

Via First Class Mail and Electronic Mail (siting.council@ct.gov)

May 3, 2023

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

Re: **PETITION NO. 1442 - SR Litchfield, LLC petition for a declaratory ruling, pursuant to Connecticut General Statutes §4-176 and §16-50k, for the proposed construction, maintenance and operation of a 19.8-megawatt AC solar photovoltaic electric generating facility on 6 contiguous parcels located both east and west of Wilson Road south of the intersection with Litchfield Town Farm Road in Litchfield, Connecticut, and both east and west of Rossi Road, south of the intersection with Highland Avenue in Torrington, Connecticut, and associated electrical interconnection**

Decision Conditions 2(d), (e), (h), (i) and (j) and Partial D&M Plan-Phase I Conditions 1 and 2

Dear Attorney Bachman:

SR Litchfield, LLC hereby submits the below information in order to satisfy Conditions 2(d), (e), (h), (i), and (j) of the Connecticut Siting Council's (CSC) September 23, 2021 Decision (Decision) and conditions 1 and 2 of the Council's January 18, 2022 Partial Development and Maintenance Plan-Phase I Decision (D&M Phase I Decision) in the above-referenced petition:

Decision

- **Condition No. 2(d)**

A final DEEP NDDDB determination letter prior to commencement of construction;

Melanie Bachman

May 3, 2023

Page 2

A copy of the final DEEP NDDDB determination letter is provided as **Attachment A**.

- **Condition No. 2(e)**

A final Landscaping Plan;

A final Landscaping Plan is included as **Attachment B**.

- **Condition No. 2(i)**

A livestock co-use plan for the site, including, but not limited to, provisions for rotational grazing, water access and emergency evacuation;

SRL does not have plans to bring sheep to the Project at this time. However, SRL is interested in continuing to explore having sheep grazing at the Project after operation begins. SRL will not bring sheep to the Project until it has notified the Council and received the Council's approval of its sheep grazing plan.

- **Condition No. 2(j)**

Consult with the state and local fire marshals regarding compliance with the CT State Fire Prevention Code, Section 11.12.3 - Ground Mounted Photovoltaic System Installations prior to commencement of construction

SRL consulted with both state and local fire marshals. The state fire marshal directed SRL to the local fire marshals. E-mails from the Litchfield and Torrington fire marshals confirm compliance with the CT State Fire Prevention Code are attached as **Attachment C** and **Attachment D**, respectively.

Partial D&M Plan-Phase I Decision

- **Condition No. 1**

A Spill Prevention and Response Plan

An updated Spill Prevention and Response Plan, which includes contact information for the SRL Field Operations personnel is provided as **Attachment E**.

Melanie Bachman
May 3, 2023
Page 3

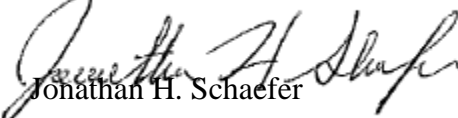
- **Condition No. 2**

Provide procedures for Fuel/Hazardous Materials Storage and Equipment Refueling during construction

A Fuel Storage Spill Prevention Plan is attached as **Attachment F**.

If you have any questions concerning this submittal, please contact me at your convenience.

Sincerely,


Jonathan H. Schaefer

Enclosures (One original and fifteen copies of Attachments A through F)

Copy to: Ali Weaver, SRL (ali.weaver@siliconranch.com)
Robert Goodgame, SRL (robert.goodgame@siliconranch.com)
Ken Baldwin, R+C (kbaldwin@rc.com)
Dominick J. Thomas, Esq. (djt@cohen-thomas.com)



Connecticut Department of
**ENERGY &
ENVIRONMENTAL
PROTECTION**

April 28, 2022

Mr. Dean Gustafson
All-Points Technology Corporation, P.C.
567 Vauxhall Street Ext., Suite 311
Waterford, CT 06385-4341
dgustafson@allpointstech.com

Project: Silicon Ranch 19.8 MW (AC) Solar Facility on Rossi and Wilson Roads and Highland Avenue in Litchfield and Torrington, Connecticut
NDDDB Determination No.: 202100072
Expiration Date: April 28, 2024

Dear Dean Gustafson,

I have re-reviewed Natural Diversity Data Base maps and files regarding the area delineated on the map provided for Silicon Ranch 19.8 MW (AC) solar facility on Rossi and Wilson Roads and Highland Avenue in Litchfield and Torrington, Connecticut. As you are aware, according to our records there are known extant populations of State Listed Species known that occur within or close to the boundaries of this property. These species included:

State Special Concern Plants:

Platanthera flava var. herbiola (Pale green orchid)

State Special Concern Animals:

Lasiurus borealis (Red bat)

Lasiurus cinereus (Hoary bat)

Glyptemys insculpta (Wood turtle)

Dolichonyx oryzivorus (bobolink)

Passerculus sandwichensis (savannah sparrow)

Falco sparverius (American kestrel)

We received a field Investigation and report [SR Litchfield, LLC – Litchfield Solar Project Wilson Road, Litchfield and Rossi Road, Torrington](#) prepared by All-Point Technology and dated November 9, 2021. I concur with the findings in the report and protective protocols that will be implemented to protect state listed species that occur in the area. The Resource Protection Measures that are required is attached and summarized below.

The required protective protocols include:

***Platanthera flava var. herbiola* (Pale green orchid)**

No observations of pale green orchid were found on the project site. I do not anticipate any adverse impacts to this species, even though no occurrences had been found on site because all wetlands with protected with at least a 25-foot no disturbance vegetative buffer.

***Lasiurus borealis* (Red bat)**

***Lasiurus cinereus* (Hoary bat)**

State Special Concern Red and Hoary bats are found in Connecticut during the spring and summer seasons. Their diet primarily consists of moths and beetles. These bats will roost high in large coniferous and deciduous trees. They typically do not roost on buildings. Female tree-roosting bats are solitary and give birth mid-May to late June. If work occurs outside this time frame, direct negative impacts to this species will be minimized. Long-term impacts can be minimized by retaining large diameter coniferous and deciduous trees whenever possible. Establishing this sort of wooded buffer adjacent to the wetland area, will help maintain potential roosting habitat.

Bat Protection Recommendations:

Given the known concentrated seasonal use of this area by bats, we recommend that tree cutting, and other land-clearing activities, be conducted during the hibernation period of these animals. Tree cutting should be conducted from August 31 through March 30 to ensure that bats are safely situated in their hibernacula. Retaining larger diameter trees (12-inch DBH and larger) wherever possible on-site, may additionally minimize the potential for negative impacts to bats. Trees with loose, rough bark such as maples, hickories, and oaks are more desirable than other tree species due to the increased cover that the loose bark provides. Large trees with cavities are also utilized by different bat species.

***Glyptemys insculpta* (Wood turtle)**

Habitat destruction, degradation or alteration and fragmentation all threaten Wood Turtle populations. Turtles are also particularly vulnerable to any activity that consistently reduces adult survivorship. Disturbances to stream and riparian habitats and activities that change the hydrology of the stream, the physical habitat itself and water quality are all potentially detrimental activities for the Wood Turtle. Although Wood Turtles are found within forested areas, they prefer areas that do not have a fully closed canopy cover. The greatest concern during projects occurring in wood turtle habitat are turtles being run over and crushed by mechanized equipment. Reducing the frequency that motorized vehicles enter wood turtle habitat would be beneficial in minimizing direct mortality of adults.

Pre-Construction Protection

The following protection strategies are required in order to protect these turtles:

- Hiring a qualified herpetologist to be on site to ensure these protection guidelines remain in effect and to prevent turtles from being run over when moving heavy equipment. This is especially important in the month of June when turtles are selecting nesting sites.
- Exclusionary practices will be required to prevent any turtle access into construction areas. These measures will need to be installed at the limits of disturbance.
- Exclusionary fencing must be at least 20 in tall and must 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 animal pass through. Do not use plastic or netted silt-fence.
- All staging and storage areas, outside of previously paved locations, regardless of the duration of time they will be utilized, must be reviewed to remove individuals and exclude them from re-entry.
- All construction personnel working within the turtle habitat must be apprised 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 shall be carefully moved to an adjacent area outside of the excluded area and fencing should be inspected to identify and remove access point.

- In areas where silt fence is used for exclusion, it shall be removed as soon as the area is stable to allow for reptile and amphibian passage to resume.
- No heavy machinery or vehicles may be parked in any turtle habitat.
- Special precautions must be taken to avoid degradation of wetland habitats including any wet meadows and seasonal pools.
- The Contractor and consulting herpetologist must search the work area each morning prior to any work being done.
- When felling trees adjacent to brooks and streams please cut them to fall away from the waterway and do not drag trees across the waterway or remove stumps from banks.
- Avoid and limit any equipment use within 100 feet of streams and brooks.
- Any confirmed sightings of box, wood or spotted turtles should be reported and documented with the NDDDB (nddbrequestdep@ct.gov) on the appropriate special animal form found at (http://www.ct.gov/deep/cwp/view.asp?a=2702&q=323460&depNav_GID=1641)

Post-Construction Protection

Mowing maintenance of the property:

- Leave a buffer at edge of fields that are only maintained in winter.
- Where feasible, mow or clear existing fields, if necessary, during the cold months.
 - Best times to mow: Nov 15th - March 15th. This is when turtles are most likely to be estivating.
 - Worst time to mow: May 15th -August 30th. This is when turtles are most likely to be away from the forest and get killed under your vehicle.

