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December 26, 2024

VIA HAND DELIVERY

Melanie A. Bachman, Esq.  
Executive Director  
Connecticut Siting Council  
10 Franklin Square  
New Britain, CT 06051

Re: Docket No. 490 - The United Illuminating Company application for a Certificate of Environmental Compatibility and Public Need for the Old Town Substation Rebuild Project that entails construction, maintenance and operation of a 115/13.8- kilovolt (kV) air-insulated replacement substation facility located on the existing Old Town Substation parcel at 282 Kaechele Place and two parcels immediately north totaling approximately 3 acres that are owned by the United Illuminating Company at 312 and 330 Kaechele Place, Bridgeport, Connecticut, and related transmission structure and interconnection improvements.

Dear Ms. Bachman:

Pursuant to Condition 1 of the Connecticut Siting Council's ("Council") January 28, 2021 Decision and Order regarding the Old Town Substation Rebuild Project ("Project"), The United Illuminating Company ("UI") hereby submits to the Council for review and approval the Project's Development and Management Plan ("D&M Plan") which has been prepared in compliance with Sections 16-50j-60 through 16-50j-62 of the Regulations of Connecticut State Agencies. An original and fifteen (15) copies of this filing will be hand delivered to the Council.

Should you have any questions regarding this letter, please do not hesitate to contact me.

Very truly yours,

A handwritten signature in blue ink, appearing to read "Bruce L. McDermott".

Bruce L. McDermott

Enclosure

cc: Docket 490 Service List

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# **DEVELOPMENT & MANAGEMENT PLAN**

*for the*

## **OLD TOWN SUBSTATION REBUILD PROJECT**

**(Connecticut Siting Council Docket No. 490)**

**City of Bridgeport  
Fairfield County, Connecticut**

### **VOLUME 1: TEXT AND APPENDICES**

**December 2024**

*Prepared By:*

**THE UNITED ILLUMINATING COMPANY**

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### **VOLUME 2: MAPS AND DRAWINGS**

- Overview and Key Maps
- Substation Site Plans and Engineering Drawings, including Decommissioning Plan Drawing for Existing Old Town Substation
- Permanent Access Road: City of Bridgeport Property
- Landscape Plan

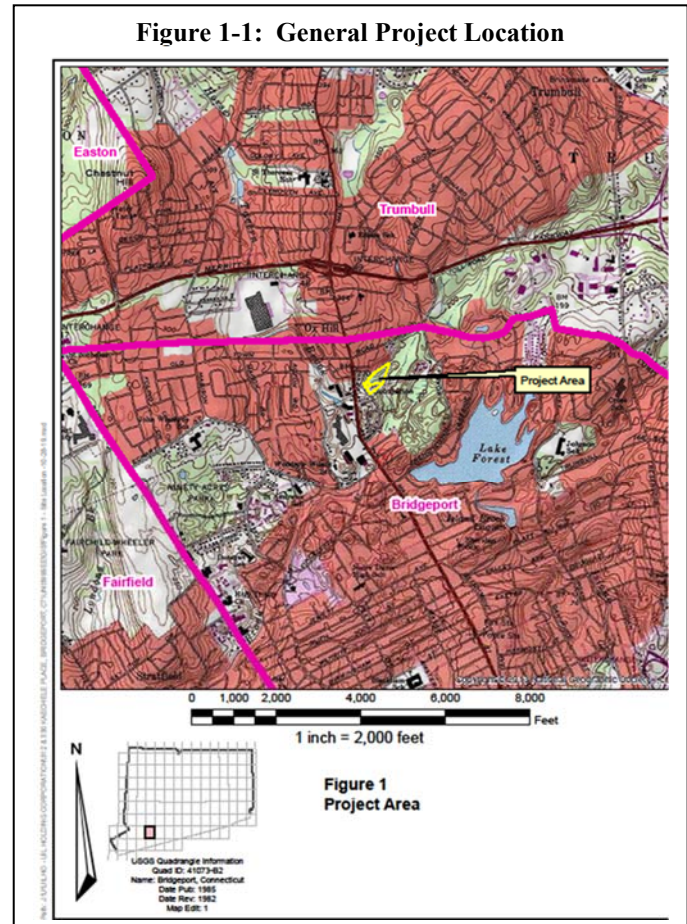
## 1. INTRODUCTION

### 1.1 PROJECT OVERVIEW AND NEED

To improve the reliability and resiliency of the bulk electric system in Connecticut, and in particular the Greater Bridgeport area, The United Illuminating Company (UI or the Company) is rebuilding its existing Old Town Substation, a 115/13.8-kilovolt (kV) transmission and distribution facility that provides electric service to the Greater Bridgeport area. The existing air-insulated substation (AIS), which was built in the early 1960s, occupies an approximately 0.9 acre portion of a 3.9-acre UI-owned property. The existing substation is located at 280 Kaechele Place, in the northwestern portion of the City of Bridgeport. The remaining 3 acres of UI's property (located at 312 and 330 Kaechele Place, also in Bridgeport), are undeveloped and adjoin and are located north and east of the existing substation (refer to Figure 1-1). Kaechele Place, which connects to Main Street (State Route 111) provides access to the existing substation and adjacent UI property. Lands in the vicinity of the UI property include commercial uses along Main Street, some residential uses to the south along Kaechele Place and to the north along Sequoia Road, and undeveloped open space within the City of Bridgeport's Elton Rogers Woodland Park, which abuts the Company's property to the east and south.

Old Town Substation is geographically located to feed the electric distribution capacity needs of the City of Bridgeport, as well as the neighboring towns of Easton, Fairfield, and Trumbull. Three overhead 115-kV transmission lines (the 1222, 1710, and 1222 lines) owned by The Connecticut Light and Power Company d/b/a Eversource Energy (Eversource) occupy an approximately 80-foot-wide Eversource right-

**Figure 1-1: General Project Location**





of-way (Eversource ROW) that extends east-west through the southern portion of the existing substation.<sup>1</sup> Two of the Eversource 115-kV lines (the 1710 and 1222 lines) connect to the Old Town Substation, while the 1714 Line bypasses the substation.

Within and adjacent to the substation, these transmission lines are supported on two approximately 105-foot-tall lattice steel structures. One lattice structure (Eversource Structure 857, supporting the 1710 and 1714 lines) is located directly outside the southeast corner of the existing substation, while the other Eversource lattice structure (Structure 857.5, supporting the 1222 and 1714 lines) is situated inside the substation. Figure 1-2 provides an aerial view of the existing and proposed substation, along with the Eversource ROW and general surrounding land uses.

**Figure 1-2: Aerial View of Existing and Planned Old Town Substation Location**



<sup>1</sup> Eversource's 1714 and 1710 lines extend to the substation from the east. The 1710 Line, which connects to Eversource's Devon Substation in the City of Milford and UI's Pequonnock Substation in southeastern Bridgeport, terminates at Old Town Substation. The 1222 Line extends west from Old Town Substation, sharing an Eversource ROW with the 1714 Line. The 1714 Line links UI's Trumbull Substation (located to the east of Old Town Substation) and Eversource's Weston Substation (located to the west in the Town of Weston), whereas the 1222 Line connects Old Town Substation to UI's Hawthorne Substation in the Town of Fairfield.

The substation steps down power delivered from these transmission lines to feed UI's local distribution system. In addition, the substation has distribution feeder ties with other UI substations (i.e., the Pequonnock and Congress Street substations in Bridgeport, the Hawthorne Substation in the Town of Fairfield, and Trumbull Substation in the Town of Trumbull), allowing for load transfers between these stations.

UI is replacing the existing Old Town Substation because it does not conform to current industry system performance standards and Company requirements for maintaining adequate, safe, and reliable service. The Old Town Substation Rebuild Project (the Project) involves the construction, operation, and maintenance of a new 115/13.8-kV transmission and distribution substation, to be built on the adjacent, undeveloped UI property, as well as the decommissioning and removal of the existing substation facilities. The new substation will meet current National Electrical Safety Codes (NESC) and UI standards. Once completed, the rebuilt substation will encompass the existing substation site.

Overall, the new substation will occupy a fenced area of approximately 2.25 acres, consisting of the 0.9-acre existing substation parcel and approximately 1.35 acres of the adjacent 3-acre UI property. The remaining approximately 1.63 acres of the 3-acre site will remain undeveloped.

## **1.2 PURPOSE OF THE D&M PLAN**

On June 30, 2020, UI submitted to the Connecticut Siting Council (CSC, Council) an Application for a Certificate of Environmental Compatibility and Public Need for the construction, operation, and maintenance of the Project (CSC Docket No. 490). After holding public meetings and an evidentiary hearing, on January 28, 2021, the Council issued a Decision and Order approving the Project.

The CSC's Decision and Order includes 13 Project-specific conditions. Condition No. 1 of the Council's Decision and Order requires that UI prepare a Development and Management Plan (D&M Plan), in compliance with Sections 16-50j-60 through 16-50j-62 of the Regulations of Connecticut State Agencies (RCSA).<sup>2</sup> Condition No. 1 also defined five specific plans, procedures, and other information (Conditions 1.a - 1.e) that must be included in the Project's D&M Plan.<sup>3</sup>

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<sup>2</sup> The overall purpose of a D&M Plan is to provide construction details (such as plans, maps, and drawings) that define the methods and procedures to be used during the construction and operation/maintenance of energy facilities, balancing the need for adequate and reliable utility service with the protection of the environment.

<sup>3</sup> Condition No. 2 of the Council's Decision and Order requires Eversource to prepare a Partial D&M Plan, focusing on the transmission line structures to be replaced to connect to the rebuilt Old Town Substation. Eversource's Partial D&M Plan will be provided to the CSC separately; Eversource expects to file its Partial D&M Plan before the end of June 2025.



This D&M Plan conforms both to Condition No. 1 of the Council's Decision and Order and to Sections 16-50j-60 through 16-50j-62 of the RCSA (*Requirements for a D&M Plan, Elements of a D&M Plan, Reporting Requirements*). Further, the Plan incorporates, as applicable, other Project-specific UI commitments contained in UI's Application to the CSC or UI's responses to the CSC during the Application review process.

In addition, the D&M Plan reflects UI's standard protocols for substation construction, operation, and maintenance, as well as commitments made in the Company's submissions to other Federal and State regulatory agencies, including the U.S. Army Corps of Engineers (USACE), U.S. Fish and Wildlife Service (USFWS), Connecticut Department of Energy and Environmental Protection (CT DEEP), and the State Historic Preservation Office (SHPO).

### 1.3 SUMMARY OF PROJECT UPDATES

The technical information contained in the D&M Plan incorporates updates to the Project design, reflecting the more detailed engineering studies that UI performed subsequent to the issuance of the CSC's January 28, 2021 Decision and Order. These updates include the following:

1. **Substation Boundary Fence.** The northern, eastern, and western boundaries of the new substation fence were shifted to minimize impacts to adjacent properties and drainage patterns, as well as to better accommodate the final substation design (e.g., access, location of Eversource replacement structures). These modifications include:
  - a. Northern Boundary. The retaining wall along the northern property line, adjacent to the funeral home, was shifted south to provide additional space between the substation fence and adjacent private property (a funeral home). This shift also allows for UI vehicular access outside the northern fence and also will maintain an existing drainage swale along the base of the funeral home's stone retaining wall (the funeral home property is at a higher elevation than the substation property).
  - b. Eastern Boundary. The eastern fence was shifted to the west, thereby minimizing impacts to a wetland and intermittent stream, both located outside the northeastern corner of the planned retaining wall.
  - c. Western Boundary. The western fence (adjacent to Kaechele Place) was shifted to the east (away from the road) to:
    - Allow ample vehicular parking in a driveway while unlocking and opening the gates to enter the substation yard.
    - Provide space to accommodate the leach field for the substation septic system.
    - Allow the proper alignment for an emergency mobile substation to enter the substation yard, if necessary.
    - Provide space for Eversource's two replacement monopoles for Structure 857.5 to be located outside the western substation fence, adjacent to Kaechele Place.

2. **Transformers.** Two 115/13.8-kV 45/60/75 megavolt ampere (“MVA”) power transformers will be installed as detailed in the CSC Application. As also discussed in the CSC Application, UI’s initial substation design included space for the later installation of a third, similarly sized transformer, if needed for future demand. However, recent load studies determined that a third power transformers will not be necessary. As a result, compared to the original substation design, the two new power transformers will be positioned closer together and more toward the center of the rebuilt substation.
3. **Landscaping and Fence.** The rebuilt substation fence will include screening panels as described in the CSC Application. However, given the modifications to the final fence design, only limited areas are available for landscaping. Appropriate landscaping will be installed outside the western fence along Kaechele Place.

## 1.4 D&M PLAN ORGANIZATION

The D&M Plan consists of two volumes:

- **Volume 1** describes the new substation facilities and provides information relevant to the construction of the Project, including technical specifications; Project construction management, laydown/staging areas, and environmental inspection; substation construction procedures and details (e.g., site preparation, equipment installation, testing and commissioning, cleanup and restoration, and site security); a decommissioning plan for the existing substation; environmental resources and mitigation; schedule and work hours; permits and approvals; outreach; and notices and reports to be provided to the CSC.

Appendices to Volume 1 include:

- Appendix A: Erosion and Sedimentation Control Plan, pursuant to Condition 1.b of the Council’s Decision and Order.
  - Appendix B: Spill Prevention and Control Plan, pursuant to Condition 1.c of the Council’s Decision and Order.
  - Appendix C: CT DEEP Best Management Practices for Disposal of Snow Accumulations from Roadways and Parking Lots.
  - Appendix D: D&M Plan Checklist for the Project (identifying the sections of the D&M Plan that address each of the applicable requirements of RCSA Sections 16-50j-60 through 16-50j-62 and
- **Volume 2** includes Project maps and drawings, including the final Old Town Substation site plan showing the placement of all substation equipment, structures and buildings within the substation perimeter, access, the landscaping plan, and boundary fencing (pursuant to Condition No. 1.a of the Council’s Decision and Order), details of the transmission line interconnections to the rebuilt substation, and a decommissioning drawing plan for the existing Old Town Substation (pursuant to Condition 1.e of the Decision and Order).

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## **2. DESCRIPTION OF PROJECT FACILITIES**

The rebuilt Old Town Substation will consist of new facilities to directly replace and upgrade all the existing 115-kV and 13.8-kV components at the existing substation. The new substation will occupy approximately 2.25 acres and will encompass the 0.9-acre site of the existing Old Town Substation. The alignment of the existing Eversource ROW through the UI property will not be affected.

The design of the new Old Town Substation meets or exceeds all State building and fire codes, including provisions for seismic loading, wind loading, and snow/ice loading.

### **2.1 REBUILT SUBSTATION FACILITIES**

The new 115-kV AIS substation will be designed in a two-transmission line, single-breaker arrangement, expandable to a two-bay breaker and one-half arrangement, with two 45/60/75 MVA, 115/13.8-kV power transformers, as well as space for a future 115-kV capacitor bank, if deemed necessary. The substation will include new 115-kV and 13.8-kV switchyard equipment, a new control enclosure and 13.8-kV switchgear enclosure, as well as modifications to the 115-kV overhead transmission lines and optical ground wire (OPGW) fiber optic cables along with 13.8-kV distribution system connections.

Table 2-1 lists the primary equipment and facilities at the new Old Town Substation. The site plan drawings in Volume 2 illustrate the layout of the substation.

A 14-foot-tall chain link fence with privacy slats, topped with an additional 1 foot of barbed wire, will be installed around the substation perimeter. To accommodate the existing site topography and minimize grading to the extent practical, a concrete retaining wall will be built around the northwestern, northeastern, and southeastern portions of the substation perimeter.

The chain link fence will be installed on top of the retaining wall. The site plan in Volume 2 illustrates the location of the perimeter fence and retaining wall.

