

PETITION NO. 1104 – The United Illuminating Company 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 2.2 MW AC solar }
photovoltaic facility and a 2.8 MW AC Fuel Cell facility on }
approximately 22 acres of the former Seaside Landfill located at 350 }
Waldemere Avenue, Bridgeport, Connecticut.

Connecticut

Siting

Council

October 29, 2014

DRAFT Findings of Fact

Introduction

1. The United Illuminating Company (UI), in accordance with provisions of Connecticut General Statutes (C.G.S.) § 16-50k and § 4-176(a), submitted a petition (Petition) to the Connecticut Siting Council (Council) on May 27, 2014 for a declaratory ruling that no Certificate of Environmental Compatibility and Public Need (Certificate) is required for the construction and operation of a 2.2 megawatt (MW) solar photovoltaic facility and a 2.8 MW Fuel Cell facility on City of Bridgeport property west of Barnum Dyke in the City of Bridgeport. (UI 1, p. 1, 8)
2. UI provided notice of its petition to all abutting property owners, federal, state and local officials and agencies identified in Regulations of Connecticut State Agencies (RCSA) § 16-50j-40(a). (UI 1, p. 15)
3. In compliance with RCSA § 16-50j-21, on August 29, 2014, UI installed three signs that contained a brief description of the project, public hearing information, and Council contact information. The signs were placed in the following locations: at the Seaside Park entrance at the corner of Iranistan and Waldemere Avenues; at the corner of Barnum Dyke and Barnum Boulevard; and at the west end of Seaside Park. (UI 6)
4. The Council and its staff conducted an inspection of the proposed project on September 11, 2014, beginning at 2:00 p.m. (Council Petition 1104 Field Review Notice dated September 5, 2014)
5. Pursuant to C.G.S. § 16-50m, the Council, after giving due notice thereof, held a public hearing on September 11, 2014, beginning with the evidentiary portion of the hearing at 3:00 p.m. and continuing with the public comment session at 7:00 p.m. at the Bridgeport City Hall, 45 Lyon Terrace, Bridgeport, Connecticut. The evidentiary hearing was continued on September 30, 2014. (Transcript 1 – September 11, 2014 at 3:00 p.m. [Tr. 1], p. 1; Transcript 2 – September 11, 2014, at 7:00 p.m. [Tr. 2], p. 1; Transcript 3 – September 30, 2014 at 11:00 a.m. [Tr. 3])
6. Pursuant to C.G.S. § 16-50m, the Council published a legal notice indicating the date and time of the September 11, 2014 public hearing and field review in the Connecticut Post on July 15, 2014. (Record)
7. The parties to the proceeding are UI and the City of Bridgeport (City). The intervenor is Enrique Torres. (Tr. 1, p. 5)
8. UI is an electric distribution company based in Orange, Connecticut. (UI 1, p. 4)

9. UI is proposing the 2.2 MW solar facility and the 2.8 MW fuel cell facility, two separate projects submitted to the Council in this petition for a declaratory ruling, in response to Public Act 11-80, Section 127, *An Act Concerning the Establishment of the Department of Energy and Environmental Protection and Planning for Connecticut's Energy Future*, that permits electric distribution companies to construct, own, or operate Class I renewable energy facilities. The Act further specifies that each company can manage up to 10 MW of renewable energy with each renewable generating facility rated between 1 MW and 5 MW. (UI 1, p. 5)
10. The State legislature established a renewable energy policy under C.G.S. § 16-35k where the development of renewable energy facilities is encouraged to the maximum extent possible. (UI 1, p. 12)
11. The Council is required to approve the project by a declaratory ruling, as long as the project meets Department of Energy and Environmental Protection (DEEP) air and water quality standards. (C.G.S. § 16-50k(a))

State Agency Comments

12. Pursuant to C.G.S. § 16-50j (g), on July 11, 2014 and October 1, 2014, the following State agencies were solicited by the Council to submit written comments regarding the proposed facility: Department of Energy and Environmental Protection (DEEP); Department of Public Health; Council on Environmental Quality; Public Utilities Regulatory Authority (PURA); Office of Policy and Management; Department of Economic and Community Development; Department of Agriculture; Department of Transportation (DOT); and Department of Emergency Management and Public Protection. (Council Correspondence dated July 11, 2014 and October 1, 2014)
13. The DOT submitted a letter indicating they had no comment. (DOT letter dated July 17, 2014)
14. DEEP submitted written comments on September 4, 2014. In its comments, DEEP reviewed the project's location as well as potential environmental impacts and indicated support for the proposal. (DEEP Letter dated September 4, 2014)
15. The Council did not receive comments from any other state agency. (Record)

