SNEW
South Norwalk Electric and Water
A Municipal Utility System
Serving the Needs of the Community

ALAN E. HUTH, General Manager

ALAN E. HUTH, Director of Water Operations
SCOTT MURPHY, Director of Electric Operations
ERIC D. STROM, Director of Customer Care & Finance

Ms. Melanie Bachman
Executive Director
Connecticut Siting Council
State of Connecticut
10 Franklin Square
New Britain, CT 06051

October 14, 2020

Re: Non-Compliance Letter / Docket 431

Dear Ms. Bachman

Concerning the above referenced docket, your letter dated October 18, 2019; brought to our attention that there were certain documents that were not on file with the Siting Council. Specifically, these documents were required by per RSCA 16-50j-62(b) and per RSCA 16-50j-62(c) and are as follows:

Notification of commencement of construction
Monthly progress reports
Notification of completion of construction & commencement of operation
Final Report

SNEW regrets that due to its lack of oversight, that the documents requested by the Council were not submitted during the active phase of the construction of this project. While we believe that our contract documents required all contractors and sub-contractors to comply with all permitting and reporting requirements of all agencies having authority over this project, it ultimately falls to SNEW to ensure that this was done. Since a significant amount of time has passed since the construction has been completed, certain details of the project presented here are based on best information currently available. This relates mainly to the monthly progress reports as we have limited details on the exact status of the construction progress at precisely the monthly interval dates. SNEW believes that the information submitted herein is an accurate representation of what transpired on the project. Further, SNEW believes that the current monthly inspections and resultant maintenance, which have been ongoing since the commissioning of the substation, are key components of the D&M plan. Since the substation was essentially built according to plan and basically within the proposed timeframe, there is little deviation to report during the construction phase. Therefore, SNEW respectfully requests that the Council accept this document as the satisfactory completion of the reporting requirements.

Sincerely,

Alan Huth
General Manager
South Norwalk Electric & Water

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APPENDIX I

TREE REMOVAL & SOIL REMEDIATION
D & M Plan – Phase I

- Commencement of Construction: 8/20/2013

- Progress Reports:

  No specific information exists as to the exact status of the tree removal & the soil remediation at the beginning of each month during this phase of the construction. The construction was done in two phases, the tree removal and then the soil remediation and rough grading of the site with the replacement fill. This part of the project only took 2 months to complete and the pictures in Exhibit A shows the construction in progress.

- Completion of Construction: 10/17/2013

- Final Report:

  All trees were removed in accordance with the D & M Plan – Phase I submitted on 5/10/2013 and approved on 5/16/2013. A total of 56 trees in the immediate area of the substation footprint were removed. In addition, approximately 35 more trees were removed in the surrounding area, or construction zone, to facilitate staging and access / egress to the property. As noted, approximately 116 existing trees on property were left untouched. Also, upon completion of the project, a total of 11 Japanese cherry trees and 43 giant green arborvitaes were planted along the east and north borders of the substation fencing. The only item in the Phase I plan that was not completed was the installation of "screening" slats in the fence fabric. This will be discussed in greater detail in Appendix IV - Summary.

  As for the soil remediation, SNEW contracted with Hygenix, Inc., a Licensed Environment Professional (LEP) firm, to study and recommend a plan for the soil remediation for the portion of the property formerly occupied by a car repair shop. The contaminants were identified as well as their location on property and they were excavated, removed, and properly disposed. 802 tons of petroleum impacted soil was processed by the Ted Ondrick facility in Chicopee, MA and 3,618.5 tons of impacted fill material was disposed at the South Hadley Landfill in South Hadley, MA. Clean fill was then brought in to replace the removed soils and brought to rough grade. The pictures in Exhibit A shows an area where the trees have been removed and the soil remediation in progress. Also, the document in Exhibit B, dated 12/14/2018, shows the acceptance by the Department of Energy & Environmental Protection (DEEP) that certification that the site has been brought into compliance with Remediation Standard Regulations has been satisfactorily completed per the regulations of Connecticut State Agencies.

EXHIBIT A


Environmental Clean-up
In Progress At This Site
For Further
Information Contact:
Art Morris
HYGENIX, inc.


