# Schacht & McElroy

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September 16, 2016

Todd Anthony Bianco Coordinator Rhode Island Energy Facility Siting Board 89 Jefferson Boulevard Warwick, RI 02888

Re:

Invenergy Thermal Development LLC – Clear River Energy Center

Docket No. SB-2015-06

Dear Mr. Bianco:

Enclosed for filing in this matter are an original and 10 copies of the Town of Burrillville's 17<sup>th</sup> 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

Burrillville Invenergy EFSB-Data Requests Set 17

### STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS ENERGY FACILITY SITING BOARD

IN RE: INVENERGY THERMAL DEVELOPMENT LLC's

APPLICATION TO CONSTRUCTION THE : DOCKET No. SB-2015-06

CLEAR RIVER ENERGY CENTER IN
BURRILLVILLE, RHODE ISLAND

## THE TOWN OF BURRILLVILLE'S 17<sup>th</sup> SET OF DATA REQUESTS TO INVENERGY THERMAL DEVELOPMENT LLC

- 17-1 Is there any possibility, no matter how small, that there could be an explosion at the Spectra/Algonquin compressor station which could cause an explosion at the Invenergy plant? If it is your opinion that this is impossible, please explain. If it is your opinion that it is in any way possible, please explain the conditions under which this could occur, the likelihood of this occurring and your reasoning. Also, if this is possible, no matter how unlikely, please calculate the size of the blast area that would be affected by such an explosion.
- 17-2 Is it at all possible that a problem at the Invenergy plant could cause an explosion at the Spectra/Algonquin compressor station? If it is your opinion that this is impossible, please explain. If it is your opinion that it is in any way possible, please explain the conditions under which this could occur, the likelihood of this occurring and your reasoning. Also, if this is possible, no matter how unlikely, please calculate the size of the blast area that would be affected by such an explosion.
- 17-3 Please explain/calculate the probability of a certain blast events occurring, including the Algonquin Station exploding, the hydrogen storage tubes or generator igniting, and/or the proposed CREC facility itself exploding.
- 17-4 Please conduct an ALOHA (Area Locations of Hazardous Atmospheres ("ALOHA") Model developed by the EPA and the National Oceanic and Atmospheric Administration) analysis to determine the extent of the impact area of any possible explosion at the Invenergy facility and/or the Spectra/Algonquin facility, no matter how remote the possibility.

#### Respectfully submitted, Town of Burrillville By its attorneys

Oleg Nikolyszyn, Es

Town Solicitor

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Date: September 16, 2016

### **CERTIFICATE OF SERVICE**

I hereby certify that on the 16<sup>th</sup> day of September, 2016, I sent a copy of the foregoing to the attached service list.

Theresa Gallo

Burrillville Invenergy EFSB Data Requests Set 16

SB-2015-06 Invenergy CREC Service List as of 08/26/2016

Name/Address	E-mail	Phone/FAX
File an original and 10 copies with EFSB:	Todd.Bianco@puc.ri.gov;	401-780-2106
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