Municipal Consultation

16. UI discussed and planned the project with the City beginning in 2010. (UI 1, Attachment 1)
17. The City appeared before PURA on April 4, 2012 in support of the project. (UI 1, p. 5, Attachment 1)
18. Public outreach for the petition included a press conference in October 2013, City Council Contracts Subcommittee meetings in January and February 2014, a public community forum in February 2014, a Parks Commission meeting in March 2014, and a City Council meeting in March 2014. (UI 1, p. 14)

Site Selection

19. UI used an analysis model to determine the suitability of the proposed site to support both the fuel cell and solar field components. The model included an examination of topography, available ground space, proximity to critical infrastructure, and site availability and current use. (UI 1, p. 5)
20. Once the site was selected, UI conducted a fatal flaw analysis to determine the suitability and viability of the proposed solar and fuel cell installations. (UI 1, Attachment 2)
21. In addition to the selected Bridgeport project site, UI considered other locations in Fairfield and New Haven Counties including one municipal beach property, three landfills, a water pollution control plant, and four properties owned by UI. (UI 4, Response 2)
22. The Bridgeport site was selected due to its limited potential for other types of development, size, proximity to existing utilities, and the City's support for the location. (UI 4, Response 3)

Project Description – Fuel Cell Facility

23. The proposed fuel cell component of the project would be located on a 2.1-acre parcel owned by the City. It is used for the storage of City Parks Department equipment. (UI 1, Attachment 4; Tr. 1, p. 22)
24. The parcel is bordered by Seaside Park to the south, Barnum Dyke and a helipad to the east, an abandoned parking lot to the north, and City property to the west used for mulch storage and processing. (UI 1, Attachment 4, Attachment 12)
25. The fuel cell would be located within an approximate 290-foot by 80-foot lease area south of Cedar Creek Drive, a road that extends west from Barnum Dyke to the mulch processing area. (UI 1, Attachment 4; Attachment 11 B; Tr. 1, p. 22)
26. The fuel cell facility would consist of a 2.8 megawatt molten carbonate fuel cell facility manufactured by Fuel Cell Energy (FCE) of Danbury, Connecticut. (UI 1, p. 10; Tr. 1, pp. 53, 96)
27. The fuel cell facility has a twenty year warranty. (Tr. 3, p. 285)
28. The major components of the fuel cell facility are two FCE fuel cell modules, a water treatment skid, and two inverters. The fuel cell facility is approximately 70 feet long by 44 feet wide by 13 feet high. An exhaust stack extends to 24 feet. (UI 4, Response 7, Figure EP-1; Tr. 1, pp. 28, 53)
29. UI would install standard 13.8-kV switchgear equipment that services both the solar and fuel cell facilities to the east of the fuel cell facility. (UI 1, p. 11)
30. The fuel cell facility and the switchgear would be enclosed by an eight-foot high chain link fence of one-inch mesh design. It would have barbed wire on top for additional security. (UI 4 Response 7; Tr. 1, pp. 24, 67)
31. The fuel cell facility would only have task lighting and would not be continuously illuminated at night. (Tr. 1, pp. 28, 84)

32. The fuel cell area currently has a ground elevation of 9 to 10.5 feet above mean sea level (amsl). (Tr. 1, p. 23)
33. UI would fill and raise the fuel cell facility area to an elevation of 14 feet amsl. (Tr. 1, p., 23)
34. A retaining wall would be installed on the north side of the fuel cell area to contain the raised area. The other side slopes would be surfaced with gravel. (UI 4, Response 7; Tr. 1, pp. 26-27)
35. The fuel cell facility would use 13,000 gallons of water per day, available from a nearby City water line. The fuel cell facility would discharge 6,500 gallons per day of wastewater to the City's wastewater treatment system. (UI 1, p. 16)

