

KENNETH C. BALDWIN

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Also admitted in Massachusetts  
and New York

March 16, 2023

*Via Federal Express*

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

Re: **PETITION NO. 1462** – Distributed Solar Operations, LLC and IKEA Property, Inc. notice of election to waive exclusion from Connecticut Siting Council jurisdiction, pursuant to Connecticut General Statutes §16-50k(e), and petition for a declaratory ruling, pursuant to Connecticut General Statutes §4-176 and §16-50k, for the proposed construction, maintenance and operation of a 0.90-megawatt AC solar photovoltaic electric generating facility located at IKEA, 450 Sargent Drive, New Haven, Connecticut and associated electrical interconnection

Dear Attorney Bachman:

Distributed Solar Operations, LLC and IKEA Property, Inc. (collectively the “Petitioner”) filed a Petition for Declaratory Ruling (“Petition”) with the Siting Council on August 20, 2021 for the approval of a 0.90 MW solar voltaic electric generating parking lot canopy facility to be constructed over a portion of the IKEA parking lot at 450 Sargent Drive in New Haven. The Council approved Petition No. 1462 on November 22, 2021. A copy of the Council’s approval letter is included in Attachment 1.

## Proposed Interconnection Service Modifications

Since the Council’s approval, the Petitioner has decided to make some minor modifications to the electrical interconnection system, including interconnection routing between the solar canopy and IKEA’s main electrical room in the southeast corner of the building. The proposed electrical interconnection modifications are shown on the “Overall AC Electrical Plan”

Melanie A. Bachman, Esq.

March 16, 2023

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Sheet E-100 included in Attachment 2. Also included in Attachment 2 is the “Overall Site Plan” Sheet A-100 included in the Petition which shows the “approved” interconnection routing.

As shown on the Overall Site Plan Sheet A-100, the Petitioner originally planned to install a single electric transformer on a concrete pad within a landscaped island in the parking area on the westerly side of the IKEA building. Electrical interconnection service would then extend underground from the solar canopy through a portion of the paved parking lot to this transformer, then underground, within existing paved driveways and IKEA loading areas, along the west and south sides of the IKEA building to the main electrical room in the southeasterly corner of the building.

The modified electrical interconnection service line (shown on Overall Electrical Plan Sheet E-100) would extend underground from the solar canopy to a new step-up transformer located within the IKEA parking lot to the west of the canopy. The electric interconnection service line would then extend underground from this new transformer to the northwest corner of the IKEA building. From there, the line will extend up the side of the building to the roof, along the roof to the southeasterly corner of the building, and then down the outside wall of the building where it will connect with a new step-down transformer on the ground adjacent to IKEA’s main electrical room.

These modifications will result in the reduction in the amount of disturbance of existing paved surfaces at the site and a more efficient interconnection system, preventing voltage drop and productivity loss that would otherwise occur from the lengthy interconnection run. The Petitioner respectfully requests staff approval of these interconnection service modifications.

## **Submission of TCLP Test Results**

Pursuant to Condition No. 2 of the Council’s approval, Attachment 3 contains the TCLP Report, provided by the Petitioner’s solar panel vendor, for the Q.PEAK DUO L G5 modules, which is substantially similar to the Q.PEAK DUO L G8 module approved in the Petition. The solar panel manufacturer informed the Petitioner that a TCLP Report is not available for the Q.PEAK DUO L G8 module. The vendor however, confirmed that the Q.PEAK DUO L G5 TCLP Report will provide the Council with all of the necessary TCLP information. The only difference between the L G8 panel and the L G5 panel is cell size within each panel. The materials and composition of the two panels is otherwise identical. Also included in Attachment 3 is the TCLP EPA Limits document and a TCLP Fact Sheet explaining the TCLP testing procedures.

Melanie A. Bachman, Esq.

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## **Submission of Final Structural Design Drawing**

Finally, in response to Condition No. 3 of the Council's approval, included in Attachment 4 is a set of final structural design drawings for the approved canopy system stamped and signed by a Connecticut Licensed Professional Engineer.

If you have any questions or need any additional information, please contact me.

Sincerely,



Kenneth C. Baldwin

Enclosures

Copy to: Justin Elicker, Mayor, City of New Haven

# **ATTACHMENT 1**



# 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](mailto:siting.council@ct.gov)

[www.ct.gov/csc](http://www.ct.gov/csc)

### CERTIFIED MAIL RETURN RECEIPT REQUESTED

November 22, 2021

Kenneth C. Baldwin, Esq.

Christopher Y. Eddy, Esq.

Robinson & Cole LLP

280 Trumbull Street

Hartford, CT 06103-3597

[kbaldwin@rc.com](mailto:kbaldwin@rc.com)

[ceddy@rc.com](mailto:ceddy@rc.com)

RE: **PETITION NO. 1462** – Distributed Solar Operations, LLC and IKEA Property, Inc. notice of election to waive exclusion from Connecticut Siting Council jurisdiction, pursuant to Connecticut General Statutes §16-50k(e), and petition for a declaratory ruling, pursuant to Connecticut General Statutes §4-176 and §16-50k, for the proposed construction, maintenance and operation of a 0.90-megawatt AC solar photovoltaic electric generating facility located at IKEA, 450 Sargent Drive, New Haven, Connecticut, and associated electrical interconnection.

Dear Attorneys Baldwin and Eddy:

At a public meeting held on November 18, 2021, the Connecticut Siting Council (Council) considered and ruled that the above-referenced proposal meets air and water quality standards of the Department of Energy and Environmental Protection and would not have a substantial adverse environmental effect, and pursuant to Connecticut General Statutes § 16-50k, would not require a Certificate of Environmental Compatibility and Public Need, with the following conditions:

1. Approval of any project changes be delegated to Council staff;
2. Submit solar module specification sheets and Toxicity Characteristic Leaching Procedure test results that indicate the modules would not be characterized as hazardous waste under current testing criteria;
3. Submit the final structural design for the canopy system stamped by a Professional Engineer duly licensed in the State of Connecticut prior to installation;
4. Unless otherwise approved by the Council, if the facility authorized herein is not fully constructed within three years from the date of the mailing of the Council's decision, this decision shall be void, and the facility owner/operator shall dismantle the facility and remove all associated equipment or reapply for any continued or new use to the Council before any such use is made. The time between the filing and resolution of any appeals of the Council's decision shall not be counted in calculating this deadline. Authority to monitor and modify this schedule, as necessary, is delegated to the Executive Director. The facility owner/operator shall provide written notice to the Executive Director of any schedule changes as soon as is practicable;



CONNECTICUT SITING COUNCIL

Affirmative Action Equal Opportunity Employer

5. Any request for extension of the time period to fully construct the facility shall be filed with the Council not later than 60 days prior to the expiration date of this decision and shall be served on all parties and intervenors, if applicable, and the City of New Haven;
6. Within 45 days after completion of construction, the Council shall be notified in writing that construction has been completed;
7. The facility owner/operator shall remit timely payments associated with annual assessments and invoices submitted by the Council for expenses attributable to the facility under Conn. Gen. Stat. §16-50v;
8. This Declaratory Ruling may be transferred, provided the facility owner/operator/transferor is current with payments to the Council for annual assessments and invoices under Conn. Gen. Stat. §16-50v and the transferee provides written confirmation that the transferee agrees to comply with the terms, limitations and conditions contained in the Declaratory Ruling, including timely payments to the Council for annual assessments and invoices under Conn. Gen. Stat. §16-50v; and
9. If the facility owner/operator is a wholly owned subsidiary of a corporation or other entity and is sold/transferred to another corporation or other entity, the Council shall be notified of such sale and/or transfer and of any change in contact information for the individual or representative responsible for management and operations of the facility within 30 days of the sale and/or transfer.

This decision is under the exclusive jurisdiction of the Council and is not applicable to any other modification or construction. All work is to be implemented as specified in the petition dated August 20, 2021 and additional information received on September 30, 2021.

Enclosed for your information is a copy of the staff report on this project.

Sincerely,



Melanie A. Bachman  
Executive Director

MAB/RDM/lm

Enclosure: Staff Report dated November 18, 2021

c: Service List, dated August 20, 2021  
The Honorable Justin Elicker, Mayor, City of New Haven ([jelicker@newhavenct.gov](mailto:jelicker@newhavenct.gov))



# 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](mailto:siting.council@ct.gov)

[www.ct.gov/csc](http://www.ct.gov/csc)

### Petition No. 1462

**Distributed Solar Operations, LLC and IKEA Property, Inc.  
450 Sargent Drive, New Haven, Connecticut**

### Staff Report November 18, 2021

#### Introduction

On August 20, 2021, Distributed Solar Operations, LLC and IKEA Property, Inc. (collectively, the Petitioner) submitted a notice of election to waive exclusion from the Connecticut Siting Council's (Council) jurisdiction, pursuant to Connecticut General Statutes (CGS) §16-50k(e), and a petition for a declaratory ruling (petition) pursuant to CGS-§4-176 and §16-50k for the construction, operation and maintenance of a 0.90-megawatt (MW) AC solar photovoltaic electric generating facility located on a canopy over a portion of the existing parking lot at the IKEA property at 450 Sargent Drive, New Haven, Connecticut.

CGS §16-50k(e) states, "Any person intending to construct a facility excluded from one or more provisions of this chapter may, to the extent permitted by law, elect to waive such exclusion by delivering notice of such waiver to the council. Such provisions shall thereafter apply to each facility identified in such notice from the date of its receipt by the council." Under CGS §16-50i(a)(3), the Council has jurisdiction over electric generating facilities utilizing renewable energy sources with a generating capacity of *more than one megawatt*. (Emphasis added).

Pursuant to Regulations of Connecticut State Agencies (RCSA) §16-50j-40, on or about August 20, 2021, the Petitioner notified City of New Haven (City) officials, state officials and agencies, the property owner, and abutting property owners of the notice of election to waive exclusion from Council jurisdiction and the proposed project.

The Council issued interrogatories to the Petitioner on September 16, 2021. On September 30, 2021 the Petitioner submitted responses to the Council's interrogatories.

Pursuant to CGS §4-176(e) of the Uniform Administrative Procedure Act (UAPA), an administrative agency is required to take an action on a petition for a declaratory ruling within 60 days of receipt. On October 7, 2021, pursuant to CGS §4-176(e), the Council voted to set the date by which to render a decision on the Petition as no later than February 16, 2022, which is the 180-day statutory deadline for a final decision under CGS §4-176(i).

#### Municipal Consultation

Prior to filing the Petition with the Council, the Petitioner met remotely with City officials to discuss the Project. The City was receptive to the project and had no concerns. Additionally, during a July 26, 2021 remote meeting, the City Planner stated the project is consistent the City's Long Wharf Responsible Growth Plan.

On August 20, 2021, the Council sent correspondence to the City stating that the Council has received the Petition and invited the City to contact the Council with any questions or comments by September 9, 2021. No comments were received from the City.

### **State Agency Comments**

On August 20, 2021, the Council sent correspondence requesting comments on the proposed project from the following state agencies by September 9, 2021: Department of Energy & Environmental Protection (DEEP); Department of Agriculture (DOAg); Department of Public Health (DPH); Council on Environmental Quality (CEQ); Public Utilities Regulatory Authority (PURA); Office of Policy and Management (OPM); Department of Economic and Community Development (DECD); Department of Emergency Services and Public Protection (DESPP); Department of Consumer Protection (DCP); Department of Labor (DOL); Department of Administrative Services (DAS); Department of Transportation (DOT); the Connecticut Airport Authority (CAA); and the State Historic Preservation Office (SHPO).

No state agencies provided written comment on the proposed project.

### **Public Act 17-218**

Public Act 17-218 requires, “for a solar photovoltaic facility with a capacity of two or more megawatts, to be located on prime farmland or forestland, excluding any such facility that was selected by DEEP in any solicitation issued prior to July 1, 2017, pursuant to section 16a-3f, 16a-3g or 16a3j, the DOAg represents, in writing, to the Council that such project will not materially affect the status of such land as prime farmland or DEEP represents, in writing, to the Council that such project will not materially affect the status of land as core forest.” The proposed facility has a generating capacity of 0.90 MW. Therefore, it is exempt from the provisions of Public Act 17-218.

### **Public Benefit**

The project would be a distributed energy resource facility as defined in CGS § 16-1(a)(49). CGS § 16a-35k establishes the State’s energy policy, including the goal to “develop and utilize renewable energy resources, such as solar and wind energy, to the maximum practicable extent.” The 2018 Comprehensive Energy Strategy (2018 CES) highlights eight key strategies to guide administrative and legislative action over the next several years. Specifically, Strategy No. 3 is “Grow and sustain renewable and zero-carbon generation in the state and region.” Furthermore, on September 3, 2019, Governor Lamont issued Executive Order No. 3, which calls for the complete decarbonization of the electric sector by 2040. The proposed facility will contribute to fulfilling the State’s Renewable Portfolio Standard and Global Warming Solutions Act as a zero emission Class I renewable energy source.

IKEA maintains an existing rooftop solar array and fuel cell facility<sup>1</sup> with a combined output of approximately 1,095 kW that provides power to the IKEA store on the property. The existing rooftop solar array and fuel cell facility together with the proposed parking canopy solar facility are designed to be roughly equivalent to the peak load of the on-site IKEA store. If the total output of the existing rooftop solar array, fuel cell facility and parking canopy solar facility exceeds the energy consumption of the store, excess energy would be exported to the local United Illuminating Company (UI) electric distribution system through a net metering agreement.

A battery storage system is not proposed. The proposed facility is not designed to provide backup power to the IKEA store in the event of a power outage.

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<sup>1</sup> On June 23, 2016, in Petition 1229, the Council issued a Declaratory Ruling to IKEA for construction, operation and maintenance of a customer-side 250-kilowatt fuel cell facility at the IKEA property at 450 Sargent Drive in New Haven. The fuel cell facility became operational on December 30, 2016.

### **Proposed Site**

The Petitioner proposes to construct the solar facility on a 2.5-acre portion of a 16.7-acre parcel owned by IKEA. The property, zoned Planned Development District-100, is developed with an IKEA store and associated parking areas.

The Petitioner would develop the project in the northwest portion of the paved parking lot, north of the existing IKEA store.

Land use in the immediate area is urban, with commercial development to the north, west and south, and Interstate 95 to the east. The Pirelli Tire Building, located on a 1.8-acre parcel, abuts the IKEA parking lot to the south.

Pursuant to CGS §16-50p(g), the Council has no authority to compel a parcel owner to sell or lease property, or portions thereof, for the purpose of siting a facility.<sup>2</sup>

### **Proposed Project**

The Project consists of a 0.9 MW AC solar photovoltaic facility comprised of 3,886 panels (420 Watt) installed on new overhead parking canopies. Two separate solar canopy areas would be developed.

The solar panels would comprise the roof of the canopies. The canopies would be supported by steel columns installed on 36-inch diameter concrete piers. The piers would be set into the ground to a depth of 12 to 15 feet depending on specific soil conditions. The canopies would be a minimum clearance height of 14.5 feet above grade allowing for enough clearance for passenger vehicles to enter unimpeded.

The canopies would be located over existing parking spaces with the columns located (to the extent practicable) on the painted parking markings to retain as much of the existing parking as possible. Light poles within the project footprint would be removed and would be replaced by new lights under the canopies.

The solar panels would be oriented towards the south at an angle of about five degrees from the horizontal with the top edge approximately 17.6 feet above ground level (agl). String inverters would be mounted on the canopy support columns at a height of 10 feet agl. Underground cable within a utility trench would connect the inverters to an equipment pad in the parking lot, then to a utility room on the south side of the building which is interconnected to UI's electric distribution system through an existing main service connection. No other electrical interconnection infrastructure is required.

The proposed solar facility would utilize existing access to the IKEA property. No new access drives would be constructed. Eight trees on existing landscape islands within the project footprint would be removed.

The Project's net capacity factor is estimated to be 23 percent with an estimated annual degradation of approximately 0.54 percent. Energy production estimates include losses due to dust, pollen, and weather events.

Construction is anticipated to commence in the first quarter of 2022 with site operation anticipated in the third quarter of 2022. Typical construction hours are Monday – Friday, 7:00 AM to 7:00 PM. Night work would occur from 11:00 PM to 3:00 AM, when necessary.

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<sup>2</sup> *Corcoran v. Connecticut Siting Council*, 284 Conn. 455 (2007); CGS §16-50p(g) (2019).

The estimated cost of the project is approximately \$4.4 M.

### **Public Safety**

The proposed project would comply with the National Electrical Code, the National Electrical Safety Code and any applicable National Fire Protection Association codes and standards. The Petitioner would discuss emergency response procedures with local emergency responders if requested.

Damage to the facility from a vehicle fire beneath the canopy would be reduced due to the construction material (concrete and steel) and the fire rating of the solar panels. The canopy height would provide enough clearance for most types of emergency response vehicles.

