STATE OF CONNECTICUT
CONNECTICUT SITING COUNCIL
Ten Franklin Square, New Britain, CT 06051
Phone: (860) 827-2935 Fax: (860) 827-2950
E-Mail: siting.council@ct.gov
Web Site: portal.ct.gov/csc

VIA ELECTRONIC MAIL

May 9, 2023

Bruce L. McDermott, Esq.
Murtha Cullina LLP
265 Church Street
New Haven, CT 06510
bmcdermott@murthalaw.com

RE: **PETITION NO. 1372** – Derby Fuel Cell, LLC declaratory ruling, pursuant to Connecticut General Statutes §4-176 and §16-50k, for the proposed construction, maintenance and operation of a 14.0-megawatt fuel cell facility, associated equipment and related site improvements to be located at 200 Roosevelt Drive, Derby, Connecticut.

Dear Attorney McDermott:

The Connecticut Siting Council (Council) is in receipt of the notification for pipe cleaning procedure dated May 5, 2023 regarding compliance with Condition No. 6 of the Council's Declaratory Ruling of July 19, 2019 for the above-referenced facility.

The Council acknowledges that the condition has been satisfied. This acknowledgment applies only to the condition satisfied by the May 5, 2023 correspondence.

Please be advised that deviations from the standards established by the Council in the Declaratory Ruling are enforceable under the provisions of Connecticut General Statutes §16-50u.

Thank you for your attention and cooperation.

Sincerely,

Melanie A. Bachman
Executive Director

MB/MP

BRUCE L. MCDERMOTT
203.772.7787 DIRECT TELEPHONE
860.240.5723 DIRECT FACSIMILE
BMCDERMOTT@MURTHALAW.COM

MURTHA CULLINA
ATTORNEYS AT LAW

May 5, 2023

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

Re: Petition No. 1372 – Derby Fuel Cell, LLC petition for a declaratory ruling, pursuant to Connecticut General Statutes §4-176 and §16-50k, for the proposed construction, maintenance and operation of a 14.0-megawatt fuel cell facility and associated equipment to be located at 200 Roosevelt Drive, Derby, Connecticut

Dear Ms. Bachman:

Pursuant to Condition 6 of the Connecticut Siting Council's ("Council") July 19, 2019 decision in the above-referenced petition, FuelCell Energy, Inc. (the "Company") hereby submits to the Council the attached pipe cleaning procedures. The procedures set forth the methods and medias to be used to clean the natural gas piping at the Company's Derby project. No known hazards are associated with the process. The pipe cleaning will be performed on May 19, 2023 by Notch Mechanical Constructors under the supervision of Philip Neveu.

I certify that notice regarding the pipe cleaning operations has been given to all state agencies listed in Connecticut General Statutes Section 16-50j(h) as well as the Department of Consumer Protection, Department of Labor, Department of Public Safety, Department of Public Works and the Department of Emergency Management and Homeland Security

Should the Council have any questions regarding this filing, please do not hesitate to contact me.

Very truly yours,

Bruce L. McDermott

Enclosure

MECHANICAL CONSTRUCTORS
PIPE FITTERS | PLUMBERS | CODEWELDERS
85 LEMAY STREET | CHICOPEE MA 01013-2236
TEL: 413-534-3440 | FAX: 413-534-4111 | notch.com
NOTCH

May 3, 2023

Job: FCE Derby CT

Location: 200 Roosevelt Drive, Derby, CT 06418

Re: FCE Derby - Natural Gas Pipe Cleaning Procedure

Description:

This document outlines the procedure for safely cleaning the natural gas piping installed between the hand valve HV-600 and the branch isolation ball valves.

Notes:

- Before cleaning operations commence, the natural gas piping will be pressure tested and signed off on.
- A mechanical air blower will be used for the blowing operations in this procedure.

Personal Protective Equipment:

- ANSI-approved Hard Hat
- Eye Protection
- Face Shield
- Hearing Protection
- Hand Protection
- Safety Toed Footwear
- Personal oxygen monitors

Roles and Responsibilities:

Attendant:

1) During the blowing procedure an attendant will be monitoring the perimeter of the danger-taped area.
2) The attendant's responsibilities shall be to ensure;
    a. That no unauthorized vehicle or pedestrian traffic enters the restricted area.
    b. To communicate with the person performing the blowing of the system.

