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June 4, 2021

Via Electronic Filing

Melanie Bachman, Executive Director/Staff Attorney
Connecticut Siting Council
10 Franklin Square
New Britain, CT 06051

Re: C-Tec Solar, LLC – Petition 1451 - Petition for a Declaratory Ruling that no Certificate of Environmental Compatibility and Public Need Is Required for the Proposed Construction, Maintenance and Operation of Two Solar-Based Electric Generating Facilities, with Respective Outputs of 3.8 MW and 2.2 MW, to be Located at 277 Sadds Mill Road, Ellington, Connecticut

Dear Ms. Bachman:

I am writing on behalf of my client, C-Tec Solar, LLC, in connection with the above-referenced Petition. With this letter, I am submitting C-Tec’s responses to the Council’s Interrogatories, dated May 14, 2021.

Should you have any questions concerning this submittal, please contact me at your convenience. I certify that copies of this submittal have been submitted electronically to any parties on the Council’s service list for this Petition.

Sincerely,

Lee D. Hoffman

Enclosures

**STATE OF CONNECTICUT
CONNECTICUT SITING COUNCIL**

C-Tec Solar, LLC Petition for a Declaratory Ruling, pursuant to Connecticut General Statutes §4-176 and §16-50k, for the proposed construction, maintenance and operation of a 3.8-megawatt AC solar photovoltaic electric generating facility and a 2.2- megawatt AC solar photovoltaic electric generating facility located at 277 Sadds Mill Road, Ellington, Connecticut, and associated electrical interconnection.

Petition No. 1451

June 4, 2021

**C-TEC SOLAR, LLC'S RESPONSES TO THE CONNECTICUT SITING COUNCIL'S
(MAY 14, 2021) INTERROGATORIES**

The petitioner, C-Tec Solar, LLC (“C-Tec” or “the Petitioner”), respectfully submits this response to the Council’s Interrogatories, dated May 14, 2021, in the above-referenced Petition. In response to the Council’s Interrogatories, C-Tec states as follows:

Project Development

- 1. Referencing Petition p. 6, summarize the feedback that the Petitioner received from the abutters. How were their concerns addressed?**

To date, C-Tec has only received one communication from any abutter. That individual had questions regarding where on the property the facility would be located. The individual also expressed a desire to discuss siting additional solar projects on their property. No concerns were raised, so no concerns needed to be addressed.

- 2. Please submit a map clearly depicting the boundaries of the solar project site and the boundaries of the host parcel(s). Under RCSA §16-50j-2a(29), “Site” means a contiguous parcel of property with specified boundaries, including, but not limited to, the leased area, right-of-way, access and easements on which a facility and associated equipment is located, shall be located or is proposed to be located.**

Please refer to Appendix A (“Project Plans”) to the Petition; OP-1 “General Site Plan” depicts both the boundaries of the solar project site and the boundaries of the host parcel(s).

3. **Referencing Petition pp. 6-7, provide more information as to how the Petitioner developed the following Projects:**

- **Board of Education (Bloomfield, CT) – 2MW**
- **Voluntown Road (Griswold, CT) – 2.4MW**
- **Bilton Road (Somers, CT) – 3.6MW**

Does C-Tec currently own and operate these facilities? If so, how were they permitted, when were they acquired and by what processes?

- **Board of Education (Bloomfield, CT)** – This project is 2 MW in the aggregate, however, this facility is really an amalgamation of several, smaller facilities. The total of all of the facilities comprises approximately 5882 panels and 27 inverters. This was the first project under Connecticut’s Shared Clean Energy Facility Pilot Program. The project allowed Connecticut residents, governments, and businesses to choose community solar energy for the first time. The project was built over several parcels; each of which was less than one (1) MW; the project was then subsequently sold to Ameresco. Photos of the project are accessible at <https://www.ctecsolar.com/bloomfield-board-of-education/>.
- **Voluntown Road (Griswold, CT)** – This project is a 2.4 MW virtual net metering facility that provides power to municipalities throughout Connecticut. The facility is comprised of approximately 6000 panels and twelve (12) inverters. C-Tec Solar was the EPC contractor for the project. The Siting Council approved the construction of the facility through Petition No. 1220. Please refer to that petition for additional information. Photographs and additional information concerning the Voluntown Road facility are accessible at <https://www.ctecsolar.com/voluntown-road/>.
- **Bilton Road (Somers, CT)** – This is a virtual net metering 3.6 MW facility that provides power to municipalities throughout Connecticut. The facility has approximately 9000 panels and eighteen (18) inverters. C-Tec served as the EPC for the project. The Siting Council approved the petition for the facility through Petition No. 1323. Please refer to Petition No. 1323 for additional information regarding the facility.

As indicated above, C-Tec does not currently own the Bloomfield project, and C-Tec served as the EPC contractor for the other two projects listed above. The various facilities that comprise the Bloomfield project were approved through local approval processes, and the Council approved the other two projects in Petition 1220 and 1323.

4. **If the project is approved, identify all permits necessary for construction and operation and which entity will hold the permit(s)?**

If the Project is approved, C-Tec anticipates that the following permits will be required for its construction and operation:

- a. Connecticut Department of Energy and Environmental Protection (“CTDEEP”), General Permit for the Discharge of Stormwater and Dewatering Wastewater from Construction Activity (“General Permit”).
- b. Town of Ellington, Building Permit.
- c. Town of Ellington, Electrical Permit.

5. Was the project selected through a RFP process? If so, which RFP?

No, the Project was not selected through an RFP process.

6. Was the project selected for the LREC/ZREC Program?

Yes, the Project was selected for the LREC/ZREC Program.

7. Is the project subject to a virtual net metering agreement? If so, provide details of the agreement.

Yes; two thirds of the Project is subject to a virtual net metering (“VNM”) agreement. It is anticipated that the remaining third of the project will eventually be subject to a VNM agreement. If not, that portion of the project could be constructed and subject to market rates.

The VNM agreement has been made with Eversource through the “agricultural queue,” and was accepted into the agricultural queue on December 9, 2019. The VNM Agreement was completed on February 28, 2020, and it is based on an annual production of approximately 3,378,000 kWh.

8. Does the Petitioner have a contract to sell the electricity and renewable energy certificates (RECs) it expects to generate with the proposed project? If so, to which public utility? If the electricity is to be sold to more than one public utility, provide the percentage to be sold to each public utility.

