



# STATE OF CONNECTICUT

## CONNECTICUT SITING COUNCIL

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### VIA ELECTRONIC MAIL

November 22, 2016

Dawn Mahoney, Esq.  
General Counsel  
Doosan Fuel Cell America Inc.  
195 Governor's Highway  
South Windsor, CT 06074

RE: **PETITION NO. 1266** - Doosan Fuel Cell America, Inc. petition for a declaratory ruling that no Certificate of Environmental Compatibility and Public Need is required for the construction, maintenance, and operation of a 1840-kilowatt customer-side fuel cell facility to be located at the Waterbury Water Pollution Control Plant, 210 Municipal Road, Waterbury, Connecticut.

Dear Attorney Mahoney:

The Connecticut Siting Council (Council) requests your responses to the enclosed questions no later than December 6, 2016. To help expedite the Council's review, please file individual responses as soon as they are available.

Please forward an original and 15 copies to this office, as well as send a copy via electronic mail. In accordance with the State Solid Waste Management Plan and in accordance with Section 16-50j-12 of the Regulations of Connecticut State Agencies the Council is requesting that all filings be submitted on recyclable paper, primarily regular weight white office paper. Please avoid using heavy stock paper, colored paper, and metal or plastic binders and separators. Fewer copies of bulk material may be provided as appropriate.

Any request for an extension of time to submit responses to interrogatories shall be submitted to the Council in writing pursuant to §16-50j-22a of the Regulations of Connecticut State Agencies.

Yours very truly,

Melanie Bachman  
Acting Executive Director

MB/CW

c: Council Members

**Petition No. 1266**  
**Doosan Fuel Cell America, Inc.**  
**Waterbury Water Pollution Control Plant**  
**210 Municipal Road**  
**Waterbury, CT**  
**Interrogatories**

1. Please confirm the owner of the host property was provided notice of the proposed project and provide information regarding certified mail receipts for all recipients that were provided notice including the property owner, abutting property owners, state agencies, and state and local public officials.
2. Please provide a detailed site plan for the proposed facility including but not limited to, the dimensions and location of the proposed fuel cell facility, cooling module, concrete pads, fence design and bollards (if applicable) and utility connections.
3. Would the proposed fuel cell shut down in the event of a power outage? If so, does it have "black start" capability and the ability to automatically restart?
4. Could the facility continue operating during a power outage and provide seamless uninterruptable power?
5. What is the operational life of the facility?
6. Please provide an Emergency Response Plan for the proposed facility in accordance with Public Act 11-101, An Act Adopting Certain Safety Recommendations of the Thomas Commission.
7. Please identify media to be used for pipe cleaning procedures at the proposed facility in accordance with Public Act 11-101, An Act Adopting Certain Safety Recommendations of the Thomas Commission.
8. Which National Fire Protection Association (NFPA) or other codes and standards apply to fuel cell construction, installation and/or modifications?
9. Please provide a noise analysis for the proposed facility, including the cumulative effects of all four fuel cell units proposed, that shows compliance with state noise regulations at the property boundaries.
10. Would the proposed fuel cell provide baseload or backup power (or both) for the Waterbury Water Pollution Control Plant? What percentage of the plant's energy usage would the proposed fuel cell facility provide? Would any surplus power be sold to the grid?
11. Would any waste heat from the fuel cell be used for the building's internal use such as to provide or supplement domestic heating and/or hot water?
12. Would the proposed facility be enclosed by a fence? If so, provide the design specifications of the proposed fence. Has Doosan considered an anti-climb design? Would bollards be used to protect the fuel cell facility from being accidentally struck by vehicles?
13. What is the distance and direction of the nearest residence from the proposed fuel cell facility?
14. What is the municipal zoning of the host property? What surrounding land uses are adjacent to the host property?

15. What is the distance and direction of the proposed facility to the nearest airport? Did the petitioner provide notification to the Federal Aviation Administration regarding the proposed fuel cell facility?
16. Would the proposed facility be within the 100-year or 500-year flood zone? If so, could the proposed facility be raised to one-foot about the 100-year flood zone? Please provide a FEMA flood map showing the proposed facility.
17. Provide the distance and direction of the nearest wetland.
18. Is the proposed facility within a Department of Energy and Environmental Protection-designated Aquifer Protection Area?
19. What is the distance of the nearest portion of the proposed fuel cell facility to the nearest edge of the Naugatuck River?
20. Provide a table showing state criteria thresholds and projected cumulative emissions from the proposed facility for all greenhouse gases listed in the Regulations of Connecticut State Agencies Section 22a-174-1(49) with and without the use of waste heat.
21. Provide information regarding available technologies and/or mitigation techniques to reduce greenhouse gas emissions from the proposed facility.
22. Would the proposed facility's air emissions rate in pounds of CO<sub>2</sub> per megawatt-hour be lower than the eGRID non-baseload emissions rate for the ISO New England, Inc. territory?
23. Would methane (CH<sub>4</sub>) be emitted from the proposed fuel cell facility?
24. Does the amount of phosphoric acid in the fuel cell comply with the applicable state and federal regulations?
25. Natural gas has sulfur dioxide injected as an odorant. Please submit a desulfurization plan narrative for the proposed fuel cell facility containing the following information:
  - a) Chemical reaction overview concerning what substances are produced from the desulfurization process, as well as plans for their containment and transport;
  - b) How much solid sulfur oxide would result from the desulfurization process, and methods and locations for containment, transport, and disposal;
  - c) Whether any of these desulfurization substances are considered hazardous, and if so, plans for the containment, transport, and disposal of hazardous substances;
  - d) Anticipated method of disposal for any other desulfurization substances; and
  - e) Whether any gaseous substances resulting from desulfurization can be expected to vent from the fuel cells, as well as the applicable DEEP limits regarding discharge of these gasses.
26. If the proposed facility is approved, approximately when would construction commence and when is it expected to be completed and operational? What are the expected typical work hours and days of the week that construction would occur?
27. Provide a decommissioning plan for the proposed facility.