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May 9, 2007

**VIA EMAIL AND HAND DELIVERY**

Daniel F. Caruso  
Chairman  
Connecticut Siting Council  
Ten Franklin Square  
New Britain, CT 06051

**RE: Connecticut Siting Council Petition No. 805 – Ansonia Generation LLC Petition for a Declaratory Ruling that No Certificate of Environmental Compatibility and Public Need Is Required for the Proposed Construction, Maintenance, and Operation of a 58.4-MW Combined Heat and Power Natural Gas-Fired Electric Generating Facility and Transmission Line Tap Located at 75 Liberty Street, Ansonia, Connecticut**

Dear Chairman Caruso:

On behalf of Ansonia Generation LLC (“AnGen”), enclosed are an original and fifteen (15) copies of each of the following:

- Revisions to AnGen’s Petition for Declaratory Ruling, dated March 13, 2007 (to reflect comments from and discussions with the Connecticut Department of Environmental Protection, The United Illuminating Company, the City of Ansonia, and potential construction contractors);
- Water Flow Summary, Water Flow Diagram – Annual Average, and Water Flow Diagram – Summer Maximum Peak (these replace Exhibit 8 of AnGen’s Petition for Declaratory Ruling);
- Drawings entitled “Elevation,” “Floor Plan Layout,” and “Elevation Front and Rear Views” (these drawings replace those attached to AnGen’s response to interrogatory Q-CSC-2, dated April 27, 2007); and
- the resume of Jessica Ferrato of URS Corporation (Ms. Ferrato will be available as a hearing witness for AnGen in lieu of Mr. Dayman and Ms. Posey).

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Please contact me with any questions concerning this filing.

Very truly yours,

**BROWN RUDNICK BERLACK ISRAELS LLP**



Philip M. Small

A handwritten signature in black ink is written over a horizontal line. The signature is stylized and appears to be 'P. Small'.

Enclosures

cc: Service List  
Bartholomew R. Flaherty III, Chairman, City of Ansonia Planning and Zoning Commission  
Peter W. Crabtree, City of Ansonia Zoning Enforcement Officer  
Oswald Ingles, Consultant, City of Ansonia Planning and Zoning Commission

# 40241010 v1 - 026443/0001

**REVISIONS  
TO PETITION FOR DECLARATORY RULING  
OF ANSONIA GENERATION LLC, DATED MARCH 13, 2007**

Ansonia Generation LLC is making the following revisions to its Petition for Declaratory Ruling (the "Petition") to reflect comments from and discussions with the Connecticut Department of Environmental Protection, The United Illuminating Company, the City of Ansonia, and potential construction contractors. These revisions to the original text of the Petition are redlined below.

§ III.B.2, The Facility

Revise the last sentence of the first paragraph of this subsection (page 6 and continuing to page 7) as follows:

It is currently contemplated that this transmission line tap will be installed overhead ~~underground, except for a short overhead portion where it will cross the Naugatuck River.~~

Revise the second paragraph of this subsection (page 7) as follows:

As shown on Exhibit 5, most of the Facility's equipment will be located within the Building. Equipment to be located indoors includes the combustion turbine generator, the steam turbine generator, ~~gas compressor~~, steam turbine condenser, smaller ancillary equipment such as feedwater and condensate pumps, the water treatment system, ~~demineralized water storage~~, sump pumps, motor control centers, and the control room. The gas compressor, which will be enclosed, and demineralized water storage may be located outside the Building. The HRSG is expected to be located largely within the Building, although a portion of the HRSG may extend outside the Building due to the HRSG's length and height. The Facility's ~~stand-alone~~ exhaust stack, which will not exceed a height of 92 feet, will be located either outdoors, adjacent to the Building, or within the Building, in which case it will penetrate the Building roof and will not exceed a height of 92 feet. In addition, the cooling tower will be located outdoors, situated between the Building and the Rod Mill immediately to the west. The switchyard will be located either within or adjacent to the Building.

Revise the third paragraph of this subsection (page 7) as follows:

Penetrations will be required in the Building roof for the combustion turbine air intake, ~~and~~ intake and exhaust cooling for the generators, and possibly the Facility's exhaust stack. Additionally, a portion of the southwest section of the Building wall and roof will need to be removed to allow construction equipment to access the interior of the Building for placement of generating facility components. AnGen will replace the wall and roof in an architecturally compatible manner. The Building's floor will likely require added concrete, and may require pilings, to withstand the additional static and dynamic weight of the turbines, generators, and other rotating equipment.

**REVISIONS  
TO PETITION FOR DECLARATORY RULING  
OF ANSONIA GENERATION LLC, DATED MARCH 13, 2007**

§ III.B.3, Natural Gas Supply

Revise the third sentence of this subsection (starting on page 7) as follows:

During construction, Yankee will replace this on-site 6-inch distribution line with a new ~~12-inch high-pressure line, approximately 500 feet in length, that will be connected to Yankee's existing 12-inch, 250-pound per square inch gauge pressure ("psig") distribution line located beneath North Main Street.~~

§ III.B.5, Switchyard and Transmission Line Tap

Revise the second sentence of the second paragraph of this subsection (starting on page 8) as follows:

This line will run ~~either underground or overhead, based on discussions with the owner of~~ to minimize soil disturbance and to avoid passing under the railroad tracks running through the Site ~~that the interconnection would need to cross.~~

Revise the third paragraph of this subsection (page 9) as follows:

The switchyard's 13.8/115-kV transformer will interconnect to UI's existing Ansonia Substation via a transmission line tap. Ansonia Substation is approximately 1/4-mile southwest of the Site and directly across the Naugatuck River. ~~Except for a short aboveground section for the crossing of the Naugatuck River, i~~It is contemplated that this transmission line tap will be installed ~~underground~~ overhead.