Yes, C-Tec currently has two (2) LREC contracts for the Project with The Connecticut Light & Power Company d/b/a Eversource Energy (“Eversource”). Those contracts were entered into on July 26, 2019 and are contract numbers LREC8-6294 and LREC8-6295. The project also hopes to be awarded two (2) ZREC contracts.

9. What authority approves the power purchase agreement (PPA) for the facility? Has a PPA with an electric distribution company been executed? If so, at what alternating current megawatt output? If not, when would the PPA be finalized?

No, a PPA with an electric distribution company has not been executed. C-Tec currently has both a VNM contract and an LREC contract, neither of which require regulatory approval.

10. What is the length of the power purchase agreement (PPA)? Are there provisions for any extension of time in the PPA? Is there an option to renew?

The length of each LREC contract is fifteen years; there is no option to renew.

- 11. Is the alternating current megawatt capacity of the facility fixed at a certain amount per the PPA and/or the RFP? Is there an option within the PPA to allow for changes in the total output of the facility based on unforeseen circumstances?**

Each LREC contract is based on an installed capacity of 2,000 kW AC. There is an option within the LREC to allow for changes in the total output of the facility based on unforeseen circumstances.

- 12. If the PPA expires and is not renewed and the solar facility has not reached the end of its lifespan, will the Petitioner decommission the facility or seek other revenue mechanisms for the power produced by the facility?**

In such event, the Petitioner anticipates that it would seek other revenue mechanisms for the power produced by the facility. The Petitioner currently anticipates that it would participate in the market, however, it is unsure, at this time, as to exactly how such markets would work.

- 13. Does the Petitioner intend to participate in future ISO-NE Forward Capacity Auctions? If yes, which auction(s) and capacity commitment period(s)?**

At this time, the Petitioner is evaluating whether it makes sense for the Petitioner to participate in ISO-NE's Forward Capacity Auctions, or whether it will participate in ISO-NE's Forward Capacity Market in some other capacity. Currently, the project has not committed to any auctions or capacity commitment periods.

- 14. What is the length of the project site lease?**

C-Tec has not yet finalized the lease agreement with the landowner, as C-Tec is presently under the option development period that the parties negotiated. However, the term of the lease has been articulated in the option agreement. The initial term of the project site lease will be twenty (20) years. The lease will also provide C-Tec with two (2), five (5)-year options to extend. Therefore, the length of the project site lease (when accounting for the extension options) is thirty (30) years.

Proposed Site

- 15. Referring to Petition p. 14, approximately how many acres of the project site are in each land use zone?**

The Project Site is located in two (2) different zones within Ellington; the Industrial ("I") zone and the Rural Agricultural Residential ("RAR") zone. The majority of the Site, including the entirety of the Facility, is located within the Industrial (I) zone, which consists of approximately 141 acres. The remaining portions of the Site, approximately 16 acres, is zoned Rural Agricultural Residential (RAR).

16. **Referring to Petition p. 18, approximately how many acres of the project site are located within the previously logged area?**

Approximately 16.9 acres of the Project Site are located within the previously logged area.

17. **Would construction, maintenance and operation of the solar facility interfere with the property owner's continued logging operations or other agricultural activities that are currently conducted on the host parcel? Explain.**

No, due to the strategic siting of the solar facility, the facility's construction, maintenance and operation will not interfere with the property owner's continued logging operations or other agricultural activities that are currently conducted on the host parcel.

18. **Is the site parcel, or any portion thereof, part of the Public Act 490 Program? If so, how does the municipal land use code classify the parcel(s)? How would the project affect the use classification?**

Yes, both parcels that comprise the site are part of the Public Act 490 Program; the 277 Sadds Mill Road parcel is Woodlands and the Reeves Road parcel is Forestland. The underlying municipal land use code of the site is Industrial ("I") zone. The Project would not affect the municipal use classification of the site, as ground mounted solar is an approved use within an I-zone in Ellington. However, it is anticipated that the portion of the site parcel that contains the facility would not longer be part of the Public Act 490 Program.

19. **Has the State of Connecticut Department of Agriculture purchased any development rights for the project site or any portion of the project site as part of the State Program for the Preservation of Agricultural Land?**

No, the State of Connecticut Department of Agriculture has not purchased any development rights for the project site, nor is any portion of the project site part of the State Program for the Preservation of Agricultural Land.

Energy Output

20. **Referring to Petition p. 10, the proposed solar panels would be 480 Watts each. Is that wattage based on the front side of the panel only?**

Yes, the 480-wattage figure is based on the front side of the panel only.

21. **Have electrical loss assumptions been factored into the output of the facility? What is the output (MW AC) at the point of interconnection?**

Yes, electrical loss assumptions have been factored into the output of the facility. The output of the facility is six (6) MW at the point of interconnection.

- 22. Referring to Petition p. 7, does C-Tec anticipate installing a battery storage system at the site? If so, would there be sufficient space within the site lease area for such a system? What impact would a battery system have on any RFP or PPA?**

Yes, C-Tec has designed the facility to be able to install a battery storage system at the site, as there is sufficient space within the site lease area to accommodate such a system. C-Tec cannot ascertain what impact a battery system would have on any RFP or PPA since the State of Connecticut has not yet issued any RFPs or PPAs for battery storage systems. However, C-Tec has designed its project with sufficient flexibility to allow for a battery storage system in the future.

- 23. Could the project be designed to serve as a microgrid?**

No, the Project, in its current iteration, is not designed to serve as a microgrid. Microgrid functionality would require the Project to have an energy storage component, or local connected load and dispatch capabilities, which are not currently included in the Project's design. In addition, there is no local load in the area which would benefit from the operation of a microgrid.

- 24. Do solar facilities present a challenge for the independent system operator for balancing loads and generation (to maintain the system frequency) due to the changing (but not controlled) megawatt output of a solar facility? What technology or operational protocols could be employed to mitigate any challenges?**

C-Tec objects to this Interrogatory to the extent that it is beyond the scope of a Petition for Declaratory Ruling pursuant to Connecticut General Statutes §4-176 and §16-50k. Subject to the foregoing objection, C-Tec states that it believes that intermittent resources, such as solar, present a slight challenge for the independent service operator ("ISO") with respect to its ability to balance the supply and demand of the energy markets, as intermittent generators do not have control over their respective net power output(s). Consequently, in circumstances of unanticipated production from intermittent resources (or lack thereof), the ISO (and the market incentives it has devised) must encourage production from other generators in times of scarcity and discourage production in times of abundance. C-Tec believes that the technology/operational protocols that could be employed to mitigate these challenges is to incorporate an energy storage component into the facilities' design. At this time, the most prevalent form of storage is lithium-ion battery energy storage systems ("BESS"). By increasing the deployment of BESSs and increasing the ISO's connectivity to those systems, the grid supply demand could be better balanced and the necessity for curtailment (and potential waste) is mitigated.

