with DEEP noise standards that limit the Project under normal operating conditions to 51 A-weighted decibels (dBA) at night at the boundaries of residential land use classifications and 70 dBA at all industrial property lines (essentially the Project site boundaries).

Mitigation Design

The Project will employ mitigation of noise emissions from various Project sources in order to meet its noise commitments. Details are provided with regard to key mitigation specifications reflected in the current Project design. As the Project moves through final design and into construction, refinements in the design are anticipated to continue. However, the Engineering, Procurement and Construction (EPC) contract will include guaranteed levels of performance that comply with the above design target and will specify the following measures as the core mitigation package. In this iteration of the design, the mitigation has been adjusted from the noise study to reflect noise compliance with the incorporation of gas compression.

Table 1 provides the required sound power level of each continuous noise source by octave band center frequency (OBCF). The levels specified in that table include specific measures that have been incorporated for certain key mitigation targets, as outlined below:

• Combustion turbines and generators – housed in acoustical enclosures equipped with silencers and attenuators to reduce noise emissions from ventilation openings, fans and make-up air units;

- Combustion turbine air inlets additional silencing beyond standard manufacturer specifications;
- Air cooled condenser (ACC) sound louvered baffles, slower fan speeds or other adjustment to reduce sound levels below standard manufacturer specifications, as well as highly efficient control valves and dump elements with low noise design for the main duct and header;
- GSU transformers low-noise NEMA rated transformers or a 25-foot tall acoustical barrier wall immediately adjacent to the north of the transformers;
- Stacks incorporation of stack silencing inclusive of the heat recovery steam generator (HRSG) to achieve a total 90-degree directional sound power level of 104 dBA to reduce sound pressure levels leaving the flue in the stack structure;
- Auxiliary fin fan cooler low-noise specifications to eliminate the need for an L-shaped barrier previously included in the noise modeling;
- Pumps, heaters, and coolers low-noise equipment, as required, is specified for various pumps, heaters, and coolers that will not be in enclosures or mitigated by use of acoustical barriers;
- Turbine compartment ventilation fans additional attenuators/silencing for the side of the combustion turbine compartment enclosure facing the direction of the closest property line;
- Fuel gas/steam piping and valves incorporation of lagging, with safety and release valve equipped with silencing to the extent permitted by the American Society for Mechanical Engineers code;
- Steam system vents installation of silencers;
- Combustion turbine generator exhaust diffuser incorporation of acoustical lagging as the diffuser exits the turbine compartment and enters the HRSG; and
- Ductwork between the steam turbine generator and the ACC incorporation of lagging and high efficiency control valves.

Table 1 – Facility	Sound	Source 1	Levels for	r Major	Project	Components

Sound Source	Type ¹	Sound Power Level (L _P) by Octave Band Frequency dBL									Broadband Level				
		31.5	63	125	250	500	1k	2k	4k	8k	dBA				
CT Air Inlet Face w/ Silencer	L _W	111	114	114	99	92	93	96	89	77	102				
CT Air Inlet Plenum	L _W	102	96	93	90	92	97	97	94	83	102				
Boiler Feedwater Pumps ²	L _W	95	99	100	90	94	92	89	83	78	97				
Combustion Turbine ²	L _W	108	106	103	99	100	101	104	107	95	111				
CT Load Compartment ²	L _W	96	101	99	91	94	99	98	93	83	103				
CT Generator ²	L _W	101	120	113	103	102	97	93	90	79	104				
Steam Turbine ²	L _W	112	112	108	107	106	101	96	94	93	107				
ST Generator ²	L _W	106	106	105	102	104	103	102	97	88	108				
Turbine Compartment Vent Fans	L _w	95	95	103	94	91	88	87	91	88	97				
Fuel Gas Piping	L _W	104	100	89	81	80	86	88	91	89	96				
HRSG Body and Inlet	L _W	115	119	118	108	94	92	85	68	51	105				
HRSG Accessories Package	L _W	106	110	109	103	94	90	78	69	62	99				
Stack Exit (90 deg. directivity)	L _W	111	118	117	108	93	90	75	66	59	104				
Air-Cooled Condenser	L _P	62	64	58	51	49	48	41	33	14	52				
Auxiliary Fin Fan Cooler	L _W	100	103	101	100	100	98	97	95	93	103				
Condenser	L _W	100	101	100	98	99	93	88	83	79	107				
Main Step-up Transformer	L _W	103	102	106	99	103	94	90	85	78	102				
Auxiliary Transformer	L _W	90	96	98	93	93	87	82	77	70	93				
Fuel Oil Pump ²	L _W	88	91	90	78	80	77	70	67	65	84				
Fuel Gas Metering Station	L _W	96	85	82	75	82	83	93	90	88	97				
Fuel Gas Heater	L _W	84	88	93	85	94	97	98	101	91	105				
Auxiliary Steam Boiler	L _W	101	101	100	98	95	92	89	86	83	98				
ST Bldg (all interior sources)	L _{i(c)}	89	87	94	84	81	80	75	65	56	85				
Control /Auxiliary Boiler Building (all interior sources)	L _{i(c)}	81	82	81	79	80	74	69	64	60	80				
CT Lube Oil Module ²	L _W	102	105	101	100	99	97	97	95	87	103				
Gas Compressor Skid	L _W	110	105	106	102	100	92	86	94	96	102				
Ammonia Injection Skid	L _W	110	105	106	102	100	92	86	94	96	102				
Auxillary Cooling Pump	L_{W}	101	101	100	102	105	102	105	97	94	101				

 1 = "L_w" is the sound power level in dBL, and dBA broadband, (re: 1 pW). "Li(c)" is the calculated average interior sound pressure in dB, and dBA broadband, (re: 20µPa), within a building or structure, based on the sound power levels of noise sources located within that building or structure. L_P is the sound pressure level from the ACC at a reference distance of 400 feet. 2 = Sound levels presented are for equipment housed in acoustical package enclosures.

Confirmation of Design Compliance

Additional modeling has been completed to confirm that the mitigation measures reflected herein continue to comply with the DEEP noise standards (that have also been adopted by the Town of Oxford) that comprise the Project's design target. Results of the analysis are presented in Figure 2. With the mitigation elements described (or their equivalent) the Project will have the ability to fully comply with the noise design target.

Compliance Assessment

As noted above, refinements in specific pieces of equipment will be phased and will overlap with the construction process. As each final selection is made, the specifications noted above will be adhered to or equivalent reductions will be provided in other contributing equipment to result in the overall Project sound levels continuing to comply with the design target. Throughout the final design process, the EPC contractor may conduct its own sensitivity analyses to ensure its ability to meet noise guarantee levels.

Once construction is completed and prior to release of the EPC contractor from its obligation to conform with noise performance guarantees, a compliance test will be undertaken to verify that the anticipated levels of design have been met and that resulting Project contributions are consistent with DEEP and local standards. The contractor shall conduct noise testing in accordance with the reference test methods for measurement of near field and far field sound pressure levels in accordance with ASME PTC 36, Measurement of Industrial Sound.

Measurements will be completed at several Project property line locations and other locations as deemed necessary to confirm that the acoustic performance of the Project meets the most stringent required DEEP and local standards, summarized in Table 2. As an industrial source (Class C under the regulations), the Project is obligated to meet certain daytime and nighttime limits at receiving land use types categorized as industrial, commercial/retail and residential/sensitive areas. For the purpose of compliance, the DEEP noise limits shall be demonstrated by achieving a no more than 70 dBA Project sound level at the Project property boundary (the closest industrial location) and a no more than 51 dBA Project sound level (the most stringent residential nighttime limit) at the three key residentially zoned areas.

		Re	ceptor (dBA)					
Emitter	Class C	Class B	Class A Daytime (7:00 am – 10:00 pm)	Class A Nighttime (10:00 pm – 7:00 am)				
Class C - Industrial	70	66	61	51				
Class B - Commercial and Retail Trade	62	62	55	45				
Class A – Residential Areas and other sensitive areas	62	55	55	45				

Table	2. DEEP	Noise	Limits
-------	---------	-------	--------

The Owner will prepare and submit an Operational Noise Measurement Protocol plan for the Facility 120 days prior to the commencement of the field program. The noise monitoring program test report shall be submitted to the Connecticut Siting Council and include a comparison of specified and measured sound levels together with a statement of compliance.



Legend

Sound Monitoring Locations
Project Area Oxford Zoning
I: Industrial District
R-A: Residential A
R-CGD: Residential Community Golf District

Middlebury Zoning

R: Residential District Sound Level Contour (dBA) 45 dBA 50 dBA 55 dBA 60 dBA 65 dBA 70 dBA DEEP and Oxford 70 dBA Industrial Noise Limit Isopleth

 DEEP and Oxford 51 dBA
 Residential Nighttime Noise Limit Isopleth

Figure 2 Received Sound Levels: Normal Operation

Towantic Energy Center New Haven County, Connecticut

R:\Projects_2014\Towantic\maps\Figure_2_Sound_Levels_Normal_Operation.mxd

2(h)

FINAL DETERMINATION ON BLACK START CAPABILITY AND SUCH DESIGN IF APPLICABLE.

DOCKET NO. 192B CPV TOWANTIC, LLC CERTIFICATE OF ENVIRONMENTAL COMPATIBILITY AND PUBLIC NEED DEVELOPMENT AND MANAGEMENT PLAN CONDITION 2.h – FINAL BLACKSTART DETERMINATION

In accordance with the Connecticut Siting Council's May 14, 2015 Decision and Order (Docket No. 192B, Item 2.h), CPV Towantic, LLC hereby provides the following information with regard to the potential incorporation of blackstart capability into the CPV Towantic Energy Center.

CPV Towantic has made the final determination to not incorporate black start capability into the Project. As discussed in "2f – Connecticut Siting Council Late-Filed Exhibit" dated January 22, 2015, CPV Towantic's ability to retrofit the Facility with blackstart capability (or to incorporate it at this late stage in the Facility's development cycle) would be contingent upon "(i) technical feasibility, (ii) obtaining ISO-NE and FERC approval of a CPV Towantic-specific compensation mechanism and (iii) successful incorporation of the new emissions source into CPV Towantic's Connecticut DEEP air permit."

