



STATE OF CONNECTICUT
CONNECTICUT SITING COUNCIL

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VIA ELECTRONIC MAIL

September 5, 2024

Steve Pearson
VFS, LLC
5827 Terex
Clarkstown, MI 48346
spearson@vfsmi.com

RE: **PETITION NO. 1620** - VFS, LLC Declaratory Ruling, pursuant to Connecticut General Statutes §4-176 and §16-50k, for the construction, maintenance and operation of a 920-kilowatt customer-side fuel cell facility and associated equipment located at the York Correctional Institution, 199 West Main Street, East Lyme (Niantic), Connecticut.
Compliance with Condition Nos. 2 and 4.

Dear Steve Pearson:

The Connecticut Siting Council (Council) is in receipt of your correspondence dated September 3, 2024 regarding compliance with Condition Nos. 2 and 4 of the Declaratory Ruling issued by the Council on July 18, 2024 for the above-referenced facility. The correspondence includes a detailed site plan and the spill prevention plan in accordance with Condition Nos. 2 and 4, respectively.

Therefore, the Council acknowledges that Condition Nos. 2 and 4 have been satisfied. This acknowledgment applies only to the conditions satisfied by the September 3, 2024 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.

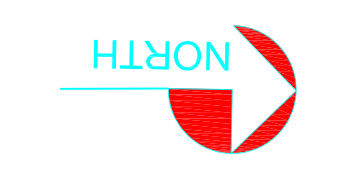
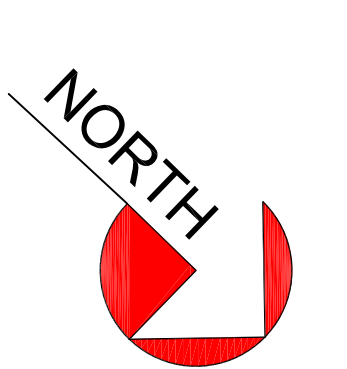
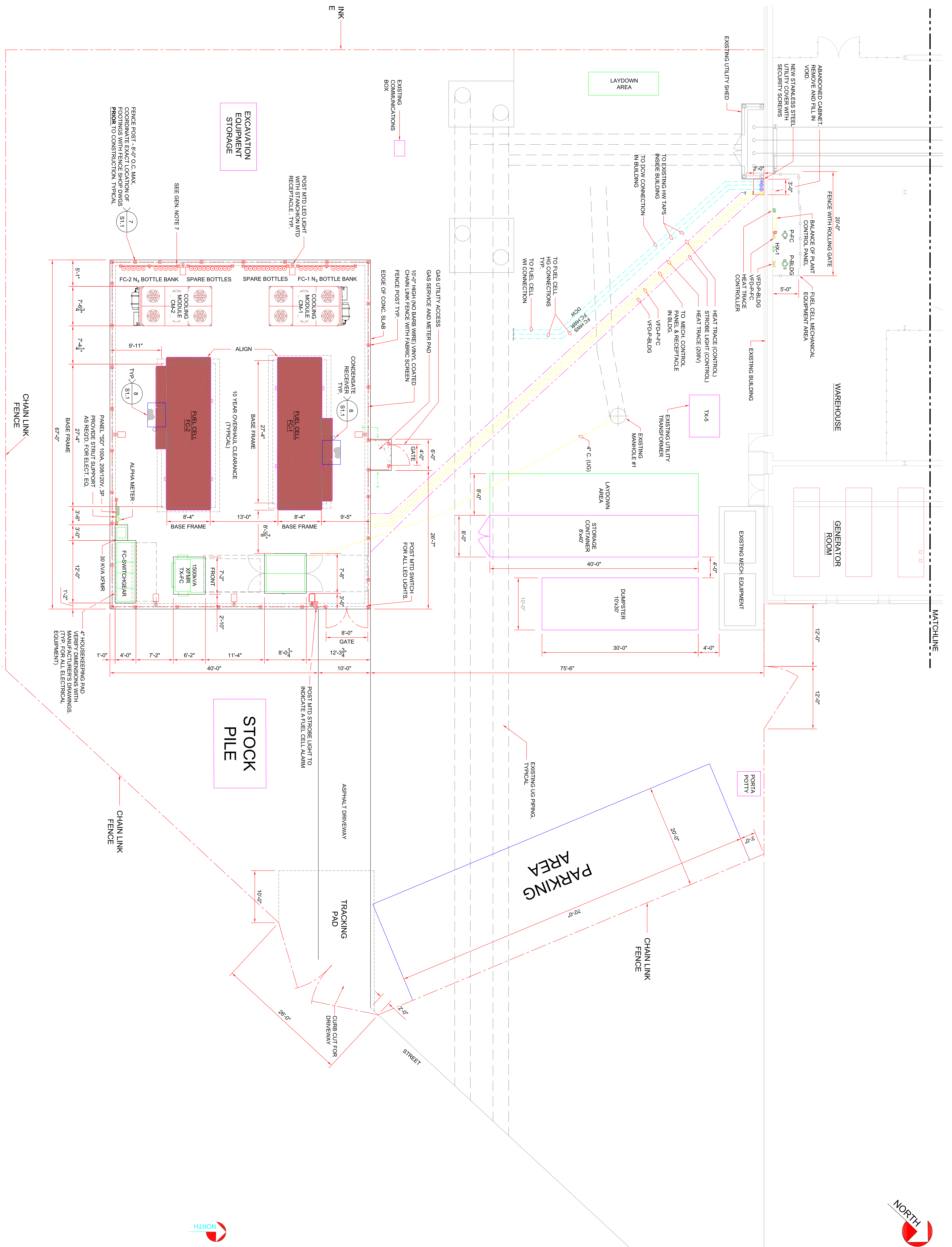
Sincerely,

