

DEVELOPMENT AND MANAGEMENT (D&M) PLAN

for

Beacon Falls Energy Park

October, 2016

Prepared by

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Table of Contents

Section	Page
CROSS REFERENCE TABLE	iii
1.0 INTRODUCTION	1
1.1 Project Description	1
1.2 Plan Organization	2
2.0 REGULATORY APPROVALS AND CONSULTATIONS	3
2.1 Regulatory Approvals and Requirements	3
2.2 Consultations	3
3.0 CONSTRUCTION INFORMATION	5
3.1 Project Facilities and Land Requirements	5
3.2 Construction Management and Contact Information	5
3.3 Construction Work Hours	5
3.4 Site Preparation	5
3.5 Blasting Procedures	6
3.6 Erosion and Sediment Controls	6
3.7 Clearing and Landscaping	7
4.0 NOTICES AND REPORTS	9
4.1 Staging and Material Laydown Areas	9
4.2 Notices to the Council	9
4.3 Notice of Beginning	10
4.4 Notices of Changes	10
4.5 Notice of Completion	10
4.6 Notice to Municipalities	11
4.7 Notice to Landowners	11
4.8 Monthly Reports	11
4.9 Final Report	11
5.0 ADDITIONAL ELEMENTS PER COUNCIL ORDER	13
5.1 Reduction in Paved Surfaces	13
5.2 Access Drive on Lopus Road	13
5.3 Sound Mitigation Barrier	14
5.4 Excavation and Characterization of Soils in Former Disposal Area	14
5.5 Eastern Hognose Snake Protection Program	16
5.6 Field Habitat Assessment Report	18
5.7 Construction Work Hours	19
5.8 Air Permitting	19
5.9 Infrastructure Decommissioning Plan	20
6.0 PROJECT SCHEDULE	21

FIGURES

1 Key Map

APPENDICES

Appendix A CSC January 7, 2016 Decision and Order, Petition No. 1184
Appendix B Drawings
Appendix C June 18, 2015 SHPO Response Letter
Appendix D July 23, 2015 Inland Wetland and Watercourse Impact Assessment
Appendix E Contractor Contact Information
Appendix F January 2016 Noise Assessment Report
Appendix G NDDB Final Determination No.: 201609163 with the Field Habitat
Assessment Report
Appendix H Analysis of Best Available Control Technology (DEEP-NSR-APP-214a)
Appendix I Infrastructure Decommissioning Plan
Appendix J Project Schedule

Citation	Description	Plan Cross Reference
Sec. 16-50j-60. Requirements for a Development and Management Plan (D&M Plan)		
(a)	<p>Purpose. The Council may require the preparation of full or partial Development and Management Plans (D&M Plans) for proposed energy facilities, modifications to existing facilities, or where the preparation of such a plan would help significantly in balancing the need for adequate and reliable utility services at the lowest reasonable cost to consumers with the need to protect the environment and ecology of the state.</p>	Section 2.1
(b)	<p>When required. A partial or full D&M Plan shall be prepared in accordance with this regulation and shall include the information described in Sections 16-50j-61 to 16-50j-62, inclusive, of the Regulations of Connecticut State Agencies, for any proposed energy facility for which the Council issues a certificate of environmental compatibility and public need, except where the Council provides otherwise at the time it issues the certificate. Relevant information in the Council's record may be referenced.</p>	Section 2.1
(c)	<p>Procedure for preparation. The D&M Plan shall be prepared by the certificate holder or the owner or operator of the proposed facility or modification to an existing facility. The preparer may consult with the staff of the Council to prepare the D&M Plan.</p>	---
(d)	<p>Timing of plan. The D&M Plan shall be submitted to the Council in one or more sections, and the Council shall approve, modify, or disapprove each section of the plan not later than 60 days after receipt of it. If the Council does not act to approve, modify or disapprove the plan or a section thereof within 60 days after receipt of it, the plan shall be deemed approved. Except as otherwise authorized by the Council, no clearing or construction shall begin prior to approval of applicable sections of the D&M Plan by the Council</p>	Section 4.0
Sec. 16-50j-61. Elements of a D&M Plan		
(a)	<p>Key map. The D&M Plan shall include a key map for the site, including the entire electric transmission line or fuel transmission line, as applicable, that is a reproduction at scale of 1 inch = 2,000 feet of the most recent USGS topographic maps for its location and route.</p>	<p>Figure 1 Key Map, 09/2016 (1 page)</p>
(b)	<p>Plan drawings. The D&M Plan shall consist of maps at a scale of 1 inch = 100 feet or larger (called "plan drawings") and supporting documents, which shall contain the following information:</p>	<p>Appendix B Property/Topographic Survey, April 16, 2015 (3 sheets)</p>
	<p>(1) The edges of the proposed site and of any existing site contiguous to or crossing it, the portions of those sites owned by the company in fee and the identity of the property owners of record of the portions of those sites not owned by the company in fee;</p>	
	<p>(2) Public roads and public lands crossing or adjoining the site;</p> <p>(3) The approximate location along the site of each 50-foot contour line shown on the key map;</p>	

	<p>(4) The probable location, type, and height of the proposed facility, energy components and associated equipment supporting the facility operation, including, but not limited to, each new transmission structure, position of guys, generalized description of foundations, trench grading plans, depth and width of trenches, trench back-filling plans, and the location of any utility or other structures to remain on the site or to be removed;</p>	<p>Appendix B</p> <p>C-300 Overall Site Plan – General Arrangement, August 5, 2016 (1 sheet)</p> <p>C-301 Enlarged Site Plan, April 22, 2015 (1 sheet)</p> <p>C-303 Grading GA, April 22, 2015 (1 sheet)</p> <p>C-501 Fencing Details, April 22, 2015 (1 sheet)</p> <p>S-100, Structural Notes, April 6, 2015 (1 sheet)</p> <p>E-112 Switchyard General Arrangement, May 22, 2015, (1 sheet)</p>
	<p>(5) The probable points of access to the site, and the route and likely nature of the access ways, including alternatives or options to the probable points of access and access ways;</p>	<p>Appendix B</p>
	<p>(6) The edges of existing and proposed clearing areas, the type of proposed clearing along each part of the site, and the location and species identification of vegetation that would remain for aesthetic and wildlife value;</p>	<p>General Arrangement and Clearing Plan, July 29, 2016 (1 sheet)</p> <p>Drawing LR-1, December 22, 2015 (1 sheet)</p> <p>Drawing CL, August 16, 2016 (1 sheet)</p> <p>Drawings LA-1 to LA-3, June 10, 2015 (3 sheets)</p>
	<p>(7) Sensitive areas and conditions within and adjoining the site, including, but not limited to:</p> <p>(A) Wetland and watercourse areas regulated under Chapter 40 of the Connecticut General Statutes, and any locations where construction may create drainage problems;</p>	<p>Section 3.1</p> <p>Section 3.7</p> <p>Appendix D</p> <p>Appendix G</p>
	<p>(B) Areas of high erosion potential;</p>	<p>Appendix B</p> <p>Drawing SE, June 10, 2015 (1 sheet)</p>