Notch Operations:

1) Training:
    a. Crew Members whose duties fall within the scope of this procedure shall be provided training that is consistent with the scope of their job activities.
    b. Personnel will be trained in proper use and maintenance of Personal Protective Equipment that will be utilized in this procedure.

c. Personnel training shall be conducted by a competent person knowledgeable in the subject matter.

2) Emergency response:
In the event of an emergency, while working on the Project site, the emergency phone number is 911. All site personnel will be evacuated to a pre-determined location. Emergency response planning will follow in accordance with 29 CFR 1910.38(a). The Derby, CT Fire Department will be utilized to respond to emergency situations.

3) Pre-Emergency Training:
Another task in emergency planning efforts will be to designate appropriate emergency escape routes and safe places of refuge for the site activity areas. These designations may change on a daily basis due to factors such as wind direction, the type and extent of emergency situation warranting the need for evacuation, among others. The Safety Coordinator or Supervisor will identify any changes in escape routes and refuge points and will discuss them with crew members.

4) Procedures to Account for Site Personnel:
Accounting for personnel will be accomplished through the requirement that all personnel on-site sign in and out each day. During an emergency, personnel will immediately evacuate the work area and proceed to the muster points.

5) Notifications:
All Contractors working on site including Fuel Cell Energy will be notified prior to the commencement of this procedure.

6) Rescue and Medical Duties:
A physician-approved first aid kit, an eyewash station, and Class ABC fire extinguishers will be available on-site. Only adequately trained site personnel will be authorized to participate in emergency rescue operations.

7) Activation of Emergency Response Procedures:
The following situations would classify as emergency situations:
Overexposure to hazardous materials, direct exposure to a chemical, trauma injuries (broken bones, severe lacerations/bleeding, burns), eye/skin contact with hazardous materials, loss of consciousness, and cold stress (hypothermia). heat stress (heat stroke), heart attack, respiratory failure, and allergic reaction.
Emergency services will be notified immediately in the event of an emergency. The emergency contacts are listed:

Local Agencies:

Ambulance: 911

Fire: Derby, CT – 911, (203) 732-1963

Police: Derby, CT – 911, (203) 735-7811

Notch Personnel:

Project Manager: Philip Neveu P.E., (413) 374-8341

Site Supervisor: Nicholas Papotto, (860) 817-8813

General Supervisor: Michael Forest, (413) 427-0134

Safety Coordinator: Jennifer Lee, (413) 459-7301

VP of Operations: Douglas Neveu, (413) 427-4015

Fuel Cell Energy:

Project Manager - Stephen Mizia, (203) 446-7990

8) Fire Control:

   Smoking/Tobacco products will not be allowed anywhere within the Fuel Cell construction project on the test day.

9) Work Stand-Down Procedure:
   The Site Supervisor shall brief personnel on the instructions below regarding valve closures to be acted upon in the event of a call for "Stand-Down" during the blowing procedure.
   - In the case of a stand-down call during the blowing closing HV-600 will stop the flow of air.

10) Emergency Recognition and Prevention:
    Because unrecognized hazards may result in emergency incidents, it will be the responsibility of the NOTCH PM, NOTCH supervisors, and NOTCH safety coordinator through daily site inspections and employee feedback (weekly safety meetings, and job safety analyses) to recognize and identify all hazards that are found at the site. These may include:

- Chemical Hazards
- Materials at the site
- Materials brought to the site Physical Hazards Fire/explosion Slip/trip/fall
- Electrocution
- IDLH atmospheres (Immediately Dangerous To Life or Health)
- Excessive noise
- Cold, Heat, Ecological
- Mechanical Hazards, Heavy equipment, Stored energy system
- Pinch points, Electrical equipment, Vehicle traffic
- Environmental Hazards Electrical Storms High winds
- Heavy Rain/Snow
- Temperature Extremes (Heat/Cold Stress)

Supervisor:

1) Hazards:
   - Lack of Communication
   - Non-compliance
   - Energized Equipment
   - Unauthorized work
2) Controls:
   - Inform the crew members of Lockout/Tagout at the gas main supply to the site.
   - Plan the work involving personnel responsible for preparation (such as isolation, depressurization, draining, venting, flushing) of equipment/system to be purged.
   - Ensure the equipment/system to be purged is positively isolated from all sources of energy (hydraulic, pneumatic, electrical, etc.)
   - Use proper locks and tags for isolation.
   - Ensure the equipment/system is depressurized and content is drained safely.
   - Arrange mechanical air blower at the entrance of natural gas pipe.
   - Ensure the deployment of air does not create a hazard for the site.