Site Components and Solar Equipment

- 25. Is the wiring from the panels to the inverters installed on the racking? If wiring is external, how would it be protected from potential damage from weather exposure, vegetation maintenance, or animals?**

Yes, the wiring from the panels to the inverters will be installed on the racking. The shading provided by both the racking and the modules would protect the wiring from potential damage. In areas where such shading is unavailable, C-Tec would utilize wire loom or electrical conduit to protect the respective wiring.

Interconnection

- 26. Where on the electrical interconnection route would the demarcation point (or location of change of control from the Petitioner to Eversource) be located?**

The demarcation point will be located at the fourth (4th) pole off of Sadds Mill Road, a maximum of 500 feet down the existing access road.

- 27. Why is the proposed facility characterized as a 2.2 MW facility and a 3.8 MW facility? Would the 2.2 MW and 3.8 MW solar arrays be separately metered and/or subject to separate contracts? Explain.**

The facilities have different size interconnections to match respective ZREC and/or VNM awards and applications. The Petitioner's intent is to build these facilities together; however, if additional VNM contracts or ZRECs are not awarded, C-Tec may phase the construction of the Project.

- 28. Is the project interconnection required to be reviewed by ISO-NE?**

Yes, the project interconnection for the facility is currently under review by ISO-NE.

- 29. Is the existing distribution system three-phase or would it have to be upgraded from single-phase to three-phase to accommodate the project?**

The existing distribution system is three-phase; therefore, no upgrades are required to accommodate the Project.

Public Safety

- 30. In the event of a brush or electrical fire, how would the Petitioner mitigate potential electric hazards that could be encountered by emergency response personnel? Could the entire facility be shut down and de-energized manually in the event of a fire? If so, how?**

Yes, in the event of a brush or electrical fire, there will be multiple disconnects available on the site that can de-energize the system manually. C-Tec is also prepared to provide hazard training for Ellington emergency responders in the event that such training is requested.

- 31. Does the Petitioner intend on conducting outreach and/or training for local emergency responders in the event of a fire or other emergency at the site?**

C-Tec will contact Ellington's emergency responders to provide such outreach and/or training for Ellington emergency responders to ascertain that such outreach/training is desired. Assuming the training is desired, C-Tec will provide that training to Ellington's emergency responders.

32. Are there any wells on the site or in the vicinity of the site? If so, how would the petitioner protect the wells and/or water quality from construction impacts?

To the Petitioner's knowledge, there are no potable water wells located on, or within the vicinity of, the Property, with the exception of one well located on the adjacent parcel that is used by the compost and mulch facility. It is the Petitioner's understanding that the immediate vicinity of the Property is not served by a municipal water system.

The Petitioner does not anticipate that any adverse impact(s) to wells and/or water quality will result from the construction of the facility. The Petitioner designed the Project to meet CTDEEP's Appendix I, *Stormwater Management at Solar Array Construction Projects*. Additionally, during construction, the Petitioner will install and maintain erosion and sedimentation ("E&S") controls in accordance with the *2002 Connecticut Guidelines for Soil Erosion and Sediment Control*. Once the facility is operative, the stormwater generated by the Project will be handled and treated in accordance with the *2004 Connecticut Stormwater Quality Manual*.

33. The groundwater underlying the proposed site is classified as "GA". What fuel storage and spill prevention methods would the Petitioner employ to protect groundwater resources?

The Petitioner's proposed fuel storage and spill prevention methods are delineated in the Project's Spill Prevention Control Plan ("SPCP"). The SPCP will be included in the Project's Storm Water Prevention Control Plan ("SWPCP"), which will be submitted to the CTDEEP for its review as part of the General Permit application process. Some relevant excerpts from the SWPCP, outlining various aspects of the SPCC Plan and proposed protective measures for the Project, are appended hereto as Exhibit A.

34. Has the Petitioner consulted with DEEP Dam Safety program regarding permitting requirements, if any, for the proposed stormwater basins?

C-Tec has not yet consulted with the CTDEEP Dam Safety program regarding the permitting requirements, if any, for the proposed stormwater basins. However, C-Tec intends to discuss this matter with Dam Safety as part of its General Permit application.

As a note, C-Tec does not anticipate that there will be any permitting requirements for these features, as the three (3) proposed basins for the Project are all designed with storage volumes under three (3) acre-ft (130,680 cf.).

Environmental

35. Referring to Petition p. 21, a core forest value of 60.97 acres is given. Does this value represent the total core forest on the host parcel or does this include the core forest on the abutting parcel to the east, as shown in Figure 4? If the former is true, provide the total size of the contiguous core forest block and the size of two smaller core forest blocks shown in Figure 5.

The core forest value of approximately 60.97 acres represents the total core forest value for both the host parcel and the abutting parcel to the east.

36. Please submit photographic site documentation with notations linked to the site plans or a detailed aerial image that identify locations of site-specific and representative site features. The submission should include photographs of the site from public road(s) or publicly accessible area(s) as well as Site-specific locations depicting site features including, but not necessarily limited to, the following locations as applicable:

For each photo, please indicate the photo viewpoint direction and stake or flag the locations of site-specific and representative site features. Site-specific and representative site features include, but are not limited to, as applicable:

1. wetlands, watercourses and vernal pools;
2. forest/forest edge areas;
3. agricultural soil areas;
4. sloping terrain;
5. proposed stormwater control features;
6. nearest residences;
7. site access and interior access road(s);
8. utility pads/electrical interconnection(s);
9. clearing limits/property lines;
10. mitigation areas; and
11. any other noteworthy features relative to the Project.

A photolog graphic must accompany the submission, using a site plan or a detailed aerial image, depicting each numbered photograph for reference. For each photo, indicate the photo location number and viewpoint direction, and clearly identify the locations of site-specific and representative site features show (e.g., physical staking/flagging or other means of marking the subject area).

The submission shall be delivered electronically in a legible portable document format (PDF) with a maximum file size of <20MB. If necessary, multiple files may be submitted and clearly marked in terms of sequence.

The requested submission is too large to be attached, however, this submission can be accessed at: <https://allpoints.egnyte.com/dl/N5Vh5MdN6z>.

