



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

September 26, 2023

Jill Hodge
Manager – Contract and Legal Administration
FuelCell Energy
3 Great Pasture Road
Danbury, CT 06810
Jhodge@fce.com

RE: **PETITION NO. 1506** – SCEF1 Fuel Cell, LLC Declaratory Ruling, pursuant to Connecticut General Statutes §4-176 and §16-50k, for the proposed construction, maintenance and operation of a grid-side 2.8-megawatt fuel cell facility located at 49 Coon Hollow Road, Derby, Connecticut, and associated electrical interconnection to The United Illuminating Company's existing Ansonia Substation. **Compliance with Condition No. 6.**

Dear Jill Hodge:

The Connecticut Siting Council (Council) is in receipt of the notification for pipe cleaning procedure dated September 20, 2023 regarding compliance with Condition No. 6 of the Council's Declaratory Ruling of June 24, 2022 for the above-referenced facility.

The Council acknowledges that the condition has been satisfied. This acknowledgment applies only to the condition satisfied by the September 20, 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

From: Hodge, Jill <JHodge@fce.com>
Sent: Wednesday, September 20, 2023 1:14 PM
To: Bachman, Melanie <Melanie.Bachman@ct.gov>
Subject: Notification of Pipe Purge

Hello,

Please see attached letter regarding the pipe purge for the fuel cell located at 49 Coon Hollow Road in Derby.

Thank you.

Jill Hodge
Manager, Contract and Legal
Administration

D. 203.825.6091
E. JHodge@fce.com

3 Great Pasture Rd
Danbury, CT 06810

[Twitter](#) | [LinkedIn](#)



From: Hodge, Jill <JHodge@fce.com>
Sent: Wednesday, September 20, 2023 1:45 PM
To: Bachman, Melanie <Melanie.Bachman@ct.gov>
Subject: Notification of Pipe Purge - Attachment

Apologies, I neglected to send the attachment to the letter.

Jill Hodge
Manager, Contract and Legal
Administration

D. 203.825.6091
E. JHodge@fce.com

3 Great Pasture Rd
Danbury, CT 06810

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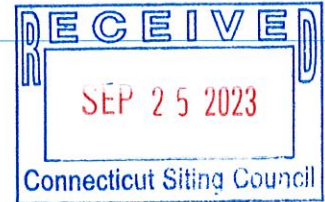
FuelCell Energy
3 Great Pasture Road
Danbury, CT 06810
www.fuelcellenergy.com



September 20, 2023

VIA EMAIL & U. S. MAIL

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



Re: PETITION NO. 1506 - FuelCell Energy, Inc., as agent for SCEF 1 Fuel Cell, LLC, petition for a Declaratory Ruling that no Certificate of Environmental Compatibility and Public Need is required for the construction, maintenance and operation of a grid-side 2.8-megawatt fuel cell facility located at 49 Coon Hollow Road, Derby, Connecticut, and associated electrical interconnection to The United Illuminating Company's existing Ansonia Substation

Dear Ms. Bachman:

ORIGINAL

In accordance with the decision in the above-referenced Petition and Public Act 11-101, An Act Adopting Certain Safety Recommendations of the Thomas Commission, FuelCell Energy, Inc., as general contractor and agent for SCEF 1 Fuel Cell, LLC, owner of the above-captioned project (the "Project"), is writing to advise the Council of certain pipe cleaning operations at the Project.

The attached pipe cleaning procedure specifies the method and media to be used to clean the natural gas piping. No known hazards are associated with the process. The pipe cleaning will be performed on October 6, 2023 by Notch Mechanical Constructors under the supervision of Philip E. Neveu, P.E. The attached procedure and identification of Mr. Neveu as the inspector has previously been submitted to the Town of Derby's Fire Marshal's office and, to date, no comments or concerns have been received. I hereby certify that a copy of this filing has been sent by first class mail, postage prepaid on this date to all state agencies listed in General Statutes Section 16-50j(g) and to the Department of Consumer Protection, Department of Labor, Department of Emergency Services and Public Protection, Department of Construction Services, and the Department of Emergency Management and Homeland Security.

If you have any questions with respect to the foregoing, please contact the undersigned. Thank you for your consideration.