	(C) Any known critical habitats or areas identified as having rare, endangered, threatened or special concern plant or animal species listed by federal and state governmental agencies;	Section 3.1 Appendix G
	(D) The location of any known underground utilities or resources including, but not limited to, electric lines, fuel lines, drainage systems and natural or artificial, public or private water resources, to be crossed;	Section 3.1 Appendix B Drawing EX 1, July 14, 2015 (1 sheet)
	(E) Residences or businesses within or adjoining the site that may be disrupted during the construction process; and	Appendix B Property Abutters Map, June 10, 2015 (1 sheet)
	(F) Significant environmental, historic and ecological features, including, but not limited to, significantly large or old trees, buildings, monuments, stone walls or features of local interest.	Section 2.2 Appendix C Appendix G
(c)	Supplemental information. (1) Plans, if any, to salvage marketable timber, restore habitat and to maintain snag trees within or adjoining the site;	Section 3.7
	(2) All construction and rehabilitation procedures with reasonable mitigation measures that shall be taken to protect the areas and conditions identified in section 16-50j-61(b)(7) of the Regulations of Connecticut State Agencies, including, but not limited to:	See below
	(A) Construction techniques at wetland and watercourse crossings;	Not applicable Section 3.1
	(B) Sedimentation and erosion control and rehabilitation procedures, consistent with the Connecticut Guidelines for Soil Erosion and Sediment Control, as updated and amended, for areas of high erosion potential;	Section 3.6 Appendix B Drawing SE, June 10, 2015 (1 sheet) Drawings SD-1 to SD-3, June 10, 2015 (3 sheets)
	(C) Precautions and all reasonable mitigation measures to be taken in areas within or adjoining the site to minimize any adverse impacts of such actions or modifications on endangered, threatened or special concern plant or animal species listed by federal and state governmental agencies and critical habitats that are in compliance with federal and state recommended standards and guidelines, as amended;	Section 5.5 Section 5.6 Appendix G

	(D) Plans for modification and rehabilitation of surface, drainage, and other hydrologic features;	Appendix B Drawing C-303, April 22, 2015 (1 sheet)
	(E) Plans for watercourse bank restoration in accordance with the provisions of Chapter 440 of the Connecticut General Statutes; and	Not Applicable
	(F) Plans for the protection of historical and archaeological resources with review and comment from a state historic preservation officer of the Department of Economic and Community Development, or its successor agency.	Section 2.2 Appendix C
	(3) Plans for the method and type of vegetative clearing and maintenance to be used within or adjacent to the site;	Section 3.7 Appendix B Drawing CL, August 16, 2016 (1 sheet)
	(4) The location of public recreation areas or activities known to exist or being proposed in or adjacent to the site, together with copies of any agreements between the company and public agencies authorizing public recreation use of the site to the extent of the company's property rights thereto;	Not Applicable
	(5) Plans for the ultimate disposal of excess excavated material, stump removal, and periodic maintenance of the site;	Section 3.4
	(6) Locations of areas where blasting is anticipated;	Section 3.5
	(7) Rehabilitation plans, including, but not limited to, reseeding and topsoil restoration;	Section 3.6
	(8) Contact information for the personnel of the contractor assigned to the project; and	Section 3.2 Appendix E
	9) Such site-specific information as the Council may require.	Section 4.0
(d)	Notice. A copy, or notice of the filing, of the D&M Plan, or a copy, or notice of the filing of any changes to the D&M Plan, or any section thereof, shall be provided to the service list and the property owner of record, if applicable, at the same time the plan, or any section thereof, or at the same time any changes to the D&M Plan, or any section thereof, is submitted to the Council.	Section 4.4 Section 4.7
(e)	Changes to plan. The Council may order changes to a D&M Plan, including, but not limited to, vegetative screening, paint color, or fence design at any time during or after preparation of the plan.	Section 4.4

Sec. 16-50j-62. Reporting requirements		
(a)	<p>Site Testing and Staging areas.</p> <p>The certificate holder, or facility owner or operator, shall provide the Council with written notice of the location and size of all areas to be accessed or used for site testing or staging areas. If such an area is to be used prior to approval of the D&M Plan, the Council may approve such use on terms as it deems appropriate.</p>	Section 4.1
(b)	<p>Notice</p> <p>(1) The certificate holder, or facility owner or operator, shall provide the Council, in writing, with a minimum of two weeks advance notice of the beginning of:</p> <ul style="list-style-type: none"> (A) clearing and access work in each successive portion of the site and (B) facility construction in that same portion. 	Section 4.2
	<p>(2) The certificate holder, or facility owner or operator, shall provide the Council with advance written notice whenever a significant change of the approved D&M Plan is necessary. If advance written notice is impractical, verbal notice shall be provided to the Council immediately and shall be followed by written notice not later than 48 hours after the verbal notice. Significant changes to the approved D&M plan shall include, but are not limited to, the following:</p> <ul style="list-style-type: none"> (A) the location of a wetland or watercourse crossing; (B) the location of an access way or a structure in a regulated wetland or watercourse area; (C) the construction or placement of any temporary structures or equipment; (D) a change in structure type or location including, but not limited to, towers, guy wires, associated equipment or other facility structures; and (E) utilization of additional mitigation measures, or elimination of mitigation measures. <p>The Council, or its designee, shall promptly review the changes and shall approve, modify, or disapprove the changes in accordance with subsection (d) of section 16-50j-60 of the Regulations of Connecticut State Agencies.</p>	Section 4.2 Section 4.4
	<p>(3) The certificate holder, or facility owner or operator, shall provide the Council with a monthly construction progress report, or a construction progress report at time intervals determined by the Council or its designee, indicating changes and deviations from the approved D&M Plan. The Council may approve changes and deviations, request corrections or require mitigation measures.</p>	Section 4.8
	<p>(4) The certificate holder, or facility owner or operator, shall provide the Council with written notice of completion of construction and site rehabilitation.</p>	Section 4.9
(c)	<p>Final report.</p> <p>The certificate holder, or facility owner or operator, shall provide the Council with a final report for the facility not later than 180 days after completion of all site construction and site rehabilitation This final report shall identify:</p> <ul style="list-style-type: none"> (1) all agreements with abutters or other property owners regarding special maintenance precautions; 	Section 4.9