Facility Construction

- 37. Referring to Site Plan T-1, where would the 1,771 cubic yards of excess cut be disposed of?**

All excess material will be used onsite and not removed. More specifically, the Petitioner anticipates that the 1,771 cubic yards of excess cut will be deposited either within the existing recycling operations area or within the fenced Facility area. If the latter, this would result in less than half of an inch (1/2 in.) of fill dispersed over this location.

- 38. What is the approximate size of the area that needs to be re-graded to achieve slopes of 15 percent or less?**

The approximate size of the area that needs to be re-graded to achieve slopes of fifteen percent (15%) or less is four (4) acres.

- 39. Has the Petitioner met with the DEEP Stormwater Division? If yes, on what date? Please describe any recommendations, comments or concerns about the project provided by the Stormwater Division.**

Yes, on February 18, 2021, the Petitioner had a preliminary meeting with the CTDEEP Stormwater Division. There, the Petitioner presented the Project to the attending member of the DEEP Stormwater Division. No major concerns were brought up during the discussion, however.

- 40. Provide the estimated typical construction hours and days of the week (e.g. Monday through Friday 8 AM to 5 PM)?**

Typical construction hours and workdays of the week are as follows:

Monday – Friday: 7:00 AM to 5:00 PM.

Maintenance/Decommissioning

- 41. Provide a post-construction Operations and Maintenance Plan (O&M Plan) that includes, as applicable, site and equipment inspections/repairs; vegetation maintenance, stormwater basin maintenance, equipment cleaning, herbicide/pesticide use.**

A post-construction Operations and Maintenance Plan for the Project is attached hereto as Exhibit B.

- 42. Has the manufacturer of the proposed solar panels conducted Toxicity Characteristic Leaching Procedure (TCLP) testing to determine if the panels would be characterized as hazardous waste at the time of disposal under current regulatory criteria? If so, submit information that indicates the proposed solar modules would not be**

characterized as hazardous waste. If not, would the Petitioner agree to install solar panels that are not classified as hazardous waste through TCLP testing?

Yes, the respective manufacturer conducted Toxicity Characteristic Leaching Procedure (“TCLP”) testing to determine if the panels would be characterized as hazardous waste at the time of disposal under current regulatory criteria. The results of the TCLP testing revealed that the panels would not be characterized as hazardous waste. The test results are attached as Exhibit C.

43. In the lease agreement with the landowner, are there any provisions related to site restoration at the end of the project’s useful life? If so, please provide such provisions.

C-Tec has not yet finalized this aspect of the lease agreement with the landowner, as C-Tec is presently under the option development period that the parties negotiated. However, once finalized, the lease agreement will include various site restoration provisions, including decommissioning the facility and reseeded disturbed soils on the property.

44. Referring to Petition p. 13, provide a Project Decommissioning Plan. What features/structures would remain in place and for what reason(s)?

Decommissioning will involve removal and disposal or recycling of all above-surface project components. All recyclable materials will be transported to the appropriate nearby recycling facilities. Any non-recyclable materials will be properly disposed of at a nearby landfill. It is anticipated that 95% or greater of the project’s components will be recyclable. As noted above, all of the panels that are anticipated to be used for the project meet TCLP standards.

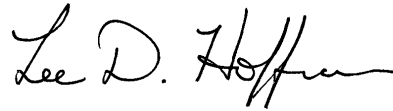
The project will first assess the existing conditions at the site prior to any removal of project components or demolition. Because decommissioning will take some time to accomplish, the project’s access roads, fencing, and electrical power will temporarily remain in place for use by the decommissioning and site restoration workers until no longer needed. Demolition debris will be placed in temporary on-site storage areas pending final transportation and disposal/recycling, as appropriate.

During decommissioning, the majority of the components will be either removed from the site and recycled or disposed of. The only materials that will remain in place after decommissioning would be any conduit or wiring that is in place and at least eighteen (18) inches below grade. Materials that will be removed will include all pad-mounted cabinets, above ground wiring, solar modules, solar module racking, string inverters, and panel boards. The posts that supported the module racking and inverters/panelboards will be mechanically removed from the ground; any resulting holes will be backfilled with locally imported soil to match existing site soil conditions. The concrete transformer and interconnection equipment pads will be broken up and removed.

The demolition debris and removed equipment may be cut or dismantled into pieces that can be safely lifted or carried with the on-site equipment being used. The majority of glass and steel and aluminum will be processed for transportation and delivery to an off-site recycling

center. The solar modules will be transported to and recycled at the nearest facility that will accept them. Minimal non-recyclable materials are anticipated; these will be properly disposed of at the nearest qualified disposal facility

Respectfully Submitted,
C-Tec Solar, LLC



By: _____

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Post-Construction Stormwater Management

Post-construction Guidelines

After the project is complete the developer will perform the following maintenance and restoration measures:

- Mowing and maintenance of the turf and vegetated areas will occur as needed.

Other Controls

Spill Prevention Control Plan

Certain precautions are necessary to store petroleum materials, refuel and contain and properly clean up any inadvertent fuel or petroleum (i.e., oil, hydraulic fluid, etc.) spill to avoid possible impact to nearby habitats.

A spill containment kit consisting of a sufficient supply of absorbent pads and absorbent material will be maintained by the Contractor at the construction site throughout the duration of the project. In addition, a waste drum will be kept on site to contain any used absorbent pads/material for proper and timely disposal off site in accordance with applicable local, state and federal laws.

The following petroleum and hazardous materials storage and refueling restrictions and spill response procedures will be adhered to by the Contractor.

1. Petroleum and Hazardous Materials Storage and Refueling
 - a. Refueling of vehicles or machinery shall occur within the Construction Laydown Area ONLY and shall take place on an impervious pad with secondary containment designed to contain fuels. This area is greater than 100' from a wetland
 - b. Any fuel or hazardous materials that must be kept on site shall be stored on an impervious surface utilizing secondary containment a minimum of 100 feet from wetlands or watercourses.
2. Initial Spill Response Procedures
 - a. Stop operations and shut off equipment.
 - b. Remove any sources of spark or flame.
 - c. Contain the source of the spill.
 - d. Determine the approximate volume of the spill.
 - e. Identify the location of natural flow paths to prevent the release of the spill to sensitive nearby waterways or wetlands.
 - f. Ensure that fellow workers are notified of the spill.
3. Spill Clean Up & Containment
 - a. Obtain spill response materials from the on-site spill response kit. Place absorbent materials directly on the release area.

