

**Modified Spill Prevention, Control and Countermeasure Plan (SPCC)
And Soil Contact Best Practices Plan**

For Construction Activities at:

Greenskies Clean Energy, LLC
Mulnite Farms, Barber Hill Road, East Windsor, CT
32 Acre - 4.9 -megawatt-AC Solar Photovoltaic electric generating facility
CSC Petition 1422

Plan Prepared For:

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Plan Prepared By:

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SECTION 1: INTRODUCTION

This plan offers recommendations to be followed during the construction of the 32 Acre - Mulnite Farms 4.9-megawatt-AC Solar Photovoltaic electric generating facility in East Windsor Connecticut. The purpose of this plan is to:

- A) Limit pollution generating activity from use of construction equipment fuels and lubricants, and;
- B) Limit exposures during construction from agricultural chemical residues that may exist in soil.

SECTION 2: POLLUTION PREVENTION STANDARDS – CONSTRUCTION EQUIPMENT

2.1 Potential Construction Site Pollutants

Pollutant-Generating Activity	Pollutants or Pollutant Constituents (that could be discharged if exposed to stormwater)	Location on Site
Equipment Re-fueling	Diesel Fuel, Gasoline	Staging Area
Leaking or Broken Hydraulic Lines	Hydraulic Oil	Construction Work Areas and Staging Area
Minor Equipment Maintenance	Diesel Fuel, Gasoline, Hydraulic Oil, Motor Oil, Anti-Freeze	Staging Area
Vehicle Accident	Diesel Fuel, Gasoline	Entire Site

2.2 Spill Prevention and Response

In accordance with 40 CFR 112, a Spill Prevention, Control and Countermeasure (SPCC) Plan is required for non-transportation related facilities with an aboveground oil storage capacity greater than 1,320 gallons, or with an underground oil storage capacity greater than 42,000 gallons if the tanks are not maintained in accordance with a state or federal underground storage tank program. For construction projects, the SPCC Plan threshold is typically triggered when diesel fuel, hydraulic oil, lubricating oil, gasoline, and/or other oil products are stored on site, and the cumulative volume of the aboveground storage of these oil products exceeds 1,320 gallons. Note that only tanks, containers, and drums with a capacity of 55 gallons or greater are considered in the cumulative volume calculation.

For this project, the proposed aboveground oil storage capacity will not exceed 1,320 gallons. As such, an SPCC Plan is not required. However, this modified plan is offered to describe best management practices for fuel storage, equipment refueling and spill management at the construction Site. The Site Contractor or Subcontractor is required to read and sign this Plan Acknowledgement in **Appendix A**. Should a spill or release incident occur, the contractor, in consultation with the Spill Coordinator will make necessary arrangements to notify the Connecticut DEEP and Emergency Response Contractor and complete the Spill Incident Log included in **Appendix B**.

Emergency Spill Notification Procedures

All leaks, spills, and releases, regardless of size or quantity, will be reported to the spill coordinator or assistant spill coordinator. The coordinator will decide appropriate response actions, reporting requirements, and assign personnel to address the situation.

The Connecticut Department of Energy and Environmental Protection (CT DEEP) must be notified as soon as there is knowledge of a leak, spill, or release of oil or hazardous material.

Emergency spill notification contact information is provided below:

Spill and Safety Coordinator

Name: Paul Tanner, LEP – O'Reilly Talbot & Okun Associates, Inc.