	(2) significant changes of the D&M Plan that were required because of the property rights of underlying and adjoining owners or for other reasons;	
	(3) the location of construction materials which have been left in place including, but not limited to, culverts, erosion control structures along watercourses and steep slopes, and corduroy roads in regulated wetlands;	
	(4) the location of areas where special planting and reseeding have been done; and	
	(5) the actual construction cost of the facility, including, but not limited to, the following costs: (A) clearing and access; (B) construction of the facility and associated equipment; (C) rehabilitation; and (D) property acquisition for the site or access to the site.	
(d)	Protective Order. The certificate holder, or facility owner or operator, may file a motion for a protective order pertaining to commercial or financial information related to the site or access to the site.	--
Connecticut Siting Council Decision and Order January 7, 2016		
(1)	The petitioner shall prepare a development and Management (D&M) Plan for the project in compliance with sections 16-50j-60 through 16-50j-62 of the Regulations of Connecticut State Agencies. The D&M Plan shall be served on the Town of Beacon Falls for comment, and all parties and intervenors as listed in the service list, and submitted to and approved by the Council prior to the commencement of facility construction and shall include:	Appendix B C-300 Overall Site Plan – General Arrangement, August 5, 2016 (1 sheet)
	a) a final plan(s) of site development to include specifications for the fuel cell facility including infrastructure, electrical equipment, equipment compound, access and maintenance roads, utility connections, sound mitigation, stormwater control, wastewater infiltration basins, facility fencing with less than two inch mesh, and landscaping;	C-301 Enlarged Site Plan, April 22, 2015 (1 sheet) C-303 Grading GA, April 22, 2015 (1 sheet) C-501 Fencing Details, April 22, 2015 (1 sheet) S-100, Structural Notes, April 6, 2015 (1 sheet) E-112 Switchyard General Arrangement, May 22, 2015, (1 sheet)
	b) construction plans for site clearing, grading, sound mitigation, landscaping, water drainage, stormwater control, and erosion and sedimentation controls consistent with the 2002 Connecticut Guidelines for Soil Erosion and Sediment Control, as amended;	Section 3.6
	c) Reduction in the amount of paved surfaces within the fuel cell compound, if feasible;	Section 5.1

	d) Provisions for improving safety at the access drive entrance on Lopus Road	Section 5.2 Appendix B
	e) An analysis of the proper placement of the sound mitigation barrier to reduce noise from the fuel cell facility and to reduce the potential for highway sound reflection to the Gruber Road neighborhood;	Section 5.3
	f) Provisions for the excavation and characterization of soils within the former disposal area on the property, as identified in the Phase 1 Environmental Site Assessment report dated August 5, 2015;	Section 5.4 Appendix B Disposal Area Exploration Plan, September 7, 2016 (1 sheet)
	g) Provisions for a Eastern Hognose Snake Protection Program that includes Department of Energy and Environmental Protection recommended construction practices;	Section 5.5
	h) Submission of correspondence from the Department of Energy and Environmental Protection, if applicable, regarding final comment on the Field Habitat Assessment Report dated August 5, 2015;	Section 5.6
	i) Construction work hours;	Section 5.7
	j) Submission of relevant portions of the Title V and New Source Review air permit applications that include a detailed analysis of alternative technologies, operational methods and/or fuels that can be employed at the facility to reduce greenhouse gas emissions to the greatest practical extent; and	Section 5.8
	k) A facility and associated infrastructure decommissioning plan.	Section 5.9

1.0 INTRODUCTION

Beacon Falls Energy Park, LLC (BFEP) has prepared this Development and Management (D&M) plan in support of construction of a nominal 63.3 megawatt (MW) fuel cell energy facility pursuant to the requirements of section 16-50j-60 of the Regulations of Connecticut State Agencies (RCSA).

1.1 Project Description

BFEP has proposed to construct the Beacon Falls Energy Park, a nominal 63.3 MW baseload fuel cell project in the Town of Beacon Falls, Connecticut. The site is located in an Industrial Park District (“IPD”) of Beacon Falls and conforms to lot size and dimensional requirements, as well as to all setbacks, height and coverage requirements. The site is located in close proximity to the growth areas along Route 8 in Beacon Falls and is compatible with existing industrial land uses in the area and consistent with the Plan of Conservation and Development for Beacon Falls and the Conservation and Development Policies Plan for Connecticut.

The Project will occupy approximately 8 acres of an approximately 25 acre site currently owned by O&G Industries, Inc. and located between Connecticut Route 8 and the Naugatuck River (see Figure 1). More specifically, the Property is located adjacent to the western side of the Metro-North Rail line and along the southern side of Lopus Road. The site, a former sand and gravel mining area, consists of predominantly flat terrain, with significant sloping topography along its western and northern boundaries formed by the sand and gravel operations. The topography of the Property will give the Project a low visibility and profile. The Project site is located in a natural “bowl” approximately 50 feet below Gruber Road. Trees and vegetation will provide visual and sound buffers.

The Project consists of the following:

- 5 FuelCell Energy, Inc. high efficiency fuel cell (HEFC) fuel cell plants, each rated at approximately 3.7 MW
- 15 FuelCell Energy, Inc. DFC3000 fuel cell plants, each rated at approximately 2.8 MW
- 1 ORMAT Energy Converter System, rated at approximately 4.6 MW, and consisting of Organic Rankine Cycle (ORC) preheater and vaporizer heat recovery units, a vapor turbine, a generator, and a condenser.
- Switchyard facilities.
- A metering facility

Each of the 20 fuel cell plants will contain two (DFC3000) or three (HEFC) fuel cell modules, each consisting of four “stacks” of fuel cells, and will be equipped with an air heater with a maximum heat input of 11.2 million British thermal units per hour (MMBtu/hr). The air heater will only operate when the fuel cells are idle, or when a fuel cell module is not operating at a

sufficient power level to maintain its required minimum temperature. Note that all MMBtu values are expressed as the higher heating value (HHV), unless otherwise indicated. For natural gas, the lower heating value (LHV) is 90% of the HHV. It is expected that the fuel cells will operate continuously. The Project will use natural gas exclusively as fuel.

Fuel cells require natural gas and treated water to generate electricity. Access to natural gas and water, is accordingly, critical to a fuel cell project. The Project site is located in close proximity to both natural gas and water pipeline infrastructure. The interconnection to the grid is located on Cold Springs Road, in Beacon Falls.

1.2 Plan Organization

The preface of this report provides a reference table that lists the regulatory requirements and the requirements of the Connecticut Siting Council's (CSC) Decision and Order approving this project. The preface contains a table with a cross reference to the section of the plan where a particular requirement is discussed.

Section 1.0 presents an overall project description along with this summary of the report structure. Section 2.0 lists regulatory approvals, requirements, and consultations. Where specific consultations (e.g., NDDB, wetlands, etc.) are relevant to later sections of the document, they are described in the most relevant portion of this D&M Plan. Section 3.0 describes the development/construction of the project and Section 4.0 describes the notices and reports to be prepared in support of the project. Section 5.0 describes actions to be taken to address specific CSC Decision and Order requirements and Section 6.0 provides a project schedule.

2.0 REGULATORY APPROVALS AND CONSULTATIONS

2.1 Regulatory Approvals and Requirements

This D&M Plan has been prepared in compliance with the requirements specified at RCSA Sections 16-50j-60 through 16-50j-62 (Requirements for a D&M Plan, Elements of a D&M Plan, Reporting Requirements). In addition this D&M Plan also address the specific conditions; and (ii) reflects adherence to the conditions (1a to 1k) of the CSC’s Decision and Order of January 7, 2016. A copy of the January 7, 2016 CSC Decision and Order is provided as Appendix A.

