

# Schacht & McElroy

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April 29, 2016

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

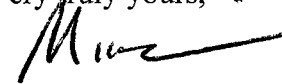
Re: Invenergy Thermal Development LLC – Clear River Energy Center  
Docket No. SB-2015-06

Dear Mr. Bianco:

Enclosed for filing in this matter are an original and 10 copies of the Town of Burrillville's 8<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

STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS  
ENERGY FACILITY SITING BOARD

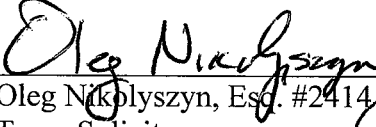
IN RE: INVENERGY THERMAL DEVELOPMENT LLC's :  
APPLICATION TO CONSTRUCTION THE : DOCKET No. SB-2015-06  
CLEAR RIVER ENERGY CENTER IN :  
BURRILLVILLE, RHODE ISLAND :

**THE TOWN OF BURRILLVILLE'S 8<sup>th</sup> SET OF DATA REQUESTS TO  
INVENERGY THERMAL DEVELOPMENT LLC**

- 8-1 GAC Treatment following Extraction at the Pascoag Well – The proposed granular activated carbon (GAC) treatment system needs to be evaluated. In Table 6.2-2 of the October 2015 application, the proposed MTBE concentration going to the proposed plant is 55 µg/L, and following use at the plant as cooling water, the compositional projection of MTBE going to the Burrillville WWTP is 200 µg/L. Please provide a process and instrumentation diagram for the proposed GAC treatment system.
- 8-2 Compositional Analysis of Wastewater Streams – Page 46 of the October 2015 application states that wastewater from the plant will be from four primary sources - wastewater from the high purity water treatment processes (reverse osmosis and EDI systems), blowdown from the steam generator (HRSG) needed to control chemistry in the stream generator, blowdown from the evaporative coolers used to control chemistry (summer use only) and sanitary wastewater from the operating staff. In Table 6.2-2 of the October 2015 application, it seems that the application may be combining the 3 types of process water (WW from high purity water treatment, and the two blowdown sources) into a single process water stream. Please provide a compositional analysis for all of the waste streams that may be discharged from the proposed plant to the Burrillville WWTP.
- 8-3 Section 1.6(b)(20) of the RIEFSB Rules states that the applicant must file all necessary NEPA environmental documentation. The October 2015 application does not contain any NEPA documents. Please explain/clarify.
- 8-4 NEPA as defined by CEQ may not have been adequately addressed in the ESS application for CERC. Specifically, it appears that the analysis of alternatives for the project have not been clearly analyzed and compared to the preferred alternative. Please explain/clarify.
- 8-5 Should other federal agencies be listed as involved, especially FERC, as FERC is part of the Forward Capacity Market/Auction which seems to be one of the major driving forces for the construction timeline of this facility? Please explain/clarify.
- 8-6 It appears that the project has been segmented, is that correct? Do you agree that the entire build out of the project needs to be considered? Please explain/clarify.

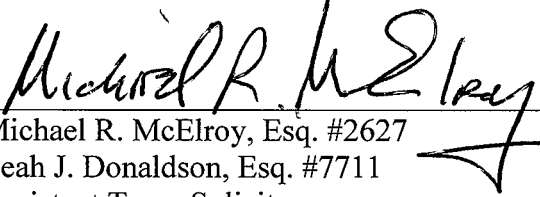
- 8-7 Under NEPA – Environmental Justice must be addressed. We have found no references to environmental justice in the documents. Please explain/clarify.
- 8-8 Under NEPA – Socioeconomic impacts and analysis - this section does not seem to be clearly identified. Please explain/clarify.
- 8-9 Cumulative impacts – under NEPA, cumulative impacts need to be addressed. This includes items like “Offsite Storage.” Those areas need to be included in the full analysis of this document. Please explain/clarify.
- 8-10 It appears that wetland mitigation and planning may not have been incorporated into the document. Please explain/clarify.
- 8-11 It appears that wetland descriptions may not have been accurately made within the vegetation section of the document. Please explain/clarify.
- 8-12 It appears that there is no mention of the perennial stream associated with the wetlands. Please explain/clarify.
- 8-13 It appears that there is no mention of sensitive natural areas such as vernal pools. Please explain/clarify.
- 8-14 It appears that no flood storage compensation has been included if wetland/stream areas/flood plains are being impacted. Please explain/clarify.
- 8-15 Under the alternatives section – it appears that there is a cut and paste from another document which has nothing to do with Rhode Island nor species of concern in Rhode island. Please explain/clarify.

Respectfully submitted,  
Town of Burrillville  
By its attorneys

  
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Date: April 29, 2016

**CERTIFICATE OF SERVICE**

I hereby certify that on the 29<sup>th</sup> day of April, 2016, I sent a copy of the foregoing to the attached service list.

  
Theresa Gallo

*Burrillville/Invenegy/EFSB/Data Requests Set 8*

**SB-2015-06 Invenenergy CREC Service List as of 04/18/2016**

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