Delete in its entirety the fourth paragraph of this subsection (page 9) as follows:

~~UI has leased two underground duct banks, with a 40-foot easement, between the Naugatuck River and the Ansonia Substation. These duct banks will be utilized to route the 115-kV cable crossing from the edge of the Naugatuck River to the Ansonia Substation. UI plans to have the duct banks available by summer 2007. Each duct bank will be available for two to three 115-kV cables and, therefore, UI will have sufficient space for connecting the Facility.~~

§ III.C.1.b., Traffic Impacts

Revise the second and third sentences of this subsection (page 12) as follows:

A conservative estimate of the off-site truck trips necessary to deliver construction material to the Facility site would be approximately 15 vehicles per day, Monday-Friday during non-school hours for approximately ~~64~~ 78 weeks. Additionally, at its peak, the construction process will employ approximately 60 workers, resulting in approximately

**REVISIONS  
TO PETITION FOR DECLARATORY RULING  
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60 additional vehicle roundtrips per day during the ~~15~~ 18-month construction and start-up period.

§ III.C.1.c., Water Impacts

Revise the last sentence of the second paragraph of this subsection (page 13) as follows:

~~All new structures will be added to the ACB's existing~~ AnGen will also prepare a storm water pollution prevention plan in accordance with ~~ACB's existing the requirements of the~~ DEP Stormwater General Permit.

§ III.C.2.a., Air Emissions and Permitting

Replace Table 4 (page 18) in its entirety with the following:

Table 4: Compliance with Connecticut HAP Regulations

<u>HAP</u>	<u>MASC (ug/m3)</u>		<u>Actual Stack Concentration</u>
	<u>8-hr</u>	<u>30-min</u>	<u>ug/m3</u>
<u>Butadiene (1,3-butadiene)</u>	<u>3.35E+06</u>	<u>1.67E+07</u>	<u>1.76E-01</u>
<u>Acetaldehyde</u>	<u>5.48E+05</u>	<u>2.74E+06</u>	<u>1.63E+01</u>
<u>Acrolein</u>	<u>7.61E+02</u>	<u>3.81E+03</u>	<u>2.62E+00</u>
<u>Benzene</u>	<u>2.28E+04</u>	<u>1.14E+05</u>	<u>4.91E+00</u>
<u>Ethylbenzene</u>	<u>1.32E+06</u>	<u>6.62E+06</u>	<u>1.31E+01</u>
<u>Formaldehyde</u>	<u>1.83E+03</u>	<u>9.13E+03</u>	<u>2.90E+02</u>
<u>Naphthalene</u>	<u>1.52E+05</u>	<u>7.61E+05</u>	<u>5.32E-01</u>
<u>PAH</u>	<u>1.52E+01</u>	<u>7.61E+01</u>	<u>9.02E-01</u>
<u>Propylene Oxide</u>	<u>1.52E+05</u>	<u>7.61E+05</u>	<u>1.18E+01</u>
<u>Toluene</u>	<u>1.14E+06</u>	<u>5.71E+06</u>	<u>5.32E+01</u>
<u>Xylenes</u>	<u>1.32E+06</u>	<u>6.61E+06</u>	<u>2.62E+01</u>

§ III.C.2.b., Water Use and Discharge

Revise the first paragraph of this subsection (page 20) as follows:

When the Facility is operating with 30,000 gpm of steam process flow, the Facility's total process water consumption will be approximately ~~250~~ 256 gallons per minute ("gpm") or ~~360,000~~ 368,000 gallons per day ("gpd"). Process water for the Facility will be supplied by ACB, which currently has a DEP water diversion registration for 4.32 million gpd from the Naugatuck River. The Facility's estimated wastewater discharge will be approximately ~~61~~ 55 gpm or ~~88,000~~ 80,000 gpd. Wastewater will be treated on-Site

**REVISIONS  
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within a portable wastewater treatment unit located within the Building. ~~Excluding cooling tower blowdown (approximately 32 gpm), which is expected to be discharged to the Naugatuck River, It is expected that~~ wastewater will be discharged to the local sewer treatment authority. A water balance diagram for the Facility is attached as Exhibit 8.

§ III.C.2.c., Visual and Aesthetic Effects

Revise the last sentence of this subsection (page 21) as follows:

Similarly, the ~~visibility~~ visual impact of the transmission line tap ~~and on-Site distribution system interconnection~~ will be ~~largely eliminated~~ mitigated by ~~underground routing and~~ aboveground routing that ~~is lower than~~ will be muted by the heights of the surrounding Site buildings.