FuelCell Energy
3 Great Pasture Road
Danbury, CT 06810
www.fuelcellenergy.com



Respectfully Submitted,

FUELCELL ENERGY, INC.
On behalf of
SCEF 1 Fuel Cell, LLC

By: Alexandrea L. Isaac
Alexandrea Isaac
Assistant General Counsel



MECHANICAL CONSTRUCTORS

PIPE FITTERS | PLUMBERS | CODEWELDERS

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

NOTCH

August 30, 2023

Job: FCE Little Derby SCEF-1 (DPW)

Location: 49 Coon Hollow Road, Derby, CT 06418

Re: FCE Little Derby SCEF-1 (DPW) - 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 valve.

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 the 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:



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TEL: 413-534-3440 | FAX: 413-534-4111 | notch.com

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 – Chris Strong, (860) 508-3300

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:

VERMONT

MASTER PLUMBER PM-03659

NATURAL GAS INSTALLER CN-03448 (H)

CONNECTICUT

MECHANICAL CONTRACTOR MEC-0001094

UNLIMITED HEATING, PIPING & COOLING HTG-0369811-S1

PLUMBING & PIPING UNLIMITED PLM-0280742-P1

MASSACHUSETTS

MASTER PIPEFITTER PM-000335

MASTER PLUMBER 13152

REFRIGERATION CONTRACTOR RC-019404

SPRINKLER CONTRACTOR SC-007053

RHODE ISLAND

MASTER PIPEFITTER I-00006620

MASTER PLUMBER MP-002173

MASTER REFRIGERATION 100007427

NEW HAMPSHIRE

MASTER PLUMBER 3965



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- Chemical Hazards
- Materials at the site
- Materials brought to the site Physical Hazards Fire/explosion Slip/trip/fall
- Electrocutation
- 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 the mechanical air blower at the entrance of the 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.



MECHANICAL CONSTRUCTORS
 PIPE FITTERS | PLUMBERS | CODEWELDERS
 65 LEMAY STREET | CHICOPEE MA 01013-2236
 TEL. 413-534-3440 | FAX: 413-534-6111 | 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 city 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 skid at the branch isolation ball valve.
- 7) A deflector will be installed on the isolation valve to direct any debris from the pipe exit to the ground.
- 8) Danger tape will be installed around the perimeter, a 30ft radius from the discharge location.
- 9) All non-essential personnel are prohibited from entering the cordoned-off areas during this procedure.
- 10) All workers involved in this work will attend a pre-procedure briefing where this procedure will be reviewed.
- 11) HV-600 and the branch isolation valve shall now be fully opened to allow the blow.
- 12) The blow procedure will persist until the isolation branch has been cleared of debris.
- 13) After cleaning is complete the 3” line will be filled with nitrogen between HV-600 and the branch isolation valve and left pressurized at 2-5psi as outlined in NFPA 54-8.3.1.2. The 3” line will be purged in accordance with NFPA 54-8.3.2.1 “Placing in Operation” as indicated by FCE during the fuel cell startup.
- 14) Once the piping has been cleared of debris and filled with nitrogen, it may be refastened to the local utility and fuel cell skid.
- 15) Once the gas line has been reconnected to the fuel cell and the city’s let down spool, the Gas Utility LOTO may be removed.
- 16) The strainer and additional piping spools will be hand cleaned and inspected prior to the commissioning of the system.

Thank you,

Patrick J. Silva
 Design Engineer

Philip E. Neveu, P.E.
 VP – Engineered Construction



VERMONT
 MASTER PLUMBER PM 03553
 NATURAL GAS INSTALLER CN 05448 (H)

MASSACHUSETTS
 MECHANICAL CONTRACTOR MEC 0061094
 UNLIMITED HEATING, PIPING & BOILING HFC 036981 (S)
 PLUMBING & PIPING UNLIMITED PLM 0280743 (P)

MASSACHUSETTS
 MASTER PIPEFITTER PM-000335
 MASTER PLUMBER 13152
 REFRIGERATION CONTRACTOR RC-019404
 SPRINKLER CONTRACTOR SC-001053

MASSACHUSETTS
 MASTER PIPEFITTER I-00005020
 MASTER PLUMBER MP 002173
 MASTER REFRIGERATION 100007427

NEW HAMPSHIRE
 MASTER PLUMBER SP05