



STATE OF CONNECTICUT  
DEPARTMENT OF ENVIRONMENTAL PROTECTION



February 26, 2008

Daniel Caruso, Chairman  
Connecticut Siting Council  
10 Franklin Square  
New Britain, Connecticut 06051

RE: 350 MW Peaking Generation Facility  
Bridgeport Energy II, LLC  
Bridgeport, Connecticut  
Petition No. 841

Dear Chairman Caruso:

The Department of Environmental Protection has reviewed the above referenced *Petition for Declaratory Ruling* that the installation and operation of a 350 MW peaking power generation project at the Bridgeport Energy facility will not have substantial adverse environmental effects and will not require a *Certificate of Environmental Compatibility and Public Need*. No site visit was undertaken during the Department's review of the petition. The following comments are offered for your consideration.

As noted in the petition, applications for the air permits required for the project have been filed with the Department; they are presently undergoing technical review and modeling. The turbine models identified on pages 5 and 12 of the Petition are "General Electric's 7FA/7B or Siemens' SGT6-5000F." Staff of the Air Engineering & Enforcement Division report that in the air application "General Electric model 7FA or Siemens model SGT6-5000F" are proposed. General Electric model 7B is not listed in the air application. It should be noted that, in addition to the requirements outlined in the petition, Bridgeport Energy II, LLC will be required to purchase NO<sub>x</sub> emission offsets.

Attachment G to the petition is the *Coastal Site Plan Review Application Support Document* submitted to the City of Bridgeport. The Office of Long Island Sound Programs reports that the coastal site plan was approved at the January 28, 2008 meeting of the Planning & Zoning Commission.

The General Notes on Attachment I, *Preliminary Grading & Drainage Plan*, indicate the Bridgeport City Datum is 13.51 feet below NGVD-1929. Based on the elevations appearing on the plan, the datum appears to be above NGVD. The first floor elevation of the facility is 25.5' which is approximately 1 foot above the 100-year flood elevation, while the fuel oil tank is at 25.0'. In order to comply with Federal flood management regulations, which are incorporated into local building and zoning codes, it should be confirmed that the storage of all hazardous

materials will be above the 100-year flood elevation. For example, the elevation of the aqueous ammonia storage area, while just beyond the 25' contour, is not indicated on the plan.

The facility will require registration for two general permits for stormwater, as noted below.

Stormwater discharges from construction sites where one or more acres are to be disturbed require a permit pursuant to 40 CFR 122.26. The Permitting & Enforcement Division has issued a *General Permit for the Discharge of Stormwater and Dewatering Wastewaters Associated with Construction Activities* (DEP-PERD-GP-015) that will cover these discharges. For projects disturbing five or more acres, registration describing the site and the construction activity must be submitted to the Department prior to the initiation of construction. A stormwater pollution control plan, including measures such as erosion and sediment controls and post construction stormwater management, must be prepared. A goal of 80 percent removal of total suspended solids from the stormwater discharge shall be used in designing and installing stormwater management measures. For construction projects with a total disturbed area between one and five acres, no registration is required as long as the project is reviewed by the town and receives written approval of its erosion and sediment control measures and it adheres to the *Connecticut Guidelines for Soil Erosion and Sediment Control*. If no review is conducted by the town or written approval is not provided, the permittee must register with the Department. For further information, contact the division at (860) 424-3018. A copy of the general permit as well as registration forms may be downloaded at:  
[http://www.ct.gov/dep/cwp/view.asp?a=2709&q=324212&depNav\\_GID=1643#StormwaterConstructionGP](http://www.ct.gov/dep/cwp/view.asp?a=2709&q=324212&depNav_GID=1643#StormwaterConstructionGP).

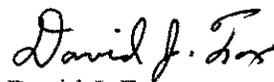
The discharge of stormwater from certain industrial areas requires a permit pursuant to EPA regulations. The Permitting & Enforcement Division issued a *General Permit for the Discharge of Stormwater Associated with Industrial Activity* (DEP-PERD-GP-014) that will cover these discharges. The industrial activities that require a permit are defined in the regulations by Standard Industrial Classifications. Registration describing the facility and the stormwater discharge must be submitted to the Department prior to the initiation of the industrial activity. A stormwater pollution prevention plan, including measures such as a monitoring program, controls for outside storage of materials, spill control plan, maintenance and inspection, employee training and recordkeeping, must be prepared. For further information, contact the division at (860) 424-3018. A copy of the general permit as well as registration forms may be downloaded at:  
[http://www.ct.gov/dep/cwp/view.asp?a=2709&q=324212&depNav\\_GID=1643#StormwaterIndustrialGP](http://www.ct.gov/dep/cwp/view.asp?a=2709&q=324212&depNav_GID=1643#StormwaterIndustrialGP).

The Natural Diversity Data Base, maintained by DEP, contains no records of extant populations of Federally listed endangered or threatened species or species listed by the State, pursuant to section 26-306 of the Connecticut General Statutes, as endangered, threatened or special concern in the project area. This information is not the result of comprehensive or site-

specific field investigations. Current research projects and new contributors continue to identify additional populations of species and locations of habitats of concern as well as enhance existing data. Such new information is incorporated into the Data Base as it becomes available. Also be advised that this is a preliminary review and not a final determination. A more detailed review may be conducted as part of any subsequent environmental permit applications submitted to DEP for the proposed site.

Thank you for the opportunity to review this project. If there are any questions regarding these comments, please contact me at (860) 424-4111 or [david.fox@po.state.ct.us](mailto:david.fox@po.state.ct.us).

Sincerely,



David J. Fox

Senior Environmental Analyst  
Office of Environmental Review

cc: Michael Perrone, CSC  
Robert Kaliszewski, DEP/OPPD  
Valerie Galo, DEP/AEED  
John Gaucher, DEP/OLISP  
Sharon Yurasevecz, DEP/TWRD