- b. Limit the spread of the spill by placing absorbent materials around the perimeter of the spill.
 - c. Isolate and eliminate the spill source.
 - d. Contact the appropriate local, state and/or federal agencies, as necessary.
 - e. Contact a disposal company to properly dispose of contaminated materials in accordance with all local, state and federal regulations.
4. Reporting
- a. Complete an incident report.
 - b. Notify Regional Water Authority Control Room at 203-401-2629 (Staffed 24/7)
 - c. Submit a completed incident report to the appropriate Connecticut Department of Environmental Protection, Regional Water Authority, Municipal Official, Connecticut Siting Council and other applicable local, state and federal officials.

Waste Disposal

Construction site waste shall be properly managed and disposed of during the entire construction period. Additionally;

- A waste collection area will be designated. The selected area will minimize truck travel through the site and will not drain directly to the adjacent wetlands.
- Waste collection shall be scheduled regularly to prevent the containers from overfilling.
- Spills shall be cleaned up immediately.
- Defective containers that may cause leaks or spills will be identified through regular inspection. Any found to be defective will be repaired or replaced immediately.
- Any stockpiling of materials should be confined to the designated area as defined by the engineer.

Washout Areas

Washout of applicators, containers, vehicles and equipment for concrete shall be conducted in a designated washout area. No surface discharge of washout wastewaters from the area will be allowed. All concrete wash water will be directed into a container or pit such that no overflows can occur. Washout shall be conducted in an entirely self-contained system and will be clearly designed and flagged or signed where necessary. The washout area shall be located outside of any buffers and at least 50 feet from any stream, wetland or other sensitive water or natural resources as shown on the plans.

The designated area shall be designed and maintained such that no overflows can occur during rainfall or after snowmelt. Containers or pits shall be inspected at least once a week to ensure structural integrity, adequate holding capacity and will be repaired prior to future use if leaks are present. The contractor shall remove hardened concrete waste when it accumulates to a height of ½ of the container or pit or as necessary to avoid overflows. All concrete waste shall be disposed of in a manner consistent with all applicable laws, regulations and guidelines.

Exhibit B

Operations and Maintenance Plan

Maintenance and service work for the project will be performed through a combination of C-Tec personnel, approved subcontractors, or authorized vendor representatives. Operations at the solar facility site will be minimal. The PV panels are static and are monitored remotely. The owner/operator will be responsible for monitoring alerts from the automated alert system regarding potential system malfunction. It is not anticipated that any personnel will be permanently stationed at the project site. Rather, such personnel will visit the site on an as-needed basis.

Typical equipment and site maintenance activities are described in the following sections.

Equipment Maintenance

C-Tec and/or its authorized subcontractors will inspect and maintain Project equipment as required by manufacturers' specifications to ensure maintenance and proper operation of the solar PV equipment. During inspection, a visual review of the equipment, including subassemblies, wiring harnesses, contacts and major components will occur, and ambient operating temperature will be recorded.

The inverter modules will be inspected and reviewed for the following conditions:

- Discoloration of the inverter boards;
- Signs of damage on the power capacitors;
- Appearance and cleanliness of the cabinet, ventilation system and insulated surfaces;
- Corrosion on terminals and cables;
- Torque terminals, connectors and bolts, as needed;
- Signs of heating on the fuses; and
- Signs of damage or wear of both the alternating current and direct current surge suppressors.

In addition, the integrity of all safety devices and fencing will be reviewed to ensure site integrity. All deficiencies detected will be corrected to ensure safety and proper equipment function.

Site Maintenance

C-Tec and/or its authorized subcontractors will perform site maintenance activities to ensure safety and maintain site aesthetics. Grassed areas between the rows of module racks will be mowed a minimum of twice a year, or more often if required. The height of the grass will be maintained at a level to reduce the risk of grass fires. With respect to vegetation, it is not anticipated that any herbicides, pesticides or fertilizers will be utilized on site.

The site will be visited monthly for Project inspection and to perform maintenance as needed. During this time the site will be visually inspected, and any potential debris (such as fallen trees) near Project equipment or access areas will be removed. The condition of signage and proper functioning of access gates will also be inspected during the monthly site visits.

Array Cleaning Procedure

If the solar PV collection system is outputting a noticeably lower wattage or there is an accumulation of dirt of the modules, C-Tec and/or its authorized subcontractors will clean the PV panels. In New England, it is typical that seasonal rains are sufficient to keep the panels clean. In the event that panel cleaning is required, no chemicals will be used during the cleaning of the solar panels. Cleaning will be performed with water and a soft-bristled boom, if needed. Water will be trucked in from outside of the project area and applied from the back of a truck. The solar PV system will not need to be turned off during cleaning.

Stormwater Feature Procedure

There are three (3) stormwater management basins and four (4) pipe culverts on site that will require inspection at least once per year. The following are the maintenance requirements:

- Stormwater Management Basins
 - Inspect for damage, including erosion and rilling
 - Monitor sediment accumulation
 - Ensure that the basin and the outlet control are free of debris and operational
 - Mow the basin

- Pipe Culverts
 - Inspect for damage
 - Ensure that the pipes are free of debris and operational

Exhibit C



25712 Commercentre Drive
Lake Forest, California 92630
949.297.5020 Phone
949.297.5027 Fax

22 October 2020

Ralph Alvarado
Hanwha Q CELLS
400 Spectrum Center Drive, Ste 1400
Irvine, CA 92618
RE: TCLP Q-Peak Duo ML-G9

Enclosed are the results of analyses for samples received by the laboratory on 10/15/20 14:39. If you have any questions concerning this report, please feel free to contact me.

Sincerely,

A handwritten signature in black ink that reads 'Joann Marroquin'. The signature is written in a cursive style and is contained within a light gray rectangular box.

Joann Marroquin
Director of Operations



25712 Commercentre Drive
Lake Forest, California 92630
949.297.5020 Phone
949.297.5027 Fax

Hanwha Q CELLS
400 Spectrum Center Drive, Ste 1400
Irvine CA, 92618

Project: TCLP Q-Peak Duo ML-G9
Project Number: [none]
Project Manager: Ralph Alvarado

Reported:
10/22/20 16:01

ANALYTICAL REPORT FOR SAMPLES

Sample ID	Laboratory ID	Matrix	Date Sampled	Date Received
Sample #1	T203608-01	Soil	10/15/20 00:00	10/15/20 14:39
Sample #2	T203608-02	Soil	10/15/20 00:00	10/15/20 14:39
Sample #3	T203608-03	Soil	10/15/20 00:00	10/15/20 14:39

SunStar Laboratories, Inc.

The results in this report apply to the samples analyzed in accordance with the chain of custody document. This analytical report must be reproduced in its entirety.