A handwritten signature in dark ink, appearing to read "Melanie A. Bachman".

Melanie A. Bachman
Executive Director

MAB/RDM/dll

c. Service List, dated March 15, 2024



Rev.	Date	Description
C	09/03/24	REVISED PER SARRACCO MECHANICAL
B	07/11/24	REVISED PER STATE COMMENTS
A	04/05/2024	ISSUED FOR PERMIT

ICDS
Innovative Construction & Design Solutions, LLC

10 White Wood Lane
N. Branford, CT 06471

Phone: (203) 453-8596
Email: info@icdsllc.com

YORK CORRECTIONAL INSTITUTION
NIANTIC, CT
FUEL CELL INSTALLATION

GENERAL ARRANGEMENT

GA1.0

Project No.: DSF
Drawn By: DSF

Date: 04/05/2024
Design By: DSF

Scale: AS NOTED
Check By: DSF

Drawing No.: DSF

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Spill Prevention & Emergency Response Plan

Emergency Contact Information

Emergency Response Contact(s):	Fire/Paramedics/Police/Hazmat:	911
	Poison Control (24/7)	1-800-222-1222
Emergency Contact(s):	Seth Slomka Sarracco Safety Director	203-528-8142

Additional Resources:

Material Safety Data Sheets: www.msds.com

Hazardous Substance Management:

All hazardous substances, including chemical wastes, are to be managed in a way that prevents release. The following general requirements are to be followed. They include:

Container Management:

- All hazardous substance containers must be in good condition and compatible with the materials stored within.
- All hazardous substance containers must be accessible and spacing between containers must provide sufficient access to perform periodic inspections and respond to releases.
- Empty hazardous substance containers (drums) must have all markers and labels removed and the container marked with the word 'empty'.
- Any spills on the exterior of the container must be cleaned immediately.
- Flammable materials stored or dispensed from drums or totes must be grounded to prevent static spark.
- Do not overfill waste drums. 4" of headspace must remain to allow for expansion

Good Housekeeping:

- All hazardous substances must be stored inside buildings or under cover.
- Store hazardous substances not used daily in cabinets, or in designated areas.
- All chemicals that are transferred from larger to smaller containers must be transferred by use of a funnel or spigot.
- All hazardous substance containers should be closed while not in use.
- Use drip pans or other collection devices to contain drips or leaks from dispensing containers or equipment.
- Implement preventative maintenance activities to reduce the potential for release from equipment.
- Immediately clean up and properly manage all small spills or leaks.
- Periodically inspect equipment and hazardous substance storage areas to ensure leaks or spills are not occurring.
- Use signage to identify hazardous substance storage or waste collection areas.
- Keep all work areas and hazardous substance storage areas clean and in good general condition.

- *Secondary containment:*

- Store all bulk chemicals (≥ 55 gallons) within appropriate secondary containment, or any sized chemical if there is a potential for release to the environment.
- Secondary containment should be checked periodically, and any spills identified in secondary containment must be immediately cleaned up and removed.
- *Marking/labeling:*
 - Ensure all hazardous substances, including chemical wastes, are properly marked and labeled in accordance with all federal, state and local regulations.
 - Ensure that hazardous substances transferred to small containers are marked with the chemicals name (example- "Isopropyl Alcohol") and hazard (example- "Flammable").