The proposed facility would have a protection system to shut down or isolate the facility in the event of a fault or abnormal electrical disturbance. Inverter strings would be able to disconnect independent of the other inverter strings if there was a string failure or if maintenance was required on certain sections of the facility. The inverters are programmed to monitor grid voltage, ground faults, and array imbalances and would shut down during abnormalities. Circuit breakers and the main disconnect at the electrical pad would also provide system protection.

The structural design of the facility would comply with the Connecticut State Building Code. The design wind speed for the solar panels is 125 mph. The panels would be bolted directly to structural framing using four bolts per panel.

Lighting under the canopies would comply with City building codes. IKEA would be responsible for monitoring security in the canopy area.

Rain, snow, and ice would not slide/fall onto vehicles or pedestrians due to a gutter system that would be installed between the canopy solar tilt angles. The gutter downspouts would discharge at grade.

The proposed project limits would be located approximately 2.5 miles southeast of the Tweed-New Haven Airport. Per Federal Aviation Administration (FAA) guidelines, there would be no impact on air navigation and a glare analysis is not required. The FAA required that the Petitioner must notify the Yale-New Haven Hospital (helipad) if temporary cranes are used for construction.

Due to the existing high levels of urban noise around the IKEA store, the operational noise levels at the property lines would be in compliance with DEEP Noise Control Standards. The inverters are the main source of noise when the solar facility is operational, emitting a noise level of 65 dBA at 3.3 feet. Due to the distance to the property lines and the lack of nearby residential use, noise from the inverters would not exceed regulatory criteria.

Construction-related noise is exempt from DEEP Noise Control Standards.

The Site is located within a Federal Emergency Management Agency designated 100-year flood zone. The panels and inverters would be installed above the flood zone level.

Subsurface soils were investigated and determined to be nonhazardous.

## **Environmental Effects and Mitigation Measures**

### *Historic and Recreational Resources*

The proposed site is within a half-mile of three historic districts listed on the National Register of Historic Places; however, due to the low height of the canopy and intervening urban development, the proposed facility would not be visible from these districts.

The Pirelli Tire Building, a multistory building constructed in 1970 that is listed on the National Register of Historic Places, abuts the IKEA property to the south. IKEA purchased the building in 2003 and demolished the low rise section of the building to create parking for the IKEA store. IKEA sold the building in 2019. Although the proposed facility would be visible from the west side of the building, there would be no adverse effect on the building due to its location in an urbanized area.

Based on a review of historic maps and aerial photographs, the site has been heavily altered from past urban development and has no potential to yield intact subsurface cultural deposits.

No public parks or other publicly accessible recreation resources are located adjacent to the site.

### *Visibility*

The proposed project would be visible year-round from 53 acres and seasonally visible from an additional 12 acres within a half-mile of the site. The areas of visibility consist of an urban landscape with commercial and transportation-related development.

The project would not be visible from the City's Long Wharf Park located approximately 0.25 mile south of the site, across Interstate 95.

### *Air Quality*

The Project would not produce air or water emissions as a result of operation. The solar project would not produce air emissions of regulated air pollutants or greenhouse gases during operation.

### *Water Quality*

The site parcel is not within a DEEP-designated Aquifer Protection Area or a mapped Public Drinking Supply Watershed. Groundwater in the area is not suitable for human consumption.

There are no wetlands or watercourses on the site.

The project would not require a DEEP Stormwater Permit. Drainage from the canopy downspouts would be directed to existing on-site catch basins.

Fuel for construction vehicles/machinery would be delivered to the site by a fuel service. Rubber mats would be used in the re-fueling area and spill kits would be kept on-site.

### *Wildlife*

The site has no wildlife value and is not within a DEEP Natural Diversity Database Area.

The red knot, a federally-listed Threatened Species, is known to occur along the shoreline in Connecticut. Although the site is within 0.25 mile of the shoreline, no suitable habitat is present on the site, and thus, there would be no impact to this bird species.

### **Operation and Maintenance**

The canopy support structures would be inspected for maintenance purposes on an annual basis. The operation of the solar array system would be monitored remotely on a daily basis.

Module cleaning would be conducted on an as needed basis with deionized water.

Damage from shorebirds dropping shells on the solar panels is not expected as the glass covering the solar panels is designed to withstand hail with a diameter of one inch.

### **Conclusion**

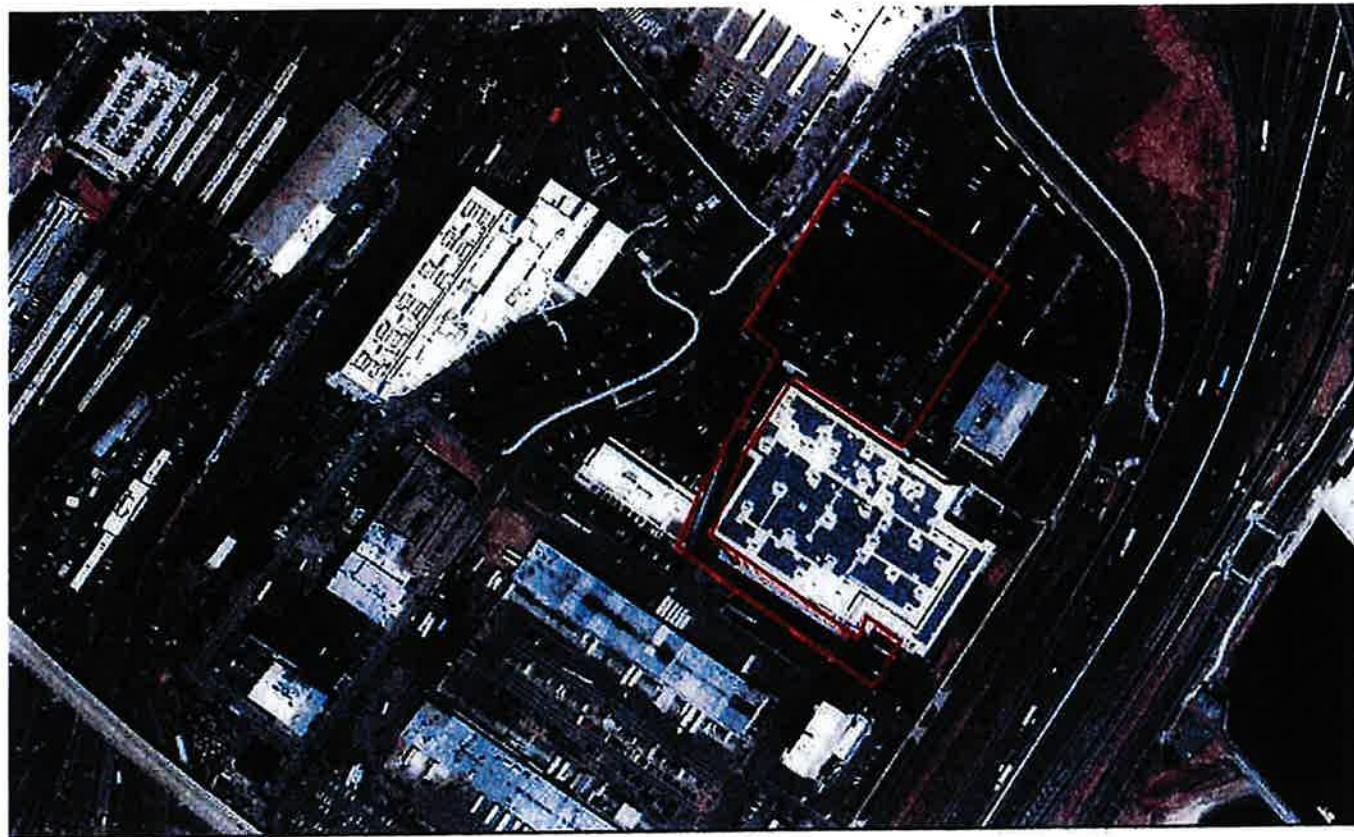
The project is a distributed energy resource with a capacity of not more than sixty-five megawatts, meets air and water quality standards of the DEEP, would not materially affect the status of prime farmland or core forest, and would not have a substantial adverse environmental effect. The proposed project will not produce air emissions, will not utilize water to produce electricity, was designed to minimize environmental impacts, and furthers the State's energy policy by developing and utilizing renewable energy resources and distributed energy resources.

### **Recommendations**

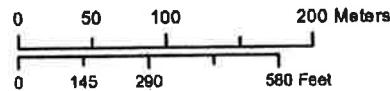
If approved, staff recommends the following conditions:

1. Approval of any project changes be delegated to Council staff;
2. Submit solar module specification sheets and Toxicity Characteristic Leaching Procedure test results that indicate the modules would not be characterized as hazardous waste under current testing criteria; and
3. Submit the final structural design for the canopy system stamped by a Professional Engineer duly licensed in the State of Connecticut prior to installation.

Site Location- Aerial View



Project Area



IKEA Upgrade Project, Connecticut  
Phase Ia Cultural Resources Assessment Survey  
May 2021



**Site Location in IKEA Store Parking Lot**



**Photograph of a Similar Solar Canopy System**



## **ATTACHMENT 2**

**DSD** |||DISTRIBUTED SOLAR DEVELOPMENT, LLC  
200 HARBORSHIDE DRIVE, STE 200  
SCHENECTADY, NY 12305**APPLIED**  
ENGINEERING CONSULTANTS, INC.

SEAL &amp; SIGNATURE

9/2/2021 10:40:34 AM  
As design professional in responsible charge.

PROJECT NAME:	IKEA NEW HAVEN PHOTOVOLTAIC SYSTEM
PROJECT ADDRESS:	450 SARGENT DRIVE NEW HAVEN, CT 06511

NO.	DATE:	REVISION DESCRIPTION:	DRAWN BY:	CHECKED BY:
1	07-30-21	CT SITTING COUNCIL REV 1	CC	AN

SCALE: 100' = 1'-0"

SHEET TITLE:

OVERALL SITE PLAN

SHEET NO.:

A-100

TOTAL NUMBER OF SHEETS:

## CANOPY ARRAY CHART

HANNA Q CELLS, QPEAK DUO L-66.9 420 (420W)

CANOPY NUMBER	PANELS	COLUMNS	POWER (KWH/TC)	ARRAY TILT (°)	AZIMUTH
GP1	2238	36	934.9	5°	124° / 304°
GP2	1646	26	642.1	5°	124° / 304°
TOTALS	3886	62	1572.0		

## LEGEND/ SYMBOLS

	EXISTING TREE TO REMAIN
	NEW TREE TO BE PLANTED
	EXISTING TREE TO BE DEMO
	EXISTING LIGHT FIXTURE
	EXISTING LIGHT FIXTURE TO BE DEMO
	EXISTING LIGHT FIXTURE TO REMAIN
	EXISTING FIRE HYDRANT TO BE REPAVED
	OUTLINE OF MODULES
	NEW LOW VOLTAGE ELECTRICAL TRENCH EASEMENT