If mowing must be conducted during active season (May 15th to August 30th):

- *Mowing style*: Avoid flail mower heads with guide bars that ride along the ground. Sickle bar mowers will have the least impact if mowing every 1-5 years. In areas with more woody vegetation >1-2" diameter Brontosaurus-style mower will likely have the least impact on turtles.
- *Mowing height*: If mowing during active season, retention of mowing stubble to 7-12 inches will reduce mortality, reduce blade wear, and will leave important cover for animals.
- *Directionality* - If mowing during the active season is necessary, start mowing from the center of the field and use a back-and-forth approach, or large circular pattern, to avoid concentrating fleeing animals where they may be killed or stranded. In addition, leave an un-mowed 30 ft strip around the perimeter of the field and mow this area last. Most turtles are found in these areas and this provides time for them to react to the mowing activity and move out of the area.
- *Mower Speed* – Mowing in low gear or at slow speeds will allow turtles to react and move out of the field.
- *Un-mowed Edge* - Leaving an un-mowed field edge in high turtle use areas until after September 15th. Eastern box turtles are usually along field edges adjacent to forest and wood turtles are often in field edges closest to nearby streams.

***Dolichonyx oryzivorus* (bobolink)**

***Passerculus sandwichensis* (savannah sparrow)**

***Falco sparverius* (American kestrel)**

In Connecticut, grasslands are among the most threatened and rare habitats. There are seven species of breeding grassland birds and that require grasslands as their primary habitat that are state listed in Connecticut. Most of Connecticut's grasslands would revert to forest without active management.

Increasing development pressures on Connecticut's most important grassland habitats, exacerbates this loss of habitat through natural succession. The Savannah sparrow is most sensitive to disturbance between

April 1- August 30. The Bobolink is most sensitive to disturbance between May 1- August 30. Traffic and construction in suitable habitat should be avoided during this timeframe.

The continuing decline of suitable grassland habitats is a major threat to our state listed grassland bird species. The decline is exacerbated by the intense development pressure on grassland habitat due to its accessibility.

Many grassland species require expansive tracts of grassland mosaics that may include mowed areas, meadows of tall grasses and wildflowers that function best if kept in 30-acre parcels. Work closely with a biologist to plan your development to have the least impact on state listed grassland bird species.

Site Design Protection Measures:

This solar facility will be built in a field that supports multiple state listed bird species. If planned properly, you can minimize the impacts of habitat loss from your development.

Create a site management plan to promote native vegetation growth in the area under the solar panels. Restoring native vegetation that will attract pollinators and avoid the need for constant mowing will benefit state listed species at this site.

Site management protection measures:

Create a mowing plan for the property that will benefit the state listed birds.

Early successional habitat is important for these species and maintenance by mowing is essential.

Unfortunately, mowing is major source of human induced nest failure.

- **Avoid mowing or vehicular traffic during peak use by these species (April 15- August 15)**

Use these additional techniques to minimize impact, especially if you need to mow during peak use times:

Mower Speed – Mowing in low gear or at slow speeds will allow animals to react and move out of the field.

Unmowed Edge - Leave an unmowed field edge until after September 15th. Other sensitive wildlife are usually along field edges adjacent to forest and closest to nearby streams.

Mow on multiyear rotation (every 2- 3 years) in fields not used for high quality hay production, combine with chemical control of woody plants. In intensively managed agricultural fields where mowing occurs during the bird-nesting season, strips and edges should be left unmowed to provide areas of food and cover.

For grasslands >10acres, limit total mowing to 50% each year. If mowing during active season, limit to 25% of area. If mowing during inactive season limit to 50% of area.

Mowing style: Avoid flail mower heads with guide bars that ride along the ground. Sickle bar mowers will have the least impact if mowing every 1-5 years.

Mowing height: If mowing during active season, retention of mowing stubble to 7-12 inches will reduce mortality, reduce blade wear, and will leave important cover for animals.

Directionality - If mowing during the active season is necessary, start mowing from the center of the field and use a back-and-forth approach, or large circular pattern, to avoid concentrating fleeing animals where they may be killed or stranded. In addition, leave an unmowed 30 ft strip around the perimeter of the field and mow this area last.

Additionally,

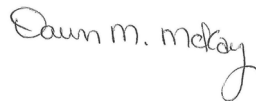
- If field is near stream: start mowing the side furthest from stream and work towards stream.
- If field is bordered by woodland: start mowing side furthest from woodland and work towards woodland.
- If field is bordered by road, start mowing next to the road and work your way across field.

This letter is valid for two years and will expire April 28, 2024.

Natural Diversity Data Base information includes all information regarding critical biological resources available to us at the time of the request. This information is a compilation of data collected over the years by the Department of Energy and Environmental Protection's Natural History Survey and cooperating units of DEEP, private conservation groups and the scientific community. This information is not necessarily the result of comprehensive or site-specific field investigations. Consultations with the Data Base should not be substitutes for on-site surveys required for environmental assessments. Current research projects and new contributors continue to identify additional populations of species and locations of habitats of concern, as well as, enhance existing data. Such new information is incorporated into the Data Base as it becomes available. The result of this review does not preclude the possibility that listed species may be encountered on site and that additional action may be necessary to remain in compliance with certain state permits.

Please contact me if you have further questions at (860) 424-3592, or dawn.mckay@ct.gov . Thank you for consulting the Natural Diversity Data Base.

Sincerely,

A handwritten signature in cursive script that reads "Dawn M. McKay".

Dawn M. McKay
Environmental Analyst 3

Attachment 6

Resources Protection Measures Plan

ENVIRONMENTAL NOTES - RESOURCES PROTECTION MEASURES

WETLAND, VERNAL POOL, AND RARE SPECIES PROTECTION PROGRAM

The proposed solar facility is located proximate to sensitive habitats including wetland resource areas, vernal pools, and rare species. As a result, the following protective measures shall be followed to help avoid degradation of nearby wetland/watercourses, avoid incidental impact to vernal pool indicator species, and rare species.

In addition, Wood Turtle (*Glyptemys insculpta*), Bobolink (*Dolichonyx oryzivorus*), Savannah Sparrow (*Passerculus sandwichensis*), American Kestrel (*Falco sparverius*), Red Bat (*Lasiurus borealis*), and Hoary Bat (*Lasiurus cinereus*), all State Special Concern species afforded protection under the Connecticut Endangered Species Act, are known to occur on or proximity to the proposed facility. These rare species protection measures are similar to protection measures previously approved by the Connecticut Department of Energy and Environmental Protection ("DEEP") Wildlife Division on other similar projects. Details of protection measures to be implemented in association with construction and maintenance of the facility are provided below.

It is of the utmost importance that the Contractor complies with the requirement for implementation of these protective measures and the education of its employees and subcontractors performing work on the project site. The wetland protection measures shall be implemented and maintained throughout the duration of construction activities until permanent stabilization of site soils has occurred. Vernal pool protection measures should be implemented during peak amphibian movement periods (early spring breeding [March 1st to May 15th] and late summer dispersal [July 15th to September 15th]) if construction cannot be avoided during these periods. The rare species protection measures within this plan shall be implemented in accordance with the plan details below for individual species.

All-Points Technology Corporation, P.C. ("APT") will serve as the Environmental Monitor for this project to ensure that these protection measures are implemented properly. APT will provide an education session for the Contractor prior to the start of construction activities on nearby sensitive wetland resources/vernal pools resources and rare species that may be encountered. The Contractor shall contact Dean Gustafson, Senior Biologist at APT, at least 5 business days prior to the start of any construction activities to schedule a pre-construction meeting. Mr. Gustafson can be reached by phone at (860) 552-2033 or via email at dgustafson@allpointstech.com.

This protection program consists of several components: education of all contractors and subcontractors prior to initiation of work on the site; protective measures; periodic inspection of the construction project; and, reporting.

1. Contractor Education

- a. Prior to work on site, the Contractor shall attend an educational session at the pre-construction meeting with APT. This orientation and educational session will consist of an introductory meeting with APT to emphasize the environmentally sensitive nature of the project, the various wetland, vernal pool and rare species resources, and the requirement to diligently follow the Protective Measures as described in sections below. Workers will also be provided information regarding the identification of other turtles, snakes, common herpetofauna, and rare grassland bird species that could be encountered. The meeting will further emphasize the non-aggressive nature of these species, the absence of need to destroy such animals and the need to follow Protective Measures as described in following sections. The Contractor will designate one of its workers as the "Project Monitor", who will receive more intense training on the identification and protection of herpetofauna.
- b. The importance of protecting nearby wetland and vernal pool resources will also be stressed as part of this educational session.

- c. The education session will also focus on means to discriminate between the species of concern and other native species to avoid unnecessary “false alarms”. Encounters with any species of turtles, snakes and amphibians will be documented.
- d. The Contractor will designate a member of its crew as the Project Monitor to be responsible for the periodic “sweeps” for herpetofauna within the construction zone each morning and for any ground disturbance work. This individual will receive more intense training from APT on the identification and protection of herpetofauna in order to perform sweeps. Any herpetofauna discovered would be translocated outside the work zone in the general direction the animal was oriented.
- e. The Contractor will be provided with cell phone and email contacts for APT personnel to immediately report any encounters with any rare species. Educational poster materials will be provided by APT and displayed on the job site to maintain worker awareness as the project progresses.
- f. APT will also post Caution Signs throughout the project site for the duration of the construction project providing notice of the environmentally sensitive nature of the work area, the potential for encountering various amphibians and reptiles and precautions to be taken to avoid injury to or mortality of these animals.
- g. If any rare species are encountered, the Contractor shall immediately cease all work, avoid any disturbance to the species, and contact APT.