Joann Marroquin, Director of Operations

Hanwha Q CELLS
400 Spectrum Center Drive, Ste 1400
Irvine CA, 92618

Project: TCLP Q-Peak Duo ML-G9
Project Number: [none]
Project Manager: Ralph Alvarado

Reported:
10/22/20 16:01

DETECTIONS SUMMARY

Sample ID: Sample #1 **Laboratory ID:** T203608-01

Analyte	Result	Reporting		Units	Method	Notes
		Limit				
Barium	0.38	0.10		mg/l	EPA 1311/6010/7000	
Lead	1.4	0.10		mg/l	EPA 1311/6010/7000	

Sample ID: Sample #2 **Laboratory ID:** T203608-02

Analyte	Result	Reporting		Units	Method	Notes
		Limit				
Barium	0.46	0.10		mg/l	EPA 1311/6010/7000	
Lead	1.5	0.10		mg/l	EPA 1311/6010/7000	

Sample ID: Sample #3 **Laboratory ID:** T203608-03

Analyte	Result	Reporting		Units	Method	Notes
		Limit				
Barium	0.37	0.10		mg/l	EPA 1311/6010/7000	
Lead	1.3	0.10		mg/l	EPA 1311/6010/7000	

SunStar Laboratories, Inc.



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Joann Marroquin, Director of Operations



25712 Commercentre Drive
 Lake Forest, California 92630
 949.297.5020 Phone
 949.297.5027 Fax

Hanwha Q CELLS 400 Spectrum Center Drive, Ste 1400 Irvine CA, 92618	Project: TCLP Q-Peak Duo ML-G9 Project Number: [none] Project Manager: Ralph Alvarado	Reported: 10/22/20 16:01
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Sample #1
T203608-01 (Soil)

Analyte	Result	Reporting Limit	Units	Dilution	Batch	Prepared	Analyzed	Method	Notes
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SunStar Laboratories, Inc.

TCLP Metals by 6000/7000 Series Methods

Mercury	ND	2.0	ug/l	1	0101637	10/16/20	10/21/20	EPA 1311/7470	
Arsenic	ND	0.10	mg/l	"	0101636	10/16/20	10/21/20	EPA 1311/6010/7 000	
Barium	0.38	0.10	"	"	"	"	"	"	
Cadmium	ND	0.10	"	"	"	"	"	"	
Chromium	ND	0.10	"	"	"	"	"	"	
Lead	1.4	0.10	"	"	"	"	"	"	
Selenium	ND	0.10	"	"	"	"	"	"	
Silver	ND	0.10	"	"	"	"	"	"	

SunStar Laboratories, Inc.

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Joann Marroquin, Director of Operations



25712 Commercentre Drive
 Lake Forest, California 92630
 949.297.5020 Phone
 949.297.5027 Fax

Hanwha Q CELLS 400 Spectrum Center Drive, Ste 1400 Irvine CA, 92618	Project: TCLP Q-Peak Duo ML-G9 Project Number: [none] Project Manager: Ralph Alvarado	Reported: 10/22/20 16:01
---	---	-----------------------------

Sample #2
T203608-02 (Soil)

Analyte	Result	Reporting Limit	Units	Dilution	Batch	Prepared	Analyzed	Method	Notes
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SunStar Laboratories, Inc.

TCLP Metals by 6000/7000 Series Methods

Mercury	ND	2.0	ug/l	1	0101637	10/16/20	10/21/20	EPA 1311/7470	
Arsenic	ND	0.10	mg/l	"	0101636	10/16/20	10/21/20	EPA 1311/6010/7 000	
Barium	0.46	0.10	"	"	"	"	10/21/20	"	
Cadmium	ND	0.10	"	"	"	"	10/21/20	"	
Chromium	ND	0.10	"	"	"	"	"	"	
Lead	1.5	0.10	"	"	"	"	10/21/20	"	
Selenium	ND	0.10	"	"	"	"	10/21/20	"	
Silver	ND	0.10	"	"	"	"	"	"	

SunStar Laboratories, Inc.

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Joann Marroquin, Director of Operations



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 Lake Forest, California 92630
 949.297.5020 Phone
 949.297.5027 Fax

Hanwha Q CELLS 400 Spectrum Center Drive, Ste 1400 Irvine CA, 92618	Project: TCLP Q-Peak Duo ML-G9 Project Number: [none] Project Manager: Ralph Alvarado	Reported: 10/22/20 16:01
---	---	-----------------------------

Sample #3
T203608-03 (Soil)

Analyte	Result	Reporting Limit	Units	Dilution	Batch	Prepared	Analyzed	Method	Notes
---------	--------	-----------------	-------	----------	-------	----------	----------	--------	-------

SunStar Laboratories, Inc.

TCLP Metals by 6000/7000 Series Methods

Mercury	ND	2.0	ug/l	1	0101637	10/16/20	10/21/20	EPA 1311/7470	
Arsenic	ND	0.10	mg/l	"	0101636	10/16/20	10/21/20	EPA 1311/6010/7 000	
Barium	0.37	0.10	"	"	"	"	"	"	
Cadmium	ND	0.10	"	"	"	"	"	"	
Chromium	ND	0.10	"	"	"	"	"	"	
Lead	1.3	0.10	"	"	"	"	"	"	
Selenium	ND	0.10	"	"	"	"	"	"	
Silver	ND	0.10	"	"	"	"	"	"	

SunStar Laboratories, Inc.

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Joann Marroquin, Director of Operations



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Hanwha Q CELLS 400 Spectrum Center Drive, Ste 1400 Irvine CA, 92618	Project: TCLP Q-Peak Duo ML-G9 Project Number: [none] Project Manager: Ralph Alvarado	Reported: 10/22/20 16:01
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TCLP Metals by 6000/7000 Series Methods - Quality Control
SunStar Laboratories, Inc.