CONCORD

EXHIBIT B

Connecticut Department of
ENERGY &
ENVIRONMENTAL
PROTECTION

79 Elm Street • Hartford, CT 06106-5127 www.ct.gov/deep Affirmative Action/Equal Opportunity Employer

Bureau of Water Protection and Land Reuse
Remediation Division

Letter of No Audit

Verification of Investigation and Remediation

Alan Huth
Director of Water Operations
Second Taxing District - Norwalk
164 Old Boston Road
Wilton, CT 06897

Arthur B. Morris
License # 257
Hygenix, Inc.
49 Woodside Street
Stamford, CT 06902

RE:	Verification of Investigation and Remediation Wrinns Auto Body 182 Dr. Martin Luther King Jr. Drive Norwalk, CT	Ver #	1462
		Rem #	9583

more fully described in the Norwalk Tax Assessor's Office as lot 40, block 68, on map 16 NW

On October 15, 2009, the Remediation Division of the Bureau of Water Protection and Land Reuse received a Form III filing for the transfer of the referenced property establishment, pursuant to Section 22a-134a(c) of the Connecticut General Statutes. Mr. John M. Hiscock certified on the Form III, as signatory for Second Taxing District - Norwalk, that the parcel would be investigated in accordance with prevailing standards and guidelines and that pollution caused by any release of a hazardous waste or substance from the establishment would be remediated in accordance with the remediation standards.

On June 15, 2018, Mr. Arthur B. Morris verified, on behalf of Second Taxing District - Norwalk, that an investigation had been performed at the parcel in accordance with prevailing standards and guidelines, and that all releases existing at the property establishment at the time of the verification have been remediated in accordance with the Remediation Standard Regulations, §22a-133k-1 through 3 (RSRs) of the Regulations of Connecticut State Agencies.

Thank you for submitting the verification. The Commissioner does not intend to audit the verification signed and sealed by Mr. Morris.

This verification stands on its own merit and will be filed. The Commissioner may not have reviewed the technical aspects of this verification or the LEP's application of the RSRs. The Commissioner does not intend to revisit this verification. However, if information is brought to the Commissioner's attention that the investigations conducted as a basis for the verification were not performed in accordance with prevailing standards and guidelines, provisions of the RSRs that were used to achieve compliance with the RSRs were mis-applied, or that the releases were not remediated in accordance with the RSRs, the Commissioner may initiate an audit of Mr. Morris's verification pursuant to CGS Section 22a-134a(g)(3), and institute any proceeding, or take any action to require further investigation or further action to prevent or abate pollution.

The subject verification and all supporting documentation will be placed in the Department's public file for the referenced parcel. If you have any questions regarding this matter, you may contact Claire Quinn at 860/424-3709, or at Claire.Quinn@ct.gov.

Peter Hill
Supervising Environmental Analyst
Remediation Division
Bureau of Water Protection and Land Reuse

12/19/18
Date

c: Kim Maiorano, DEEP
Claire Quinn, DEEP
Amanda Killeen, DEEP

APPENDIX II

GRADING, SOIL EROSION & SEDIMENTATION CONTROL, AND FOUNDATIONS
D & M Plan – Phase II

- Commencement of Construction: 10/21/2013

- Progress Reports:

  Again, there are no definitive information available to document the exact status of construction at the defined monthly intervals. The construction was performed in accordance with the approved D&M plan Phase II and the contract documents issued for construction and coordinated within the project boundaries to accommodate both Eversource and SNEW construction schedules. While soil erosion and sedimentation control were done collectively for the entire site, the foundations and grading were split into 2 distinct segments. The Eversource foundations were installed first and rough graded to near final grade. Then the process was repeated and the SNEW foundations were installed and rough graded. There is an overlap here with Phase III as the SNEW foundations and grading were installed as part of the civil construction identified in the final phase. The specific line items for the foundation construction can be found in Exhibit D in Appendix III.

- Completion of Construction: 5/1/2014

- Final Report:

  The design for soil erosion and sedimentation controls were consistent with the 2002 Connecticut Guidelines for Soil Erosion and Sediment Control. SNEW hired LEGGETTE, BRASHEARS & GRAHAM, INC. Professional Groundwater and Environmental Engineering Services to prepare a BEST PRACTICES report for storm water management (Exhibit C). In that report it detailed that the thick layer of crushed stone on top of controlled fill which then sits on the native soil which makes the possibility of any soil erosion unlikely. Further, the report details that the key to keeping up with the best practices is the ongoing inspection and maintenance plan. This is discussed further in Appendix III – Construction.

