

# Holland & Knight

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December 13, 2016

**VIA ELECTRONIC MAIL AND  
OVERNIGHT MAIL**

Melanie A. Bachman  
Acting Executive Director  
State of Connecticut  
Connecticut Siting Council  
Ten Franklin Square  
New Britain, CT 06051

Re: **PETITION NO. 1218** - PSEG Power Connecticut 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 new 485 megawatt (MW) dual fuel combined-cycle electric generating facility at the existing Bridgeport Harbor Station located at 1 Atlantic Street, Bridgeport, Connecticut

Dear Ms. Bachman:

Enclosed please one original and fifteen (15) copies of PSEG Power Connecticut LLC's ("PSEG") additional responses to the Connecticut Siting Council's interrogatories from December 9, 2016 related to PSEG's D&M Plan – Phase II.

If you require further information, or have any questions, do not hesitate to contact me at (212) 513-3473, or via email at [steve.humes@hklaw.com](mailto:steve.humes@hklaw.com).

Sincerely yours,

HOLLAND & KNIGHT LLP



Stephen J. Humes

Enclosures

cc: Meredith L. Hiller, Esq.  
Leilani M. Holgado, Esq.  
Michael Stagliola

Karl Wintermeyer  
David Hinchey  
James R. Morrissey, Esq.

Request from: Connecticut Siting Council

**CSC-D&M-19. Reference PSEG Power Connecticut LLC's (PSEG) response to interrogatory 14 for the Phase II Development and Management Plan (Phase II D&M Plan). Have osprey been recently observed on the existing nests in the vicinity of the oil dock?**

**Response:**

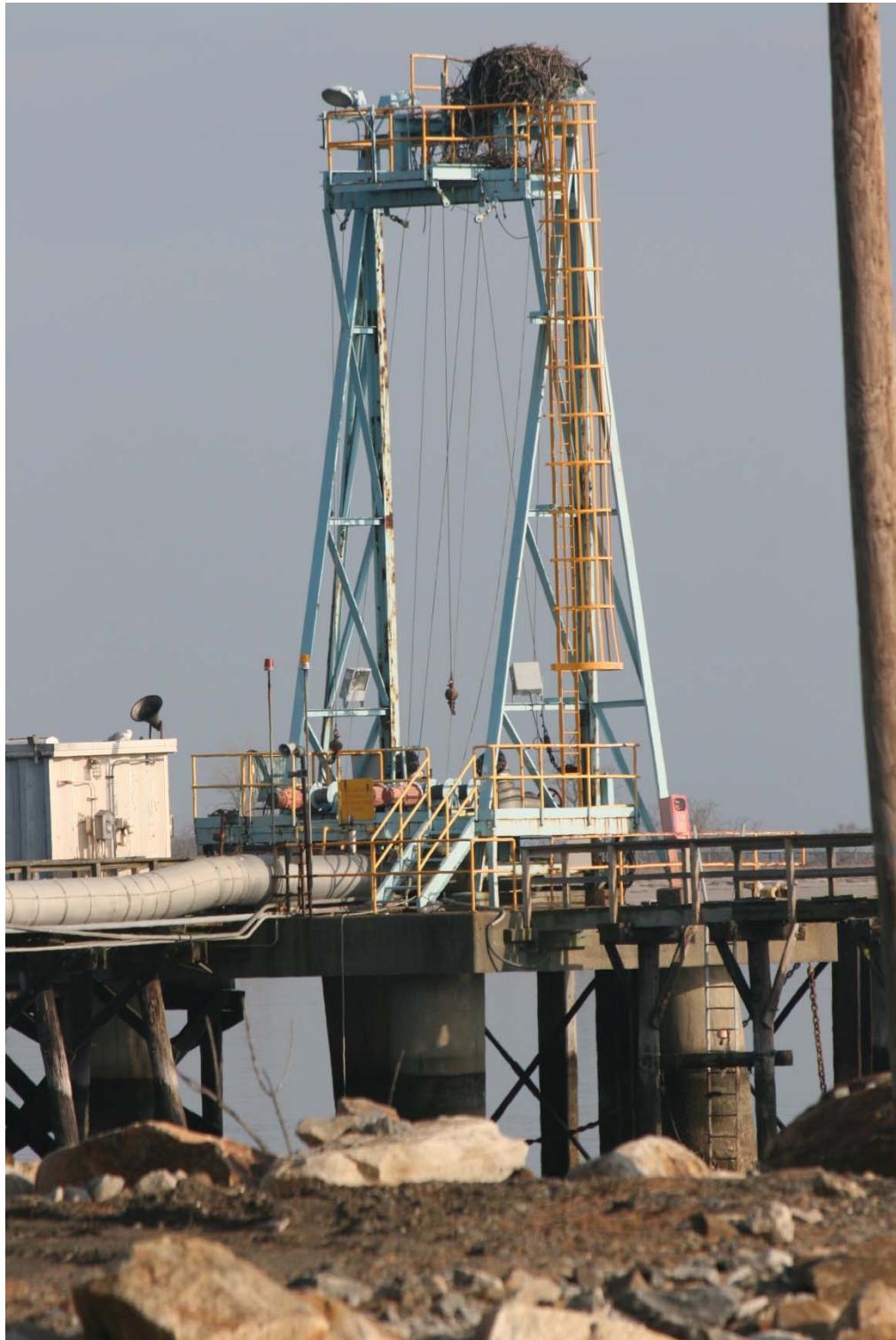
Yes, osprey nested on the Bridgeport Harbor Station (BHS) oil dock during the 2016 active nesting season. Exact dates were not logged, but the active nesting season is generally considered to be early to mid-March (when the birds return to the region and initiate nesting preparations), into the late summer and early fall, when the juvenile osprey fledge. There is not a “regulatory” timeframe; timing is established by the birds for each nest.