2.2 Consultations

The Project has received regulatory approvals or clearances from State and Federal agencies including:

- Connecticut Department of Energy and Environmental Protection (“CTDEEP”)
- CTDEEP Natural Diversity Database (“NDDB”)
- State Historic Preservation Office (“SHPO”)
- Connecticut State Archeologist
- Mashantucket Pequot – Tribal Historic Preservation Officer
- The Mohegan Tribe – Tribal Historic Preservation Officer

BFEP has consulted with municipal officials in the Town of Beacon Falls throughout the project development process, including during the preparation of this D&M Plan. BFEP is in the process of coordinating with the Connecticut Department of Transportation (DOT), Metro North Rail Road, and AT&T for project construction activities that may impact their specific interests at the project site. Project construction in locations requiring specific permits will not start until these permit approvals are received. BFEP will comply with the requirements and conditions in the siting and permitting approvals summarized below. BFEP will report to the CSC as required and as discussed in Section 4.0 below

Category	Permit	Permit Trigger	Review Agency	Comments
Air	Permit to Construct and Operate	Prior to Commencing Construction	CTDEEP Air Management	Filed January 27, 2016. Expected October 2016
Building	Building Permit	Construction of Fuel Cell Units	Beacon Falls Building Department	Target Date November 2016

DOT/Metro North RR	Temporary Right of Entry	Any activity proposed within Metro North Railroad operated facilities/CT DOT ROW	Metro North/DOT	Request sent 12JUN2015. Stamped drawings sent 10NOV2015. Insurance and Force Acct. to be established prior to MNR review.
Category	Permit	Permit Trigger	Review Agency	Comments
DOT/Metro North RR	License Agreement	Permanent utilities located within RR ROW	DOT	Needed for Water Supply Connection
FERC – Interconnect Agreement	Electric Generator Wholesale Status	Generation of Electricity for Distribution	FERC	Expected December 2016
Local	Inland Wetlands and Watercourses	Information only - no local permit (see Site Approval)	Beacon Falls Inland Wetlands and Watercourse Commission	
	Planning and Zoning	Information only - no local permit (see Site Approval)	Beacon Falls Planning and Zoning Commission	
Site Approval	Declaratory Ruling and Petition	Generation of Electricity for Distribution	Connecticut Siting Council (CSC)	Approved January 07, 2016
Stormwater	General Permit for Stormwater Construction Activities	Site disturbance of greater than five acres	CTDEEP	Filed August 30, 2016
	General Permit for Stormwater Associated with Industrial Activities	Permit not required based on SIC code	CTDEEP	
Wastewater	General Permit for Water Treatment Wastewater	Discharge of wastewater into groundwater via infiltration basins	CTDEEP	Target date for submittal - June 2017
Hazardous Waste	RCRA Subtitle C Site Identification Form	Generation of Hazardous Waste (Desulfurization)	CTDEEP	Operational Permit

In response to a May 12, 2015 request for comments on the presence of historic properties to SHPO, the following response was provided by letter dated June 18, 2015.

“There are no archaeological sites or properties listed on the National Registers of Historic Places recorded within or in the immediate vicinity of the project area. The project parcel is comprised primarily of Udorthents-Pit complex soils. During the past 40 years, the site was mined for sand and gravel. Although this office considers the area

to be archeologically sensitive, the proposed project facility is within existing disturbed footprints,. Based on the informationb provided to our office, it is SHPO's opinion that no historic properties will be affected by this undertaking as described."

A copy of the SHPO letter is provided in Appendix C.

3.0 CONSTRUCTION INFORMATION

3.1 Project Facilities and Land Requirements

The Project site will take up approximately 8 acres of the 25.02 acre Property. The topography of the Property will give the Project a low visibility and profile. The Project site is located in a natural “bowl” approximately 50 feet below Gruber Road. Trees and vegetation will provide visual and sound buffers. Because the geology of the site is one of deep sand and gravel, there will be no net change in the discharge of storm water from the site from existing conditions.

Fuel cells require natural gas and treated water to generate electricity. Access to natural gas and water, is accordingly, critical to a fuel cell project. The Project site is located in close proximity to critical infrastructure such as natural gas and water pipelines. The interconnection to the grid is located on Cold Springs Road, in Beacon Falls.

Consistent with the July 23, 2015 Inland Wetland and Watercourse Impact Assessment, wetlands on the project site were delineated on April 20, 2015. No wetland crossings are proposed for the project. A copy of the July 23, 2015 Inland Wetland and Watercourse Impact Assessment report is provided as Appendix D.

The only known utility present on the project site is an AT&T fiber line which is located at the northern tip of the site. The location and orientation of the line is shown on the Proposed Driveway Plan (Drawing EX-1) provided with the drawings in Appendix B.

Detailed design associated with items such as piping, wiring, instrumentation, underground utilities, etc., will not be completed until a notice-to-proceed (NTP) for construction has been issued, as is customary with projects of this type and scope.

3.2 Construction Management and Contact Information

Contact information for the contractor personnel assigned to the project is provided as Appendix E.

3.3 Construction Work Hours

Construction work hours shall be Monday through Friday from 7 AM to 5 PM. During Start-Up and Commissioning, there may be minor activities on nights and weekends until Start-Up is complete.

3.4 Site Preparation

Ground surfaces within the construction areas will be cleared of all vegetation prior to construction. Residual material in the form of stumpage may be generated and will be removed

for proper off-site disposal. By design, the site development and grading will balance cut and fill areas such that excess materials are not anticipated to be imported or removed from the project site. Periodic maintenance will include the periodic removal of accumulated sediment from the stormwater and process water infiltration ponds.

3.5 Blasting Procedures

No blasting will be performed as part of the project.

3.6 Erosion and Sediment Controls

A Sediment and Erosion (S&E) Control Plan has been developed to mitigate the short-term impacts of the project during construction. The S&E Control Plan includes descriptive specifications concerning land grading, topsoiling, temporary vegetative cover, permanent vegetative cover, and vegetative cover selection and mulching, and erosion checks. Details have been provided for all erosion control measures with corresponding labels on the S&E control site plan. The S&E controls provided are in accordance with the Connecticut Department of Environmental Protection's *2002 Connecticut Guidelines for Soil Erosion and Sediment Control*.

The construction areas will be surrounded by a geotextile sediment filter fence that will be fortified with staked hay bales upgradient of the wetland areas. A stone construction entrance has been provided at the site entrance from Lopus Road. Erosion control blankets will be proposed on critical slopes to protect the newly created slopes until permanent vegetation can be established. During construction, inlet protection will be provided at the proposed drainage inlet structures to trap sediment. Temporary diversion berms and swales will be provided to direct the stormwater runoff from the site to the temporary sediment traps. The swales will include stone check dams to slow potential erosive velocities. The S&E controls are to be modified with the changing grades on site to ensure the protection of the surrounding areas throughout the construction process.

Information on the temporary and permanent vegetative cover is provided on the drawings provided in Appendix B. BFEP shall establish temporary vegetative cover on all unprotected area that produce sediment, areas where final grading has been completed and areas where the estimated period of bare soil exposure is less than 12 months. Vegetative cover will be established in areas that will not be permanently seeded by September 1st. Permanent vegetative cover will be established as various sections of the project are completed in order to stabilize these areas, reduce impacts from sediment and runoff and to enhance the aesthetic nature of the site.