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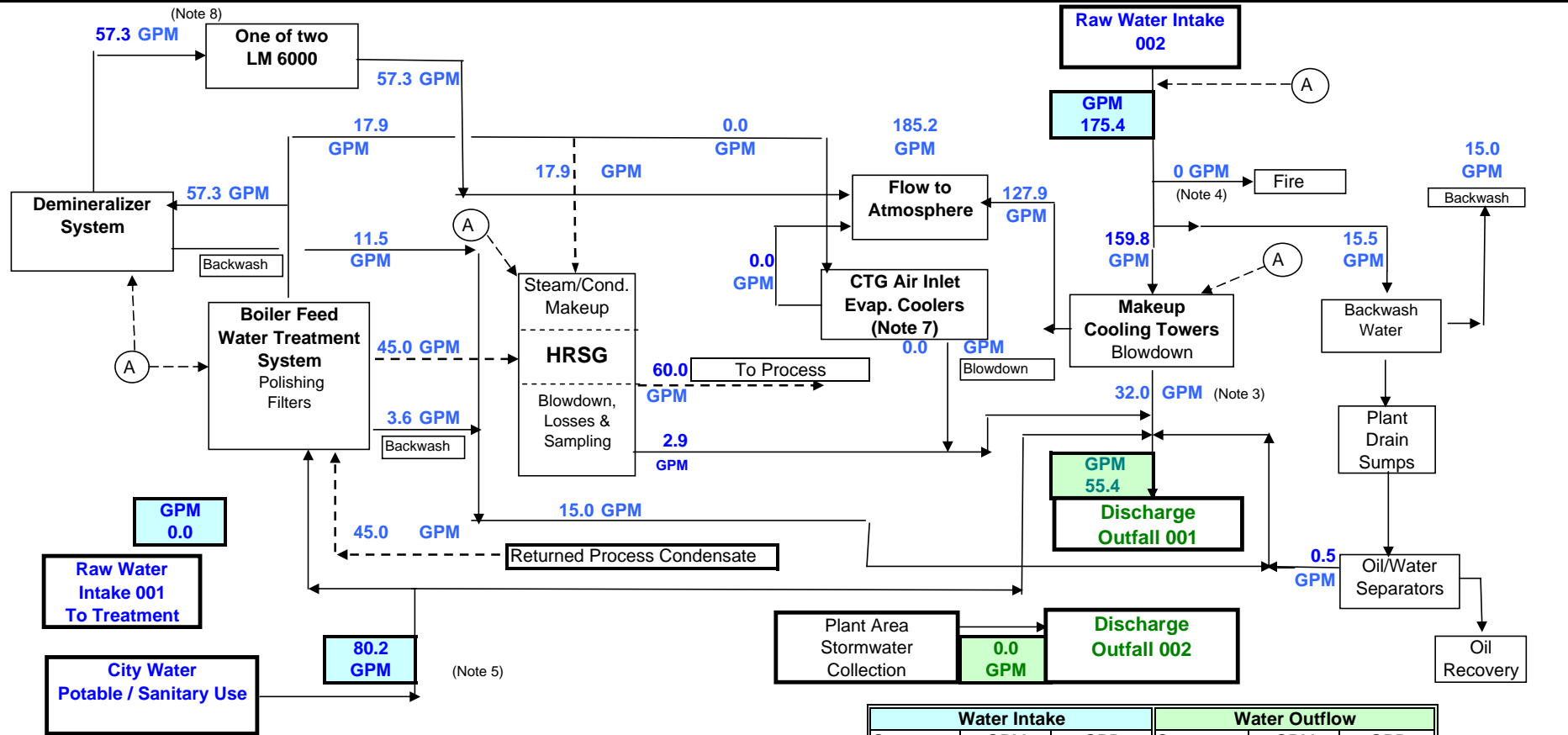
**Ansonia Copper and Brass  
1 x 1 LM 6000PC Sprint Design  
Water Flow Summary**

Case	Notes	Units	1	2
Title	2		Annual Avg	Summer Max
Site conditions		°F / RH	54° F / 60%	92°F / 50% RH
Demin water supply			City	City
Net Plant Output - kW		kW	58,432	51,957
<b>Demin Water Quality from City</b>				
NOx Control	3	gpm	47.0	33.2
Sprint Injection	3	gpm	10.3	14.1
Evap Cooling	3	gpm	0.0	5.4
Process makeup	3	gpm	15.0	15.0
Steam Cycle makeup	3	gpm	2.9	2.7
Potable water	3	gpm	<u>5.0</u>	<u>5.0</u>
Total Demin quality required	3	gpm	<b>80.2</b>	<b>75.5</b>
<b>Water Supply From Canal</b>				
Cooling Tower Make up		gpm	159.8	183.4
Back Wash		gpm	15.0	15.9
Wash down waste		gpm	<u>0.5</u>	<u>0.5</u>
Total River Intake		gpm	175.4	199.8
River Intake "Raw 001"		gpm	0.0	0.0
River Intake "Raw 002"		gpm	<u>175.4</u>	<u>199.8</u>
<b>Total River Intake</b>	1	<b>GPD</b>	<b>252,518</b>	<b>287,731</b>
City Water Intake		gpm	80.2	75.5
Total Water Intake		gpm	255.6	275.3
Total Water Intake		GPD	<b>368,006</b>	<b>396,383</b>
<b>Water Discharge</b>				
Discharge Outfall 001		gpm	55.4	60.8
Discharge Outfall 002		gpm	<u>0.0</u>	<u>0.0</u>
Total Discharge		gpm	55.4	60.8
Total Discharge		<b>GPD</b>	<b>79,753</b>	<b>87,545</b>
<b>Consumptive Water use</b>				
Net Consumptive		gpm	200.2	214.5
<b>Net Consumptive</b>	1	<b>GPD</b>	<b>288,253</b>	<b>308,839</b>

**Rev 01 05/01/07 wds**

1. Gallons per day is based on 24 hour operation at inlet ambient conditions.
2. See notes on water balance tabs for further assumptions
3. Demineralized water supplied from "City" water