2. Isolation Measures & Sedimentation and Erosion Controls

- a. Plastic netting used in a variety of erosion control products (i.e., erosion control blankets, fiber rolls [wattles], reinforced silt fence) has been found to entangle wildlife, including reptiles, amphibians, birds, and small mammals, but particularly snakes. No permanent erosion control products or reinforced silt fence will be used on the project. Temporary erosion control products will use either erosion control blankets and fiber rolls composed of processed fibers mechanically bound together to form a continuous matrix (netless) or netting composed of planar woven natural biodegradable fiber to avoid/minimize wildlife entanglement.
- b. Installation of sedimentation and erosion controls, required for erosion control compliance and creation of a barrier to possible migrating/dispersing turtles, shall be performed by the Contractor following clearing activities and prior to any earthwork. The Environmental Monitor will inspect the work zone area prior to and following erosion control barrier installation to ensure the area is free of Wood Turtle (along with other amphibians and reptiles that may be encountered) and document barriers have been satisfactorily installed. The intent of the barrier is to segregate the majority of the work zone and isolate it from nesting/foraging/migrating/dispersing turtles, snakes and other herpetofauna. Oftentimes complete isolation of a work zone is not feasible due to accessibility needs and locations of staging/material storage areas, etc. Although the barriers may not completely isolate the work zone, they will be positioned to deflect migrating/dispersal routes away from the work zone to minimize potential encounters with turtles, snakes and other herpetofauna.
- c. Exclusionary fencing shall be at least 20 inches tall and must be secured to and remain in contact with the ground and be regularly maintained by the contractor (at least bi-weekly and after major weather events) to secure any gaps or openings at ground level that may let animal pass through.
- d. The Contractor is responsible for daily inspections of the sedimentation and erosion controls for tears or breeches and accumulation levels of sediment, particularly following storm events that generate a discharge. as defined by and in accordance

with applicable local, state and federal regulations. The Contractor shall notify the Environmental Monitor within 24 hours of any breeches of the sedimentation and erosion controls and any sediment releases beyond the perimeter controls that impact wetlands, watercourses or within 100 feet of wetlands and watercourses. The Environmental Monitor will provide periodic inspections of the sedimentation and erosion controls throughout the duration of construction activities only as it pertains to their function as isolation measures for the protection of rare species. Such inspections will generally occur once per month. The frequency of monitoring may increase depending upon site conditions, level of construction activities in proximity to sensitive receptors, or at the request of the permittee. If the Compliance Monitor is notified by the Contractor of a sediment release, an inspection will be scheduled specifically to investigate and evaluate possible impacts to wetland and/or watercourse resources.

- e. Third party monitoring of sedimentation and erosion controls will be performed by other parties, as necessary, under applicable local, state and/or federal regulations and permit conditions.
- f. The extent of the sedimentation and erosion controls will be as shown on the site plans. The Contractor shall have additional sedimentation and erosion controls stockpiled on site should field or construction conditions warrant extending the controls as directed by APT or other regulatory agencies.
- g. No equipment, vehicles or construction materials shall be stored outside of the sedimentation and erosion controls within 100 feet of wetlands or watercourses.
- h. All sedimentation and erosion controls shall be removed within 30 days of completion of work and permanent stabilization of site soils so that reptile and amphibian movement between uplands and wetlands is not restricted.

3. Petroleum Materials Storage and Spill Prevention

- a. Certain precautions are necessary to store petroleum materials, refuel and contain and properly clean up any inadvertent fuel or petroleum (i.e., oil, hydraulic fluid, etc.) spill to avoid possible impact to nearby resources.
- b. Silicon Ranch Corporation has developed and will adhere to a Spill Prevention Control and Countermeasure (SPCC) Plan for this project as per the requirements of 40 CFR 112. Please refer to the SPCC for specific requirements. Basic requirements for petroleum materials storage and spill prevention are provided below. In the event these basic requirements contradict the SPCC, the Contractor shall rely on requirements provided in the SPCC.
- c. A spill containment kit consisting of a sufficient supply of absorbent pads and absorbent material will be maintained by the Contractor at the construction site throughout the duration of the project. In addition, a waste drum will be kept on site to contain any used absorbent pads/material for proper and timely disposal off site in accordance with applicable local, state, and federal laws.
- d. The following petroleum and hazardous materials storage and refueling restrictions and spill response procedures will be adhered to by the Contractor.
 - i. Petroleum and Hazardous Materials Storage and Refueling
 1. Refueling of vehicles or machinery shall occur a minimum of 100 feet from wetlands or watercourses and shall take place on an impervious pad with secondary containment designed to contain fuels.

2. Any fuel or hazardous materials that must be kept on site shall be stored on an impervious surface utilizing secondary containment a minimum of 100 feet from wetlands or watercourses.
3. The contractor shall inspect all equipment at the beginning and end of each day for any fuel or hydraulic leaks and if discovered shall take immediate steps to make repairs and clean up any discharges as detailed in the following sections.

ii. Initial Spill Response Procedures

1. Stop operations and shut off equipment.
2. Remove any sources of spark or flame.
3. Contain the source of the spill.
4. Determine the approximate volume of the spill.
5. Identify the location of natural flow paths to prevent the release of the spill to sensitive nearby waterways or wetlands.
6. Ensure that fellow workers are notified of the spill.

iii. Spill Clean Up & Containment

1. Obtain spill response materials from the on-site spill response kit. Place absorbent materials directly on the release area.
2. Limit the spread of the spill by placing absorbent materials around the perimeter of the spill.
3. Isolate and eliminate the spill source.
4. Contact the appropriate local, state and/or federal agencies, as necessary.
5. Contact a disposal company to properly dispose of contaminated materials in accordance with all local, state, and federal regulations.

iv. Reporting

1. Complete an incident report.
2. Submit a completed incident report to the Connecticut Siting Council, and other applicable local, state, and federal officials.

4. Herbicide, Pesticide and Salt Restrictions

- a. The use of herbicides and pesticides at the facility shall be restricted. In the event herbicides and/or pesticides are required at the facility (i.e., to assist in management of invasive species within habitat enhancement areas), their use will be used in accordance with Integrated Pest Management ("IPM") principles with particular attention to minimize applications within 100 feet of wetland or watercourse resources. No applications of herbicides or pesticides are allowed within actual wetland or watercourse resources.
- b. Maintenance of the facility during the winter months shall not include the application of salt or similar products for melting snow or ice.

5. Vernal Pool Protection Measures

- a. A thorough cover search of the construction area will be performed by APT's Environmental Monitor for herpetofauna (amphibians and reptiles) prior to and following installation of the silt fencing barrier to remove any species from the work zone prior to the initiation of construction activities. Any herpetofauna discovered would be carefully translocated outside the work zone in the general direction the animal was oriented. Periodic inspections will be performed by APT's Environmental Monitor throughout the duration of the construction.
- b. Any stormwater management features, ruts or artificial depressions that could hold water created intentionally or unintentionally by site clearing/construction activities will be properly filled in and permanently stabilized with vegetation to avoid the creation of vernal pool "decoy pools" that could intercept amphibians moving toward the vernal pools. Stormwater management features such as level spreaders will be carefully reviewed in the field to ensure that standing water does not endure for more than a 24-hour period to avoid creation of decoy pools and may be subject to field design changes. Any such proposed design changes will be reviewed by the design engineer to ensure stormwater management functions are maintained.

6. Turtle Protection Measures – Construction Phase

- a. Prior to construction and following installation of isolation barriers, the construction area will be swept by APT and any turtles occurring within the work area will be relocated to suitable habitat outside of the isolation barriers.
- b. Prior to the start of construction each day, the contractor shall search the entire work area for turtles.
- c. If a turtle is found during the active period, it shall be immediately moved, unharmed, by being carefully grasped in both hands, one on each side of the shell, between the turtle's forelimbs and the hind limbs, and placed just outside of the isolation barrier in the same approximate direction it was heading. These animals are protected by law and no turtles should be relocated from the property.
- d. Special care shall be taken by the contractor during early morning and evening hours so that possible basking or foraging turtles are not harmed by construction activities.
- e. The contractor shall be particularly diligent during the months of May and June when turtles are actively selecting nesting sites which results in an increase in turtle movement activity.
- f. No heavy machinery or vehicles may be parked in any turtle habitat.
- g. Avoid and limit any equipment use within 100 feet of wetlands and no heavy machinery or vehicles may be parked in any turtle habitat or within 100 feet of wetlands.
- h. Special precautions must be taken to avoid degradation of wetland habitats, particularly along an perennial stream riparian corridors.

7. Turtle Protection Measures – Facility Maintenance (Mowing Recommendations)

- a. Perform mowing during the turtle dormant period – November 1st through March 31st when possible.
- b. If mowing is required outside of the turtle dormant period, avoid mowing during May 15th through August 30th when turtles may be located within the facility (and away

from forested habitat), if possible, understanding that some vegetation maintenance is necessary for operational and electrical safety purposes.