Prior to submitting an application to ISO-NE for the Facility's consideration as a blackstart resource, CPV Towantic conducted an evaluation of the above-mentioned contingent factors and found the inclusion of blackstart to be both technically infeasible and likely to have a materially adverse effect on CPV Towantic's ability to secure a Connecticut DEEP air permit.

Technical Infeasibility

The technical infeasibility of adding blackstart to the Facility derives primarily from the spatial constraints inherent to the Facility's 26-acre site. Given that the site is bordered on the west and south by roadways, on the north by the Algonquin Interstate Natural Gas Pipeline, on the northwest by the Eversource Energy transmission right-of-way, and on the west by Spectra's gas compression station, there is no further opportunity to expand the site beyond the 26 acres currently contemplated. Without the room to expand, the current site plan could not to accommodate the 16 MW of diesel generators (likely 4 x 4 MW or 2 x 8 MW) required for blackstart capability. Elements of the Facility such as its air-cooled condenser occupy significant portions of the site, but cannot be replaced with smaller equipment such as wet-cooling towers due to the order-of-magnitude increase in expected water usage.

Inability to Incorporate into Air Permit

The incompatibility of blackstart with CPV Towantic's air permitting effort is two-fold. The first issue arises from the schedule associated with a material modification of the Facility's air permit application at this late stage of CT DEEP's review. A modification, such as the inclusion of 16 MW of diesel-fueled blackstart generators, would require a new application for the new emissions sources, thus delaying final approval of the Facility's air permit by at least 6 months. Such a delay would greatly reduce the Facility's probability of achieving commercial operations prior to the June 1, 2018 deadline imposed by ISO-NE. The second issue derives from the increase in Facility-wide potential-to-emit associated with adding the blackstart generators to the project scope. Currently, the Facility's position with respect to certain criteria pollutant potential-to-emit thresholds could not accommodate additional emissions without crossing those thresholds. In doing so, the Facility would reduce the likelihood of securing a viable CT DEEP Air Permit and would substantially increase the permit timeframe.

As a result of the above-mentioned factors, CPV Towantic has determined that it is not reasonable to further pursue the inclusion of blackstart capability in the Facility at this point in time.

2(i)

STORMWATER POLLUTION PROTECTION PLAN OUTLINING BEST MANAGEMENT PRACTICES.

DOCKET NO. 192B CPV TOWANTIC, LLC CERTIFICATE OF ENVIRONMENTAL COMPATIBILITY AND PUBLIC NEED DEVELOPMENT AND MANAGEMENT PLAN CONDITION 2.i – STORMWATER POLLUTION PROTECTION PLAN

In accordance with the Connecticut Siting Council's May 14, 2015 Decision and Order (Docket No. 192B, Item 2.i), CPV Towantic, LLC hereby provides the following Stormwater Pollution Protection Plan (SWPPP).

Attached

• SWPPP as '98132 SPCP & DEEP CGP-Civil1-6-30-2015(1).PDF'

2(i)

*SEE ATTACHED PDF DOCUMENT FOR COPY OF THE STORMWATER POLLUTION PROTECTION PLAN.

2(j)

FINAL STORMWATER DESIGN INCLUDING EVALUATING THE FEASIBILITY OF NOT INTRODUCING STORMWATER INTO THE WASTEWATER.

DOCKET NO. 192B CPV TOWANTIC, LLC CERTIFICATE OF ENVIRONMENTAL COMPATIBILITY AND PUBLIC NEED DEVELOPMENT AND MANAGEMENT PLAN CONDITION 2.j – FINAL STORMWATER DESIGN

In accordance with the Connecticut Siting Council's May 14, 2015 Decision and Order (Docket No. 192B, Item 2.j), CPV Towantic, LLC hereby provides the following narrative and set of plans regarding final stormwater design.

Introduction of Stormwater into Wastewater Management System

After incorporating feedback from the Naugatuck Water Pollution Control Authority, the current stormwater design does not call for the disposal of any stormwater via sanitary sewer. Any water collected in the transformer pit and/or oil tank containment areas will pass through an oil/water separator where it will be visually inspected per CT DEEP guidelines prior to discharge via the Project's normal stormwater management system.

Attached

• Drawings C310, C320-322 & C325 in '98132 D&M Plans 6-30-15.PDF'

2(k)

UPDATED WATER SUPPLY/MANAGEMENT PLAN.

DOCKET NO. 192B CPV TOWANTIC, LLC CERTIFICATE OF ENVIRONMENTAL COMPATIBILITY AND PUBLIC NEED DEVELOPMENT AND MANAGEMENT PLAN CONDITION 2.k – WATER SUPPLY / MANAGEMENT PLAN

In accordance with the Connecticut Siting Council's May 20, 2015 Decision and Order (Docket No. 192B, Item 2.k), CPV Towantic, LLC hereby provides the following information with regard to the Facility's water supply and management plan.

Water Supply

The Facility's expected peak water needs are unchanged from the figures described by CPV Towantic during the Application Phase. Specifically, the summer (mid-April to mid-October) peak daily water requirement of approximately 150,000 gpd is primarily driven by demineralized makeup water used in the evaporative coolers to improve Facility performance on hot days, while the winter (mid-October to mid-April) peak daily water of requirement is driven by the need to inject demineralized water into the combustion turbines along with fuel oil in order to meet NO_x emissions standards. Water balances under various operating conditions at a number of ambient conditions are attached hereto as Exhibit K-1.

To meet these requirements, the Project Water Supply Plan consists of the following provisions:

1. On-site storage of Demineralized Water

The Project's on-site demineralized water treatment system consists of two 196 gpm capacity demineralized water trains in the form of portable treatment trailers. When operated continuously, each trailer will be capable of producing in excess of 280,000 gpd. Practically, the production of demineralized water will be only limited by the quantity of water made available by Heritage Village Water Company, which has currently committed to providing up to 218,000 gpd to CPV Towantic. The 218,000 gpd will be supplemented by 2 on-site demineralized water storage tanks totaling 1,750,000 gallons in the event of oil-fired operation. This water storage buffer will allow the Facility to conduct approximately 52 consecutive hours of oil-fired operation.

2. Redundant Demineralized Water Production Equipment

Portable demineralized equipment will be obtained from Evoqua or another similar vendor. Evoqua provides self-contained demineralization and filtration equipment mounted in an 8-foot by 48-foot trailer that includes all ancillary supplies, piping and utility connections. The MT 5000 model marketed by Evoqua will be sufficient to individually meet the Facility's demineralized water production requirement. The trailer is trucked to the site, connected to the water system and remains in place until the demineralizer agent requires regeneration. A new trailer is brought to the site to replace the depleted unit, which is returned to Evoqua's site for regeneration. Based on the anticipated water quality characteristics of the water delivered by HVWC, the trailer units will be replaced, on average, approximately every 8 days.

3. Water Supply from Heritage Village Water Company

All of the Facility's potable and process water requirements during normal operation will be provided by Heritage Village Water Company. HVWC has committed to sell CPV Towantic up to 150,000 gpd in the summer and 218,000 gpd in the winter. During emergency conditions that would call for CPV Towantic to operate for longer than 52 consecutive hours, the total plant water requirement would need to be met by incoming supply flow. At such times, and to the extent that the HVWC system has some uncommitted water supply capacity available, HVWC would supply the additional water needed. In the event that HVWC is unable to supply the Facility with water above its stated commitment, the Facility will be forced to shut down after 52 consecutive hours of oil-fired operation.

Water Management

In an effort to reduce facility-wide water use, CPV Towantic has incorporated a number of design improvements that result in a drastic reduction of water use intensity, as compared to a typical combined cycle facility, such as:

- Replacing wet cooling towers with an air-cooled condenser;
- Replacing wet-surface air coolers with glycol fin-fan coolers;
- Eliminating blowdown waste streams by making up to evaporative coolers and boilers with demineralized water; and
- Low flow toilets and domestic fixtures.

In aggregate, these 4 improvements result in a greater than 90% reduction in average water usage. In an effort to ensure that CPV Towantic remains among the most water-efficient facilities of its kind, CPV Towantic will periodically review its water usage profile in an effort to capture the benefit of any advances in technology, best practices, etc.

Stakeholder outreach

In addition to the above-mentioned efforts, CPV Towantic commits to proactively engaging with key local water-related stakeholders, with such outreach to include:

- 1. Communication and coordination with HVWC during water restriction and/or drought periods to align the Project's water use profile with the ability of HVWC's supply sources to meet the Project's needs;
- 2. Continued coordination efforts to facilitate the introduction of new water supply sources to HVWC's system, with a particular focus on "out-of-basin" sources; and
- 3. Communication and coordination with the Pomperaug River Watershed Coalition to facilitate understanding of the dynamic natures of the Project's water demands.