**Table 2-1: New Old Town Substation: Primary Equipment List**

- Approximately 3,840 square-foot control enclosure and 13.8-kV switchgear enclosure, with approximate dimensions of 16 feet in height by 120 feet long by 32 feet wide and including following components:
  - Protection and control panels with associated relay and metering equipment
  - Battery banks and associated chargers
  - AC/DC distribution panels
  - Lavatory facility
  - Communication equipment
  - HVAC equipment
  - The switchgear room will accommodate construction of four new lineups of indoor 13.8-kV Gas Insulated Switchgear, separated with space for future additions
- Two 115/13.8-kV 45/60/75 MVA power transformers
- Three 115-kV SF6 dead tank circuit breakers
- 115-kV disconnect switches
- CCVTs
- Associated 115-kV insulators, tubular aluminum bus, surge arrestors, and connectors
- Provisions to accommodate a temporary mobile transformer for emergency conditions
- Lightning masts
- Associated structural steel to support electrical equipment

## 2.2 TRANSMISSION LINE CONNECTIONS AND REBUILDS

Volume 2 includes drawings that illustrate the locations of the existing and new transmission line connections. Nine new tubular galvanized steel monopoles will be installed to support the 115-kV transmission lines within and adjacent to the rebuilt substation:

- Eversource’s two existing double-circuit lattice steel structures (existing Structure Nos. 857 and 857.5) will be replaced with four single-circuit monopoles, each approximately 105 feet tall. These four new monopoles will be located within the Eversource ROW: two on the Eversource ROW to the east of the substation and two directly outside the western substation fence, adjacent to Kaechele Place (refer to the site plans in Volume 2).<sup>4</sup> Eversource’s Partial D&M Plan, provided separately, will include details regarding these structure rebuilds.
- Five UI monopoles, all within the rebuilt substation boundaries and between 80 and 100 feet tall, will support the 115-kV line connections to the new substation, as well as the 1714 Line realignment through the substation yard. UI will coordinate the transmission line modifications with Eversource. The five monopoles will support the 1590 aluminum conductor steel supported (“ACSS”) transmission line connections to the substation. Optical Ground Wire (“OPGW”) on the lines will be 144 fiber.

<sup>4</sup> Eversource’s two single-circuit replacement monopoles east of the substation will consist of Structure 857 (supporting the 1714 Line) and Structure 857A supporting the 1710 Line. The single-circuit replacement monopoles west of the substation fence will include Structure19700, supporting the 1714 Line and Structure19700A, supporting the 1222 Line.

The two Eversource transmission lines (the 1710 and 1222 lines) that presently terminate at the existing substation will be modified, rerouted to the north side of the UI property, and connected to line terminals at the new substation. The third Eversource transmission line (the 1714 Line), which bypasses the existing substation, will be re-routed and connected to the takeoff structures within the fenced substation. The 1714 Line will continue to bypass the new substation; however, the new substation is designed to facilitate a future interconnection to this 115-kV line, if required.

### **2.3 EASEMENTS AND ACCESS**

The new Old Town Substation will be accessible via two separate gated entrances/exits directly from Kaechele Place (refer to the Volume 2 site plan). A grassed access way / drainage also will be maintained, on UI property, to provide ingress/egress outside the northern substation fence line, if needed for maintenance of the fence or retaining wall.

In addition, an approximately 14-foot-wide permanent gravel access road will be established, following an existing accessway that extends from Kaechele Place, across City of Bridgeport property, directly south of the substation. The permanent gravel access road will provide ingress/egress to the UI property, as well as to Eversource's ROW outside the southeastern substation fence line. UI, Bridgeport, and Eversource agreed to the establishment and use of the permanent access road as described in the "Three Party Agreement for a Permanent Access Easement for Construction and Maintenance in favor of United Illuminating", which was approved by the Bridgeport Board of Parks Commission in September 2024, and by the Bridgeport City Council and Bridgeport Contracts Committee in December 2024. Under the easement agreement, Bridgeport grants UI 28,149 square feet of permanent easement for operations and maintenance purposes; within this easement area, UI, in turn, grants Eversource a 5,004-square-foot access easement from Kaechele Place to the Eversource ROW. Drawings that depict the easement area, including the location and width of the permanent access road, are included in Volume 2.

### **2.4 UI-EVERSOURCE FACILITIES OWNERSHIP**

After the rebuilt substation is placed in-service, the point of change in ownership for the 1222 and 1710 lines, as well as the potential future interconnection with the 1714 Line, will be established at the Eversource-owned steel monopoles located within the Eversource ROW (Structures 857/857A and 19700/19700A. Specifically, Eversource will own the monopoles, insulators, conductor loop, and hardware attached to the monopoles. UI will own the monopoles, conductor, and associated equipment located within the substation fence line. All the replacement monopoles will be located within Eversource's existing ROW, outside the new Old Town Substation fence.

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### **3. CONSTRUCTION MANAGEMENT, SUPPORT AREAS, AND ENVIRONMENTAL INSPECTION**

#### **3.1 UI PROJECT MANAGEMENT AND CONTRACTOR CONTACT INFORMATION**

UI will oversee all Project construction, monitoring the construction contractors' work for conformance to this D&M Plan, UI specifications, and any other applicable safety, engineering, and environmental requirements. The names and contact information for the key UI personnel who will be responsible for managing the Project will be provided to the Council prior to the start of construction, along with the contact information for the Project's construction contractor, the contractor's spill response contractor, and the City of Bridgeport Emergency Management Services.

#### **3.2 CONTRACTOR YARD AND CONSTRUCTION SUPPORT AREAS**

Portions of the UI property (i.e., the existing substation and planned rebuilt substation site) will be used for Project construction support and material storage. However, to support the overall Project construction, an off-site contractor yard / staging area will be required for material laydown and staging, parking for personal vehicles and contractor equipment, construction office trailers, and temporarily storing both the components to be installed at the new Old Town Substation and the materials that will be removed when the existing substation is dismantled.

UI's primary contractor for the Project will be responsible for identifying and establishing this contractor yard / staging area. Prior to the use of this contractor yard / staging area, UI will submit the information regarding the location and size of this area to CSC staff for review and approval.

In general, the Project contractor yard / staging area is expected to be used to:

- Store Project construction materials, equipment, tools, fuel, and supplies (including conductors, insulators, hardware, poles and construction mats);
- Park construction vehicles and equipment, as well as the personal vehicles of construction personnel;
- Perform minor maintenance on construction equipment;
- Store and assemble transmission line structure components;

- If necessary, stage fractionization (frac) tanks for water storage or treatment prior to off-site discharge or disposal.
- Store temporarily the old substation components removed during the work prior to off-site removal and/or disposal; and
- Refuel, if necessary, construction vehicles and equipment.

In addition, temporary office trailer(s), CONEX storage boxes, a generator (if necessary to provide power for on-site activities), and portable restrooms will be established at the contractor yard/staging area. As appropriate, erosion and sedimentation controls will be installed at the contractor yard/staging area; these controls will be maintained until the contractor completes the Project work and demobilizes from the yard.

### **3.3 COORDINATION WITH EVERSOURCE**

UI meets regularly with Eversource to discuss the Project and worked closely with Eversource to obtain the permanent easement, across Bridgeport property, from Kaechele Place to the Eversource ROW. UI will continue to coordinate with Eversource throughout the construction of the Project, particularly regarding Eversource's structure replacement work adjacent to and within the rebuilt substation.

### **3.4 ENVIRONMENTAL INSPECTION**

UI will assign a UI environmental inspector/monitor to perform routine inspections of the Project.<sup>5</sup> The purpose of the inspections will be to confirm compliance with this D&M Plan, UI commitments and standard protocols. The environmental inspector/monitor will:

- Conduct field inspections at least weekly or potentially more often, depending on the Project construction activities and compliance with State or Federal permit obligations. The field inspections will be targeted to monitor conformance to the D&M Plan, Contractor Material Handling Plan, as well as Project approvals from the USACE, Connecticut State Historic Preservation Office (SHPO), and CT DEEP. Environmental areas that will be covered in the inspections include vegetation removal, water resources (wetlands, watercourses), dewatering, soil erosion and sedimentation controls, threatened/endangered species avoidance/mitigation, wetland invasive species control, spill prevention/control, air quality/dust suppression, noise, materials and waste management, and site restoration.
- Prior to the start of Project construction provide, as necessary, awareness training for construction contractor personnel regarding conformance to environmental requirements.
- Coordinate closely with UI environmental and Project management, as well as with UI's construction manager and the contractor.

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<sup>5</sup> Construction includes all tasks related to UI's Project construction, extending through site stabilization and restoration. Eversource's environmental inspection program will be discussed in its Partial D&M Plan.

- Attend, as necessary, regular Project construction meetings and provide input regarding environmental inspection results and pro-actively work with the construction team to identify any environmental resource areas of concern based on contractor “look ahead” schedules.
- Provide guidance to the construction contractor, as needed, regarding environmental impact avoidance methods.
- Prepare internal field monitoring reports. Any issues of potential concern (e.g., erosion and sediment controls that require maintenance) will be conveyed to the UI construction manager and construction contractor at the time of the field inspection, thereby allowing for a prompt resolution.

In addition, UI will hire a third-party inspector to monitor conformance with the Project’s Stormwater Pollution Control Plan (SWPCP), which was prepared pursuant to requirements of the CT DEEP’s *General Permit for the Discharge of Stormwater and Dewatering Wastewaters from Construction Activities* (General Permit) and approved by CT DEEP on Nov. 4, 2024, under Permit No. GSN004119. Accordingly, the SWPCP inspector/monitor will meet the criteria and experience as specified in the General Permit for a Qualified Inspector.

The SWPCP inspector will monitor conformance to the SWPCP, principally erosion and sedimentation control measures, water resource protection, and site stabilization; however, the areas covered by the SWPCP inspections overlap with those covered by the D&M Plan monitoring. Among other activities as specified in the General Permit and the SWPCP, the inspector will:

- Perform an initial inspection within 30 days of the commencement of construction activities and at least three times within the first 90 days of construction to confirm compliance with the General Permit and proper implementation of control measures designated in the SWPCP.
- Conduct routine inspections of Project site pursuant to the SWPCP checklist.
- Perform inspections after qualifying rain events, as defined in the General Permit and the schedule presented in the Project SWPCP.
- Convey any issues regarding soil erosion and sedimentation controls promptly to the UI construction manager.
- Coordinate with the UI construction manager and contractor, as necessary, to assess whether additional or different types of erosion/sedimentation controls are needed.
- Document the results of the routine and rain event inspections on standard SWPCP inspection forms.

- Inspect site stabilization and restoration, coordinating with UI and the construction contractor to determine when temporary erosion and sedimentation controls must be maintained until stabilization is achieved and when such controls can be removed thereafter.
- Maintain SWPCP records, including contractor certification regarding the review of the SWPCP and a Record of Revision documenting changes to the SWPCP subsequent to approval by CT DEEP. UI will maintain the SWPCP records for five years following the completion of construction, as required by the General Permit.
- Perform post-construction inspections as required pursuant to the General Permit, including an inspection after all Project activities are completed to confirm that the areas affected by the Project remain stable. The final inspection will be conducted after the Project site has achieved final stabilization for at least one growing season after the completion of construction (as defined by the General Permit<sup>6</sup>). After the inspector determines that the Project areas have been stabilized, UI will submit a Notice of Termination to CT DEEP to close out the General Permit for the Project.

UI's environmental group will maintain copies of all monitoring and SWPCP and other inspection forms. These forms will be available upon request.

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<sup>6</sup> The growing season is defined as April-October, with seeding seasons within that time period consisting of April 1 to June 15 and August 15 to October 1. The growing season consists of both seeding seasons.

## **4. CONSTRUCTION PROCEDURES**

UI will construct, operate, and maintain the new Old Town Substation in full compliance with the latest revisions of standards of the NESC, the Institute of Electrical and Electronic Engineers (IEEE) and the American National Standards Institute (ANSI); good utility practice; and UI's specifications, final engineering plans, and the conditions of regulatory approvals obtained for the Project. Table 4-1 summarizes the general sequence of activities for the construction of the new substation and the relocation of the associated 115-kV lines. During construction, primary access to the Project site will be via Main Street to Kaechele Place.

### **4.1 STANDARD SUBSTATION CONSTRUCTION PROCEDURES**

#### **4.1.1 Site Preparation**

Site preparation work consists of vegetation clearing (including tree removal), as well as grading and filling.

##### **Vegetation Clearing**

On the existing UI property to be used for the new Old Town Substation, shrub vegetation as well as approximately 60 trees greater than 6-inch diameter at breast height (dbh) will be cleared. The forest vegetation consists of approximately 2.30 acres of clearing in forested uplands and 0.015 acre in the western portion of an approximately 0.49-acre wetland that is located on the northeastern portion of the UI property.

In addition, on the easement area within Elton Rodgers Woodland Park, it is estimated an additional 10 trees greater than 6-inch dbh will be removed to provide clearance for the relocated overhead 115-kV transmission line connections to the substation. The trees to be removed are primarily deciduous species (maple, ash, oak, and beech) with some conifers intermixed.

Trees outside of the proposed substation footprint will be preserved, except as necessary for construction workspace and to maintain required clearances for the safe operation of electric equipment and transmission lines. In total, approximately 0.30 acres of forested vegetation will be cleared within the easement area.

**Table 4-1: General Project Construction Sequence**

| <b>TYPICAL CONSTRUCTION ACTIVITIES</b>  |  |
|---|--|
| <b>Substation</b>   |  |
| • Clear vegetation, including trees, install perimeter fencing and install erosion and sedimentation controls as applicable   |  |
| • Prepare the site for development (fill, grading, bedrock removal) and construct retaining wall; re-install or install erosion and sediment controls around areas of disturbed soil, as needed |  |
| • Install control room foundation, substation equipment foundations, conduits, grounding grid, site drainage and distribution facilities  |  |
| • Install overhead transmission line structure foundations  |  |
| • Install control and distribution equipment enclosure  |  |
| • Install control and distribution equipment inside control enclosure   |  |
| • Install underground 13.8-kV duct banks and yard control trench  |  |
| • Install finished sub-grade and surface stone  |  |
| • Offload and install power transformers  |  |
| • Install 13.8-kV switchgear in the control enclosure; steel structures and outdoor substation equipment  |  |
| • Install permanent fence and asphalt access drive  |  |
| • Pull and terminate control wiring   |  |
| • Install 115kV overhead transmission line conductors and equipment   |  |
| • Commission/test the substation  |  |
| • Perform 115-kV circuit by circuit transmission line cutovers; perform 13.8-kV circuit by circuit distribution line cutovers   |  |
| • Complete site restoration activities; remove temporary erosion and sedimentation control measures after site stabilization is achieved  |  |
| • Decommission old substation   |  |
| <b>Transmission Line Connections</b>  |  |
| • Locate and mark utilities, stake work area boundaries   |  |
| • Establish erosion and sedimentation controls; prepare access and work pads to the structure locations   |  |
| • Install new structure foundations and assemble/erect new structures   |  |
| • Install conductors, shield wire, and OPGW on relocated transmission line connections  |  |
| • Remove structures, conductors, shield wire, and OPGW from the existing line connections to the old substation   |  |
| • Energize the line connections in conjunction with new substation energization   |  |
| • Remove temporary construction access and work pads, and restore/stabilize areas affected by construction  |  |
| • Maintain erosion and sedimentation controls until area affected by construction are stabilized  |  |

Clearing will typically be accomplished using conventional mechanical methods, using a combination of mowing, chain saws, hand labor, and mechanized equipment. Vegetation removal activities generally will require flatbed trucks, brush hogs or other types of mowing equipment, skidders, forwarders, bucket trucks, feller bunchers for mechanical tree cutting, woodchippers, log trucks, and chip vans. Vegetation removal will be performed in accordance with UI procedures, as follows:

- Where practical, brush will be cut close to the ground, leaving root systems and stumps, to retain soil stability.
- Trees will be directionally felled to minimize impacts. Grubbing will be performed where necessary.
- Crews will use matting, comprised of timber or composite materials in the wetland areas where vegetation clearing is required. Such temporary support will minimize rutting in wetlands and will be removed after the clearing activities are completed.
- In the wetland, trees and brush will be cut flush with the ground surface and the stumps will be left in place unless removal is required for Project construction. All other cut vegetation will be removed from wetland areas; no temporary stockpiling of cut materials is allowed in the wetland.
- Low-impact clearing methods will be employed, as necessary, to protect water resources. Such methods may involve maximizing the use of uplands for clearing in the wetland, manually clearing vegetation, and taking into consideration weather and soil conditions when scheduling vegetation clearing (e.g., avoiding work during periods of heavy rainfall).

UI's contractor will be responsible for properly stockpiling temporarily and ultimately arranging for the appropriate disposition or reuse of any vegetative materials cut from the Project area in accordance with existing regulations.