- c. Vegetation maintenance within the fenced solar facility may be accomplished through sheep grazing. Should that technique be used, mowing restrictions would not apply; mowing recommendations outside of the fenced facility would still apply.
- d. If mowing is required during the turtle active season (April 1st through October 31st), mowing should be performed as follows.
 - i. Mowing style: Avoid flail mower heads with guide bars that ride along the ground. Sickle bar mowers will have the least impact if mowing every 1-5 years. In areas with more woody vegetation >1-2" diameter Brontosaurus-style mower will likely have the least impact on turtles.
 - ii. Mowing height: If mowing during active season, retention of mowing stubble to 7-12 inches will reduce mortality, reduce blade wear, and will leave important cover for animals.
 - iii. Directionality: If mowing during the active season is necessary, start mowing from the center of the field and use a back-and-forth approach, or large circular pattern, to avoid concentrating fleeing animals where they may be killed or stranded. In addition, leave an un-mowed 30 ft strip around the perimeter of the field and mow this area last. Most turtles are found in these areas and this provides time for them to react to the mowing activity and move out of the area.
 - iv. Mower Speed: Mowing in low gear or at slow speeds will allow turtles to react and move out of the field.
 - v. Un-mowed Edge: Leaving an un-mowed field edge in high turtle use areas until after September 15th. Wood turtles are often in field edges closest to nearby streams.

8. Rare Grassland Birds Protection Measures - Construction-Phase

- a. Ideally, construction should be performed outside of the sensitive breeding season (April 1 through August 30).
- b. However, if construction activities are to occur during the active peak breeding season for rare grassland bird species (May 20 to August 20), these birds should be deterred from nesting within the Project limits by implementing the following measures.
- c. The Project area should be mowed continuously twice per week starting on May 1st and continuing until construction begins.
- d. Vegetation should not be allowed to exceed three inches in height during this period.
- e. The twice per week mowing schedule should be maintained regardless of vegetation height (i.e., even if vegetation height remains below three inches), to serve as an additional deterrent to nest establishment.
- f. Field surveys by qualified biologists should occur during this mowing period and through the month of May until construction begins to ensure that the measures are effectively deterring nest establishment. If this proves unsuccessful, remedial measures will be recommended.

- g. For maintenance of the Facility once construction has been completed, mowing activities should be restricted as outlined in Section 9: Rare Grassland Birds Site Management Protection Measures (Mowing).

9. Rare Grassland Birds Site Management Protection Measures – Maintenance Mowing

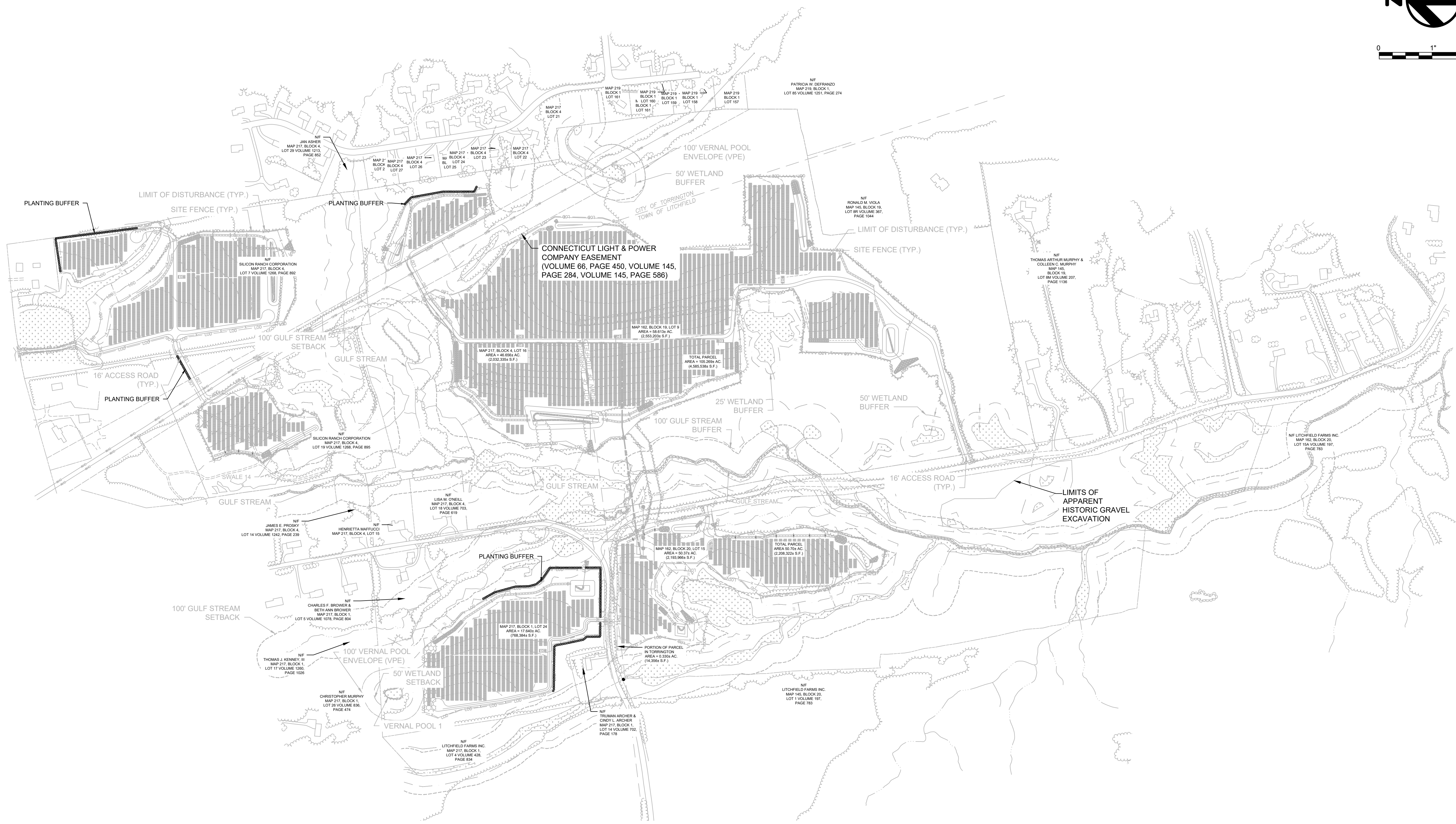
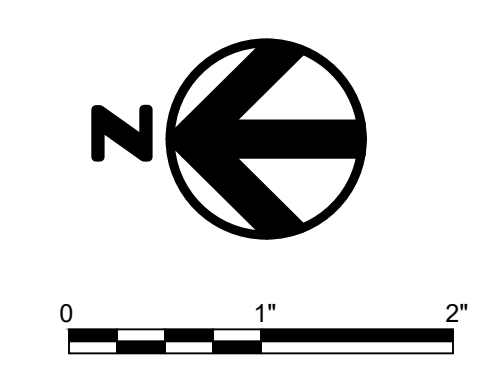
- a. The following measures are intended for implementation within the fenced solar-powered generation facility for maintenance mowing once the facility is operational. The likelihood of nesting occurring within the fenced compound, and amongst the arrays themselves, is low. However, these birds may breed in the contiguous grassland habitat adjacent to the facility and therefore would be subject to secondary impacts such as noise or visual disturbance that may affect nesting. Additionally, there is the potential for adults and fledglings to feed within the fenced compound.
- b. Vegetation maintenance within the fenced solar facility may be accomplished through sheep grazing. Should that technique be used, mowing restrictions would not apply.
- c. Timing of Mowing/Vegetation Maintenance: If possible, mowing should be avoided from May 20th through August 20th to minimize impacts to nesting birds. For the benefit of birds as well as terrestrial wildlife, mowing conducted once per season is optimal, after October 15th when most species have entered fall/winter dormancy.
- d. Mowing Type/Method:
 - 1. Mower Speed: Mowing at slow speeds will allow animals to react and move out of the field.
 - 2. Mowing style: Avoid flail mower heads with guide bars that ride along the ground. Sickle bar mowers will have the least impact if mowing every 1-5 years.
 - 3. Mowing height: If mowing during the breeding season, retention of mowing stubble at a minimum height of 7 inches will reduce mortality and will leave important cover for wildlife.
 - 4. Directionality: If mowing during the breeding season is necessary, start mowing closest to the arrays and move outward toward the edge of the array field.
- e. Pre-Mowing Nest Surveys: If mowing outside of the nesting season is not possible, a pre-mowing inspection by an ornithologist is recommended to confirm that no nests are present within the mowing limits. That survey should occur no more than one week prior to the start of mowing. Any activity by target species should be field flagged and/or conveyed to the contractor. If a nest site is observed within the mowing limits, no mowing should occur within 100 feet of the nest site until it is inactive and the fledglings are fully mobile.

10. Rare Bats Site Management Measures (Tree Clearing)

- a. Tree clearing is restricted to occur only between August 15th through April 30th, during the bat's non-roosting period, when bats would not be present on the Site.