WATER BALANCE AND SERVICE WATER ION BALANCE TOWANTIC ENERGY CENTER - OXFORD, CT



PREPARED BY: C. CROSMAN JUNE 19, 2015

CORRESP	ONDING HEAT BALANCE CASE	3	9	1	10		6	11	2	8
FUEL	NG	DO	NG	DO		NG	DO	NG	NG	
NET EQUI	PMENT POWER, MW	820.84	764.19	798.74	726.28		786.23	714.24	763.72	721.83
AMBIENT	TEMPERATURE, °F	20.0	20.0	50.0	50.0		59.0	59.0	90.0	90.0
RELATIVE	HUMIDITY, %	60	60	60	60		60	60	60	60
NUMBER	OF OPERATING GAS TURBINES/ HRSGs	2	2	2	2		2	2	2	2
EVAPORA	TIVE COOLERS	OFF	OFF	OFF	OFF		OFF	OFF	ON	ON
DUCT FIR	NG	OFF	OFF	OFF	OFF		OFF	OFF	ON	OFF
NUMBER	DESCRIPTION			AVERAGE	LOW RATE	- G	ALLONS PE	ER MINUTE		
1	MUNICIPAL WATER SUPPLY	16.1	151.4	16.1	151.4		15.9	151.4	56.6	54.4
2	STORMWATER COLLECTED IN CONTAINED AREAS	1.5	1.5	1.5	1.5		1.5	1.5	1.5	1.5
3	TOTAL EVAPORATION LOSSES	13.1	697	13.0	702		12.9	686	53.6	51.3
4	COMBUSTION TURBINE WASH WASTEWATER - TRUCKED OFF SITE	0.02	0.02	0.02	0.02		0.02	0.02	0.02	0.02
5	DISCHARGE TO TOWN OF OXFORD SEWER	3.0	3.0	3.0	3.0		3.0	3.0	3.0	3.0
6	DISCHARGE TO STORM WATER POND	1.5	1.5	1.5	1.5		1.5	1.5	1.5	1.5
										-
7	BLOWDOWN FROM TWO (2) HRSGs RECYCLED TO THE SERVICE WATER TANK	13.1	12.1	13.0	11.9		12.9	11.8	14.8	12.5
8	EVAPORATIVE LOSSES FROM HRSG/ STEAM TURBINE CYCLE	13.1	12.1	13.0	11.9		12.9	11.8	14.8	12.5
9	DEMINERALIZED WATER MAKEUP TO HRSG/STEAM TURBINE CYCLE	26.2	24.3	26.1	23.7		25.8	23.6	29.6	25.1
10	WATER INJECTED INTO COMBUSTION TURBINES DURING OIL FIRING	0	685	0	690		0	674	0	0
11	DEMINERALIZED WATER SENT TO SERVICE AND FIRE WATER TANK	0	0	0	0		0	0	77.6	77.6
12	TOTAL DEMINERALIZED WATER USED	26.2	709	26.1	714		25.9	698	107	103
13	TOTAL DEMINERALIZED WATER PRODUCED	26.2	161	26.1	160		25.9	160	107	103
14	EVAPORATION FROM TWO (2) EVAPORATIVE COOLERS	0	0	0	0		0	0	38.8	38.8
15	BLOWDOWN FROM TWO (2) EVAPORATIVE COOLERS	0	0	0	0		0	0	38.8	38.8
16	MAKEUP TO TWO (2) EVAPORATIVE COOLERS	0	0	0	0		0	0	77.6	77.6
17	FIRE PROTECTION WATER	0	0	0	0		0	0	0	0
18	TURBINE BUILDING FLOOR DRAINS	2.0	2.0	2.0	2.0		2.0	2.0	2.0	2.0
19	TOTAL FIRE AND SERVICE WATER USES	28.2	163	28.1	162		27.9	162	187	182
20	MUNICIPAL WATER SUPPLIED TO SERVICE AND FIRE WATER TANK	15.1	150	15.1	150		14.9	150	55.6	53.4
21	DRAINS FROM POTABLE WATER SYSTEM	1.0	1.0	1.0	1.0		1.0	1.0	1.0	1.0
				 						-
	DECLINE IN DEMINERALIZED WATER TANK VOLUME	0	549	0	553		0	537	0	0

NOTES: 1. STORMWATER FLOW RATES SHOWN ABOVE ARE BASED ON YEARLY AVERAGE RAINFALL OF 51.1 INCHES.

- HRSG BLOWDOWN FLOW RATES ARE BASED ON 1% OF THE HP AND IP STEAM RATES FOR EACH HEAT BALANCE CASE.
 50% OF THE BLOWDOWN WILL BE FLASHED TO ATMOSPHERE AND 50% WILL BE RECYCLED TO THE SERVICE AND FIRE WATER TANK.
- FLOW RATES OF DEMINERALIZED WATER INJECTED INTO THE COMBUSTION TURBINES DURING OIL FIRING ARE FROM GE HEAT BALANCES DATED 7/8/2014 AND 12/22/2014.
- 4. THE MUNICIPAL WATER SUPPLY OF 151.4 GPM FOR THE OIL FIRED CASES IS BASED ON A MAXIMUM ALLOWABLE DAILY USE OF 218,000 GALLONS FROM OCTOBER 16 TO APRIL 15. FROM APRIL 16 TO OCTOBER 15, THE MAXIMUM DAILY USE IS 150,000 GALLONS. MAXIMUM USE RATES WERE DEFINED BY HERITAGE VILLAGE WATER COMPANY.
- 5. EVAPORATIVE COOLER BLOWDOWN IS BASED ON TWO (2) CYCLES OF CONCENTRATION.
- 6. DEPENDING ON PLANT OPERATING CONDITIONS, SULFURIC ACID OR CAUSTIC MAY NEED TO BE ADDED IN THE HRSG BLOWDOWN TREATMENT SYSTEM TO CONTROL WATER CHEMISTRY IN THE SERVICE AND FIRE WATER TANK.

2(l)

DECOMMISSIONING PLAN.

DOCKET NO. 192B CPV TOWANTIC, LLC CERTIFICATE OF ENVIRONMENTAL COMPATIBILITY AND PUBLIC NEED DEVELOPMENT AND MANAGEMENT PLAN CONDITION 2.1 – DECOMMISSIONING PLAN

In accordance with the Connecticut Siting Council's May 14, 2015 Decision and Order (Docket No. 192B, Item 2.1), CPV Towantic, LLC hereby provides the following information with regard to the Facility's decommissioning plan.

USEFUL LIFE OF POWERPLANT AND NEED FOR DECOMMISSIONING

State-of-the-art combined-cycle powerplants like the CPV Towantic Energy Center (the Project or the Facility) are designed for an expected operational life of at least 35 years. As the Facility approaches the end of its operational life, it is expected that technological advances will make available more efficient and cost-effective power generation equipment that will economically drive the replacement of the existing equipment. This Decommissioning Plan establishes the approach to conduct decommissioning activities for the permanent closure of the combined-cycle power plant and appurtenant equipment at the permanent cessation of the Facility's operation in the event that the existing equipment is not replaced at the time of such a permanent closure. This Plan also describes the approach for removal and/or abandonment of facilities and equipment associated with the Facility's operation.

As background, CPV Towantic, LLC (the Company) has entered into a development agreement with the Town of Oxford that generally requires the Company to decommission, dismantle and dispose of the Facility in good and workmanlike fashion at the end of the Facility's useful life as determined by the Company. The Development Agreement also calls for the Company to maintain financial assurance in the amount of Six Million Dollars (\$6,000,000.00) to ensure that adequate funds are available to allow for the proper restoration of the site.

DECOMMISSIONING ACTIVITIES

The Company's decommissioning activities will be performed in accordance with then-current legal and regulatory requirements. The activities contained herein are based on current, best practices and may be modified based on best practices at the time of decommissioning.

Decommissioning will involve removal and proper disposal or recycling of all Project components. Any non-recyclable materials will be properly disposed of at a nearby landfill or otherwise appropriate facility.

Decommissioning Preparation

The first step in the decommissioning process will be to prepare the site for decommissioning. Access roads, fencing, and electrical power will remain in place for use by the decommissioning and site restoration workers until no longer needed. Demolition debris will be placed in temporary on-site storage areas pending final transportation and disposal/recycling according to the procedures listed below.

Power Generation Equipment Removal and Recycling

During decommissioning, all Facility components that will not be used will be removed from the site. Facility components will be sold, recycled or transported off-site for disposal as appropriate. Concrete foundations and pads will be broken up and/or removed to an appropriate depth below ground surface.

Internal Power Collection System

The underground conduits and cables contain no materials known to be harmful to the environment. These items will be cut back to an appropriate depth below ground surface, unless required for future development.

Access Roads

The onsite access driveway and roads will remain in place to accomplish decommissioning at the end of the Facility's life. If the access driveway and roads will be beneficial for the future use of the site, they will remain after decommissioning. The future use of the site is undetermined at this time. Roads that will not be used will be restored to pre-construction conditions by removal of the aggregate base material, fill of the compacted base section with locally imported soil to match existing onsite soils, and hydroseeding with a seed mix to match existing onsite groundcover.

Security Fence

The chain link perimeter security fence and appropriate signage will remain in place during decommissioning activities for site safety and security purposes. The fence may remain after decommissioning if beneficial for a future use. The future use of the site is undetermined at this time. If the fence will not be used, it will be removed and holes left behind by the fence support posts will be backfilled.

Natural Gas Interconnection Line & Metering Station

The natural gas interconnection line and metering station will remain in place during decommissioning activities. At the time of decommissioning, if it is determined that this natural gas line and metering station will be beneficial for the future use of the site, the line and metering station may remain after decommissioning. If the line and metering station are not to be used, they will be removed in accordance with Spectra Energy's guidelines.

2(m)

UPDATED FUEL STORAGE AND HANDLING PLAN INCLUDING CONTAINMENT AND OTHER MEASURES TO PROTECT AGAINST SPILLAGE WHEN THE ULSD TANK IS BEING REFILLED.
DOCKET NO. 192B CPV TOWANTIC ENERGY LLC CERTIFICATE OF ENVIRONMENTAL COMPATIBILITY AND PUBLIC NEED DEVELOPMENT AND MANAGEMENT PLAN CONDITION 2.m – FUEL STORAGE AND HANDLING PLAN

In accordance with the Connecticut Siting Council's May 14, 2015 Decision and Order (Docket No. 192B, Item 2.m), CPV Towantic, LLC provides the following information with regard to an updated fuel storage and handling plan including containment and other measures to protect against spillage when the ULSD tank is being refilled.

On-Site Fuel Use

An existing natural gas pipeline will extend onto the Project site and deliver natural gas to the Project. Since the Project will tap into the existing pipeline prior to the adjacent Spectra compressor station, gas compression will occur on-site in the northeastern portion of the site. There will be no on-site storage of natural gas at the facility.

The Project proposes to use ultra-low sulfur distillate (ULSD) for up to 720 hours per year to ensure availability of the Project's output during periods of critical need. ULSD will be stored in a 1.5 million gallon, 48-foot tall, double walled tank with secondary containment designed to hold 110% of the tanks capacity. Fuel oil storage shall be in accordance with state and federal requirements, including separation from flammable materials. The Department of Transportation Segregation and Incompatibility Chart will be used to ensure proper storage and segregation. The ULSD tank will be inspected to confirm the tank is in good condition. The adjacent fuel oil unloading station will be designed to allow the unloading of four trucks simultaneously, located within a curbed unloading area to contain any spills. Other ULSD storage areas will be adjacent to the skids associated with the emergency diesel generator and fire pump. The ULSD storage and unloading area are highlighted in Figure 1 attached.