Project Description – Solar Facility

36. The proposed solar facility would be located on top of the City-owned Seaside Landfill located on a peninsula surrounded by Long Island Sound to the south, Black Rock Harbor to the west, Cedar Creek to the north, and Barnum Dyke, a road, to the west. Seaside Park occupies the south and west edge of the peninsula, outside of the proposed project area. (UI 1, Attachment 12-April 11, 2014 memo; UI 4, Response 6, Response 7, Figure 7b)
37. The landfill is approximately 46 acres in size and is generally elongated- rectangular in shape with steep sloping north and south sides tapering to a flat area along the top. The landfill varies in height with lower elevations at the west and east ends, rising to a height of approximately 80 feet amsl at its center. (UI 1, Attachment 6, p. ES-1; Attachment 12; UI 4, Response 7, Figure 7C; Tr. 3, pp. 337-338)
38. The landfill operated from 1938 to 1991 for municipal solid waste and from 1996 to 2000 for demolition waste. The city closed the main portion of the landfill in 2000. A 2-acre former hazardous waste disposal area is located adjacent to the northeast corner of the municipal landfill and is in the process of being closed. This area is outside of UI's project limits. (UI 1, Attachment 6, p. ES-1; UI 4, Response 14)
39. UI would lease a 22-acre area on the landfill for a 20 year term with two 5 year renewal increments. (Tr. 3, pp. 284-285)
40. UI would establish an approximate 11-acre solar field within the 22-acre lease area. (UI 4, Response 6)
41. UI would install 8,550 solar photovoltaic (PV) polycrystalline panels and associated ground equipment within the solar field. (UI 4, Response 11)
42. The PV modules are rated at 255 watts. (UI 1, Attachment 2 PV specification sheet)
43. The solar panels have a service life of 25-30 years and have a 14 to 16 percent efficiency rating. Associated electrical project components have a service life of 15 years. Electrical equipment would be replaced on an as needed basis in accordance with an Operations and Maintenance Plan. The overall efficiency of the solar project would degrade approximately 0.5 percent per year. (UI 4, Response 12; Tr. 1, pp. 76-77; Tr. 3, pp. 284-285, 374-376)

44. The panels would be installed at a pitch of 20 degrees to maximize the number of panels at the site. Although the optimum pitch for a PV panel is 35 degrees, installing panels at this angle on this site would result in shading to adjacent panels, reducing electrical output. (UI 4, Responses 13; Tr. 1, p. 39)
45. The project would produce the greatest amount of energy during summer peak. (Tr. 3, pp. 371-372)
46. The solar panels would be installed on the landfill using a ballast rack system. The panels would be 2 feet from ground level, extending to a height of 4.2 feet above grade and would be installed in a fixed position oriented to the south. (UI 1, p. 1; UI 4, Response 7 Sheet 7D, Response 11)
47. The panel racking system would be mounted to concrete blocks, each measuring 6 feet by 2 feet (UI 1, p. 9, UI 4, Responses 7, Sheet 7D; Tr. 3, p. 306)
48. The ballast system was chosen to avoid significant disturbance to the landfill cap. The cap consists of 24 inches of cover material, rated to a specific impermeability, and supports a vegetative layer consisting of mostly invasive plants and small diameter trees. (UI 1, pp. 7, 9; DEEP comments of September 4, 2014)
49. The existing slopes within the proposed solar field varies with the top of the landfill being almost level and side slopes reaching a grade of 14 percent. Approximately 75 percent of the solar field area has a grade between zero and eight percent. (UI 4, Response 9; Tr. 3, pp. 292-293)
50. UI would alter the grade as necessary so that each ballast would rest on a maximum grade of 7 percent. To grade the ballast area, UI may excavate up to six inches of cover material and install a gravel base under each ballast. (UI 4, Response 9, Response 10; Tr. 3, pp. 294-295)
51. The solar panel rows would be approximately 5 to 10 feet apart, depending on shading criteria. (Tr. 1, p. 40)
52. The solar field would extend for approximately 2,350 feet along the crest of the landfill with elevations ranging from 40 feet amsl on the east end, rising to 80 feet amsl at the center, and sloping down to 25 feet amsl on the west end. (UI 4, Response 7, Figure 7C)
53. The solar field would include three inverters and four transformers mounted on concrete pads. The installation of the electrical pads would require the excavation of 4 to 6 inches of landfill cover material. (UI 4, Response 7, Figure 7C, Response 10)
54. The inverters would convert the solar generated power from 600 volts direct current and convert it to 380 volts alternating current (AC). The transformer converts the AC power to a distribution voltage of 13.8 kV. (Tr. 1, p. 41)
55. Wiring connecting the panels to the inverters would be installed within conduits on the panel racking system. (Tr. 1, pp. 40-41)
56. The electrical line from the transformers would be installed underground in a concrete conduit adjacent to the solar field access road. UI would use fill and some excavation of the landfill cover material to install the conduit two feet below grade. (UI 4, Response 10; Tr. 1, p. 42)