Point source discharges of construction stormwater are not anticipated due to the high permeability of the existing sand and gravel materials at the project site. Therefore, the design goal of the stormwater management plan is to take advantage of the sandy soils present on site and naturally infiltrate stormwater runoff as occurs under existing conditions using four proposed detention/infiltration basins. These basins are designated as Stormwater Basins TST #1 through #4 on the Sedimentation and Erosion Control Plan in Appendix B

BFEP completed a Registration on August 30, 2016 under the CTDEEP Stormwater Construction General Permit to manage any impacts of stormwater runoff that may discharge to waters of the state of Connecticut.

3.7 Clearing and Landscaping

A brief summary of the upland vegetated area of the property where the fuel cells will be placed is provided below followed by a brief description of the development of the project on the site.

As described from the July 30, 2015 Environmental Assessment Report, the site has varying vegetation community zones including mixed hardwood forest, railroad right of way vegetation zone, xeric scrub shrub zone, and xeric herbaceous zone. The area identified as the open pond/water zone is outside the limits of the project development.

The hardwood forest zone consists of a mix of hardwood trees and shrubs. These forested areas appear to be at least 50 to 60 years of age based on the tree sizes observed within these areas. Typical vegetation consisted of white oak, red oak (*Quercus rubra*), black oak (*Quercus velutina*), sugar maple (*Acer saccharum*), Eastern hophornbeam (*Ostrya virginiana*), shagbark hickory (*Carya ovata*), American beech (*Fagus grandifolia*), black cherry (*Prunus serotina*), lowbush blueberry (*Vaccinium angustifolium*), witchhazel (*Hamamelis virginiana*), winged euonymus (*Euonymus alatus*), Japanese barberry (*Berberis thunbergii*); and various sedges, grasses, and mosses.

The railroad vegetation zone is located along the eastern portion of the property and consists of a narrow swath ranging between 20 to 30 feet in width. Here the plants consist of eastern red cedar, red oak, black oak, big toothed aspen, quaking aspen, autumn olive, multiflora rose, and wormwood.

The xeric scrub shrub zone is the largest vegetation community on site. This vegetation zone consists of shrubby vegetation that ranges in height from 6 to 12 feet. Some herbaceous vegetation is capable of surviving in areas where sunlight can penetrate to the ground. The dominant vegetation in this community included grey birch, black cherry, quaking aspen, sassafras, eastern red cedar, autumn olive, and multiflora rose.

The xeric meadow zone is found along the central portion of the site and is dominated by open barren sandy areas and densely vegetated herbaceous zones. Some shrubs are intermixed amongst the herbaceous vegetation, but are in limited density and height. Plants observed within this zone included sweetfern, little blue stem, wormwood, evening primrose, common mullen, round headed bush clover, and a variety of other grasses.

The limits of the project and the project clearing limits are shown on the General Arrangement and Clearing Plan provided in Appendix B. Development of the energy park on this parcel is not likely to significantly impact the natural resources as efforts will be employed to control influence of nearby water resources and to reduce the overall amount of disturbance of the site during construction. Direct impacts to vegetation and wildlife are expected to be minimal given past activities and the open nature of the site. A majority of the existing scrub shrub habitats found around the periphery of the site will remain for use by the brown thrasher, a species of special concern in Connecticut. Additional shrub and tree plantings are proposed along the southern and eastern limits of the site. The project will implement several important protection plans and management measures to help protect state-listed special concern species.

To address the elements of a D&M Plan as found in RCSA section 16-50j-61(c)(1), BFEP has no plans to salvage marketable timber as no such timber is present at the project site. The only relatively large trees being removed are at the site access road where it intersects Lopus Road. The bulk of the area being developed is either exposed sand from dirt bike tracks, grass, small pine or cedars, or invasive autumn olives.

4.0 NOTICES AND REPORTS

BFEP shall provide this D&M Plan to the CSC for review and approval. It is anticipated that the CSC will review and/or comment on the Plan prior to its approval. Except as otherwise authorized by CSC, no clearing or construction shall begin prior to approval of applicable sections of the D&M Plan by the CSC.

4.1 Staging and Material Laydown Areas

BFEP will provide the CSC with written notice of the location and size of all areas to be accessed or used for site testing or staging areas. If such an area is to be used prior to approval of the D&M Plan, the CSC may approve such use on terms as it deems appropriate.

4.2 Notices to the Council

The following summary of notices to the CSCS have been extracted from RCSA 16-50j-62 as well as the CSC's January 7, 2016 Decision and Order. The notices have been listed in sequential order from those anticipated to be issued first to last.

- a) Within 45 days after completion of all construction, the CSC shall be notified in writing that construction has been completed.
- b) Any request for extension of the time period referred to in Condition 3 of the January 7, 2016 Decision and Order shall be filed with the CSC not later than 60 days prior to the expiration date of said time period and shall be served on all parties and intervenors, as listed in the service list, and the Town of Beacon Falls. Any such request for extension shall state the reason(s) for which an extension is being sought.
- c) Consistent with the requirements of RCSA Section 16-50j-62 the certificate holder, or facility owner or operator, shall provide the CSC with a final report for the facility not later than 180 days after completion of all site construction and site rehabilitation.
- d) The Petitioner, or its successor, shall provide the CSC with not less than 30 days written notice when the facility will cease operations.
- e) 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 CSC 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.
- f) In addition to the above notices BFEP shall provide site-specific information as the CSC may require.

4.3 Notice of Beginning

BFEP will provide the CSC, a minimum of two weeks advance written notice of the beginning of;

- a. Clearing and access work in each successive portion of the site, and
- b. Facility construction in that same portion.

4.4 Notices of Changes

BFEP will provide the CSC with advance written notice whenever a significant change of the approved D&M Plan is necessary. If advance written notice is impractical, verbal notice shall be provided to the Council immediately and shall be followed by written notice not later than 48 hours after the verbal notice. Significant changes to the approved D&M Plan shall include, but are not limited to, the following:

- a. The location of a wetland or watercourse crossing;
- b. The location of an access way or a structure in a regulated wetland or watercourse area;
- c. The construction or placement of any temporary structures or equipment;
- d. A change in structure type or location including, but not limited to, towers, guy wires, associated equipment or other facility structures; and
- e. Utilization of additional mitigation measures, or elimination of mitigation measures.

In addition to the above changes, BFEP will amend this D&M Plan to address CSC-ordered changes including, but not limited to, vegetative screening, paint color, or fence design at any time during or after preparation of the plan.

4.5 Notice of Completion

The certificate holder, or facility owner or operator, shall provide the CSC with written notice of completion of construction and site rehabilitation. In addition, a final report shall be prepared as indicated in Section 4.9 below and provided to the CSC not later than 180 days after completion of all site construction and site rehabilitation.

4.6 Notice to Municipalities

Any request for extension of the time period referred to in Condition 3 of the January 7, 2016 Decision and Order shall be filed with the CSC not later than 60 days prior to the expiration date of said time period and shall be served on all parties and intervenors, as listed in the service list, and the Town of Beacon Falls. Any such request for extension shall state the reason(s) for which an extension is being sought.

4.7 Notice to Landowners

A copy, or notice of the filing, of the D&M Plan, or a copy, or notice of the filing of any changes to the D&M Plan, or any section thereof, shall be provided to the service list and the property owner of record, if applicable, at the same time the plan, or any section thereof, or at the same time any changes to the D&M Plan, or any section thereof, is submitted to the CSC.

