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June 7, 2017

Todd Anthony Bianco
Coordinator
Rhode Island Energy Facility Siting Board
89 Jefferson Boulevard
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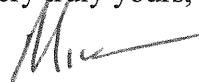
Re: Invenergy Thermal Development LLC – Clear River Energy Center
Docket No. SB-2015-06

Dear Dr. Bianco:

Enclosed for filing in this matter are an original and 10 copies of the Town of Burrillville's 27th Set of Data Requests to Invenergy Thermal Development LLC. Electronic copies have been sent to the service list.

If you have any questions, please feel free to call.

Very truly yours,



Michael R. McElroy

MRMc:tmg

cc: Service List

STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS
ENERGY FACILITY SITING BOARD

IN RE: INVENERGY THERMAL DEVELOPMENT LLC's :
APPLICATION TO CONSTRUCT THE CLEAR RIVER : DOCKET No. SB-2015-06
ENERGY CENTER IN BURRILLVILLE, RHODE ISLAND :

**THE TOWN OF BURRILLVILLE'S 27th SET OF DATA REQUESTS TO
INVENERGY THERMAL DEVELOPMENT LLC**

- 27-1 a. What is the blast radius of 3,000 scf of hydrogen gas?
b. What is the blast radius of 15,000 scf of hydrogen gas?
c. What is the blast radius if hydrogen gas and natural gas from the proposed plant exploded?
d. What is the blast radius if hydrogen gas and natural gas from the proposed project and Algonquin /Spectra compressor station exploded?
- 27-2 What is the evacuation zone for the project? Please explain.
- 27-3 Why has Invenergy chosen to use compressed hydrogen gas for its emission reductions instead of Nitrogen gas?
- 27-4 Hydrogen tube trailer(s):
- a. How many scf (standard cubic feet) of hydrogen will be stored via the tube trailers at the facility?
b. How many "hydrogen tubes" will be contained in one hydrogen tube trailer?
c. How many hydrogen tube trailers will be stored at the facility at one given time?
d. What is the maximum number of hydrogen tube trailers that could be stored at the facility at one time?
e. How many smaller hydrogen cylinders will be stored at the facility at one given time, i.e. hydrogen cylinders not on the hydrogen tube trailer(s)?
- 27-5 Will any other pressurized gas be stored on site besides the hydrogen gas? If so, please list the type of gas, total scf stored on site, size of cylinders, and number of cylinders.

- 27-6 What are the companies from which Invenergy/CREC may purchase the following:
- a. ULSD?
 - b. Ammonia?
 - c. Hydrogen tube trailers?
 - d. Demineralization trailers?
- 27-7 What are the possible routes of the following:
- a. ULSD tankers will take?
 - b. Ammonia tankers will take?
 - c. Hydrogen Tube Trailers will take?
 - d. Demineralization trailers will take?
- 27-8 Will the proposed power plant be a peaker plant or a base plant? Please explain.
- 27-9 Is Invenergy/CREC able to guarantee that there will be no blasting during construction? Please explain.
- 27-10 Will there be on-site permanent housing for contractors during construction? Please explain.
- 27-11 What is the estimated ammonia emissions in pounds per year which will be released from the ammonia tank and the piping systems?
- 27-12
- a. Why isn't there a maximum water demand/need per year set forth in the new "Water Supply Plan" and in the signed Water Agreement with Johnston? Please explain.
 - b. What prevents the proposed facility from using over and above the maximum number of water trucks listed in the "Water Supply Plan"? Please explain.
 - c. Is there anything in the Johnston contract that allows the facility to use more water other than the words "approximately" or "estimated to be"? Please explain.
 - d. Can you guarantee that the proposed facility will always use the volume of water as outlined in the new "Water Supply Plan"? If not, what is Invenergy's/CREC's estimated/approximated maximum water demand/year? Please explain.
 - e. Can you guarantee that the proposed facility will always use the recycling system as outlined in the new "Water Supply Plan"? Please explain.