<u>Handling</u>

As specified in Condition 2.b, natural gas will be supplied by a lateral off of the Algonquin Gas Transmission line. The lateral enters the metering and regulation (M&R) station where gas is first filtered, metered, heated then regulated. Gas compression facilities are also provided inside the power plant fence line to boost gas pressure in the event that inlet pressure is lower than required for the power plant gas turbines.

Other than the refilling process, handling of ULSD on-site should also be minimal. The refilling process should only be completed by a trained personnel with the appropriate equipment and personal protective equipment. Spills or leaks will be immediately contained and reported in accordance with CT DEEP regulations and the Facility's SPCC plan.

Inventory and Inspections

An inventory of controlled materials, such as fuels, shall be maintained.

Periodic inspection of the following will occur by appropriate personnel to ensure proper maintenance in accordance with the Spill Prevention Control and Countermeasure Plan (SPCC) Plan as specified in Attachment A: the fuel oil storage tank; oil, fuel, and chemical containers; and oil-containing equipment. Records of inspections, as well as any spill incidents that are found, will be maintained. In addition to inspecting the equipment, the appropriate personnel will periodically review sub-contractors for proper procedures in the event of a spill, spill prevention techniques, and safety procedures.

Spill Prevention/Control/Containment

The Project site is located approximately 0.4 mile from the headwater drainage of Jacks Brook. A stormwater detention pond has been incorporated into the design of the facility, located on the southeast corner, to contain and control rainwater runoff. The pond will also provide protection for emergency spills that could occur on-site.

All spills shall be reported immediately to the appropriate personnel. Following a spill, the source of the spill shall be located and corrective action shall be taken immediately to contain it. Temporary containment and clean-up of all spills will follow a strict set of protocols depending on the type and volume of material spilled.

In the event of a spill during refueling or refilling, oil dry and absorbent pads will likely be placed on any spills to contain and collect any fluid. Shovels and other hands tools will also be used to collect the materials in drums for proper disposal.

In the event of fuel spilled due to storage tank, piping, and/or valve failure, actions will be quickly taken to contain any fluid not immediately gathered into the diked/bermed areas surrounding the aboveground storage tank. Once contained, a clean-up contractor would be contracted to collect the released material and any contaminated soil.

Routine storage of small quantities of liquids shall be accomplished in such a manner as to prevent a spill by providing a flat surface for storage and, where necessary, a berm or dike shall be constructed around the storage area to contain any possible spill. Liquid waste shall be collected into tanks and stored for salvage or disposal off-site. Concrete curbing will be used to contain any liquid leaks or spills, and all traveling equipment shall be maintained to minimize oil, grease, and hydraulic fuel leakage.

A draft SPCC plan anticipated for use during Project construction is provided as Attachment A. Prior to commencement of construction this version will be finalized, including appropriate certifications by a Professional Engineer, and the SPCC plan will be used and updated as appropriate throughout the construction effort. As construction is completed, the SPCC plan will be refined and adjusted to reflect operational conditions, and to include appropriate contacts and procedures reflecting operational conditions at the site.

Attached:

• 'Draft Construction SPCC Plan.docx'

TOWANTIC ENERGY CENTER DRAFT CONSTRUCTION SPILL PREVENTION CONTROL AND COUNTERMEASURE PLAN

1. Facility Information

Name Facility: Location:	CPV Towantic Energy Center Oxford, Connecticut
Owner:	CPV Towantic, LLC Subsidiary of CPV Power Development, Inc. 50 Braintree Hill Office Park, Suite 300 Braintree, MA 02184
Contractor:	Contractors (to be determined) Address 1 Address 2 City, State, Zip

2. Facility Contacts

Construction Project Manager (to be determined)Phone: TBDOil Spill Control Officer Contractor (to be determined)Phone: TBD

3. Construction Description

A. OPERATIONS

During construction of the CPV Towantic Energy Center, heavy equipment such as bulldozers, and front-end loaders will be the primary means of excavation. Excavation and site grading is expected to take two to three months. After site excavation and grading is complete, the primary equipment required for the facility construction will be heavy mobile equipment and cranes. It is anticipated that the majority of equipment refueling will be provided by an independent fuel delivery contractor that will refuel equipment directly from their mobile fuel trucks.

B. STORAGE

Oil, diesel fuel, gasoline, and chemical storage devices on-site during construction may include the following:

- 1. Fuel trucks that will deliver fuel to the site to fill heavy equipment (loaders, dozers, etc.) and storage tanks.
- 2. Heavy equipment with large fuel capacity such as front-end loaders, bulldozers, and cranes.
- 3. Small aboveground storage tanks of 300 gallons or less, containing diesel fuel or gasoline, with lined, bermed containment.
- 4. Storage bins containing items such as cleaning and disinfectant agents.

C. DRAINAGE PATHWAY AND DISTANCE TO NAVIGABLE WATERS

The CPV Towantic Energy Center construction site is located approximately 0.4 miles from the headwater drainage of Jacks Brook. The construction site will include a stormwater runoff detention pond located on the southeast corner of the site that will

contain and control rainwater runoff. The pond will also provide protection for emergency spills that could occur on site. Furthermore, this pond will be built at a very early stage of construction.

4. Spill History

No spills have occurred nor have been reported at the construction site.

5. Potential Spill Predications and Volumes Spilled

Possible means of spillage and volume spilled are as follows:

- 1. Fuel release during refueling operations of heavy and light equipment and/or aboveground storage tanks. Possible amount spilled is dependent upon the capacity of the refueling tank and the time required to stop the spill.
- 2. Fuel release due to storage tank, piping, and/or valve failure. Possible amount spilled is dependent upon the capacity of the tank and the time required to stop the spill.
- 3. Chemicals release during handling and use. Possible amount spilled is dependent upon size of container and the time required to stop the spill.

6. Prevention Measures

A. DRAINAGE CONTROL

Oil dry and absorbent pads will be placed on any spills to contain and collect any fluid in the event of spillage. Shovels and other hand tools will also be used to collect the materials in drums for property disposal.

In the event of fuel spilled due to storage tank, piping, and/or valve failure, ditches would be quickly dug to contain any fluid not immediately gathered in the diked/bermed areas surrounding the aboveground storage tanks. Once contained, a clean-up contractor would be contracted to collect the release material and any contaminated soil.

B. BULK STORAGE TANK/SECONDARY CONTAINMENT

All aboveground storage tanks will be no larger than 660 gallons and will be constructed of welded steel in accordance with API Standards and will be compatible with the contents they may hold. All aboveground storage tanks will be securely grounded and placed within a lined, diked/bermed area that is 1) large enough to store the entire contents of the tanks plus 10 percent; 2) located so as to prevent spilled oil from leaving the site; and 3) located where it will not be subject to periodic flooding or washout.

In addition, all aboveground storage tanks will be periodically inspected for leaks, corrosion, and basic wear and tear. If a leak is detected, measures will be taken to minimize and mitigate the leak while waiting for repair.

C. CONTRACTOR EQUIPMENT MAINTENANCE

Lubrication oils from contractor's equipment will be drained into appropriate containers with spill protection measures in place. In no event will lubrication oils be allowed to drain onto the ground surface.

D. FACILITY TANK TRUCK LOADING/UNLOADING OPERATIONS

The CPV Towantic Energy Center will require all supply companies who deliver oil, fuel, and other chemicals to the construction site to comply with DOT regulations in 49 CFR part 177 (where applicable), and facility operating procedures. Equipment refueling

operations will be done at the equipment location. Refueling personnel will be present to observe fueling operations at all times.

E. INSPECTIONS/RECORD KEEPING

The safety manager , designated by either the Head Contractor or the Construction Project Manager, will ensure that periodic inspections of fuel storage tanks, oil, fuel, and chemical containers, and oil-containing equipment are properly conducted in accordance with provisions set forth in this Plan. The Oil Spill Control Officer will also be responsible for assuring that written standard procedures are followed regarding clean-up of oil, fuel, and chemical spills, fuel transfers, inspection of oil-containing equipment, and releases of rainwater accumulated in containment structures. In addition, he/she will be responsible for maintaining records of inspection and spill incidents that have been filled out on the appropriate forms attached to this plan. All procedures and inspection records may be found in Appendix A, B, C, D, E, and F.

In the event of a spill, the Oil Spill Control Officer or other construction management onsite, will supervise clean-up activities. An Oil Spill Incident Report (Appendix B) will be completed in the event that any spill reaches regulated water. Contained discharges or leaks will be reported in Appendix E.

In addition, according to federal regulations (40 CFR 112), the owner or operator of any facility which experiences a single spill of 1,000 U.S. gallons of oil or more, or spills in lesser amounts on two occasions within any twelve-month period, which reach regulated waters must, within 60 days of the occurrence, submit a report to the Regional Administrator of the US EPA containing:

- 1. The name, location, and date of initial operation of the facility.
- 2. Name of the owner or operator.
- 3. Oil storage capacity at facility.
- 4. Description of the facility, including maps of the site, oil flow path, and topographical maps.
- 5. A complete copy of the SPCC Plan with any amendment thereto.
- 6. The cause of the spill, including a failure analysis of the system.
- 7. The corrective actions or countermeasures taken.
- 8. Additional preventative measures taken or contemplated to minimize the possibility of recurrence.
- 9. Other information required by the EPA Regional Administration.
- 10. Such report should be sent to:

Regional Administrator United State Environmental Protection Agency Region 1 5 Post Office Square, Suite 100 Boston, MA 02109-3912

and

Connecticut Department of Energy and Environmental Protection 79 Elm Street Hartford, CT 06106-5127

F. SITE SECURITY

The construction site will have a perimeter fence and a main access gate for security. The site will be staffed during normal work hours. The main entrance gate will be locked at all times for non-working hours.

