

STATE OF CONNECTICUT

CONNECTICUT SITING COUNCIL

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September 9, 2011

Lee D. Hoffman, Esq.
Pullman & Comley, LLC
90 State House Square
Hartford, Connecticut 06103

RE: **DOCKET NO. 225D** - Kleen Energy Systems, LLC Certificate of Environmental Compatibility and Public Need for the construction, maintenance and operation of a Electric Generating Facility and Switchyard on River Road, Middletown, Connecticut.

Dear Attorney Hoffman:

At a public meeting of the Connecticut Siting Council (Council) held on September 8, 2011; the Council considered and approved the Kleen Energy Systems Integrated Contingency Plan (ICP) submitted for this project pursuant to Condition No. 13 of the Council's Docket 225D Decision and Order dated February 8, 2011. Enclosed is a copy of the Council's staff report on this ICP, dated September 8, 2011.

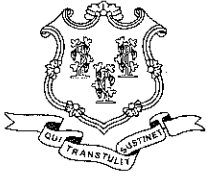
Thank you for your attention and cooperation.

Very truly yours,

Robert Stein *RP*
Chairman

c: Council Members
Parties and Intervenors

Enclosure



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Docket No. 225D

Kleen Energy Systems, LLC

Integrated Contingency Plan

Staff Report

September 8, 2011

On February 8, 2011, the Connecticut Siting Council (Council), in response to the recommendations contained within the Thomas Commission Executive Report of September 21, 2010, modified its Docket No. 225 Decision and Order to require an Emergency Response Plan for the Kleen Energy Systems, LLC (Kleen) facility. Kleen submitted a facility Integrated Contingency Plan (ICP) to the Council on June 28, 2011.

The ICP was developed in accordance with procedures established in a federal guidance document (*The National Response Team's Integrated Contingency Plan Guidance*) that establishes a format for consolidating multiple plans that may be required for a facility into one functional plan. The ICP is organized into three main sections: an introductory section, a core plan, and a series of supporting annexes.

The Introduction section of the ICP provides emergency responders with basic information about the plan and the Kleen facility. The Core Plan contains incident response procedures including recognition, notification, and initial response. The Core Plan is supported by Critical Annexes that contain specific information regarding additional response procedures, facility information, notification procedures, petroleum and chemical inventories, and response equipment inventory. Additional non-critical Annexes are included in the ICP that pertain to incident prevention and planning procedures.

The main emergency response mechanism contained in the Core Plan is the designated Emergency Response Coordinator (ERC) who serves as the Incident Commander (IC). The ERC coordinates emergency assessment and appropriate response actions. In the event the ERC is not available when an emergency occurs, the Control Room Operator will serve as the Acting ERC until the designated ERC assumes control. The ERC will transfer emergency response to the appropriate outside emergency responder. All public safety officials who may assume the role as an IC are trained in the National Interagency Incident Management System.

All facility employees will be trained in the important aspects of the ICP. Exercises and drills are periodically conducted with on-site personnel, applicable environmental consultants, and emergency responders. Changes to the ICP may be made based on the results of these exercises or through the occurrence of an actual incident. Additionally, annual reviews and relevant revisions are performed by an ICP compliance coordinator.

The Council requested comments from numerous state agencies, district legislators, the City of Middletown, the Town of Portland, and the South Fire District. The South Fire District responded on July 7, 2011 expressing concerns about response to a localized fire. Kleen modified the ICP to address these concerns. Kleen will be meeting with the Town of Portland on September 20, 2011 to review the components of the ICP. No other entities responded to the Council's inquiry.