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Notes
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Batch 0101636 - TCLP Metals

Blank (0101636-BLK1)				Prepared: 10/16/20 Analyzed: 10/21/20						
Arsenic	ND	0.10	mg/l							
Barium	ND	0.10	"							
Cadmium	ND	0.10	"							
Chromium	ND	0.10	"							
Lead	ND	0.10	"							
Selenium	ND	0.10	"							
Silver	ND	0.10	"							

LCS (0101636-BS1)				Prepared: 10/16/20 Analyzed: 10/21/20						
Arsenic	0.568	0.10	mg/l	0.500		114	75-125			
Barium	0.488	0.10	"	0.500		97.7	75-125			
Cadmium	0.527	0.10	"	0.500		105	75-125			
Chromium	0.496	0.10	"	0.500		99.3	75-125			
Lead	0.484	0.10	"	0.500		96.9	75-125			

Matrix Spike (0101636-MS1)				Source: T203608-01		Prepared: 10/16/20 Analyzed: 10/21/20				
Arsenic	0.510	0.10	mg/l	0.500	ND	102	75-125			
Barium	0.810	0.10	"	0.500	0.378	86.3	75-125			
Cadmium	0.469	0.10	"	0.500	0.000237	93.7	75-125			
Chromium	0.446	0.10	"	0.500	0.00161	88.8	75-125			
Lead	1.82	0.10	"	0.500	1.42	80.4	75-125			

Matrix Spike Dup (0101636-MSD1)				Source: T203608-01		Prepared: 10/16/20 Analyzed: 10/21/20				
Arsenic	0.497	0.10	mg/l	0.500	ND	99.4	75-125	2.64	30	
Barium	0.792	0.10	"	0.500	0.378	82.7	75-125	2.19	30	
Cadmium	0.460	0.10	"	0.500	0.000237	91.9	75-125	2.02	30	
Chromium	0.433	0.10	"	0.500	0.00161	86.3	75-125	2.83	30	
Lead	1.79	0.10	"	0.500	1.42	74.4	75-125	1.64	30	QM-05

SunStar Laboratories, Inc.

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Joann Marroquin, Director of Operations

Hanwha Q CELLS
400 Spectrum Center Drive, Ste 1400
Irvine CA, 92618

Project: TCLP Q-Peak Duo ML-G9
Project Number: [none]
Project Manager: Ralph Alvarado

Reported:
10/22/20 16:01

TCLP Metals by 6000/7000 Series Methods - Quality Control

SunStar Laboratories, Inc.

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Notes
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Batch 0101637 - TCLP Hg CV

Blank (0101637-BLK1)

Prepared: 10/16/20 Analyzed: 10/21/20

Mercury	ND	2.0	ug/l							
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LCS (0101637-BS1)

Prepared: 10/16/20 Analyzed: 10/21/20

Mercury	5.34	2.0	ug/l	5.00		107	75-125			
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Matrix Spike (0101637-MS1)

Source: T203608-01

Prepared: 10/16/20 Analyzed: 10/21/20

Mercury	4.90	2.0	ug/l	5.00	0.0140	97.8	75-125			
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Matrix Spike Dup (0101637-MSD1)

Source: T203608-01

Prepared: 10/16/20 Analyzed: 10/21/20

Mercury	5.10	2.0	ug/l	5.00	0.0140	102	75-125	3.96	30	
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SunStar Laboratories, Inc.



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Joann Marroquin, Director of Operations

Hanwha Q CELLS
400 Spectrum Center Drive, Ste 1400
Irvine CA, 92618

Project: TCLP Q-Peak Duo ML-G9
Project Number: [none]
Project Manager: Ralph Alvarado

Reported:
10/22/20 16:01

Notes and Definitions

QM-05 The spike recovery was outside acceptance limits for the MS and/or MSD due to possible matrix interference. The LCS was within acceptance criteria. The data is acceptable as no negative impact on data is expected.

DET Analyte DETECTED

ND Analyte NOT DETECTED at or above the reporting limit

NR Not Reported

dry Sample results reported on a dry weight basis

RPD Relative Percent Difference

SunStar Laboratories, Inc.



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Joann Marroquin, Director of Operations



WORK ORDER

T203608

Client: Hanwha Q CELLS	Project Manager: Joann Marroquin
Project: TCLP Q-Peak Duo ML-G9	Project Number: [none]

Report To:

Hanwha Q CELLS
 Ralph Alvarado
 300 Spectrum Center Dr., Ste 1250
 Irvine, CA 92618

Date Due:	10/22/20 17:00 (5 day TAT)	Date Received:	10/15/20 14:39
Received By:	Joann Marroquin	Date Logged In:	10/15/20 15:20
Logged In By:	Joann Marroquin		

Samples Received at:

Custody Seals	No	Received On Ice	No
Containers Intact	Yes		
COC/Labels Agree	Yes		
Preservation Confirmed	No		

Analysis	Due	TAT	Expires	Comments
T203608-01 Sample #1 [Soil] Sampled 10/15/20 00:00 (GMT-08:00) Pacific Time (US &				
TCLP Leaching Procedure Metals	10/22/20 15:00	5	04/13/21 00:00	
TCLP RCRA 8	10/22/20 15:00	5	04/13/21 00:00	
T203608-02 Sample #2 [Soil] Sampled 10/15/20 00:00 (GMT-08:00) Pacific Time (US &				
TCLP Leaching Procedure Metals	10/22/20 15:00	5	04/13/21 00:00	
TCLP RCRA 8	10/22/20 15:00	5	04/13/21 00:00	
T203608-03 Sample #3 [Soil] Sampled 10/15/20 00:00 (GMT-08:00) Pacific Time (US &				
TCLP Leaching Procedure Metals	10/22/20 15:00	5	04/13/21 00:00	
TCLP RCRA 8	10/22/20 15:00	5	04/13/21 00:00	

Analysis groups included in this work order

TCLP RCRA 8

sub TCLP RCRA 8	sub TCLP Hg CV
-----------------	----------------



WORK ORDER

T203608

Client: Hanwha Q CELLS	Project Manager: Joann Marroquin
Project: TCLP Q-Peak Duo ML-G9	Project Number: [none]

Report To:

Hanwha Q CELLS
 Ralph Alvarado
 400 Spectrum Center Drive, Ste 1400
 Irvine, CA 92618

Date Due:	10/22/20 17:00 (5 day TAT)	
Received By:	Joann Marroquin	Date Received: 10/15/20 14:39
Logged In By:	Joann Marroquin	Date Logged In: 10/15/20 15:20

Samples Received at:

Custody Seals	No	Received On Ice	No
Containers Intact	Yes		
COC/Labels Agree	Yes		
Preservation Confirmed	No		

Analysis	Due	TAT	Expires	Comments
T203608-01 Sample #1 [Soil] Sampled 10/15/20 00:00 (GMT-08:00) Pacific Time (US &				
TCLP Leaching Procedure Metals	10/22/20 15:00	5	04/13/21 00:00	
TCLP RCRA 8	10/22/20 15:00	5	04/13/21 00:00	
T203608-02 Sample #2 [Soil] Sampled 10/15/20 00:00 (GMT-08:00) Pacific Time (US &				
TCLP Leaching Procedure Metals	10/22/20 15:00	5	04/13/21 00:00	
TCLP RCRA 8	10/22/20 15:00	5	04/13/21 00:00	
T203608-03 Sample #3 [Soil] Sampled 10/15/20 00:00 (GMT-08:00) Pacific Time (US &				
TCLP Leaching Procedure Metals	10/22/20 15:00	5	04/13/21 00:00	
TCLP RCRA 8	10/22/20 15:00	5	04/13/21 00:00	

Analysis groups included in this work order

TCLP RCRA 8

sub TCLP RCRA 8 sub TCLP Hg CV



Excelchem Laboratories, Inc.