G. PERSONNEL TRAINING AND SPILL PREVENTION PROCEDURES

CPV Towantic requires all supply companies who delivery oil, fuel, and other chemicals to the construction site to be trained in spill prevention techniques and safety procedures. The Oil Spill Control Officer will periodically review with contractor's supervisors proper operation and maintenance of equipment to prevent spills; proper procedures in the event of a spill; potential spill situations and how to properly complete and follow the inspection records; and procedures found in Appendix A, B, C, D, E, and F.

H. SPILL CONTROL EQUIPMENT

The general contractor on-site will have a variety of equipment and materials on-site to control and clean-up any spills that could occur on-site. This will include the following:

<u>Equipment</u>	<u>Quantity</u>
Oil Dry Absorbent	Quantity to be determined. Based on a maximum spill of 300 gallons.
Large Packs of Absorbent Pads	Quantity to be determined. Based on a maximum spill of 300 gallons.
55-Gallon Drums	Quantity to be determined. Based on a maximum spill of 300 gallons.

I. EMERGENCY CONTACTS

(i) Initial Notification

For uncontained spills to regulated waters, the plant personnel shall first notify the Project Oil Spill Control Officer (or alternate) listed in Table 1-1. Construction personnel shall then refer to Appendix A for containment and clean-up guidelines.

It shall be the responsibility of the Oil Spill Control Officer to notify the following agencies as quickly as possible in their listed order in the event of spill to navigable waters.

Connecticut Department of Energy and Environmental Protection

Oil and Chemical Spill Section (800) 424-3339 24 hours

National Response Center

(800) 424-8802

(ii) Other Emergency Telephone Numbers

The telephone numbers for emergency services such as the police, the fire department, and the hospital, are listed here for the employee's convenience. While these emergency services are not necessarily needed in the event of a spill, they may be called at the discretion of the employee, or at the discretion of the Oil Spill Control Officer.

Oxford Fire Department	Police Department	St. Mary's Hospital
(203) 888-9090	Resident Trooper	Waterbury
	(203) 888-4353	(203) 753-2574

(iii) Other Discharges

In the event of an oil discharge or leak, plant personnel on duty should quickly assess the source, volume, and location of the spill, and initiate the following response procedure. If the plant person is alone on duty, he should stop the source of the leak only if this can be accomplished quickly and safely, and then he should contact the appropriate personnel using the Notification Procedure. Otherwise, he should immediately start the Notification Procedure. If more than one person is on duty, one can immediately attempt to control the leak, while the other executes the Notification Procedure.

Notification Procedure: The plant personnel shall notify the Oil Spill Control Officer (or alternate) listed in Table 1-1. For contained discharges, Appendix E shall be used to record disposal of oil and oily materials from clean-up operations.

TABLE 1-1 OIL SPILL NOTIFICATION PERSONNEL			
In case of an Oil Spill, Call: Oil Spill Control Officer (and Alternates)			
Designation	Name	Office Telephone	Home Telephone
Oil Spill Control Officer	[To be assigned]		
1 st Alternate	[To be assigned]		
2 nd Alternate	[To be assigned]		
NOTE: If the Oil Spill Control Officer and his alternates cannot be reached, notify other plant management personnel.			
Others who may be called as needed:			
Construction Project Manager			
1 st Alternate	[To be assigned]		
2 nd Alternate	[To be assigned]		

GUIDELINES TO CONTAIN AND CLEAN-UP A SPILL

SAFETY FOR ALL PERSONNEL SHALL BE THE FIRST PRIORITY DURING IMPLEMENTATION OF THESE GUIDELINES

CLEAN UP SHOULD BE CARRIED OUT PROMPTLY AFTER A SPILL OR DISCHARGE IS DETECTED. ACTUAL RECOVERY OF MATERIALS AND CLEAN-UP OPERATIONS WILL BE CONDUCTED BY SPILL RESPONSE CONTRACTORS

- 1. Locate the source of the spill and stop it as quickly as reasonably possible by closing valves, shutting down pumps, plugging leaks or other appropriate methods.
- 2. Communicate the character of the spill to all personnel, identifying the location, severity and product.
- 3. Contain a spreading or moving spill before concentrating on other efforts. If very little has reached water, for example, but more is draining towards water, concentrate on blocking spill. On-site conditions dictate proper actions. On-site supervisors should insure proper actions are taken.
- 4. If spill is in water, encircle it in the water to pull it into a shoreline that has not been contaminated.

A contained spill is picked up by manually skimming with buckets or preferably with cans or containers having a flat edge; these are then dumped into a drum, tank or tanker for removal. If equipment is available, skimming can be done with pumps, hoses, and tanks. If shoreline has already been contaminated, the light slick remaining after skimming can be herded onto the contaminated shore for pick-up as described below. If the shoreline is still relatively clean, absorbent materials should be used to recover the remaining floating slick or by pumping into a tank or oil/water separator.

- 5. Oil or hazardous chemicals on soil or on a contaminated shoreline are picked up by soaking with absorbent pads and other approved materials. Saturated pads shall be deposited in drums and disposed of at the DEEP-approved disposal site.
- 6. Spills on land consisting of puddles or pools are picked up by pumps or buckets and loaded into tanks or tank trucks for delivery as directed by the Oil Spill Control Officer. Remaining contaminated earth is removed by hard shovels or construction equipment and loaded into drum containers for disposal at an approved waste disposal site.
- 7. Disposal
 - a. Liquid oily wastes consisting of oil or oil and water will be transferred to containers or tanks.
 - b. Hazardous chemical liquids, spill saturated earth, and absorbent pads, shall be deposited in drums with adequate cover to prevent stormwater contamination and overflow. Disposal shall be made to a DEEP-approved site.

This form shall be used in the event that a spill of oil reaches a regulated water, which includes small streams and wetlands.

OIL SPILL INCIDENT REPORT FORM			
Spill Date			
Date of Report			
Location of Spill			
Individual Who Discovered Spill			
Type of Oil Spilled			
Estimated Volume of Spill			
Estimated Volume to Reach Waters			
Estimated Area Effected			
Clean-Up Cautions Taken			
Corrective Action & Countermeasures Taken to Stop Spill			
Failure Analysis of Cause of Spill			
Measures Necessary to Prevent Reoccurrence			
This Report Prepared By	Date:		

The following procedure shall be followed regarding the transfer of fuels from fuel delivery trucks to equipment fuel tanks and to aboveground storage tanks:

The fuel vendor's personnel shall:

- 1. Coordinate fuel delivery time with facility.
- 2. Inspect fuel delivery truck hoses, compartments, etc. Prior to entry into the facility grounds to assure the truck is free of potential sources for a spill.
- 3. Manually check fuel tank to determine the fuel levels.
- 4. Where applicable, inspect containment area drain valves prior to allowing transfer connections, making sure that such valves are closed.
- 5. Reset fueling meters prior to all fueling.
- 6. Make proper connections of fuel delivery truck connections to master valves prior to transfer.
- 7. Activate pumping system of fuel delivery truck.
- 8. Monitor the transfers to avoid overflow, positioning themselves to ensure fuel level is visible at all times during refueling.
- 9. Be prepared to shutoff feed valves and master valves in the event of premature disconnection, rupture of the transfer hoses or leaks at valves or fittings.
- 10. If the fuel supplier must leave the fueling port, the transfer will be shut off during their absence.
- 11. At no time, leave during the transfer process.
- 12. Shutoff pumping system to release pressure from system and purge remaining fuel from hose into tank when tank is full.
- 13. Assure that after each transfer option, all feed valves and master valves are properly closed prior to disconnection.
- 14. Assure that transfer hoses are properly disconnected and stored before the fuel delivery truck driver is allowed to move the vehicle.
- 15. Fuel vehicles are required to carry EPA-approved absorbent pads and tubes to clean-up any inadvertent spills or leaks.

Appendix D INSPECTION PROCEDURES AND RECORDS FOR STORAGE TANKS AND OIL CONTAINING EQUIPMENT

The purpose of storage tank and oil equipment inspections is to prevent spillage and to identify and report oil leaks so they may be corrected prior to a significant spill event. The Oil Spill Control Officer or his designee shall use the Inspection Records form in this Appendix to record the results of periodic inspections and any leaks or spills from storage tanks or oil containing equipment. Specific attention to several potential concerns shall be given during inspections by the Oil Spill Control Officer and during routine operations by Facility personnel:

- 1. Storage tanks, oil equipment, and associated valves and aboveground pipeline should be frequently observed by operating personnel for signs of deterioration, leaks which might cause a spill, or accumulations of oil.
- 2. Visible oil leaks resulting in a loss of oil from tank seams, gaskets, rivets, and bolts, which are sufficiently large enough to cause the accumulation of oil, should be reported to the Oil Spill Control Officer and the Construction Project Manager for repair.
- During inspections, paved or lined storage areas shall be observed for the presence of cracks, gaps, or leaks which, if found, shall be reported to the Oil Spill Control Officer for repair.

INSPECTION RECORD FOR STORAGE TANKS AND OIL CONTAINMENT EQUIPMENT				
Date	Tanks or Equipment	Reason for Report	Action Taken	Inspected By

Appendix E INSPECTION RECORDS FOR OIL REMOVAL FROM SECONDARY CONTAINMENT

In the event of non-reportable oil discharge or leaks, this Appendix shall be used to record disposal of oil and oily materials from such routine or clean-up operations.

