# Holland & Knight

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Stephen J. Humes 212.513.3474 steve.humes@hklaw.com February 4, 2016

Robert Stein Chairman – Connecticut Siting Council Ten Franklin Square New Britain, CT 06051

> Re: PSEG Power Connecticut, LLC Notice of Exempt Modification Pursuant to RCSA \$16-50j-57(a) Bridgeport Harbor Generating Station Existing Energy Facility Site 1 Atlantic Street, Bridgeport, Connecticut

Dear Chairman Stein:

PSEG Power Connecticut, LLC (PSEG) hereby gives notice to the Connecticut Siting Council (Council) of its intent to undertake a project that qualifies as an exempt modification in accordance with Section 16-50j-57(a) of the Regulations of Connecticut State Agencies (RCSA). The project entails modifications to PSEG's existing Bridgeport Harbor Generating Station (BHS) fuel oil supply tanks and associated equipment.

### **Existing Site**

The existing BHS is near the confluence of the Pequonnock River and Long Island Sound in Bridgeport, Connecticut. Two generating units currently operate at the BHS site with a net (summer rating) capacity of approximately 400 Megawatts (MW). The two units can generate enough power to supply up to approximately half a million residential customers. BHS's two operating units include the coal and oil fired Unit 3 and an oil-fired combustion peaking turbine (Unit 4), supplying power to ISO-New England, which oversees the region's power grid.

### **Proposed Modification**

The proposed modifications will take place within the existing fenced area at BHS, located at 1 Atlantic Street, Bridgeport, Connecticut. The existing facility is located on an approximately 58.8-acre parcel identified as Block 542, Lot 22 on the City of Bridgeport Tax Map. The station coordinates are N 41° 10' 06.22" latitude and W73° 11' 3.44" longitude.

The proposed modification includes the construction of a new Fuel Oil Storage Tank facility to support BHS Unit 3 and the associated truck unloading and pumping facilities. Additionally, the four (4) existing Fuel Oil Storage Tanks will be removed, three (3) smaller underground storage tanks will be removed, and limited site remediation will be conducted in accordance with the

Connecticut Department of Energy and Environmental Protection (CT DEEP) approved Revised Remedial Action Plan dated August 2004. This proposed exempt modification request represents a one-for-one replacement of the fuel oil supply systems for BHS Unit 3. The existing, separate fuel supply for BHS Unit 4 (the combustion turbine) will be unchanged.

The proposed new Fuel Oil Storage Facility is comprised of an approximately 217,000 gallon above-ground Fuel Oil Storage Tank, which will be approximately 34 feet (ft.) in diameter and 32 ft. in height (43 ft. North American Vertical Datum 1988 (NAVD)), with the associated fuel delivery and pumping equipment. The tank will be equipped with an integrated steel secondary containment structure which will be approximately 46 ft. in diameter and 19 ft. 4 inches (in.) high. The containment is sized to be able to fully contain 110% of the tank inventory including stormwater / rain quantities, as required by the applicable CT DEEP regulations. Tank level indications will be provided both locally and in the BHS Unit 3 Control Room on a continuous basis. Local and Control Room level alarms and interlocks will be installed to prevent overfilling of the tank.

The new fuel oil tank will be constructed on a pile-supported reinforced concrete foundation. The fuel oil pump house will be located near the tank, with an approximate footprint of 24 ft. x 40 ft. The pump house will also be constructed on a pile-supported reinforced concrete foundation. A fuel delivery truck unloading area is also proposed, with a footprint of approximately 26 ft. wide by 69 ft. long. Deliveries of fuel oil will be by truck. The truck unloading area and the new fuel oil tank will be connected by approximately 300 ft. of above ground, double wall piping. This piping is in-service and only filled with oil during truck unloading operations.

The Site Plan for the new Fuel Oil Storage Facility is included as Attachment A and Elevation Views are included as Attachment D.