A Silver State Analytical Company

STLC/TTLC Regulatory Limits

Soluble Threshold Limit Concentration (STLC) and Total Threshold Limit Concentration (TTLC) Regulatory Limits*

Organic Substances	STLC Level (mg/L)	TTLC Level (mg/Kg - wet weight)
Aldrin	0.14	1.4
Chlordane	0.25	2.5
DDT, DDE, DDD	0.1	1
2,4-Dichlorophenoxyacetic acid	10	100
Dieldrin	0.8	8
Dioxin (2,3,7,8-TCDD)	0.001	0.01
Endrin	0.02	0.2
Heptachlor	0.47	4.7
Kepone	2.1	21
Lead compounds, organic	-	13
Lindane (gamma-BHC)	0.4	4
Methoxychlor	10	100
Mirex	2.1	21
Pentachlorophenol	1.7	17
PCBs (Polychlorinated Biphenyls)	5.0	50
Toxaphene	0.5	5
Trichloroethylene	204	2040
2,4,-Trichlorophenoxypropionic acid	1.0	10

* Used for California regulated hazardous waste. Source is California Code of Regulations, Title 22, Chapter 11, Article 3.



Excelchem Laboratories, Inc.

A Silver State Analytical Company

STLC/TTLC Regulatory Limits

Soluble Threshold Limit Concentration (STLC) and Total Threshold Limit Concentration (TTLC) Regulatory Limits*

Inorganic Substances	STLC** Level (mg/L)	TTLC*** Level (mg/Kg - wet weight)
Antimony (and/or Sb compounds)	15	500
Arsenic (and/or As compounds)	5	50
Asbestos	-	1%
Barium (and/or Ba compounds)	100	10000****
Beryllium (and/or Be compounds)	0.75	75
Cadmium (and/or Cd compounds)	1	100
Chromium VI compounds	5	500
Chromium (and/or Cr III compounds)	5*****	2500
Cobalt (and/or Co compounds)	80	8000
Copper (and/or Cu compounds)	25	2500
Fluoride salts	180	18000
Lead (and/or Pb compounds)	5	1000
Mercury (and/or Hg compounds)	0.2	20
Molybdenum (and/or Mo compounds)	350	3500
Nickel (and/or Ni compounds)	20.0	2000
Selenium (and/or Se compounds)	1	100
Silver (and/or Ag compounds)	5	500
Thallium (and/or Tl compounds)	7.0	700
Vanadium (and/or V compounds)	24	2400
Zinc (and/or Zn compounds)	250	5000

* Used for California regulated hazardous waste. Source is California Code of Regulations, Title 22, Chapter 11, Article 3.

** If a substance is ten times (by rule of thumb) the STLC value found on the TTLC, the Waste Extraction test (WET) should be used. If any substance in the waste so analyze equals or exceeds the STLC value, it is considered a hazardous toxic waste.

***If a substance in a waste equals or exceeds the TTLC level, it is considered a hazardous toxic waste.

**** Excludes barium Sulfate

***** If the soluble chromium as determined by the TCLP is less than 5mg/L, and the soluble chromium as determined by the STLC test equals or exceeds 560mg/L, and the waste is not otherwise identified as a RCRA hazardous waste, then the waste is a non-RCRA hazardous waste.



Excelchem Laboratories, Inc.

A Silver State Analytical Company

TCLP

Toxicity Characteristic Leaching Procedure Regulatory Levels

Metals	TCLP Reg Level	units
Arsenic	5.0	mg/L
Barium	100.0	mg/L
Cadmium	1.0	mg/L
Chromium	5.0	mg/L
Lead	5.0	mg/L
Mercury	0.2	mg/L
Selenium	1.0	mg/L
Silver	5.0	mg/L

Volatile Organics	TCLP Reg Level	units
Benzene	0.5	mg/L
Carbon Tetrachloride	0.5	mg/L
Chlorobenzene	100.0	mg/L
Chloroform	6.0	mg/L
1,4-Dichlorobenzene	7.5	mg/L
1,2-Dichloroethane	0.5	mg/L
1,1-Dichloroethylene	0.7	mg/L
Methyl Ethyl Ketone	200.0	mg/L
tetrachloroethylene	0.7	mg/L
Trichloroethylene	0.5	mg/L
Vinyl Chloride	0.2	mg/L

Semi-Volatile Organics	TCLP Reg Level	units
o-Creosol*	200.0	mg/L
m-Creosol*	200.0	mg/L
p-Creosol*	200.0	mg/L
Creosol*	200.0	mg/L
2,4-Dinitrotoluene**	0.1	mg/L
Hexachlorobenzene**	0.1	mg/L
Hexachlorobutadiene	0.5	mg/L
Hexachloroethane	3.0	mg/L
Nitrobenzene	2.0	mg/L
Petachlorophenol	100.0	mg/L
Pyridine**	5.0	mg/L
2,4,5-Trichlorophenol	400.0	mg/L
2,4,6-Trichlorophenol	2.0	mg/L

* If o-, m-, and p-Creosol cannot be differentiated, total Creosol can be used.

** Quantitation limit is greater than the calculated regulatory level. The quantitation limit therefore becomes the regulatory level.



Excelchem Laboratories, Inc.
A Silver State Analytical Company

TCLP

Toxicity Characteristic Leaching Procedure Regulatory Levels

Organochlorine Pesticides	TCLP Reg Level	units
Chlordane	0.03	mg/L
Endrin	0.02	mg/L
Heptachlor (and Heptachlor Epoxide)	0.008	mg/L
Lindane (gamma-BHC)	0.40	mg/L
Methoxychlor	10.0	mg/L
Toxaphene	0.50	mg/L

Chlorophenoxy Acid Herbicides	TCLP Reg Level	units
2,4-D	10.0	mg/L
2,4,5-TP (Silvex)	1.0	mg/L