57. The electrical connection would extend overhead from the switchgear on new utility poles and transition to underground line along Barnum Dyke and Atlantic Avenue before reaching existing UI electrical systems. (UI 4, Response 7, Figure 7b; Tr. 1, pp. 42-43)
58. The proposed solar field access drive would extend from the mulch processing area, ascending the northeast side of the landfill along an existing access way. The proposed drive would extend along the north edge of the solar field, accessing the transformer/inverter pads. (UI 4, Response 7, Figure 7C)
59. The proposed 15-foot wide gravel access drive would be constructed by adding approximately 12 inches of processed stone on top of the existing access way. Remaining areas of the access drive would require some excavation of the landfill cap to create a level surface. Installation of the proposed access drive would require a disruption permit from DEEP specifying road design criteria for allowable load bearing pressure. (UI 4, Response 7, Figure 7C; Tr. 1, p. 44; Tr. 3, pp. 294-295)
60. The solar field would be enclosed by an eight-foot high chain link fence with two-inch mesh, anchored by concrete ballasts. The fence would not have barbed wire on top. An access gate would be installed at the base of the access drive. (UI 4, Figure 7D; Tr. 1, pp. 36, 67)
61. Installation of the fence ballasts would require the excavation of approximately 12 inches of landfill cover. (UI 4, Response 10; Tr. 1, pp. 66)
62. Light fixtures would not be installed around the solar field. (Tr. 1, p. 381)
63. The panels would be cleaned once per year using water. (Tr. 1, p. 57)
64. Snow is expected to slide off the panels or melt. UI would not manually remove snow. (Tr. 1, p. 57)

Environmental Considerations

65. Land use within a half-mile of the project consists of parkland, residential, commercial, and industrial. The nearest residential area to the project is approximately 0.2 miles northwest of the west end of the solar field, across Black Rock Harbor. Several marinas front Black Rock Harbor north and west of the landfill. (UI 4, Response 4, Figure 4; Torres 8; Tr. 3, pp. 229-233)
66. Seaside Park is 195 acres in size with a majority of the parkland occurring east of the site. The landfill area is approximately 41 acres of which 11.3 acres would be used for the solar facility. The fuel cell facility and associated switchgear is 0.38-acres in size. (UI 4, Response 6)

Wildlife and Habitat

67. UI's initial consultation with DEEP regarding state threatened or endangered species at the site identified five bird species listed in DEEP's Natural Diversity Database (NDDB) recorded in the vicinity of the landfill. (UI 1, Attachment 12)
68. UI performed a habitat review and determined no suitable habitat was present within the proposed project area for these species. (UI 1, Attachment 12, Attachment 14)

69. DEEP reviewed the project again and issued a NDDDB determination letter on May 16, 2014 identifying an additional bird species, the horned lark, and three plant species, sickle leaved golden aster, beach needle grass, and sand dropseed, which could occur within the project limits. DEEP recommended field studies to determine the presence of these four species. (UI 1, Attachment 13; Tr. 3, pp. 326-328)
70. UI completed site surveys for these four species in August 2014 and concluded there was no suitable habitat within the project area to support these species. (UI 5)
71. DEEP concurred with the assessment report and further noted that an American Kestrel, a state threatened bird, was observed during the survey work. The habitat report identified a snag tree at the west end of the landfill land, beyond the project limits, as a suitable kestrel nesting site. DEEP recommended that UI establish a 500-foot buffer zone around any nesting kestrels observed during project work. (UI 5; DEEP comments of September 4, 2014)
72. Vegetative cover on the landfill is of low diversity, dominated by mugwort, an invasive plant that is generally three feet in height. Another prevalent invasive plant, the common reed is found mainly on the northern and southern sides on the landfill. Small stands of trees are interspersed along the landfill with a small grove of mulberry trees at the top. More mature trees are found along the lower north slope of the landfill. (DEEP comments of September 4, 2014; UI 1, Attachment 12)
73. UI would remove all trees within the project area. Other trees or shrubs not in the project area or affecting the project would remain. (Tr. 1, pp. 34-35)
74. UI would cut the existing vegetation to a low height prior to construction. Once construction is completed, UI would mow as necessary to maintain a vegetative height that remains below the solar panels. (Tr. 1, pp. 34-35; Tr. 3, pp. 345-352)
75. Any bare soil that results from construction activities would be seeded with native grasses. (Tr. 3, p. 346)