INSPECTION RECORD FOR OIL REMOVAL FROM SECONDARY CONTAINMENT				
Date	Containment System	Amount Removed	Disposal Details	Inspected By

The following procedure shall be followed by the on-site contract personnel to drain stormwater from aboveground fuel tank containment areas:

- 1. The Contractor's designated inspector shall be responsible for draining stormwater from containment areas.
- 2. All containment drain valves shall be closed at all times except during draining actions. Prior to opening drain valves, containment areas shall be inspected to determine if there are oil or hazardous chemical accumulations or potential leak sources in the containment area.
- 3. If inspection of the contained water indicates that release of the water will not cause a harmful discharge or a violation of water quality standards then the stormwater shall be released. Such stormwater releases should be closely monitored to avoid any release of oil or chemical or release of water that has an oil sheen. After stormwater from the containment area is drained, all valves shall be closed. Releases of stormwater in this manner shall be recorded on the form provided in this Appendix F. If it is necessary to remove accumulations of oil or chemicals from the containment area, the oil should be pumped into 55-gallon drums, or other containers provided by Contractor, and disposed at an approved DEEP disposal site.
- 4. All drain valves shall be returned to the closed position after completion of these procedures. Under no circumstances should a drain valve be in an open position if the area is to be unattended. Sumps and other catch basins should be routinely inspected to ensure their proper operation.

INSPECTION RECORD FOR STORMWATER RELEASES				
Date	Containment System	Water's Appearance	Disposal Method	Inspected By

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CONTAINMENT AND/OR PROTECTIVE MEASURES FOR THE SAFE DELIVERY AND STORAGE OF HYDROGEN AND AQUEOUS AMMONIA.

DOCKET NO. 192B CPV TOWANTIC ENERGY LLC CERTIFICATE OF ENVIRONMENTAL COMPATIBILITY AND PUBLIC NEED DEVELOPMENT AND MANAGEMENT PLAN CONDITION 2.n – DELIVERY AND STORAGE OF HYDROGREN AND AQUEOUS AMMONIA

In accordance with the Connecticut Siting Council's May 14, 2015 Decision and Order (Docket No. 192B, Item 2.n), CPV Towantic, LLC provides the following information with regard to containment and/or protective measures for the safe delivery and storage of hydrogen and aqueous ammonia.

Hazardous Material Use and Control

From purchase to consumption and disposal, hazardous waste will be carefully tracked and monitored. This holistic approach to hazardous waste management will help to minimize the waste stream due to misuse or overuse of products. A draft Spill Prevention, Control, and Countermeasure (SPCC) Plan has been prepared to help prevent any discharge of fuel oil as well as handle any unanticipated spill or release; the operational SPCC plan will also incorporate additional details reflecting other chemical storage.

Aqueous Ammonia

Aqueous ammonia will be stored in a single aboveground tank. The ammonia truck unloading area will be paved with concrete, sloped and curbed, and provided with a sump for post indicator valve drainage to contain a potential spill. The on-site ammonia tank storage system is expected to consist of single-walled tank located above a secondary containment area capable of holding 110% of the tank's volume. The ammonia tank will allow for a maximum of 20,000 gallons of 19% aqueous ammonia to be stored on-site. Tank alarms will immediately notify facility personnel in the event of an accidental release. An emergency shower/eyewash designed to meet ANSI Z358.1-2009 standards will be located in proximity to the tank, but outside the containment area. Proper training in emergency procedures and emergency respirators will be available at the facility for use by trained personnel. Curbing and containment will be used in the ammonia delivery area, as well, to prevent accidental release to the environment during ammonia deliveries.

In order to ensure high plant availability, the contents of the tank will not be allowed to drop below 20% capacity. Therefore, a minimum of 4,400 gallons will be stored on-site at all times. Truck(s) will resupply this tank semi- to bi-weekly depending on dispatch. These preliminary figures may be finalized by the EPC contractor during the final stages of development.

Ammonia vapor has a sharp, irritating, pungent odor. The average odor threshold is well below any danger or damaging level. However, ammonia can be toxic by inhalation and is carefully handled and managed to prevent releases. Ammonia is an irritant, and corrosive to the skin, eyes, respiratory tract, and mucous membranes.

The use of 19% solution aqueous ammonia significantly reduces the risk that would otherwise be associated with the use of anhydrous ammonia. Use of the aqueous form eliminates the high internal energy associated with storage of anhydrous ammonia at elevated pressures, which could act as a driving force in the event of an accidental release. Spills associated with the aqueous form, as proposed, are much easier to contain than those associated with anhydrous ammonia and emissions from such spills are limited by the slow evaporation rate from the surface of the spilled material. Facilities that store aqueous ammonia solutions containing less than 20% ammonia by weight are not subject to the Accidental Release requirements contained in §112r of the Federal Clean Air Act. As a comparison, household ammonia ranges in concentration from 5 to 10%.

Hydrogen

Hydrogen gas will be used by the Project as a generator coolant, and will be stored in trailers near the generators, away from electrical lines and other potential ignition sources, as required by applicable building and fire codes. Hydrogen is a flammable gas and has an NFPA hazard rating of 4. The hydrogen trailers will also be protected from vehicular impact by installation of crash posts or other protective measures. Hydrogen deliveries will generally occur on a monthly basis.

Purchasing

Anytime that chemicals and substances are requisitioned, the Material Safety Data Sheet (MSDS) will be requested prior to placing the order. Once the MSDS is received, an analysis will be completed to determine if any of the requested chemicals may trigger any reporting requirements or if use of the material would likely result in the generation of hazardous waste. If so, alternatives to using the chemical or substance, including replacement of the chemical with a non-hazardous or less hazardous chemical, will be explored. The chemical or substance will also be evaluated to determine if the use would violate any facility policies or procedures. A Chemical Control Form, summarizing the manufacturer, the chemical name, quantities, and what it will be used for, will be completed. Absent any specific prohibitions from the use of the chemical or substance, written approval shall be granted without undue delay.

Receiving

Once the material is received on-site, the quantity that is received will be verified and the material will be stored in the designated areas on-site by the appropriate personnel.

Storage

Storage of all hazardous chemicals shall be in accordance with state and federal requirements, including separation of flammable materials from other chemicals and separation of incompatible materials. The Department of Transportation Segregation and Incompatibility Chart will be used to ensure proper storage and segregation. All containers shall be double walled or kept in secondary containment to prevent contamination of the ground.

Dispensing

All miscellaneous chemicals shall be controlled and dispensed from a designated area on-site. Only enough product to successfully complete the job shall be requested and dispensed. Any unused product shall be returned to the designated area on-site when the task is completed. If the product must be used in a two-part task, or transferred between a bulk container and a field-use container, a specific process should be followed. Only appropriate containers for the product should be used, and the container(s) must be clearly labeled. Only the necessary amount of product should be transferred, and the container will never be left unattended. If any product is spilled during the transfer, the appropriate personnel will be notified.

Inventory and Inspections

An inventory of controlled materials, such as fuels, solvents, and welding gases, shall be maintained. Storage tanks; oil, fuel, and chemical containers; and oil-containing equipment will be periodically inspected by the appropriate personnel to ensure proper maintenance in accordance with the SPCC Plan. Records of inspections, as well as spill incidents, must be maintained. In addition to inspecting the equipment, the appropriate personnel will periodically review sub-contractors for proper procedures in the event of a spill, spill prevention techniques, and safety procedures.

Spill Prevention/Control/Containment

All spills shall be reported immediately to the appropriate personnel. Following a spill, the source of the spill shall be located and corrective action shall be taken immediately to contain it. Temporary

containment and clean-up of all spills will follow a strict set of protocols depending on the type and volume of material spilled.

Hazardous materials shall be stored in areas so as not to spread the spill hazard to more than one location. Storage of liquids shall be limited to bulk tanks and/or 55-gallon barrels on level storage areas surrounded by a berm or dike to contain any possible spill.

2(o)

MAINTENANCE OF DETENTION BASINS.

DOCKET NO. 192B CPV TOWANTIC, LLC CERTIFICATE OF ENVIRONMENTAL COMPATIBILITY AND PUBLIC NEED DEVELOPMENT AND MANAGEMENT PLAN CONDITION 2.0 – MAINTENANCE OF DETENTION BASINS

In accordance with the Connecticut Siting Council's May 14, 2015 Decision and Order (Docket No. 192B, Item 2.0), CPV Towantic, LLC hereby provides a detailed narrative and set of plans regarding maintenance of detention basins in the referenced attachment.

Attached

• Drawing C331, contained in '98132 D&M Plans 6-30-15.PDF'

2(p)

BACKUP GENERATOR DESIGN AND CONTAINMENT MEASURES FOR FUEL, OIL AND COOLANT.

DOCKET NO. 192B CPV TOWANTIC, LLC CERTIFICATE OF ENVIRONMENTAL COMPATIBILITY AND PUBLIC NEED DEVELOPMENT AND MANAGEMENT PLAN CONDITION 2.p – BACKUP GENERATOR

In accordance with the Connecticut Siting Council's May 14, 2015 Decision and Order (Docket No. 192B, Item 2.p), CPV Towantic, LLC hereby provides the following information with regard to the backup diesel generator design.

CPV Towantic will operate up to a 1,500 kW diesel fire emergency engine in order to provide emergency back-up power to the facility. The generator will not connect to the electric grid and will only be utilized as an emergency engine. The diesel engine will be equipped with the safety measures described below.

The diesel generator will be furnished with an outdoor enclosure to shield the engine from any equipment degradation due to unforgiving elements. The enclosure will also help to minimize the risk of lube oil and coolant leakage from the engine.

The diesel generator will also have a "belly" tank that makes up the bottom of the skid that contains the diesel fuel. The generator and engine will sit right on top of the belly tank. Care will be taken to ensure that belly tank is isolated as much as possible from the generator. This is done by placing springs between the generator and the base tank and by using flexible hose connections to feed fuel to the engine. The belly tank is built as a structural component to not only withstand vibration but also to support the entire weight of the engine generator.

The belly tank is a double walled tank with a rupture basin in between the generator and the tank. The double wall containment system prevents leaks, and allows for optimal fuel levels and peak tank capacity. The fully contained tank allows total containment of system fluid under pressure in the event of a primary vessel failure. The tank is designed in accordance with UL 142 "Steel Aboveground Tanks for Flammable and Combustible Liquids".

Attached is a typical emergency diesel drawing package, similar to what will be provided on the Project.

Attached

• 'Condition 2.p - Diesel Gen Package Typ. R1.PDF'









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FINAL REPORT ON WILDLIFE SURVEYS PERFORMED IN 2015 AND ANY RECOMMENDED MEASURES TO MITIGATE WILDLIFE IMPACTS DUE TO CONSTRUCTION AND/OR HABITAT LOSS.

