



# STATE OF CONNECTICUT

## CONNECTICUT SITING COUNCIL

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### VIA ELECTRONIC MAIL

June 23, 2016

Josh Abrams  
Doosan Fuel Cell America, Inc.  
195 Governor's Highway  
South Windsor, CT 06074

**RE: PETITION NO. 1236** – 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 440-kilowatt customer-side combined heat and power fuel cell facility to be located at New Britain High School, 110 Mill Street, New Britain, Connecticut.

Dear Mr. Abrams:

The Connecticut Siting Council (Council) requests your responses to the enclosed questions no later than July 7, 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.

Yours very truly,

Melanie Bachman  
Acting Executive Director

MB/MP

c: Dawn Mahoney, Esq., General Counsel, Doosan Fuel Cell America, Inc.  
Council Members



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Affirmative Action / Equal Opportunity Employer

**Petition No. 1236**  
**Doosan Fuel Cell America, Inc.**  
**110 Mill Street**  
**New Britain, CT**  
**Interrogatories**

1. On page 2 of Doosan Fuel Cell of America, Inc.'s (Doosan) Petition (Petition) dated June 14, 2016, Doosan notes that the proposed fuel cell would provide backup power. In the event of a power outage, would the fuel cell first shut down and then automatically "black start" to restore power, or would it continue running seamlessly despite the loss of grid power (i.e. provide uninterruptible power)? Explain.
2. Would the fuel cell facility also include the cooling module as indicated on back of the specifications sheet (Attachment B of the Petition)? Would the cooling module release the waste heat when it is not being used for supplementing the building's heating? Was the cooling module factored into the noise analysis on page 5 of the Petition?
3. Page 5 of the Petition notes that "The closest neighbor/residence is across Meadow Street..." Was "Mill Street" intended?
4. On pages 3 and 4 of the Petition, Doosan estimates that the facility would reduce annual carbon dioxide emissions by over 120 metric tons when compared to the marginal emissions rate in the Northeast grid utility system. Is this based on the fuel cell's electricity output displacing grid power only? If yes, is it correct to say the total carbon dioxide reduction would be even higher because utilizing the fuel cell's waste heat would reduce the run time of the building's boilers?
5. 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.
6. 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.
7. Would bollards be used to protect the fuel cell facility from being accidentally struck by vehicles? Would the fuel cell be installed on a concrete pad? Is a fence proposed around the fuel cell? If yes, while the typical mesh size for chain link fences is two-inch, has Doosan considered a mesh size of less than two inches as anti-climbing measure?

8. Provide a site plan to depict the proposed fuel cell's location, utility connections and other items such as cooling module, bollards, fencing, etc., if applicable.
9. Attachment A of the Petition shows the fuel cell facility on a grass area. Is it correct to say that no trees would be removed to construct the facility, and the facility would not be located in wetlands?
10. Would the proposed fuel cell be located within a 100-year or 500-year flood zone? If yes, estimate the 100-year and 500-year flood elevations and provide the proposed flood mitigation (e.g. elevate unit one foot above 100-year flood elevation).
11. What statutes and/or regulations govern fuel cell emissions for the proposed facility?
12. Provide a table showing state criteria thresholds and projected emissions from the proposed facility for all greenhouse gasses listed in the Regulations of Connecticut State Agencies Section 22a-174-1(49).
13. 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.
14. If this project is approved by the Council on July 21, 2016, approximately when would construction commence and be completed? Provide the projected construction hours and days of the week, e.g. Monday through Friday 7:00 a.m. to 5:00 p.m.