Wetlands

76. A small wetland, approximately 530 square feet in size, was identified in a depressed area on top of the west end of the landfill and within the proposed solar field. (UI 4 Wetland Report)
77. The wetland was formed when the landfill was capped and graded. Its soil classification is “dump.” (UI 4 Wetland Report)
78. The wetland has little biological value as it is dominated by mugwort and path rush. (UI 4 Wetland Report)
79. UI would fill the wetland to construct the solar field. A permit from the U.S. Army Corps of Engineers would not be required for this activity. (Tr. 1, pp. 37-39)

Historic Resources

80. The project area is located adjacent to the Seaside Park Historic District, a district listed in the National Register of Historic Places. (UI 4, Response 6; Torres 1)

81. The Seaside Park Historic District extends from Soundview Drive at its east end to Fayerweather Island at its west end, a distance of approximately 2.5 miles. The island is connected to the Seaside peninsula by a breakwater. The eastern end of the park was designed by Frederick Law Olmsted. The western end of the park, adjacent to the present day landfill, was added to the park between 1895 and 1912 by filling marshland. (Torres 1; Tr. 3, pp. 251-252)
82. The National Register of Historic Places nomination form included a narrative and an accompanying map to delineate the boundaries of the historic district. The narrative specifically excludes the landfill area from the area encompassed by the national register nomination. (Torres 1; Tr. 3, p. 274)
83. Two historic buildings dating from 1918, a bathhouse and a stable, are located approximately 0.26 miles east northeast of the edge of the solar field. The stable is approximately 320 feet south of the fuel cell location. (UI 4, Response 26; Torres 1)
84. Barnum Boulevard extends west from Barnum Dyke and serves a one-mile long beach area (west beach) within the historic district. (UI 4, Response 26; Torres 1)
85. The Black Rock Historic District is located 0.3 mile west of the proposed solar field. The district is centered along Ellsworth Street and Seabright Avenue and includes frontage along Black Rock Harbor. (Council Administrative Notice 6; Tr. 3, p. 233; Torres 8)
86. The State Historic Preservation Office, in correspondence submitted to UI, stated the proposed project would have no adverse effect to the Seaside Park Historic District with the condition that the solar field be adequately screened with plants consistent with Olmsted's original design for the park. UI intends to install plantings to screen the fence as necessary, although the type of plants to be used has not been determined. (UI 3; Tr. 1, p. 50; Tr. 3, pp. 316-317)

Other Environmental Considerations

87. The existing grade of the fuel cell location is within the Federal Emergency Management Agency (FEMA) designated 100 year flood zone, using flood hazard mapping dated July 2013. The flood elevation was established at 13 feet amsl. (Tr. 1, p. 23; Tr. 3, pp. 312-313)
88. FEMA does not use the 500 year flood zone designation in coastal areas such as the Seaside Park area. (UI 4, Response 25-FEMA flood map, Response 32; Tr. 1, pp. 25-26)
89. UI proposes to raise the ground elevation of the fuel cell location to a height of 14 feet amsl by adding 2,300 cubic yards of fill. (UI 4, Response 32; tr. 1, p. 23)
90. The solar field is not within the FEMA designated 100-year flood zone. (UI 4, Response 25-FEMA flood map)
91. The solar field and fuel cell locations would not require storm water control structures or features. (UI 1, Attachment 15; UI 4, Response 7, Sheet EP-1)
92. The solar panels would cause rain water to flow over a drip edge, but once on the ground it would be dispersed overland following natural grades. UI is not altering the contours of the existing landfill and intends to retain as much of the existing groundcover as possible. (UI 4, Response 22; Tr. 3, pp. 304-307)

93. The concrete ballasts would create a minimal impervious surface, not altering storm water flow significantly. (UI 1, Attachment 15, p. 6)
94. UI would monitor the solar field for erosion issues at regular intervals. Although not expected, any channelization that occurs could be controlled through the installation of gravel beneath panel drip edges or the addition of organic materials such as wood chips or fiber matting to stabilize eroded surfaces. (UI 4, Response 23)
95. Prior to construction, erosion and sedimentation controls would be installed around soil-disturbing work areas. (Tr. 3, pp. 293-294)
96. UI conducted a settlement study and determined the landfill was settling at an expected rate. Given the age of the landfill, it would continue to settle a few inches over a five-year period. (UI 4, Response 16; Tr. 1, pp. 46-49; Tr. 3, p. 341)
97. The weight of the solar equipment may cause another inch or two of landfill cap settlement. The equipment would not cause any breaks in the landfill cap. (Tr. 1, p. 49)
98. If the angle of the solar panels are altered during landfill settlement, UI would adjust the panels as necessary to maintain maximum power output. (Tr. 1, pp. 48-49)
99. The fuel cell units would not generate noise above background levels to adjacent receptors. (Tr. 1, pp. 28-29)
100. The project would not require a New Source Review air permit. (UI 1, p. 18; DEEP comments of September 4, 2014)