Crew Members:

1) Hazards:
   - Lockout/Tagout
2) Controls:
   - Ensure the tools (such as the air blower) to be used are free from defects.
   - Barricade the area and post a warning notice.
   - Ensure the disposal of purged air volume is in a safe location.

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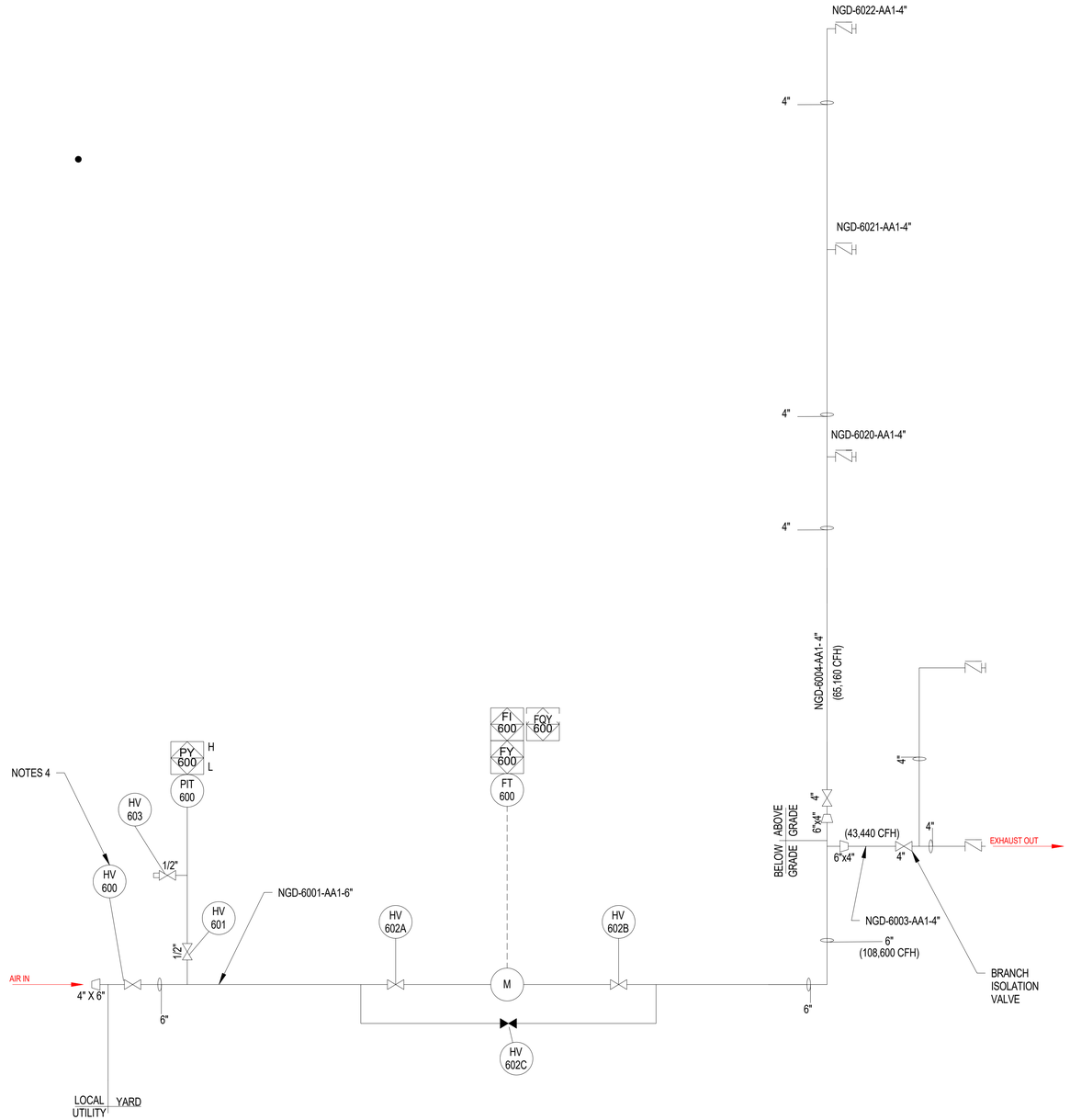
85 LEMAY STREET | CHICOPEE MA 01013-2236
TEL: 413-534-3440 | FAX: 413-534-4111 | notch.com