The top of the foundation for the tank and pump house will be at 11 ft. NAVD and the tank, containment and pump building will be flood protected to an elevation of 16 ft. 6 in. NAVD, or 2 ft. 6 in. above the FEMA 1% recurrence interval (100 year) flood level of 14 ft. (Zone AE per FEMA Flood Insurance Rate Map [FIRM] for Fairfield County, Connecticut, Panel 441 or 626; Map Number 09001C0441G Revised July 8, 2013) for the BHS Site.

The 0.2% recurrence (500 year) flood level is not reported on the FEMA FIRM, however those levels can be estimated on the basis of data presented in the FEMA Flood Insurance Study (09001CV001C, Fairfield County, Connecticut, Revised October 16, 2013). The portion of the study that addresses the flood elevations at the site is summarized in Table 10 (page 110) for Transect 47 and the reported 1% recurrence interval stillwater elevation is 9.8 feet NAVD and 12.2 feet NAVD with the effects of wave setup included. On the basis of these computed values, a base flood elevation of 14 feet NAVD was established by FEMA for the area of the site. The reported 0.2% recurrence stillwater flood elevation. The top of the containment and building flood protection wall elevations are 16 ft. 6 in. NAVD, or 2.5 feet higher than the 1% recurrence base flood elevation, as well as above the 0.2% recurrence flood. It is also important to note that the site is located within the zone of no significant wave action (AE), adding additional margin to these values.

The FEMA mapping and flood elevation / recurrence frequencies were modified by FEMA after coastal storm Sandy.

The new Fuel Oil Storage Tank and Pump House will be supported by concrete filled steel pipe piles. Approximately 100 piles will be installed, with an embedment depth ranging from approximately 75 ft. to 100 ft. below the ground surface. Final pile numbers and depth will be determined after detailed geotechnical studies are completed. The foundation loads will be transferred to the piles via poured, reinforced concrete pile caps that will support the tank structures and pump house building. A Connecticut licensed Professional Engineer from the BHS Design Engineering firm, RCM Technologies, has prepared an engineering certification letter, which is included as Attachment B.

The project is necessary to allow the four current Fuel Oil Storage Tanks, as shown in Attachment C, to be removed and the area within the current containment dikes to be remediated in accordance with the appropriate CT DEEP requirements and approvals. Limited remedial activities will occur within the proposed areas of disturbance in accordance with the State of Connecticut cleanup standards, known as the Remediation Standard Regulations.

After the new fuel oil tank is placed in service, PSEG will also remove two existing 15,000 gallon underground storage tanks (USTs) currently used by Unit 3 for initial start-up, and one currently unused 6,000 gallon UST. These three tanks are located on the northern portion of the site, as shown on Attachment C. There are not any currently defined remediation requirements for the area of the USTs, but after removal the area will be inspected to verify that no remediation is necessary. If there are any clean-up requirements they will be completed in accordance with the applicable CT DEEP regulations.

While not part of this project, PSEG is evaluating the potential to construct a new natural gas and Ultra Low Sulfur Distillate (ULSD) fueled combined cycle power plant at the BHS site. The new unit, preliminarily designated as Unit 5, will be bid into the February 2016 New England – Independent System Operator (NE-ISO) Forward Capacity Auction. Initial permitting discussions with various agencies are in progress. If PSEG decides to proceed with this project, PSEG will be filing a separate Petition for Declaratory Ruling with the Council.

### Compliance with RCSA §16-50j-57(b)

The proposed modifications will not have a substantial adverse environmental effect or cause a significant adverse change or alteration in the physical or environmental characteristics of the Facility, in accordance with RCSA §16-50j-57(b), as follows:

- 1. The new Fuel Oil Storage Tank facility, including appurtenant structures such as unloading, access ways and pump house will be located within an interior portion of the BHS site and will be within the area currently fenced off from any potential public accessibility. There are no proposed aspects of the new facility that are outside of the existing site. The proposed new Fuel Oil Storage Facility does not extend the boundaries of the existing BHS Site beyond the existing fenced site perimeter.
- 2. There are no proposed facilities that will exceed the height of the existing Unit 3 equipment, including the adjacent coal conveying systems, the boiler and turbine buildings, and the stack. The new Fuel Oil Storage Tank will be the tallest element of the new Fuel Oil Storage Tank facility, with a height of approximately 32 ft. above the tank foundation, well below the heights of the nearby equipment and the Unit 3 power block.
- 3. Noise levels at the site boundary will not be affected by operation of the proposed facility. The fuel oil transfer pumps will be located in an enclosed building. Operating noise levels are not expected to increase beyond negligible levels and therefore will