11. Reporting

- a. A Compliance Monitoring Report (brief narrative and applicable photos) documenting each APT inspection will be submitted by APT to the contractor and permittee for compliance verification. Any observations of rare species, vernal pool indicator species, wetland impacts, or corrective actions will be included in the reports.
- b. Following completion of the construction project, APT will provide a Final Compliance Monitoring Report to the permittee documenting implementation of this wetland, vernal pool, and rare species protection program, monitoring and any species observations. The permittee shall provide a copy of the Final Compliance Monitoring Report to the Connecticut Siting Council for compliance verification.
- c. Any observations of rare species will be reported to DEEP by APT on the appropriate special animal reporting form, with photo-documentation (if possible) and specific information on the location and disposition of the animal.



NOT FOR CONSTRUCTION

LITCHFIELD SOLAR

2-298 ROSSI RD
TORRINGTON, CT 06790, USA
LAT: 41.794157°N
LON: 73.168028°W

LITCHFIELD, CT

LEGEND

- UTILITY OVERHEAD LINE
- PROPERTY LINE
- ADJOINING PROPERTY LINE
- EASEMENT
- RIGHT OF WAY
- EXISTING TREE LINE
- WETLANDS
- 25' WETLAND BUFFER
- VERNAL POOL ENVELOPE
- LANDSCAPING

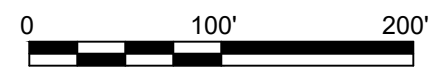
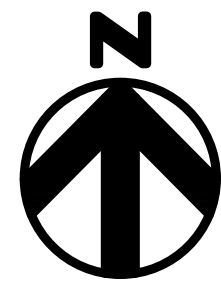
REV. NO	DESCRIPTION	DATE

SHEET TITLE:

OVERALL LANDSCAPE SITE PLAN

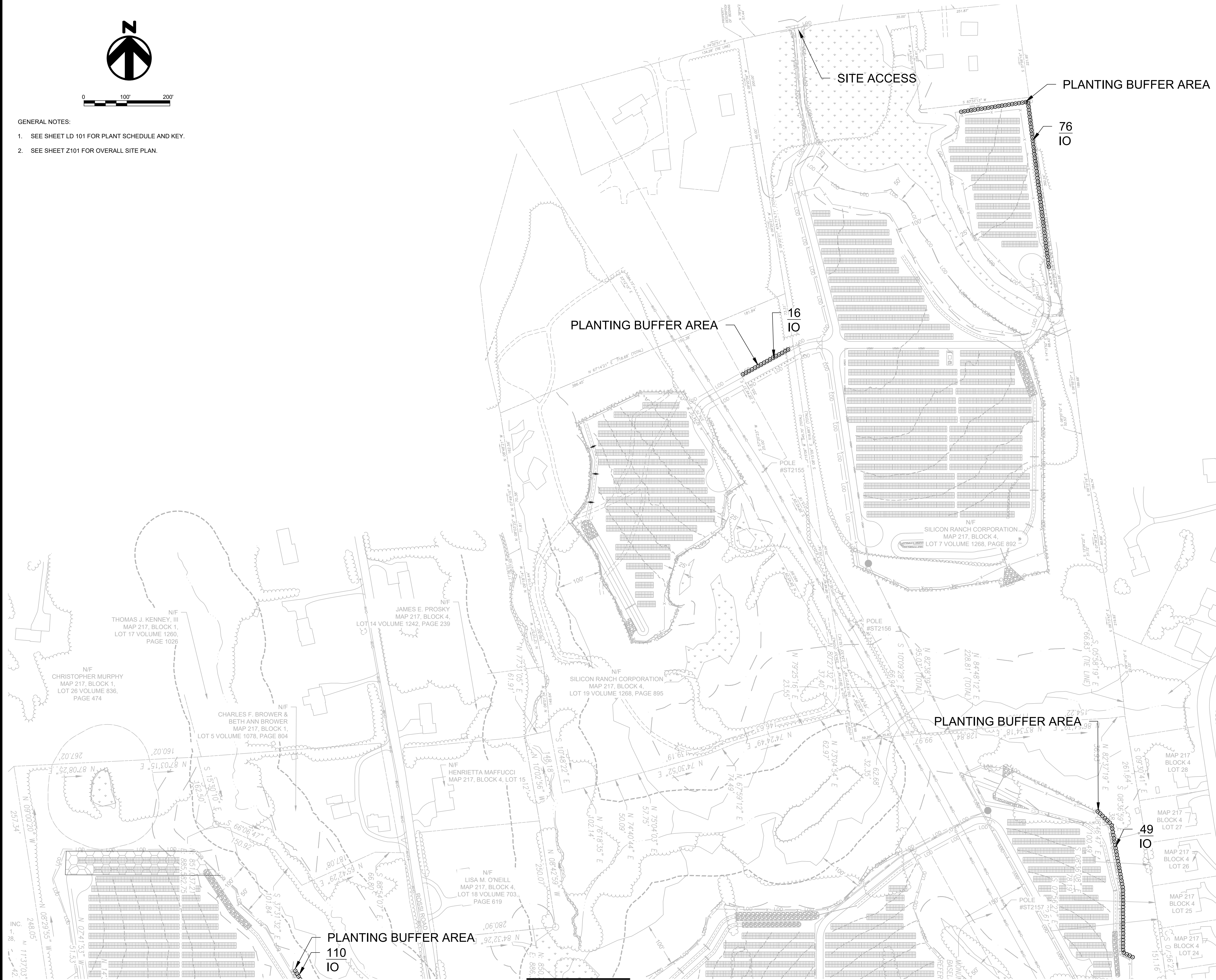
PROJ. MGR. CM	PROJ. ENGR. MB	DATE: 04/17/23
DRAWN BY: JP	CHECKED BY: CP	SCALE: 1"=250'
DRAWING NO.		

L100



GENERAL NOTES:

- 1. SEE SHEET LD 101 FOR PLANT SCHEDULE AND KEY.
- 2. SEE SHEET Z101 FOR OVERALL SITE PLAN.



NOT FOR
CONSTRUCTION

LITCHFIELD SOLAR

2-298 ROSSI RD
 TORRINGTON, CT 06790, USA
 LAT: 41.794157°N
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LITCHFIELD, CT

REV. NO	DESCRIPTION	DATE

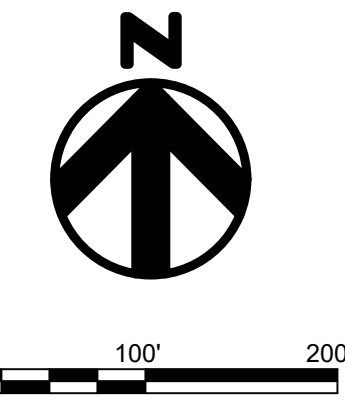
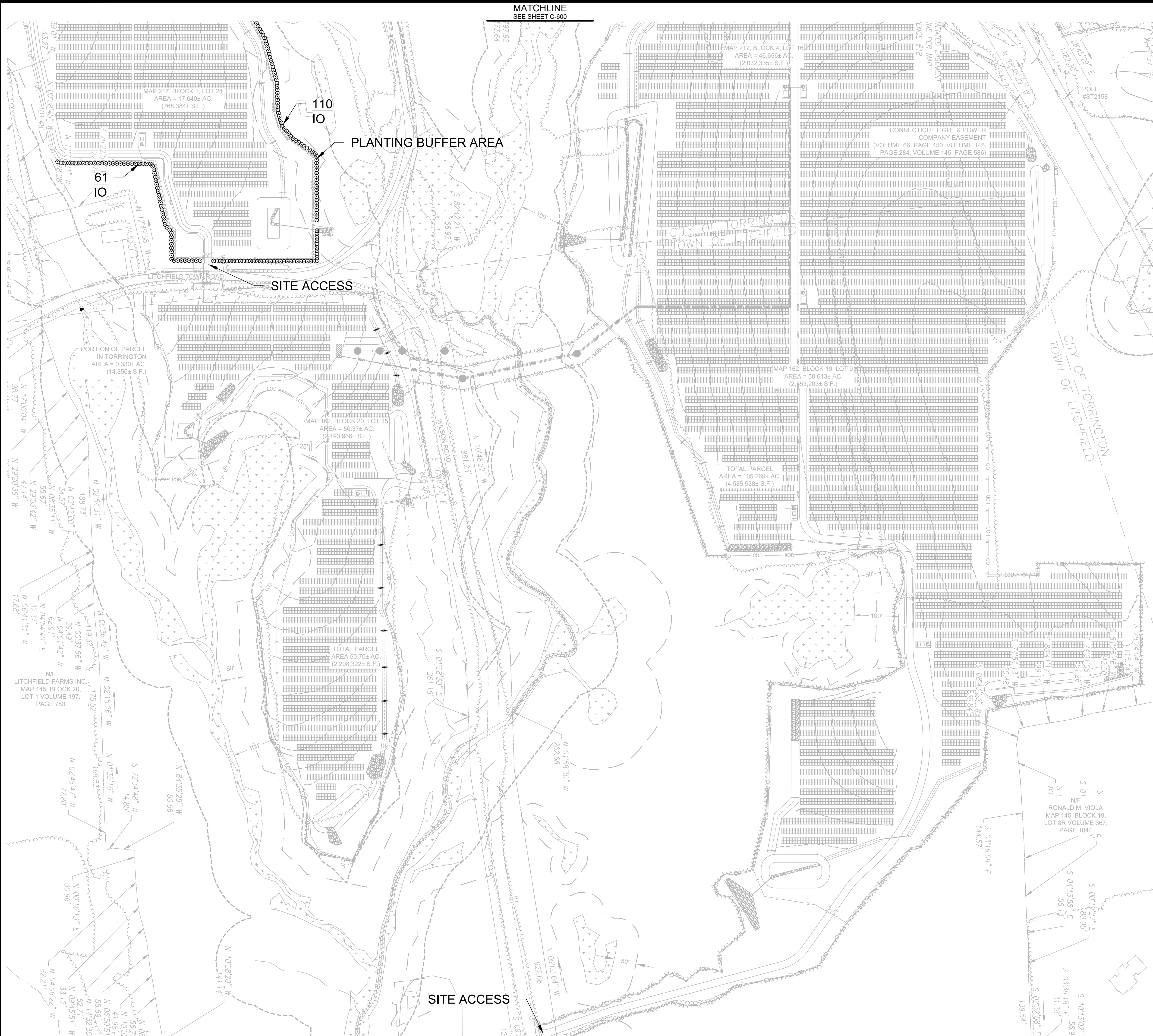
SHEET TITLE:

LANDSCAPE PLAN 1

PROJ. MGR. CM	PROJ. ENGR. MB	DATE: 04/17/23
DRAWN BY: JP	CHECKED BY: CP	SCALE: 1:100
DRAWING NO.		