Visibility

101. Portions of the solar field (fence and/or arrays) would be visible from select areas surrounding the site. Specific locations with visibility of the solar field are as follows:

Location	Approximate Distance/Direction to Site	Solar field Visibility (leaf-off conditions)
West Beach Bath House (historic district)	0.08 mile northwest	30% visible
South End of Barnum Ave. (historic district)	0.32 mile northeast	60 % visible
Seaside Park ball field (historic district)	0.56 mile southwest	20% visible
Bostwick Ave. (across harbor)	0.16 mile southeast	75% visible
Captains Cove (across harbor)	0.18 mile southeast	75% visible
Bloodroot Restaurant, Ferris St. (across harbor)	0.38 mile southeast	75% visible
Fayerweather Yacht Club (across harbor)	0.15 mile east	80% visible
Black Rock Yacht Club (across harbor)	0.63 mile northeast	45% visible
Grovers Ave. (across harbor)	0.79 mile northeast	45% visible
Interstate 95	0.85 mile southeast	80% visible
Barnum Dyke	0.29 southwest	25% visible
Sound View Drive near ball field (historic district)	0.53 mile west	10% visible

(UI 4, Response 26, Response 27; Tr. 1, p. 62; Tr. 3, p. 318)

102. The solar field fence and arrays would be visible from limited locations along the west beach area of Seaside Park through gaps in existing vegetation. Areas with visibility to the west and north are across the harbor as there is no vegetation or buildings to obscure the view. (UI 4, Response 26; Tr. 1, p. 63; Tr. 3, pp. 314-315)
103. In general, the layout of the solar field serves to limit its visibility as it is confined to the upper, flatter portions of the landfill with a vegetative cover consisting of trees around its base. Installing solar panels on the steep sides of the landfill would increase the solar field's visibility. (Tr. 3, pp. 277-278, 296-297)
104. Reflective glare would not be a concern to the receptors across the harbor to the north as the panels would be tilted to the south, with the reflective side oriented toward Long Island Sound. (Tr. 3, p. 382)
105. The project would not be a hazard to air navigation. The Federal Aviation Administration examines sun glare as part of its review of solar projects. (UI 2; Tr. 1, p. 52)
106. The fuel cell unit would be visible along Barnum Dyke. (UI 4, Response 26)
107. Water vapor emissions from the fuel cell may be visible in colder months. (Tr. 3, p. 368)

Public Safety

108. DEEP has been involved with landfill operations and subsequent closure requirements since the early 1980's. DEEP issued a tentative landfill Stewardship Permit to the City in May 2010. The permit listed obligations the City is required to complete to ensure proper closure of the landfill, including, but not limited to the following: maintenance of the landfill cover, quarterly inspections of the landfill cover, maintenance of the groundwater system, and semi-annual sampling and analysis of groundwater and surface water. (UI 1, Attachment 6, pp. 3-3, 3-7)
109. UI would be responsible for the maintenance of the landfill cap and quarterly inspection requirements within the solar field area. Inspections reports would be submitted to the City. (Tr. 3, pp. 291-292)
110. UI would be required to obtain a DEEP Disruption Permit and an approved Post Closure Use Plan for the solar field facility. UI is developing documentation to satisfy DEEP's requirements. (Tr. 3, pp. 288-289)
111. The fuel cells use natural gas for energy production. The natural gas is used in a chemical reaction rather than combustion. There is no explosive hazard with the electrical generation process. (Tr. 1, pp. 52-53)
112. The Bridgeport Fire Department has previously received fuel cell emergency response training as part of the operations plan for an existing 15.5 MW fuel cell facility located in the City. (Tr. 1, pp. 53-54)
113. The Bridgeport Fire Department as well as other Bridgeport service departments would be involved with the design process and would receive all necessary training for site emergencies. (UI 1, pp. 14, 17-18; Tr. 1, pp. 53-54)