not discernibly increase at the site boundary. The noise associated with the new Fuel Oil Storage Facility will not exceed Connecticut or City of Bridgeport regulatory limits. During construction, pile driving will create intermittent noise during a limited portion of the construction timeframe. The increase in noise level resulting from pile driving at the proposed pump building will be readily noticeable at residences along Main Street between Whiting Street and University Avenue, and up to a perceived doubling of loudness at the residences on the east side of Main Street between Henry Street and University Avenue. During pile driving activities associated with the fuel tank, noise levels would be somewhat lower due to distance. Pile driving work will be generally conducted between 8:00 a.m. and 5:00 p.m. on weekdays and is expected to occur over a four to six week period during the summer months of 2016. During activities other than pile driving, construction of the proposed project is not expected to result in perceptible increases in noise level at nearby residences. Traffic, highway and other regional noise sources generally are higher during these time periods and therefore incremental offsite noise impact is expected to be limited.

- 4. A fire detection system will be installed for the new Fuel Oil Storage Tank facility, and the facility will be designed to the appropriate National Fire Protection Association and National Fire Code (NFPA / NFC) Standards. The design and operation of the new Fuel Oil Storage Facility to NFPA / NFC requirements assures that the risks of fire or explosion are minimal.
- 5. The new Fuel Oil Storage Tank, fuel truck unloading area, fuel oil pump house, and associated piping will be added to the existing site spill response plans. The spill response plan will be revised prior to placing the new systems in service. Spill prevention provisions are included in the design, including double wall above-ground piping for the connections between the fuel truck unloading area and the tank / pump house, the aforementioned integrated containment, the containment drainage features which will include engineered petroleum product barriers, and the necessary level monitoring instrumentation.
- 6. The demolition of the four existing fuel oil tanks and the installation of the new Fuel Oil Storage Facility will result in a net environmental benefit for the overall BHS site. The new tank will be used to store light fuel oil (typically No. 2 oil), which is a cleaner burning fuel than the fuel oil stored in the existing tanks, which is No. 6 residual oil. A reduction in Sulfur Dioxide (SO<sub>2</sub>) and fine particulate (PM-2.5) emissions will result. Additionally, the removal of the existing fuel oil tanks and construction of the new Fuel Oil Storage Tank facility will allow previously identified contamination in that portion of the site from historic operations to be remediated in accordance with the applicable CT DEEP requirements.
- 7. Electric and magnetic field levels at the site boundary will not be affected by the proposed facility. The new Fuel Oil Storage Tank facility does not directly generate or transmit electricity and therefore does not change existing electric and magnetic field levels at the site boundary.
- 8. The proposed facility will not impair the structural integrity of the existing facility structures, as documented in Attachment B.

The proposed new Fuel Oil Storage Facility, demolition of the existing four fuel oil storage tanks, and removal of the three USTs will not cause a significant adverse change or alteration in the physical or environmental characteristics of the BHS site.

#### **Other Design Information**

The facility design is based on good engineering practice. All construction will be in accordance with applicable local and state construction standards and conditions of the regulatory approvals to be obtained for the Project. The scope of the construction includes all site preparation, limited remediation (within the footprints of disturbance, as required), installation of subsurface utilities and foundations, installation of the new Fuel Oil Storage Tank facility and required ancillary equipment, including required electrical and mechanical connections. The design and operation of the new Fuel Oil Storage Tank facility will meet the applicable State of Connecticut and City of Bridgeport regulations.

The work will not affect wetlands or waterways. BHS is within the Connecticut Coastal Boundary and is mapped within the 100-year floodplain (Zone AE), but it is not located within a regulated waterway or floodway. The new equipment and structures will be flood protected to above the current FEMA 100-year and 500-year flood elevations. The necessary spill response plans will be developed and the design includes spill prevention measures.