NEW FOUNDATION WITH STEEL COLUMN

NEW CANOPY MODULES

NEW STEEL BEAM/PURLIN

NEW STEEL BEAM/Rafter

UNDERGROUND GAS UTILITY

UNDERGROUND ELECTRIC UTILITY

UNDERGROUND SANITARY UTILITY

UNDERGROUND IRRIGATION UTILITY

UNDERGROUND WATER UTILITY LINE

UNDERGROUND STORM DRAIN LINE

UNDERGROUND TELECOMMUNICATION LINE

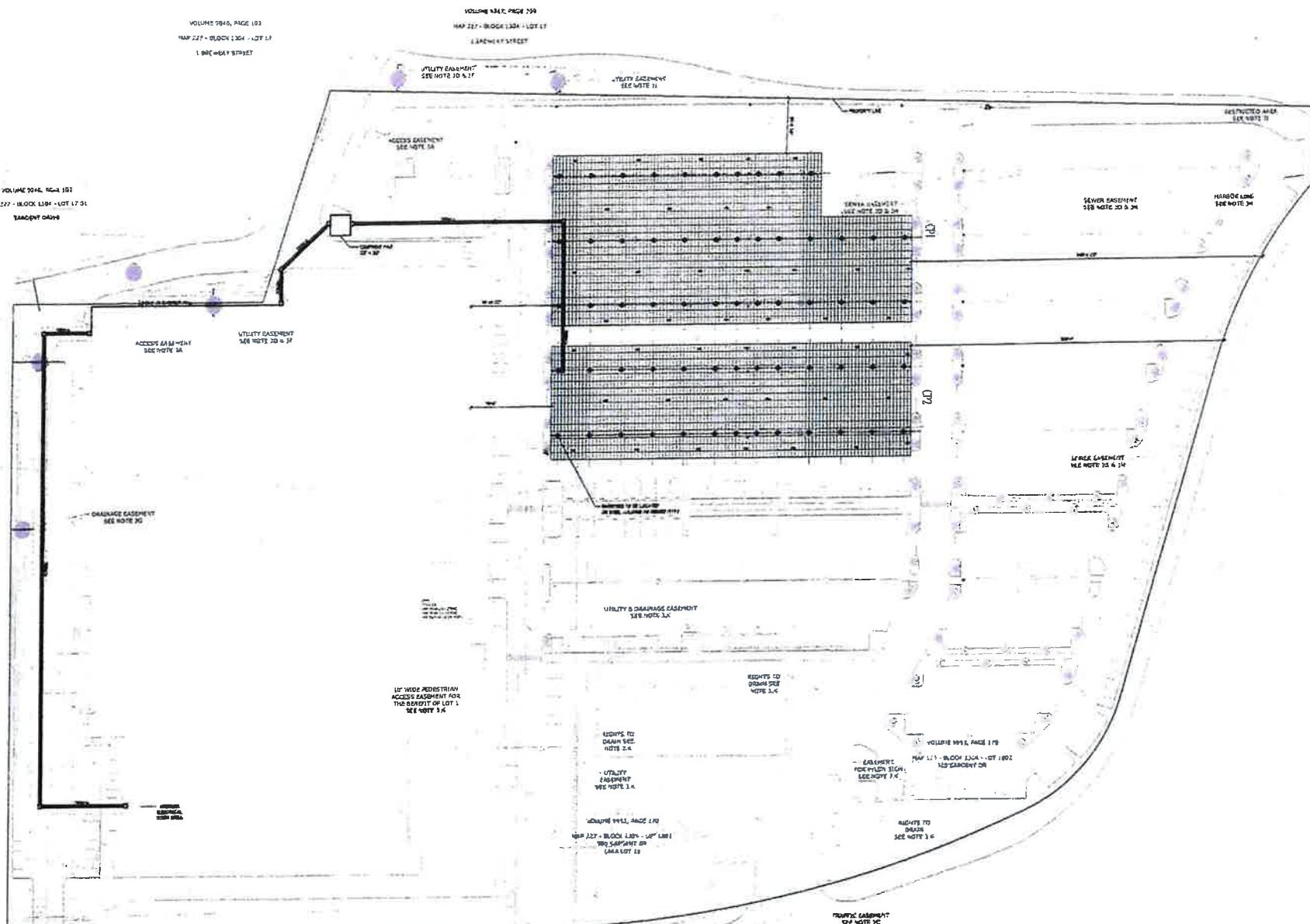
UNDERGROUND UNKNOWN LINE

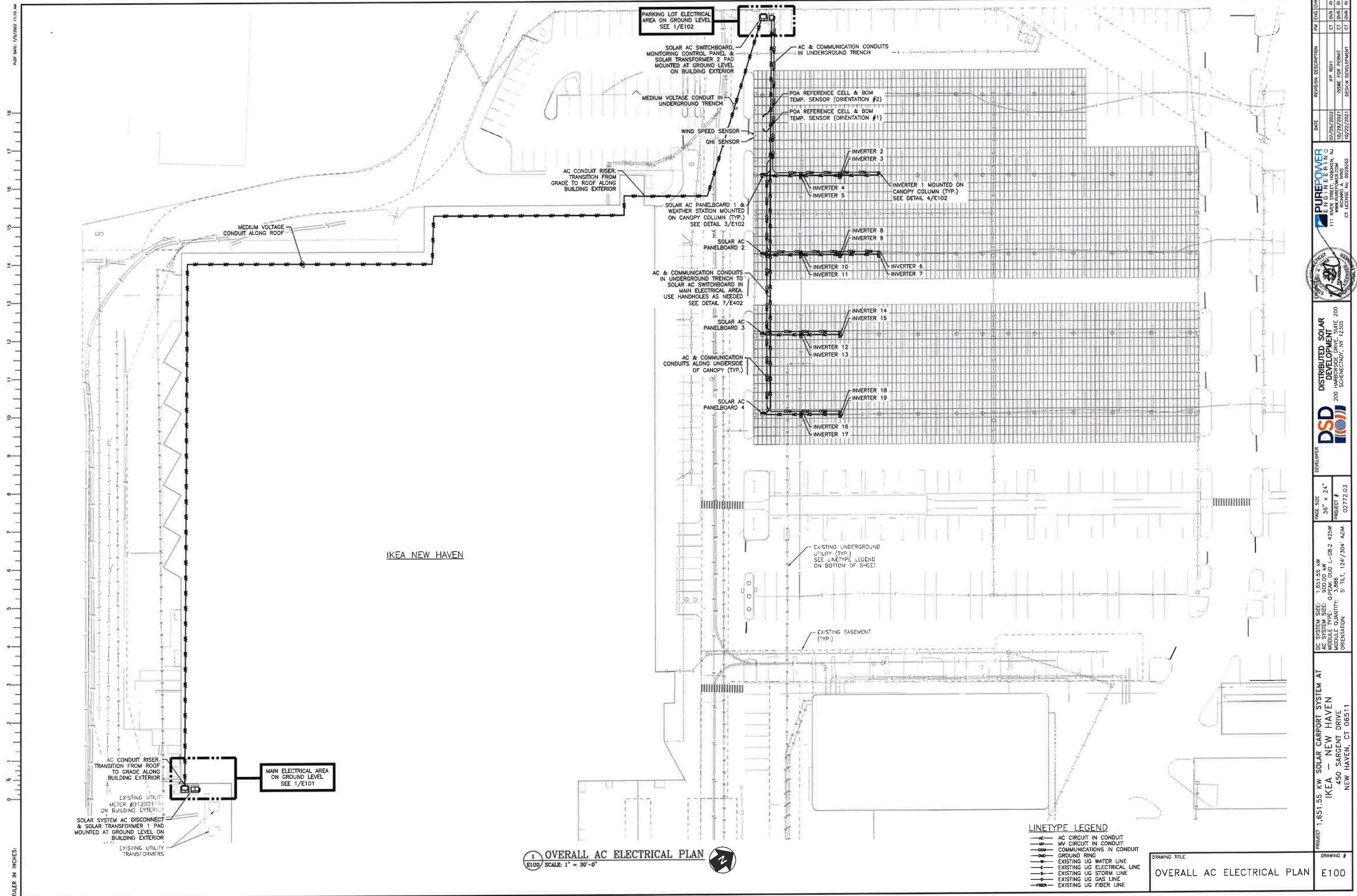
CHAIN LINK FENCE

OUTLINE OF MODULES

NEW LOW VOLTAGE ELECTRICAL TRENCH

EASEMENT





# **ATTACHMENT 3**



714-449-9937  
562-646-1611  
805-399-0060

11007 FOREST PLACE  
SANTA FE SPRINGS, CA 90670  
WWW.JONESENV.COM

**JONES ENVIRONMENTAL  
LABORATORY RESULTS**

**Client:** Hanwha Q CELLS America Inc.  
**Client Address:** 400 Spectrum Center Dr., Suite 1400  
Irvine, CA 92618

**Report date:** 4/4/2019  
**JEL Ref. No.:** ST-13602

**Attn:** Ralph Alvarado

**Date Sampled:** 4/1/2019  
**Date Received:** 4/1/2019  
**Date Analyzed:** 4/3-4/2019  
**Physical State:** Solar Panel

Q.PEAK DUO L-G5.2 XXX

**ANALYSES REQUESTED**

1. TCLP Metals by ICP-OES

Approval:

A handwritten signature in black ink, appearing to read 'A Haar'.

Angela Haar, Ph. D.  
Mobile Lab Manager



714-449-9937 | 11007 FOREST PLACE  
562-646-1611 | SANTA FE SPRINGS, CA 90670  
805-399-0060 | WWW.JONESENV.COM

## JONES ENVIRONMENTAL LABORATORY RESULTS

**Client:** Hanwha Q CELLS America Inc. **Report date:** 4/4/2019  
**Client Address:** 400 Spectrum Center Dr., Suite 1400 **Jones Ref. No.:** ST-13602  
Irvine, CA 92618

**Attn:** Ralph Alvarado **Date Sampled:** 4/1/2019  
**Date Received:** 4/1/2019  
**Date Analyzed:** 4/3-4/2019  
**Physical State:** Solar Panel -  
Q.PEAK DUO L-G5.2 XXX

**Sample ID:** Sample 1 **Jones ID:** ST-13602-01

### TCLP Metals by ICP-OES

	<u>Result</u>	<u>Dilution</u>	<u>Batch</u>	<u>Prepared</u>	<u>Analyzed</u>	<u>Reporting Limit</u>	<u>Units</u>
<b>Analytes:</b>							
Silver, Ag	0.01	1	TCLP_040219-01	4/2/2019	4/3/2019	0.01	mg/L
Arsenic, As	ND	1	"	"	"	0.01	mg/L
Barium, Ba	0.10	1	"	"	"	0.01	mg/L
Cadmium, Cd	ND	1	"	"	"	0.01	mg/L
Chromium, Cr	ND	1	"	"	"	0.01	mg/L
Selenium, Se	ND	1	"	"	"	0.01	mg/L
Lead, Pb	1.48	1	"	"	"	0.01	mg/L

### EPA 7471A - Mercury by Cold Vapor Atomic Absorption

	<u>Result</u>	<u>Dilution</u>	<u>Batch</u>	<u>Prepared</u>	<u>Analyzed</u>	<u>Reporting Limit</u>	<u>Units</u>
Mercury, Hg	ND	1	TCLP_040219-01	4/2/2019	4/4/2019	0.1	µg/L

ND= Not Detected



714-449-9937 | 11007 FOREST PLACE  
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## JONES ENVIRONMENTAL LABORATORY RESULTS

**Client:** Hanwha Q CELLS America Inc. **Report date:** 4/4/2019  
**Client Address:** 400 Spectrum Center Dr., Suite 1400 **Jones Ref. No.:** ST-13602  
Irvine, CA 92618

**Attn:** Ralph Alvarado **Date Sampled:** 4/1/2019  
**Date Received:** 4/1/2019  
**Date Analyzed:** 4/3-4/2019  
**Physical State:** Solar Panel -  
Q.PEAK DUO L-G5.2 XXX

**Sample ID:** Sample 2 **Jones ID:** ST-13602-02

### TCLP Metals by ICP-OES

	<u>Result</u>	<u>Dilution</u>	<u>Batch</u>	<u>Prepared</u>	<u>Analyzed</u>	<u>Reporting Limit</u>	<u>Units</u>
<b>Analytes:</b>							
Silver, Ag	ND	1	TCLP_040219-01	4/2/2019	4/3/2019	0.01	mg/L
Arsenic, As	ND	1	"	"	"	0.01	mg/L
<b>Barium, Ba</b>	<b>0.07</b>	1	"	"	"	0.01	mg/L
Cadmium, Cd	ND	1	"	"	"	0.01	mg/L
Chromium, Cr	ND	1	"	"	"	0.01	mg/L
Selenium, Se	ND	1	"	"	"	0.01	mg/L
<b>Lead, Pb</b>	<b>1.36</b>	1	"	"	"	0.01	mg/L

### EPA 7471A - Mercury by Cold Vapor Atomic Absorption

	<u>Result</u>	<u>Dilution</u>	<u>Batch</u>	<u>Prepared</u>	<u>Analyzed</u>	<u>Reporting Limit</u>	<u>Units</u>
Mercury, Hg	ND	1	TCLP_040219-01	4/2/2019	4/4/2019	0.1	µg/L

ND= Not Detected



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## JONES ENVIRONMENTAL LABORATORY RESULTS

**Client:** Hanwha Q CELLS America Inc.  
**Client Address:** 400 Spectrum Center Dr., Suite 1400  
Irvine, CA 92618

**Report date:** 4/4/2019  
**Jones Ref. No.:** ST-13602

**Attn:** Ralph Alvarado

**Date Sampled:** 4/1/2019  
**Date Received:** 4/1/2019  
**Date Analyzed:** 4/3-4/2019  
**Physical State:** Solar Panel -  
Q.PEAK DUO L-G5.2 XXX

**Sample ID:** Sample 3      **Jones ID:** ST-13602-03

### TCLP Metals by ICP-OES

	<u>Result</u>	<u>Dilution</u>	<u>Batch</u>	<u>Prepared</u>	<u>Analyzed</u>	<u>Reporting Limit</u>	<u>Units</u>
<b>Analytes:</b>							
Silver, Ag	ND	1	TCLP_040219-01	4/2/2019	4/3/2019	0.01	mg/L
Arsenic, As	ND	1	"	"	"	0.01	mg/L
<b>Barium, Ba</b>	<b>0.12</b>	1	"	"	"	0.01	mg/L
Cadmium, Cd	ND	1	"	"	"	0.01	mg/L
Chromium, Cr	ND	1	"	"	"	0.01	mg/L
Selenium, Se	ND	1	"	"	"	0.01	mg/L
<b>Lead, Pb</b>	<b>1.07</b>	1	"	"	"	0.01	mg/L

### EPA 7471A - Mercury by Cold Vapor Atomic Absorption

	<u>Result</u>	<u>Dilution</u>	<u>Batch</u>	<u>Prepared</u>	<u>Analyzed</u>	<u>Reporting Limit</u>	<u>Units</u>
Mercury, Hg	ND	1	TCLP_040219-01	4/2/2019	4/4/2019	0.1	µg/L

ND= Not Detected



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## JONES ENVIRONMENTAL LABORATORY RESULTS

**Client:** Hanwha Q CELLS America Inc. **Report date:** 4/4/2019  
**Client Address:** 400 Spectrum Center Dr., Suite 1400 **Jones Ref. No.:** ST-13602  
Irvine, CA 92618

**Attn:** Ralph Alvarado **Date Sampled:** 4/1/2019  
**Date Received:** 4/1/2019  
**Date Analyzed:** 4/3-4/2019  
**Physical State:** Solar Panel - Q.PEAK DUO L-G5.2 XXX

**Sample ID:** Sample 4 **Jones ID:** ST-13602-04

### TCLP Metals by ICP-OES

	<u>Result</u>	<u>Dilution</u>	<u>Batch</u>	<u>Prepared</u>	<u>Analyzed</u>	<u>Reporting Limit</u>	<u>Units</u>
<b>Analytes:</b>							
Silver, Ag	ND	1	TCLP_040219-01	4/2/2019	4/3/2019	0.01	mg/L
Arsenic, As	ND	1	"	"	"	0.01	mg/L
<b>Barium, Ba</b>	<b>0.11</b>	1	"	"	"	0.01	mg/L
Cadmium, Cd	ND	1	"	"	"	0.01	mg/L
Chromium, Cr	ND	1	"	"	"	0.01	mg/L
Selenium, Se	ND	1	"	"	"	0.01	mg/L
Lead, Pb	<b>1.04</b>	1	"	"	"	0.01	mg/L

### EPA 7471A - Mercury by Cold Vapor Atomic Absorption

	<u>Result</u>	<u>Dilution</u>	<u>Batch</u>	<u>Prepared</u>	<u>Analyzed</u>	<u>Reporting Limit</u>	<u>Units</u>
Mercury, Hg	ND	1	TCLP_040219-01	4/2/2019	4/4/2019	0.1	µg/L

ND= Not Detected



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## JONES ENVIRONMENTAL QUALITY CONTROL INFORMATION

**Client:** Hanwha Q CELLS America Inc. **Report date:** 4/4/2019  
**Client Address:** 400 Spectrum Center Dr., Suite 1400 **Jones Ref. No.:** ST-13602  
Irvine, CA 92618

**Attn:** Ralph Alvarado **Date Sampled:** 4/1/2019  
**Date Received:** 4/1/2019  
**Date Analyzed:** 4/3-4/2019  
**Physical State:** Solar Panel -  
Q.PEAK DUO L-G5.2 XXX

**BATCH:** TCLP\_040219-01      **Prepared:** 4/2/2019      **Analyzed:** 4/3/2019

### TCLP Metals by ICP-OES

	Result	Spike Level	% REC	% REC Limits	% RPD	Reporting Limit	Units
<b>METHOD BLANK:</b>	<u>TCLP_040219-MB1</u>						
<b>Analytes:</b>							
Silver, Ag	ND					0.01	mg/L
Arsenic, As	ND					0.01	mg/L
Barium, Ba	ND					0.01	mg/L
Cadmium, Cd	ND					0.01	mg/L
Chromium, Cr	ND					0.01	mg/L
Selenium, Se	ND					0.01	mg/L
Lead, Pb	ND					0.01	mg/L

ND= Not Detected



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## JONES ENVIRONMENTAL QUALITY CONTROL INFORMATION

<b>Client:</b>	Hanwha Q CELLS America Inc.	<b>Report date:</b>	4/4/2019
<b>Client Address:</b>	400 Spectrum Center Dr., Suite 1400 Irvine, CA 92618	<b>Jones Ref. No.:</b>	ST-13602
<b>Attn:</b>	Ralph Alvarado	<b>Date Sampled:</b>	4/1/2019
		<b>Date Received:</b>	4/1/2019
		<b>Date Analyzed:</b>	4/3-4/2019
		<b>Physical State:</b>	Solar Panel - Q.PEAK DUO L-G5.2 XXX

**BATCH:** TCLP\_040219-01      **Prepared:** 4/2/2019      **Analyzed:** 4/3/2019

### TCLP Metals by ICP-OES

	Result	Spike Level	Source Result	% REC	% RPD	% REC Limits	Units
<b>LCS:</b> <u>TCLP_040219-LCS1</u>							
<b>Analytes:</b>							
Silver, Ag	<b>5.10</b>	5.00		102%		80 - 120	mg/L
Arsenic, As	<b>5.93</b>	5.00		119%		80 - 120	mg/L
Barium, Ba	<b>5.32</b>	5.00		106%		80 - 120	mg/L
Cadmium, Cd	<b>5.26</b>	5.00		105%		80 - 120	mg/L
Chromium, Cr	<b>5.16</b>	5.00		103%		80 - 120	mg/L
Selenium, Se	<b>5.46</b>	5.00		109%		80 - 120	mg/L
Lead, Pb	<b>5.20</b>	5.00		104%		80 - 120	mg/L
<b>LCSD:</b> <u>TCLP_040219-LCSD1</u>							
Silver, Ag	<b>5.13</b>	5.00	ND	103%	0.6%	80 - 120	mg/L
Arsenic, As	<b>5.96</b>	5.00	ND	119%	0.5%	80 - 120	mg/L
Barium, Ba	<b>5.22</b>	5.00	ND	104%	1.9%	80 - 120	mg/L
Cadmium, Cd	<b>5.17</b>	5.00	ND	103%	1.7%	80 - 120	mg/L
Chromium, Cr	<b>5.17</b>	5.00	ND	103%	0.2%	80 - 120	mg/L
Selenium, Se	<b>5.50</b>	5.00	ND	110%	0.7%	80 - 120	mg/L
Lead, Pb	<b>5.34</b>	5.00	ND	107%	2.7%	80 - 120	mg/L

	TCLP_040219-CCV1					
Silver, Ag	<b>0.95</b>	1.00	ND	95%	90-110	mg/L
Arsenic, As	<b>1.05</b>	1.00	ND	105%	90-110	mg/L
Barium, Ba	<b>0.96</b>	1.00	ND	96%	90-110	mg/L
Cadmium, Cd	<b>0.95</b>	1.00	ND	95%	90-110	mg/L
Chromium, Cr	<b>0.97</b>	1.00	ND	97%	90-110	mg/L
Selenium, Se	<b>1.00</b>	1.00	ND	100%	90-110	mg/L
Lead, Pb	<b>0.98</b>	1.00	ND	98%	90-110	mg/L

ND= Not Detected

RPD = Relative Percent Difference; Acceptability range for RPD is  $\leq 15\%$



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## JONES ENVIRONMENTAL QUALITY CONTROL INFORMATION

**Client:** Hanwha Q CELLS America Inc.  
**Client Address:** 400 Spectrum Center Dr., Suite 1400  
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**Report date:** 4/4/2019  
**Jones Ref. No.:** ST-13602

**Attn:** Ralph Alvarado

**Date Sampled:** 4/1/2019  
**Date Received:** 4/1/2019  
**Date Analyzed:** 4/3-4/2019  
**Physical State:** Solar Panel -  
Q.PEAK DUO L-G5.2 XXX

**BATCH:** TCLP\_040219-01      **Prepared:** 4/2/2019      **Analyzed:** 4/4/2019

### EPA 7471A - Mercury by Cold Vapor Atomic Absorption

	Result	Spike Level	Source Result	% REC	% RPD	% REC Limits	Units
<b>METHOD BLANK:</b> <u>TCLP_040219-MB1</u>							
<b>Analytics:</b> Mercury, Hg	ND						µg/L
<b>LCS:</b> <u>TCLP_040219-LCS1</u>							
Mercury, Hg	4.82	5.00		96%		80 - 120	µg/L
<b>LCSD:</b> <u>TCLP_040219-LCSD1</u>							
Mercury, Hg	5.01	5.00	ND	100%	3.9%	80 - 120	µg/L
<b>CCV:</b> <u>TCLP_040219-CCV1</u>							
Mercury, Hg	5.05	5.00	ND	101%		90-110	µg/L

ND= Not Detected

RPD = Relative Percent Difference; Acceptability range for RPD is  $\leq 15\%$

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## Chain-of-Custody Record

Client	Kumba Q Cells		
Project Name			
Project Address			
Email	Ralph.Givens@QCells.com		
Phone	619-4432-4100		
Report To	Sampler		
	JL Vai (0)		