Employee Training: All employees must receive periodic training in the proper handling of hazardous substances; spill prevention practices, and emergency response procedures. Training must include a review of the spill prevention and emergency response plan, and a review of location and use of emergency response equipment. Training can be recorded through safety committee meetings, staff training logs, or other equivalent record keeping.

Hazardous Substance Inventory: An inventory must be maintained for all hazardous substance stored in quantity (<55 gallons), and/or list of locations where non-bulk hazardous substances are stored (flammable lockers- shop floor).

Spill Response Equipment: Spill response equipment must be maintained and located in areas where spills are likely to occur. Spill kits should provide adequate response capabilities to manage any anticipated spill or release. The following general requirements are to be followed: They include:

- Stock spill clean-up kits that are compatible with hazardous substances stored on site.
- Locate spill kits in areas where spills are likely to occur (loading docks, chemical storage areas, locations where hazardous substances are being transferred).
- Spill kits should be sized to manage an anticipated release (spill equal to the largest container).
- Emergency response equipment should be inspected periodically to ensure that the spill kit is complete.

Emergency Response Plan:

The Emergency Response Plan is a facility specific plan for dealing with emergencies and shall be implemented immediately whenever there is a fire, explosion, or release of a hazardous substance that threatens human health or the environment. The emergency response plan shall be reviewed and immediately amended whenever:

- The plan fails in an emergency.
- The facility changes in its design, construction, operation, maintenance, or other circumstances in a way that increases the potential for fire, explosions, or release of a hazardous substance.
- The list of emergency contacts changes; or
- The list of emergency equipment changes.

Response actions in the event of a spill or release:

In the event of a hazardous substance spill or release, immediately take the following measures to keep the spill from entering sewer or storm drains, spreading off-site, or affecting human health. In all cases caution and common sense must be maintained with the primary goal being to prevent and/or limit personal injury.

Stop, contain, and clean up the chemical spill if:

- The spilled chemical and its hazardous properties have been identified.
- The spill is small and easily contained.
- Responder is aware of the chemicals' hazardous properties.

If a spill cannot be controlled or injuries have occurred due to the release the following procedures should be implemented:

- Summon help or alert others of the release.
- Evacuate the immediate area and provide care for the injured - Call 911.
- If potential fire or explosion hazards exist initiate evacuation procedures - Call 911.
- Respond defensively to any uncontrolled spills:
 - Use appropriate personal protective equipment when responding to any spill.
 - Attempt to shut off the source of the release (if safe to do so).
 - Eliminate sources of ignition (if safe to do so).
 - Protect drains by use of adsorbent, booms or drain covers (if safe to do so).
- Notify onsite emergency contact(s).
- Notify other trained staff to assist with the spill response and cleanup activities.
- Coordinate response activities with local emergency personnel (fire/HAZMAT).
- Be prepared to provide SDS information to fire department, EMT, hospital or physician.
- Notify the appropriate agency if a release has entered the environment. Refer to Notification and Reporting section for reporting thresholds.

Evacuation Procedures:

In the event of a hazardous substance release that has the potential for fire, explosion or other human health hazards the following procedures will be implemented:

- Facility staff will be notified of evacuation by one or more of the following methods: **Verbal, Intercom, Portable Radio, Alarm, or Phone**
- Notification to emergency services will be performed- Call 911.
- Facility staff will follow predetermined evacuation routes and assemble at designated areas.
- Individuals responsible for coordinating evacuations must confirm if the business has been completely evacuated.
- Staff will be made familiar with evacuation procedures during new employee orientation, and annual trainings thereafter.
- Designated emergency response contacts will coordinate all activities with outside emergency personnel.

Spill Cleanup and Disposal:

In the event of a hazardous substance release spill cleanup materials are to be properly characterized to determine if it designates as dangerous waste. The designated onsite emergency contact, with the assistance of other resources will determine the waste's status prior to disposal.

Reporting a Release:

If a hazardous substance spill has been released to soil, surface water, drains or air the following notifications (within 24-hours) must be performed:

- **Fire Department** (any release that poses an immediate threat to human health, property or the environment).
- **National Response Center** (release of oil or fuel to surface water, or a release of a chemical with an established Reportable Quantity-RQ).

When reporting a release prepare to provide the following information (use spill report form):

- Your name and telephone number from where you are calling.
- Exact address of the release or threatened release.
- Date, time, cause and type of incident (fire, air release, spill, etc.)
- Material and quantity of the release, to the extent known.
- Current condition of the facility.
- Extent of injuries, if any; and
- Possible hazards to the public health and/or environment outside of the facility.