- 27-13 On page 5 of “Water Supply Plan” it states: “Based on the annual average cycle makeup water demand, this is equivalent to approximately one trailer needing to be regenerated per month. To provide operational flexibility and avoid trailer demurrage charges, a higher volume of water may be processed through the demineralizer trailers than required for plant operation and the excess water stored in the demineralized water storage tank. Each demineralizer trailer is able to make approximately 400 gallons per minute of demineralized water from the municipal water supplied to the Facility.” Is Invenergy/CREC planning to have an option of utilizing more than one demineralizer trailer at a time?
- 27-14 How quickly (minutes) will the CREC facility be able to shut down in case of fire? Please explain.
- 27-15 Will the emergency shutdown procedure time-frame be different when firing 2 turbines on natural gas vs 1 turbine firing natural gas and 1 turbine firing ULSD? Please explain.
- 27-16 Spectra has provided an “evacuation zone” and an “incineration zone” for all of its compressor stations (already built and in process of acquiring permits from FERC). Please provide a map showing both the CREC and Algonquin/Spectra compressor station “evacuation zone” and “incineration zone”.
- 27-17 Will the Demineralizer trailer be “stored” on a site with secondary containment? If the Demineralizer leaks to the ground surface will this water affect the wetlands in the area? Please explain.
- 27-18 On page 8 of the “Water Supply Plan”, it states: “Any wastewater stream that might be generated by the filtration system will be collected in a wastewater disposal tank or sump and hauled off-site for disposal at a POTW or other facility licensed to receive and treat these wastewaters. The filtered wastewater may still contain low amounts of oil/grease. The oil/grease can be removed by several types of filter pre-coats such as activated carbon....”.
- a. What POTW has Invenergy either already contacted or is thinking about contacting?
 - b. What chemicals found in the waste stream will make it impossible for a POTW to treat thus making it necessary for “other facility licensed to receive and treat these wastewaters”?
 - c. What “other facility” (not a POTW) has Invenergy contacted or is thinking of contacting?
- 27-19 What chemicals will be used to clean the boilers? Please supply MSDS sheets.
- 27-20 What other chemicals (liquid, gas, or solid) (hazardous or non-hazardous) not listed in the original application submitted to the EFSB, supplements, data request responses, or other written materials will be on site? Please provide the approximate storage quantities of each (gallons, liters, pounds, tons, scf, etc.) on site.

- 27-21 a. What would be the blast radius of the total volume of hydrogen stored in a hydrogen tube trailer?
- b. What would be the blast radius of a pipeline explosion?
- c. What would be the blast radius of a natural gas explosion from the compressor station?
- d. What would be the blast radius of (a) & (b) together?
- e. What would be the blast radius of (a) & (c) together?
- f. What would be the blast radius of (a), (b) & (c) together?
- 27-22 Concerning the dual fired power plant spreadsheet attached to Data Request Response #18-2:
- a. Out of the 26 listed dual fired power plants how many are peaker plants? Please list by name, MW, and location.
- b. How many power plants on the list are firing natural gas directly from a main pipeline? Please list by name, MW, and location.
- c. How many power plants on the list have MW capacity of 100 MW or below? Please list by name, MW, and location.
- d. How many power plants on the list are owned by towns or cities and actually use electricity generated by them? Please list by name, MW, and location.
- e. How many (if any) power plants on this list are considered “at risk” by ISO-NE? Please list by name, MW, and location.
- f. Why weren’t power plants (and corresponding data) which only fire distillate oil (as they also are called upon by ISO-NE during times when natural gas is in short supply) included in this list? Please explain.
- 27-23 Concerning Data Request Response #18-2:
- a. Please provide the “publicly available spreadsheet” supposed to be found at https://www.iso-ne.com/static-assets/documents/2015/12/rcpf_event_data_from_may_2015.xlsx. This link cannot be accessed.
- 27-24 If the Facility is approved by the EFSB and the construction phase is over, the Service/Fire Water Storage tank and the Demineralized Water storage tank must be filled.
- a. How many tankers of water will be needed to fill these two tanks?
- b. How many tankers per day will there be and for how many days?
- c. Where are these tankers’ “Truck Emissions” (Exhibit 4 of Data Request Response #22) in the table provided?