### **Grading and Filling**

Because of the varied topography on the Project site, significant grading and filling will be required. To minimize the amount of grading required, a concrete retaining wall, approximately 700 feet in length and ranging in height from approximately 2 to 10 feet (depending on cut and fill requirements), will be built around portions of the substation perimeter (refer to the Volume 2 maps and drawings).

However, even with the retaining wall, approximately 5,700 cubic yards of material will be cut and 7,400 cubic yards of fill will be required to bring the site to final grade for the new substation. An estimated 15,670 cubic yards of bedrock excavation will also be required. Grading and filling details for the substation construction are provided on Sheet 25233-0003-003 SH 001 of the Substation Drawings in Volume 2.



#### **4.1.2 Blasting**

On portions of the Project site, bedrock may be encountered at shallow depths. UI plans to use mechanical measures (e.g., hoe ramming, chipping) to remove bedrock as necessary to create a level site for the development of the substation and for substation equipment foundations. However, based on the depth, extent, and type of bedrock identified during detailed subsurface studies of the Project site, controlled blasting could potentially be required.

If blasting is necessary, UI will retain a blasting contractor licensed by the Connecticut Commissioner of Emergency Services and Public Protection to develop a blasting plan for the Project site. The resulting blasting plan, which would be provided to the Bridgeport Fire Marshall, would comply with state and local regulations and would take into consideration the site's geologic conditions, as well as the locations of nearby utilities and land uses. The blasting plan typically would contain information about the blasting work to be performed, schedule, safety, noise and vibration monitoring, pre- and post-blast inspections, and traffic control measures, as warranted. A copy of the plan would be provided to the Council.

#### **4.1.3 Access Roads and Work Areas**

The Old Town Substation yard will be directly accessible from Kaechele Place via two gated access driveways. Specifically, UI will establish a new access road that will extend from Kaechele Place directly into the new substation. In addition, the existing access to the present Old Town Substation, also off Kaechele Place, will remain. Both access points will be used during construction and subsequently maintained permanently. UI also will develop an on-site access road, which will loop around the interior of the substation yard to facilitate the movement of maintenance equipment and access to the control enclosure.

In addition, access will be established outside both the northern and southern new substation fences. Adjacent to the northern fence, a grassed area will be established on UI property both to maintain a drainage swale and to provide access for construction and subsequent maintenance, if needed. South of the UI property, both UI and Eversource will use the existing off-site access road, located on City of Bridgeport property, which extends from Kaechele Place along the southern boundary of the UI parcel and provides direct access to the southern substation fence and to the Eversource ROW. In accordance with the third-party easement agreement as described in Section 2.3 and illustrated on the drawings in Volume 2, UI will improve this existing access road as necessary (e.g., grading, adding gravel, removing vegetation - including some trees and tree trimming). The access road will be used during the Project construction by both

Eversource and UI and subsequently will be maintained by UI as a permanent access. A gate will be installed across the portion of the road adjacent to Kaechele Place to prevent unauthorized access.

#### **4.1.4 Foundation and Equipment Installation**

The installation of foundations will typically involve excavation, form work, use of steel reinforcement, and concrete placement. Excavated materials will be handled in accordance with appropriate regulatory requirements and will be disposed of properly, off-site as required. After foundations are in place, structures and equipment will be installed pursuant to the new substation plans. The installation of equipment will involve the use of cranes to unload and place large equipment and structural elements.

The installation of the 115-kV monopoles, interconnection of the supply lines to the substation, and connections to the existing distribution system will occur both during and outside of normal work hours because these activities will require that critical transmission and/or distribution equipment be temporarily taken out of service. As a result, UI will schedule this work for off-peak electrical demand hours and will coordinate, as appropriate, with the City of Bridgeport.

The substation will include two 115/13.8-kV transformers that will contain insulating (mineral) oil. The transformer equipment will each have a secondary containment designed to hold at least 110% or greater of a transformer's fluid capacity or 100% plus 24-hour 25-year storm of the transformer's oil volume or more and will include accidental spill prevention measures. UI proposes to install a petro barrier gravity drain system to assist in minimizing the potential for inadvertent oil discharges from the containment. Further, UI will remotely monitor a low oil level alarm that is integral to the system that will notify the UI Operations center in the event of an abnormal condition at the substation.

#### **4.1.5 Wiring, Testing, and Interconnections**

Wiring that will allow the equipment to operate and communicate with the system protection equipment will be installed. After all equipment is installed and wired, the new equipment will be tested to confirm that it is in proper functioning condition and is operating as specified.

#### **4.1.6 Final Site Cleanup/Restoration, Landscaping, and Site Security**

##### **Cleanup and Restoration**

Cleanup and restoration activities will include the removal from Project areas of construction debris, signs, flagging, and fencing, as well as any temporary (i.e., timber mat or equivalent) work pads. As indicated on the Volume 2 plans and drawings, areas outside of and immediately adjacent to the substation

fence/retaining wall will be stabilized via a 5-foot wide gravel and 7-foot wide grassed perimeter access road that will provide ingress/egress for future maintenance purposes. Areas outside of the perimeter access road that were disturbed by construction activities will be regraded, as necessary, and stabilized as appropriate to the area affected.

The portions of the substation yard not otherwise occupied by equipment and enclosures will be stabilized as necessary. Stabilization measures may include, but are not be limited to seeding, gravel, pavement, rip rap, etc.

### **Landscaping**

After the new substation is placed into service and the existing substation is decommissioned, UI will install landscaping around the substation fence that fronts on Kaechele Place. As illustrated on the Landscape Plan included in Volume 2, the areas suitable for landscaping will consist of species that are compatible with the safe operation of the substation.

### **Security**

UI will enclose the perimeter of the substation with a 14-foot-high chain link fence with privacy slats, topped with an additional 1 foot of barbed wire to discourage unauthorized entry and/or vandalism. On those portions of the site where the retaining wall will be built, UI will install the chain link fence on top of the retaining wall. Other physical site security features include:

- Security cameras and motion detectors will be installed to provide complete visibility within the interior of the proposed substation and along the perimeter fence.
- The substation yard will be gated and locked. All gates will be padlocked at the end of the workday during construction activities and at all times once the substation is in service.
- Appropriate signs will be posted at the substation fence and gates, alerting the general public to the presence of high-voltage facilities.
- UI will install LED lighting within the substation yard to facilitate work at night or during inclement weather, as well as to identify entry by unauthorized personnel.

## **4.2 SUBSTATION CONNECTIONS: 115-KV LINE RELOCATIONS**

### **4.2.1 Site Preparation**

Temporary construction work pads will be established as needed to install the new and replacement transmission line structures, which will be located both within the rebuilt substation and outside the

substation fence, within the Eversource ROW. In addition, a previously-used access road from Kaechele Place to the Eversource ROW will be improved, as needed to replace the double-circuit Eversource lattice steel structure located adjacent to the eastern boundary of the existing substation. The locations of work pads and access for the Eversource structure replacements will be identified in Eversource's Partial D&M Plan.

#### **4.2.2 Foundation and Structure Assembly/Installation and Conductor Work**

UI's five new monopole structures to be located inside the perimeter of the substation are expected to be installed on concrete drilled pier foundations. Eversource will replace its two double-circuit lattice steel structures with four new monopoles that will be installed on drilled shaft foundations; all four structures will be located on the Eversource ROW outside the rebuilt Old Town Substation fence.

The transmission line structure foundations will be excavated by heavy equipment. The foundations will use steel rebar for strength and anchor bolts for equipment mounting. The concrete will be brought to the structure locations via concrete trucks from a local ready-mix concrete plant.

After a structure foundation is in place and the concrete is cured, the steel transmission monopole will be assembled and erected. Structure components will be delivered to the work area and then assembled on site. Structures typically will not be erected on the concrete piers for a minimum of 28 calendar days after the concrete has been poured and until the compressive strength of the concrete has reached 4,500 pounds per square inch (psi). However, in certain locations, the structures can be installed prior to the 28-day typical minimum cure time, if the compressive strength of concrete has reached 4,500 psi.

The galvanized steel monopole structures will be assembled in pieces with a crane. Once a structure is erected and framed with the support insulators and hardware, it will be ready for the installation of the relocated 115-kV lines.

The construction of the transmission line structures will be sequenced, based on structure location. The new structures (and conductors) that are not located near the existing transmission line connections to the existing Old Town Substation will be installed first. When the new substation is ready to accept the 115-kV lines, the remaining structures and conductors / OPGW will be installed. Transmission terminations and any other transmission structures not requiring an outage will be constructed prior to any outage required for relocating the new lines. New conductors will be installed between structures where outages are not required.

#### **4.2.3 Removal of Existing 115-kV Structures**

UI will coordinate with Eversource regarding Eversource's removal of the two existing double-circuit lattice steel structures (Structures 857 and 857.5). The structure removal / structure replacement work will be described in Eversource's Partial D&M Plan.

#### **4.2.4 Cleanup and Restoration**

After the installation of the new 115-kV structures and the removal of the old structures, temporary work pads will be removed, along with any construction debris, signs, flagging, etc. and the areas affected by Project construction will be stabilized. Two permanent access roads to the rebuilt substation from Kaechele Place will remain. In addition, UI and Eversource have an agreement with the City of Bridgeport that allows the use of the access road on City property from Kaechele Place for operations and maintenance purposes.

### **4.3 DISTRIBUTION LINE RELOCATION AND CONNECTIONS**

To deliver power from the substation into UI's electric distribution system in the Greater Bridgeport area, the distribution circuits that connect to the existing Old Town Substation will be extended and reconfigured as necessary to link to the new substation. These distribution circuits will consist of duct lines and splice chambers, which will be buried on UI property, as well as beneath local roads. The distribution circuit get-away from the new substation will be two new polyvinyl chloride (PVC) underground duct banks, encased in concrete, from the substation property exiting directly from new splice chambers. The new PVC duct banks will be installed from the splice chambers to existing distribution duct banks or overhead pole lines.

### **4.4 RESOURCE-SPECIFIC CONSTRUCTION PROCEDURES**

This section provides environmental resource-specific protocols and procedures applicable to the Project construction.

#### **4.4.1 Erosion and Sedimentation Control and Stormwater Management**

UI's *Erosion and Sediment Control Plan* for the Project is presented in Appendix A.<sup>7</sup> Detailed erosion and sedimentation control drawings are included in Volume 2. Temporary erosion and sedimentation controls (such as silt fence, straw bales, wattles, filter (silt) socks) will typically be installed where needed after

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<sup>7</sup> Eversource's work will be in accordance with its best management practices for soil erosion and sedimentation control, which will be described in Eversource's Partial D&M Plan. Eversource will coordinate with UI regarding erosion and sedimentation control practices in locations where the companies' Project work overlaps.

initial vegetation removal and in advance of earth disturbance activities, such as grubbing, stump removal, and grading/filling work.

All erosion and sedimentation controls will be installed and maintained in accordance with Project-specific and Connecticut requirements. These include the Connecticut Guidelines for Soil Erosion and Sediment Control (2004); the Connecticut Stormwater Quality Manual (2004); the CT DEEP General Permit; and the Project-specific SWPCP, approved by CT DEEP on Nov. 4, 2024 (Permit No. GSN004119).

Erosion and sedimentation controls will be inspected and repaired or replaced as necessary until the areas affected by the Project are stabilized. Temporary erosion and sedimentation controls (e.g., silt fence, stakes) that are not biodegradable will be removed after the Project site is deemed to be stabilized. UI will submit a Notice of Termination, per the General Permit, to CT DEEP, once final stabilization has been achieved for at least one full growing season (April through October) or two consecutive seeding seasons (April 1 through June 15 and August 15 through October 1).

#### **4.4.2 Groundwater and Materials Management**

Soil, groundwater, and stormwater will be managed appropriately during the construction of the Project. Further, as part of the design of the new Old Town Substation, UI will incorporate engineering controls to manage stormwater runoff during the operation of the facility and will conform to the CT DEEP requirements for stormwater management pursuant to the General Permit and the Project-specific SWPCP.

During Project construction, in addition to the topographic modifications to the proposed substation site, certain work activities will disturb soil. Groundwater could also be encountered in the excavations for the Project facilities. Appropriate erosion and sedimentation controls, as well as dewatering protocols, will be implemented as needed, consistent with the Project SWPCP and General Permit.

Construction activities that will disturb soils include site preparation work such as grading, filling, and the installation of the retaining wall, as well as excavations required to install foundations for the substation enclosures, equipment, and overhead transmission line structures. Soils will be characterized prior to disposal and subsequently managed in accordance with CT DEEP solid waste regulations, UI requirements, and the Project's Material Handling Plan. Certain soils excavated during Project construction may be removed from the Project area and properly managed or disposed of off-site. UI will adhere to state and federal requirements for the disposal of contaminated soils, if any are encountered during construction.

Contaminated groundwater, if any, encountered during Project construction will be managed in accordance with applicable CT DEEP requirements and applicable permits. Prior to discharge, groundwater may be pumped into an appropriate treatment system, which may include a fractionization (frac) tank, a series of bag filters, and/or carbon vessels.

Materials such as soil and groundwater encountered during the construction process will be managed and, as necessary, disposed of in accordance with the procedures described in the Project *Materials Handling Plan*, which conforms to Connecticut's Solid Waste Management guidelines. UI will manage any soil to be reused in accordance with the Connecticut Remediation Standard Regulations (RSRs) or other applicable guidelines.

Most soil will be directly loaded into the appropriate transportation means, however in cases where topsoil or spoil (if any) needs to be temporarily stockpiled at work sites, these materials will be contained within appropriate erosion and sediment controls (e.g., straw bales, silt fence) and may be covered with poly/plastic, pending off-site management. In areas where the characterization studies indicate that topsoil or spoil materials may be re-spread over work sites as part of restoration, stockpiles will be protected with temporary erosion and sediment controls and as appropriate, reseeded for temporary stabilization pursuant to the Project SWPCP.

The management of groundwater dewatered during the Project typically may include but will not be limited to the use of vacuum trucks and off-site management at an approved facility; temporary storage at the Project site in a sediment trap or fractionization (frac) tanks prior to off-site disposal; discharge to an upland area via applicably sized filter bag; and/or discharge to sanitary sewers and/or surface waters, with treatment if required. All dewatering activities will be conducted in accordance with applicable permitting requirements.

#### **4.4.3 Water Resources (Watercourses and Wetlands)**

The Project will not affect any vernal pools and is not located in a floodplain or near any designated aquifer protection areas. However, the Project will involve temporary impacts to a wetland and a portion of an intermittent stream that extends into the wetland.

As illustrated on the Volume 2 maps, the construction of the Project (specifically, the installation of the retaining wall) will require approximately 0.015 acre (637 square feet) of temporary matting (timber or equivalent) in the western portion of the 0.49-acre palustrine forested/scrub-shrub wetland located along



the northern boundary of the new substation site. Within this wetland, temporary matting also will be installed over a portion of an intermittent stream. Forested vegetation within the Project work area will be cut; this will represent a change in wetland cover type but not a long-term loss of wetland functions. UI has consulted with and will obtain permits for this work from the USACE and CT DEEP as necessary.

During Project construction, UI will implement measures to avoid or minimize the potential for runoff into other areas of the wetland and intermittent stream or into the municipal storm sewer system. UI will:

- Require Project construction contractors to perform work in conformance to the requirements of the Project's USACE permit (, the CT DEEP permit GSN004119.
- Install appropriate erosion controls as needed to prevent or minimize the potential for sedimentation into other portions of the wetland, the intermittent stream, or into the municipal storm sewer system. Erosion controls in the wetland will consist of redundant straw bales/wattles instead of hay bales to prevent the spread of non-wetland plant seeds.
- Perform environmental inspections pursuant to the requirements of the Project SWPCP and General Permit.
- Implement procedures for petroleum product management to avoid or minimize the potential for spills into the wetland (e.g., to the extent possible, store petroleum products in uplands more than 50 feet from the wetland and refuel construction equipment, except for equipment that cannot be practically moved, in upland areas only).
- Cut forested wetland vegetation without removing stumps except as necessary for the installation of the retaining wall or grading/filling required for the new substation.
- Install timber construction mats (or equivalent) for temporary access to and work pads in the wetland.
- During Project restoration, stabilize the wetland areas temporarily affected by construction using an appropriate wetland seed mix, as appropriate. No woodchip mulch or fertilizer will be applied in the wetland; if mulch is required, straw mulch will be used.
- The temporary construction mats will be installed so as to maintain flows (if any) in the intermittent stream during Project work. After the removal of the temporary matting, the stream channel, if affected, will be restored to appropriate grade.