Natural Gas Pipe Blowing Procedure:

1) Before cleaning, all gas piping will have been tested and signed off on.
2) The local utility gas line will be locked out and tagged out on the letdown spool.
3) HV-600 will be disconnected from the let-down spool.
4) HV-600 will be utilized as the connection point for the mechanical air blower and will allow for quick shut off of all airflow through the gas pipe.
5) HV-600 will be shut, locked out, and tagged out for the following operations until blowing commences.
6) The natural gas pipe will be disconnected from the fuel cell skids at their branch isolation ball valves.
7) Blind flanges will be installed on ball valves for four of five fuel cells.
8) A deflector will be installed on the open ball valve to direct any debris from the pipe exit to the ground.
9) Danger tape will be installed around the perimeter, a 30ft radius from the discharge location.
10) All non-essential personnel are prohibited from entering the cordoned-off areas during this procedure.
11) All workers involved in this work will attend a pre-procedure briefing where this procedure will be reviewed.
12) Hand Valve HV-600 shall now be fully opened to allow the blow.
13) Steps 7 through 12 will be repeated for each of the ball valves until each of the isolation branches has been cleared of debris.
14) At this point the blind flanges may be removed and the spools may be reconnected.
15) Once the piping has been cleared of debris and refastened to the local utility and fuel cell skids the Gas Utility LOTO may be removed.
16) After cleaning is complete the 6”, 4” and 3” lines will be filled with nitrogen and left pressurized at 2-5psi as outlined in NFPA 54-8.3.1.2. The 6”, 4” and 3” lines will be purged in accordance with NFPA 54-8.3.2.1 “Placing in Operation” as indicated by FCE during the fuel cell startup.
17) The strainer and additional piping spools will be hand cleaned and inspected prior to the commissioning of the system.



NOTES:

1. CLOSURE TIME 1 SECOND OR LESS.
2. SAFETY SHUTOFF VALVES PER FC 1 (AMERICAN NATIONAL/CSA AMERICAN STANDARD FOR STATIONARY FUEL CELL POWER PLANTS). VALVE TYPE TO BE BURNER SHUTOFF VALVE.
3. PROCESS CONNECTIONS SUPPLIED FOR PURGE PROCEDURES, INSTRUMENT CALIBRATION, PROCESS SAMPLINGS AND PRESSURE READINGS.
4. VALVE ACCESSIBLE FROM GRADE.
5. LOCATE AT LOW POINT IN PIPE.
6. H.C. TO BE "DRYLOCK" FITTING.
7. THE FOLLOWING VALVES ARE TO BE PROCURRED AS LOCKABLE. THEY ARE AS FOLLOWS: HV-600.
8. MECHANICAL CONTRACTOR TO PROVIDE SHUT OFF VALVE AT EACH DEDICATED LINE TO EACH FUEL CELL.
9. MECHANICAL CONTRACTOR TO SUPPLY ALL MATERIALS, LABOR, AND EQUIPMENT TO INSTALL GAS SUPPLY TO EACH PLANT.
10. MECHANICAL CONTRACTOR IS RESPONSIBLE FOR ALL BLOWDOWN, PURGING, PRESSURE TESTING, ETC. NECESSARY FOR GAS PIPING.

PROJECT DESIGNER

ELM
POWERING PRODUCTIVITY
68 UNION STREET
WESTFIELD, MA
01085
P: (413) 568-0905
F: (413) 562-0407
50 D'ANGELO DRIVE
BUILDING ONE, SUITE #4
MARLBOROUGH, MA 01752
P: (508) 480-9300
www.elmelec.com