- d. What are these tankers' VOC, THC, CO, NO_x, PM_{2.5}, PM₁₀ and CO₂ emissions for the period answered in #27 above (in lbs/day and total for the period of time provided in your answer to #27)?
 - e. How many times will the Demineralizer trailer need to be replaced over this period of time?
- 27-25 If the Facility is approved by the EFSB and the construction phase is over, the Ammonia storage tank must be filled. Please answer the same questions as #27 (a) through (d) (above) for the ammonia tankers.
- 27-26 Please revise the "Annual Emissions Summaries" Table (Exhibit 4 from Data Request Response #22) to include a "Filling of All Liquid Tanks Prior to Operations". Also, please provide calculations of the data.
- 27-27 If the only portions of the Facility's technology which has changed includes 1) changing from the RO/EDI to mobile Demineralizing systems and 2) maximum recycling of water:
- a. Why is the total volume to the "Steam/Water Cycle" changed from 54 gpm (in the original application "Average Ambient Conditions"- 2 turbines firing natural gas) to 33 gpm (in the new Water Supply Plan's "Average Ambient Conditions" – 2 turbines firing natural gas)?
 - b. Why is the total volume to the "Steam/Water Cycle" changed from 63 gpm (in the original application "Summer Ambient Conditions" – 2 turbines firing natural gas) to 40 gpm (in the new Water Supply Plan's "Summer Ambient Conditions" – 2 turbines firing natural gas)?
- 27-28 Note 9 ("Facility Water Balance" Sheets 1-4, 2-4, and 3-4) and Note 14 ("Facility Water Balance" Sheet 4-4) state: "HRSG Blowdown will be routed to the wastewater collection tank only during startup and plant upset conditions."
- a. What will the gpm of water from this HRSG Blowdown be during startup of the plant?
 - b. What are the possible "plant upset conditions"? Please list and describe in detail all possible "plant upset conditions" scenarios and state resulting gpm to the wastewater collection tank.
 - c. This HRSG Blowdown (regardless of the plant function, i.e., startup or "plant upset conditions"), implies that this increase in flow to the wastewater collection tank will result in more wastewater tanker traffic to and from the facility.
 1. Is this true? Please explain.
 2. How many more wastewater tankers will be needed during a "normal" startup?
 3. How many more wastewater tankers will be needed during each of the "plant upset conditions"?

- 27-29 What are the Facility Startup water demands? Please explain with specifics.
- 27-30 What are the Facility Shutdown water demands? Please explain with specifics.
- 27-31 What are the Facility Emergency Shutdown water demands? Please explain with specifics.
- 27-32 During a Facility Emergency Shutdown, will there be any “blow-off” of natural gas? Please explain and please include the estimated scf of natural gas released during the “blow-off”.
- 27-33 If there are any blow-offs of natural gas, what will be the maximum dBA of such an event? Please include the maximum dBA levels at the closest residents’ property lines as well as the maximum dBA level at Invenergy/CREC property lines.
- 27-34 Do the emissions (tons/year) listed in the Appendix 4 (Data Request Response #22) “Annual Emissions Summaries” include the trucks arriving at the Facility and the trucks leaving the facility?
- 27-35 Will Invenergy/CREC redo the application “Application for Approval of Plans to Construct, Install, or Modify Fuel Burning Equipment” (specifically, for Gas Turbine #1/HRSG #1, Gas Turbine #2/HRSG #2) as the total number of days that Invenergy/CREC/”Facility” will fire ULSD has changed from 60 to 30?
- 27-36 Questions on smoke stacks:
- a. Are the two main stacks still 200 feet above grade? If not, please provide heights.
 - b. What equipment will be releasing emissions to the 35-foot stack(s)? How many 35-foot stacks will there be?
 - c. What equipment will be releasing emissions to the 50-foot stack(s)? How many 50-foot stacks will there be?
- 27-37 Retention Pond questions:
- a. What are the dimensions of the retention pond (which will collect precipitation)?
 - b. How many gallons will the retention pond hold?
 - c. Where is the “outfall” of the retention pond?
 - d. Will the water in the retention pond be tested prior to allowing the water to flow to the “outfall”?
- 27-38 Why is the NOx water injection system shown in the “Facility Water Balance” sheets shown as coming directly from the demineralized water storage tank when it is in fact actually attached to other equipment?

