



# STATE OF CONNECTICUT

## CONNECTICUT SITING COUNCIL

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### VIA ELECTRONIC MAIL

August 25, 2017

Dmitriy Kamenetskiy  
Project Manager  
FuelCell Energy, Inc.  
3 Great Pasture Road  
Danbury, CT 06810

**RE: 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 Mr. Kamenetskiy:

The Connecticut Siting Council (Council) requests your responses to the enclosed questions no later than September 7, 2017. 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  
Executive Director

MB/FOC

c: Jennifer D. Arasimowicz, Esq., FuelCell Energy, Inc.  
Henry Sire, Esq., FuelCell Energy, Inc.  
Council Members

**Petition No. 1317**  
**Broad Street Fuel Cell, LLC**  
**Trinity College**  
**300 Summit Street**  
**Hartford, CT**

**Interrogatories**

1. Were return receipts received for each abutting landowner identified in the petition? If not, list the abutters that did not receive notice and describe any additional effort to serve notice.
2. Was this project selected in a Connecticut Department of Energy and Environmental Protection (DEEP) or regional procurement? When? What RFP is the proposed project associated with?
3. 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.
4. Would the proposed fence have an anti-climb design? Would bollards be used to protect the fuel cell facility from being accidentally struck by vehicles?
5. Could the facility continue operating during a power outage and provide seamless uninterruptable power?
6. Petition page 2 states Trinity College and Broad Street Fuel Cell LLC have entered a Power Purchase Agreement, the term of which is 15 years. Is 15 years the anticipated life of the fuel cell project? If not explain.
7. Do the fuel cell media have to be changed? If so, at what intervals?
8. 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.
9. Petition Exhibit D, page 20 states "The entire plant has been designed to and complies with the provisions of the ANSI/CSA safety code FC-1 (2004)." Is this code now (2014)? If not, identify appropriate code.
10. What is the municipal zoning of the host property? What surrounding land uses is adjacent to the host property?

11. Would any tree clearing or grading be required for the proposed project?
12. Provide the distance and direction of the nearest wetland.
13. Is the proposed facility within a Department of Energy and Environmental Protection-designated Aquifer Protection Area?
14. 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?
15. Is methane (CH<sub>4</sub>) broken down to zero in the reforming process? Is there some small amount of CH<sub>4</sub> emissions that would still occur?
16. 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.
17. 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?
18. Provide a decommissioning plan for the proposed facility.
19. Will all power be consumed by Trinity College?
20. Petition Page 6 comments that approximately 1,000 Liters of nitrogen will be stored on site. Will the nitrogen be stored as a gas or liquid? Will this be used for cooling? How will it be stored; i.e., standard cylinders or cryogenic?

21. Petition Page 6, Figure 1, has an aerial view of the site which is the same view included in Exhibit A and Plot Plan Drawing No. 16-0024. Yet the surrounding area in this aerial view is vastly different from Exhibit C, Figure 1. Clarify the differences in these views. What dates are the photographs?
22. Petition pages 7 and 8 comment that an emergency generator will be installed. Exhibit A shows a photograph of an existing generator that will be relocated. Will the project use this generator or install an additional generator?
23. Petition pages 11 and 12 comment that the project will require water and will discharge approximately 3,200 gpd of wastewater. The petition then comments that the wastewater will be discharged to the existing Trinity College wastewater system, and that the project will register under CTDEEP's Miscellaneous Sewer Compatible Discharges General Permit (GP). This GP authorizes discharges to a POTW either directly via sanitary sewer or to a holding tank whose contents would periodically be transported to a POTW. Because the GP allows direct discharge to the POTW via sanitary sewer, why would the Trinity College wastewater treatment system be used? If indeed the project intends to use the Trinity College wastewater treatment system, would that no longer fall under the GP and then require a permit modification from CTDEEP to do so?