**Ansonia Copper and Brass  
1 x 1 LM 6000PC Sprint Design  
Water Flow Diagram - Annual Average**



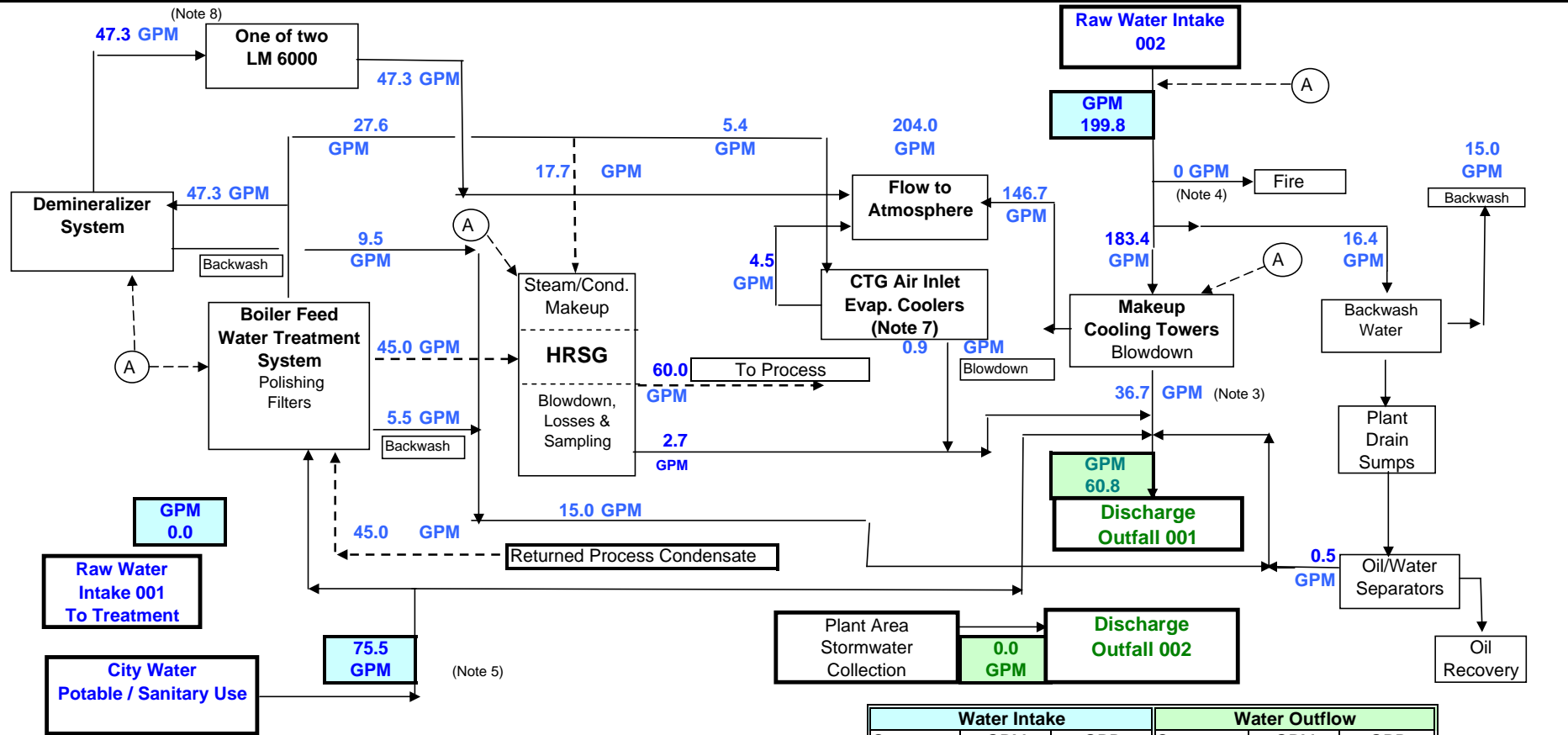
Water Intake			Water Outflow		
Source	GPM	GPD	Source	GPM	GPD
Raw 001	0.0	0	Outfall 001	55.4	79,753
Raw 002	175.4	252,518	Outfall 002	0.0	0
City	80.2	115,488			
<b>Total</b>	<b>255.6</b>	<b>368,006</b>	<b>Total</b>	<b>55.4</b>	<b>79,753</b>

- Notes:
- Summations are ± 0.1 GPM**
- HRSG = Heat Recovery Steam Generator, GTG = Gas Turbine Generator, C = Consumptive Loss
  - Inlet Conditions 54°F and 60% RH with no Evaporative Cooler
  - Evaporative Cooling tower with 5.0 Cycles of Concentration
  - Short term maximum flow rate for fire protection use is 2,000 gpm.
  - Peak flow from municipal supply for drinking water is 5.0 gpm
  - (A) ---> Denotes points of chemical addition
  - Evaporative Cooling during High Ambient Temperature Periods.
  - Water injection for NOx Control 57.3 GPM of demineralized water,
  - Backwash from watertreatment is assumed to be 20.0% of supply
  - Process condensate returned 75.0% Per existing ACB process

Water Flow Diagram		
Ansonia CHP Project Ansonia Copper and Brass Ansonia, CT		
One CTG at 54°F and 30,000 pph Process City Water Supply to Demineralizer		
04/30/07	rev 0 wds 04/30/07	Case 1



**Ansonia Copper and Brass  
1 x 1 LM 6000PC Sprint Design  
Water Flow Diagram - Summer Maximum Peak**



Water Intake			Water Outflow		
Source	GPM	GPD	Source	GPM	GPD
Raw 001	0.0	0	Outfall 001	60.8	87,545
Raw 002	199.8	287,731	Outfall 002	0.0	0
City	75.5	108,653			
<b>Total</b>	<b>275.3</b>	<b>396,383</b>	<b>Total</b>	<b>60.8</b>	<b>87,545</b>

- Notes:
- Summations are ± 0.1 GPM**
- HRSG = Heat Recovery Steam Generator, GTG = Gas Turbine Generator, C = Consumptive Loss
  - Inlet Conditions 54°F and 50% RH with 85% effective Evaporative Cooler
  - Evaporative Cooling tower with 5.0 Cycles of Concentration
  - Short term maximum flow rate for fire protection use is 2,000 gpm.
  - Peak flow from municipal supply for drinking water is 5.0 gpm
  - (A) ---> Denotes points of chemical addition
  - Evaporative Cooling during High Ambient Temperature Periods.
  - Water injection for NOx Control 47.3 GPM of demineralized water,
  - Backwash from watertreatment is assumed to be 20.0% of supply
  - Process condensate returned 75.0% Per existing ACB process

