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February 16, 2022

VIA ELECTRONIC MAIL

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

Re: Docket 492 - Gravel Pit Solar – Application for Certificate of Environmental Compatibility and Public Need to The Connecticut Siting Council Regarding a Solar Project in East Windsor, Connecticut

Dear Ms. Bachman:

I am writing to you on behalf of our client, Gravel Pit Solar, in connection with the above-referenced Docket. As you are aware, the Siting Council has requested the following of my client prior to construction:

1. A copy of the Spill Pollution Control and Countermeasure (SPCC) Plan and
2. Contact information for the contractor that will be performing work on the project.

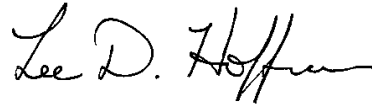
In response to the above, I am enclosing a copy of the SPCC Plan for the project. In addition, the contact information for our contractor for this phase of the project, Supreme Industries, Inc., is as follows:

Jamieson Boucher
Project Manager
Supreme Industries Inc.
860-485-4101
jboucher@supremeindustries.com

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Should you have any questions concerning this submittal, please contact me at your convenience. I certify that copies of this submittal have been made to all parties on the Docket Service List as of this date.

Sincerely,

A handwritten signature in black ink that reads "Lee D. Hoffman". The signature is written in a cursive style with a large, stylized "L" and "H".

Lee D. Hoffman

Enclosure

Construction
Spill Prevention, Control, and Countermeasure (SPCC) Plan

Gravel Pit Solar
East Windsor, CT
February 2022

1. Introduction

This Spill Prevention, Control, and Countermeasure (SPCC) Plan outlines the project scope of work to prevent, respond, and report oil spills and releases to the environment during the construction. A company and site-specific plan may be developed by the lead contractor and/or subcontractors prior to construction.

This SPCC Plan addresses the requirements of the EPA regulations specified in Title 40 of the Code of Federal Regulations (CFR). These regulations codified in 40 CFR Part 112 establish the procedures, methods, and equipment to prevent discharge of oil (i.e., petroleum oil and non-petroleum products) from non-transportation related onshore and offshore facilities into or upon the navigable Waters of the United States or adjoining shorelines.

SPCC plans for facilities are prepared and implemented as required by the U.S. Environmental Protection Agency (USEPA) Regulation 40 CFR 112. A non-transportation-related facility is subject to SPCC regulations if:

- The facility's total aboveground storage capacity exceeds 1320 gallons; or
- The facility's total underground storage tank (UST) capacity exceeds 42,000 gallons; and
- If, due to its location, the facility could reasonably be expected to discharge oil into or upon the navigable waters or adjoining shorelines of the United States.

For this project, the proposed aboveground oil storage capacity is not anticipated to exceed 1,320 gallons, will not use an underground storage tank, and the facility is not expected to discharge oil into waters. Therefore, a SPCC plan would not technically be required to be filed in accordance to 40 CFR 112, but a copy will be available for on-site review by the Regional Administrator during normal working hours.

2. Prevention of Releases to the Environment during Construction and Operation

2.1 Procedures to prevent releases to the environment

Supreme Industries Inc. (SII) will exercise due diligence to prevent, contain, and respond to spills of hazardous material, hazardous substances, hazardous waste, sewage, regulated gas, petroleum, lubrication oil, and other substances regulated by environmental law. SII will maintain spill cleanup equipment and materials at the work site. In the event of a spill, SII will take prompt, effective action to stop, contain, curtail, or otherwise limit the amount, duration, and severity of the spill/release. This plan is to address any leaks or spills of fuels, hazardous substances, solvents or lubricants.

SII will conduct fueling and lubricating of equipment and motor vehicles in a manner that protects against spills and evaporation. Spill kit will be provided on site and staff will be trained in how to use the spillkit. In accordance with 40 CFR 112. SII will surround all temporary fuel oil or petroleum storage tanks with a temporary berm or containment of sufficient size and strength to contain the contents of the tanks, plus 10percent freeboard for precipitation. The berm will be impervious to oil for 72 hours and be constructed so that any discharge will not permeate, drain, infiltrate, or otherwise escape before cleanup occurs.

Provide general secondary containment for oil transfer operations as required by 40 CFR 112.7. Project oil storage details are provided in Table 1.

Table 1: Oil storage (Construction)

Description	Secondary Containment	Type	Volume	Location	Use
Diesel Fuel (Temporary)	Double-Walled	Mobile Refueler	(1) 750 Gallons	Mobile – Moving throughout the site with equipment.	Fueling construction equipment during construction.
Diesel Fuel (Temporary)	Single-Walled	Truck Mount Tank	(1) 100 Gallon	Mobile – Moving throughout the site with equipment.	Fueling construction equipment during construction.

2.1.1 Aquifer Protection and Water Resources

SII will avoid refueling within 200 feet of wetlands and watercourses. Refueling will not be allowed within the designated aquifer protection areas.

Spill response equipment will be available on-site at all times along with personnel trained in the proper use of such equipment. A person or persons will be designated by the SII for emergency response coordination on a 24/7 basis (Site Contact and Emergency Contact provided in Section 5.1 below).