L101

SEE SHEET C-601
MATCHLINE



- GENERAL NOTES:
- SEE SHEET LD101 FOR PLANT SCHEDULE AND KEY.
 - SEE SHEET Z101 FOR OVERALL SITE PLAN.



NOT FOR CONSTRUCTION

LITCHFIELD SOLAR
 2-298 ROSSI RD
 TORRINGTON, CT 06790, USA
 LAT: 41.794157°N
 LON: 73.168028°W

LITCHFIELD, CT

REV. NO	DESCRIPTION	DATE

SHEET TITLE:

LANDSCAPE PLAN 2

PROJ. MGR. CM	PROJ. ENGR. MB	DATE: 04/17/23
DRAWN BY: JP	CHECKED BY: CP	SCALE: 1:100

DRAWING NO.

L102

LANDSCAPE NOTES

GENERAL:

1. THE LANDSCAPE CONTRACTOR SHALL CAREFULLY CORRELATE CONSTRUCTION ACTIVITIES WITH THAT OF THE EARTHWORK CONTRACTOR AND OTHER SITE DEVELOPMENT.
2. THE CONTRACTOR SHALL VERIFY DRAWING DIMENSIONS WITH ACTUAL FIELD CONDITIONS AND INSPECT RELATED WORK AND ADJACENT SURFACES. THE CONTRACTOR SHALL VERIFY THE ACCURACY OF ALL FINISH GRADES WITHIN THE WORK AREA. THE CONTRACTOR SHALL REPORT TO THE LANDSCAPE ARCHITECT AND OWNER ALL CONDITIONS WHICH PREVENT PROPER EXECUTION OF THIS WORK.
3. THE EXACT LOCATION OF ALL EXISTING UTILITIES, STRUCTURES AND UNDERGROUND UTILITIES, WHICH MAY NOT BE INDICATED ON THE DRAWINGS, SHALL BE DETERMINED BY THE CONTRACTOR. THE CONTRACTOR SHALL PROTECT EXISTING STRUCTURES AND UTILITY SERVICES AND IS RESPONSIBLE FOR THEIR REPLACEMENT IF DAMAGED.
4. THE CONTRACTOR SHALL KEEP THE PREMISES FREE FROM RUBBISH AND ALL DEBRIS AT ALL TIMES AND SHALL ARRANGE MATERIAL STORAGE SO AS NOT TO INTERFERE WITH THE OPERATION OF THE PROJECT. ALL UNUSED MATERIALS, RUBBISH AND DEBRIS SHALL BE REMOVED FROM THE SITE. ALL LANDSCAPED AREAS MULCHED UNLESS OTHERWISE NOTED.
5. ALL VEGETATION SHOWN ON THIS PLAN SHALL BE MAINTAINED IN A HEALTHY AND VIGOROUS GROWING CONDITION THROUGHOUT THE DURATION OF THE PROPOSED USE. ALL VEGETATION NOT SO MAINTAINED SHALL BE REPLACED WITH NEW VEGETATION WITHIN 45 DAYS.
6. ALL DISTURBED AREAS OF THE SITE NOT OCCUPIED BY BUILDINGS OR PAVEMENT AND NOT SPECIFIED AS BEING PLANTED WITH TREES OR SHRUBS SHALL BE SEEDED.
7. NO TREES OR SHRUBS SHALL BE PLANTED ON EXISTING OR PROPOSED UTILITY LINES
8. THE THINNING OF UNDERSTORY TREES AND OTHER VEGETATION WITHIN THE DEVELOPMENT MAY BE APPROVED OR REQUIRED BY THE LANDSCAPE ADMINISTRATOR TO ENCOURAGE THE HEALTHY MATURATION OF PREFERRED TREES.

WARRANTY:

1. ALL PLANT MATERIAL (TREES, SHRUBS, ETC.) AND PLANTING SUPPLIES (BARK MULCH, ETC.) SHALL BE WARRANTED FOR A PERIOD OF NOT LESS THAN TWO YEARS FROM THE DATE OF COMPLETION OF THE LANDSCAPE INSTALLATION. ALL REPLACEMENT STOCK SHALL BE SUBJECT TO THE SAME WARRANTY REQUIREMENTS AS THE ORIGINAL STOCK. ANY DAMAGE DUE TO REPLACEMENT OPERATIONS SHALL BE REPAIRED BY THE LANDSCAPE CONTRACTOR. AT THE END OF THE WARRANTY PERIOD, INSPECTIONS SHALL BE MADE JOINTLY BY LANDSCAPE ARCHITECT, OWNER, TENANT AND LANDSCAPE CONTRACTOR. ALL PLANT AND LAWN AREAS NOT IN A HEALTHY GROWING CONDITION SHALL BE REMOVED AND REPLACED WITH PLANTS AND TURF COVER OF A LIKE KIND AND SIZE BEFORE THE CLOSE OF THE NEXT PLANTING SEASON.

PLANT STOCK:

1. PLANT MATERIAL SHALL BE FIRST QUALITY STOCK AND SHALL CONFORM TO THE CODE OF STANDARDS SET FORTH IN THE CURRENT EDITION OF THE AMERICAN STANDARDS FOR NURSERY STOCK SPONSORED BY THE AMERICAN ASSOCIATION FOR NURSERYMEN, INC. (AAN).
2. SPECIES AND VARIETY AS SPECIFIED ON THE DRAWINGS AND DELIVERED TO THE SITE SHALL BE CERTIFIED TRUE TO THEIR GENUS, SPECIES AND VARIETY AND AS DEFINED WITHIN THE CURRENT EDITION OF INTERNATIONAL CODE OF NOMENCLATURE FOR CULTIVATED PLANTS ISSUED BY THE INTERNATIONAL UNION OF BIOLOGICAL SCIENCES. SUBSTITUTIONS ARE NOT PERMITTED WITHOUT LANDSCAPE ARCHITECT'S WRITTEN APPROVAL.
3. PLANTING STOCK SHALL BE WELL-BRANCHED AND WELL-FORMED, SOUND, VIGOROUS, HEALTHY, FREE FROM DISEASE, SUN-SCALD, WINDBURN, ABRASION, AND HARMFUL INSECTS OR INSECT EGGS; AND SHALL HAVE HEALTHY, NORMAL UNBROKEN ROOT SYSTEMS. DECIDUOUS TREES AND SHRUBS SHALL BE SYMMETRICALLY DEVELOPED, OF UNIFORM HABIT OF GROWTH, WITH STRAIGHT TRUNKS OR STEMS, AND FREE FROM OBJECTIONABLE DISFIGUREMENTS. EVERGREEN TREES AND SHRUBS SHALL HAVE WELL-DEVELOPED SYMMETRICAL TOPS WITH TYPICAL SPREAD OF BRANCHES FOR EACH PARTICULAR SPECIES OR VARIETY. ONLY VINES AND GROUND COVER PLANTS WELL ESTABLISHED SHALL BE USED. PLANTS BUDDING INTO LEAF OR HAVING SOFT GROWTH SHALL BE SPRAYED WITH AN ANTI-DESICCANT AT THE NURSERY BEFORE DIGGING.
4. STOCK SIZES: ALL STOCK MEASUREMENTS - CALIPER, HEIGHT BRANCHING LEVEL, NUMBER OF CANES, BALL SIZES SHALL BE IN STRICT ACCORDANCE WITH THE LATEST EDITION OF THE AMERICAN STANDARD FOR NURSERY STOCK.
5. ALL STOCK SHALL BE BALLED AND BURLAPPED OR CONTAINER GROWN STOCK. [BARE ROOT STOCK OF ANY KIND IS UNACCEPTABLE.]