DOCKET NO. 192B CPV TOWANTIC, LLC CERTIFICATE OF ENVIRONMENTAL COMPATIBILITY AND PUBLIC NEED DEVELOPMENT AND MANAGEMENT PLAN CONDITION 2.q – FINAL WILDLIFE SURVEY REPORT & MITIGATION RECOMMENDATIONS

In accordance with the Connecticut Siting Council's May 14, 2015 Decision and Order (Docket No. 192B, Item 2.q), CPV Towantic, LLC hereby provides the following attached final wildlife survey and mitigation recommendation report.

Attached

• Wildlife Survey Results, 'CPV Towantic Oxford_FINAL_WILDLIFE_REPORT_7-14-15.PDF'

2(q)

*SEE ATTACHED PDF DOCUMENT FOR COPY OF THE WILDLIFE SURVEY REPORT.
2(r)

DEWATERING PLAN TO ADDRESS GROUNDWATER ISSUES DURING CONSTRUCTION.

DOCKET NO. 192B CPV TOWANTIC, LLC CERTIFICATE OF ENVIRONMENTAL COMPATIBILITY AND PUBLIC NEED DEVELOPMENT AND MANAGEMENT PLAN CONDITION 2.r – DEWATERING PLAN

In accordance with the Connecticut Siting Council's May 14, 2015 Decision and Order (Docket No. 192B, Item 2.r), CPV Towantic, LLC hereby provides a dewatering plan and corresponding narrative in the referenced attachment.

Attached

• Drawing C318, contained in '98132 D&M Plans 6-30-15.PDF'

2(s)

FINAL CONSTRUCTION TRAFFIC ROUTE PLANS.

DOCKET NO. 192B CPV TOWANTIC, LLC CERTIFICATE OF ENVIRONMENTAL COMPATIBILITY AND PUBLIC NEED DEVELOPMENT AND MANAGEMENT PLAN CONDITION 2.s – FINAL CONSTRUCTION TRAFFIC PLAN

In accordance with the Connecticut Siting Council's May 14, 2015 Decision and Order (Docket No. 192B, Item 2.s), CPV Towantic, LLC hereby provides the following information with regard to a final construction traffic plan.

CPV Towantic will work closely with the officials of the Town of Oxford to monitor the impact of construction traffic on normal traffic flow through the town, and to develop plans to mitigate any adverse effects.

Parking space for the construction workforce cars will be provided on temporary laydown areas adjacent to or very near the construction site, as provided for in the Development Agreement between the Town and the Project.

During the initial phases of construction, relatively few workforce cars and trucks will be travelling to and from the site. The traffic is expected to use Christian Street, Jacks Hill Road, Riggs Street and Prokop Road to gain access to Woodruff Hill Road until E. Commerce Drive has been made useable.

On behalf of the Town of Oxford, CPV Towantic plans to construct a new Town-owned road, to be known as East Commerce Drive, which will connect the eastern end of Juliano Drive directly to Woodruff Hill Road. This road was designed as an integral part of the Woodruff Hill Industrial Park and will provide greater access to the approved subdivision area currently under development by the Town of Oxford. The detailed construction plans for East Commerce Drive are complete, and the permit application process is almost complete. It is anticipated that construction of this new road will be completed around the middle of 2016, before the construction labor force and heavy haul material deliveries reach their peak. The use of this new section of road will minimize the need for traffic to travel the Christian Street, Jacks Hill Road and Riggs Street route.

By initiating the workday start at 6:30 a.m., the construction workforce will avoid the "normal" morning peak rush hour traffic that occurs between 7:00 a.m. and 8:00 a.m. A similar situation will occur in the afternoon, with the construction traffic leaving the site area after 5:00 p.m., after the "normal" rush hour period that occurs from 4:00 p.m. to 5:00 p.m.

During the construction period there will be times when the frequency of material delivery trucks is greater than average in order to complete a specific construction activity within a specified time; and also, on occasion, there will be some very large component deliveries. At such times, construction management will notify the appropriate Town officials and local State Police of the proposed truck route and, if necessary, engage the service of a local security force to provide traffic control duty at critical intersections.

In summary, CPV Towantic is committed to ensuring that the construction of the Project is conducted as safely and quietly as possible, and with minimum impact on the neighboring community.

2(t)

FENCE DESIGN AND OTHER SITE SECURITY MEASURES.

DOCKET NO. 192B CPV TOWANTIC, LLC CERTIFICATE OF ENVIRONMENTAL COMPATIBILITY AND PUBLIC NEED DEVELOPMENT AND MANAGEMENT PLAN CONDITION 2.t – SITE SECURITY

In accordance with the Connecticut Siting Council's May 14, 2015 Decision and Order (Docket No. 192B, Item 2.t), CPV Towantic, LLC hereby provides the following information with regard to the site security measures during construction.

During the early phases of construction, temporary barricades and construction safety fences will be incorporated on site in select locations to support initial site work. Also, all construction equipment will be locked and any small hand tools will be kept in connexes.

After completion of initial site civil work and the construction of the site access road, a security gate will be placed at the Project entrance (+/- 24' wide) to block any unauthorized access. The Project will also establish a check in station at the site entrance upon mobilization of the construction trailers. A security guard will be stationed at the entrance gate, with sign-in sheet to control access to the site. As higher-value materials are delivered to the site and or to nearby laydown areas, the Project will coordinate with the Town of Oxford Police as needed to ensure site security. After full site mobilization, the Project will construct a permanent chain link fence, as shown on the attached typical fence detail drawing, to provide full site security for the facility.

Attached

• 'Condition 2.t – Typical Security Fence Detail Drawing.PDF'



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FEDERAL AVIATION ADMINISTRATION LIGHTING DESIGN FOR THE STACKS.

DOCKET NO. 192 CPV TOWANTIC ENERGY, LLC CERTIFICATE OF ENVIRONMENTAL COMPATIBILITY AND PUBLIC NEED DEVELOPMENT AND MANAGEMENT PLAN CONDITION 2.u — STACK LIGHTING DESIGN

In accordance with the Connecticut Siting Council's (the Council) May 14, 2015 Decision and Order (Docket No. 192B, Item 2.u) approving CPV Towantic, LLC's (CPV) Application for a Petition of Changed Conditions to their Certificate of Environmental Compatibility and Public Need which was approved by the Council on June 23, 1999, CPV herewith submits documentation concerning the proposed stack lighting design for the CPV Towantic Energy Center (the Project).

The Federal Aviation Administration (FAA) has completed its review of the Project stacks and issued a Determination of No Hazard to Air Navigation to each. The lighting requirements are the same as those imposed on previous Determinations of No Hazard for the Project. As was previously the case, CPV intends to opt for the installation of a medium intensity flashing white light system in lieu of paint on each of the Project stacks, in accordance with Chapter 3, Paragraph 36.b.¹ Therefore, stack lighting for each of the two 150-foot tall stacks is proposed to include a dual lighting system, with red lights (L-864) for nighttime operation and medium intensity flashing white lights (L-865) for daytime and twilight operation. The system will be installed in accordance with FAA Advisory Circular 70/7460-1K, Change 2, dated 2-1-07.

One level of dual lights will be installed within 20 feet of the stack tops in accordance with the above Circular requirements. Lights will be installed on three sides of each stack with the side facing the other stack without a light. Obstruction lighting will be closely monitored by visual and/or automatic means. Visual inspection of obstruction lighting in all operating intensities will occur at least once every 24 hours on systems without automatic monitoring; an automatic monitor will be used on all structures that are not readily accessible for visual observation. For each structure, a log will be maintained of daily operations status of the lighting system.

The specific lighting for the Project, including for other structures, will be in accordance with and reviewed by the FAA to allow for the minimum lighting possible while providing sufficient visibility for air navigation safety.

A copy of Circular AC No. 70/7460-1K, Chapter 8 – Dual Lighting with Red/Medium Intensity Flashing White Systems, is attached. Also attached is a list of lighting equipment vendors which have been certified by the FAA. (AC 150/5345-53D Appendix 1 Addendum. April 20, 2015). An update of the manufacturer's catalog specifications for the lighting control, provided in the 2001 D&M Plan, has also been provided as an example of the equipment which will be purchased and installed.

Attached

- 'Condition 2.u FAA Updated Chapter 8 Regulations.PDF'
- 'Condition 2.u Updated Manufacturer Specs Lighting Control.PDF'

¹ When medium intensity lighting systems are operated during daytime and twilight on structures 500 feet (153m) AGL or less, other methods of marking may be omitted. When operated 24 hours a day on structures 500 feet (153m) AGL or less, other methods of marking and lighting may be omitted.





9LC Control System

Compliant to: FAA AC 150/5345-43F, ICAO Annex 14, CAR 621.19

Use:

9LC series lighting controls combine the finest in digital circuitry with rugged electromechanical hardware to yield the industry's most comprehensive obstruction lighting controls. Standard models are available for all common FAA and ICAO applications. The 9LCs modular design allows for custom controls for almost any combination of flashing red beacons and sidelights. All models include a NEMA 4 outdoor housing and a calibrated photocell for



automatic day/night switching. A photocell override switch is standard on all systems, facilitation troubleshooting or maintenance. All controls provide comprehensive status indicators and alarm contacts for easy connection to remote monitoring systems.