Project Name <i>Yankee Q Cells</i>		Date <b>04/01/19</b>	Turn Around Requested: <input checked="" type="checkbox"/> Immediate Attention <input type="checkbox"/> Rush 24 Hours <input checked="" type="checkbox"/> Rush 48 Hours <input type="checkbox"/> Rush 72 Hours <input type="checkbox"/> Normal	Report Options EDD _____ EDF* - 10% Surcharge _____				
Client Project # <i>ST-13602</i>		Client ID <b>1</b>	*Global ID <b>1</b>	Number of Containers <b>1</b>				
Project Address <i>1000 10th Street, Suite 1000, Denver, CO 80203</i>		Sample Container / Preservative <b>TC LP</b>	Analysis Requested <b>TC LP</b>	Notes & Special Instructions				
Abbreviations  AS - Acetate Sleeve SS - Stainless Steel Sleeve BS - Brass Sleeve G - Glass AB - Amber Bottle P - Plastic SOBI - Sodium Bisulfate MeOH - Methanol HCl - Hydrochloric Acid HNO3 - Nitric Acid O - Other (See Notes)		Sample Matrix: Soil (S), Sludge (SL), Aqueous (A), Free Product (FP)	Hold					
		Sample ID	Date	Sample Collection Time	Laboratory Sample ID	Preservative	Sample Container	
		Sample 1			<b>ST-13602-01</b>		X	
		Sample 2			<b>ST-13602-02</b>		X	
		Sample 3			<b>ST-13602-03</b>		X	
		Sample 4			<b>ST-13602-04</b>		X	
Relinquished By (Signature) <i>John Doe</i>		Printed Name <b>John Doe</b>	Received By (Signature) <i>John Doe</i>	Printed Name <b>John Doe</b>	Date <b>04/01/19</b>	Time <b>17:46:00</b>	Total Number of Containers <b>1</b>	
Relinquished By (Signature) <i>Yankee Q Cells</i>		Printed Name <b>Yankee Q Cells</b>	Received By Laboratory (Signature) <i>SEC</i>	Printed Name <b>SEC</b>	Date <b>04/01/19</b>	Time <b>17:41:11</b>	Printed Name <b>John Doe</b>	
Relinquished By (Signature) <i>John Doe</i>		Printed Name <b>John Doe</b>	Received By (Signature) <i>John Doe</i>	Printed Name <b>John Doe</b>	Date <b>04/01/19</b>	Time <b>17:41:11</b>	Printed Name <b>John Doe</b>	
Relinquished By (Signature) <i>John Doe</i>		Printed Name <b>John Doe</b>	Received By (Signature) <i>John Doe</i>	Printed Name <b>John Doe</b>	Date <b>04/01/19</b>	Time <b>17:41:11</b>	Printed Name <b>John Doe</b>	

## Toxicity Characteristic Leaching Procedure (TCLP) Regulatory Levels

METALS	TCLP Regulatory Level, mg/L	EPA Hazardous Waste Number	Recommended Test Method
Arsenic	5.0	D004	7061
Barium	100.0	D005	7080
Cadmium	1.0	D006	7130
Chromium	5.0	D007	7190
Lead	5.0	D008	7420
Mercury	0.2	D009	7471
Selenium	1.0	D010	7741
Silver	5.0	D011	7760

VOLATILE ORGANICS	TCLP Regulatory Level, mg/L	EPA Hazardous Waste Number	Recommended Test Method
Benzene	0.5	D018	8260B
Carbon Tetrachloride	0.5	D019	8260B
Chlorobenzene	100.0	D021	8260B
Chloroform	6.0	D022	8260B
1,4-Dichlorobenzene	7.5	D027	8260B
1,2-Dichloroethane	0.5	D028	8260B
1,1-Dichloroethylene	0.7	D029	8260B
Methyl Ethyl Ketone	200.0	D035	8260B
Tetrachloroethylene	0.7	D039	8260B
Trichloroethylene	0.5	D040	8260B
Vinyl Chloride	0.2	D043	8260B

1 OF 2

SEMIVOLATILE ORGANICS	TCLP Regulatory Level, mg/L	EPA Hazardous Waste Number	Recommended Test Method
o-Cresol	<sup>1</sup> 200	D023	8270C
m-Cresol	<sup>1</sup> 200	D024	8270C
p-Cresol	<sup>1</sup> 200	D025	8270C
Cresol	<sup>1</sup> 200	D026	8270C
2,4-Dinitrotoluene	0.13	D030	8270C
Hexachlorobenzene	0.13	D032	8270C
Hexachlorobutadiene	0.5	D033	8270C
Hexachloroethane	3.0	D034	8270C
Nitrobenzene	2.0	D036	8270C
Pentachlorophenol	100.0	D037	8270C
Pyridine	2 - 5.0	D038	8270C
2,4,5-Trichlorophenol	400.0	D041	8270C
2,4,6-Trichlorophenol	2.0	D042	8270C

<sup>1</sup>If Cresols cannot be differentiated, total cresol may be used.

ORGANOCHLORINE PESTICIDES	TCLP Regulatory Level, mg/L	EPA Hazardous Waste Number	Recommended Test Method
Chlordane	0.03	D020	8081A
Endrin	0.02	D012	8081A
Heptachlor (and its Epoxide)	0.008	D031	8081A
Lindane	0.4	D013	8081A
Methoxychlor	10.0	D014	8081A
Toxaphene	0.5	D015	8081A

CHLOROPHENOXY ACID HERBICIDES	TCLP Regulatory Level, mg/L	EPA Hazardous Waste Number	Recommended Test Method
2,4-D	10.0	D016	8150
2,4,5-TP (Silvex)	1.0	D017	8150

Reference: 40 CFR 261, Appendix II, 1993 ed., as amended by 58 FR 46040, August 31, 1993.

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# TCLP- Toxicity Characteristic Leaching Procedure

## Waste determination testing

Many products are classified as hazardous waste when they are disposed at the end of their useful life. These products contain materials that are corrosive, flammable, reactive or toxic. Some toxic chemicals, such as lead and mercury are persistent and bioaccumulative, meaning they remain in the environment indefinitely and accumulate in and harm living things. When products containing these toxic compounds are disposed in landfills, the toxic chemicals can leach into underground drinking water supplies.

Waste codes listed in 40 CFR 261.24

TCLP Metals and Volatile Organic Compounds, Pesticides, Semi-Volatile Organic Compounds and Herbicides						
Metals			Volatile Organic Compounds			
Contaminant	EPA HW #	Regulatory Level	Contaminant	EPA HW #	Regulatory Level	
Arsenic	D004	5.0 mg/L	Benzene	D018	0.5 mg/L	
Barium	D005	100.0 mg/L	Carbon tetrachloride	D019	0.5 mg/L	
Cadmium	D006	1.0 mg/L	Chlorobenzene	D021	100.0 mg/L	
Chromium	D007	5.0 mg/L	Chloroform	D022	6.0 mg/L	
Lead	D008	5.0 mg/L	1,2-Dichloroethane	D028	0.5 mg/L	
Mercury	D009	0.2 mg/L	1,1-Dichloroethylene	D029	0.7 mg/L	
Selenium	D010	1.0 mg/L	Methyl ethyl ketone	D035	200.0 mg/L	
Silver	D011	5.0 mg/L	Tetrachloroethylene	D039	0.7 mg/L	
			Trichloroethylene	D040	0.5 mg/L	
			Vinyl chloride	D043	0.2 mg/L	
Pesticides						
Contaminant	EPA HW #	Regulatory Level	Contaminant	EPA HW #	Regulatory Level	
Chlordane	D020	0.03 mg/L	o-Cresol	D023	200.0 mg/L	
Endrin	D012	0.02 mg/L	m-Cresol	D024	200.0 mg/L	
Heptachlor (and its epoxide)	D031	0.008 mg/L	p-Cresol	D025	200.0 mg/L	
Lindane	D013	0.4 mg/L	Cresol	D026	200.0 mg/L	
Methoxychlor	D014	10.0 mg/L	1,4-Dichlorobenzene	D027	7.5 mg/L	
Toxaphene	D015	0.5 mg/L	2,4-Dinitrotoluene	D030	0.13 mg/L	
			Hexachlorobenzene	D032	0.13 mg/L	
			Hexachlorobutadiene	D033	0.5 mg/L	
			Hexachloroethane	D034	3.0 mg/L	
			Nitrobenzene	D036	2.0 mg/L	
Herbicides						
Contaminant	EPA HW #	Regulatory Level	Contaminant	EPA HW #	Regulatory Level	
2,4-D	D016	10.0 mg/L	Pentachlorophenol	D037	100.0 mg/L	
2,4,5-TP (Silvex)	D017	1.0 mg/L	Pyridine	D038	5.0 mg/L	
			2,4,5-Trichlorophenol	D041	400.0 mg/L	
			2,4,6-Trichlorophenol	D042	2.0 mg/L	

The U.S. Environmental Protection Agency (EPA) has identified 40 toxic chemicals that can cause harm when products containing them are disposed in landfills and the chemicals leach out (40 CFR part 261). To determine the potential of specific wastes to leach dangerous concentrations of toxic chemicals into groundwater, the EPA developed a protocol known as the Toxicity Characteristic Leaching Procedure (TCLP).

Products containing one or more of the listed toxins are assessed using the TCLP to estimate how much of their toxic contents would be released into landfill leachate under ordinary conditions. If the amount of a particular chemical released under test conditions exceeds regulatory limits, the waste qualifies as hazardous and must be handled according to regulations governing hazardous waste, such as handling by certified disposal agents and recycling or disposing in specially designated landfills and incinerators. Products that do not leach toxic materials at levels exceeding regulatory limits are termed TCLP compliant.

# TCLP- Toxicity Characteristic Leaching Procedure

## Waste determination testing

It is the generator's responsibility to make this determination, but generators often contract outside labs to perform the TCLP test.



**The following questions and answers may be helpful to generators.**

**Question:** What is the effect on the TCLP results if we miss any of the holding times specified in the method, or if we do not perform the procedure exactly as written?

**Answer:** The TCLP is a method-defined parameter and, therefore, it must be performed as written. This includes meeting all specifications for holding and tumbling times. If the method is not performed as written, the results are not valid for the purposes of determining whether the waste is hazardous based on the toxicity characteristic.

However, if the holding times are not met *and* the results for the analyses are *over* the numerical limits in the toxicity characteristic (40 CFR 261.24), the data can be used by the generator to demonstrate that the waste failed the toxicity characteristic and therefore *must* be managed as a hazardous waste.

**Question:** What are the holding times for the samples before leaching, the leachates before extraction, and the extracts before analysis?

**Answer:** Three types of holding times are summarized in Sec. 8.5 of Method 1311. For the leachate that will be analyzed for:

- Organics (including volatiles, semivolatiles, and the herbicides), you have 14 days from the collection of the original sample until you have to start the leaching (extraction).
- For metals, you have 180 days from collection until leaching, except for mercury, where leaching must start within 28 days.
- Herbicides are grouped with the "semivolatiles" in Sec. 8.5 of the method, since both types of analytes are extracted with an organic solvent. Extraction of semivolatiles and herbicides from the leachate must start within seven days of completion of the leaching procedure.

The instrumental (determinative) analyses for:

- Semivolatiles and herbicides must be completed within 40 days of the completion of the solvent extractions. The determinative analyses for the volatiles must be completed within 14 days of the completion of the leaching procedure.
- Metals must be completed within 180 days of the completion of the leaching procedure, except for mercury, where analyses must be completed within 28 days of the completion of the leaching procedure.



# TCLP- Toxicity Characteristic Leaching Procedure

## Waste determination testing

### It passes lab testing, now what?

**Question:** My waste passes the TCLP, does that mean my waste is not hazardous?

**Answer:** The waste could still be hazardous due to another characteristic (flammable, corrosive, reactive), or it may be a listed hazardous waste. To find step-by-step assistance on how to make a waste determination, see

[www.fedcenter.gov/assistance/facilitytour/hazardous/whatis/flowchart/](http://www.fedcenter.gov/assistance/facilitytour/hazardous/whatis/flowchart/)

- B = Volume of the liquid portion of the sample (L).
- C = Concentration of the analyte in solid portion of the sample (mg/kg)
- D = Weight of the solid portion of the sample (kg)
- E = Maximum theoretical concentration in leachate (mg/L)

The value obtained (E) can be used to show that the maximum theoretical concentration in a leachate from the waste could not exceed the concentration specified in the toxicity characteristic (TC) (40 CFR 261.24). In addition, if the total constituent analysis results are below the TC limits without dividing by 20, then the same argument holds true, i.e., the maximum theoretical concentration in the leachate could not exceed the TC limits.

## Total Constituent Analysis instead of TCLP Analysis

**Question:** Is it acceptable to perform a total constituent analysis instead of a TCLP analysis and then divide the total concentration by 20 to determine if a waste is non-hazardous, as is implied in Section 1.2 of Method 1311, TCLP?

**Answer:** Section 1.2 of the TCLP does allow for a total constituent analysis in lieu of the TCLP extraction. If a waste is 100 percent solid, as defined by the TCLP method, then the results of the total constituent analysis may be divided by 20 to convert the total results into the maximum leachable concentration. This factor is derived from the 20:1 liquid-to-solid ratio employed in the TCLP. If a waste has filterable liquid, then the concentration of the analyte in each phase (liquid and solid) must be determined. The following equation may be used to calculate this value:

$$\frac{[A \times B] + [C \times D]}{B + [20 \text{ (L/kg)} \times D]} = E$$

Where:

- A = Concentration of the analyte in liquid portion of the sample (mg/L)

### Do I have to test for all the chemicals listed in 40 CFR 261.24?

Waste streams should be tested for constituents that are reasonably expected to be present. For example, if a facility had a parts washer, the parts washer may reasonably be expected to contain leachable metals. (Chromium or cadmium is often a coating or constituent from bearings, pistons, or other metal products.) Since pesticides would not reasonably be expected to be present in normal parts washer operations, do not test for any of the pesticides that are in 40 CFR 261.24.

If you have a waste that is absolutely unknown, you will need to test for all the TC constituents listed in 40 CFR 261.24. This situation could occur, for example, if a 55 gallon drum of unknown liquid was abandoned on your property and you could not find the original owner. This waste would need a full determination for the TC constituents and other characteristics.

# **ATTACHMENT 4**

# IKEA NEW HAVEN

## PHOTOVOLTAIC SYSTEM - CARPORT SHADE STRUCTURES

450 SARGENT DRIVE, NEW HAVEN, CT 06511



**DSD**   
DISTRIBUTED SOLAR DEVELOPMENT, LLC  
200 HARBORSIDE DRIVE, STE 200  
SCHENECTADY, NY 12305

 APPLIED  
ENGINEERING CONSULTANTS, INC.

SEAL & SIGNATURE  
  
6/2/2021, 10:40:34 AM  
As design professional in  
responsible charge.

