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April 12, 2016

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

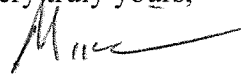
Re: Invenergy Thermal Development LLC – Clear River Energy Center
Docket No. SB-2015-06

Dear Mr. Bianco:

Enclosed for filing in this matter are an original and 10 copies of the Town of Burrillville's 4th Set of Data Requests to Invenergy Thermal Development LLC. Electronic copies have been sent to the service list.

If you need any further information, please do not hesitate to contact me.

Very truly yours,



Michael R. McElroy

MRMc:tmg

cc: Service List

SB-2015-06 Invenergy CREC Service List as of 03/10/2016

Name/Address	E-mail	Phone/FAX
<p>File an original and 10 copies with EFSB: Todd Bianco, Coordinator Energy Facility Siting Board 89 Jefferson Boulevard Warwick, RI 02888</p> <p>Margaret Curran, Chairperson Janet Coit, Board Member Assoc. Dir., Div. of Planning c/o Kim Crabill Patti Lucarelli Esq., Board Counsel Susan Forcier Esq., Counsel Rayna Maguire, Asst. to the Director DEM</p>	<p>Todd.Bianco@puc.ri.gov; Patricia.lucarelli@puc.ri.gov; Margaret.Curran@puc.ri.gov; janet.coit@dem.ri.gov; kimberly.Crabill@doa.ri.gov; susan.forcier@dem.ri.gov; rayna.maguire@dem.ri.gov;</p>	<p>401-780-2106</p>
<p>Parties (Electronic Service Only, Unless by Request)</p>		
<p>Invenergy Thermal Development LLC Alan Shoer, Esq. Richard Beretta, Esq. Elizabeth Noonan, Esq. Nicole Verdi, Esq. Adler, Pollock & Sheehan One Citizens Plaza, 8th Floor Providence, RI 02903</p>	<p>ashoer@apslaw.com; rberetta@apslaw.com; enoonan@apslaw.com; nverdi@apslaw.com;</p>	<p>401-274-7200</p>
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	Christopher.Kearns@energy.ri.gov ;	
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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 4th SET OF DATA REQUESTS TO
INVENERGY THERMAL DEVELOPMENT LLC**

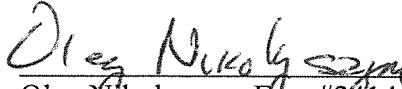
- 4-1 How much cut and fill of earthen material will be involved in this project?
- 4-2 How much existing material is reusable on site, how much material must be trucked off site, and how much material will need to be brought onto the site?
- 4-3 How many trucks will be traveling Town roads during construction of this project?
- 4-4 Is this a project where concrete foundations will be required to be done in a constant pour? If so, what are the volumes? (A constant pour means that trucks will be dumping and then returning to the concrete plant at a rate of one truck each way every twenty minutes on an average. As an example, utilizing a fleet of fifteen yard concrete trucks and a constant pour of 1,000 yards would consist of 66 truck trips both coming and going every twenty minutes. This 1,000 yard pour would be for a continuous period of 22 hours non-stop of trucks traveling through the village of Pascoag and along Wallum Lake Road which consists of a residential area.) How many times is this going to happen during the two separate proposed construction phases?
- 4-5 Has Invenergy considered bringing a portable cement manufacturing plant onto the site to resolve the problem of trucking through the area? If not, why not?
- 4-6 The plans that were incorporated into the package consist of five sheets with no details. Please provide fully detailed plans.
- 4-7 What is the volume of ammonia to be stored? What is the concentration level of the ammonia? What are the security plans and evacuation plans and procedures?
- 4-8 What is the volume of diesel fuel to be stored? Is this the volume required for the amount of time that the plant will be allowed to run on diesel fuel? Can the storage volume be reduced with trucking to the site in instances when the diesel is to be used? If not, why not?
- 4-9 It appears that the site slopes upward from Wallum Lake Road at an approximate elevation of 560 towards the area of development to a high point elevation of 580 at the approximate center of the area of development and then down to the western most edge of the development at the edge of the wetland buffer. Is this correct?

- 4-10 It appears that access to the site requires three separate wetland crossings and the perimeter of much of the site abuts directly to the wetland buffers. Is this correct?
- 4-11 Will independent environmental compliance monitoring be active on the site during construction hours throughout the construction process? Please explain in detail.
- 4-12 It appears that storm water detention pound #1 is located within a limited upland area surrounded by wetlands. Is this correct? It appears that this location could cause damage to the surrounding wetlands. Could the detention pond be relocated to a more suitable location? If not, why not?
- 4-13 It appears that the site entrance at Wallum Lake Road is down gradient of the project. Is this correct? Could additional storm water storage be required at the entrance to prevent storm water flows from being increased onto Wallum Lake Road?
- 4-14 It appears that the “construction laydown” area abuts against wetland buffers. Is this correct? Exactly what is going to be stored within this area? Please explain in detail your proposal for protection of the wetlands in this area, considering the materials being stored.
- 4-15 The site appears to be creating a large amount of impervious space. Is this correct? Please explain the site’s storm water management plan. Has a storm water report been done? If so, please provide a copy. Will the detention basins handle a one hundred year storm event? Is the site going to comply with best management practices?
- 4-16 It appears that the set of plans includes nothing about waste water being transported off of the site by means of a sewer ejection force main line to a point of gravity flow (somewhere in the village of Pascoag) to the Town of Burrillville Sewage Treatment Plant. It appears that this waste water is going to have more concentrated amounts of contaminates than what is pumped out of the ground from the existing contaminated aquifer. Is this correct? This contaminated wastewater will run through the Town of Burrillville Sewer Lines. What is being done to insure that the wastewater will not leach into the soils surrounding the lines that it flows through?
- 4-17 Does the Burrillville Sewage Treatment Plant have the technology to properly treat this waste water or is it going to be dumping contaminates into the river? If it will be dumping without treatment, will this further contaminate the land all the way to Narragansett Bay? Please explain.
- 4-18 Will Invenenergy agree to install a waste water pretreatment plant of its own? If not, why not?
- 4-19 What is the quality of the water post condensers and pre-discharge into the system?