#### **4.4.4 Spill Prevention and Control**

UI will require its contractors to adhere to a *Spill Prevention and Control Plan (SPCP)* during Project construction (refer to Appendix B). Such protocols include maintaining adequate spill kits on site and assuring that contractor personnel are aware of the proper procedures for promptly containing, cleaning up, and disposing of spilled materials, as well as for reporting spills to the CT DEEP Emergency Response

Unit. As part of the decommissioning of the existing Old Town Substation, UI will properly remove and dispose of all equipment and fluids.

For the operation of the new substation, UI will develop and implement a *Spill Prevention Control and Countermeasures (SPCC) Plan*. The SPCC Plan will include, but will not be limited to, mitigation measures to be used during facility operation (secondary containment, audio/visual alarms, etc.), environmental emergency contacts, and oil-filled equipment inspections.

#### 4..5 Protection Measures for Listed Species

Based on consultations with the CT DEEP Natural Diversity Data Base (NDDB), there are no known populations of state endangered, threatened, or species of concern on or around the Project site. In addition, UI's consultations with the U.S. Fish and Wildlife Service (USFWS) indicated that the Project site does not provide known habitat for Federally-listed species. However, UI's most recent USFWS consultation, dated September 6, 2024, lists the Tricolored Bat (*Perimyotis subflavus*) for which no critical habitat has been designated yet. While there are no known hibernacula located within Bridgeport or in the adjacent municipalities, based on the results of UI's ecological assessment of the Project site, three to five trees could provide viable NLEB roosting trees. To avoid or minimize the potential for impacts to these species and other future Federally-listed species, UI will continue consulting with the agencies and it will implement the following measures as precaution during Project construction:

- **Tricolored Bat.** UI will not cut trees on the Project site during the NLEB maternity roosting season, which is from June 1 to August 15.
- **Eastern Box Turtle.** A previous NDDB Determination dated October 18, 2019, indicated that a state-listed species of concern-*Terrapene c. carolina* (eastern box turtle) was known to inhabit the Project area. However, the December 1, 2023, NDDB Determination indicated that there were no known populations of federal or state endangered, threatened, or special concern species within the project area. Although the eastern box turtle was removed from the most recent NDDB Determination, UI will implement some of the previous NDDB's recommended protection strategies, as detailed in the NDDB's October 18, 2019 correspondence. Eastern box turtles typically inhabit old fields and deciduous forests, which may include transmission lines and logged woodlands, and are often found near small streams and ponds. The turtles are active between April 1 and October 30; accordingly, UI will conduct vegetation clearing during this time period while the turtles are active to allow any animals to move out of harm's way and minimize mortality to hibernating individuals. UI also will implement the following best management practices as recommended by the NDDB:
  - ✓ Exclusionary practices will be implemented to prevent any turtle access into construction areas. These measures will be installed at the limits of disturbance.

- ✓ Exclusionary barrier will be at least 20 inches tall and will be secured to and remain in contact with the ground and be regularly maintained (at least bi-weekly and after major weather events) to secure any gaps or openings at ground level that may let turtles pass through. Plastic or netted silt-fence will not be used.
- ✓ All staging and storage areas, outside of previously paved locations, will be reviewed to remove individual turtles and exclude them from re-entry.
- ✓ Prior to work on site, all construction personnel working within the turtle habitat will be appraised of the species description and the possible presence of a listed species and instructed to relocate turtles found inside work areas or notify the appropriate authorities to relocate individuals.
- ✓ Any turtles encountered within the immediate work area will be carefully moved to an adjacent area outside of the excluded area, and fencing will be inspected to identify and remove access points.
- ✓ In area where silt fence is used for exclusion, it will be removed as soon as the area is stable to allow for reptile and amphibian passage to resume.
- ✓ No equipment, vehicles, or construction materials should be stored or parked outside the exclusionary fencing.
- ✓ The contractor will search the work area each morning prior to any work being done.

#### **4.4.6 Air Quality Protection (Minimization of Dust and Vehicle Idling Protocol)**

##### **Vehicle/Equipment Idling Requirements**

To minimize emissions from construction equipment and vehicles, UI will require Project contractors to properly maintain equipment and to adhere to Connecticut's anti-idling requirements (RCSA § 22a-174-18). Per Connecticut requirements, the allowable idling time for vehicles of all kinds, including diesel construction equipment, is 3 minutes. However, under winter work conditions (when the ambient temperature is below 20 degrees Fahrenheit) the following apply:

- Construction equipment may require longer periods to warm up after overnight shutdown or other extended periods of inactivity. Such "warm up" periods, as required to bring the equipment up to a safe operating temperature (as defined by the equipment manufacturer), are exempt from the idling time limit. However, most diesel engines take 3 minutes or less to warm up (contractors should consult the engine manufacturer's recommendations).
- Construction equipment may have to idle for longer periods to operate defrosting or heating equipment to ensure the safety or health of the driver.

Note: "Idling" is defined as the period when mobile construction equipment is not in motion or is not otherwise actively performing its designated function. Thus, "idling" does not apply to the use of certain types of mobile construction equipment (e.g., cranes, cement mixers) that may be stationary, but is actively operating, at a work site.

### **Dust Minimization**

Dust will be controlled by applying water or equivalent substances to exposed soil on the Project site, as necessary, per guidance provided in the SWPCP. To minimize tracking of dirt from Project construction areas onto Kaechele Place, crushed stone anti-tracking pads (or equivalent) will be installed as necessary.

#### **4.2.7 Traffic Control/Signs**

The Project site is readily accessible from the local and regional highway network. Access for construction will be by way of local roads, including Main Street and Kaechele Place.

To avoid or minimize the potential for traffic issues on municipal roads during construction, UI's construction contractor will implement access and traffic control measures. Such measures will include procedures for maintaining safe ingress and egress to the Project site for construction equipment and other vehicles, including the use of properly placed signs indicating the presence of a construction work zone. UI's construction contractor will be responsible for posting and maintaining construction warning signs, in accordance with state and local requirements, along public roads in the vicinity of the work areas. Signs will be consistent with the latest version of the federal Manual of Uniform Traffic Control Devices ([MUTCD]).<sup>8</sup> Flaggers or police personnel will be used to direct traffic, as needed.

#### **4.4.8 Cultural Resources: Unanticipated Discoveries Protocol**

Based on cultural resource analyses commissioned by UI and reviewed by the SHPO, the Project construction will not adversely affect known cultural resources. However, in the event that undocumented (buried) cultural materials are discovered during Project construction (particularly grading and excavation work), UI will implement the following procedures if potential archaeological materials are identified:

1. Construction activities will **STOP** at the location where the potential cultural resource materials are discovered.
2. The construction contractor will cordon off the area in the immediate vicinity of the potential cultural resource discovery to keep personnel out of the area.
3. The contractor will not remove, disturb, or damage, the materials.
4. The contractor will immediately notify UI's construction manager, identifying the location of the potential cultural resources material.

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<sup>8</sup> Connecticut has adopted the federal MUTCDs.

5. UI's construction manager will contact the appropriate UI environmental representative or UI's Project environmental inspector/monitor and UI Project Management, who will arrange for a cultural resources consultant to review the information regarding unanticipated discovery, as required, to confirm the potential presence of cultural materials and, if applicable, their possible significance.
6. The cultural resources consultant will perform, as necessary, an on-site inspection of the site of the unanticipated discovery.
  - a. If the field review determines that the archaeological materials are potentially significant, the consultant and UI will coordinate with the SHPO regarding the appropriate methods for removing, documenting, or preserving the artifacts. Construction at the location where the significant cultural materials were discovered will not resume until (i) a treatment plan is prepared and implemented (for example, the significant archaeological deposits are removed for off-site curation); and (ii) UI issues a notice for the contractor to recommence work.
  - b. If the field review determines that the unanticipated discovery is not a potentially significant archaeological deposit, the cultural resource consultant will notify UI. UI then will inform the construction contractor to resume work at the location.

#### **4.4.9 Lighting and Noise Mitigation**

##### **Lighting**

The Project is located immediately east of a developed urban area that is well-lit due to existing commercial facilities and street lighting. Project construction will typically occur during the daytime, when artificial lighting will not be required. If certain construction activities must be performed during night-time (e.g., to adhere to outage requirements), temporary lighting will be positioned to focus illumination on work areas. Such temporary lighting will not affect areas outside the general vicinity of the Project site.

UI will install permanent lighting at the new Old Town Substation for safety and security purposes. The illumination from these lights will be visible in the immediate vicinity of the substation. In general, the lighting at the substation is expected to be consistent with the lighting at the existing Old Town Substation and the illumination of commercial facilities in the vicinity. UI will employ additional lighting only for work at night under abnormal or emergency conditions. The lights at the new substation will incorporate UI's standard design for illumination of substation yards (i.e., the use of area lights mounted on equipment support structures, perimeter fence posts, and enclosures).

##### **Noise**

Project work activities will cause short-term and localized increases in sounds typical of construction activities, particularly due to the operation of heavy equipment for tasks such as vegetation removal, grading

and filling, and foundation excavation. However, construction noise will be focused at and in the immediate vicinity of the Project site and will attenuate with distance. Further, most Project construction activities will occur during daylight hours, between 7:00 AM and 7:00 PM, Monday to Saturday, when human sensitivity to noise is typically less than during the nighttime. In addition, UI will require its construction contractors to properly maintain and, if/when necessary, muffle equipment and vehicles to minimize noise emissions.

#### **4.4.10 Construction Equipment/Vehicle Washing**

Except for concrete trucks, no construction equipment or vehicle washing will be allowed on the Project site. Concrete truck wash-out will be allowed only in designated locations in upland locations on UI property. Any wash-out area will include measures to control and contain wash-water and to collect the cement wash-off, such as in spin-off boxes, for off-site disposal. Other cleaning will be limited to dry brushing of equipment as needed to minimize movement of impacted soils.

Erosion and sedimentation controls deployed at wash-out areas will conform to the relevant provisions of the 2004 Connecticut Guidelines for Soil Erosion and Sediment Control, the 2004 Connecticut Stormwater Quality Manual, the Project SWPCP, and the CT DEEP's General Permit for the Discharge of Stormwater and Dewatering Wastewaters Associated with Construction Activities. (Refer also to the Project *Erosion and Sediment Control Plan* in Appendix A.)

#### **4.4.11 Utility Crossings**

UI's contractor will use "Call Before You Dig" to identify the locations of buried utilities in relation to any sub-surface work.<sup>9</sup>

#### **4.4.12 Winter Work**

Various Project activities will be conducted during the winter months. The removal of snow and ice from construction work areas is critical to maintain a safe work environment. Snow removal and the use of de-icing procedures will be performed to protect worker safety and in accordance with UI's *Snow Removal and De-icing Procedures*, which incorporates the CT DEEP's Best Management Practices for Disposal of Snow Accumulations from Roadways and Parking Lots (refer to Appendix C).

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<sup>9</sup> For distribution line connections to the rebuilt substation that will require work in public roads (e.g., Kaechele Place), UI will coordinate with the City of Bridgeport.

## 5. DECOMMISSIONING PLAN: EXISTING OLD TOWN SUBSTATION

After the new Old Town Substation is placed into service, the existing Old Town Substation will be decommissioned.<sup>10</sup> The decommissioning work will be performed on UI property, using established access roads. The primary steps in the decommissioning process will include:

- De-energize the substation.
- Decommission electrical components within the substation ((e.g., remove oil from circuit breakers and dielectric fluid from transformers);
- Remove metal clad switchgear, panels, racking, steel structures, conductors, high voltage equipment, transformers, capacitor bank and circuit breakers;
- Dismantle and remove above-ground structural components at the substation, including the control enclosure, etc.
- Remove foundations, generally to approximately 6 inches below grade; and
- Resurface the property with crushed stone.

The substation decommissioning will follow all applicable regulatory requirements.

A plan detail regarding the substation decommissioning, illustrating the equipment, structures, and materials that will be removed is provided in Volume 2 (refer to Drawing 25233-0003-001 SH 001).

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<sup>10</sup> The procedures for the removal of the transmission line connections to the existing substation are discussed in Section 4.



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## 6. CONSTRUCTION SCHEDULE AND WORK HOURS

### 6.1 Construction Schedule

In general, Project construction (the new substation and line connections, as well as the removal of the 115-kV line connections to the existing Old Town Substation) is expected to require approximately 18-24 months.<sup>11</sup> UI's overall schedule for rebuilding Old Town Substation is presented in Table 7-1.

**Table 6-1: Project Construction Schedule**

| Activity                                     | Estimated Start Date | Estimated Completion Date |
|--|----------------------|---------------------------|
| <b>Rebuild (New) Substation</b>              |                      |                           |
| Mobilize Civil Construction Contractor       | 4/21/2026            | 5/16/2026                 |
| Site Clearing and Grading                    | 5/3/2026             | 5/31/2026                 |
| Install Transmission Line Foundations        | 8/5/2026             | 3/18/2027                 |
| Install New Substation Equipment Foundations | 8/5/2026             | 3/18/2027                 |
| Install Substation Equipment                 | 10/2/2026            | 7/30/2027                 |
| Test and Commission Substation Equipment     | 8/1/2027             | 12/28/2027                |
| Outages                                      | 3/18/2027            | 12/28/2027                |
| Energize Substation                          | 12/28/2027           | 12/28/2027                |
| <b>Decommission Existing Substation</b>      |                      |                           |
| Removal of Old Substation                    | 12/28/2027           | 6/30/2028                 |
| <b>Site Restoration</b>                      | May 2028             | October 2028              |

Site preparation (e.g., vegetation removal, grading, filling, installation of the retention wall) and foundation installation will be performed during the initial six months of Project construction and will involve the use of earth-moving equipment and other construction vehicles. The installation and testing of substation equipment are expected to take approximately 18 months. These activities will involve the use of cranes to unload and install structural elements and large equipment.

To connect the 115-kV lines, substation terminal structures, and the distribution lines, certain transmission and/or distribution equipment will have to be taken temporarily out of service. As a result, this work will be coordinated with the Connecticut Valley Electric Exchange (CONVEX), which operates the electric transmission system in Connecticut and western Massachusetts. To complete these interconnections as efficiently as possible with minimal service disruptions, work will have to be performed continuously, requiring construction activities outside of normal work hours, as noted above.

<sup>11</sup> UI has not finalized the schedule for decommissioning the existing Old Town Substation. However, the decommissioning work could extend beyond the time frame for the completion of the new substation and line connections.

As identified in Table 7-1, whereas the rebuilt Old Town Substation will be placed into service in December 2027, final restoration (including final site stabilization via reseeded or other measures) will be performed after the existing substation is decommissioned. In addition, post-restoration inspections to document the effectiveness of site rehabilitation will be performed in accordance with the General Permit and Project-specific SWPCP; such inspections are expected to extend into 2028. Based on the current Project schedule, full restoration is expected to be completed in the Fall of 2028.<sup>12</sup>

## **6.2 Work Hours**

Project construction hours will typically be from 7 AM to 7 PM, Monday through Saturday. Construction personnel may arrive and leave the Project site outside of these hours (e.g., for meetings in office trailers or to hold safety or other work briefings). However, except as noted below, no noise-generating construction equipment will be routinely operated after 7 PM or before 7 AM, Monday-Saturday, or on Sunday, unless approved in advance by the Council.

Certain specific construction tasks will require work on Sundays or beyond standard daily work shifts, particularly when outages are required. For example, to connect the Eversource 115 kV lines, substation terminal structures, and distribution lines, certain transmission and/or distribution equipment will have to be taken temporarily out of service. UI will coordinate this work with CONVEX to obtain specific outage times. To complete such tasks as efficiently as possible with minimal service disruptions, work may have to be performed continuously (24/7). Similarly, the delivery and installation of large substation equipment (e.g., transformers, the control enclosure) may require work outside of typical times and in some cases may require 24/7 work (e.g., transformer filling).

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<sup>12</sup> Pursuant to the CT DEEP General Permit, the Project will be considered complete after all post-construction measures are installed, cleaned, functioning, and inspected, and the site has achieved final stabilization for at least one full growing season (April – October) after the cessation of construction activities.