  As for the foundations, this portion of the D&M plan basically identifies what the foundations will be used for and where they will be located. Essentially, two transformer foundations (each with properly sized oil containment), a control house foundation, and a switchgear foundation were constructed for SNEW. They were built according to design specifications and placed as shown in the proposed plan view of the construction drawings.

  Grading at the site was done in stages with successive layers built up as each portion of the construction required. The appropriate material was brought in for each layer, based on the specifications needed, such as compaction or other required composition. Final grade was done with a minimum of an additional 4 inches of crushed stone and placed so the entire substation yard was substantially level.

EXHIBIT C

STORMWATER BEST MANAGEMENT PRACTICES
SOUTH NORWALK ELECTRIC AND WATER SUBSTATION
180-184 DR. MARTIN LUTHER KING JR. DRIVE
NORWALK, CONNECTICUT

Prepared For:

South Norwalk Electric and Water

August 2013

Prepared By:

LEGGETTE, BRASHEARS & GRAHAM, INC.
Professional Groundwater and Environmental Engineering Services
4 Research Drive, Suite 301
Shelton, CT 06484

APPENDIX III

CONSTRUCTION
D & M Plan – Phase III

- Commencement of Construction: 2/24/2014

- Progress Reports:

  The chart in Exhibit D shows the schedule for the construction of the substation, which was done in a very compact timeline. Our documentation for the start and finish of the overall construction follows very closely to the dates shown above. While exact monthly progress reports are not available, the precise nature of the construction sequence required that the target dates for each individual line item in the chart were virtually started and completed as listed.

- Completion of Construction: 5/25/2014

- Final Report:

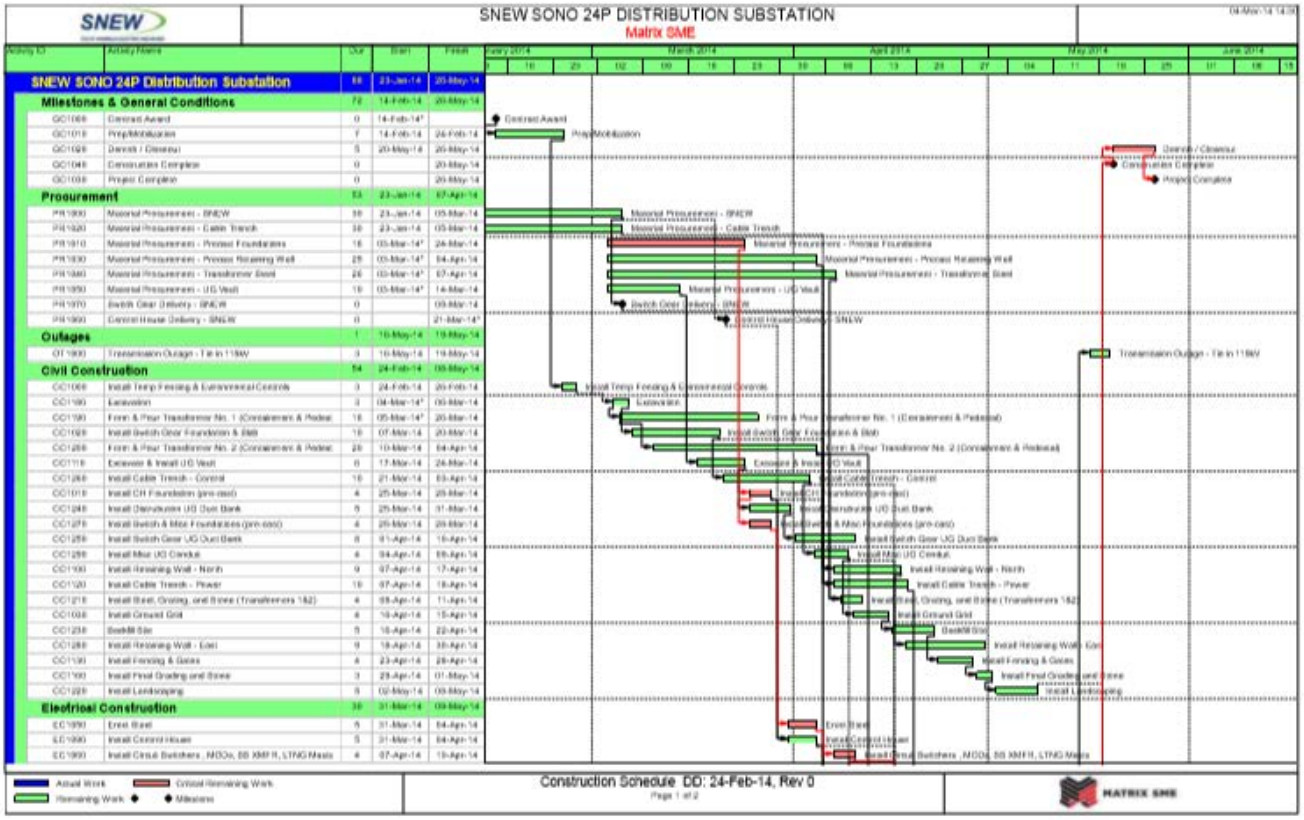
  Exhibit E shows the progress of the construction where the 2 transformer foundation have been completed (except for the crushed stone installation) and the transformers having been placed on them. The 2nd photo shows the placement of the control house and the switchgear building placed on their foundations. These photo shows the completion of the construction phase at approximately the 2/3 point.