114. Solar field components consist mainly of silica-based panels, concrete and metal and would not combust if there was a brush fire. (Tr. 1, p. 56; Tr. 3, p. 286)
115. The fire department would be trained for emergency response at the solar field. A health and safety plan and an emergency response plan would be prepared by UI prior to system operation. (Tr. 3, pp. 286-287)
116. The solar array system would be designed to withstand 110 mile per hour wind speeds. (Tr. 1, pp. 67, 90-91)
117. The project electrical systems are monitored remotely. (Tr. 1, p. 69)



Figure 1: Project location and area features. (UI 4, Response 4)

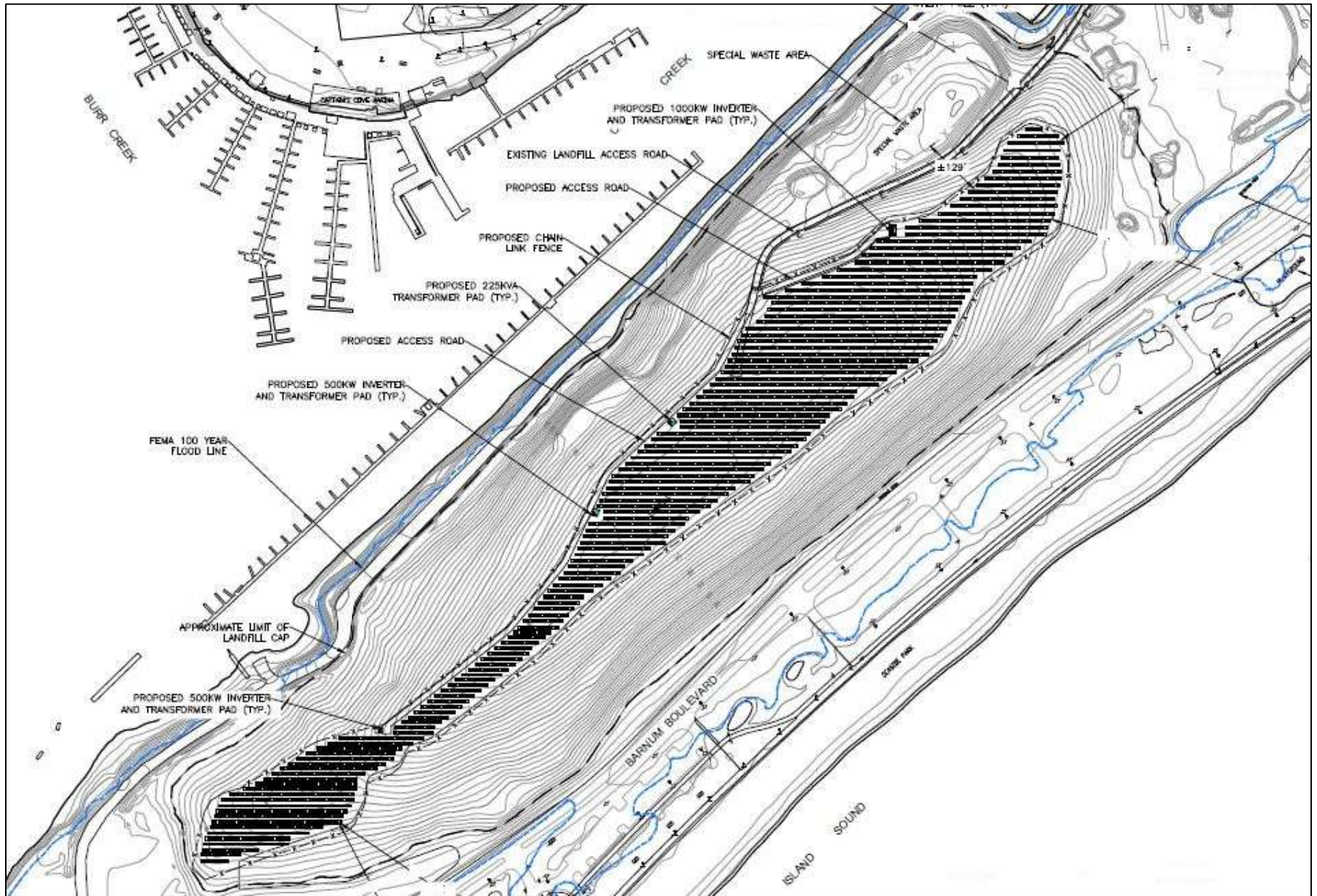


Figure 2: Proposed Solar Field. (UI 4, Response 7)