## 7. PERMITS AND APPROVALS

As part of the overall Project planning process and/or during the preparation of this D&M Plan, UI coordinated with representatives of various regulatory agencies, including the CT DEEP, SHPO, FAA, USFWS, and the USACE, as well as the City of Bridgeport, Town of Trumbull.<sup>13</sup> In addition to authorization from the Council for the Project, UI has obtained approvals from other State and Federal agencies, including the Public Utilities Regulatory Authority (PURA).

Table 7-1 summarizes the Project permits and/or approvals.

As specified in the Council's Decision and Order (Condition No. 4), prior to the commencement of construction, UI will provide the Council with a copy of necessary permits received for the Project from any other State or federal agency with concurrent jurisdiction.

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<sup>13</sup> UI coordinated with the Federal Aviation Administration (FAA); the FAA reviewed the heights of the new monopoles and issued Determinations of No Hazard (DNH) to aviation for all structures. UI coordinated with the Town of Trumbull during the CSC application process because the substation property is within 2,500 feet from the Bridgeport-Trumbull border.

**Table 7-1: Permits and Approvals**

| Agency                                       | Potential Permit/Approval Required   | Application Submitted or Consultation (Date)   | Status  |
|--|--|--|---|
| <b>FEDERAL</b>                               |  |  |   |
| <b>USACE</b>                                 | Self-Verification Notice or Pre-Construction Notification  | Prior to start of construction involving wetland and stream  | Coordination ongoing  |
| <b>USFWS</b>                                 | Request for consultation per Section 7 of the Endangered Species Act (e.g., for potential presence of Northern Long Eared Bat)   | Request for threatened/endangered species review   | Complete  |
| <b>STATE</b>                                 |  |  |   |
| <b>CONNECTICUT SITING COUNCIL</b>            | Municipal Consultation Filing<br><br>Certificate of Environmental Compatibility and Public Need under C.G.S. § 16-50/(a)(1)<br><br>Development and Management Plan (after issuance of certificate and prior to Council's approval to start construction) | January 2020<br><br>March – April 2020<br><br>December 2024  | Complete; March 2020<br><br>Approved January 28, 2021<br><br>Pending                                |
| <b>CT DEEP</b><br>• NDDB<br><br>• Stormwater | Threatened and endangered species review<br><br>General Permit for the Discharge of Stormwater and Dewatering Wastewaters from Construction Activities (DEEP-WPED-GP-015) and SWPCP  | Review form submitted October 2019 and December 2023. Project site is not within area of listed habitat per publicly available NDDB mapping.<br><br>Submitted 2024 | NDDB response of October 18, 2019 and December 1, 2023.<br><br>Approved November 4, 2024, GSN004119 |
| <b>CT SHPO</b>                               | Cultural Resource Consultation under C.G.S. § 16-50/(e) and Tribal Notification  | Cultural resources review performed; review form submitted to SHPO November 2019; Tribes notified May 2024   | Complete, no cultural resources known at Project site   |
| <b>PURA</b>                                  | Approval of Manner and Method of transmission line construction and energization per Conn. Gen. Stat. Section 16-243   | Petition submitted   | Approved Docket No. 22-12-14  |
| <b>MUNICIPAL</b>                             |  |  |   |
| City of Bridgeport                           | Consultations in conjunction Third-Party Agreement for access road on City property off Kaechele Place<br><br>Coordination with Fire Marshall (Blasting Permit, if necessary)  | Permanent easement for access road, 2023-2024<br><br>If needed   | Approved by Bridgeport: September & December 2024<br><br>Coordination if blasting is necessary      |

## 8. PUBLIC REVIEW AND OUTREACH

In conjunction with the submission of this D&M Plan to the Council, UI will post the filed D&M Plan on the Project web site (UIRailroadTLineUpgrades.com) and will provide the D&M Plan to Bridgeport and Town of Trumbull municipal officials, as well as to those on the CSC service list for the Project.

Throughout the substation rebuild process, UI outreach representatives will be available to brief residents and businesses affected by Project construction activities and other interested stakeholders regarding the construction process, key construction stages, and expected construction timeline. UI Project representatives will also contact adjacent and nearby residents and businesses to notify them of upcoming construction activities and will be reachable throughout the construction process to address any specific questions or concerns.<sup>14</sup>

UI outreach representatives also will notify municipal officials in advance of the planned use of helicopters (if any) during Project construction (the use of helicopters is at the construction contractors' discretion).

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<sup>14</sup> UI outreach representatives also will work with Eversource's outreach personnel to coordinate abutter and municipal consultations, as appropriate, for the Project.

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## **9. NOTICES AND REPORTS TO THE COUNCIL, INCLUDING MODIFICATIONS TO THE D&M PLAN**

Pursuant to Sections 16-50j-60 through 16-50j-62 of the Regulations of Connecticut State Agencies (RCSA) and the CSC's Decision and Order in Docket 490, UI, will provide written notices and reports to the Council as listed in Table 9-1.

In addition, pursuant to RCSA Section 16-50j-62(b)(2), the Council / Council staff must approve any significant changes to the Project D&M Plans. No significant changes to the D&M Plans will be implemented without Council approval.

Accordingly, if any significant changes to the D&M Plans are required, UI will submit advance written notice (letter, e-mail) of such proposed changes to the CSC. If advance written notice is impractical, verbal notice will be provided to the CSC immediately, followed up by written notice not less than 48 hours after the verbal notice. Significant D&M Plan changes, as defined in the RCSA, may include but not be limited to modifications to Project construction plans such as:

- The location of a wetland or watercourse crossing.
- The location of an accessway or structure in a regulated wetland or watercourse area.
- The construction or placement of any temporary structures or equipment.
- Transmission line structure type or location including, but not limited to, towers, guy wires, associated equipment, or other structures.
- Use of additional mitigation measures or elimination of mitigation measures.

Pursuant to RCSA Section 16-50j-61(d), notice of a filing of changes to the D&M Plan that require Council approval will be provided to the service list and the property owner of record, if applicable, at the time that the filing is made with the Council.



**Table 9-1: Notices and Reports to the Council**

| <b>Docket 490 Decision &amp; Order Condition No. / RSCA Citation</b> | <b>Notice Requirement</b>  |
|--|--|
| Condition No. 4  | Provide the Council, prior to the commencement of construction, a copy of necessary permits from any other State or Federal agency with concurrent jurisdiction.   |
| Condition No. 5 / RSCA §16-50j-62                                    | <p>Advance written notice prior to the commencement of construction activities –Provide the CSC with <u>written advance notice two weeks before the commencement of Project construction.</u></p> <p>Written notice of the completion of site construction and commencement of substation operation</p>  |
| Condition No. 6  | Notify the Council <u>no less than 60 days prior to when the existing substation operations terminate.</u>   |
| Condition No. 7  | Construction must be completed within 5 years of the effective date of the Council’s Decision and Order (i.e., January 28, 2026). UI must provide written notice to the Council’s Executive Director of any schedule changes as soon as practical.   |
| Condition No. 8  | <p>No later than 60 days prior to the expiration date of the Project Certificate, UI must file with the Council any request for extension of the time period referred to in Condition 7. The request must be served to all parties and intervenors.</p> <p>Any proposed modifications to the Decision and Order also must be so served.</p>  |
| §16-50j-62(c)(1-5)   | <p><b><i>Final Report</i></b> –Within 180 days after completion of all Project construction and site rehabilitation, UI must provide the CSC with a final report that identifies the following:</p> <ol style="list-style-type: none"> <li>1 All agreements with abutters or other property owners regarding special maintenance precautions.</li> <li>2 Significant changes to the D&amp;M Plan that were required because of property rights or underlying and adjoining owners or for other reasons.</li> <li>3 The location of construction materials that have been left in place, including but not limited to, culverts, erosion control structures along watercourses and steep slopes, and corduroy roads in regulated wetlands.</li> <li>4 The location of areas where special plantings and reseeding have been performed.</li> <li>5 The actual construction cost of the facility, including but not limited to the following costs: <ol style="list-style-type: none"> <li>a. Clearing and access;</li> <li>b. Construction of the facility and associated equipment;</li> <li>c. Rehabilitation; and</li> <li>d. Property acquisition for the site or access to the site.</li> </ol> </li> </ol> |

## 10. ACRONYMS AND GLOSSARY OF TERMS

| Acronym                          | Description   |
|----------------------------------|---|
| <b>115-kV:</b>                   | 115-kilovolts or 115,000 volts  |
| <b>Access Road</b>               | A road (permanent or temporary) that provides access to Project work sites or new monopoles   |
| <b>ACSS:</b>                     | Aluminum Conductor Steel Supported, a common type of overhead conductor   |
| <b>ADSS:</b>                     | All-dielectric self-supporting fiber  |
| <b>AGL:</b>                      | Above Ground Level  |
| <b>ANSI:</b>                     | American National Standards Institute   |
| <b>Application:</b>              | Application to the Connecticut Siting Council for a Certificate of Environmental Compatibility and Public Need (CSC Docket No. 490 for this Project)  |
| <b>BMP:</b>                      | Best Management Practices   |
| <b>CCVT:</b>                     | Coupling Capacitor Voltage Transformer  |
| <b>Certificate:</b>              | Certificate of Environmental Compatibility and Public Need (from the Connecticut Siting Council)  |
| <b>CT DEEP:</b>                  | Connecticut Department of Energy and Environmental Protection   |
| <b>Conn. Gen. Stat.:</b>         | Connecticut General Statutes  |
| <b>Conductor:</b>                | A metallic wire, busbar, rod, tube or cable which serves as a path for electric current flow.   |
| <b>Construction:</b>             | Construction refers to Project activities commencing with work site/staging area preparation through final restoration and site stabilization.  |
| <b>CONVEX:</b>                   | Connecticut Valley Exchange   |
| <b>Council (or CSC):</b>         | Connecticut Siting Council  |
| <b>CWA:</b>                      | Clean Water Act (Federal)   |
| <b>D&amp;M Plan:</b>             | Development and Management Plan (required by the Connecticut Siting Council)  |
| <b>dBA:</b>                      | Decibel, on the A-weighted scale  |
| <b>dbh:</b>                      | Diameter breast height (tree trunk measurement)   |
| <b>Direct Embed:</b>             | Transmission structure installation type in which the bottom section of each pole is placed in an excavated hole. Does not require the use of foundations or concrete. H-frame and guyed pole structures are typically direct embedded. |
| <b>DNH:</b>                      | Determination of No Hazard (FAA)  |
| <b>Drilled Shaft:</b>            | Transmission structure foundation type involving the use of drilling rigs and pneumatic hammers to excavate an area for the structure foundation. Concrete is used for the foundation.  |
| <b>EMF:</b>                      | Electric and magnetic field   |
| <b>Eversource:</b>               | The Connecticut Light & Power Company d/b/a Eversource Energy   |
| <b>FAA:</b>                      | Federal Aviation Administration   |
| <b>FEMA:</b>                     | Federal Emergency Management Agency   |
| <b>Frac Tank:</b>                | Fractionization tank, used to temporarily hold water pumped from Project excavations or otherwise used during Project construction activities   |
| <b>General Permit (CT DEEP):</b> | General Permit for the Discharge of Stormwater and Dewatering Wastewaters from Construction Activities  |
| <b>Grounding System:</b>         | Ground rings, placed around transmission line poles and counterpoise as required.   |
| <b>Idling:</b>                   | The period when mobile construction equipment is not in motion or is not otherwise actively performing its designated function.   |
| <b>IEEE:</b>                     | Institute of Electrical and Electronics Engineers   |

| <b>Acronym</b>            | <b>Description</b>   |
|---------------------------|--|
| <b>kV:</b>                | kilovolt (equals 1,000 volts)  |
| <b>MUTCD:</b>             | Manual of Uniform Traffic Control Devices  |
| <b>NDDB:</b>              | Connecticut Natural Diversity Data Base (CT DEEP)  |
| <b>NERC:</b>              | North American Electric Reliability Council, Inc. (initially, the National Electric Reliability Council) |
| <b>NESC:</b>              | National Electrical Safety Code  |
| <b>NRCS:</b>              | Natural Resources Conservation Service (United States Department of Agriculture)                         |
| <b>NRHP:</b>              | National Register of Historic Places   |
| <b>NWI:</b>               | National Wetlands Inventory  |
| <b>OPGW:</b>              | Optical ground wire (a shield wire containing optical glass fibers for communication purposes)           |
| <b>PCN:</b>               | Pre-Construction Notification (USACE)  |
| <b>PURA:</b>              | Public Utilities Regulatory Authority (part of CT DEEP)  |
| <b>Project:</b>           | Old Town Substation Rebuild Project  |
| <b>RCSA:</b>              | Regulations of Connecticut State Agencies  |
| <b>ROW:</b>               | Right-of-way   |
| <b>RSR:</b>               | Remediation Standard Regulations   |
| <b>SCADA:</b>             | Supervisory Control and Data Acquisition System  |
| <b>SF</b>                 | Square Feet  |
| <b>SHPO:</b>              | Connecticut State Historic Preservation Office   |
| <b>SPP:</b>               | Species Protection Plan  |
| <b>SRHP:</b>              | State Register of Historic Places  |
| <b>SVN:</b>               | Self-Verification Notice (USACE)   |
| <b>SWPCP:</b>             | Stormwater Pollution Control Plan  |
| <b>Transmission Line:</b> | Any electric line operating at 69,000 or more volts.   |
| <b>UI, Company:</b>       | The United Illuminating Company  |
| <b>USACE:</b>             | United States Army Corps of Engineers  |
| <b>USDA:</b>              | United States Department of Agriculture  |
| <b>USFWS:</b>             | United States Fish and Wildlife Service  |
| <b>USGS:</b>              | United States Geological Survey (U.S. Department of the Interior)  |
| <b>XS:</b>                | Cross-section (drawing)  |

**APPENDIX A**

**EROSION AND SEDIMENT CONTROL PLAN**

(Per CSC Docket 490, Condition 1(b))

**December 2024**

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## 1. INTRODUCTION

The Old Town Substation Rebuild Project (Project) will be located on a 3.9-acre property owned by The United Illuminating Company (UI or the Company) in the northwestern portion of the City of Bridgeport. Whereas approximately 0.9 acre of the property is occupied by the existing Old Town Substation, the remainder of the site is undeveloped and is characterized primarily by upland deciduous early successional forest; a wetland is located on the northern border of the property.

During the construction of the Project, UI will install and maintain erosion and sedimentation controls to avoid or minimize the potential for surface water runoff, erosion, and sedimentation to occur outside of active Project work areas. These measures will conform to applicable regulations concerning soil and erosion/sedimentation control and stormwater management, including the Connecticut Department of Energy and Environmental Protection's (CT DEEP) General Permit for the Discharge of Stormwater and Dewatering Wastewaters from Construction Activities (General Permit), the *2004 Connecticut Guidelines for Sedimentation and Erosion Control* (as amended), the *2004 Stormwater Quality Manual*, and the provisions of the Project-specific Stormwater Pollution Control Plan (SWPCP).

UI's Project SWPCP incorporates erosion and sedimentation control measures, as appropriate to the Project, referenced in the 2004 Connecticut Guidelines and the 2004 Stormwater Quality Manual. In the Fall of 2024, UI submitted the Project SWPCP to CT DEEP for review and authorization, pursuant to the General Permit. CT DEEP issued a Notice of Permit Authorization for the Project on November 4th, 2024, as Permit No. GSN004119.

The SWPCP will be implemented by UI and its construction contractor(s) to avoid, minimize, or eliminate potential adverse environmental effects during transmission line construction, and will identify measures to reduce the likelihood of sediment migration from construction sites. After the new substation is placed in service and the existing Old Town Substation is decommissioned and dismantled, the areas affected by Project activities will be restored and permanently stabilized.



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## 2. EROSION AND SEDIMENTATION CONTROL METHODS

Various Project construction activities will result in soil disturbance. Such activities include vegetation clearing using mechanized equipment, grading, excavations for structure and equipment foundations, and general soil / spoils stockpiling. In addition, equipment movement to and from the Project site could generate dust. During construction, UI will implement procedures to minimize the potential for soil erosion and sedimentation, as well as to limit the generation of fugitive dust. The objectives of these procedures will be to:

- Protect nearby water resources (wetlands and waterbodies) during construction by preventing or minimizing the potential for the migration of sediment from work sites.
- Minimize the quantity and duration of soils exposed to potential erosion by installing appropriate erosion and sedimentation controls, removing soils from the Project area as appropriate (i.e., loading excavated soils directly into dump trucks for appropriate off-site disposal), stabilizing any soils that are temporarily stockpiled on Project work sites, and restoring work sites.
- Avoid or minimize both the generation of dust from construction vehicle movements on unpaved access roads and the tracking of dirt from Project work sites onto local roads.