  As mentioned in D&M Phase I, the only item not completed as planned was the installation of plastic slats in the fence fabric. When this was proposed, the fence fabric was to be the standard 2" opening. However, due to security requirements for the substation (it is considered critical infrastructure) the fence fabric was changed to a 1" opening to significantly reduce the ability for the fence to be scaled. After extensive research, slats for the 1" opening are not commercially available. See Appendix IV Summary for further discussion.

  Once the substation was commissioned, the Management portion of the D&M plan went into effect. Essentially this detailed all the essential elements for the ongoing inspection and maintenance of the substation. This includes the training of SNEW personnel and its contractors (as necessary) in the proper procedures on accessing the substation and specifically what to look for during the inspections and how to report and then correct any issues that are discovered.

  In every substation entry, by SNEW or any contractor, a general visual inspection is done to ensure that there are no obvious signs of anything amiss. But routinely on a monthly basis, the substation has a thorough inspection of all the components including but not limited to the physical structures and their surroundings, as well as the electrical components and their functionality. Currently we utilize the services of an outside contractor (CE Power located in Wooster, MA) to perform this inspection along with SNEW personnel. They have been performing this service for us since December 2018. Exhibit F shows an example of their monthly report. Generally the items noted are small enough to get corrected prior to the next inspection. Some of the larger and more complex items do take longer to resolve.

EXHIBIT D


SNEW
SNEW SONO 24P DISTRIBUTION SUBSTATION
Matrix SME
Construction Schedule DD: 24-Feb-14, Rev 0
MATRIX SME

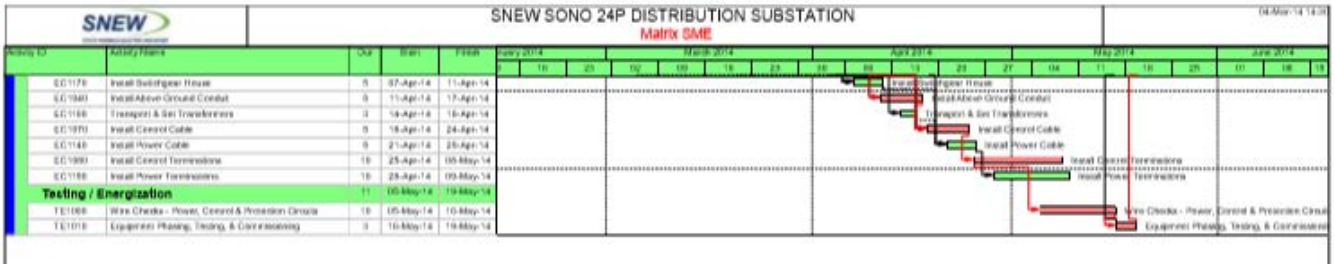

SNEW
SNEW SONO 24P DISTRIBUTION SUBSTATION
Matrix SME

EXHIBIT E

EXHIBIT F

CE POWER
POWER RELIABILITY DELIVERED

40 Washington Street
Westborough, MA 01581

Office: 508-881-3911
Fax: 508-881-4814

August 27, 2020

South Norwalk Electric and Water
1 State Street
Norwalk, CT 06854

Attn.: Mr. Scott Murphy,

Re: Monthly Inspection
SONO24P Substation
Norwalk, CT
CE Power Co.