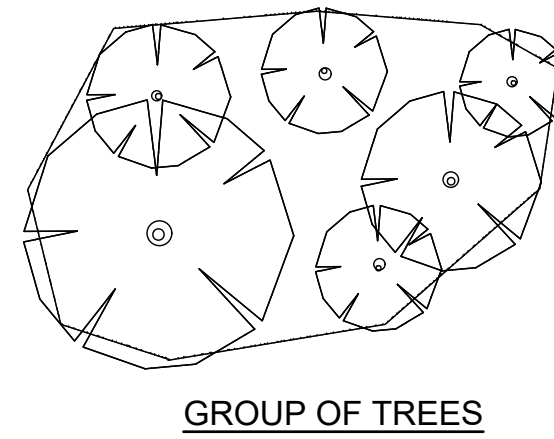
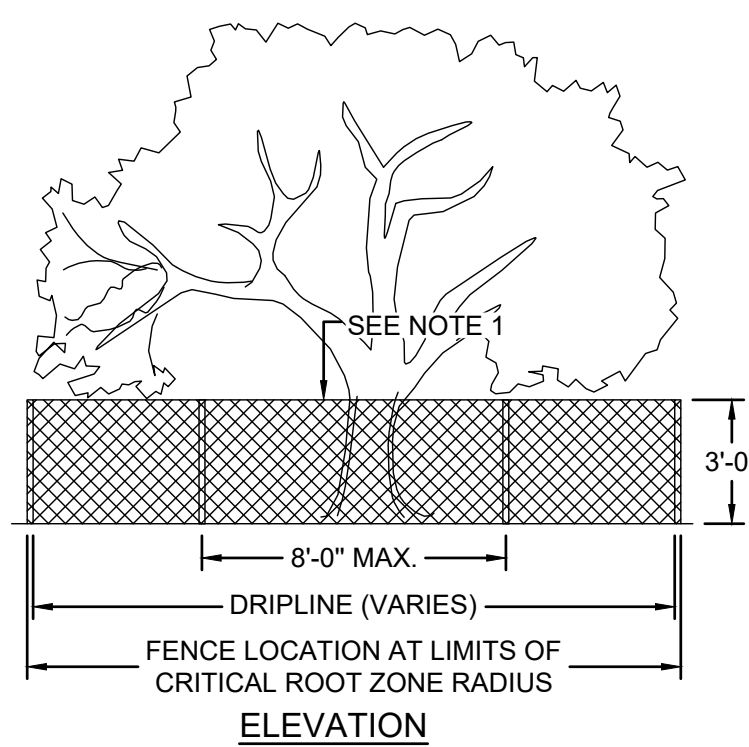
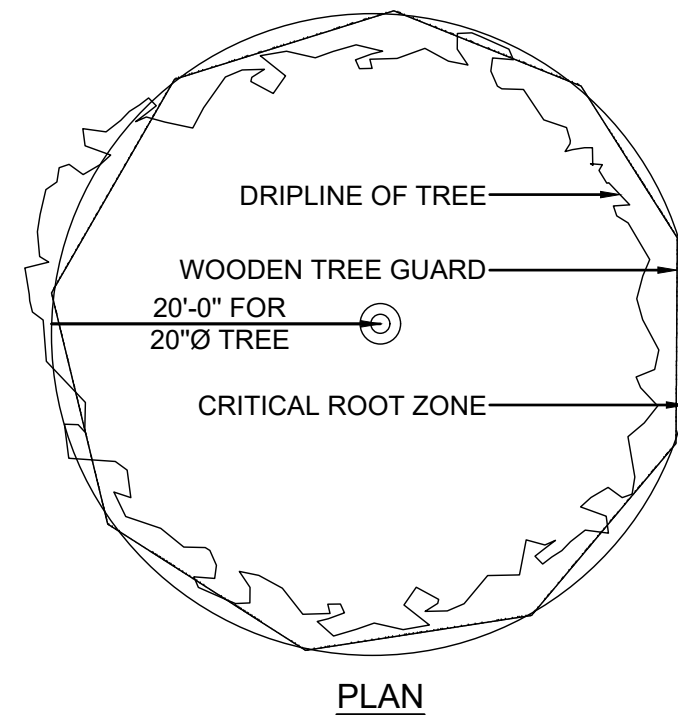
MULCHES FOR PLANTINGS:

1. SHREDDED BARK MULCH, MEDIUM SIZE, FROM HARDWOOD TREES. NO PIECES OVER TWO INCHES (2") IN GREATEST DIMENSION. FREE FROM SAWDUST, STONES, DEBRIS, AND DELETERIOUS MATERIALS.

SEEDING:

1. SEED SHALL BE A BLEND OF CERTIFIED LAWN GRASS AND/OR GROUND COVER PLANT SEEDS COMMON TO THE SITE LOCATION. PROVIDE FRESH, CLEAN, NEW-CROP SEED COMPLYING WITH ESTABLISHED TOLERANCES FOR GERMINATION AND PURITY IN ACCORDANCE WITH THE U.S. DEPARTMENT OF AGRICULTURE RULES AND REGULATIONS UNDER THE LATEST EDITION OF THE FEDERAL SEED ACT. SEED SHALL BE MIXED BY THE DEALER AND SHALL BE DELIVERED TO THE SITE IN SEALED CONTAINERS WHICH SHALL BEAT THE DEALER'S GUARANTEED ANALYSIS.

AMOUNT BY WEIGHT	SPECIES OR VARIETY	PURITY	PERCENTAGE GERMINATION
45%	KENTUCKY BLUEGRASS	95%	80%
25%	CREeping RED FESCUE	97%	85%
20%	PERENNIAL RYE GRASS	98%	90%
10%	ANNUAL RYE GRASS	95%	85%
10%	FAWN TALL FESCUE	95%	85%

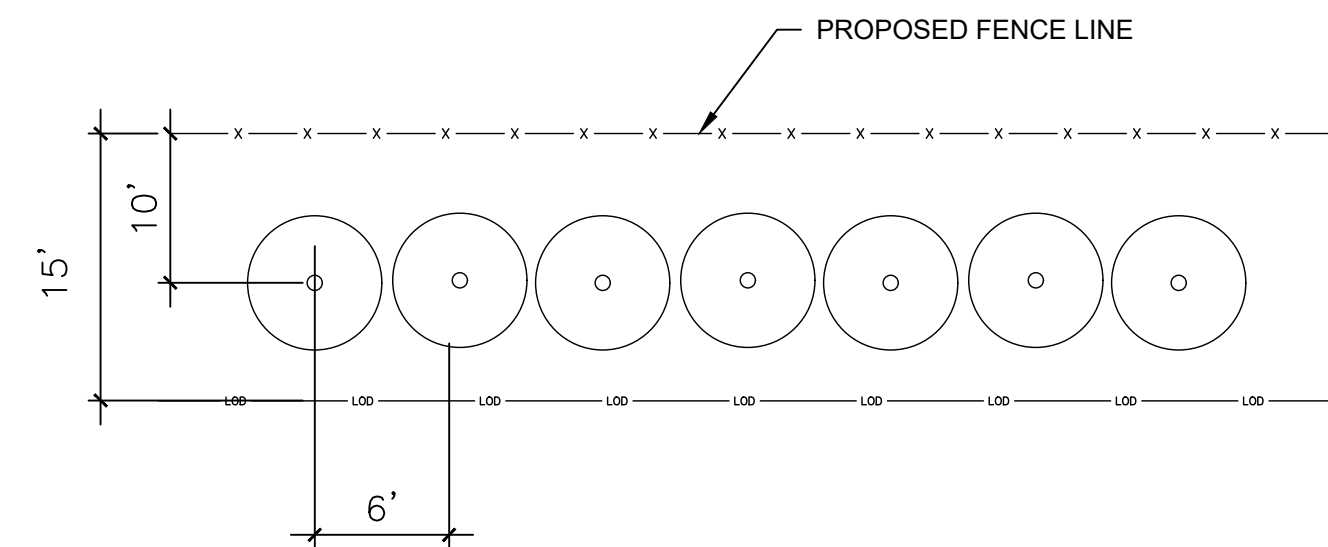


NOTES:

1. HEAVY VINYL GUARD POSTS SHALL BE U-SHAPED, 13 GAUGE, ROOSTPROOFED STEEL, AND OF 3'-0" OF HEIGHT.
2. GUARD POSTS SHALL BE INSTALLED WITH LINE POST/TAKES SECURELY ATTACHED WITH GALVANIZED OR STAINLESS STEEL SCREWS TO THE WOODEN POSTS AND DRIVEN 18" INTO GROUND.
3. CRITICAL ROOT ZONE (C.R.Z.) RADIUS = 1 FT. PER INCH OF TRUNK DIAMETER.