- 27-39 Please explain the issue of “ammonia slip” in the NO_x (SCR system) in detail. How will Invenergy/CREC/ guarantee that there will be no or minimal “ammonia slip”?
- 27-40 The SCR will use ammonia at the catalyst to reduce the amount of NO_x in the emissions. The “oxidation catalyst system” will reduce the amount of carbon monoxide and VOC’s in the emissions. Please explain the “oxidation catalyst system” in detail. What are the chemicals in the oxidation catalyst system which interact with the CO and the VOCs?
- 27-41 What is the noise (dBA) difference between:
- “normal operations” of 1 Turbine firing ULSD/1 turbine firing natural gas and 2 turbines firing ULSD?
 - “normal operations” of 2 turbines firing natural gas and “emergency shutdown” of 2 turbines firing natural gas?
 - “normal operations” of 2 turbines firing natural gas and “normal shutdown” of 2 turbines firing natural gas?
 - “normal operations” of 2 turbines firing natural gas and “startup” of 2 turbines firing natural gas?
 - “normal operations” of 1 turbine firing natural gas/1 turbine firing ULSD AND “emergency shutdown” of 1 turbine firing natural gas/1 turbine firing ULSD?
 - “normal operations” of 1 turbine firing natural gas/1 turbine firing ULSD and “normal shutdown” of 1 turbine firing natural gas/1 turbine firing ULSD?
 - “normal operations” of 1 turbine firing natural gas/1 turbine firing ULSD and “startup” of 1 turbine firing natural gas/1 turbine firing ULSD?
- 27-42 Please provide data on the noise levels of diesel tankers/trucks along Wallum Lake Road in respect to the residents living along this portion of the route. Please give details (i.e., actual noise values at offset intervals).
- 27-43 What are the Particulate Matter negative health impacts of diesel tankers’/trucks’ emissions on human beings or wildlife?
- 27-44 Will Invenergy/CREC guarantee that no trees will be cut down during all bird breeding (including egg hatching and feeding infant birds) and migratory seasons? If not, why not?
- 27-45 What steps will Invenergy/CREC take (e.g., add technology) to reduce the low-octave band/low frequency noise at the Facility? Please explain.

Respectfully submitted,
Town of Burrillville
By its attorneys



William C. Dimitri, Esq. #2414

Town Solicitor

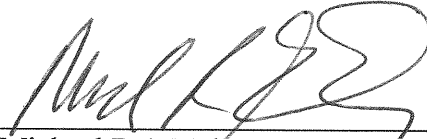
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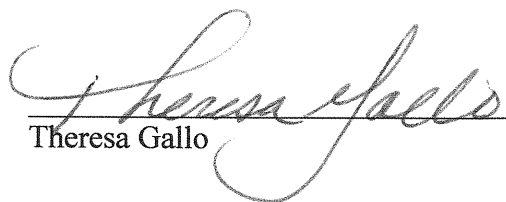
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Date: June 7, 2017

CERTIFICATE OF SERVICE

I hereby certify that on the 7th day of June, 2017, I sent a copy of the foregoing to the attached service list.



Theresa Gallo

Burrillville/Invenergy/EFSB/Data Requests Set 27

SB-2015-06 Invenergy CREC Service List as of 05/26/2017

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