PROJECT DESIGNER

NOTCH
MECHANICAL CONSTRUCTORS

CONSULTING ENGINEER

PROFESIONAL SEAL

DRAWING ORIENTATION

NOTES/COMMENTS

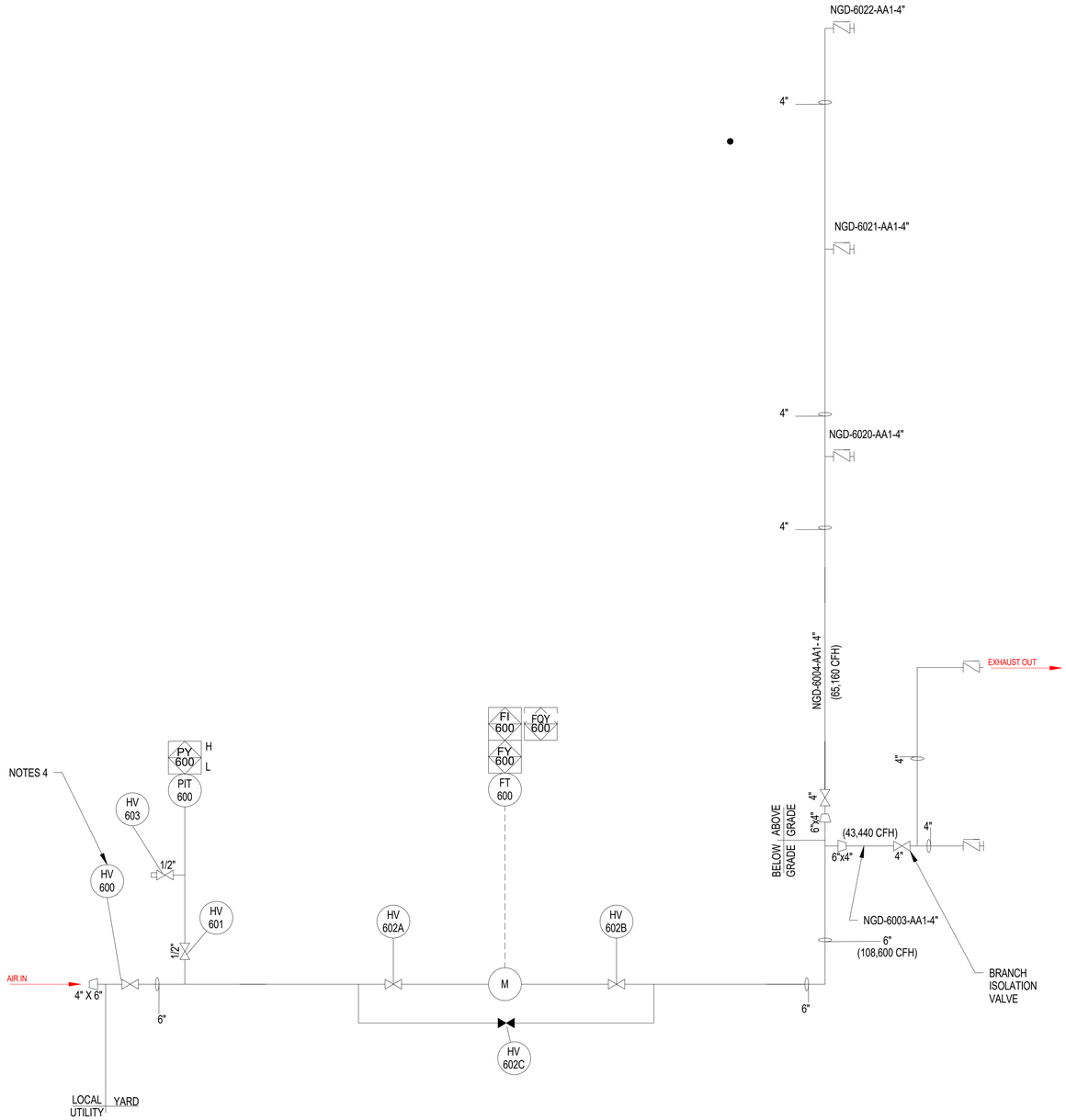
No.	Description	Date

FUEL CELL DERBY

MM-45 Blowout

PROJECT NUMBER	12835
DATE	05/03/23
DESIGNED BY	DD
CHECKED BY	JC
	F-105
SCALE	No Scale

PLOT DATE: 5/4/2023 2:13:53 PM



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01085
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DRAWING ORIENTATION