Notification of the project start date will be sent to the Public Water System as soon as it has been determined. Public Water System personnel should be granted daily site access to review compliance with site best management practices. The Public Water System, Department of Public Health Drinking Water Section (860-509-7333 OR after hours at 860-509-8000), and appropriate sections of the Department of Energy and Environmental Protection must be notified immediately of any chemical/fuel spill or any major failure of an erosion and sedimentation control at the construction site. Emergency telephone numbers and a statement identifying the construction site as a sensitive public water supply area should be posted where they are readily visible to contractors and other on-site personnel. A note should be added to the construction documents stating the sensitivity of the area.

3. Personnel Training

All personnel, contractors, subcontractor personnel, operators, technicians, and temporary employees, working at the project site are to be briefed in hazardous material management and spill prevention as part of SII new hire Environmental, Safety and Health orientation (ES&H). In addition, Supervisor Environmental Awareness Training will be provided for non-manual personnel, supervisors, foremen, and subcontractor supervision, as needed. Those personnel responsible for actively responding to and

cleaning up small and incidental spills and handling wastes shall be trained in the proper use of response materials and equipment and the use of personal protective equipment for potential hazards. Supervisors and foreman will be responsible for supervising training of new employees and after to ensure the best practices are being carried out to prevent a spill.

4. Emergency Procedures

Contractors will respond to any spills or release that occur and will provide spill response. The Project Field Superintendent shall be notified when a release occurs, no matter the quantity or responsible party. A typical Project spill kit material list is provided below. Oily debris and or contaminated soil will be properly disposed of. Additionally, container storage will be set up on an as-needed basis for oily rag disposal and clean up materials within the construction lay down yard/staging area.

5. Reporting

5.1. Site Contact and Emergency Contact

Facility Owner: Connor Cox Gravel Pit Solar Asset Manager 212-478-0937	State Agency: Connecticut Department of Energy & Environmental Protection 79 Elm Street, Hartford, CT 06106-5127 Office: (860) 424-3000
Site Contact: Claude St Pierre Supreme Industries Inc. Superintendent 508-789-3478 cstpierre@supremeindustries.com	Local Fire Department: East Windsor Fire Marshal (Interim) 125 Maine Street, Broad Brook, CT (860) 993-4086 Emergency: 911
Construction Project Manager: Jamieson Boucher Supreme Industries Inc. Project Manager 860-485-4101 jboucher@supremeindustries.com	Local Police Department: East Windsor Police 25 School Street East Windsor, Connecticut (860) 292-8240 Emergency (911)
Construction Assistant Project Manager:	Hospital: Rockville General Hospital - Emergency Department 31 Union St, Vernon, CT 06066 (860) 872-5291 24 Hours Emergency: 911
Spill /Emergency Coordinator: Neil Warner Supreme Industries Inc. HSE Manager 860-414-1291 nwarner@supremeindustries.com	Department of Public Health Water Section (860-509-7333 or after hours at 860-509-8000)

5.2 Internal Reporting

A designated spill coordinator shall be notified of all spills and releases, regardless of the volume of the release. After a release has occurred, the spill coordinator will determine if additional reporting to a regulatory agency or the contractor's legal departments is required. The Construction Project Manager will notify Owner of any major spills or releases. In addition to these requirements, all environmental incidents and spills less than the reportable quantities will be recorded in a Project's Incidental Spill Log.

5.3 External Reporting

The Spill coordinator, Project Manager or Owner will notify/advise all appropriate regulatory agencies that a release that triggered a regulatory notification has occurred along with pertinent information regarding the release.

6. Spill Kits

Spill kits will be used throughout the project site to support the first response and subsequent cleanup of spills and releases that occur on the project. The following sections provide recommendations for typical spill kits.

6.1 Vehicular Spill Kit

Each vehicle on site should carry a spill kit which meets the following specifications:

- Packaged spill kit to absorb up to 5 gallons of oil
- Absorbent mats/pads
- Absorbent socks
- Temporary disposal bags
- Protective gloves/Tyvek suit/labels

Vehicles and equipment with chronic leaking issues will be stored with plastic sheeting under to catch any leaks until equipment can be repaired or removed from site.

6.2 Large Spill Station

A large spill station shall be provided in all areas where liquid chemicals, oils or other fluids are used or stored. Fueling locations and jobsite trailers will contain large spill stations. Large spill stations shall provide sufficient absorbent and response materials to mitigate a variety of spill conditions and situations. The spill station shall be contained in a weather-proof box, drum, wheeled/lidded container, or trunk which can be mobilized to the spill site. They shall have the following attributes:

6.3 Bulk Oil Absorbent Pads

A sufficient quantity of bulk oil absorbent pads will be maintained onsite for response to spills to land or water. Pads must be hydrophobic and float on water. Sufficient inventory will be maintained to absorb at least 100 gallons (400 liters) of oil.

6.4 Loose Absorbent

Granular absorbent will be maintained for use in areas where there is a likelihood of small spills, drips, or splashes of oil. Granular absorbent can be clay, cellulose, peat, cat litter, or other appropriate biodegradable or natural proven absorbent material. Loose absorbent will be packaged or containerized in such a manner as to facilitate ease of use and distribution. Polypropylene or other man-made, non-biodegradable materials are not permitted.

6.5 Typical Project-Assembled Spill Kit Supplies

- Plastic/metal 55-gallon barrel or 40-gallon wheeled trash container with lid and labeled
- Bulk granular, diatomaceous earth, absorbent material
- Oil-absorbent pads and booms
- Large trash bags
- Rubber gloves
- Safety goggles
- Tyvek suits and coverall