Water Flow Diagram		
Ansonia CHP Project Ansonia Copper and Brass Ansonia, CT		
One CTG at 92°F and 30,000 pph Process City Water Supply to Demineralizer		
04/30/07	rev 0 wds 04/30/07	Case 2

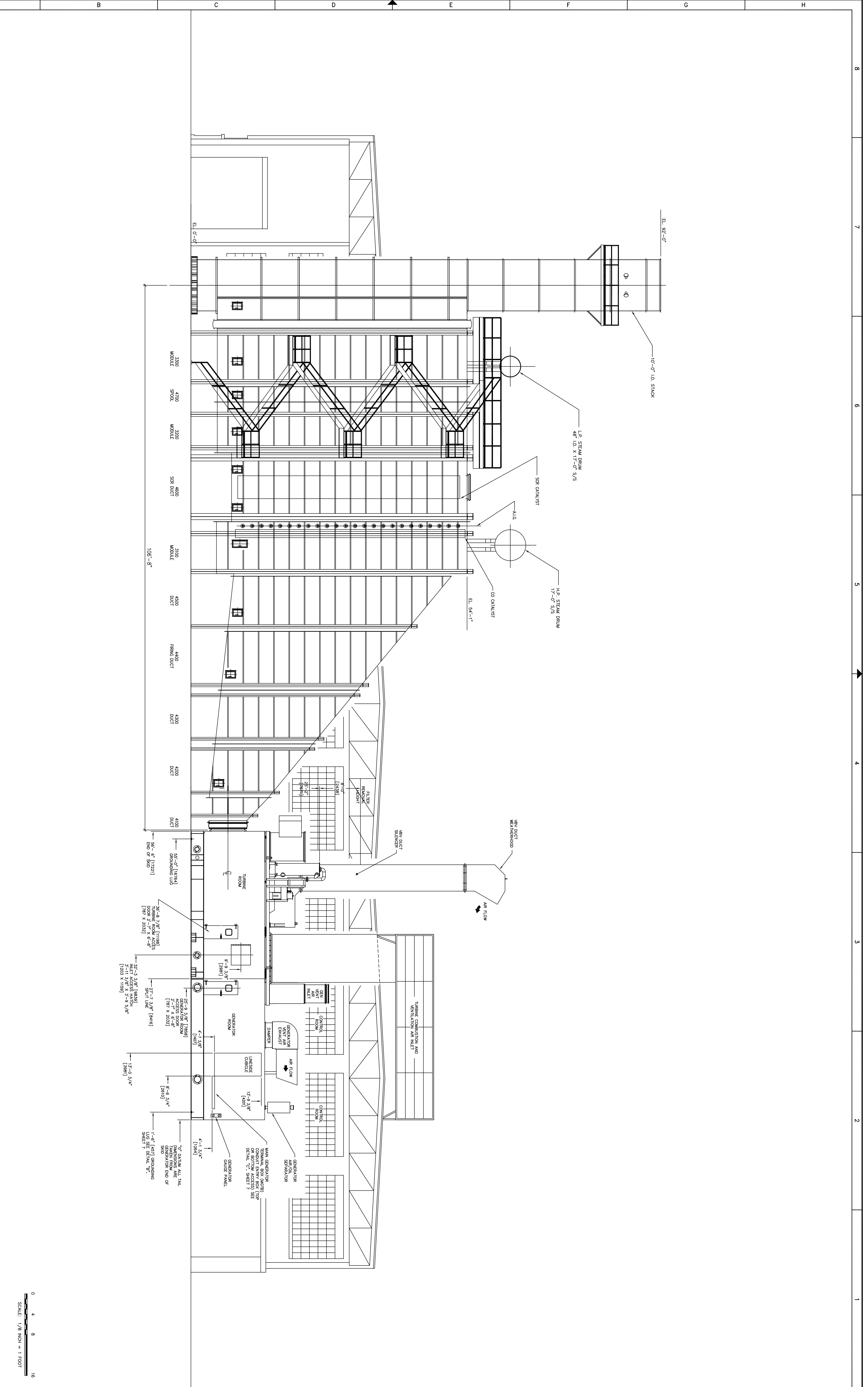
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NO.	DESCRIPTION

**PRELIMINARY**

**URS**  
 335 COMMERCE DRIVE, SUITE 300  
 FT. WASHINGTON, PA 19034  
 (215) 367-2500 FAX (215) 367-1000

ANSONIA GENERATION LLC  
 75 LIBERTY STREET  
 ANSONIA, CONNECTICUT  
 ELEVATION



0 4 8 16  
 SCALE: 1/8" INCH = 1 FOOT

JOB NO.  
 19997229.00011

REVISION

DRAWING NO.

SHEET

REV.	DATE	DESCRIPTION	DRWN.	DES.	CHKD.	APPV.

