

February 21, 2017

**Via Federal Express/Electronic Mail**

Todd Anthony Bianco, EFSB Coordinator  
RI Energy Facilities Siting Board  
89 Jefferson Blvd.  
Warwick, RI 02888

**Re: *Invenergy Docket No. SB-2015-06***

Dear Mr. Bianco:

On behalf of Invenergy Thermal Development LLC (“Invenergy”), enclosed please find an original and 10 copies of Invenergy’s Responses to the Town of Burrillville’s 23<sup>rd</sup> Set of Data Requests.

Please let me know if you have any questions.

Very truly yours,



ALAN M. SHOER  
[ashoer@apslaw.com](mailto:ashoer@apslaw.com)

Enclosures

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 ENERGY CENTER IN  
BURRILLVILLE, RHODE ISLAND

DOCKET No. SB-2015-06

**INVENERGY THERMAL DEVELOPMENT LLC'S RESPONSES TO  
THE TOWN OF BURRILLVILLE'S 23<sup>rd</sup> SET OF DATA REQUESTS**

23-1                      Regarding the water plan, will the newly proposed water treatment system add any mechanical equipment to the site that could produce noise, such as might be associated with a zero liquid discharge system (crystallizer pumps, vapor compressors or brine recirculation pumps), for example? If so, what measures are planned to ensure that this additional noise is adequately mitigated so that the facility remains in full compliance with the Town of Burrillville's noise limits at all times?

RESPONSE 23-1                      There is no new equipment that will produce noise that changes the results of the noise model or report that was previously submitted.

Under the water plan that was previously submitted, and that which was modeled acoustically, all noise-producing water treatment equipment, such as pumps and the reverse osmosis system, were contained inside the Water Treatment Building. In the acoustic model of the Clear River Energy Center (CREC or Facility), a noise level of 85 dBA was assumed inside this building based on measurements at other sites. The building was modeled assuming standard steel construction with ventilation openings. Resulting noise levels at the nearest residences due to this source only were more than 20 dBA below the total and, therefore, not a contributing factor at all. The revised water supply plan (Water Supply Plan or Plan) involves a smaller Water Treatment Building, due primarily to the elimination of the reverse osmosis and electrodeionization system. The new Plan adds portable demineralization trailers, which house only tanks and pipes but not pumps. The only noise source inside the trailers is flowing water. If one assumes a conservatively high noise level of 80 dBA inside these trailers, as well as the sound transmission loss of a standard 'semi-trailer', the resulting noise levels at the nearest residences are again more than 20 dBA less than the total and, therefore, non-contributing. In summary, the revised water treatment system will produce less noise than the previous system and is not a contributing factor to overall noise levels at nearby residences.

RESPONDENT:                      John Niland, Invenergy Thermal Development LLC

Mike Hankard, Hankard Environmental Acoustical Consultants

DATE:                                  February 21, 2017

STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS  
ENERGY FACILITY SITING BOARD

IN RE: INVENERGY THERMAL DEVELOPMENT LLC's  
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23-2                    Have you ever constructed a natural gas/oil fired electric generating facility of the size and magnitude of the CREC, whose process water demands were addressed with drinking water from a public water supply, delivered by truck, in the manner you are now proposing? If not, are you aware of any similar existing facilities? Please explain in detail.

RESPONSE 23-2        Invenergy Thermal Development LLC (Invenergy) has not constructed a natural gas/oil fired electric generating facility with the same design features as proposed for CREC as posed by this question. Process water source and demand are unique features of nearly every electric generating facility.

Invenergy has constructed six natural gas fired electric generating facilities and has a seventh under construction. Some, but not all of them, also fire oil. Invenergy's St. Clair, Ontario, Grays Harbor, WA, Nelson, IL and Lackawanna, PA facilities all have larger water demands than CREC. The water supply for Invenergy's Cannon Falls, MN, Spindle Hill, CO and Lackawanna, PA facilities are all supplied with water from a public water supply. Invenergy's facilities in St. Clair, Ontario, Nelson, IL, Grays Harbor, WA and Ector County, TX source their water from either rivers or wells. All of these facilities use a pipeline to deliver water.

The water savings technologies identified under the Water Supply Plan were utilized to minimize consumption and, therefore, allow for the delivery of water by truck. It is Invenergy's understanding that Ocean State Power (OSP) utilizes trucked water for its wet cooled plant. It is also Invenergy's understanding that the water plan for the proposed Exelon West Medway LLC generation project in Massachusetts includes trucking water as a back-up source of supply, if needed.

RESPONDENT:            John Niland, Invenergy Thermal Development LLC

DATE:                    February 21, 2017







INVENERGY THERMAL DEVELOPMENT LLC  
By its Attorneys,

/s/ Alan M. Shoer

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Dated:

CERTIFICATE OF SERVICE

I hereby certify that on February 21, 2017, I delivered a true copy of the foregoing responses to the Town of Burrillville's 23<sup>rd</sup> Set of Data Requests via electronic mail to the parties on the attached service list.

/s/ Alan M. Shoer

**SB-2015-06 Invenergy CREC Service List as of 02/13/2017**

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