Dear Mr. Murphy,

CE Power was onsite on August 26, 2020 to perform the planned monthly inspection of SONO24P Substation, located at 175 Dr. Martin Luther King Blvd, Norwalk, CT 06854. The inspection consists of checking the following equipment

- Control house service station
- Battery charger and associated telemetry
- Relay targets and status indication
- Fire extinguishers
- Switchgear enclosure
- Circuit switcher & motor operated disconnect switches
- Transformer load tap changer, liquid level, winding temperature, oil temperature, mini-trans DGA readings, nitrogen level and cooling fans
- The SPCC inspection plan and yard security

Overall, the physical condition of the site and equipment is satisfactory. The transformers fans are working properly. The battery system is performing within range with cell readings ranging from 2.156-2.222V and a total string voltage of 133.0VDC. This value closely matches the battery charger readings of 132.9V and 3.9A. All equipment indicating lights match the equipment status and indicate operational status.

Additional Notes

1. The fire extinguisher in the control house located near the battery bank is due for the annual maintenance inspection.
2. During the line restoration from the storm, The Connecticut Valley Electric Exchange, CONVEX, saw status of 24P-1X3-A-2 breaker as opened while the breaker at SONO24P Substation was in closed position. However, upon restoring the 24P-2X3-A-2 breaker to closed position at SONO24P Substation, CONVEX, also saw 24P-1X3-A-2 breaker status switched to closed. Further investigation is required regarding this issue.

CE POWER
POWER RELIABILITY DELIVERED

40 Washington Street
Westborough, MA 01581

Office: 508-881-3911
Fax: 508-881-4814

Please see the attached reports for August inspection details.

Thank you for allowing CE Power to be of service to your organization. If you have any questions, or if we can provide any further services, please feel free to call our offices at any time.

Sincerely,

Monineath Khun
Engineer I

SON024P MONTHLY SPCC INSPECTION FORM

Facility: SOUTH NORWALK ELECTRIC & WATER SONO 24P SUBSTATION, NORWALK, CONNECTICUT Inspection Date 8/26/2020 Inspection performed by Monineath Khun		24P-1X 5,108 gallons	24P-2X 5,108 gallons	Lead-acid battery storage and loading area	Access Driveway and Yard	Fences, Gates and Retaining Walls	Comments and Corrective Action
Complete questions 1-4 for each transformer and complete questions 5-9 for the remaining items. Use additional sheets as needed. If the questions are answered with "Not OK" or "Yes", then SNEW Management shall address the issue(s) in a timely manner.							
1	Perform a visual inspection of the transformer, the secondary containment and surrounding ground to identify leaks, stains or spills.	☑OK ☐Not OK	☑OK ☐Not OK				
2	Open the hatch in the corner of the moat and inspect for liquid. Is there more than **12 inches of liquid** or is there oil, an oil sheen or oily water present	☐Yes ☑No	☐Yes ☑No				
3	With the hatch still open, is there more than **12 inches of sediment** in the moat?	☐Yes ☑No	☐Yes ☑No				
4	Does the SCADA monitoring system indicate operational issues?	☐Yes ☑No	☐Yes ☑No				
5	Good Housekeeping maintained (Control & Switchgear Houses) Station Yard			☑OK ☐Not OK ☐ N/A	☑OK ☐Not OK ☐ N/A	☑OK ☐Not OK ☐ N/A	
6	Any leaks, stains, spills or damage.			☐Yes ☑No	☐Yes ☑No	☐Yes ☑No	
7	Any signs of erosion or foundation washout			☑OK ☐Not OK ☐ N/A	☑OK ☐Not OK ☐ N/A	☑OK ☐Not OK ☐ N/A	
8	Are lights working (Exterior & Interior)			☑OK ☐Not OK ☐ N/A	☑OK ☐Not OK ☐ N/A	☑OK ☐Not OK ☐ N/A	
9	Do spill supplies need to be replenished? Does waste from spill cleanup activities need to be removed?			☐Yes ☑No	☐Yes ☑No	☐Yes ☑No	