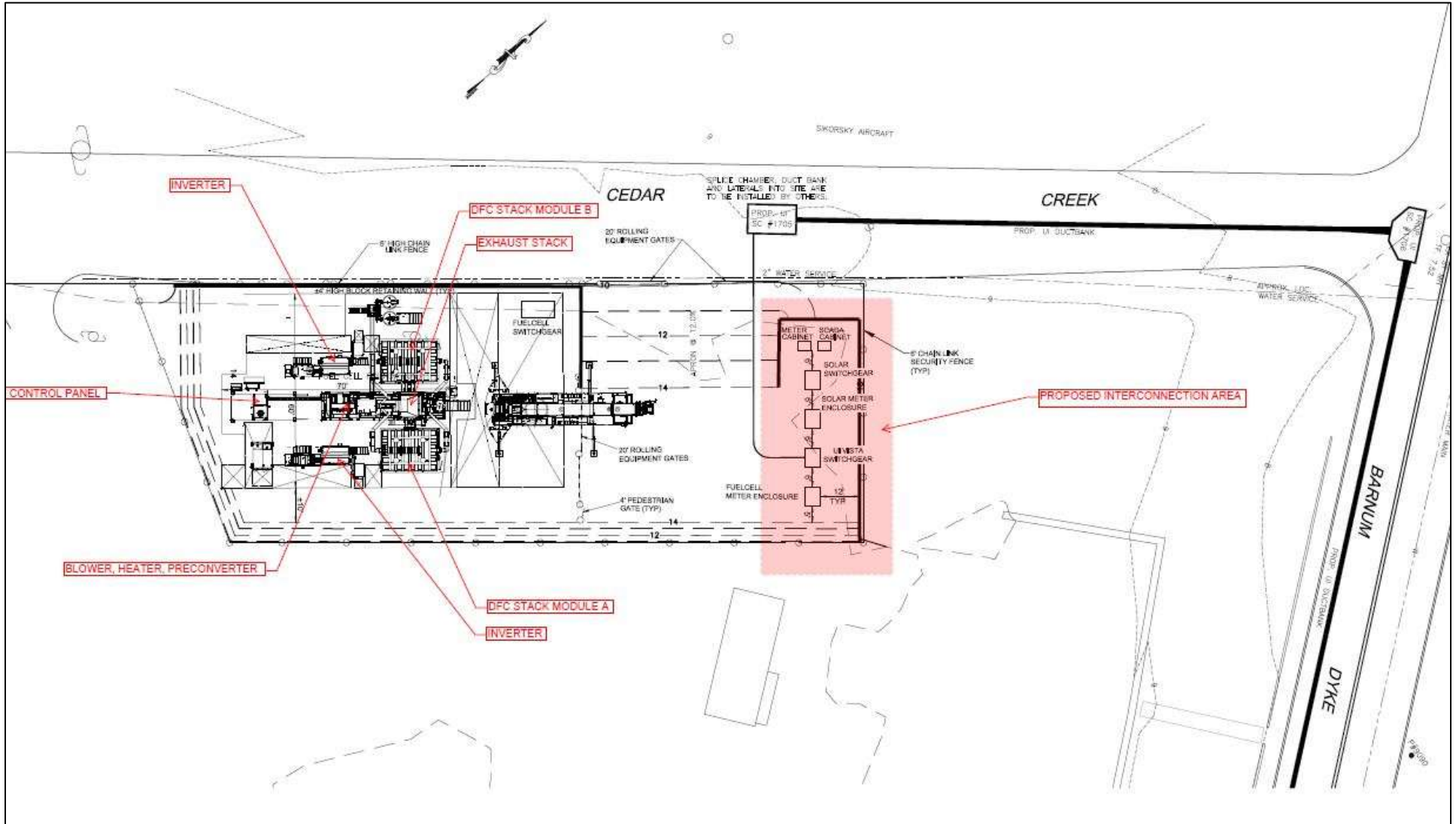


Figure 3: Proposed Fuel Cell layout. (UI 4, Response 7)



Figure 4: Solar field photo-simulation with solar array and chain link fencing depicted on top of landfill. View location is from Barnum Boulevard at west end of Seaside Park. (UI 4, Response 26, photo-simulation 2)



Figure 5: Fuel cell photo-simulation from Seaside Park - west beach entrance on Barnum Dyke. (UI 4, Response 26, photo-simulation 14)