The following summarizes UI's Erosion and Sediment Control Plan for the Project. Additional details are provided in the SWPCP. Applicable Project construction contractors will be given a copy of the SWPCP and will be required to certify that they have read, understand, and will comply with the SWPCP during Project construction.

### 2.1 Soil Management and Erosion Controls

UI will install and maintain both temporary and permanent erosion and sedimentation control measures, as appropriate, during Project construction. Permanent erosion and sedimentation control measures will be used as necessary along permanent access roads or in other areas, as required by site-specific conditions.

Temporary erosion and sedimentation controls may be installed before or after vegetation removal, depending on site-specific characteristics. More typically, such controls will be installed after vegetation removal and will be deployed as needed around work site limits (e.g., access roads, work pads) in or near

wetlands, streams, and other sensitive environmental or land use resources, as well as along access roads and around work pads near slopes or water resources.

Temporary erosion and sedimentation controls typically will consist of hay/straw bales, silt fence, straw wattles, coir logs, diversion swales, dewatering settling basin, sediment trap, anti-tracking pads, temporary access matting, hay bale corrals for management of spoils or concrete washout areas, and/or erosion control blankets. Erosion control fabric will also be installed in catch basins, as needed. Erosion and sedimentation controls will be deployed in accordance with the SWPCP, the General Permit, the *2002 Connecticut Guidelines for Sedimentation and Erosion Control* (as amended), the *2004 Stormwater Quality Manual*, and UI's construction plans and specifications. Volume 2 includes representative illustrations of typical temporary erosion and sedimentation controls; additional details regarding such controls are provided in the SWPCP.

The types of erosion controls used will be appropriate to the urban/suburban areas and environmental resources in the Project area. In addition, pursuant to the General Permit and the Project SWPCP, UI's qualified environmental inspector/monitor (refer to Attachment I of the Project-Wide D&M Plan) will routinely perform monitoring to verify the effectiveness of the erosion and sedimentation controls. Based on the results of the inspections, UI may require the contractors to augment or modify erosion and sedimentation control methods during different construction phases.

Temporary erosion and sedimentation controls will be maintained, as necessary, throughout all phases of Project construction, until areas of disturbed soil are appropriately stabilized. (Refer to Section 2.4.)

Permanent erosion and sedimentation controls may include, among others, hydrodynamic separators, underground detention structures, broad-based dips, water bars, rock swales/rip rap channels, and plunge pools. Other permanent stabilization measures may include retaining walls, if necessary. UI will require the construction contractors to install appropriate permanent erosion and sedimentation controls, if necessary, to stabilize permanent access roads. Such permanent controls will be in accordance with the SWPCP specifications.

## **2.2 Dust Control and Anti-Tracking Measures for Sediment Control**

Fugitive dust may be generated from Project construction activities such as vegetation removal, construction vehicle and equipment movements on non-paved access roads and work pads, excavations for

structure foundations, and regrading as needed for restoration. Dirt from unpaved access roads also may be tracked onto adjacent paved surfaces.

Crushed stone (or equivalent) anti-tracking pads will be installed on Project access roads at the intersection with paved public roads. These anti-tracking gravel areas will minimize the amount of dirt tracked onto local roads by construction vehicles and equipment. In addition, UI will require its construction contractors to regularly inspect and sweep paved road surfaces to remove excess accumulations of dirt that may be unavoidably tracked onto the roads despite the gravel anti-tracking pads.

To minimize the amount of dust generated by Project construction, standard dust minimization practices will be implemented. For example, access roads may be sprayed with water to minimize dust.

### **2.3 Dewatering**

On-site dewatering may be required as a result of Project excavation activities. Groundwater classified as “clean” may be dewatered from the excavation through an appropriate dewatering settling basin and/or through a sediment filtration bag and discharged to upland areas, consistent with the SWPCP. Under no circumstances will the water be discharged into wetlands or watercourses. UI’s construction contractor will be responsible for inspecting sediment filtration measures on a daily basis, replacing or cleaning such controls as necessary, and properly disposing of any sediment collected.

### **2.4 Restoration**

As the final phase of the Project, areas disturbed by construction activities will be restored. Restoration will consist of the removal of construction materials (e.g., construction mats) and debris, as well as regrading, where necessary, and seeding / mulching or otherwise stabilizing (e.g., repaving, adding gravel).

The objective of the restoration effort will be to rehabilitate work sites to be consistent with adjacent areas and with the operation and maintenance of the rebuilt overhead 115-kV transmission lines. Wetland areas affected by construction will be either allowed to revegetate naturally, reseeded with temporary annual seed mix that will promote stabilization, or reseeded with wetland seed mixes in accordance with restoration plans approved for such use by CT DEEP and/or the U.S. Army Corps. of Engineers. Hay mulch will not be used in wetlands.

During Project restoration, temporary erosion and sedimentation controls will be maintained or reinstalled, as necessary. These controls will remain in place until the SWPCP inspector/monitor determines that final stabilization has been achieved. SWPCP inspections will continue for at least one full growing season following site stabilization, as defined by the General Permit.<sup>15</sup> Temporary erosion and sedimentation controls (e.g., silt fence, stakes) that are not otherwise biodegradable will be removed after Project work sites are deemed to be stabilized.

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<sup>15</sup>. The growing season is defined as April-October, with seeding seasons within that time period consisting of April 1 to June 15 and August 15 to October 1. The growing season consists of both seeding seasons.

# **APPENDIX B**

## **SPILL PREVENTION AND CONTROL PLAN**

**(Per CSC Docket 490, Condition 1(c))**

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## ATTACHMENTS

B.1: Spill Report Form



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## **1. INTRODUCTION**

### **1.1 Purpose of the Plan**

The purpose of this Spill Prevention and Control Plan (SPCP) is to:

- Describe measures to minimize the potential for a spill of petroleum products or a hazardous or toxic substance; and
- Should a spill occur, to contain and control the release to minimize the effects.

During the construction of the Old Town Substation Rebuild Project (Project), The United Illuminating Company (“UI” or “the Company”) will require all construction contractors to adhere to the procedures presented in this SPCP, as well as to the Release Reporting Regulations as contained in the Regulations of Connecticut State Agencies §§22a-450-1 to 22a-450-6. The SPCP applies to all elements of the construction of the Project, including work sites and access roads, off-site access roads, and contractor yards/staging areas that are used to support the Project construction.

### **1.2 Materials Subject to this SPCP**

The principal materials used during Project construction are petroleum products, such as fuels, lubricants, fluids, and related materials used for the operation of construction vehicles and equipment. Small amounts of other substances classified as hazardous materials or toxic may also be used during construction. UI will work with their contractor to minimize when possible the use of hazardous materials.

Each construction contractor will compile and maintain a list of the petroleum products and hazardous / toxic substances to be used in the performance of Project work, along with a Safety Data Sheet (SDS) for each such material. During construction, the SDSs will be available either on-site (e.g., at the construction contractor’s Project office trailer at the Project construction staging area/yard), in the contractor’s construction field office, or electronically. The list of products and associated SDSs will be made available to UI upon request.

Due to the different types of petroleum products and other regulated materials typically used during construction, different handling and storage procedures may apply. Construction contractors are required to adhere to all manufacturers’ directions and warnings for products used during the Project.

**1.3 Designation of Connecticut-Licensed Spill Response and Cleanup Contractor**

Before the start of construction, each primary Project construction contractor must identify a licensed spill response contractor who can respond promptly, if required, during construction as detailed in Section 3.4 of this SPCP.

## 2. SPILL PREVENTION AND MANAGEMENT PRACTICES

Key measures to avoid or minimize the potential for spills during construction include training construction personnel in spill prevention techniques, properly maintaining construction equipment, keeping appropriate spill kits on equipment and/or at the work site, and effectively managing the storage and use of petroleum and hazardous/toxic substances. If a spill does occur, construction personnel will be trained in the techniques to promptly and properly contain, clean up, and report the spill or – in the event of a major release – to promptly contact the designated spill response and cleanup firm.

**Spill Prevention Protocols.** Project contractors will be required to implement procedures aimed at minimizing the potential for spills and for promptly responding to and reporting spills should they occur. Examples of such procedures are:

- a. Prior to construction, implement employee awareness / training regarding the handling of fuels and, as applicable, hazardous or toxic materials.
- b. Inspect, operate, and maintain equipment to minimize the potential for the accidental discharge or release of fuel, oil, or lubricants to the environment, including routine inspections of hydraulic lines, valves, and other hoses and promptly repairing any equipment leaks or faulty equipment.
- c. routinely inspect and maintain in good condition all containers, valves, pipes, hoses, and other components of storage areas for fuels and lubricants.
- d. Perform refueling in uplands to minimize the potential for a release to the environment and sensitive resources. (If equipment refueling must unavoidably be performed in a wetland – such as for drilling equipment that cannot easily be moved to an upland, additional spill prevention precautions must be implemented.)
- e. Provide appropriately sized and provisioned spill containment kits to construction crews and replenish such supplies.
- f. Maintain stockpiles of spill cleanup materials at easily accessible locations.
- g. Conform to regulatory requirements and Project specifications regarding equipment operation, refueling, and the use of petroleum products near water resources.
- h. In the event of a spill, promptly respond and follow required reporting procedures.

Project contractors will also be responsible for providing portable toilets at the construction site. The construction contractor will be responsible for properly locating portable toilets in upland areas, away from any water resources, sensitive environmental resources, drainage systems, or other restricted areas, and for

arranging for routine cleaning and maintenance of these facilities to avoid or minimize the potential for a biohazard release to the environment.

**Fuel and Material Storage.** Project construction contractors will be required to implement the following procedures when storing fuels and hazardous / toxic substances at the Project site. These procedures are intended to limit the potential for spills and to minimize the impact of releases that may accidentally occur:

- a. No bulk quantities of hazardous substances, toxic materials, or petroleum products will be stored, unless approved by UI, within 50 feet of any waterbody, wetland, water supply well, spring, drainage system, or other water resource. Such materials typically will be stored in upland areas.
- b. At Project staging and support sites, contractors will make efforts to store only enough products required to complete the job;
- c. Materials will be stored in a neat, orderly manner, in appropriate containers, and, where appropriate, under a roof or enclosure;
- d. Chemical and/or petroleum products will be kept in original containers with the original manufacturer's label. Fuels that need to be kept in portable containers will be stored in tightly sealed containers designed to hold such fuels and will be clearly labeled. Preferably, the containers will be stored in a covered truck or trailer that provides secondary containment for the products;
- e. Substances will not be mixed unless approved by the manufacturer;
- f. Whenever possible, all of a product will be used before disposing of the container;
- g. Manufacturer's recommendations for proper use and disposal of a product will be followed; and
- h. If surplus product must be disposed, the manufacturer's or state-recommended methods for proper disposal will be followed.

Any containment area for the storage of petroleum products will have a minimum capacity of 110% (1.1 times) the combined maximum volume of all containers within the containment area. The containment must have sufficient freeboard to accommodate the maximum precipitation from a 25-year, 24-hour storm event.

Storage areas will not have drains unless such drains lead to a containment area or vessel of sufficient size to contain and recover a full release of all stored products. A berm, or other suitable containment device, will be installed around any storage shed housing materials that are potentially hazardous to the environment. Bulk storage tanks having a capacity of more than 55 gallons will be provided with appropriately sized secondary containment.

After each rainfall, the contractor will inspect all containment areas for excess water:

- If no sheen is visible, the contractor can pump the collected water to the ground in a manner that does not cause scouring.
- If a sheen is present, liquids, sludge or solid with any sheen must be cleaned up, stored in an appropriate container and disposed of appropriately.

**Equipment Refueling and Parking.** During construction of the Project, UI anticipates that contractor vehicles and most construction equipment (e.g., dump trucks, water trucks) will be refueled at local gas stations. However, the contractor may store fuel supplies at the Project construction yard(s) and some equipment may be refueled there. In addition, certain large, less mobile equipment (such as drill rigs and cranes) will be refueled at the Project site.

Contractors will implement the following measures when refueling equipment and when parking equipment on Project sites:

- a. Refueling equipment will be manned throughout the refueling operation.
- b. Spill kits will be on hand during all refueling operations.
- c. Equipment refueling will not be performed within 50 feet of any wetland unless temporary containment is provided.
- d. During refueling, precautions will be taken to avoid or minimize the potential for an accidental spill. Appropriate spill kits / absorbent materials will be available at all refueling sites.
- e. Except for equipment that cannot be practically moved (e.g., cranes, drill rigs), construction equipment and vehicles will not typically be serviced or parked overnight on access roads or work pads within wetlands. If equipment must remain in a wetland overnight, secondary containment will be provided.

### 3. SPILL EQUIPMENT, RESPONSE, CONTROL, AND CLEANUP

#### 3.1 Spill Containment and Cleanup Equipment

Contractors are required to provide appropriate spill containment and cleanup equipment for use as needed during Project construction. Table 3-1 lists the typical spill containment and cleanup materials to be kept on-site, as well as at contractor yards, during construction. In response to a spill, the contractor will use equipment and control/cleanup measures appropriate to contain and clean up the spilled material, taking into consideration the environmental characteristics of the area affected by the release.

**Table 3-1: Typical Spill Containment and Cleanup Equipment and Supplies**

**For General Construction in Upland Areas:**

- Sorbents (e.g., pillows, socks, and wipe sheets) for containment and pick-up of spilled liquids;
- Pre-packaged, self-contained spill kits containing a variety of sorbents for small to large release (e.g., kits that can be stored on equipment with the capacity of absorbing up to 5 gallons);
- Structures such as gutters, culverts, and dikes for immediate spill containment;
- Shovels, backhoes, etc., for excavating contaminated materials;
- Sumps and collection system; and
- Drums, barrels, and temporary storage bags to clean up and transport contaminated materials.

**For General Construction in or Near Water Resource Areas:**

All of the above (for upland sites) and the following:

- Oil containment booms and the related equipment needed for rapid deployment; and
- Equipment to remove petroleum-based products from water.

**For Storage of Products and Equipment Refueling:**

- Sorbent pads and/or mats, containment equipment, or equivalent protective measures (e.g., kiddie pools or basins to be placed on the ground beneath equipment before refueling or maintenance activities). (The quantity and capabilities of the mats will be sufficient to capture the largest foreseeable spill given workspace characteristics, crankcase size, and other fuel vessel capacities.)
- Dedicated sorbent / spill response kits or functional equivalent to be kept on major pieces of construction equipment (e.g., pumps, cranes, drill rigs, hydraulic lifts) that must be routinely refueled or maintained on Project sites because movement of such equipment to designated refueling or maintenance yards is impractical or inefficient.

### 3.2 Spill Response and Control

If a spill occurs, the immediate priority is to stop and contain the release. Project construction contractor(s) will take immediate action to minimize the impact of the spill (containment) and to implement appropriate cleanup action. Cleanup procedures will begin immediately after a release is contained. In the event of a spill, the contractor will typically take the following actions:

- Stop the spill at the source.
- If the spill impacts a water resource, contain the spill through the use of appropriately deployed containment materials (e.g., sorbent booms, absorbent pads, constructing dikes) and then collect the sorbent materials and skim off water surfaces with booms. Excavate any contaminated soil.
- If the spill occurs in an upland, excavate the contaminated soil.
- Properly store, handle, and dispose of waste materials, using the contractor's designated spill response firm as appropriate.
- Restore the areas affected by the spill (if necessary, post-cleanup samples will be taken and provided to UI to verify that the spilled material has been successfully removed).