APPENDIX IV

SUMMARY

SNEW believes that it has complied with the intent of its application to the Connecticut Siting Council for a Certificate of Environmental Compatibility and Public Need for the construction of its electrical substation at 180 Martin Luther King Jr. Drive, Norwalk, CT. This specifically includes all aspects of the Development & Management Plan and most importantly, the ongoing inspection and maintenance plan. The singular exception to the Plan is that the installation of privacy slats in the chain link fence surrounding the substation was not performed.

SNEW is asking for relief of this requirement of the D&M plan, specifically the insertion of slats in the substation fencing. This is briefly covered in APPENDIX I & III of this document. This Summary provides the details to support our request. If the fence fabric had remained at the standard 2" opening, SNEW simply would have complied and installed the slats. However, the change in fence fabric to a high security type (NERC-CIP requirement) makes it impossible to install the proposed slats in the fence fabric. After extensive research, there is no manufacturer of fence slats that will fit in the 1" opening of the high security fence fabric. The industry standard is for a 2" opening and that is all that is commercially available and none of the manufacturers that we contacted would consider making a custom production run in the reduced size.

The D&M plan called for the fence slats on the north east and west sides of the substation. The south side was exempted because it was bordered by a commercial / industrial property (United Parcel Service) and also the existence of a 30 foot wide tree line buffer. The landscape screening installed on the north and east sides (also specified in the D&M Plan) makes the slats non-essential to the screening of the property on these sides. This landscaping essentially provides the visual screening that the slats would have provided. Each of these 3 sides are discussed individually and shown pictorially.

On the north side, the row of arborvitaes along the fence line are planted close enough and tall enough to obstruct the view into the substation and provide the necessary visual barrier. In addition, there are no businesses or houses bordering the north side of the property and the curve in the roadway of Martin Luther King, Jr. Drive, makes this portion of the property the least visible. See EXHIBIT G.

On the west side, adjoining the railroad tracks, the natural plant growth has since recovered from the site construction to provide screening to at least the height of the fence for the portion of the fence line controlled by SNEW. The only open spot is on the west side is along the Eversource controlled portion where their transmission facilities are located. The height of these facilities are significantly higher than the fence line, so the installation of slats in this area would not effectively provide any screening. However, effective screening is provided by the tall tree line along the west side of the railroad tracks. The businesses and houses on Bouton St. are thus provided with a visual barrier. See EXHIBITS H & I.

On the east side, this is the side of the substation that is most visible to the general public. However, there are no businesses or houses bordering the east side of the property so the only view of the substation is from the moving traffic on Martin Luther King, Jr. Drive. The planting of arborvitaes and cherry trees effectively provides significant visual screening particularly for the static portions of the fence. This is the side of the substation that provides the access, so the plantings do not cover the gates. Again, this is not a significant issue as the view into the substation is only momentary and based on the speed of the passing traffic. Finally, there is a tall tree line on the east side of the roadway which provides screening of any view of the entire substation to the houses on Laura St (the next adjoining street). See EXHIBITS J, K, & L.

In conclusion, SNEW believes that maintaining the existing landscaping and vegetation screening is the optimum solution. It provides equal or superior screening of the substation and the landscaping is already part of our monthly inspection and maintenance plan. Therefore, SNEW requests that the original requirement for installing slats in the fence fabric be eliminated in favor of maintaining shrubs and the natural growth around the substation perimeter.

EXHIBIT G

CURRENT VIEW OF THE NORTH FENCE LINE

EXHIBIT H

VIEW OF THE NORTHWEST CORNER DURING CONSTRUCTION & EXISTING CONDITIONS

EXHIBIT I

CURRENT VIEW OF WEST SIDE OF RAILROAD TRACKS

EXHIBIT J

CURRENT VIEW OF EAST SIDE OF SUBSTATION

EXHIBIT K

CURRENT PARTIAL VIEW OF EAST SIDE OF SUBSTATION

EXHIBIT L

CURRENT VIEW OF EAST SIDE OF MLK Jr. DRIVE