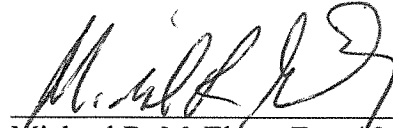
- 4-20 What, if any, treatment of the discharged water will be required prior to releasing the water back into the environment?
- 4-21 What is the method of replenishment of the aquifer?
- 4-22 It appears that the discharge of the used water to the waste water treatment facility will remove the water from the aquifer cycle and then after treatment by the sewer plant send it down stream on the other side of town. Is this correct?
- 4-23 If the used water is clean and can be introduced back into the stream and local ponds, could Invenenergy build a dam to provide adequate time for the water to percolate through to Pascoag aquifer and complete the circle allowing a flushing action to assist in the removal of the existing contaminates? If not, why not?
- 4-24 What polluting materials are expected to be maintained on hand at the facility? Are there Material Safety Data Sheets available for these items? If so, please provide them.
- 4-25 What is the capacity and structure of the retaining dike around the fuel tanks?
- 4-26 What Hazmat capabilities will be in place at the plant?
- 4-27 At production, will a constant replenishment of the bump strip be necessary?
- 4-28 With Invenenergy being committed to renewable power production, would Invenenergy be willing to repair existing dams and construct a mini power producing facility utilizing a water wheel versus a water turbine so as to maintain the cultural heritage of the town? (Burrillville is an old mill town and water wheel power was the mainstay of its founding.)
- 4-29 Both solar and wind power production are variable or of limited production use. However, the streams flow 24 hours per day and only slow down during the dry season. The old water wheel system was strong enough to power a full size textile mill. A water wheel should be able to turn a 15 to 20 Kw generator. Do you agree?
- 4-30 Is there available sound generating equipment or a machine that can demonstrate the 45 decibel sound level?
- 4-31 Will the pumping or compressor stations on the pipe line have a condensate knock out system that separates the condensate from the gas? If not, why not?
- 4-32 Will the plant itself have a knock out system? If not, why not?
- 4-33 What will happen to any of the condensates that are separated from the gas? Please explain.
- 4-34 Will the condensate be treated at the plant or returned to the gas pumping station in double walled pipe systems? Please explain.

- 4-35 Were any other towns investigated as locations to build the plant? Please explain.
- 4-36 Are there any other “Brown” areas in the state that could accommodate the plant?
- 4-37 Please explain your proposal for what will be done if the plant is in violation of Town Ordinances, especially as it relates to noise, water, air, and property devaluation.
- 4-38 Please provide the contingency plans for catastrophic or emergency events.
- 4-39 Please provide the disaster recovery plans.
- 4-40 During construction, will travel on truck routes or to abutting homes be restricted during certain times of day?
- 4-41 What can the company do, or has it done in the past in regards to its energy projects, to mitigate noise, sight, and air disturbances?
- 4-42 What, if any, community based programs has the company instituted regarding energy use/consumption/incentives to mitigate local impacts?
- 4-43 Has the company extended solar or wind applications to public areas such as schools or other municipal buildings to mitigate local impacts?
- 4-44 Please explain the air pollutant trading allowance program generally. Explain the cost of allowances, amount paid by Invenergy and the amount of pollution being purchased above regulatory limits. Please explain this for each pollutant type. Please explain what is the flow of the money for such purchases (i.e., does it get deposited to a State or Federal Agency or traded to another project in the U.S.)?
- 4-45 You state that H-rated General Electric engines are the highest efficiency in the Nation. Does that mean they are the best in terms of air quality? Do other engines exist that burn cleaner?
- 4-46 What has been Ocean State Power’s air emissions, by pollutant type as reported to the EPA, over the past ten years and how does that compare to what Invenergy projects for the Clear River Energy Center during its first ten years of operation?

Respectfully submitted,
Town of Burrillville
By its attorneys



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Date: April 12, 2016

CERTIFICATE OF SERVICE

I hereby certify that on the 12th day of April, 2016, I sent a copy of the foregoing to the attached service list.


Theresa Gallo

Burrillville Invenegy-EFSB Data Requests Set 3