4.8 Monthly Reports

BFEP will provide the CSC with a quarterly construction progress report, or a construction progress report of a different time interval determined by the CSC, indicating changes and deviations from the approved D&M Plan.

4.9 Final Report

Consistent with the requirements of RCSA section 16-50j-62 the certificate holder, or facility owner or operator, shall provide the CSC with a final report for the facility not later than 180 days after completion of all site construction and site rehabilitation. This final report shall identify:

- 1) All agreements with abutters or other property owners regarding special maintenance precautions;
- 2) Significant changes of the D&M Plan that were required because of the property rights of underlying and adjoining owners or for other reasons;
- 3) The location of construction materials which have been left in place including, but not limited to, culverts, erosion control structures along watercourses and steep slopes, and corduroy roads in regulated wetlands;
- 4) The location of areas where special planting and reseeding have been done; and
- 5) The actual construction cost of the facility, including, but not limited to, the following costs:
 - a. Clearing and access;
 - b. Construction of the facility and associated equipment;
 - c. Rehabilitation; and
 - d. Property acquisition for the site or access to the site.

5.0 ADDITIONAL ELEMENTS PER COUNCIL ORDER

5.1 Reduction in Paved Surfaces

Condition 1(c) of the CSC Decision and Order of January 7, 2016 requires the following:

“Reduction in the amount of paved surfaces within the fuel cell compound, if feasible;”

The project includes pavement for access roadways and in areas around fuel cells. Pavement is necessary for a perimeter roadway for fire truck and emergency equipment access to the facility. Additionally, pavement is required to support the periodic use of heavy equipment as part of routine maintenance procedures including periodic fuel cell restacking. As such, the project requires most surfaces inside the fence to be paved. However, reduction in the amount of paved surfaces may be accomplished during final design in select portions of the project such as on the backside of the water storage tank. Reduction in paved surfaces will be evaluated during the detailed design phase of the project.

5.2 Access Drive on Lopus Road

Condition 1(d) of the CSC Decision and Order of January 7, 2016 requires the following:

“Provisions for improving safety at the access drive entrance on Lopus Road”

The site will be accessed by a proposed driveway to be located at Lopus Road as indicated on Drawing LR-1 (December 22, 2015) provided in Appendix B. A traffic evaluation was conducted in late 2015 where motorist visibility was reviewed upon egress from the site. With some regrading of the land on the northwest side of Lopus Road opposite the site, the Intersectional Sight Distances (ISDs) looking left and right for motorists exiting the site will be 280 feet and 300 feet respectively. These distances meet Connecticut Department of Transportation (ConnDOT) guidelines for non-heavy trucks and the posted speed limit. This approach will maximize the ISD's given the grading of the site and the curvature of Lopus Road, both of which limit the driveway access. It is noted that motorists on Lopus Road approaching from the north will be approaching on an uphill segment and motorists approaching from the west will be approaching from a stop-sign controlled approach at the intersection of Gruber Road. Stopping sight distances for vehicles travelling on Lopus Road in this area will be available based on the guidelines for speeds greater than the posted speed limit. As indicated in the drawing provided in Appendix B, new advisory signage is proposed: chevron curvature warning signs, downhill grade warning and a “Trucks Entering From Right – 300 Feet” ahead warning sign. Additionally, a new metal beam guiderail is proposed along the Lopus Road curve.

Construction of the energy plant is anticipated to take place for approximately three years. During this time construction related traffic can be readily accommodated on the surrounding roadways. Following construction of the energy plant, there will be very few employee trips to operate and maintain the facility on a day-to-day basis.

5.3 Sound Mitigation Barrier

Condition 1(e) of the CSC Decision and Order of January 7, 2016 requires the following:

“An analysis of the proper placement of the sound mitigation barrier to reduce noise from the fuel cell facility and to reduce the potential for highway sound reflection to the Gruber Road neighborhood;”

TRC Environmental Corporation (“TRC”) conducted a technical noise assessment of the BFEP Project. The noise assessment consisted of two parts: an ambient noise monitoring program in the vicinity of the Project in order to characterize the existing noise environment; and a detailed noise modeling study/impact evaluation of the proposed Project. As shown on the MMI and PCI general arrangement drawings, the precise location of the timber sound wall is dictated by the location of existing trees. Drawing MDS-21, Miscellaneous Details, provides information on the construction of the sound barrier. While the precise orientation and height of the sound wall will be determined during final design, TRC evaluated the barrier as a reflective surface (as if it were sheet steel). The barrier reflection would increase Route 8 traffic noise levels along Gruber Road by less than one decibel, which is insignificant/imperceptible. A copy of the most recent (January 2016) Noise Assessment Report is provided as Appendix F.

5.4 Excavation and Characterization of Soils in Former Disposal Area

Condition 1(f) of the CSC Decision and Order of January 7, 2016 requires the following:

“Provisions for the excavation and characterization of soils within the former disposal area on the property, as identified in the Phase I Environmental Site Assessment report dated August 5, 2015;”

The August 5, 2015 Phase I Environmental Site Assessment (ESA) completed by Catalyst Environmental Consulting of Simsbury Connecticut indicated the presence of an on-site disposal area. Two photographs (#6 and #7) provided in the August 5, 2015 Phase I ESA shown a discarded flattened drum and scrap metal and location of a depression in the northeastern corner of the property. This area is described as follows:

Section 2.1 Site Description

“A shallow depression was noted at the site's northeastern most portion; it appears to straddle the northeast property line. The northern side of the depression appeared to have a stone foundation-like wall approximately 3 ft. high (Photograph 6). An empty, rusted drum and scrap metal were observed protruding from the ground in the vicinity of the depression (Photograph 7).”

Additional information on this area along with a recommendation for action from the Phase I ESA is provided below.

Section 6.1 On-Site Sources

“*Current Presence of On-site Disposal:* Sand and gravel pits are often used as improper or unauthorized disposal areas; only one such area was observed at the site. The small area straddles the northeast property line, and includes a discarded, empty rusted 55-gallon drum and scrap metal in the vicinity of a small topographical depression at the site's northeastern corner.”

Section 8.0 Conclusions/Recommendations

“Excavation of the disposal area at the northeast corner of the site should be conducted to determine the extent and degree. If visual and/or olfactory evidence of contamination is encountered, soil samples should be collected and analyzed.”

A drawing that illustrates the depression is provided in Appendix B. As noted, this area is approximately 50 feet by 20 to 30 feet in size. The following actions are recommended to assess the nature of the scrap metal observed in this area.

1. Conduct a program of test pitting to determine the extent of metal debris and presence/absence of impacted soil within and at the edges of the depressed area. Test pits shall be completed vertically to determine the depth of scrap metal and/or fill material to a maximum depth limited by test pitting equipment. However, existing information indicates scrap metal disposal may be surficial in nature; if this is observed during test pitting activities the vertical limits of test pitting shall be five to six feet below ground surface. Test pits shall also be completed horizontally to define the limits of any fill/waste materials present in the depressed area. It is anticipated that a one day program of test pitting would be required.
2. A qualified geologist or scientist shall document the soil characteristics on test pit logs at each location. Documentation will include; soil type, visual staining or odor, and presence and nature of non-native fill. In addition soil and/or fill within each test pit shall be screened for the presence of volatile organic compounds (VOCs) using a flame/photo ionization detector.

