



NTE Connecticut, LLC

24 Cathedral Place, Suite 600
St. Augustine, FL 32084
P: 904.687.1857
F: 866.861.3220
www.nteenergy.com

September 30, 2019

Melanie A. Bachman, Esq.
Executive Director and Staff Attorney
Connecticut Siting Council
Ten Franklin Square
New Britain, Connecticut 06051

RE: **DOCKET NO. 470B** – NTE Connecticut, LLC Certificate of Environmental Compatibility and Public Need for the construction, maintenance and operation of a 650-megawatt dual-fuel combined cycle electric generating facility and associated electrical interconnection switchyard located at 180 and 189 Lake Road, Killingly, Connecticut. **Development and Management Plan – Phase I.**

Dear Attorney Bachmann:

At a public meeting of the Connecticut Siting Council (Council) held on September 12, 2019, the Council considered and approved the partial Development and Management Plan – Phase I (Phase I D&M Plan) submitted for this project specific to site clearing and other site preparation work **with the exception** of the “Appendix D – Erosion and Sedimentation Control Plan (E&S Control Plan)”. As a part of its approval, the Council ordered that revisions to Appendix D be made so that so that the proposal complied with the 2002 Connecticut Guidelines for Soil Erosion and Sediment Control (2002 Guidelines). Revisions were to be resubmitted to the Council for its review and approval.

NTE Connecticut, LLC (NTE) has carefully reviewed the Council’s comments and input related to the E&S Control Plan, and in coordination with its EPC contractor (Burns & McDonnell), hereby submits two attachments which incorporate the Council’s requested changes and additions and to demonstrates the Phase 1 D&M Plan’s compliance with the 2002 Guidelines. More specifically:

Attachment A: Soil Mechanics Analysis Calculation

Attachment B: Revised E&S Control Plans

The Council’s comments (a), (b) and (c) relate to the 2H:1V slopes that surround the facility and outline requirements of the 2002 Guidelines for slopes steeper than 3:1 that exceed 15 feet in vertical height. Specifically, the 2002 Guidelines state “Reverse slope benches are required whenever the vertical height of any slope steeper than 3:1 exceeds 15 feet, except when engineered slope stabilization structures measures are included in the slope and/or a detailed soil mechanics analysis calculation has been confirmed an acceptable factor of safety exists for the finished slope”. **Attachment A** to this letter contains the detailed Soil Mechanics Analysis Calculation that demonstrates an acceptable factor of safety for the 2H:1V slopes included in the Phase 1 D&M Plan.

The Council’s comments (d), (e), (f), (g), and (i) consist of several requested improvements to the erosion and sedimentation control design that NTE and Burns & McDonnell have incorporated into the Phase 1 D&M Plan. These changes are reflected in the Revised E&S Control Plan contained in **Attachment B** to this letter. The improvements shown in **Attachment B** that were made are summarized below:

Reliable, efficient power for a cleaner America

Response to Council comment (d): Additional measures (specifically hay bales and straw wattles) in the areas identified in the comments as discussed below have been incorporated into the revised E&S Control Plan design. Straw wattles will also be installed along all 2H:1V slopes in addition to the turf reinforcement mat.

Response to Council comment (e): Straw wattles have been added at the toe of the slopes in addition to along the 2H:1V slopes. The filter fabric fence and hay bale barrier were retained for additional protection.

Response to Council comment (f): Straw wattles have been added at the toe of the slopes which blend directly into stormwater basins.

Response to Council comment (g): A row of hay bales have been added along the top slope at the southern end of the property. Straw wattles have been added at the toe of the slope in addition to along the 2H:1V vertical slopes in this area of the property.

Response to Council comment (i): The stone dike dam shown between TST-3A and TST-3B has been removed and a weir structure added to TST-3A. These basins will act as separate sediment traps during construction.

The Council's comments (h), (j), (k), and (l) identify several requested improvements and/or corrections to the erosion and sedimentation notes and details sections. NTE and Burns & McDonnell have incorporated these recommended improvements in the Phase 1 D&M Plan. These changes are also reflected in the Revised E&S Control Plan contained in **Attachment B** to this letter. The improvements that were made are summarized below:

Response to Council comment (h): A "Straw Wattles" section(s) has been added in both the notes and details sections of the E&S Control Plan. Language has been added to Note #7 of the construction sequence section that stumps are to be removed from the site. Paving is not part of the Phase I D&M Plan and those details will be provided in a later phase of the D&M Plan. There are no septic systems on site. These references have been removed from CG330.

Response to Council comment (j): The date in Note #10 pertaining to Hydrodynamic separators has been updated to October 2015.

Response to Council comment (k): Catch basins were not included in the Phase I D&M Plan and those details will be provided in a later phase of the D&M Plan once the catch basin locations are finalized. Catch basins will have minimum 4' deep sumps.

Response to Council comment (l): A maintenance section for turf reinforcement mats has been added to the notes section of the E&S Control Plan.

Additionally, the Council recommended that the Certificate Holder makes arrangements to obtain pre-blasting surveys of nearby residences and that the emergency contact information for CT EPA in the Emergency Response Action and Fire Prevention Plan (ERAFPP) be changed to CTDEEP. NTE commits that pre-blast

surveys of nearby residences will be performed prior to any blasting on-site and that the contact information in the ERAFPP will be modified accordingly.

Sincerely,

A handwritten signature in black ink, appearing to read "T Eves". The signature is fluid and cursive, with the first letters of the first and last names being capitalized and prominent.

Timothy Eves
SVP – Development
NTE Connecticut, LLC