NOTES/COMMENTS

No.	Description	Date

FUEL CELL DERBY

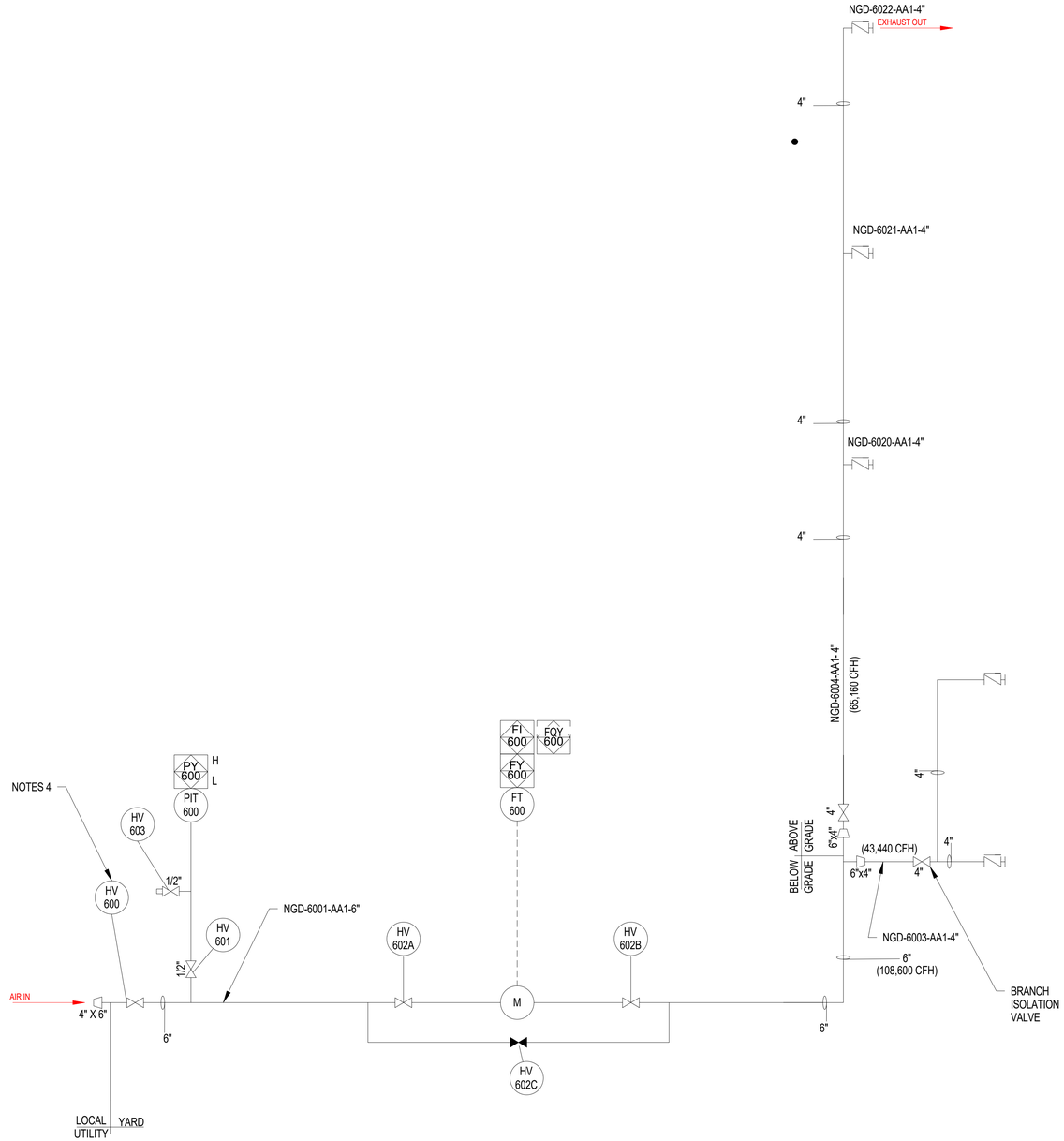
MM-46 Blowout

PROJECT NUMBER	12835
DATE	05/03/23
DESIGNED BY	DD
CHECKED BY	JC

F-106

SCALE: No Scale

PLOT DATE: 5/4/2023 2:13:57 PM



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DRAWING ORIENTATION

NOTES/COMMENTS

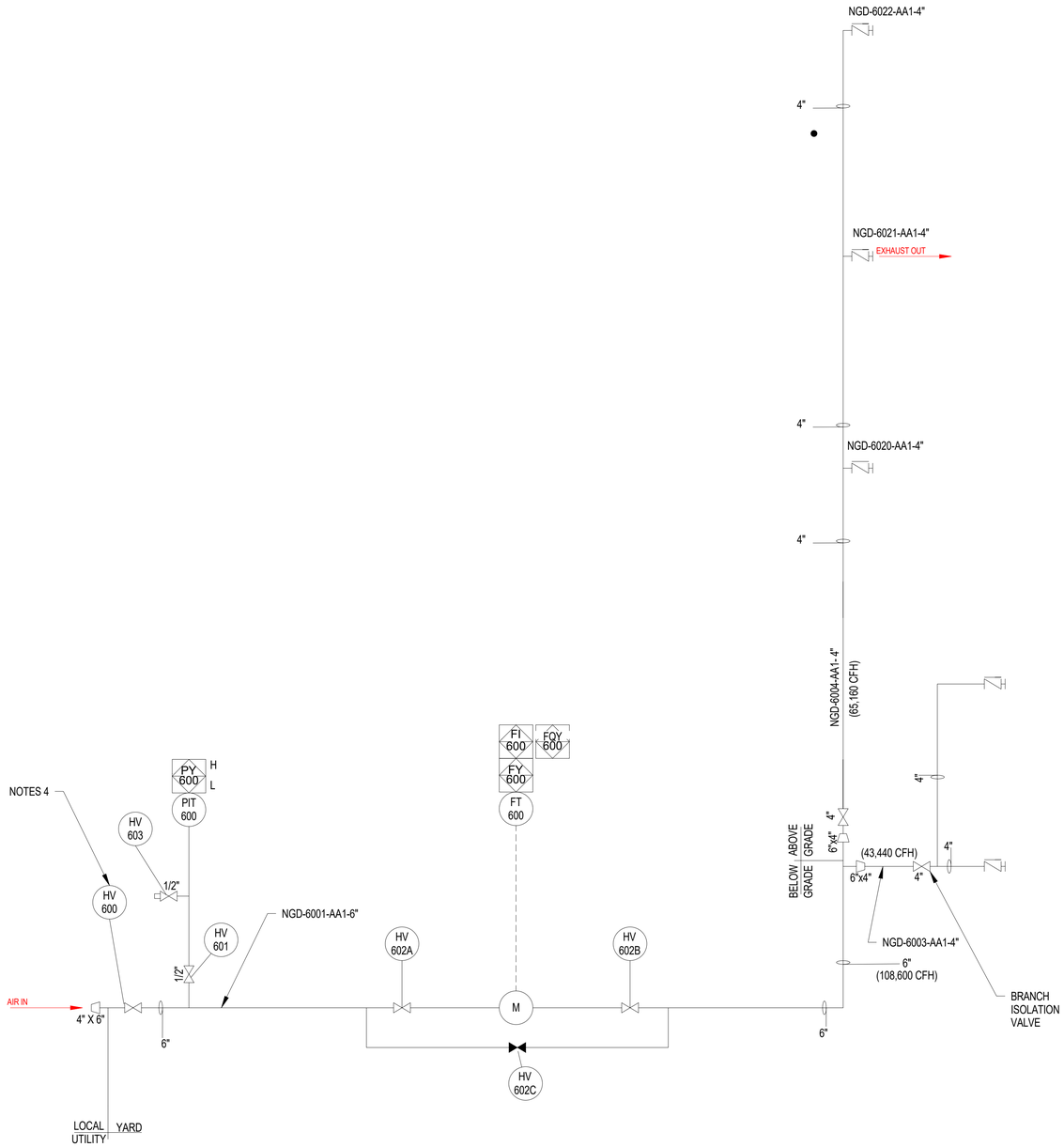
No.	Description	Date

FUEL CELL DERBY

MM-47 Blowout

PROJECT NUMBER	12835
DATE	05/03/23
DESIGNED BY	DD
CHECKED BY	JC
F-107	
SCALE	No Scale

PLOT DATE: 5/4/2023 2:14:07 PM



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DRAWING ORIENTATION

NOTES/COMMENTS

No.	Description	Date

FUEL CELL DERBY

MM-48 Blowout

PROJECT NUMBER	12835
DATE	05/03/23
DESIGNED BY	DD
CHECKED BY	JC
	F-108
SCALE	No Scale

PLOT DATE: 5/4/2023 2:14:15 PM

NOTES:

