

January 9, 2018

**VIA EMAIL AND U. S. MAIL**

Ms. Melanie A. Bachman •  
Executive Director  
Connecticut Siting Council  
Ten Franklin Square  
New Britain, Connecticut 06051

**PETITION NO. 1317** – Broad Street Fuel Cell, LLC petition for a declaratory ruling that no Certificate of Environmental Compatibility and Public Need is required for the proposed construction, maintenance and operation of a 1.4 megawatt customer-side combined heat and power fuel cell facility to be located adjacent to and south of the Ferris Athletic Center at Trinity College, 300 Summit Street, Hartford, 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 Broad Street 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.

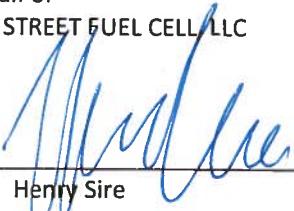
The attached pipe cleaning procedure specifies the method and media to be used to clean the natural gas piping. No known hazards are associated with the process. The pipe cleaning will be performed on or after January 24, 2018 by Notch Mechanical Constructors under the supervision of Philip E. Neveu, P.E. The attached procedure and identification of Mr. Neveu as the inspector were submitted to the office of the City of Hartford's Fire Marshal and no comments have been 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  
BROAD STREET FUEL CELL, LLC

By: 

Henry Sire  
Associate Counsel

FuelCell Energy, Inc.  
3 Great Pasture Road  
Danbury, CT 06810  
(203) 205-2481  
hsire@fce.com

Encl.

## Gas Pipe Cleaning Procedure for Trinity College Fuel Cell

### Line requiring cleaning:

There are two runs of gas piping on this project, a 3" line approximately 50' long made of carbon steel and a 1" line approximately 25' long made of Carbon steel. These gas lines will be installed in accordance NFPA 54, ASME B31.3, Category D service and NFPA 853. Per NFPA 54-8.3.1 the 3" line will require purging during the Fuelcell startup.

### Cleaning Plan:

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

#### 3" Gas Pipe:

1. A clean rag will be drawn through the pipe multiple times to ensure there is not construction debris or foreign matter remaining in the pipe. A small hand held mechanical air blower using ambient air will be used to blow out any remaining dust and mill scale. During the procedure the outlet area of the gas line will be restricted to those performing the blowing procedure.
2. 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.

#### 1" Gas Pipe:

1. A clean rag will be drawn through the pipe multiple times to ensure there is not construction debris or foreign matter remaining in the pipe. A small hand held mechanical air blower using ambient air will be used to blow out any remaining dust and mill scale. During the procedure the outlet area of the gas line will be restricted to those performing the blowing procedure.

### This cleaning will be conducted upon the completion of the system.

Sincerely,

Philip E. Neveu, P.E.  
CT License 22218  
Vice President - Engineering & Construction



#### VERMONT

MASTER PLUMBER PM-03659  
NATURAL GAS INSTALLER GN-03448 (H)

#### CONNECTICUT

MECHANICAL CONTRACTOR MEC 1094  
UNLIMITED HEATING, PIPING & COOLING HGT 0389011-51  
PLUMBING & PIPING UNLIMITED PLM-180742 PI

#### MASSACHUSETTS

MASTER PIPEFITTER PM-030953  
MASTER PLUMBER 13152  
REFRIGERATION CONTRACTOR 019404  
SPRINKLER CONTRACTOR SC-007053

#### RHODE ISLAND

MASTER PIPEFITTER I-00006420  
MASTER PLUMBER MP-002173  
MASTER REFRIGERATION 00007427

#### NEW HAMPSHIRE

MASTER PLUMBER 3965