Features:

- Controls for multiple beacons flash all beacons simultaneously per FAA and ICAO specifications
- Lightning protection provided by:
 - Circuit breaker protection to all tower lighting circuits.
 - MOV surge suppressors on all inputs, outputs, and photocell lines
 - Torroidal current sensors isolate tower lines from monitoring circuitry
- Load balance resistor capability is available
- Modular design allows customization for nearly any application
- Dozens of models already developed for control of up to 14 beacons
- Standard with NEMA 4 enclosures (NEMA 4X optional upgrade)

Alarm Contacts / Control Status

- Individual alarm contacts and control status is provided for:
 - Control power failure
 - Day/night mode status
 - Each flashing red beacon
 - Each level of steady burning obstruction lights
 - Flasher by-pass alarm/status for each beacon
- Number of lamps being monitored can easily changed by setting dip-switches
- Bi-color red/green LED status indicators provide instant indication of alarm and control status
- Normally open and normally closed alarm contacts are both available
- Primary and auxiliary alarm contacts provided



HUGHEY & PHILLIPS

Models - Partial	l listing only – Please	contact Hughey &	& Phillips for more	configurations
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Model #	System	Lighting Type	Structure Height	Input Voltage (50/60Hz)	Beacons	Strobes	Sidelight Levels	LBR Capability
9LCA001000AA	FAA A-0	Incandescent	0 - 150'	120V	0		1	No
9LCA111L00AA	FAA A-1	Incandescent	151' - 350'	120V	1		1	Yes
9LCA233L00AA	FAA A-2	Incandescent	351' - 700'	120V	3		2	Yes
9LCA354L10AA	FAA A-3	Incandescent	701' - 1050'	120V	5		3	Yes
9LCA474L10AA	FAA A-4	Incandescent	1051' - 1400'	120V	7		4	Yes
9LCD111000AA	FAA D-1	Strobe	200' -350'	120V		1		No
9LCD231000AA	FAA D-2	Strobe	351' - 500'	120V		3		No
9LCE111LOBAA	FAA E-1	Inc/Strobe	200' -350'	120V	1	1		Yes
9LCE233LOBAA	FAA E-2	Inc/Strobe	351' - 500'	120V	3	3		Yes
9LCIA06000AA	ICAO A-0	Incandescent	0 - 150'	230V			1	No
9LCIB16L00AA	ICAO A-1	Incandescent	151' - 350'	230V	1		1	Yes
9LCIB26L00AA	ICAO A-2	Incandescent	350' – 700'	230V	2		1	Yes
9LCIC16L00AA	ICAO A-1	Incandescent	151' - 350'	230V	1		2	Yes
9LCID16L00AA	ICAO A-1	Incandescent	151' - 350'	230V	1		3	Yes
9LCR001000AA	FAA A-0	LED	0 - 150'	120V			1	No
9LCR111000AA	FAA A-1	LED	151' - 350'	120V	1		1	No
9LCR231000AA	FAA A-2	LED	351' - 700'	120V	3		2	No
9LCR354000AA	FAA A-3	LED	701' - 1050'	120V	5		3	No



HUGHEY & PHILLIPS, LLC.

FlashGuard[™] 3000B Series Dual Medium Intensity Strobe System

FAA Type: L-864/865 Medium Intensity Lighting ICAO Type: Type A/B Medium Intensity Obstacle Light

ETL Certified:

FAA Advisory Circular 150/5345-43F

Compliant to:

ICAO Annex 14, MIL-C-7989 DGAC of Mexico, CAR 621.19



The FlashGuardÎ 3000B Medium Intensity Dual Lighting System combines a daytime white strobe light and a nighttime red flashing strobe into a single flashhead, eliminating the need for two separate lighting systems. The flashhead is powered and controlled by a power supply that can be mounted remotely at the base of the structure. The power supply constantly monitors the operation of the system, and provides alarm contact closure upon any failure. The system automatically switches between day and night intensities by the use of a calibrated photocell. FlashGuardÎ 3000B flashheads incorporate a light blocking strip that minimizes ground scatter light, resulting in a õcommunity friendlyö lighting system.

Use:

Medium intensity obstruction lighting systems are typically used on structures between 150ø (45M) and 500ø(150M) above ground level to provide aviation safety. The use of a medium intensity white strobe during the daytime typically eliminates the need to paint the structure with aviation orange and white stripes. The use of a red flashing beacon at night provides a õcommunity friendlyö light. Hughey & Phillips medium intensity obstruction lights are designed for lighting tall structures such as communication, television and radio towers, chimneys, cooling towers, tall buildings, catenary river crossings and bridges.

Part Numbers

FG3000B-004	FlashGuard L864/865 Medium Intensity 120/230 VAC 60 Hz
FG3001B-004	FlashGuard L864/865 Medium Intensity 230 VAC 50 Hz



HUGHEY & PHILLIPS, LLC.

System Features:

- Single flashhead provides dual red/white medium intensity operation with no moving parts.
- Dual flashtubes and dual trigger transformers provide night time redundancy no single point of failure in the flashhead
- Precise optics minimize ground scatter light
- Alarm contacts provided for connection to any monitoring system
- Rugged design of flashhead and power supply is suitable for outdoor installation in any climate

Flashhead Features:

- Upper optics provides red flashing beacon lighting
- Lower optics provides medium intensity white strobe lighting
- Identical strobe tube for red and white eliminates extra spare parts
- Internally triggered Xenon strobe tubes utilized for long-life and maximum efficiency, without creating corrosive ozone
- Parabolic reflector/linear strobe tubes optics combination provides very precise optics and blocks ground scatter light in both red and white operation
- Lens raises and locks in place, providing easy access to strobe tubes
- Only five components used in flashhead minimal maintenance required at top of structure
- Dual flashtubes and trigger transformers provide night time redundancy
- Safety interlock switch included
- No moving parts
- High temperature, UV resistant acrylic flashhead lens

Power Supply Features:

- Provides power electronics, timing circuitry, and monitoring for lighting system
- Automatic day/night intensity control
- Manual intensity override
- Easily accessible components
- Plug-in-play circuit cards
- Control and monitoring for up two sidelight levels with four steady burning obstruction lights
- Fail-safe monitoring system with up to five remote alarm contacts
- Stainless steel NEMA 4X enclosure
- Low power consumption



HUGHEY & PHILLIPS, LLC.

Dimensions:



Specifications:

Photometric	Day Mode (White)	20,000 candela \pm 25%
	Night Mode (Red)	2,000 candela ± 25%
	Backup Night Mode (White)	2,000 candela ± 25%
	Beam Spread	3° minimum
	Horizontal Coverage	360°, omni-directional
	Ground Scatter	<3% Light Output at -10° Vertical
	Flash Rate	40 FPM Day & Backup White Night 24FPM Red Night
Environmental	Temperature	-55° to +55° C (-67° F to +130° F)
	Will withstand exposure to	95% relative humidity Wind-blown rain direction Salt-laden atmosphere Wind Speed - 240kph (150mph)
Mechanical	Weight, Flashhead	16 kg (34 lbs)
	Weight, Power Supply	32 kg (70 lbs)
	Power Supply Enclosure	304 Stainless Steel - standard 316L Stainless Steel - optional
	Flashhead Lens Material	High Temp/UV Resistant Acrylic
Electrical	Input Voltages	120, 230/240, 480 VAC
	Input Frequencies	50 or 60 Hz
	Power Consumption, Day	208 Watts
	Power Consumption, Night	133 Watts
	Power Consumption, Backup	77 Watts
	Peak Inrush Current	7A @ 120VAC
	Available Alarm Contacts (form C dry-contact)	Power Failure, Mode Status, Strobe Failure, Sidelight #1 Fail, Sidelight #2 Fail

CHAPTER 8. DUAL LIGHTING WITH RED/MEDIUM INTENSITY FLASHING WHITE SYSTEMS

80. PURPOSE

This dual lighting system includes red lights (L-864) for nighttime and medium intensity flashing white lights (L-865) for daytime and twilight use. This lighting system may be used in lieu of operating a medium intensity flashing white lighting system at night. There may be some populated areas where the use of medium intensity at night may cause significant environmental concerns. The use of the dual lighting system should reduce/mitigate those concerns. Recommendations on lighting structures can vary depending on terrain features, weather patterns, geographic location, and in the case of wind turbines, number of structutes and overall layout of design.

81. INSTALLATION

The light units should be installed as specified in the appropriate portions of Chapters 4, 5, and 6. The number of light levels needed may be obtained from Appendix 1.

82. OPERATION

Lighting systems should be operated as specified in Chapter 3. Both systems should not be operated at the same time; however, there should be no more than a 2second delay when changing from one system to the other. Outage of one of two lamps in the uppermost red beacon (L-864 incandescent unit) or outage of any uppermost red light shall cause the white obstruction light system to operate in its specified "night" step intensity.

83. CONTROL DEVICE

The light system is controlled by a device that changes the system when the ambient light changes. The system should automatically change steps when

the northern sky illumination in the Northern Hemisphere on a vertical surface is as follows:

a. *Twilight-to-Night*. This should not occur before the illumination drops below 5 foot-candles (53.8 lux) but should occur before it drops below 2 foot-candles (21.5 lux).

b. *Night-to-Day*. The intensity changes listed in subparagraph 83 a above should be reversed when changing from the night to day mode.

84. ANTENNA OR SIMILAR APPURTENANCE LIGHT

When a structure utilizing this dual lighting system is topped with an antenna or similar appurtenance exceeding 40 feet (12m) in height, a medium intensity flashing white (L-865) and a red flashing beacon (L-864) should be placed within 40 feet (12m) from the tip of the appurtenance. The white light should operate during daytime and twilight and the red light during nighttime. These lights should flash simultaneously with the rest of the lighting system.

85. OMISSION OF MARKING

When medium intensity white lights are operated on structures 500 feet (153m) AGL or less during daytime and twilight, other methods of marking may be omitted.

2(v)

FULL GEOTECHNICAL STUDY PERFORMED ON LOT 9A PRIOR TO FINALIZING CONSTRUCTION PLANS.

DOCKET NO. 192B CPV TOWANTIC, LLC CERTIFICATE OF ENVIRONMENTAL COMPATIBILITY AND PUBLIC NEED DEVELOPMENT AND MANAGEMENT PLAN CONDITION 2.v – FULL GEOTECHNICAL SURVEY

In accordance with the Connecticut Siting Council's May 14, 2015 Decision and Order (Docket No. 192B, Item 2.v), CPV Towantic, LLC hereby provides the attached geotechnical survey of the 20 acre parcel owned by CPV Towantic, LLC and Lot 9A.

Attached

• '3773-001 FINAL Geotechnical Data Report.PDF'

2(v)

*SEE ATTACHED PDF DOCUMENT FOR COPY OF THE GEOTECHNICAL SURVEY.