As noted, the installation of the new Fuel Oil Storage Tank facility will be within the fenced perimeter of the existing BHS and the modification does not introduce a significant change in site infrastructure. PSEG has determined that there will be no impact to any state or federal-listed endangered, threatened or species of special concern by either the construction or the operation of the proposed modification. PSEG solicited CT DEEP inputs on potential impacts to any state or federal-listed endangered, threatened or species of special concern for another proposed project at the site. The response from the CT DEEP, dated October 21, 2014 is included as Attachment E. CT DEEP determined that based on "the location and siting of this facility" (i.e. the other proposed project)…"it is unlikely that construction activities and subsequent operations of the facility will negatively impact state-listed species". This review is applicable as the new Fuel Oil Storage Tank facility is significantly smaller than the project that was reviewed, and the location is immediately adjacent to the existing BHS Unit 3 and the other proposed project.

Currently, Unit 3 requires both No. 2 and No. 6 oil to start-up and during certain operating conditions. As start-up is completed, the unit is usually transitioned to combustion of coal. As noted above, the use of No. 6 oil will be eliminated with the completion of the proposed modifications. At the current time, one (1) of the four No. 6 oil tanks that are proposed to be removed is in service. The other three (3) tanks are empty, have been cleaned, and are not inservice.

### Schedule

PSEG intends to install the new Fuel Oil Storage Tank facility and commence demolition of the four existing Fuel Oil Storage Tanks and removal of the three USTs after the Council's acknowledgement that the proposed activity is exempt, and after other approvals are obtained. Construction is proposed to commence in June 2016 and all work is expected to be completed by June 2017.

### Summary

PSEG is requesting the Council's acknowledgement that the proposed project qualifies as an exempt modification in accordance with Section 16-50j-57(a) of the RCSA. The project entails modifications to PSEG's existing BHS fuel oil supply tanks and associated equipment. The

proposed modification includes the construction of a new Fuel Oil Storage Tank facility for BHS Unit 3 and the associated truck unloading and pumping facilities, the removal of the existing Fuel Oil Storage Tanks, and limited remediation of identified contamination within the areas disturbed during construction.

Enclosed with this original submittal are two (2) copies of this Notice of Exempt Modification along with the required filing fee of \$625.00. A written notice has been provided to the Mayor of the City of Bridgeport describing the proposed project.

Please do not hesitate to contact me at (212) 513-3473 should you have any questions regarding this request. We will contact your office in the near term to finalize scheduling of the appropriate reviews.

### Attachments

- A. BPHU3-DWG-014-C-102 General Arrangement Plan
- B. BHS Unit 3 New Fuel Oil Tank Existing Structures Engineering Impact Analysis
- C. BPHU3-DWG-014-C-124 Plant Layout
- D. BPHU3-DWG-014-C-0113 Elevations
- E. October 21, 2014 Natural Diversity Database Review

Sincerely yours,

Holland & Knight LLP

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Stephen J. Humes

SJH/an

cc: Mayor Joseph P. Ganim Leilani Holgado, Esq., PSEG Jeffrey J. Pantazes, AKRF, Inc. Anthony Foster, RCM Technologies



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February 4, 2016

PSEG Fossil LLC 80 Park Plaza, Newark, NJ 07102

Attention: Mr. Donald Sauerborn

Subject: BHS Unit 3 New Fuel Oil Storage Tank Existing Structures Engineering Impact Analysis

Dear Mr. Sauerborn:

RCM Technologies (RCMT) has completed an engineering analysis to determine if the proposed Unit 3 Fuel Oil Tank facility modifications and related activities have an impact on the existing structures within the immediate surrounding area of the construction activities, as required by the Connecticut Siting Council requirements. The scope of the proposed modification includes the new Fuel Oil Storage Tank facility for BHS Unit 3, the associated truck unloading and pumping facilities, the removal of the four (4) existing fuel oil storage tanks, and the associated remediation of the disturbed areas.

