



TOWN OF KILLINGWORTH

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

March 22, 2019

RE: 1.98 MW Photo-voltaic generating facility
Chatfield Solar Fund, LLC
Killingworth, CT
Petition No 1354

Chairman Stein:

I have been in contact with the development company representatives on at least 3 occasions to discuss each of my concerns as stated in my January 2, 2019 letter. To date none of the concerns have been addressed to my satisfaction.

The provisions of Chapter 18 have not been adequately addressed in the proposal as required by the 2018 CT State Fire Safety Code (effective October 1, 2018) which is based upon the 2015 Edition of NFPA 1 Fire Code. Chapter 18 Fire Department Access: Access to the site with the provisions of fire access roads adequate in design and maintained to support the imposed loads of fire apparatus shall be provided with an all-weather driving surface have not been addressed in the proposal, (18.2.3.4.2). The proposed site plan contains a bridge to cross a water feature within the complex. As required under the CT Fire Code (18.2.3.4.5.2), The Bridge shall be designed for a live load sufficient to carry the imposed loads of fire apparatus. I have received no documentation regarding the bridge design proposed for the complex.

The total size of the installation (16+acres) and the scope of the photo-voltaic generating facility (5700+ panels & multiple inverter locations) as an unattended installation, would increase the prospect of a delay in reporting any fire incident on site which increases the risk of fire spread.

As I have stated previously, the town of Killingworth has no municipal water supply within the town. Due to the inadequate access to the site as currently proposed I would require an onsite water supply be installed, as provided by the CT Fire Code (18.2.3.1.4) "the AHJ shall be authorized to require additional fire protection features".

Such an onsite water supply and its' requirements are covered in NFPA 1142, Standard on Water Supplies for Suburban and Rural Fire Fighting, 2012 Edition.

Additionally, the CT Fire Code in Chapter 11 has the following provisions for Ground Mounted Photovoltaic System Installations (11.12.3).

Clearances, A clear area of 10 ft. around a ground mounted photovoltaic system shall be provided (11.12.3.1).

Noncombustible Base, A gravel base or other noncombustible base acceptable to the AHJ shall be installed and maintained under and around the installation. (11.12.3.2).

Security Barriers, Fencing, Skirting or other suitable security barriers shall be installed when required by the AHJ (11.12.3.3).

In my discussions to date with the site developer, related to the above referenced requirements, they have rejected the installation of a noncombustible material under and around the installation citing environmental concerns without providing any documentation that the DEEP would object to the enforcement of this CT Fire Code provision.

I have expressed concerns related to the proposed single point of access to the site for ground personnel within the security barrier (2900+feet in length). The placement of Firefighters on the ground within such a large facility (16+ acres) could create a situation where they would be cut off from a means of escape. This would also be true for other onsite personnel within the complex. The site development company agreed that a number of personnel gates could be installed over the length of the security barrier.

The unresolved issues cited above have significant consequences to effectively provide fire protection to the proposed Photo-voltaic generating facility. As such, the proposed plan if approved would be in violation of the 2018 CT Fire Code.

Thank you for the opportunity to submit these additional comments to the Council regarding the proposed 1.98 MW Photo-voltaic generation facility.

Respectfully yours,

James McDonald
Fire Marshal
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