SYSTEM SPECIFICATIONS	
PANEL MODEL	Q. PEAK DUO L-G6 3 420
NUMBER OF MODULES	3,886
SYSTEM POWER, KWSTC	1,632.12
TIILT	5°
AZIMUTH	124° / 304°
CANOPY ARRAY SQUARE FOOTAGE	90,998
UTILITY	UNITED ILLUMINATING CORP
PERMITTING AUTHORITY	CT SITING COUNCIL
ZONING	PDD 100

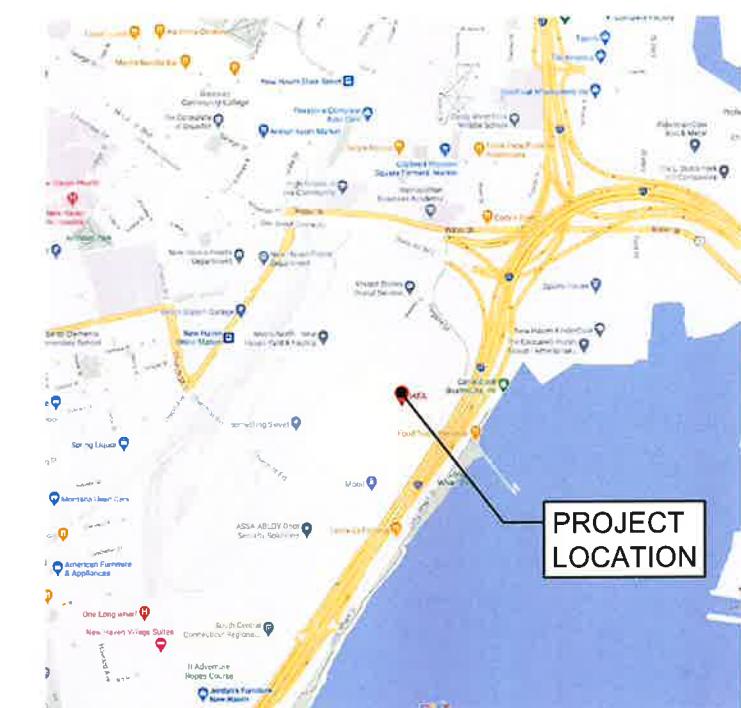


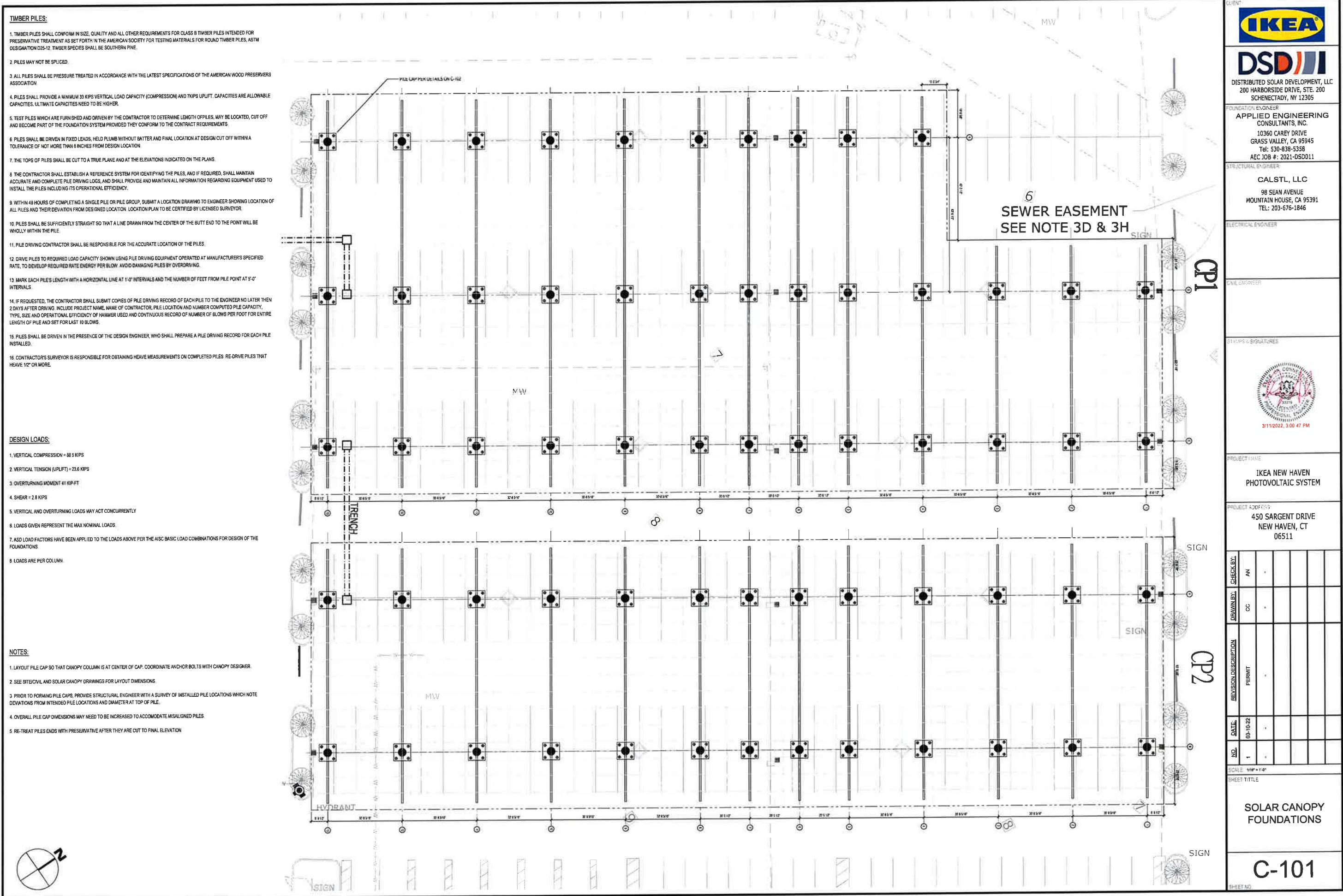
SHEET INDEX:	
G-001	TITLE SHEET
A-100	OVERALL SITE PLAN
A-101	ENLARGED SITE PLAN
A-102	ENLARGED SITE PLAN
A-200	TYPICAL SECTIONS
A-300	TYPICAL ELEVATIONS

PROJECT NAME: IKEA NEW HAVEN  
PROJECT ADDRESS: 450 SARGENT DRIVE  
NEW HAVEN, CT  
06511

NO.	DATE	REVISION DESCRIPTION	DRAWN BY:	CHECKED BY:	AN
1	6/2/2021	CT SITTING COUNCIL REV 1	CC		
SCALE:					
SHEET TITLE:					
TITLE SHEET					
SHEET NO.:					
G-001					
TOTAL NUMBER OF SHEETS:					

PROJECT TEAM	
<b>CLIENT:</b>	<b>GENERAL CONTRACTOR:</b>
IKEA PROPERTY, INC 450 ALAN WOOD RD CONSHOHOCKEN, PA 19428	DISTRIBUTED SOLAR OPERATIONS, LLC DBA DSD CONSTRUCTION 200 HARBORSIDE DRIVE SUITE 200 SCHENECTADY, NY 12305
<b>ENVIRONMENTAL CONSULTANT:</b>	<b>SURVEYOR:</b>
ALL-POINTS TECHNOLOGY CORPORATION, P.C. 587 VAUXHALL STREET EXTENSION - SUITE 311 WATERFORD, CONNECTICUT 06385	LOUREIRO ENGINEERING ASSOCIATES, INC. 100 FORT HILL RD., STE. 3 GROTON, CT 06340
<b>DESIGN PROFESSIONAL IN CHARGE:</b>	<b>GEOTECHNICAL FIRM:</b>
REX ARASHI, P.E. APPLIED ENGINEERING CONSULTANTS, INC. 10360 CAREY DR. GRASS VALLEY, CA 95945	DOWN TO EARTH CONSULTING, LLC 122 CHURCH STREET NAUGATUCK, CONNECTICUT 06770





Project 7a

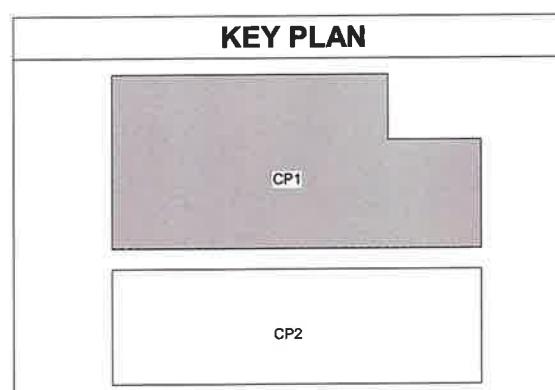
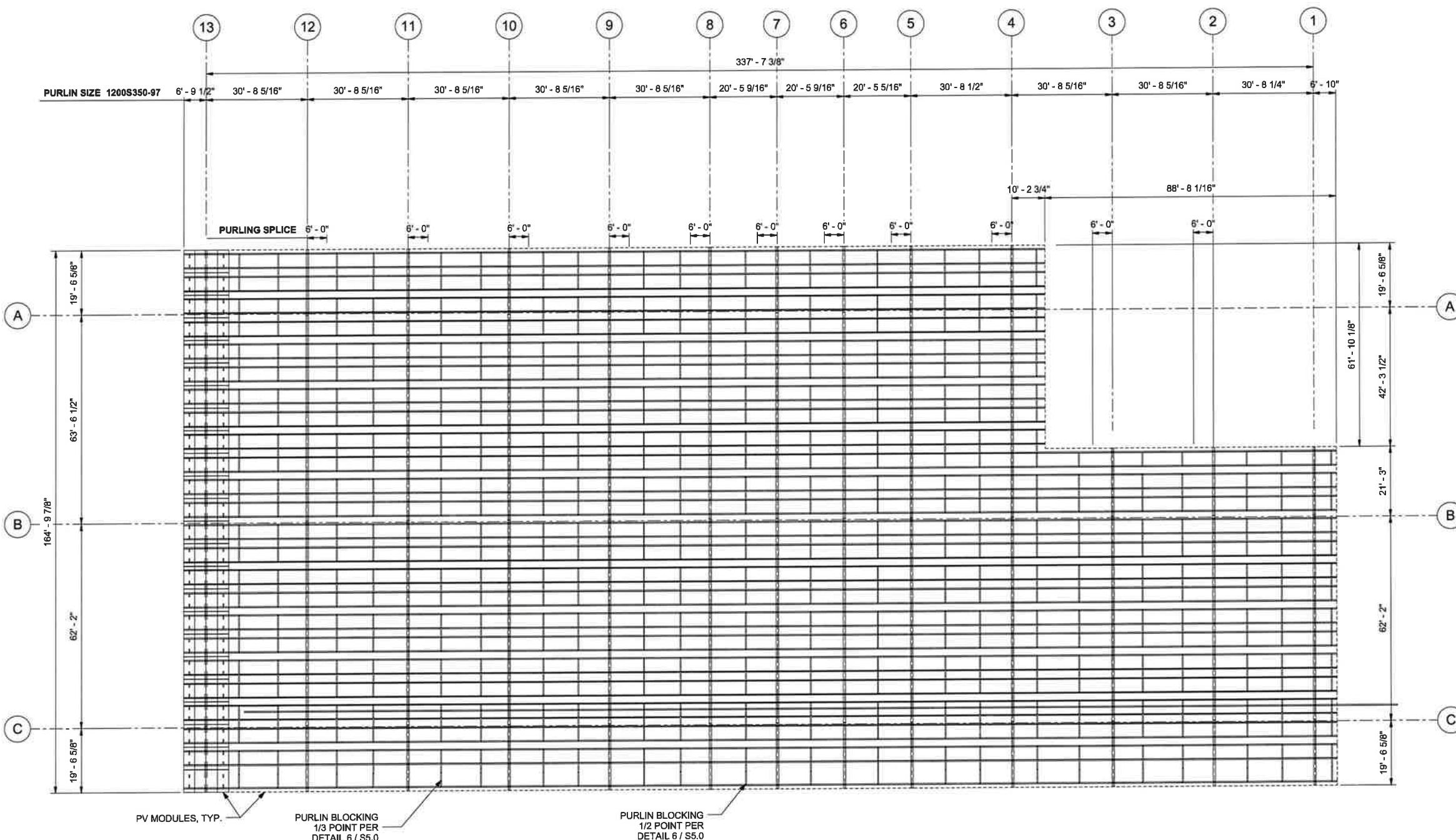
01/11/2022