Phone: 860-604-2536

Email: tanner@oto-env.com

Assistant Spill and Safety Coordinator

Mr. Steve Kochis

Phone: 860-807-4375

Email: skochis@vhb.com

Connecticut DEEP (Spill Reporting Line, Emergency Response Unit)

Phone: 860-424-3338 or toll free 1-866-337-7745 (24 hour line)

Local Emergency Contacts:

Emergency - Dial 911

Non-emergency calls – Broad Brook Fire Department (860) 623-5940

East Windsor Fire Marshal – (860) 990-3846

Emergency Response Contractors

Environmental Services, Inc. (Primary Contractor)
Phone: 860-528-9500
CYN Environmental (Alternate Contractor)
Phone: 800-494-4394

2.3 Fueling and Maintenance of Equipment or Vehicles

General

Equipment fueling and maintenance will be conducted in a supervised manner to reduce the possibility of spills onto the permeable ground surface. Spills and releases will be contained and cleaned immediately using sorbent materials or other appropriate methods. Hosing down a spill or release is not permitted, as the runoff could enter a storm drain inlet and impact receiving waters. Spills of any quantity require notification to the Spill Coordinator, and the Connecticut DEEP as described in Section 1.2.

Specific Pollution Prevention Practices

Drip Pans	
Description:	Drip pans will be used under leaky vehicles and equipment. Leaks will be repaired immediately. If immediate repair is not possible, due to the complexity, the leaking vehicle or equipment will be removed from the site and repairs will be made at a designated off-site maintenance facility.
Installation	At the start of the project and as needed thereafter during the project duration
Maintenance Requirements	Inspect construction vehicles daily, and repair any leaks immediately.
Design Specifications	N/A

Drain Pans	
Description: Drain pans will be used to collect fluids drained during routine vehicle or equipment maintenance. Emergency maintenance (such as replacement of a hydraulic hose) may be performed on-site, Routine maintenance (such as oil changes) and more extensive equipment maintenance and servicing will be performed off site.	
Installation	At the start of the project and as needed thereafter during the project duration
Maintenance Requirements	Inspect construction vehicles daily, and repair any leaks immediately.
Design Specifications	N/A

Fueling	
Description: Light construction support vehicles will be fueled off site at a service station. Construction equipment will be fueled on site in a supervised manner to avoid overfills. The equipment will be filled from either a portable fuel tank staged on site equipped with secondary containment, within the bed of a pickup truck, or from a fuel delivery truck. The equipment operator and/or designated fueling personnel will be present during the entire fueling operation to minimize the potential for a spill or overfill.	
Installation	Throughout the project duration
Maintenance Requirements	Inspect construction vehicles daily, and repair any leaks immediately.
Design Specifications	N/A

Spill Response Actions – Refueling or Vehicle Accident	
Description: All leaks or spills will be contained and cleaned up immediately using sorbent materials or other appropriate methods, and the source of the release will be repaired or eliminated. Note that any quantity of spilled fuel requires immediate notification to the Connecticut DEEP. Refer to Emergency Spill Notification Procedures in Section 1.2	
Installation	At the start of the project and as needed thereafter during the project duration
Maintenance Requirements	N/A
Design Specifications	N/A

Spill Response Supplies	
Description: The fuel supplier and re-fueling vehicle will have spill kits containing a sufficient supply of pads, booms, sorbent material (i.e., Speedy-Dri), shovels, and empty drums (as needed for placement of spent sorbent material used during the cleanup) will be maintained within the staging area.	
Installation	At the start of the project and as needed thereafter during the project duration
Maintenance Requirements	N/A
Design Specifications	N/A

Training

Description: Personnel will be trained on spill notification requirements, and the location and use of spill kits.	
Installation	At the start of the project and as needed thereafter during the project duration
Maintenance Requirements	N/A
Design Specifications	N/A

Waste Disposal	
Description: Disposal and/or recycling of spent sorbent materials, oil, or oily waste will be performed in accordance with local, state and federal regulations.	
Installation	As needed
Maintenance Requirements	N/A
Design Specifications	N/A

SECTION 3: SOIL EXPOSURE PREVENTION STANDARDS DURING CONSTRUCTION

Because the Site was a farm, there is the potential for agricultural chemical residue to persist in soil. This section includes construction worker safety procedures to limit contact with soil, incorporate dust suppression measures and provisions for soil anti-tracking pads and construction equipment cleaning prior to exiting the Site.