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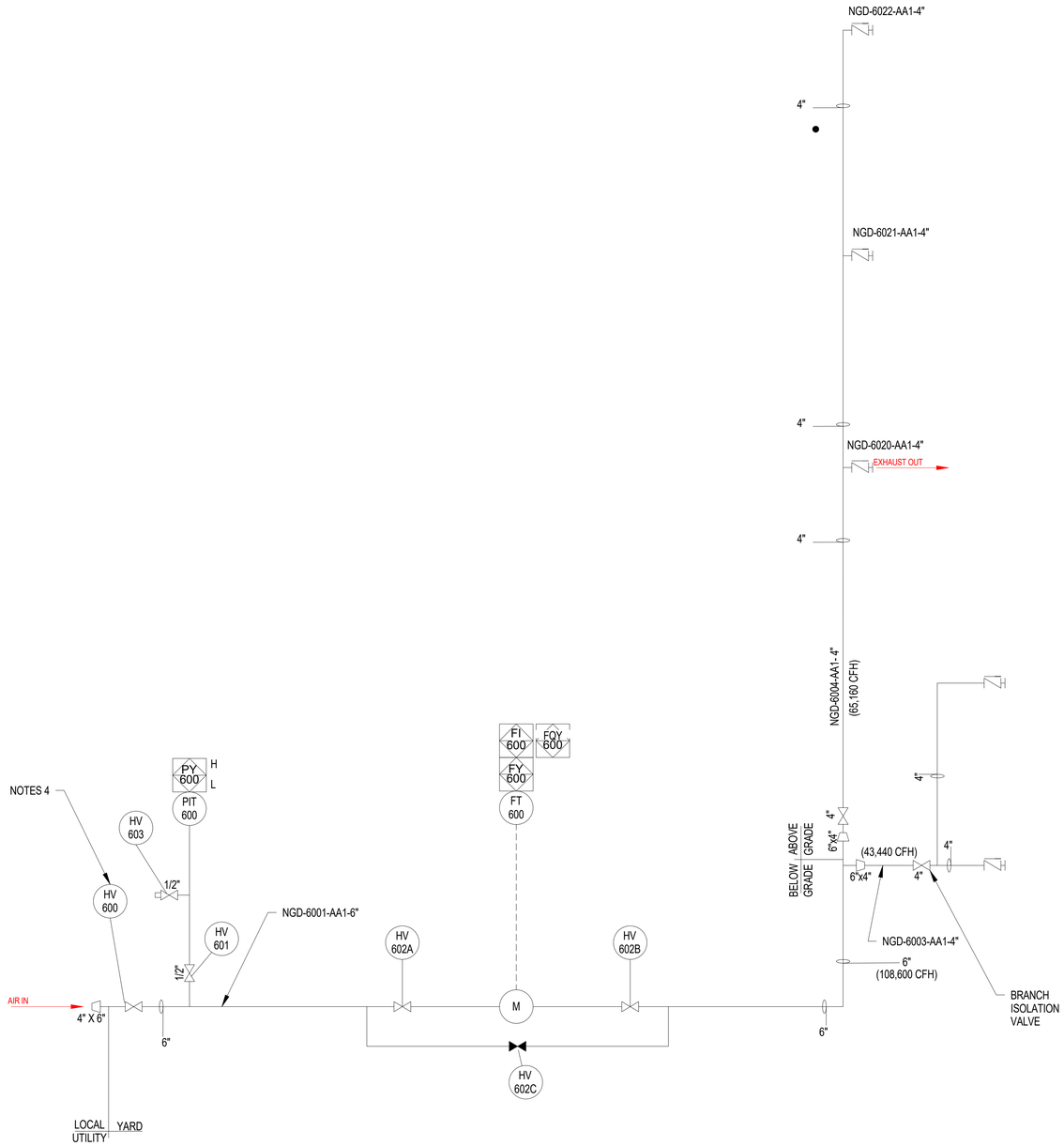

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NOTES/COMMENTS

No.	Description	Date

FUEL CELL DERBY

MM-49 Blowout

PROJECT NUMBER	12835
DATE	05/03/23
DESIGNED BY	DD
CHECKED BY	JC
	F-109
SCALE	No Scale

PLOT DATE: 5/4/2023 2:14:21 PM