#### **Project Description**

The proposed buildings/structures are comprised of the following:

- 1. An above-ground Fuel Oil Storage Tank 34' in diameter and 32' in height with a nominal capacity of 217,000 gallons to be constructed on a pile-supported concrete foundation.
- 2. Pump House with an approximate footprint of 24' x 40' to be constructed on pilesupported concrete foundation.
- 3. Fuel truck unloading rack structure designed as at-grade concrete with a base foot print of approximately 26' wide by 69' long.

The new Fuel Oil Storage Tank and Pump House will be supported by steel pipe piles. The design is based on existing soils data in the vicinity of the site for the new Fuel Oil Tank. Subsequent soil investigations will be conducted prior to construction activities. It is anticipated that approximately 100 piles will be installed, to an approximate depth ranging from 75 to 100 feet. The piles will be installed and foundation loads transferred via poured reinforced concrete pile caps that will support the structures and buildings.



Once the new Fuel Oil Storage facility is completed and placed in service, the four (4) existing above ground fuel oil storage tanks on the site will be removed and the disturbed areas remediated in accordance with the applicable Connecticut Department of Energy and Environmental Protection requirements.

#### Site Description

- 1. The new Fuel Oil Storage Tank and associated structures will occupy an area where there are no existing buildings as shown on the General Arrangement drawing BPHU3-DWG-014-C-102. The new Fuel Oil Facility includes the new tank with an integral containment structure, pump house and truck unloading station.
- 2. Some subsurface utilities are in the truck unloading area such as an electrical line, water line and other unidentified possible utilities. Safety considerations will be implemented to assure worker safety during construction due to subsurface utilities and possible related relocation activities.
- 3. Some subsurface utilities are in the proposed fuel oil tank location such as an electrical duct bank, an 8" fire protection pipe and a 2" oil water separator line. Safety considerations will be implemented to assure worker safety during construction due to subsurface utilities and possible related relocation activities.
- 4. The nearest existing occupied building is the Maintenance Building which is over 217 ft. from the new Fuel Oil Storage Tank (the largest proposed structure).
- 5. The Limit of Disturbance (LOD) for the proposed Fuel Oil Storage Facility is approximately 0.63 acres. The impervious area is approximately 7600 square feet (includes Pump House and Roadway).
- 6. The new Fuel Oil facility will be protected by existing fire hydrants, portable fire control equipment such as standpipes and hose stations and portable fire extinguishers including an emergency shutoff system as well as the assurance that fire related hazards do not spread to existing facilities on site.

## Analysis of potential impact(s) of proposed facility on existing buildings or structures

- 1. The existing BHS facility buildings could potentially be impacted by the new structures in the following ways:
  - a. Vibration-related impacts during construction and operation (primarily associated with pile driving and the use of other heavy equipment).
  - b. Disturbance of the existing operations due to interferences caused by the presence of construction equipment, materials, labor workforce, etc.
- 2. Damaging underground site facilities and utilities.



