

August 22, 2017

**VIA EMAIL & U.S. MAIL**

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

Re: **PETITION NO. 1248** - TRS 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 3.7 megawatt combined heat and power fuel cell facility to be located at 64 Triangle Street, Danbury, Connecticut

Dear Ms. Bachman:

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 ultimate parent company of TRS 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 or after August 31, 2017 by Eastern Mechanical Services, Inc. under the supervision of Thomas P. Reilly, P.E. of Salem Engineering, Inc. The attached procedure and identification of Mr. Reilly as the inspector were submitted to the office of the City of Danbury's Fire Marshal, and the attached comments from Fire Marshal Jim Russell were 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.

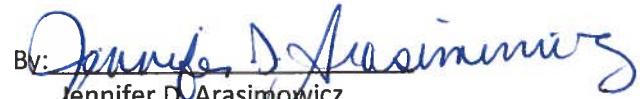
If you have any questions with respect to the foregoing, please contact the undersigned. Thank you for your consideration.

Respectfully submitted,

FUELCELL ENERGY, INC.

On behalf of

TRS FUEL CELL, LLC

By: 

Jennifer D. Arasimowicz

Senior Vice President, General Counsel &  
Corporate Secretary

FuelCell Energy, Inc.  
3 Great Pasture Road  
Danbury, CT 06810  
(203) 825-6070  
[jarasimowicz@fce.com](mailto:jarasimowicz@fce.com)

Encl.



**EASTERN MECHANICAL SERVICES, INC.**

**203.792.7668** • DANBURY, CT

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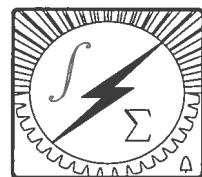
## **SALEM ENGINEERING, INC.**

25 Joseph Rd., Naugatuck, CT 06770

P.O. Box 70, Charlotte, VT 05445

Tel.: (802)-864-0280 Fax: (802)-864-0228

[www.salemengineering.com](http://www.salemengineering.com)



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July 1, 2017

**A. M. Rizzo Electric, Inc.**  
64 Triangle St. Danbury, CT 06810

**Attention: Mr. Tony Rebeiro, Chief Operating Officer, A.M. Rizzo Electric**  
**Ph:203-731-3131, Fx:203-731-3138, Email: arebeiro@rizzoelectric.com**

**Subject: Gas Pipe Cleaning Procedure for FCE SureSource 4000 Power Plant located at 64  
Triangle Street, Danbury, CT**

**Plant Type: Fuel Cell      Service:      Natural Gas**

**LINE REQUIRING CLEANING:**

There is one run of gas piping on this project, a 3" line approximately 55' long made of welded carbon steel. This gas line was installed in accordance NFPA 54 (2015 edition), ASME B31.3, Category D service and NFPA 853 (2010 edition). Per NFPA 54-8.3.1 (2015 edition) this line will require purging during the Fuel cell startup.

**CLEANING PLAN:** The following actions will be taken to ensure there is no large weld slag or construction debris in the pipe.

*A clean rag will be drawn through the pipe multiple times to ensure there is no construction debris or foreign matter remaining in the pipe. This shall be followed by a clean pass of a 3" sizing plug i.e. "pig" equal to GREENLEE 615 PISTON FOR 3" CONDUIT - IMC, RIGID or approved equal.*

1. An air compressor with 80 psig regulated output pressure, using ambient air will be used blow out any remaining dust and mill scale as follows: Temporarily direct the outlet end of the pipe run in a safe discharge direction. During this blowout, a rupture disk will burst at the discharge end of the line, resulting in a pressure surge through the pipe which results in an efficient scouring of the internal pipe wall without the use of chemical additives. Prepare four (4) discs of new truck tire tubing sized to allow a leak proof sandwich of the media between pipe flanges. Increase the air volume in the gas line under test until the sandwich of rubber layers bursts and blows out remaining oil film and debris. Repeat rupture blow four (4) times or as required to show negligible staining of a target located 5 feet from the rupture point. Suggested target material is a 4 x 8 x  $\frac{3}{4}$  plywood.
2. During the procedure the outlet area of the gas line will be restricted to those performing the blowing procedure.
3. After cleaning is complete the 3" line will be filled with nitrogen 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 as indicated by FCE during the fuel cell startup.

#### POST TEST AREA CLEANING

1. All blow-off residue shall be cleaned from the area so that the area is returned to its pre-test level of cleanliness.

This cleaning will be conducted on or after August 31, 2017, if so approved by the Owner.

Testing shall be observed by a principal from Eastern Mechanical Services, Inc. and by a Professional Engineer from Salem Engineering, Inc. A test report certifying the test results will be submitted within 10 working days following the test completion signed by Eastern Mechanical and by Salem Engineers responsible PE.

Respectfully Submitted,

X



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Ted Huizinga  
President, Eastern Mechanical, Inc.

X



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Thomas P. Reilly, PE  
Principal, Salem Engineering





**CITY OF DANBURY**  
**OFFICE OF COMMUNITY RISK REDUCTION**  
**FIRE MARSHAL**

155 DEER HILL AVENUE  
DANBURY, CONNECTICUT 06810

James Russell  
Fire Marshal

Phone 203-796-1541  
Fax 203-796-1561

**Eastern Mechanical Services**  
Mr. Ted Huizinga, President  
3 Star Street  
Danbury, Connecticut  
06810

**RE: Gas Pipe Cleaning Procedure for FCE SureSource 4000 Power Plant located at 64 Triangle Street, Danbury, Ct.**

Dear Mr. Huizinga,

I have read the procedure that you have supplied to our office and find it to be an acceptable method of cleaning this 55 foot gas line. Please keep in mind that after the cleaning is complete, the line is to be filled with nitrogen and left pressurized at 2-5 psi as outlined in NFPA 54-8.3.1.2. The 3" line will be purged in accordance with NFPA54-8.3.2.1 as indicated by FCE during the fuel cell start up.

Thank you very much for the information on this project. We appreciate your efforts.

Sincerely,

*Jim Russell*

Jim Russell  
Fire Marshal  
Danbury Fire Department