Osprey periodically nest on various elevated structures at the site. These structures include the center breasting dolphin oil gantry on the oil dock (see photographs below). Other locations where nests have been observed are the existing coal dock (coal unloading tower), the out-of-service east outer wing walkway on the oil dock, and the coal pile conveyor structures. These facilities are all currently or have recently been in-service on the BHS site, and no issues associated with the adjacent operational uses on nesting have been identified.

In early March 2016, PSEG notified and received CT DEEP acknowledgement that PSEG could remove the nest on the oil dock prior to the return of the osprey (i.e. prior to the nesting season). That nest was removed to ensure that temporary walkway repairs would not impact or disturb any nesting birds at that location. Upon the return of the osprey to the region later in the spring of 2016, the osprey re-established the nesting location and used it during the 2016 season. Walkway repairs were completed without identifying any avian issues. As noted above, osprey use was observed, but not tracked or logged.

If a need to remove a nest is identified subsequent to the initiation of nesting season (i.e. after the osprey have either constructed a new nest, or re-occupied a historically used nesting location), consultation with CT DEEP and the United States Fish and Wildlife Service (USF&WS) is required. Based on prior history of osprey nesting at the BHS site, PSEG does not anticipate that this will be necessary for BHS 5 construction. If needed, alternate nesting locations will be established in consultation with CT DEEP and USF&WS.

Similarly, PSEG does not anticipate that 2016 construction will result in impact concerns on any of the historic nesting locations. PSEG will monitor nesting during March and April to determine if any new nests are being constructed in areas that could be disrupted by construction and will undertake the appropriate consultation with CT DEEP and, if required, the USF&WS.



**Bridgeport Harbor Station Oil Dock – Center Breasting Dolphin**  
**March 8, 2016**  
**Looking Southeast**



**Bridgeport Harbor Station Oil Dock – Center Breasting Dolphin**  
**March 8, 2016**  
**Looking south**

Request from: Connecticut Siting Council

**CSC-D&M-20. Reference the response to interrogatory number two for the Phase II D&M Plan. Provide the approximate outside dimensions (including the heights) of the hydrogen and ammonia storage structures identified as number 502 and 551, respectively on drawing 191547-5GAU-G1001 in the Phase II D&M Plan. Would both structures and the handling of such hydrogen and ammonia comply with all applicable safety standards and the safety measures noted in Petition No. 1218 Findings of Fact Nos. 168 and 169?**

**Response:**

The Aqueous Ammonia Storage and Unloading Area is shown as ID No. 551 on the General Arrangement Drawing No. 191547-5GAU-G1001 submitted with Development and Management Plan Phase 2 (D&MP Phase 2) in Exhibit 2. It is approximately 67'-0" by 63'-6" with a unloading area of 19'-6" by 125'-0".

The equipment for Ammonia Storage and Unloading is considered outdoor equipment and is not included in a structure or building. The height of the Ammonia Tank including the foundation is approximately 14'-6" above grade. Both the unloading and forwarding (pumping) skids, as well as the secondary containment wall are shorter than the tanks. The ammonia storage tank will have a storage capacity of 20,000 gallons of 19% aqueous ammonia. The ammonia storage tank will be located inside a secondary containment structure that meets the applicable codes and standards. To ensure personnel safety, PSEG employees will be informed of all operation and maintenance requirements as well as all known hazards associated with 19% aqueous ammonia storage and handling. Safety measures will be consistent with Petition 1218; Findings of Fact No 168. The process safety and operating procedures included in D&MP Phase 2 - Exhibit 20 are illustrative of the safety precautions anticipated for storage and use of ammonia. Bridgeport Harbor Station Unit 5-specific procedures will be developed prior to initial ammonia deliveries to the site. In addition, three (3) safety shower/eye wash stations will be located at the ammonia unloading, storage and feed locations.

The Bulk Hydrogen System is shown as ID No. 502 on the same General Arrangement drawing referenced above. As with the ammonia equipment, the hydrogen storage is considered outdoor equipment and therefore, not within a structure or building. As noted in CSC-D&M-02 submitted December 2, 2016, bulk deliveries of hydrogen will be by over-the-road trailers. PSEG has not determined if installed hydrogen storage equipment or direct storage in the DOT certified trailers will be used, as the commercial aspects of such use have not yet been determined. If installed equipment will be used, it will be placed on a foundation pad measuring up to approximately 12' by 45'. A spill containment is not required for hydrogen.

If used, the installed design will include four cylinders in a rack sitting on the foundation pad along with a fill station. The four cylinders are horizontally mounted in a 2 by 2 configuration. The cylinder total height is approximately 4'-6" with a refueling pipe "stanchion" extending to approximately 9'-0" above grade. Note that the cylinders are expected to be fully or nearly fully masked by the adjoining sheetpile wall. Truck delivery will be used to recharge the cylinders as needed to support plant operations. The process safety and operating procedures included in D&MP Phase 2 - Exhibit 20 are illustrative of the safety precautions that are anticipated for storage and use of hydrogen. Bridgeport Harbor Station Unit 5-specific procedures will be developed prior to initial hydrogen deliveries to the site. The procedures will include the safety measures described in Findings of Fact No. 169.