3. Impacting above-ground cables, structures, pipes, or other visible features.

#### **Construction Methods and Design Measures to Minimize Potential Impacts**

- A formal Health and Safety Plan (HASP) will be developed for all site activities. The construction workforce will be familiar with the potential risks and hazards of working on an existing industrial site, and pre-job briefings will be conducted to assure specific job hazards are understood prior to initiating daily work activities.
- 2. Hager-Richter Geoscience, Inc. performed a geophysical survey in the area of the fuel truck unloading facility area on January 4, 2016 using three complementary geophysical methods: time domain electromagnetic induction (by use of an EM 61 system), ground penetrating radar (GPR), and precision utility location (PUL). An electric line, a water line, and an unidentified possible utility were the only utilities detected in that specified area.
- 3. Additional subsurface soil investigation and borings will be conducted prior to initiation of work. This is focused on the identification of underground obstructions and utilities, whether currently known or unknown. This will provide inputs to the scheduling and the methodology in performing the specific work tasks to avoid these possible jobsite safety and construction challenges. The soil investigation and borings will also be used to finalize the final foundation design. Proper design of the foundations (piles, pile caps, etc.) based on site-specific soils by qualified engineers under the supervision of a Connecticut licensed Professional Engineer will assure that the foundation design is sound and appropriate. In addition, the soil boring data will allow jobsite-specific criteria and design inputs to be established to address and minimize any potential impacts caused by construction related vibration.
- 4. An independent soil testing company will review the existing soil profile for the site and prepare a vibration monitoring plan for engineering review and approval. Vibration monitoring will be conducted during critical construction activities (i.e. those most likely to introduce significant vibrations). A pre-construction survey documenting the existing condition of the structures to be monitored will be performed. The vibration monitoring plan will describe the structures and/or equipment to be surveyed, the monitoring equipment device locations and monitoring frequency. An action limit below the permitted vibration threshold shall be identified to assure that work is stopped if excessive vibration is detected. Modifications to work practices and equipment will be made if necessary to continue the work.
- 5. Disturbance of the existing operation due to the use of equipment, material and labor, will be minimized by scheduling/maintaining standard work practices and methods. Proper foundation and facility design, including the development of site specific construction plans, the establishment of monitoring and observation protocols will minimize the potential for impacts caused by construction activities.



#### Conclusion

Based on the above analysis, implementation of the proper and appropriate engineering design for each aspect of the proposed project, and the implementation of monitoring and observation protocols, RCMT has concluded that with the conduct of preconstruction site investigations (including site geotechnical borings and a rigorous identification of existing underground features and /or obstructions), the proposed Unit 3 New Fuel Oil Tank and associated equipment (including the removal of the existing tanks and the remediation where required) can be installed at the Bridgeport Generating Station without adverse structural, physical or operational impacts to the existing facility.

Very truly yours,

RCM Energy Services Patrick Sposato, P.E. Vice President Connecticut Professional Engineer License No. 19886







7 LAST C.A.D.D. UPDATE:





LAST C.A.D.D. UPDATE:

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Connecticut Department of

## ENERGY & ENVIRONMENTAL PROTECTION

October 21, 2014

Kevin Mahar AKRF, Inc. 307 Fellowship Road, Suite 214 Mount Laurel, NJ 08054

Re: PSEG Power Connecticut, Bridgeport Harbor Unit 5, Combined Cycle Project in Bridgeport Connecticut NDDB 201408872

Dear Mr. Mahar:

Materials pertaining to the above project were forwarded to me for review by the DEEP Natural Diversity Database (NDDB). Their records indicate that state-listed species occur in the vicinity of this proposed project.

Given the proposed upgrades, as well as the location and siting of this facility, it is unlikely that construction activities and subsequent operations of the facility will negatively impact state-listed species.

Natural Diversity Database information includes all information regarding critical biological resources available to us at the time of the request. This information is a compilation of data collected over the years by the Department of Energy and Environmental Protection's Natural History Survey and cooperating units of DEEP, private conservation groups and the scientific community. This information is not necessarily the result of comprehensive or site-specific field investigations. Consultations with the Database should not be substituted for on-site surveys required for environmental assessments. Current research projects and new contributors continue to identify additional populations of species and locations of habitats of concern, as well as, enhance existing data. Such new information is incorporated into the Database as it becomes available.

This is a preliminary site review and is not a final determination. A more detailed review may be conducted as part of any subsequent environmental permit applications submitted to the DEEP for the proposed site. Please be advised that should state permits be required or should state involvement occur in some other fashion, specific restrictions or conditions relating to the species discussed above may apply. In this situation, additional evaluation of the proposal by the DEEP Wildlife Division should be requested and species-specific surveys may be required. If the proposed project has not been initiated within one year of this Wildlife Division review, you should contact the NDDB for an updated review.

If you have any additional questions, please feel free to contact me at <u>Laura.Saucier@ct.gov</u>, please reference the NDDB number in the subject line of this letter when you e-mail or write.

Sincerely,

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Laura Saucier Wildlife Biologist

Wildlife Division, Sessions Woods WMA, Post Office Box 1550, Burlington, CT 06013 (860) 675-8130, www.ct.gov/deep Affirmative Action/Equal Opportunity Employer