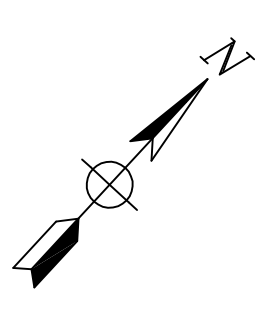
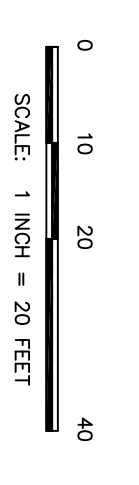
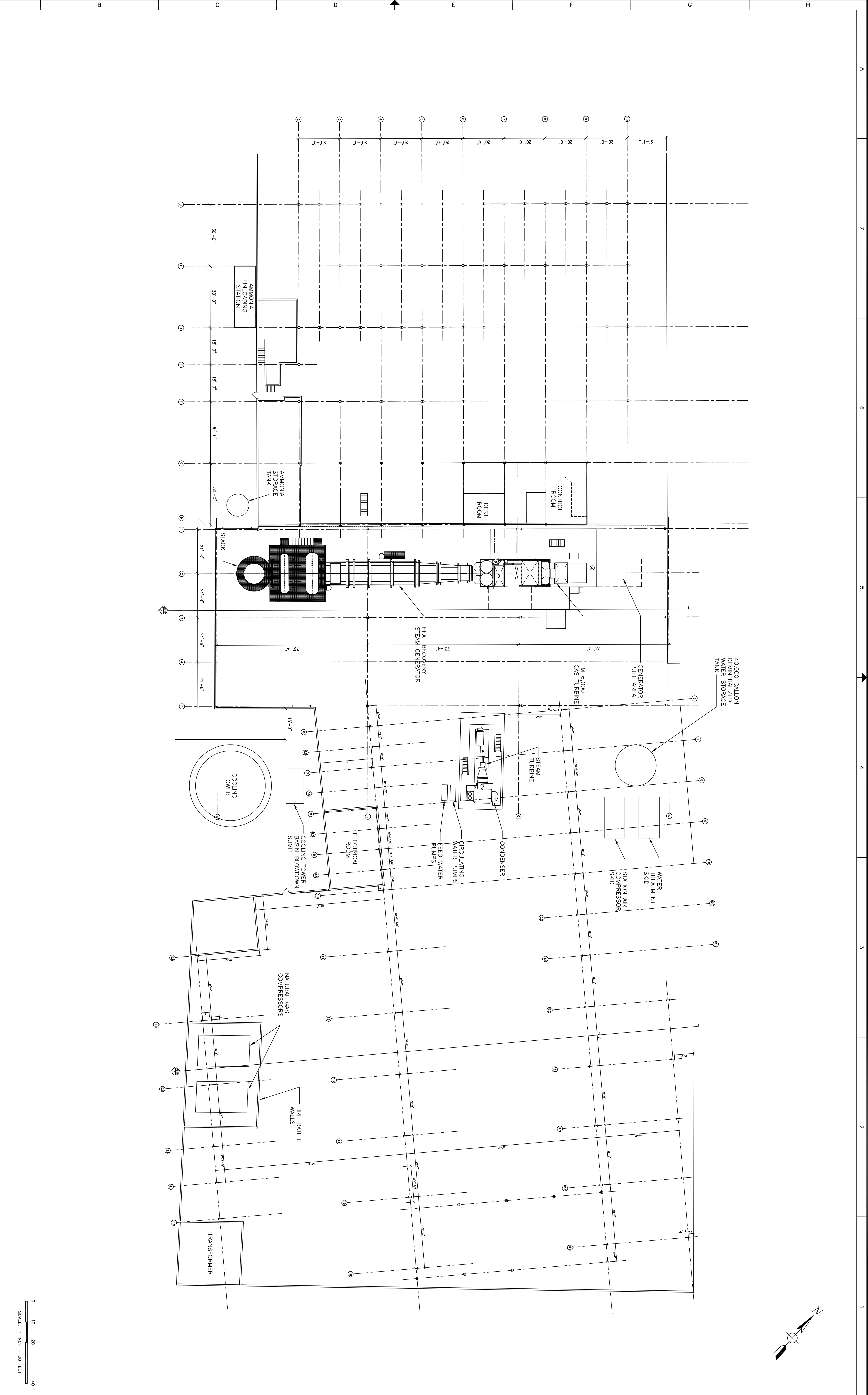
**PRELIMINARY**

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 (215) 367-2500 FAX (215) 367-1000

ANSONIA GENERATION LLC  
 75 LIBERTY STREET  
 ANSONIA, CONNECTICUT

FLOOR PLAN LAYOUT

JOB NO. 19997229.00011  
 REVISION  
 DRAWING NO.  
 SHEET:



REV.	DATE	DESCRIPTION	DRWN.	DES.	CHG.	APPV.

