

Mr. Toma,

I find unacceptable your response to my request under the Freedom of Information Act for data relative to the operation of the sewage sludge gasification pilot plant of the WPCA. I quote from that act:

Sec. 1-210. (Formerly Sec. 1-19). Access to public records. Exempt records. (a) Except as otherwise provided by any federal law or state statute, all records maintained or kept on file by any public agency, whether or not such records are required by any law or by any rule or regulation, shall be public records and every person shall have the right to inspect such records promptly during regular office or business hours or to receive a copy of such records in accordance with the provisions of section 1-212.

The law states that "... every person shall have the right to inspect such records promptly ..."

Following is the information that I requested on April 10, 2009:

"Access to any information held on a computer or in print format that relates to data the WPCA has obtained regarding the operation of the Stamford Bio-Gas pilot plant including:: ASTM and other test data relating to the analysis of the feed material, product synthesis gas produced and ash from the reactor; flow rates of the various streams such as dry sludge feed rate, synthesis gas flow, air flow to the reactor, and ash discharge rate; temperatures and pressures in the reactor and at critical points in the process; electrical power output and power consumed in the pilot plant operation; and any other relevant data pertaining to the pilot plant operation. All such data should be from the latest operation of the pilot plant under steady flow conditions."

The requested information required neither new tests in the laboratory nor new runs in the pilot plant. What I was seeking was data that was already available either in the laboratory logs or the pilot plant operators' charts or records. Universally accepted process development practices require that such records be maintained on a real-time basis, or at least be completed daily. This previously recorded data could have been copied quickly by WPCA personnel or I could come to the WPCA office to look at the records and copy them myself.

I have requested other information from Jeanette Brown and Benjamin Barnes without recourse to the Freedom of Information Act but I have received only one document, the chemical analysis of the dried sludge. The response to other requests was either silence or in one case Ms. Brown said that she would submit a detailed report that would have all of the information in two weeks. I am awaiting completion of that report but I recently read that Ms. Brown has prepared a feasibility study which requires final cost figures that will be available in mid-May. The dates for receipt of information from the Stamford WPCA keep moving forward.

My request for this information was based on my observation of several decisions of the WPCA which I thought were ill-advised:

1. The decision to design and operate a chemical pilot plant when the WPCA had no experience in the design or operation of chemical processes. As a result, much money has been wasted on a pilot plant whose technology will not be used in the proposed full-scale plant according to a personal communication with Jeanette Brown, Executive Director of the WPCA. Instead, this technology will probably be licensed from abroad. As far as I know, the pilot plant continues to be operated with additional expenses being incurred daily by the City of Stamford.

2. The decision to design, build and operate a sewage sludge drying and pelletizing plant, which is costing the City much more than what it would have cost to simply have the sewage sludge hauled away. The WPCA continues to pay a contractor to operator this facility even though there is no apparent reason for its continued operation. If it was intended that the

dryer provide sewage sludge feed to the gasification plant, it should have been a part of the appropriation request for both the dryer and gasification plants as one unit. The sludge dryer plant should not have been built until the appropriation for the entire project had been approved by the appropriate City boards.

3. The decision to request authorization of an appropriation of \$20,000,000 to build the full-scale sewage sludge gasification plant without a feasibility study. A feasibility study should have determined if the proposed technology had been proven in either a commercial scale plant or in a continuously-operated demonstration plant. In addition, the feasibility study should have shown if the operation of the full-scale plant would be a profitable venture for the City of Stamford. This request for funds was ultimately withdrawn after many citizens protested because of the lack of a feasibility report.

4. The decision to start design of the full-scale plant before the technology had been selected and before money had been authorized for implementation of the sewage sludge gasification project. What will happen to that design effort if the project is ultimately rejected by the Boards of Finance and Representatives?

Because of these decisions, which, in my opinion, were unwise and which have cost Stamford taxpayers millions of dollars, I have tried to obtain information about the WPCA operations. As a retired chemical engineer with many years of experience in the supervision of design and construction of hundreds of chemical plants, I believe that I am capable of assessing the activities of the WPCA relative to the sewage sludge gasification project and I object to the continued delays in supplying information which is readily at hand in the WPCA files.

I urge you to advise Ms. Brown to supply the information requested promptly as required by the State of Connecticut Statutes.

Louis Basel
Citizen and taxpayer of Stamford for 50 years

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From: [Toma, Michael](#)
To: loubas@optonline.net
Cc: [Brown, Jeanette](#) ; [Barnes, Benjamin](#)
Sent: Wednesday, April 15, 2009 5:38 PM
Subject: FOI Request

Mr. Basel:

The WPCA has received your FOI request, and intends to compile all responsive records and make them available for your inspection at the WPCA offices. As it is anticipated that many documents will need to be gathered, it will take some time to complete the search. The WPCA is targeting May 6 for completion of the compilation process. The WPCA will send you an email notifying you when the records are ready for your inspection.

Michael S. Toma
Assistant Corporation Counsel
City of Stamford