

STATE OF CONNECTICUT  
CONNECTICUT SITING COUNCIL

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WATERSIDE POWER, LLC )  
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Petition No. 836

PREPARED DIRECT TESTIMONY OF  
DONALD C. DiCRISTOFARO  
ON BEHALF OF  
WATERSIDE POWER, LLC  
Petitioner

STATE OF CONNECTICUT

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PREPARED DIRECT TESTIMONY OF DONALD C. DICRISTOFARO

PETITION FOR DECLARATORY RULING THAT NO CERTIFICATE OF ENVIRONMENTAL COMPATIBILITY AND PUBLIC NEED IS REQUIRED

1 **Q: Please state your name, position and business address.**

2 A: My name is Donald C. DiCristofaro. I am the President of Blue Sky  
3 Environmental, LLC. My business address is 105 Chestnut Street,  
4 Suite 37, Needham, Massachusetts 02492.

5 **Q. On whose behalf are you testifying?**

6 A. Waterside Power, LLC.

7 **Q: Please summarize your professional and educational**  
8 **background.**

9 A: I have over 25 years of environmental permitting experience,  
10 specializing in air quality modeling, the siting and environmental  
11 permitting of energy and industrial facilities, and environmental  
12 regulations and permitting requirements.

13 I received my Bachelor of Science and Masters degrees in  
14 Meteorology from The Pennsylvania State University in 1978 and

15 1980, respectively. I am a Certified Consulting Meteorologist (No.  
16 472) as designated by the American Meteorological Society.

17 From 1981 to 1985, I was an environmental scientist at Environmental  
18 Research and Technology (now ENSR) working primarily on the EPA-  
19 sponsored Complex Terrain Model Development Program. At the  
20 project conclusion, the Complex Terrain Dispersion Model (CTDM  
21 and CTSCREEN) was developed as an EPA regulatory model which  
22 is currently recommended for use by the EPA. In 1985, I became one  
23 of the founders of Sigma Research Corporation, an environmental  
24 consulting company specializing in air quality model development,  
25 verification, and permitting. I was Vice President, member of the  
26 Board of Directors, and Treasurer (for two years) at Sigma Research.

27 While at Sigma Research, I was the project manager for numerous  
28 air quality modeling analysis and environmental permitting projects. I  
29 was responsible for the air quality modeling and permitting for the  
30 existing Bellingham NEA cogeneration facility and carbon dioxide  
31 recovery facility. In 1991, Sigma Research was sold to HMM  
32 Associates (later to be sold to Earth Tech) where I was Vice President  
33 and Project Manager for numerous environmental permitting projects.  
34 In April 1995, I became the Vice President of Environmental Affairs at

35 the I-Group. At the I-Group, a company that specialized in energy  
36 projects, I was responsible for the environmental permitting and  
37 compliance of all existing assets including two 300-MW cogeneration  
38 facilities, a carbon dioxide recovery facility, a paper recycling and de-  
39 inking facility, and a steam generating facility. I was also responsible  
40 for the environmental permitting associated with the development of  
41 all new projects including a 700-MW gas-fired cogeneration facility  
42 and paper recycling and de-inking facilities.

43 In March 2002, I began work at Earth Tech. As the Manager of the  
44 Energy and Air Engineering Group, I was the leader of 16 environmental  
45 engineers and meteorologists responsible for the permitting and air  
46 quality analyses of projects ranging from emergency generators to large  
47 power plants to complicated industrial facilities. I was also responsible  
48 for the day-to-day operations and long-range planning of the group and  
49 for the business development activities of the group with revenues of  
50 \$2.5 million.

51 In April 2004, I founded Blue Sky Environmental LLC to provide air  
52 permitting and regulatory compliance services to clients throughout the  
53 United States, particularly in Connecticut. I have been responsible for

54 the air permitting and regulatory compliance of Waterside Power since  
55 2002.

56 **Q: Have you ever appeared as an expert witness before any**  
57 **regulatory agencies?**

58 A: Yes. I presented testimony to the Council in Petitions No. 772 and  
59 617E on behalf of Waterside Power. In addition, I have testified  
60 before the Massachusetts Energy Facilities Siting Board in generating  
61 facility cases, most recently in EFSB 97-5, a proceeding involving  
62 IDC-Bellingham's proposal to construct a 700-megawatt generating  
63 facility.

64 **Q: What is the purpose of your testimony in this case?**

65 A: I have overall responsibility for all aspects of the environmental  
66 analysis for the Project. In that capacity, I will serve as the general  
67 environmental witness regarding environmental issues as well as  
68 federal, state, and local environmental permitting issues.

69 **Q: Which sections of the Petition are you responsible for?**

70 A: I am responsible for Sections VII through VIII although I can address  
71 environmental issues related to all Sections of the Petition.

72 **Q: Were all the materials referenced above either reviewed by you,**  
73 **or prepared by you or under your supervision and control?**

74 A. Yes.

75 **Q. Are there any updates or corrections to those sections which**  
76 **you wish to make at this time?**

77 A: Yes. In December 2007, on behalf of Waterside, I filed a New Source  
78 Review Application for a new black start generator to operate in  
79 conjunction with the existing turbines. Currently, Waterside has a  
80 temporary black start generator of approximately 1,250 kilowatts  
81 ("kW"). Operation of the black start unit is governed by R.C.S.A.  
82 §22a-174-3b, which limits the use of the generator to emergency  
83 purposes.

84 Waterside is requesting permission to replace this existing unit with a  
85 permanent Atlantic Detroit Diesel-Allison ("ADDA"), or equivalent,  
86 1000 kW diesel genset, an EPA Tier II certified engine.

87 **Q. Are you submitting any additional documents or analyses as part**  
88 **of your testimony at this time?**

89 A: Yes, I have attached the December 2007 NSR Permit Application for  
90 the new Black Start Engine at Waterside Power to this prefiled  
91 testimony. As demonstrated in the Application, the proposed EPA  
92 Tier II certified unit will limit emissions of criteria pollutants such as  
93 carbon monoxide ("CO"), nitrogen oxide ("NO<sub>x</sub>"), particulate matter

94 ("PM"), particulate matter less than 10 microns ("PM<sub>10</sub>"), volatile  
95 organic compounds ("VOC"), sulfuric acid mist, lead and mercury to  
96 thresholds below emissions allowed under regulations promulgated  
97 by the Environmental Protection Agency ("EPA") as well as DEP.  
98 Thus, the use of the new black start generator as proposed by  
99 Waterside will not have any significant impact on the environment  
100 while improving the reliability of service of the Project during  
101 instances of local distribution system disruptions.

102 **Q. Does this complete your testimony?**

103 **A. Yes.**