Each Site contractor is required to comply with all local, state, and federal safety standards and regulations. The Site Contractor or Subcontractor is required to read and sign this Plan Acknowledgement in **Appendix A**. Should an incident occur, the contractor, in consultation with the Safety Coordinator shall make necessary arrangements to modify work practices and complete the Incident Log included in **Appendix B**.

3.1 Potential Construction Site Pollutants

Potential Exposure Medium	Pollutants or Pollutant Constituents	Location on Site
Agricultural Chemical Residue in Soil	Pesticides, Herbicides, Fungicides that may persist and be attached to soil particles	Soil throughout at the Site

Agricultural chemical residues may be adhered to soil and are essentially non-volatile and will not be present in the air as a gas or vapor. Agricultural chemical residues could be present in the soil or the air adsorbed to dust.

3.2 Potential Routes of Exposure and Recommended Best Management Practices

Limit inhalation of dust, dermal exposure to contaminated soils, or ingestion due to contamination on hands. The following are suggestions for limiting exposure to soil.

On-Site Best Management Practices to Limit Exposures to Construction Workers

Inhalation: The potential for inhalation of agricultural chemical residue is low if dust suppression methods are employed. Control generation of dust by adding water to exposed soil as necessary.

Dermal contact: There is a moderate potential for dermal contact with soil potentially containing agricultural chemical residue during construction.

1. Avoid direct skin contact with soil.
2. Wear protective gloves when in contact with soils.
 - a. Protective Gloves: Gloves made of nitrile or other material suitable to prevent skin contact with soils should be worn when in contact with soil. Woven cloth gloves are not acceptable but may be used as liners underneath impermeable gloves.
3. Practice good personal hygiene. Wash hands thoroughly with soap and water as soon as possible after exposure. As a minimum, utilize commercially available wipes to clean hands regularly.
4. Remove soil from tools, equipment, boots, etc. prior to leaving the work-site, using water, detergent, paper towels, handi-wipes, etc.

Limit ingestion: Wash/clean hands and face prior to eating, drinking, chewing or smoking. Wash hands and face thoroughly with soap and water before lunch or coffee breaks, and as soon as practicable after finishing work for the day.

Off-Site - Recommended Practices to Limit Exposures at Site Construction Entrances

Procedures to Limit Soil Tracking off-Site: The potential for exposure to Site soil at construction entrances is minimized by using soil anti-tracking pads and cleaning construction equipment prior to exiting the Site. Anti-tracking pads can be effective in removing soil adhered to vehicle tires and should be inspected and maintained periodically to confirm their effectiveness. Construction equipment should be free of soil when leaving the site. We recommend the pavement at construction entrances be inspected on a daily basis to confirm that soil remains on Site. Periodic sweeping of paved surfaces at entrances can be employed as needed to further limit movement of Site soil.

Appendix A – Contractor Certifications/Agreements

CONTRACTOR CERTIFICATION

Modified Spill Prevention and Countermeasures Plan and Soil Contact Best Practices Plan

Project Number: _____

Project Title: _____

Operator(s): _____

As a subcontractor, you are required to comply with the modified Spill Prevention and Countermeasures Plan and Soil Contact Best Practices Plan for any work that you perform on-site. Any person or group who violates any condition of the Plan may be subject to substantial penalties or loss of contract. You are encouraged to advise each of your employees working on this project of the requirements of the Plan. A copy of the Plan is available for your review at the office trailer.

Each subcontractor engaged in activities at the construction site that could impact groundwater or stormwater resources must be identified and sign the following certification statement:

I certify that I have read and understand the terms and conditions of the Spill Prevention and Countermeasures Plan for the above designated project and agree to follow the practices described in the Plan.

This certification is hereby signed in reference to the above named project:

Company: _____

Address: _____

Telephone Number: _____

Type of construction service to be provided: _____

Signature: _____

Title: _____

Date: _____

Appendix B – Spill and Soil Contact Incident Log

Date	Description of Activity when Spill or Incident was Discovered	Description of Remediation Measure and Location, Contacts Made, and CT DEEP Spill Notification Number (as applicable)	Follow – up Actions and Resolution/Remediation Details