### 3.3 Spill Notifications

#### 3.3.1 Notifications to Federal, State, and Local Agencies

In Connecticut, a spill, as defined in Connecticut General Statutes (CGS) Section 22a-450, means the discharge, spillage, uncontrolled loss, seepage, or filtrations of oil or petroleum or chemical liquids or solid, liquid or gaseous products or hazardous waste that poses a potential threat to human health or the environment. Reportable spills to the CTDEEP includes any quantity when released to a waterway, released from a UST, release of PCB, halogenated solvent, or certain pesticides, any quantity of an unknown substance, a release or imminent release posing a risk or potential risk to human health, public safety, or environment, or a release containing equal to or greater than 30% of any material listed in Appendix A of Title 40, Code of Federal Regulations, Chapter I, Subchapter J, Part 355. Furthermore, other releases classified under the CGS Section 22a-450 shall also be reported to the CTDEEP. **All spills, regardless of quantity or material, will be reported to UI for internal tracking.**

**Project construction contractors are responsible for reporting spills based on Release Reporting Regulations to CT DEEP. Spills must be reported immediately (24/7) to:**

**CT DEEP Emergency Response and Spill Prevention Division  
860-424-3338 or toll free at 866-337-7745 (866-DEP-SPIL)**

**If the above numbers are unavailable for any reason, call 860-424-3333**



When notifying CT DEEP, obtain the CT DEEP representative's badge number and record the Spill Identification Number assigned to the incident by CT DEEP. Provide the following information:

- Location of spill;
- Quantity and type of substance, material, or waste released;
- Date and cause of the incident;
- Name and address of the owner;
- Name and address of the person making the report, and their relationship to the owner.

In addition to the notification to CT DEEP, some spills may be reportable to the Federal government. An oil spill must be reported to the Federal government if the spill is to a navigable waterbody (the Project area is not near any navigable waterbodies); water quality standards could be violated; the spill causes a sheen or discoloration; or the spill causes a sludge or emulsion. Spills of hazardous chemicals must also be reported to the Federal government, depending on the quantity of the material spilled and if the release could threaten human health.

The Federal reportable spill quantities for hazardous materials are listed in 40 CFR, Part 302.4 (refer to the table entitled "List of Hazardous Substances and Reportable Quantities")<sup>1</sup>. Incidents that are required to be reported under the Federal Emergency Planning and Community Right-to-Know Act or other prevailing/applicable Federal law are reportable to:

- The State Emergency Response Commission (CT DEEP at 860-424-3338);
- The National Response Center at 800-424-8802; and,
- The local community emergency coordinator.

A report by the Project construction contractor to the local fire department is also recommended (911 throughout Connecticut).

### **3.3.2 Notification and Reporting to UI**

In addition to notifying the CT DEEP, the construction contractor or other Project personnel who first observe a spill will, first, provide immediate verbal notification to UI.<sup>2</sup> Within 24 hours of a spill, the

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<sup>1</sup> Available online at: <http://www.gpo.gov/fdsys/pkg/CFR-2010-title40-vol27/pdf/CFR-2010-title40-vol27-sec302-4.pdf>

construction contractor will prepare and submit to UI a *Spill Report Form* (refer to Attachment E.1). This form must include the following information regarding the spill, along with any relevant supporting information (such as maps) and representative photographs:

- Date, time, and location of the spill;
- The quantity and type of the substance, material, or waste spilled;
- Circumstances that caused the spill;
- List of water resources affected or potentially affected by the release (if applicable);
- Statement verifying whether a sheen is present;
- Size of the affected area;
- Estimate of the depth that the material has reached in water or in soil;
- Determination of whether the release has or will migrate off Project work areas;
- Determination of whether the release is under control;
- Status of the cleanup effort and a description of the methods used (or to be used) to clean up the release;
- Name(s), company affiliation(s), and address(es) of the personnel who identified the release;
- List of any soil and water samples taken;
- Names of contacts made to federal, state, and local agencies, as applicable, and time of report (include, at minimum, CT DEEP representative's badge number and the CT DEEP-assigned spill identification number); and
- Name, address, and company affiliation of the person who completed the *Spill Report Form*.

### 3.4 Spill Cleanup

The Project construction contractors, or the contractor's licensed spill response firm, will clean up all spills promptly using appropriate containment and cleanup measures.

Small spills may be contained and cleaned up by Project construction crews using the on-site spill containment and cleanup materials. In such cases, all contaminated materials will be properly handled, contained, and transported in secure containment to a staging area for pick-up and ultimate disposal by the construction contractor's designated and pre-approved spill response firm.

***In no case will spilled or contaminated materials (including waste oils) be buried or otherwise disposed of on the Project site.***

If the Project construction contractor determines that a release cannot be adequately excavated and disposed of by its construction crews alone, the contractor will contact the designated, licensed spill response firm. Any such cleanup must be performed by a licensed spill response contractor, as required by CGS Section 22a-454. The Project construction contractor will work with the spill response contractor(s) and will verify that all excavated waste is handled correctly and transported to a licensed disposal facility.

### **3.5 Penalties for Non-Reporting**

Any person who fails to report incidents as required by CGS Section 22a-450 may be fined by CT DEEP not more than \$5,000 and the employer of such person not more than \$10,000. Failure to report incidents, as required by the Project, can result in removal from the Project or termination.

# **ATTACHMENT B.1**

## **Spill Report Form**

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## SPILL REPORT FORM OLD TOWN SUBSTATION REBUILD PROJECT

**Date:** \_\_\_\_\_ **Time of Spill Occurrence:** \_\_\_\_\_

**Name/Title of the first observer:** \_\_\_\_\_

**Regulatory Agencies Notified / Time & Date of Notification** (use reverse side if needed; include CT DEEP representative badge number and CT DEEP-assigned spill identification number): \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

**Location of Spill: Line List No.** \_\_\_\_\_ **Municipality** \_\_\_\_\_ **(Fairfield County)**

**Nearest Public Road:** \_\_\_\_\_ **Nearest Transmission Structure No.:** \_\_\_\_\_

**Nearest Street Address or landmark:** \_\_\_\_\_

**Attachments (circle all that apply):**            map                      photographs                      other \_\_\_\_\_

**Type of material spilled:** \_\_\_\_\_

**Quantity spilled (circle one):**            10 gals. or less                      10 - 1,000 gals.                      Over 1,000 gals.

**Specify approximate amount spilled:** \_\_\_\_\_

**Circumstances causing spill:** \_\_\_\_\_  
\_\_\_\_\_

**Size of area affected by spill:** \_\_\_\_\_ **Estimate depth of spilled material on water or soil:** \_\_\_\_\_

**If spill is into water, is a sheen present? (circle one):**                      YES                      NO

**Does spill extend off Project work areas? (circle one):**                      YES                      NO

**Is spill under control? (circle one):**                      YES                      NO\*

\*If NO, is there a potential for the spill to leave the

UI property?    Staging area? **(circle one):**                      YES                      NO

**Has spill cleanup begun? (circle one):**                      YES\*\*                      NO

\*\*If YES, what methods are being or will be used?: \_\_\_\_\_  
\_\_\_\_\_

**Have soil and/or water samples been taken? (circle one)**                      YES\*\*\*                      NO

\*\*\*If YES, list sample types: \_\_\_\_\_

**Signature of Contractor Representative/Date:**

**Signature of Designated Project Representative/Date:**

**Print Name/Title:** \_\_\_\_\_

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## **APPENDIX C**

### **SNOW REMOVAL AND DE-ICING METHODS**



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## INTRODUCTION

### 1.1 Applicability

The construction of the Old Town Substation Rebuild Project (Project) will be performed over a multi-year period. As a result, The United Illuminating Company (UI, the Company) acknowledges that construction activities will require work during the winter, when periods of snow and ice will occur. The removal of ice and snow from the work site, including access roads and the staging area/contractor yard, will be critical to allow construction activities to proceed safely. However, snow removal and de-icing must be performed to protect the environment, in accordance with regulatory requirements.

This document presents the procedures that will apply during construction when snow or ice must be removed from Project work sites. The procedures:

- (a) Define responsibility for snow removal and disposal (Section 1.2);
- (b) Describe the typical methods for removing snow and ice from work sites safely and in conformance with environmental requirements (Section 2); and
- (c) Identify protocols for the removal of snow accumulations to appropriate disposal sites, if needed (Section 3).

In addition, snow removal and disposal activities must be in accordance with the applicable provisions of the Connecticut Department of Energy and Environmental Protection's (CT DEEP's) Best Management Practices (BMPs) for disposal of snow accumulations from roadways and parking lots. The CT DEEP BMPs are included in Attachment C.1 and also can be found on the CT DEEP website at: <https://portal.ct.gov/DEEP/Water-Regulating-and-Discharges/Guidance/Snow-Removal-Guidelines>

Under most circumstances, snow and ice are expected to be removed in accordance with the typical procedures described in Section 2. However, if winter weather conditions result in large snowfall amounts, snow accumulated and removed from Project work sites and access roads may have to be transported to designated disposal sites; in such cases, the procedures identified in Section 3 will be followed.

### 1.2 Responsibility

The Project construction contractor(s) will be responsible for implementing these snow removal and de-icing procedures. The construction contractor must identify and/or review designated snow disposal locations with UI, prior to use, to verify conformance to this plan. Any proposed deviations from these procedures must be justified by the contractor and will require UI's advance approval.

## 2. SNOW AND ICE REMOVAL FROM WORK SITES

The following procedures apply to the removal of snow and ice from Project work sites:

1. Snow may be removed by plowing (blading) and windrowing, or snow blowing, depending on the amount and type of snow and the area that must be cleared to allow Project construction to proceed.
2. Snow may be bladed level (rather than removed) along access roads to improve driving conditions. If appropriate, this technique also may be used at the substation site and staging area.
3. When removing or blading snow from access roads or work pads, contractors will attempt to avoid plowing up topsoil, subsoil, or gravel.
4. Any erosion and sedimentation controls damaged during the snow removal process will be repaired or replaced as soon as practical, taking into consideration snow depth and frozen ground. (Note: Winter weather conditions may preclude the re-establishment of damaged erosion and sedimentation controls until a thaw occurs or until spring.)
5. Sand, salt, sand/salt mix, or Calcium Magnesium Acetate (CMA) may be applied for traction and de-icing at the substation site, along access roads, on work pads, and at the staging area / contractor yard. CMA will be applied according to product specifications.
  - Project construction contractors will use the minimum amount of sand, salt, sand/salt mix, or CMA necessary to melt ice and to maintain safe working conditions.
  - When snowfall amounts exceed 4 inches, to clear snow from timber mats (or equivalent), the construction contractors will push or blow clean snow off the mats, down to approximately 3 inches. This clean snow will be windrowed along either side of the matted area (work pad or access road). The bottom 3 inches of snow, which is likely to be mixed with sand, salt, or dirt from general construction activities, will either be carefully plowed into a small stockpile on the mats or loaded into a truck or equivalent for removal from the timber mats and transported to an upland area.
  - When snowfall amounts are less than approximately 4 inches, all snow will be either carefully plowed into a small stockpile and contained on the mats or scraped off the timber mats and moved to upland areas.
  - The sand/dirt that may be left after the small stockpiles of snow melt on the construction mats will be swept and disposed of properly.

During extreme weather events, this protocol may be amended as needed to address immediate worker safety issues or to prevent significant damage to property.

### 3. SNOW ACCUMULATION DISPOSAL AREAS

#### 3.1 General

Snow will typically be plowed from access roads, work pads, and other work sites pursuant to the procedures described in Section 2. However, in some cases, accumulated snow may need to be removed from work sites (using front-end loaders, trucks, or equivalent equipment) and transported to snow accumulation areas for disposal.

Such snow accumulation disposal areas must be located in uplands or on other Project staging and support sites. UI must approve, in advance, the use of any site for accumulated snow disposal. With the pre-approval of UI, accumulated snow may be stockpiled on flat, paved, or graveled parking areas, provided the conditions of these procedures are otherwise met.

**Accumulated snow will NOT be disposed of in the following areas\*:**

- 1. In any water resources (e.g., wetlands, ponds, watercourses, ditches, swales). \***
- 2. On top of stormwater catch basins or in stormwater drainage swales or ditches. \***
- 3. On private property immediately adjacent to a residential area without the prior approval of the property owner.**

*\*unless authorized by government officials*

Snow accumulations placed on pervious surfaces must be located to allow snow melt water to infiltrate into the soil, without causing sedimentation into water resources. Any access road or work pad materials that are inadvertently mixed with the snow accumulations must be collected and removed from the Project area, when possible, after snow melt in the spring.

Snow stored on asphalt or concrete must not be piled on top of manholes or catch basins.

#### 3.2 Typical Snow Accumulation Disposal Areas

Snow accumulation sites typically will be located near Project access roads, at least 50 feet from water resources, in non-environmentally sensitive areas, and/or in Project-approved designated staging areas.

If accumulated snow must be disposed of in other locations (e.g., municipally-approved snow disposal sites), UI's Project construction contractor must obtain and provide documentation to UI of all applicable approvals and any conditions relating to the use of the disposal site(s).

### **3.3 Snow Disposal Options when Identified Accumulation Areas are Fully Utilized**

Depending on snowfall amounts, it is possible that all snow accumulation disposal areas adjacent to Project work areas in uplands could be fully utilized and that additional accumulation sites or other snow disposal options will need to be considered. Under such circumstances, the Project contractor must coordinate with UI to define the most appropriate option.

New snow accumulation sites must be pre-approved by UI and will likely require prior coordination with and/or approval from private landowners or municipal authorities.

## **ATTACHMENT C.1**

### **Connecticut Department of Energy and Environmental Protection**

#### **Best Management Practice for Disposal of Snow Accumulations from Roadways and Parking Lots**



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## Connecticut Department of Energy & Environmental Protection

### Best Management Practices for Disposal of Snow Accumulations from Roadways and Parking Lots

**Purpose:** These guidelines have been developed to clarify DEEP recommendations to state and municipal officials, and others regarding the removal and disposal of snow accumulations from roadways and parking lots. For purposes of this guidance snow accumulations refers to snow banks and snow piles that are removed by front-end loader or by loading on trucks for disposal. This guidance does not apply to normal snow plowing operations that must, inevitably, discharge some snow into wetlands and watercourses.

**Implementation:** While following these guidelines does not constitute a permit or authorization, the Department recognizes there is a considerable need for flexibility in implementation of this policy, particularly in emergency situations. There is no intent to interfere with snow plowing operations. Where trucking and snow dumping operations are undertaken the Department recommends these guidelines be followed.

**Problem:** Current road maintenance activities include removal of snow accumulations from bridges, roads and parking areas for the purpose of providing more space for subsequent snow storms and for ease of travel and parking. Sometimes this snow is moved by truck or with a front-end loader and deposited directly into surface waters of the state including streams, wetlands and Long Island Sound. This practice is not recommended due to the presence of dirt, salt, litter and other debris, which are routinely mixed in the accumulated snow.

Under normal conditions of snowmelt, the majority of these contaminants remains on or next to the paved surface or may be captured in stormwater catch basins. These contaminants can then be swept from streets and bridges or vacuumed from catch basin sumps. However, when accumulated snow is collected and dumped into surface waters, this mixture of snow, sand and debris may smother aquatic life in the bottom of streams and rivers and degrade the aesthetics of the surface water with silt plumes and litter. Large quantities of snow (and the sand and debris) may also cause blockage of storm drainage systems, resulting in increased chance for localized flooding.

**Recommended Management Practice:** Snow accumulations removed from roadways, bridges, and parking lots should be placed in upland areas only, where sand and other debris will remain after snowmelt for later removal. Care must be exercised not to deposit snow in the following areas:

- freshwater or tidal wetlands or in areas immediately adjacent to such areas where sand and debris may be flushed during rainstorms;
- on top of storm drain catch basins;
- in storm drainage swales;
- on stream or river banks which slope toward the water, where sand and debris can get into the watercourse; and
- in areas immediately adjacent (within at least 100 feet) of private or public drinking water well supplies (due to the possible presence of road salt).

**For Governmental Entities:** In normal winter conditions, governmental entities should follow the recommended management practices outlined above. In extraordinary winter conditions, the commissioner may, upon public notification, offer governmental entities the flexibility of limited in-water disposal. When such flexibility is offered, governmental entities who have determined that extraordinary circumstances exist where all upland, land-based disposal options have been fully exhausted (i.e., disposal capacity is not available) and snow needs to be removed to meet public safety demands (i.e., clear access ways for police, emergency medical and fire responders), may use certain waterways for snow disposal in accordance with the following conditions:

- Upland storage and disposal of snow (i.e., athletic fields, parks and other flat, open-field sites) and other snow management methods (i.e., snow melting equipment) must be the first alternatives explored and exhausted. Environmentally sensitive areas must be avoided;
- This guidance applies only to snow and ice which is not visibly contaminated with material other than salt and sand from road clearing activities;
- For coastal communities, preference should be given to snow disposal in salt water where available;
- Disposal in rivers or streams must be limited to those water bodies that have adequate flow and mixing and are not prone to ice jams;
- The disposal must occur only in open water in areas that will not interfere with navigation;
- Disposal must be conducted in a manner so as to prevent ice dam formation or damage to bridges, docks or other structures;
- Disposal in ponds and lakes is discouraged;
- There shall be no disposal in coastal or freshwater wetlands, eelgrass beds, vegetated shallows, vernal pools, shellfish beds mudflats, public water supply reservoirs and their tributaries, or other areas designated as being environmentally sensitive;
- The activity must comply with local laws and requirements;
- Precautions must be taken to avoid shoreline or stream bank damage or erosion from truck/equipment activity; and
- Governmental entities must notify the Department by email (address email to [dahlia.gordon@ct.gov](mailto:dahlia.gordon@ct.gov)) prior to disposing of snow and ice in waterways or, if advance notification is not possible, then the Department must be contacted as soon as possible after snow disposal has begun.