3. Test pits logs will be completed at each location and one soil sample shall be collected from each test pit location where evidence of contamination (e.g., discoloration, odor, elevated field instrumentation readings) is encountered. Based on the undermined nature of the scrap metal and/or fill within the depressed area a program of analysis for extractable petroleum hydrocarbons (ETPH) and polychlorinated biphenyls (PCBs) shall be completed for each impacted soil sample. Any test pits that indicate elevated PID/FID readings will be subject to additional analysis for VOCs. These additional samples will be collected using EPA 5035 methodologies and analyzed by EPA Method 8260. Analytical results shall be compared to relevant Connecticut Remediation Standard (RSR) criteria with recommendations for excavation and off-site disposal of solid waste/scrap metal and excavation and off-site management of any soil that exceeds relevant RSR criteria.

5.5 Eastern Hognose Snake Protection Program

Condition 1(g) of the CSC Decision and Order of January 7, 2016 requires the following:

“Provisions for a Eastern Hognose Snake Protection Program that includes Department of Energy and Environmental Protection recommended construction practices;”

A December 2014 Natural Diversity Database (NDDDB) review identified the site as having the potential for the listed special concern species, the eastern hognose snake to be present. As part of the Environmental Assessment report, completed on July 30, 2015, a reptile survey was conducted by ecologists in July 2015. In response to the Environmental Assessment, the CSC received a letter from the CTDEEP dated November 4, 2015 regarding the Beacon Falls Energy Park project (Petition No. 1184). One of the comments pertained to NDDDB listed species and asked whether additional field surveys had been conducted on site to determine the habitat and/or presence of several flora and fauna species. Per the CTDEEP comment letter, the following language has been added to the Beacon Falls Snake Management Plan, and is reflected in the summary below.

“Any hognose snake found must be moved or allowed to move to a safe area off the project site. As a protected species, it cannot be killed. Though not poisonous or dangerous, the snake should be handled only by a trained biologist.”

The survey indicated that no eastern hognose snakes were found during multi-day field surveys. In fact, no snakes of any kind were observed on site. Although no eastern hognose snakes were found, the generation site does have habitat that can support the eastern hognose snake. The following management plan has been developed to help protect these species during construction of the energy park. Silt fence will be installed as shown on the plans to form a barrier along the potential habitat. These silt fences will help limit the potential for snakes to enter the project site.

However, if said species are observed within the project area, the contractor is responsible for following the snake management plan as follows:

- Conduct a sweep of the project area by a qualified wildlife biologist prior to installation of silt fence.
- Install silt fencing around the work area prior to the start of any construction.
- Conduct a second sweep of the project area by a qualified wildlife biologist prior to construction.
- The contractor will be informed of the potential presence of eastern hognose snakes within the project site and will be furnished with a description of the snake for proper identification purposes. This will be accomplished by inclusion of the necessary information in the contract documents, including notations on the plans and a Notice to Contractor and/or special provisions as appropriate.
- Carefully remove any eastern hognose snake discovered inside the project area and relocate unharmed to an area immediately outside of the silt fence and in the same direction it was slithering. Any hognose snake found must be moved or allowed to move to a safe area off the project site. As a protected species, it cannot be killed. Though not poisonous or dangerous, the snake should be handled only by a trained biologist
- Restrict machinery and heavy vehicles from being parked or operated in hognose snake habitat. Confine parking for construction equipment within the limits bound by silt fence.
- Work conducted during the early morning and evening hours should occur with special care not to harm basking or foraging individuals.
- Silt fence should be removed once construction is complete and soils have been stabilized to avoid restricting wildlife movement.

In response to the NDDDB Final Determination No.: 201609163, the CTDEEP concurs with the above referenced recommendation regarding the hognose snakes. More specifically an August 8, 2016 letter from CTDEEP (See Appendix G) indicates the following:

“I concur with your recommendation regarding the hognose snake. Thank you for including the protection strategies and best management protocols that will be in place to protect the hognose snake from project impacts. If these protection strategies are followed then the proposed activities will unlikely have an adverse impact on this species. This determination is good for two years. Please re-submit an NDDDB Request for Review if the scope of work changes or if work has not begun on this project by August 4, 2018.”

A copy of the NDDDB request package and Field Habitat Assessment Report and resumes of biologists whom preformed the necessary surveys for this project are provided as Appendix G.

5.6 Field Habitat Assessment Report

Condition 1(h) of the CSC Decision and Order of January 7, 2016 requires the following:

“Submission of correspondence from the Department of Energy and Environmental Protection, if applicable, regarding final comment on the Field Habitat Assessment Report dated August 5, 2015;”

A copy of the August 5, 2015 Field Habitat Assessment Report is provided within the NDDB application request in Appendix G. In response to the NDDB and attached Field Habitat Assessment Report the CTDEEP provided the following comments by letter dated August 4, 2016.

“I have re-reviewed Natural Diversity Data Base maps and files regarding the area delineated on the map you provided for the proposed Construction of a 63.3 MW Fuel Cell Energy Facility at Beacon falls Energy Park on Lopus Road in Beacon Falls, Connecticut. Our NDDB Preliminary Assessment # 201503256 had identified several state-listed species that were known to occur in this area of Beacon Falls. Thank you for including the Field Habitat Assessment Report for the site and resumes of biologists whom preformed the necessary surveys for this project. The field habitat survey targeted Virginia waterleaf, Hooker’s orchid, downy wood mint, brown thrasher and eastern hognose snake. The report indicated that although one brown thrasher was observed on site there was no evidence of nesting and no nest site was discovered. No further mitigation is needed for this species with respect to the project. Although none of the state-listed plants were found on site the report noted that a snake management plan should be implemented during the construction portion of this project. I concur with your recommendation regarding the hognose snake. Thank you for including the protection strategies and best management protocols that will be in place to protect the hognose snake from project impacts. If these protection strategies are followed then the proposed activities will unlikely have an adverse impact on this species. This determination is good for two years. Please re-submit an NDDB Request for Review if the scope of work changes or if work has not begun on this project by August 4, 2018.

Natural Diversity Data Base information includes all information regarding critical biological resources available to us at the time of the request. This information is a compilation of data collected over the years by the Department of Energy and Environmental Protection’s Natural History Survey and cooperating units of DEEP, private conservation groups and the scientific community. This information is not necessarily the result of comprehensive or site-specific field investigations. Consultations with the Data Base should not be substitutes for on-site surveys required for environmental assessments. Current research projects and new contributors continue to

identify additional populations of species and locations of habitats of concern, as well as, enhance existing data. Such new information is incorporated into the Data Base as it becomes available.”

5.7 Construction Work Hours

Condition 1(i) of the CSC Decision and Order of January 7, 2016 requires the following:

“Construction work hours”

As indicated in Section 3.3 above, construction work hours shall be Monday through Friday from 7 AM to 5 PM. During Start-Up and Commissioning there may be minor activities on nights and weekends until Start-Up is complete.