IKEA NEW HAVEN,  
CT. SOLAR CANOPY

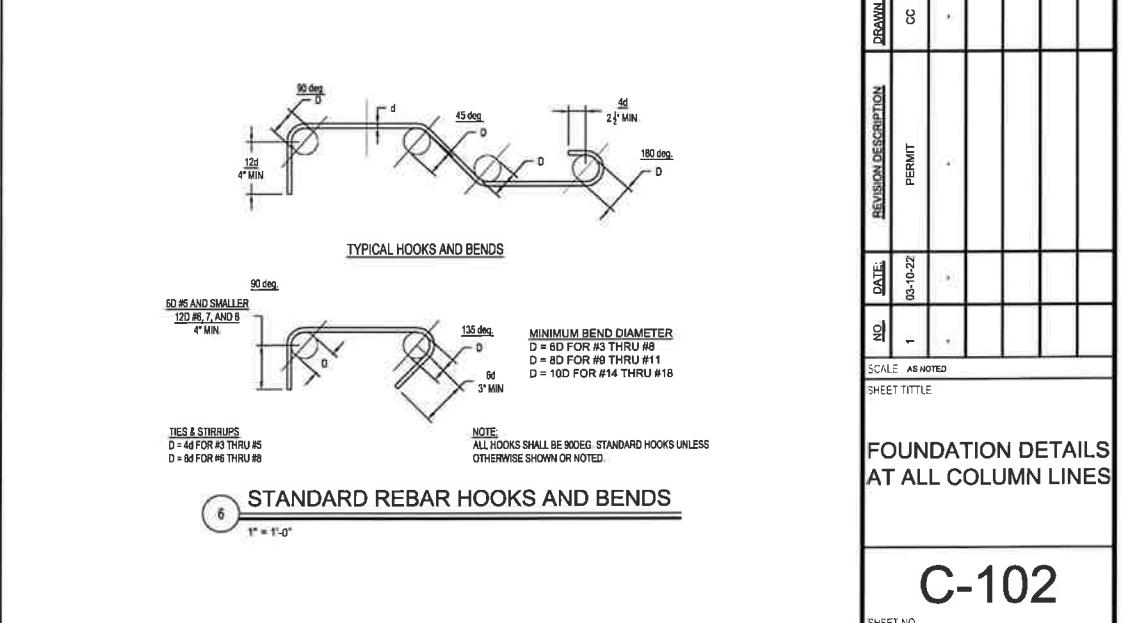
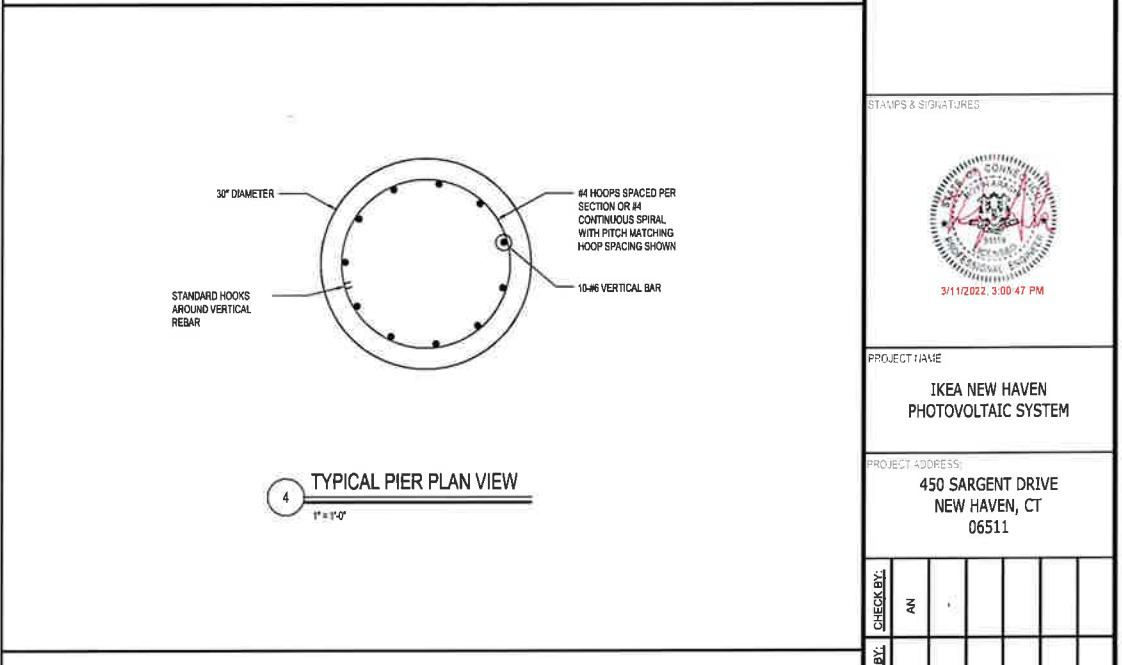
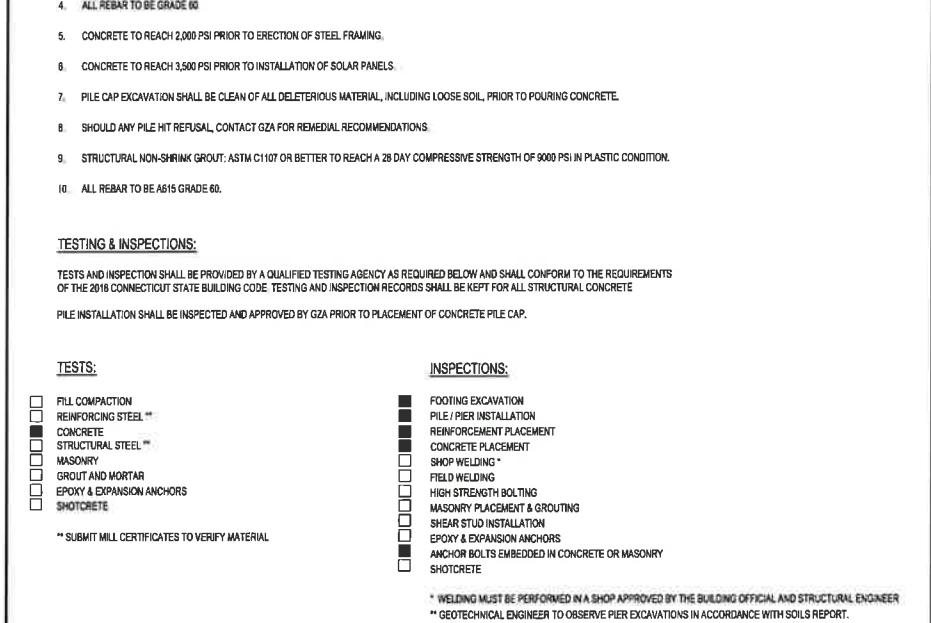
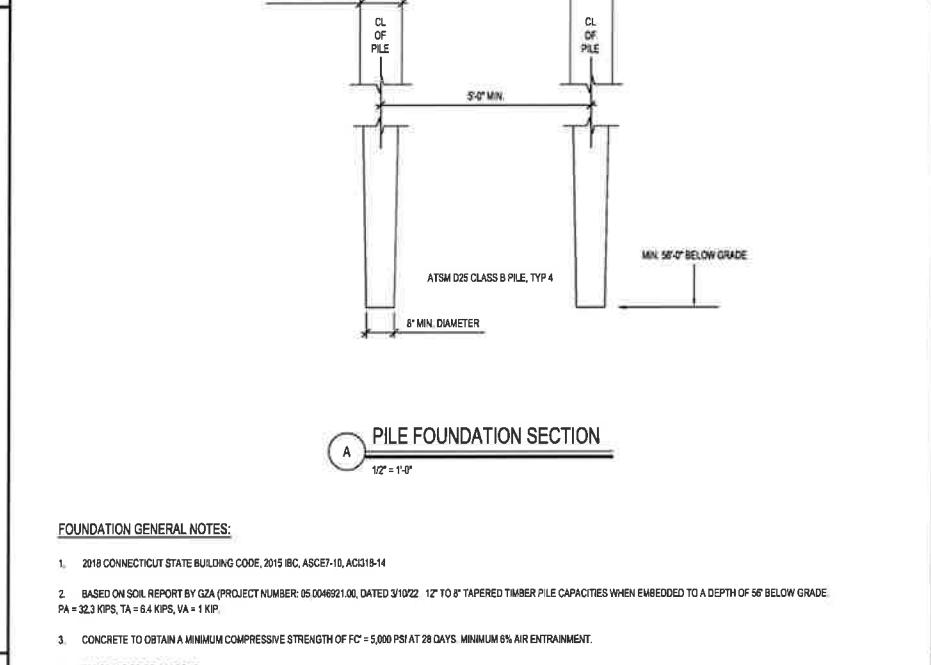
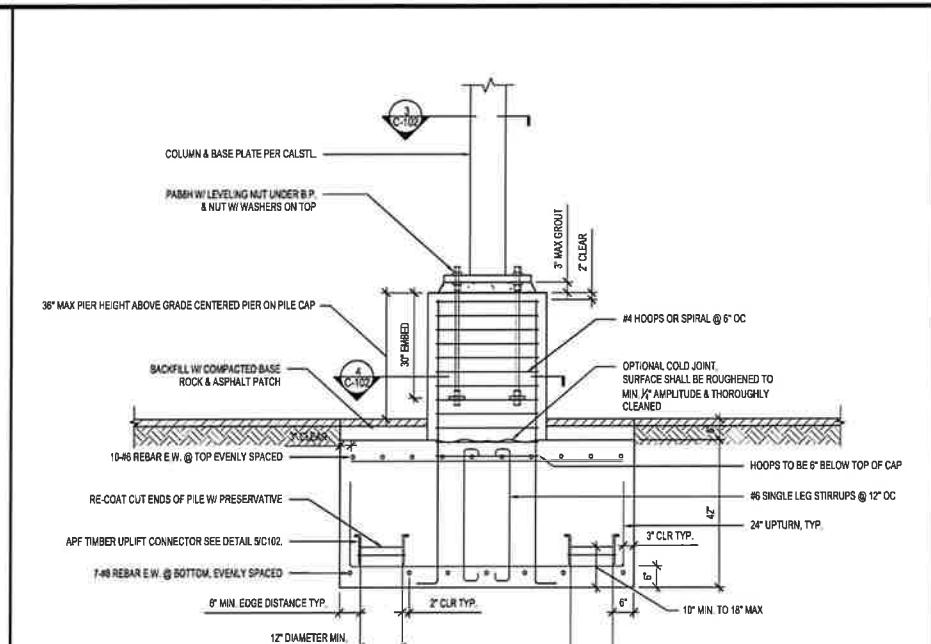
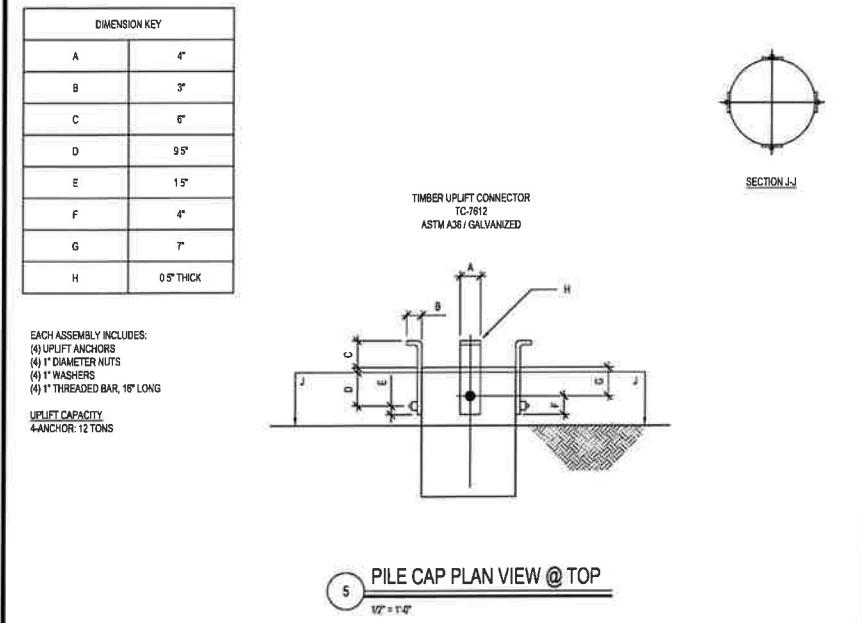
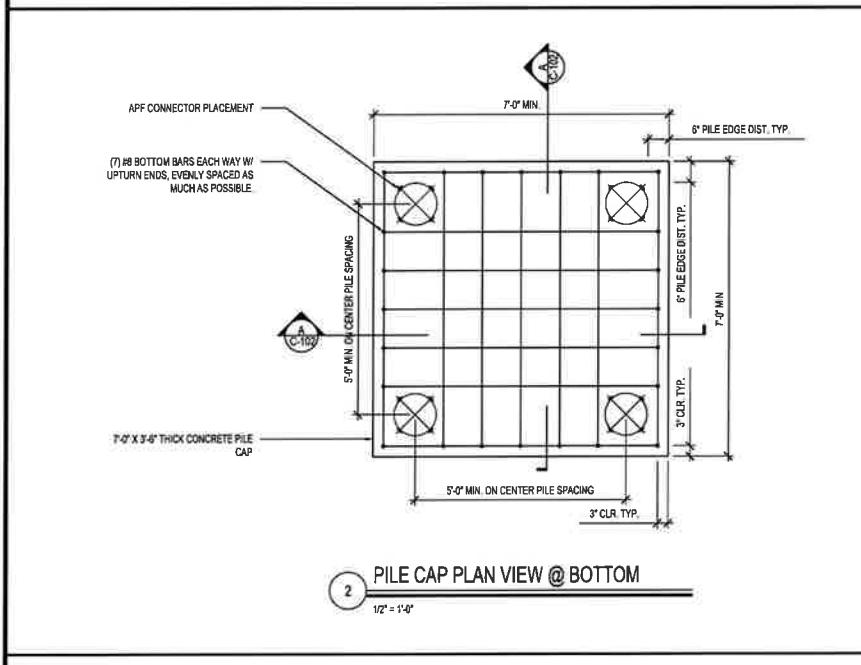
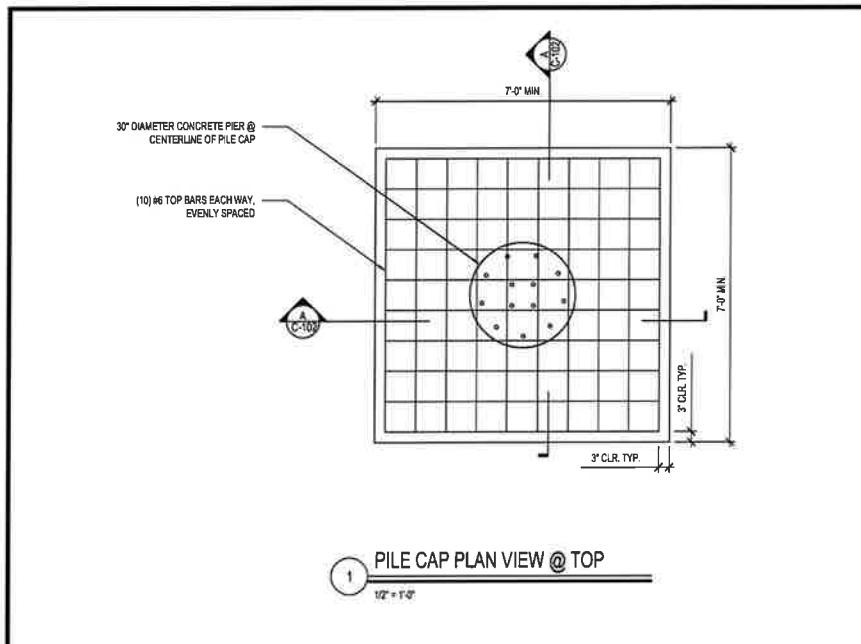
450 SARGENT DRIVE  
NEW HAVEN, CT 06511

Scale As indicated  
**SECONDARY ROOF  
FRAMING PLAN -  
CP1**

## S1.1







CLIENT:  
**IKEA**  
**DSD** / **DISTRIBUTED SOLAR DEVELOPMENT, LLC**  
200 HARBORSHIDE DRIVE, STE. 200  
SCHENECTADY, NY 12305

FOUNDATION ENGINEER  
**APPLIED ENGINEERING**  
CONSULTANTS, INC.  
10360 CAREY DRIVE  
GRASS VALLEY, CA 95945  
Tel: 530-839-5358  
AEC Job #: 2021-DSD011

STRUCTURAL ENGINEER  
**CALSTL, LLC**  
98 SEAN AVENUE  
MOUNTAIN HOUSE, CA 95391  
TEL: 203-676-1846

ELECTRICAL ENGINEER

CIVIL ENGINEER

STAMPS & SIGNATURES  
  
3/11/2022, 3:00:47 PM

PROJECT NAME  
**IKEA NEW HAVEN**  
**PHOTOVOLTAIC SYSTEM**

PROJECT ADDRESS:  
450 SARGENT DRIVE  
NEW HAVEN, CT  
06511

DRAWN BY:	CHECKED BY:
C.C.	A.N.
REVISION DESCRIPTION:	PERMIT
DATE:	03-10-22
NO.:	1
SCALE:	AS NOTED
SHEET TITLE:	

FOUNDATION DETAILS  
AT ALL COLUMN LINES

**C-102**

SHEET NO.

## VACINITY MAP



## SHEET INDEX

S0.1	COVER
S0.2	GENERAL NOTES
S1.0	PRIMARY ROOF FRAMING PLAN - CP1
S1.1	SECONDARY ROOF FRAMING PLAN - CP1
S1.2	PRIMARY ROOF FRAMING PLAN - CP2
S1.3	SECONDARY ROOF FRAMING PLAN - CP2
S2.0	CROSS SECTION
S2.1	CROSS SECTION
S3.0	COLUMN DETAILS
S4.0	RAFTER DETAILS
S5.0	PURLIN DETAILS
S5.1	MEMBER SIZES

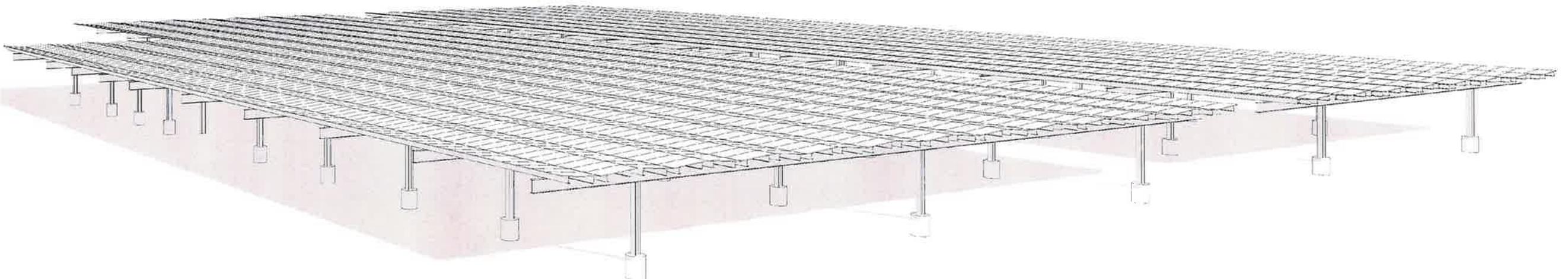
## BUILDING INFORMATION

BUILDING DATA:
CONSTRUCTION TYPE
TYPE OF CONSTRUCTION: I-I-8
DESCRIPTION OF USE: SOLAR SUPPORT STRUCTURES
OCCUPANCY: GENERAL, IN RESPONSIBLE CHARGE TO PROVIDE CODE ANALYSIS

### INSPECTIONS:

1. SHOP WELDING INSPECTION MAY NOT BE REQUIRED IF THE FABRICATOR IS AISC CERTIFIED. THE JURISDICTION HAVING AUTHORITY OR THE PROJECT OWNER MAY STILL REQUIRE SHOP WELDING INSPECTION.
2. SPECIAL INSPECTION IS REQUIRED FOR HIGH STRENGTH BOLTS. THE TURN OF THE NUT METHOD OF TIGHTENING IS RECOMMENDED, UNDER THE SUPERVISION OF AN INDEPENDENT TESTING LABORATORY. ALTERNATE METHODS OF TIGHTENING MAY BE USED AS PERMITTED BY THE AISC SPECIFICATION.

## 3D VIEW



CALSTL, LLC

ANSHUMAN SRH DEV  
ENGINEERING@CAL-STL.COM  
209.676.1846

Project No. 999-0



03/11/2022

01/11/2022

Report:

IKEA NEW HAVEN,  
CT. SOLAR CANOPY

450 SARGENT DRIVE  
NEW HAVEN, CT 06511

Scale: 1/8" = 1'-0"

COVER

S0.1

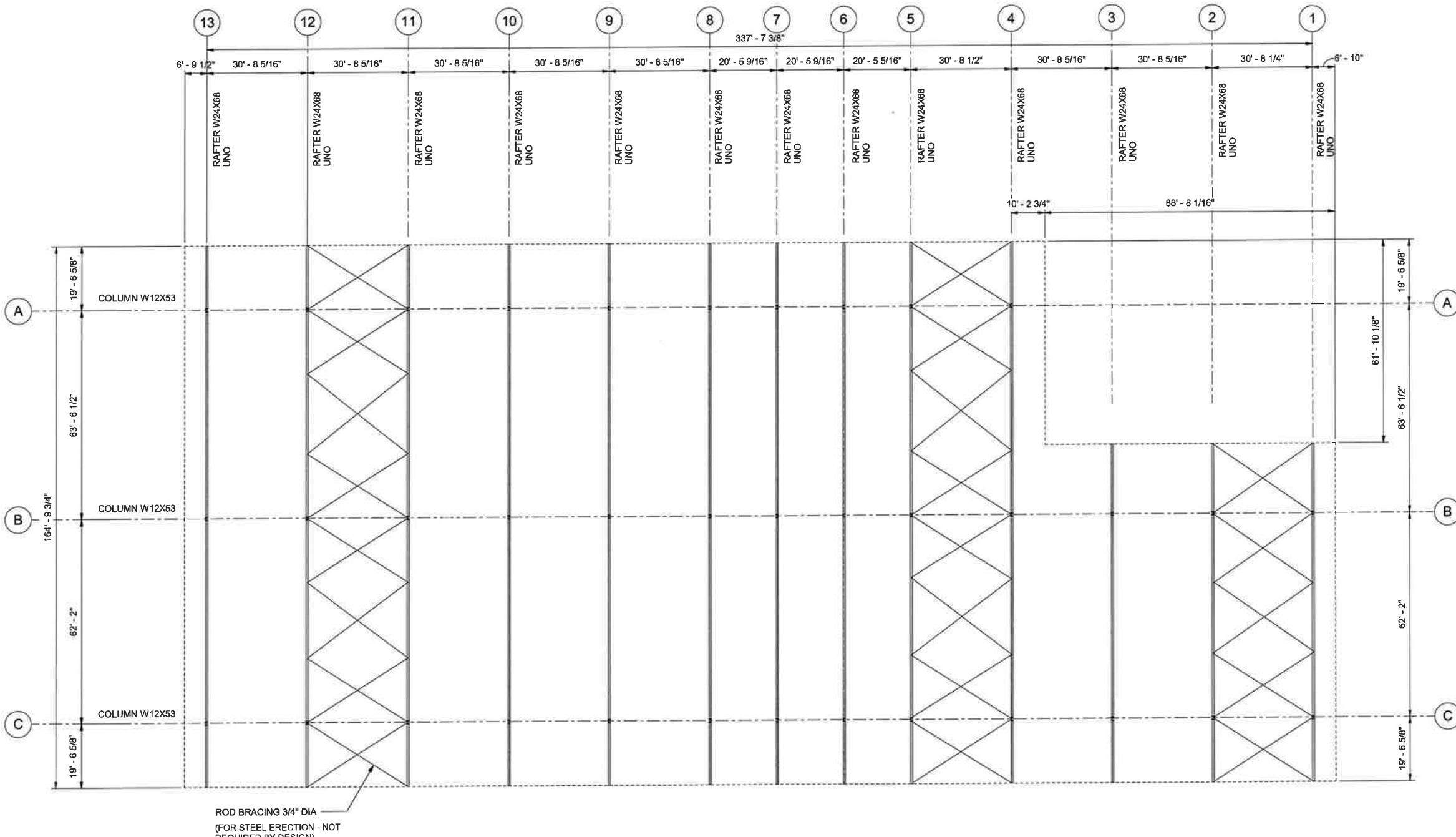
Sheet No. 02021





01/11/2022

Revisions:

IKEA NEW HAVEN,  
CT. SOLAR CANOPY450 SARGENT DRIVE  
NEW HAVEN, CT 06511

## KEY PLAN



Scale As indicated  
PRIMARY ROOF  
FRAMING PLAN -  
CP1

S1.0



CALSTL, LLC

ANSHUMAN SENDEY  
ENGINEERING@CAL-STL.COM  
203.676.1946

Practise 899-0



03/11/2022

01/11/2022

Remarks

109'-10 1/4"

62'-8 1/2"

23'-7 7/8"

23'-6 7/8"

COLUMN W12X53

COLUMN W12X53

A2

B2

A2

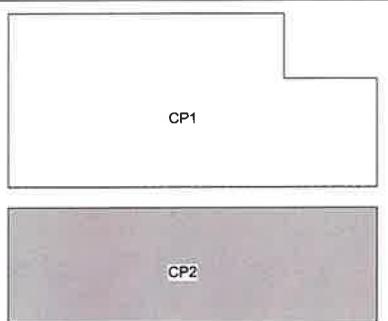
B2

ROD BRACING 3/4" DIA  
(FOR STEEL ERECTION - NOT  
REQUIRED BY DESIGN)

IKEA NEW HAVEN,  
CT. SOLAR CANOPY

450 SARGENT DRIVE  
NEW HAVEN, CT 06511

KEY PLAN



Scale As indicated

PRIMARY ROOF  
FRAMING PLAN -  
CP2

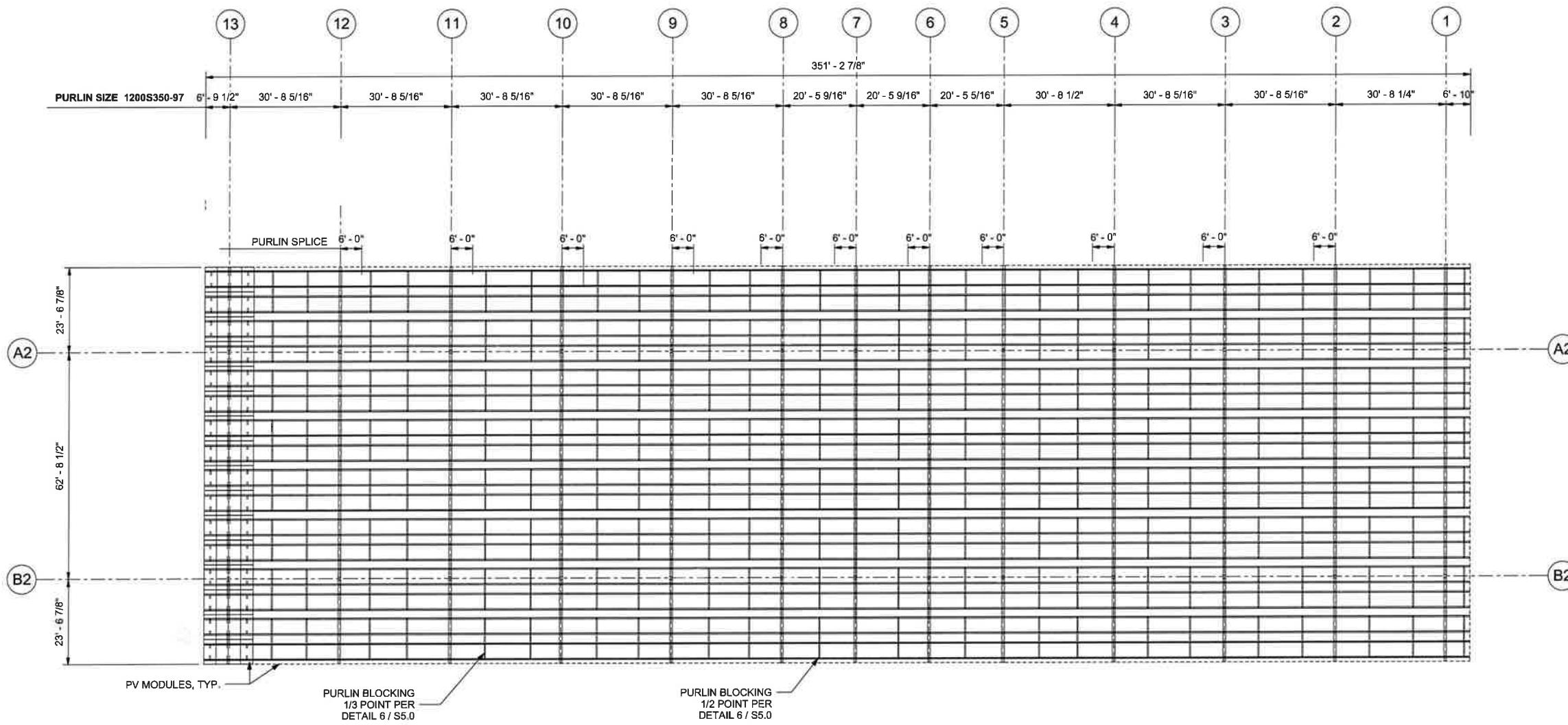
S1.2



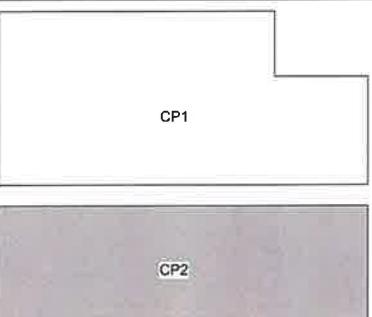


01/11/2022

Remarks

IKEA NEW HAVEN,  
CT. SOLAR CANOPY450 SARGENT DRIVE  
NEW HAVEN, CT 06511

## KEY PLAN

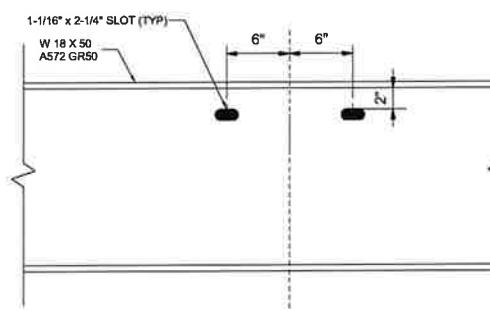
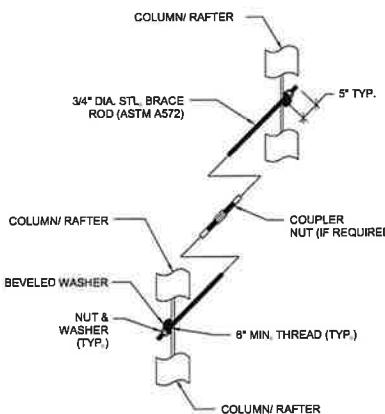
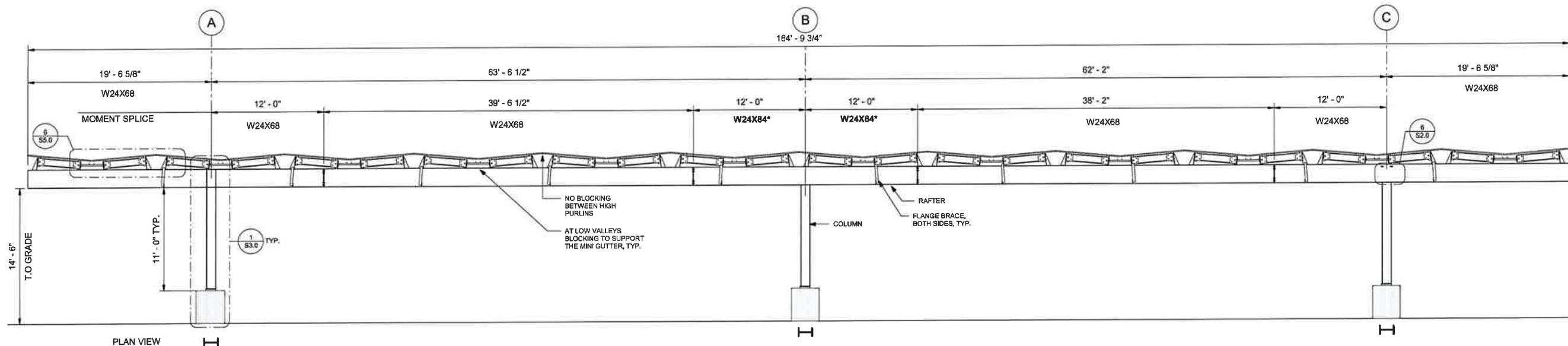
Scale As indicated  
SECONDARY ROOF  
FRAMING PLAN -  
CP2

S1.3

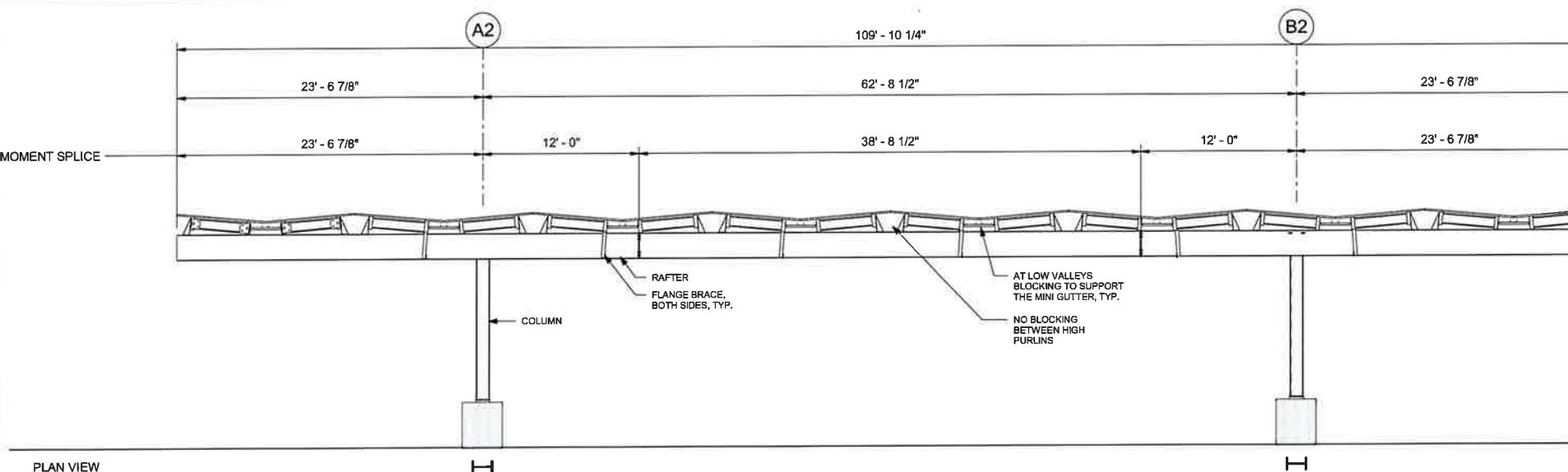


01/11/2022

Reviews

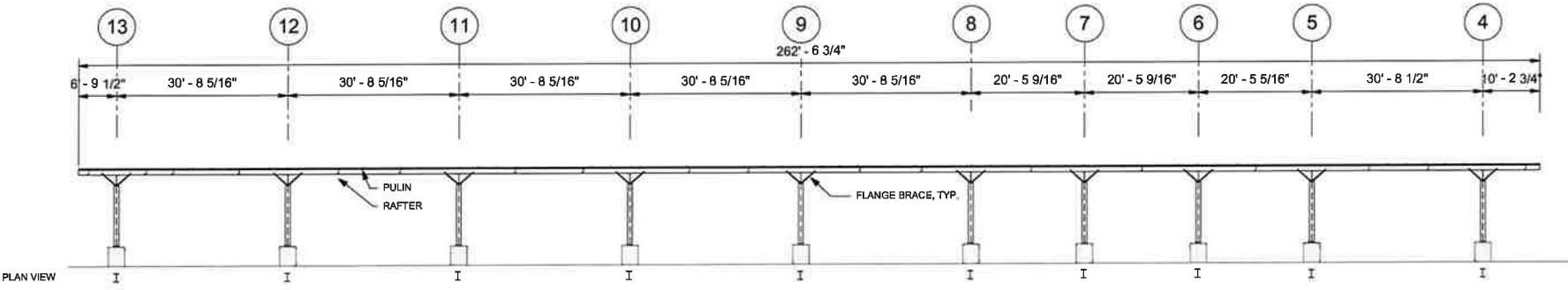
6 BRACING HOLE PUNCH DETAIL  
1 1/2" = 1'-0"3 ROD BRACE DETAIL  
3/4" = 1'-0"5 CROSS SECTION @ CP1  
3/16" = 1'-0"

NOTE: " \* " INDICATES SPECIAL SIZES

4 CROSS SECTION @ CP2  
3/16" = 1'-0"IKEA NEW HAVEN,  
CT. SOLAR CANOPY450 SARGENT DRIVE  
NEW HAVEN, CT 06511

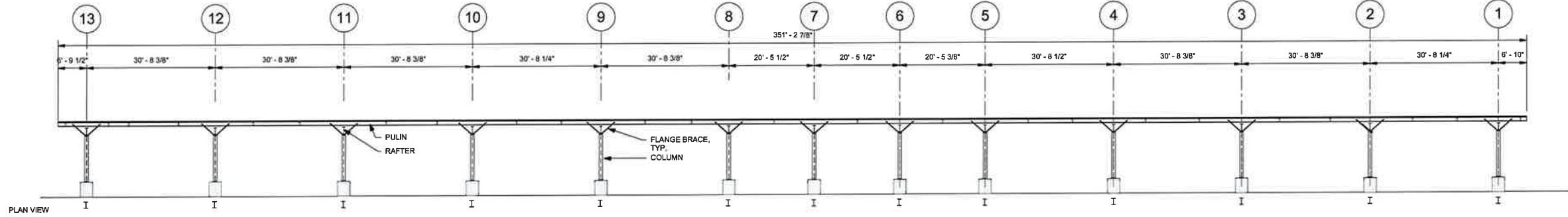
CALSTL, LLC

ANSHUMAN SEHDEV  
ENGINEERING@CAL-STL.COM  
209.676.1846



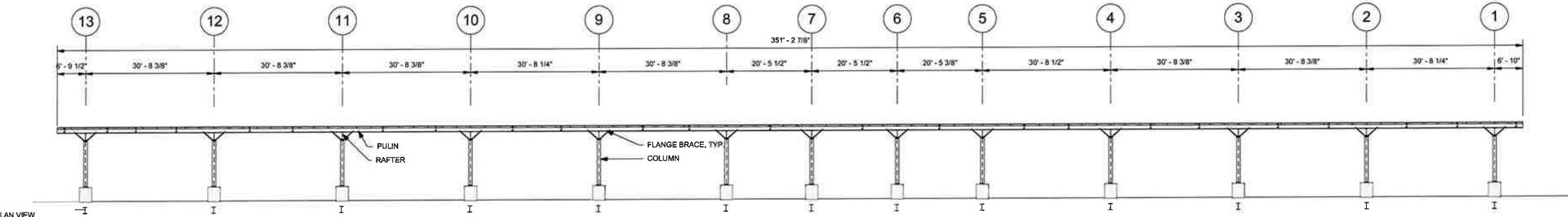
1 SECTION THRU GRID LINE "A" - CP1  
1:160