**Notification:** Notification can be made by addressing an email to Kevin Sowa at: [dahlia.gordon@ct.gov](mailto:dahlia.gordon@ct.gov). The notification must include the following: (1) the name of the governmental entity making the notification; (2) contact information for the governmental entity including name, email address and phone number; (3) the street address where the snow disposal activity will occur; (4) the name of the waterbody where the snow will be disposed; (5) the estimated quantity of snow to be disposed; (6) the dates during which the disposal activity will occur; and (7) a statement that the governmental entity has exhausted all disposal alternatives and snow management methods and will make best efforts to adhere to these snow disposal guidelines.

**Information:** For further information please call the Water Permitting and Enforcement Division Engineer of the Day at 860-424-3025.

Updated February 2020

**APPENDIX D**

**D&M PLAN DIRECTORY  
AND  
CROSS-REFERENCES TO CSC CONDITIONS IN  
DOCKET NO. 490**

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**Table D-1: D&M Plan Checklist for the Old Town Substation Rebuild Project  
(Pursuant to RCSA Section 16-50j-60)**

| R.C.S.A Section  | Description   | Location Addressed in D&M Plan (Section Reference, as Applicable) |
|------------------|---|---|
| <b>16-50j-60</b> | <b>Requirements for a D&amp;M Plan</b>  |   |
| (a)              | <b>Purpose.</b><br>The Council may require the preparation of full or partial D&M Plans for proposed energy facilities, modifications to existing energy facilities, or where the preparation of such a plan would help significantly in balancing the need for adequate and reliable utility services at the lowest reasonable cost to consumers with the need to protect the environment and the ecology of the state.  | D&M Plan (all)  |
| (b)              | <b>When required.</b><br>A partial or full D&M plan shall be prepared in accordance with this regulation and shall include the information described in RCSA Sections 16-50j-61 to 16-50j-62, inclusive, for any proposed energy facility for which the Council issues a certificate of environmental compatibility and public need, except where the Council provides otherwise at the time it issues the certificate. Relevant information in the Council's record may be referenced.   | D&M Plan (all)  |
| (c)              | <b>Procedure for preparation.</b><br>The D&M plan shall be prepared by the certificate holder or the owner or operator of the proposed facility or modification to an existing facility. The preparer may consult with the staff of the Council to prepare the D&M plan.  | D&M Plan (all)  |
| (d)              | <b>Timing of plan.</b><br>The D&M plan shall be submitted to the Council in one or more sections, and the Council shall approve, modify, or disapprove each section of the plan not later than 60 days after receipt of it. If the Council does not act to approve, modify or disapprove the plan or a section thereof within 60 days after receipt of it, the plan shall be deemed approved. Except as otherwise authorized by the Council, no clearing or construction shall begin prior to approval of applicable sections of the D&M plan by the Council. | D&M Plan (all)  |
| <b>16-50j-61</b> | <b>Elements of D&amp;M Plan</b>   |   |
| (a)              | <b>Key Map.</b><br>1"=2,000' USGS topographic map   | Section 1, Appendix A   |
| (b)              | <b>Plan Drawings.</b><br>1"=100' or larger, and supporting documents, which shall contain the following information:  | Volume 2  |
| 1.               | Edges of the proposed site and any existing site contiguous to or crossing the site, portions of the site owned by the company in fee, and the identity of property owners of record of the portions of the site not owned by the company in fee  | Volume 2  |
| 2.               | Public roads and public land crossings or adjoining the site  | Volume 2  |
| 3.               | Location of 50' contours along the site   | Volume 2  |
| 4.               | Probable location, type, and height of the proposed facility and components including each new transmission structure, position of guys, description of foundations, and locations of any utility or other structures to remain on the site or to be removed  | Volume 2  |
| 5.               | Probable points of access to the site, and the route and likely nature of accessways, including alternatives  | Volume 2  |
| 6.               | Edges of existing and proposed clearing areas, the type of proposed clearing along each part of the site, and the location and species identification of vegetation that would remain for aesthetic and wildlife value  | Section 4, Volume 2   |
| 7.               | Identification of sensitive areas and conditions within and adjoining the site, including but not limited to:   |   |
|                  | A. Wetland and watercourse areas regulated under C.G.S. Chapter 440 and any locations where construction may create drainage problems   | Section 4, Volume 2   |
|                  | B. Areas of high erosion potential  | Section 4, Volume 2   |
|                  | C. Critical habitats or areas identified as having rare, endangered, or threatened, or special concern plant or animal species listed by the state or federal government  | Section 4   |
|                  | D. Location of known underground utilities or resources to be crossed (electric lines, fuel lines, drainage systems and natural or artificial public or private water resources)  | Volume 2  |

| R.C.S.A Section  | Description  | Location Addressed in D&M Plan (Section Reference, as Applicable) |
|------------------|--|---|
|                  | E. Residences or businesses within or adjoining the site that may be disrupted during construction   | Volume 2  |
|                  | F. Significant environmental, historic and ecological features (significantly large or old trees, buildings, monuments, stone walls or features of local interest)   | Section 4   |
| <b>(c)</b>       | <b>Supplemental Information</b>  |   |
| <b>1.</b>        | Plans (if any) to salvage marketable timber, restore habitat and maintain snag trees within or adjoining the site  | Section 4   |
| <b>2.</b>        | All construction and rehabilitation procedures with reasonable mitigation that shall be taken to protect areas and conditions identified in 7(b), above, including but not limited to:   |   |
|                  | A. Construction techniques at wetland and watercourse crossings  | Section 4, Volume 2   |
|                  | B. S&E control and rehabilitation procedures, consistent with the CT Guidelines for Soil Erosion and Sediment Control, as updated and amended for areas of high erosion potential  | Appendix A  |
|                  | C. Precautions and all reasonable mitigation measures to be taken in areas within or adjoining the site to minimize any adverse impacts of such actions or modifications endangered, threatened, or special concern plant or animal species listed by federal or state agencies and critical habitats that are in compliance with federal and state recommended standards and guidelines, as amended | Section 4   |
|                  | D. Plans for modification and rehabilitation of surface, drainage, and other hydrologic features   | Volume 2  |
|                  | E. Plans for watercourse bank restoration in accordance with Chapter 440 of the CGS  | Section 4   |
|                  | F. Plans for the protection of historic and archaeological resources with review and comment from a state historic preservation office of the CT DECD or its successor agency.   | N/A (no cultural resources)                                       |
| <b>3.</b>        | Plans for the method and type of vegetation clearing and maintenance to be used within or adjacent to the site   | Section 4   |
| <b>4.</b>        | Location of public recreation areas or activities known to exist or being proposed in or adjacent to the site, together with copies of agreements between the company and public agencies authorizing the public recreation use of the site to the extent of the company's rights thereto  | Volume 2  |
| <b>5.</b>        | Plans for ultimate disposal of excess excavated material, stump removal, and periodic maintenance of the site  | Section 4   |
| <b>6.</b>        | Locations of areas where blasting is anticipated   | Not anticipated   |
| <b>7.</b>        | Rehabilitation plans, including but not limited to reseeding and topsoil restoration   | Section 4, Volume 2   |
| <b>8.</b>        | Contact information for the personnel of the contractor assigned to the project  | Section 3   |
| <b>9.</b>        | Such site-specific information as the CSC may require  | D&M Plan  |
| <b>(d)</b>       | <b>Notice</b><br>A copy, or notice of the filing, of the D&M Plan, or a copy, or notice of the filing of any changes to the D&M Plan, or any section thereof, shall be provided to the service list and the property owner of record, if applicable, at the same time the plan, or any section thereof, is submitted to the CSC  | Section 9   |
| <b>(e)</b>       | <b>Changes to the Plan</b><br>The CSC may order changes to the D&M plan, including but not limited to vegetative screening, paint color, or fence design at any time during the preparation of the plan  | Section 9   |
| <b>16-50j-62</b> | <b>Supplemental Reporting Requirements</b>   |   |
| <b>(a)</b>       | <b>Site Testing and Staging Areas.</b><br>The certificate holder, or facility owner or operator, shall provide the CSC with written notice of the location and size of all areas to be accessed or used for site testing or staging areas. If such an area is to be used prior to approval of the D&M plan, the CSC may approve such use on terms as it deems appropriate.                           | Volume 2  |
| <b>(b)</b>       | <b>Notice</b>  |   |
| <b>1.</b>        | The certificate holder, or facility owner or operator, shall provide the CSC, in writing with a minimum of two weeks advance notice of the beginning of:   | Acknowledged  |
|                  | A. Clearing and access work in each successive portion of the site, and  |   |

| R.C.S.A Section | Description  | Location Addressed in D&M Plan (Section Reference, as Applicable) |
|-----------------|--|---|
|                 | B. Facility construction in that same portion  |   |
| 2.              | <p>The certificate holder, or facility owner or operator, shall provide the CSC with advance written notice whenever a significant change of the approved D&amp;M plan is necessary. If advance written notice is impractical, verbal notice shall be provided to the CSC immediately and shall be followed by written notice not later than 48 hours after the verbal notice. Significant changes to the approved D&amp;M plan shall include, but not be limited to, the following:</p> <p>A. The location of wetland or watercourse crossings</p> <p>B. The location of an accessway or structure in a regulated wetland or watercourse area</p> <p>C. The construction or placement of any temporary structures or equipment</p> <p>D. A change in structure type or location including, but not limited to, towers, guy wires, associated equipment or other facility structures</p> <p>E. Utilization of additional mitigation measures, or elimination of mitigation measures. The CSC or its designee shall promptly review the changes and shall approve, modify, or disapprove the changes in accordance with subsection (d) of Section 16-50j-60 of the RCSA</p> | Acknowledged  |
| 3.              | The certificate holder, or facility owner or operator, shall provide the CSC with a monthly construction progress report or a construction progress report at intervals determined by the CSC or its designee, indicating changes and deviations from the approved D&M Plan. The CSC may approve changes and deviations, request corrections, or require mitigation measures.  | Acknowledged  |
| 4.              | The certificate holder, or facility owner or operator, shall provide the CSC with written notice of completion of construction and site rehabilitation.  | Acknowledged  |
| (c)             | <p><b>Final Report</b></p> <p>The certificate holder, facility owner or operator, shall provide the CSC with a final report for the facility not later than 180 days after completion of all site construction and site rehabilitation. The report shall identify:</p>   | Acknowledged  |
| 1.              | All agreements with abutters or other property owners regarding special maintenance precautions  |   |
| 2.              | Significant changes of the D&M plan that were required because of property rights of underlying and adjoining owners for other reasons   |   |
| 3.              | The location of construction materials which have been left in place including, but not limited to, culverts, erosion control structures along watercourses and steep slopes, and corduroy roads in regulated wetlands   |   |
| 4.              | The location of areas where special planting and reseeding have been done  |   |
| 5.              | <p>The actual construction cost of the facility, including but not limited to the following costs:</p> <p>A. Clearing and access</p> <p>B. Construction of the facility and associated equipment</p> <p>C. Rehabilitation; and</p> <p>D. Property acquisition for the site or access to the site</p>   |   |
| (d)             | <p><b>Protective Order</b></p> <p>The certificate holder, or facility owner or operator, may file a motion for protective order pertaining to commercial or financial information related to the site or access to the site.</p>   | N/A   |



**Table D-2**  
**D&M Plan Directory of Docket No. 490 Decision and Order Conditions**

| Condition or Page Number | Decision and Order Condition Description   | D&M Plan (Section Reference, as Applicable) |
|--------------------------|--|---|
| (1)                      | The Certificate Holder shall prepare a Development and Management (D&M) Plan for this site in compliance with Sections 16-50j-60 through 16-50j-62 of the RCSA. The D&M Plan shall be submitted to and approved by the Council prior to the commencement of facility construction and shall include:   | D&M Plan                                    |
|                          | a. A final site plan showing the placement of all substation equipment, structures, and buildings within the substation perimeter, tap structures, access, landscaping, and fencing;   | Volume 2                                    |
|                          | b. An erosion and sedimentation control plan, consistent with the <i>2002 Connecticut Guidelines for Soil Erosion and Sediment Control</i> ;   | Sections 3-6; Appendix A                    |
|                          | c. A spill prevention, control, and countermeasure plan;   | Appendix B                                  |
|                          | d. Details of the transmission interconnections; and   | Sections 1-4, 5; Volume 2                   |
|                          | e. A decommissioning plan for the existing Old Town Substation with or without the removal of the foundations.   | Section 5, Volume 2                         |
| (2)                      | Eversource shall prepare a partial D&M Plan for its portion of the Project.  | Refer to separate Eversource D&M Plan       |
| (3)                      | The Certificate Holder shall comply with all future electric and magnetic field standards promulgated by state or federal regulatory agencies. Upon the establishment of any new standards, the facilities granted in this Decision and Order shall be brought into compliance with such standards as soon as practical.   | Acknowledged                                |
| (4)                      | The Certificate Holder shall provide the Council with a copy of necessary permits from any other state or federal agency with concurrent jurisdiction prior to the commencement of construction.'  | Section 8, Acknowledged                     |
| (5)                      | In accordance with Section 16-50j-62 of the RCSA, the Certificate Holder shall provide the Council with written notice two weeks prior to the commencement of site construction activities. In addition, the Certificate Holder shall provide the Council with written notice of the completion of site construction, and the commencement of substation operation.  | Section 9                                   |
| (6)                      | The Certificate Holder shall notify the Council no less than 60 days prior to when the substation operations terminate.  | Acknowledged                                |
| (7)                      | Unless otherwise approved by the Council, this Decision and Order shall be void if all construction authorized herein is not completed within five years of the effective date of the Decision and Order, or within five years after all appeals to this Decision and Order have been resolved. Authority to monitor or modify the schedule, as necessary, is delegated to the Executive Director. The Certificate Holder shall provide written notice to the Executive Director of any schedule changes as soon as practicable. | Acknowledged, Section 9                     |
| (8)                      | Any request for extension of the time period referred to in Condition 7 shall be filed with the Council not later than 60 days prior to the expiration date of this Certificate and shall be served on all parties and intervenors, as listed in the service list, and the City of Bridgeport. Any proposed modifications to this Decision and Order shall likewise be so served.  | Acknowledged                                |

| Condition or Page Number | Decision and Order Condition Description  | D&M Plan (Section Reference, as Applicable) |
|--------------------------|---|---|
| (9)                      | The Certificate Holder shall remit timely payments associated with annual assessments and invoices submitted by the Council for expenses attributable to the facility under CGS §16-50v.  | Acknowledged                                |
| (10)                     | This Certificate may be transferred in accordance with CGS §16-50k(b), provided both the Certificate Holder/transferor and the transferee are current with payments to the Council for their respective annual assessments and invoices under CGS §16-50v. In addition, both the Certificate Holder/transferor and the transferee shall provide to the Council a written agreement as to the entity responsible for any quarterly assessment charges under CGS §16-50v(b)2 that may be associated with this facility. | Acknowledged                                |
| (11)                     | The Certificate Holder shall maintain the facility, substation components, landscaping, and drainage features, in a reasonable physical and operational condition that is consistent with this Decision and Order and the Development and Management Plan to be approved by the Council.  | Acknowledged                                |
| (12)                     | If the Certificate Holder is a wholly-owned subsidiary of a corporation or other entity and is sold/transferred to another corporation or other entity, the Council shall be notified of such sale and/or transfer and of any change in contact information for the individual or representative responsible for management and operations of the Certificate Holder within 30 days of the sale and / or transfer.  | Acknowledged                                |
| (13)                     | This Certificate may be surrendered by the Certificate Holder upon written notification to the Council.   | Acknowledged                                |