5.8 Air Permitting

Condition 1(j) of the CSC Decision and Order of January 7, 2016 requires the following:

“Submission of relevant portions of the Title V and New Source Review air permit applications that include a detailed analysis of alternative technologies, operational methods and/or fuels that can be employed at the facility to reduce greenhouse gas emissions to the greatest practical extent;”

A New Source Review (NSR) permit application was submitted to CTDEEP on January 27, 2016 following the required public notice in the Waterbury Republican-American newspaper on January 23, 2016. A Title V permit application will be prepared and submitted to CTDEEP in the near future to address greenhouse gas (GHG) emissions.

A portion of the NSR permit application included a Best Available Control Technology (BACT) analysis which was provided as Attachment G to the NSR application and which is provided as Appendix H to this D&M Plan for reference. The following summarizes the identified control technologies and options that were evaluated for the project.

BACT Option	Comments/Rationale
Thermally efficient equipment	Thermal efficiency is inherent to the process
Clean Fuels	The fuel cells will use natural gas, which has the lowest carbon content of any fuel
Good practices	Fuel cells will be operated in accordance with manufacturer’s specifications and best practices.

As of the date of the publication (September 2016), a draft NSR permit (Permit No. 006-0009) is currently under preparation by the CTDEEP. It is anticipated CTDEEP will make an internal

tentative determination in the near future. The 30-day public comment period commences on the date the Department's tentative determination to issue the permit is published by the CTDEEP in a newspaper in general circulation in the Beacon Falls area.

5.9 Infrastructure Decommissioning Plan

Condition 1(k) of the CSC Decision and Order of January 7, 2016 requires the following:

“A facility and associated infrastructure decommissioning plan.”

A facility and infrastructure decommissioning plan is currently under development and, upon completion, will be provided as Appendix I to this document.

6.0 PROJECT SCHEDULE

Major elements of the project schedule are summarized in the table below. A more detailed schedule is provided as Appendix J.

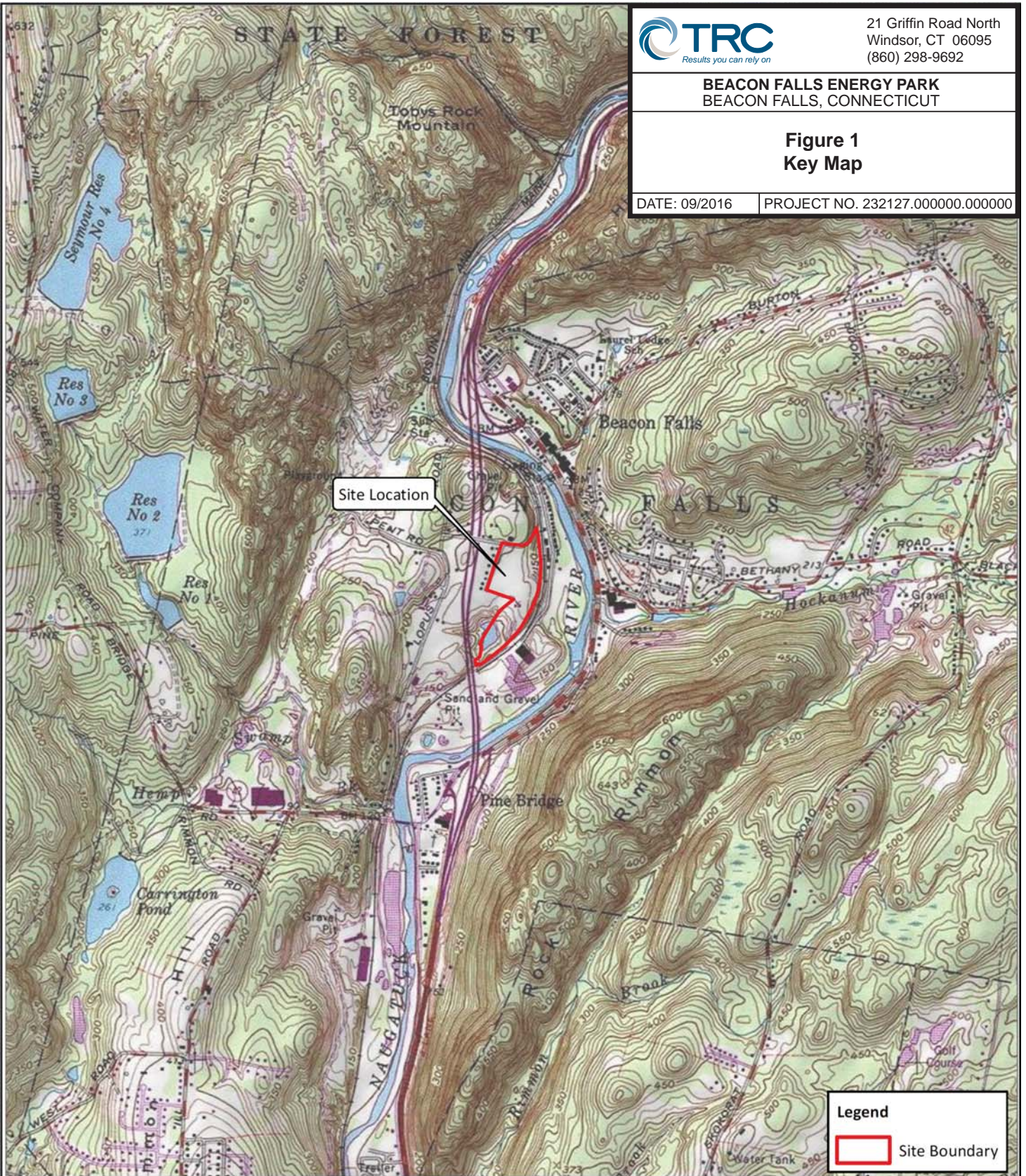
ID	Description	Early Start	Early Finish
200	Start Permitting	February 15, 2015	
054	Detailed Design	November 1, 2016	April 28, 2017
202	Start Construction	November 1, 2016	
210	Electrical Interconnection		March 2, 2018
060 to 063	Fuel Cell Delivery Phase I to Phase IV	December 1, 2017	May 6, 2019
212	Substantial Completion		September 23, 2019
214	Commissioning (FCM Obligation)		April 1, 2020
204	In-Service Date (FCM Obligation)	April 1, 2020	
206	Initial Sync	March 5, 2018	
208	Commercial Operation (FCM Obligation)	May 1, 2020	

Figures

**BEACON FALLS ENERGY PARK
BEACON FALLS, CONNECTICUT**

**Figure 1
Key Map**

DATE: 09/2016 PROJECT NO. 232127.000000.000000



Legend

Site Boundary

SOURCE(S):
Service Layer Credits: Copyright:© 2013
National Geographic Society, i-cubed

Figure 2: Location Map

LOCATION:
Beacon Falls, CT

Beacon Falls Energy Park

North arrow pointing up.

Map By: CMP
MMIH#: 1103-87
Original: 4/16/2015
Revision: 6/10/2015
Scale: 1 inch = 2,000 feet

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MXD: Y:\1103-87\Maps\Figure 2 (Location Map).mxd