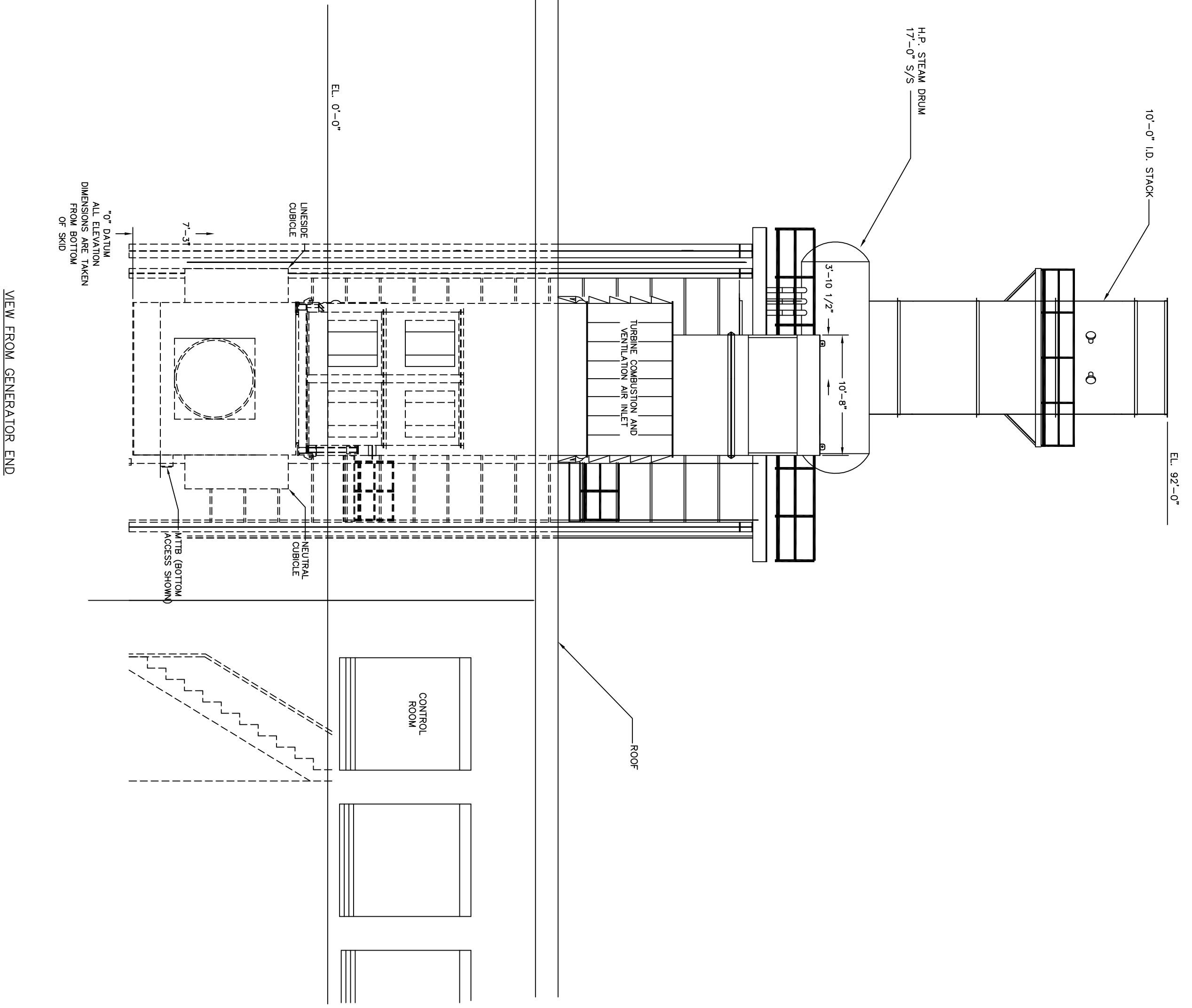
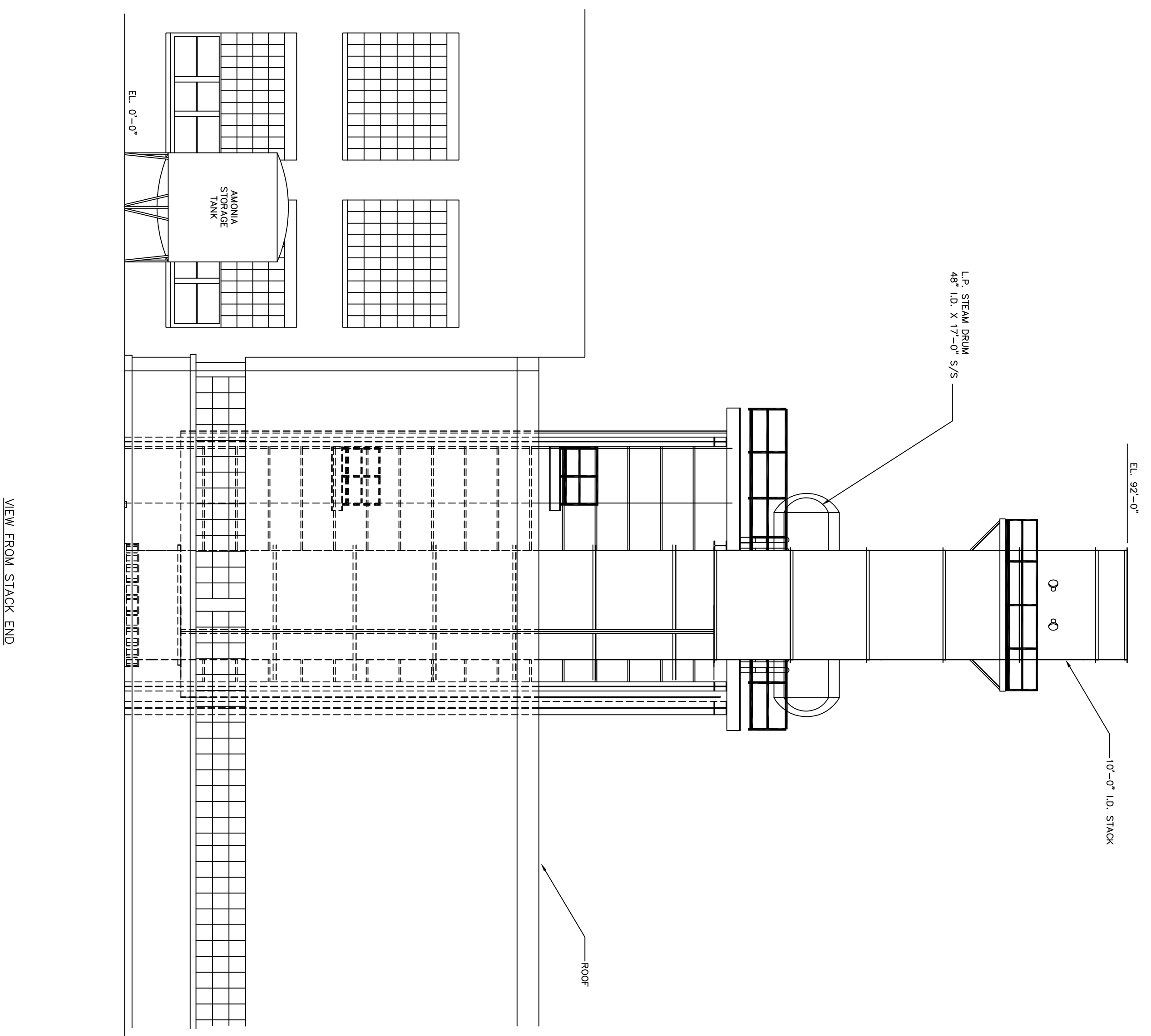
PRELIMINARY