03/11/2022



2 SECTION THRU GRID LINE "B & C" - CP1  
1:160

01/11/2022



IKEA NEW HAVEN,  
CT. SOLAR CANOPY

450 SARGENT DRIVE  
NEW HAVEN, CT 06511

3 SECTION THRU GRID LINE "A2 & B2" - CP2  
1:160

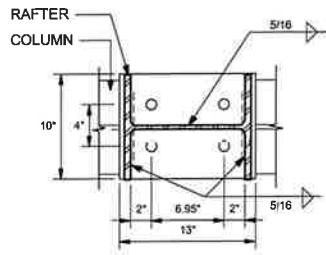
Scale 1:160

CROSS SECTION

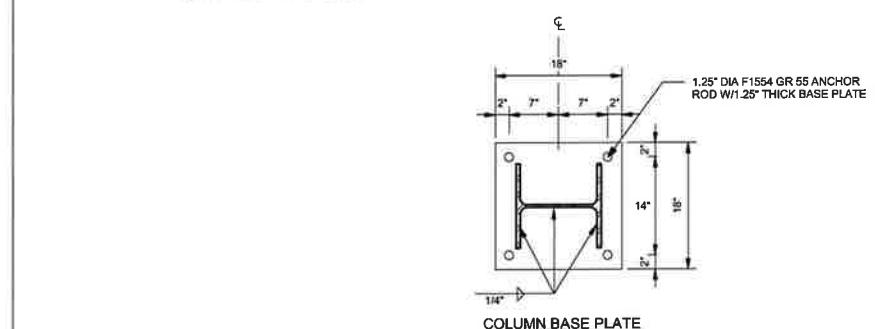
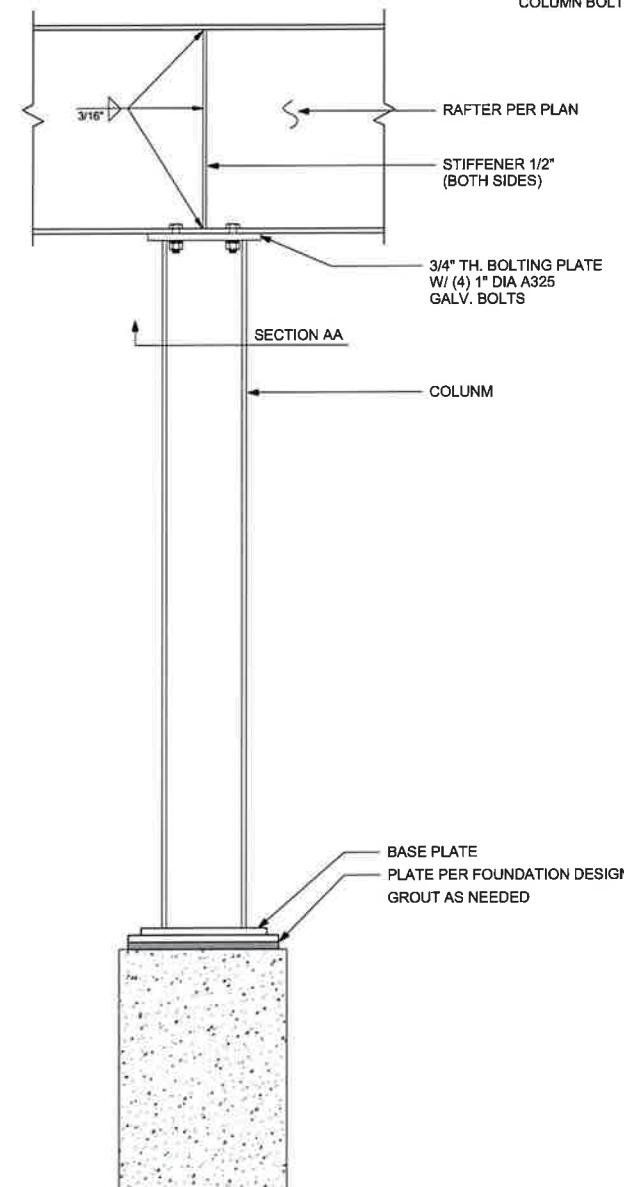
S2.1

## GENERAL NOTES

- THE ANCHOR BOLT AND BASE PLATE SIZES ARE PROVIDED BASED ON STEEL DESIGN ONLY.
- THE FINAL DESIGN AND SPECIFICATION OF THE ANCHOR BOLT, BASE PLATE AND GROUT IS THE RESPONSIBILITY OF FOUNDATION ENGINEER. SEE FOUNDATION DRAWINGS.
- THE WELDING OF THE BASE PLATE TO LEVELING OR CAP PLATE IS PER FOUNDATION ENGINEER
- TYP ALL PLACES:  
EDGE DISTANCE CAN BE ADJUSTED AS NEEDED



SECTION AA  
COLUMN BOLTING PLATE



1 COLUMN BEAM AND BASE DETAILS  
1" = 1'-0"

**CALSTL, LLC**

ANSHUMAN SEHDEV  
ENGINEERING@CAL-STL.COM  
209.676.1846



01/11/2022

Revisions  
Sheet No. 008-0

IKEA NEW HAVEN,  
CT. SOLAR CANOPY

450 SARGENT DRIVE  
NEW HAVEN, CT 06511

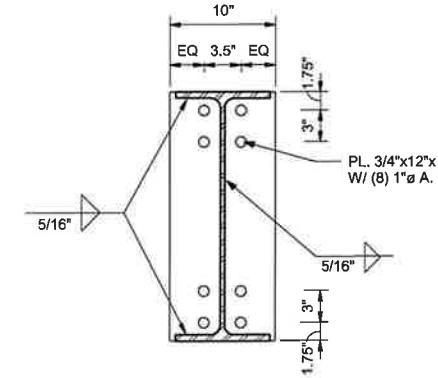
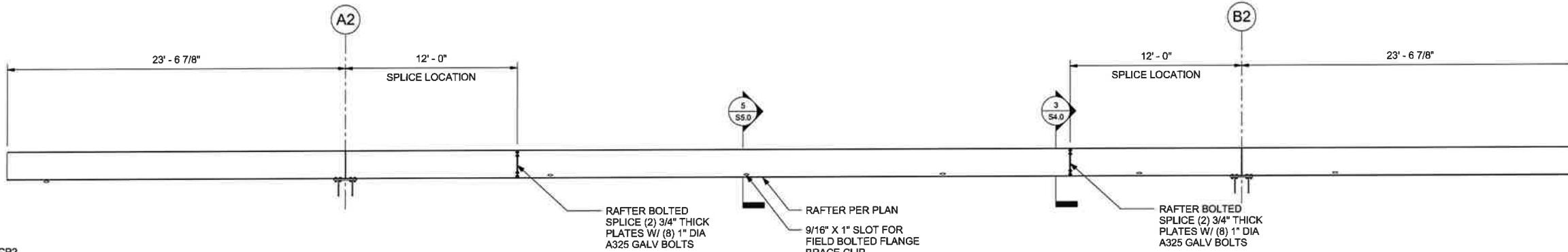
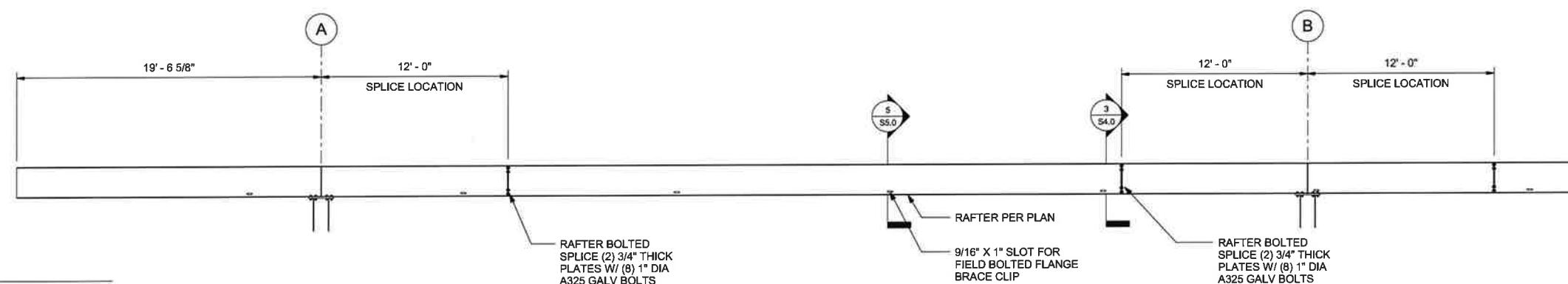
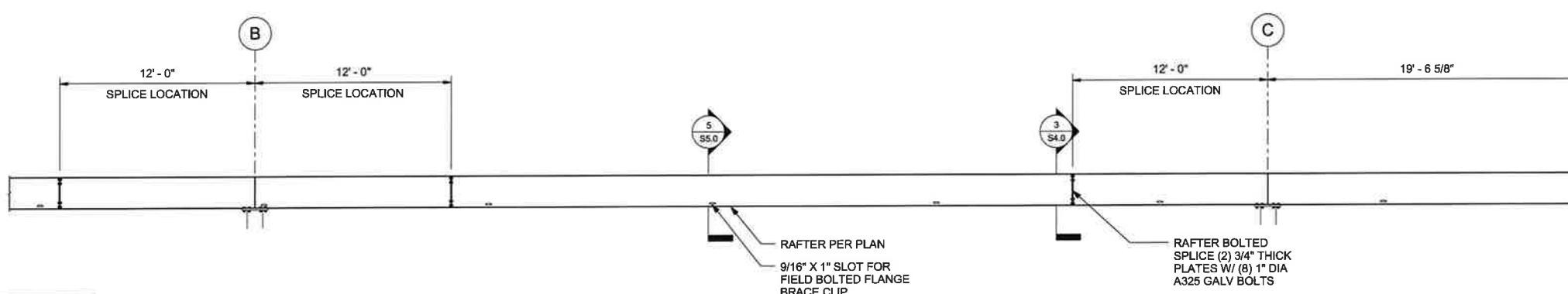
Sheet No. 008-0  
COLUMN DETAILS

**S3.0**



03/11/2022

01/11/2022

3 Rafter bolted splice detail  
1 1/2" = 1'-0"1 Rafter detail - CP2  
1/4" = 1'-0"11 Rafter detail - CP1  
1/4" = 1'-0"IKEA NEW HAVEN,  
CT. SOLAR CANOPY450 SARGENT DRIVE  
NEW HAVEN, CT 0651110 Rafter detail - CP1  
1/4" = 1'-0"

Rafter details

S4.0

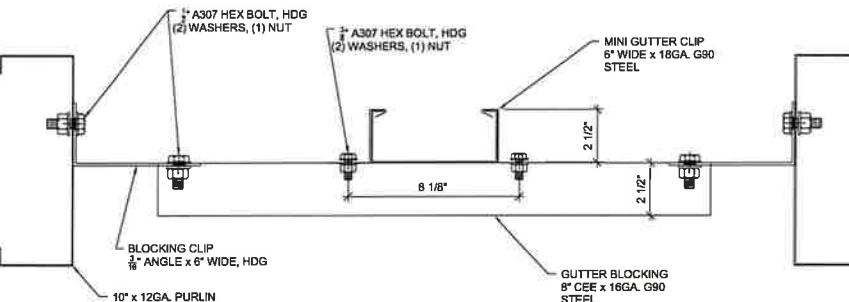


03/11/2022

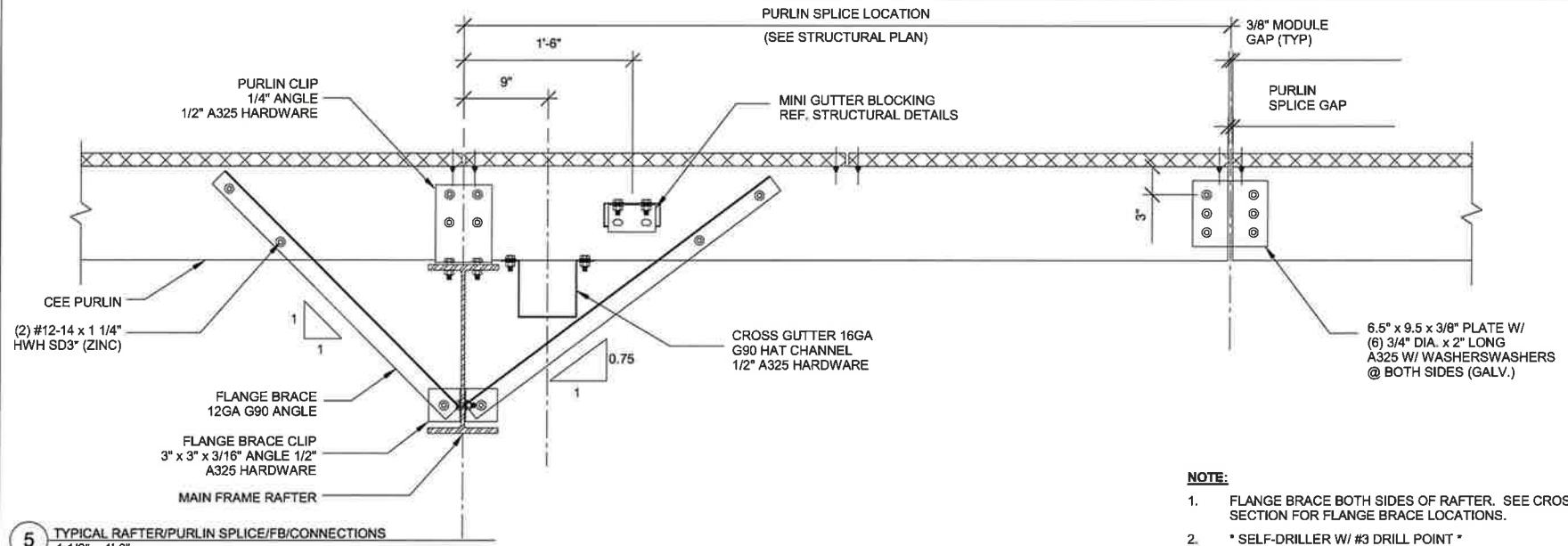
01/11/2022

Answers

**6 MUDULE TO ANGLE RAILS**  
 $1\frac{1}{2}'' = 1'-0''$



**8 MINI GUTTER BLOCKING DETAIL**

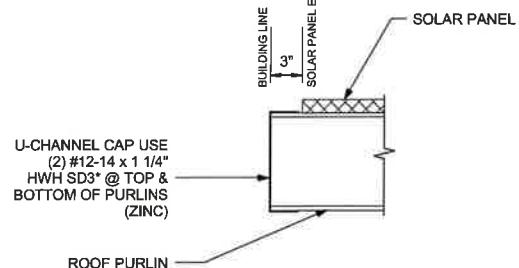


**NOTE:**

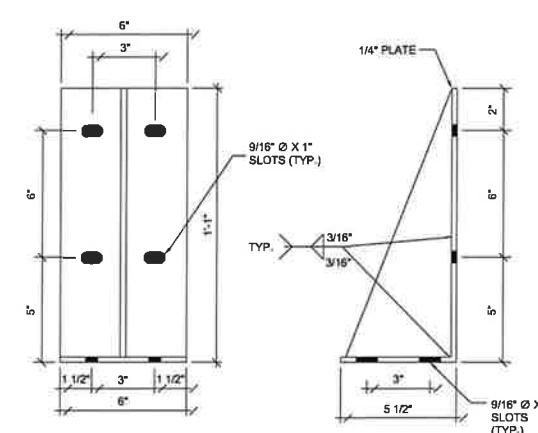
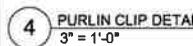
1. FLANGE BRACE BOTH SIDES OF RAFTER. SEE CROSS SECTION FOR FLANGE BRACE LOCATIONS.
2. \* SELF-DRILLER W/ #3 DRILL POINT \*

IKEA NEW HAVEN,  
CT. SOLAR CANOPY

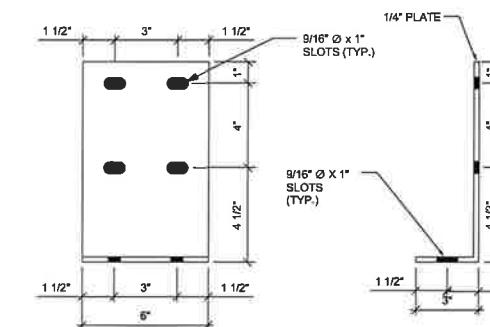
450 SARGENT DRIVE  
NEW HAVEN, CT 06511



7 CHANNEL CAP DETAIL



**1** PURFLIN CLIP DETAIL  
3" = 1'-0"



## PURLIN DETAILS

S5.0

**CALSTL, LLC**

ANSHUMAN SEHDEV  
ENGINEERING@CAL-STL.COM  
205.678.1846



01/11/2022

**IKEA NEW HAVEN,  
CT. SOLAR CANOPY**

450 SARGENT DRIVE  
NEW HAVEN, CT 06511

Scale: As indicated

**MEMBER SIZES**

**S5.1**

PURLIN	<p>PURLIN, G90</p>	12005350-07					
RAFTER	<p>W24X68</p>		<p>W24X84</p>				
COLUMNS	<p>W12X53</p>						