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ANSONIA GENERATION LLC  
 75 LIBERTY STREET  
 ANSONIA, CONNECTICUT

ANSONIA GENERATION LLC  
 75 LIBERTY STREET  
 ANSONIA, CONNECTICUT  
 ELEVATION FRONT AND REAR VIEWS

JOB NO.  
 19997229.00011  
 REVISION  
 DRAWING NO.  
 SHEET



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 SCALE: 1/8" INCH = 1' FOOT



## Jessica Ferrato

*Water/Wastewater Engineer, Aquatic Biologist*

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### Project Specific Experience

#### URS Corporation

- Currently participating in 316(b) projects

#### Vero Fresh Produce

- Developed independently owned business specializing in home delivery of locally grown organic and all-natural produce

#### Nine Springs Permaculture Farm

- Designed and constructed small earthen dam for maximization of oxygenation to lower fish stocking pond
- Designed and constructed wetland to function as secondary outfall to dam and advised on native plant stocking
- Advised on storm and waste water issues
- Conducted soil and water analyses for optimum land use strategy
- Constructed terraces for soil-building and water retention
- Assisted with daily and seasonal farm tasks, including feeding and care of livestock, planting trees and market gardens, building and maintaining raised beds and livestock fencing, pump house maintenance, apiary construction

#### Ohio Environmental Protection Agency

- Reviewed Permit-To-Install applications and engineering plans of sewer and pump station designs for regulatory compliance
- Communicated with submitting engineers by letter and/or telephone regarding any additional terms or project needs, including technical and document requirements as well as mitigation approval
- Wrote agency technical reports for approved PTI applications
- Assisted in site inspections of industrial and construction sites with respect to storm water pollution prevention and waste water treatment NPDES permit compliance

#### EarthDay Coalition

- Provided comprehensive legal analysis of the hierarchy of jurisdiction over Dike 14, an Ohio submerged land and former Confined Disposal Facility (CDF) which has undergone natural succession to migratory bird habitat. Analysis included coverage of federal, state, and regional statutes, regulatory agencies and policies and addressed clean water, toxic waste, wildlife, historical, public planning, and public health concerns.

### Education

Cleveland State University, M.S.,  
Environmental Engineering  
(application pending 2007)

Ohio University, B.S., Marine and  
Freshwater Biology, 1997

### **Case Western Reserve University**

- Through the Department of Biomedical Engineering, participated in Modeling Integrated Metabolic Networks (MIMS), a multi-institutional collaborative and ongoing research project
- Designed network-analysis mathematical computer simulation models of the human metabolic system; compared results with similar models developed by a peer group at a sister institution; shared results with experimental research teams
- Participated in laboratory and modeling/simulation seminars on heart and muscle, brain, and liver metabolism

### **Committee for a Greener Lakewood**

- Developed operating budget and negotiated funds with City of Lakewood mayor
- Developed evaluation criteria for City of Lakewood Go Green Awards; nominated and evaluated area businesses in accordance with criteria
- Wrote public relations material for Committee website and local media
- Presented Go Green Awards, and Committee goals, before Lakewood City Council

### **Schooner Explorations**

- Outfitted and maintained 80-foot gaff-rigged wooden schooner
- Crewed passenger trips under sail in Penobscot Bay and the Florida Keys; led wildlife observations in Penobscot Bay and snorkeling trips in the Florida Keys; operated radio and GPS
- Operated vessel by motor and sail under harsh day and night conditions with Atlantic delivery crew from Camden, Maine to Key West, Florida; interpreted navigational charts and logged multiple daily watches; installed and operated bilge electronics; performed maintenance and repair of diesel inboard engine while underway

### **North Carolina Aquariums at Fort Fisher**

- Administered “Touch Tank” exploratory tidal pool exhibit, including animal handling and feeding and exhibit presentation
- Administered “Reptile Room” herpetology exhibit
- Assisted with educational field trips
  - Surfing and wave formation
  - Exploring tide pools
  - Canoeing the salt marsh
  - Bird watching

### **Franz T. Stone Laboratory**

- Taught ecology workshops to grades 4-12 at a biological field station in Lake Erie
  - Vessel-based lake ecology, field sampling techniques including fish, bottom, plankton, depth, wind speed



Jessica Ferrato

- Field-based bird behavior, water quality assessment and ecological niche, Lake Erie history, edible plants
- Laboratory-based fish identification and morphology using dichotomous keys, fish anatomy & dissection, lake ecology, plankton identification
- Assisted visiting researchers with ongoing studies
  - Effect of zebra mussel infestation on mayfly larvae habitat: collected and prepared study specimens, prepared experimental setup
  - Black snake population study: bagged, tagged, and released study specimens
  - Small boat handling; laboratory management

### **Chronology**

November 2006 – Present/URS Corporation

July 2005 – October 2006/Vero Fresh Produce

March 2005 – May 2005/Nine Springs Permaculture Farm

September 2004 – January 2005/Ohio Environmental Protection Agency

May 2004 – August 2004/Case Western Reserve University

January 2004 – May 2004/EarthDay Coalition (academic credit)

October 2003 – October 2006/Committee for a Greener Lakewood  
(volunteer)

March 1999 – December 1999/Schooner Explorations

May 1998 – September 1998/North Carolina Aquariums at Fort Fisher  
(volunteer)

April 1997 – August 1997/Franz T. Stone Laboratory

### **Contact Information**

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Fax/215.367.1000

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