TREE PROTECTION FENCE DETAIL

NOT TO SCALE

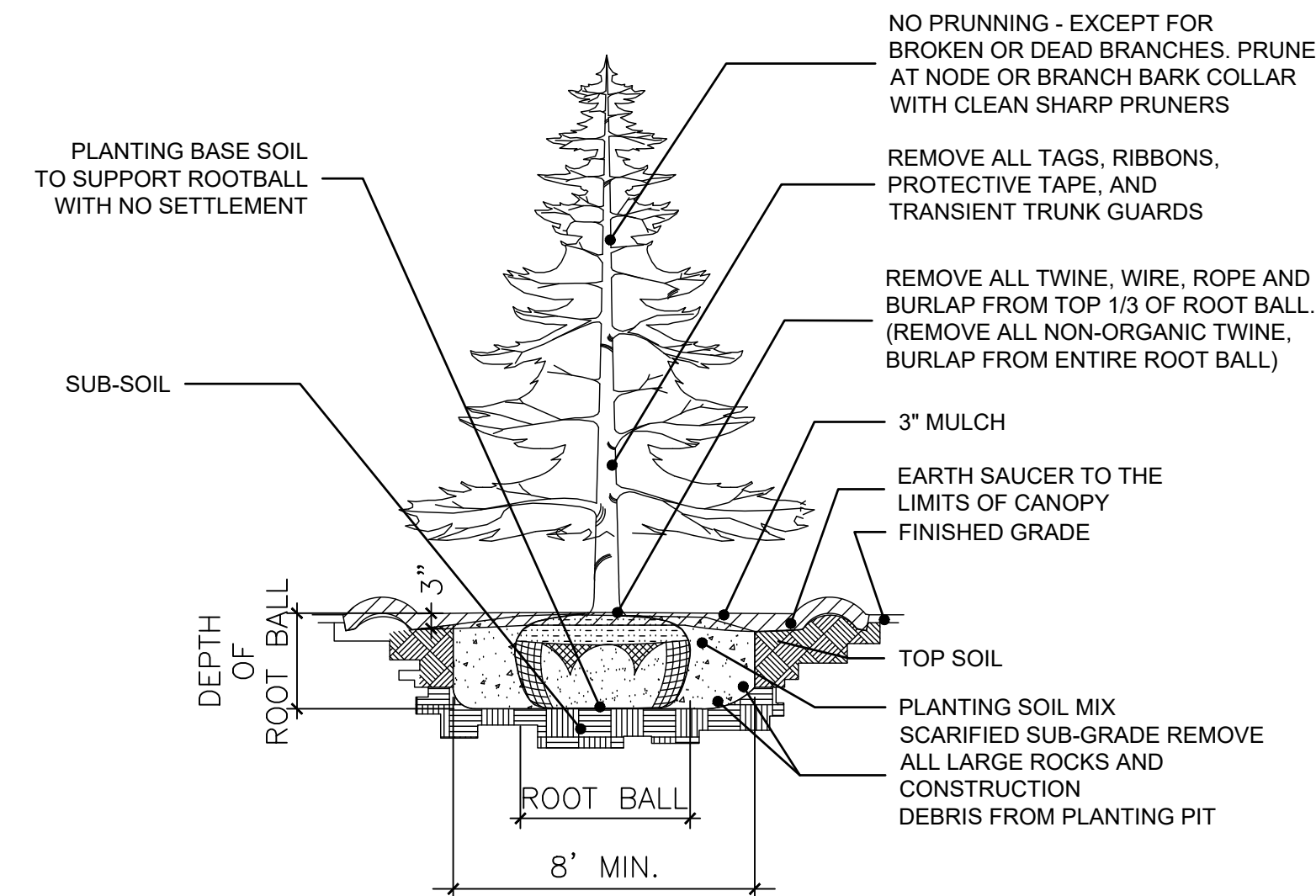


VEGETATIVE BUFFER DETAIL

NOT TO SCALE

PLANT SCHEDULE						
KEY	QTY	BOTANICAL NAME	COMMON NAME	SIZE	ROOT	NOTES
IO	312	ILEX OPACA	AMERICAN HOLLY	15' T	B&B	10' W

SHOULD QUANTITIES VARY, PLAN SHALL DICTATE.

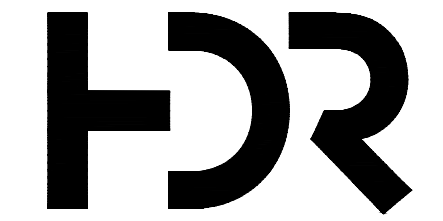


NOTES:

1. NO SOIL OR MULCH SHALL BE PLACED AGAINST ROOT COLLAR OF PLANT.
2. REMOVE ALL ROPE FROM TRUNK & TOP OF ROOT BALL. FOLD BURLAP BACK BELOW GRADE.
3. STAKING IS NOT REQUIRED UNLESS PROPER VERTICAL ALIGNMENT OF PLANT CANNOT BE MAINTAIN DUE TO WINDY CONDITIONS.
4. MULCH SHALL EXTEND TO THE DRIP LINE OF THE TREE, BUT NO LESS THAN 4 FOOT RADIUS FROM THE TRUNK.

TREE PLANTING DETAIL

NOT TO SCALE



NOT FOR CONSTRUCTION

LITCHFIELD SOLAR

2-298 ROSSI RD
TORRINGTON, CT 06790, USA
LAT: 41.794157°N
LON: 73.168028°W

LITCHFIELD, CT

REV. NO	DESCRIPTION	DATE

SHEET TITLE:

LANDSCAPE DETAILS

PROJ. MGR. CM	PROJ. ENGR. MB	DATE: 04/17/23
DRAWN BY: JP	CHECKED BY: CP	SCALE: 1"=250'

DRAWING NO.

LD101

Robert Goodgame

From: Christopher Wilcox <firemarshal@townoflitchfield.org>
Sent: Friday, November 18, 2022 8:27 AM
To: Robert Goodgame
Cc: edward_bascetta@torringtonct.org; Peter LaCamera; Dee Koehler; Ali Weaver
Subject: Re: FW: [External]Re: Silicon Ranch Litchfield Solar Project

All,

I have reviewed the vegetation management plan and find that it is acceptable for the portion of the project that is within my jurisdiction.

Christopher Wilcox
Fire Marshal
Town of Litchfield

Phone: (860) 567-7568
Fax: (860) 567-7573

On Thu, Nov 17, 2022 at 5:59 PM Robert Goodgame <robert.goodgame@siliconranch.com> wrote:

Hi Chris,

Following up on the below request. We are looking to confirm we are in compliance with the CT State Fire Prevention Code, Section 11.12.3 – Ground Mounted Photovoltaic System Installation.

Thank you,

Robert Goodgame

Project Manager | Silicon Ranch

robert.goodgame@siliconranch.com

O. +1 615-760-4455 | M. +1 912-509-4450

F. +1 615-577-4604 | www.siliconranch.com

222 Second Ave S. Suite 1900 | Nashville, TN 37201

From: Robert Goodgame
Sent: Tuesday, November 8, 2022 5:41 PM
To: Christopher Wilcox <firemarshal@townoflitchfield.org>
Cc: edward_bascetta@torringtonct.org; Peter LaCamera <placamera@millerbros.us>; Dee Koehler <dee.koehler@siliconranch.com>; Ali Weaver <ali.weaver@siliconranch.com>
Subject: RE: FW: [External]Re: Silicon Ranch Litchfield Solar Project

Good evening Chris and Ed,

Please see attached the updated vegetation management plan for Litchfield to include the language around the 6" vegetation requirement. Once reviewed, please confirm we are in compliance with the CT State Fire Prevention Code, Section 11.12.3 – Ground Mounted Photovoltaic System Installation. Should you have any questions, please feel free to reach out directly.

Thank you,

Robert Goodgame

Project Manager | Silicon Ranch

robert.goodgame@siliconranch.com

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F. +1 615-577-4604 | www.siliconranch.com

222 Second Ave S. Suite 1900 | Nashville, TN 37201

From: Dee Koehler <dee.koehler@siliconranch.com>
Sent: Wednesday, September 28, 2022 3:48 PM
To: Christopher Wilcox <firemarshal@townoflitchfield.org>
Cc: edward_bascetta@torringtonct.org; Peter LaCamera <placamera@millerbros.us>; Robert Goodgame

<robert.goodgame@siliconranch.com>

Subject: RE: FW: [External]Re: Silicon Ranch Litchfield Solar Project

This is exactly the guidance that I need Christopher and will send your request for the vegetation management plan to be 6" and get the feedback from our regenerative land management team on how we can meet this requirement.

Respectfully,

Dee

(512)924-3595

From: Christopher Wilcox <firemarshal@townoflitchfield.org>

Sent: Wednesday, September 28, 2022 2:40 PM

To: Dee Koehler <dee.koehler@siliconranch.com>

Cc: edward_bascetta@torringtonct.org; Peter LaCamera <placamera@millerbros.us>; Robert Goodgame <robert.goodgame@siliconranch.com>

Subject: Re: FW: [External]Re: Silicon Ranch Litchfield Solar Project

Dee,

Ed and I met today to review your modification request. We both feel that a modification is not needed as the 2022 Connecticut State Fire Prevention Code that takes effect on 10/1/2022 allows us to approve a vegetation management plan here at the local level. This is the code that would be applicable to your project if the permits are pulled after that date. I'm assuming that you do not intend to pull your permits in the next 2 days and this will be the code that will apply. With that said Ed and I both agree that the vegetation management plan submitted is not something we would approve with the vegetation being allowed to reach a height of 24 inches before it is cut. We both agree that the vegetation should be kept to a height no more than 6 inches within the facility. Please let me know if you have any questions.

Christopher Wilcox

Fire Marshal

Town of Litchfield

Phone: (860) 567-7568

Fax: (860) 567-7573

Robert Goodgame

From: Ed Bascetta <Edward_Bascetta@torringtonct.org>
Sent: Friday, November 18, 2022 9:07 AM
To: Robert Goodgame; Christopher Wilcox
Cc: Peter LaCamera; Dee Koehler; Ali Weaver
Subject: RE: FW: [External]Re: Silicon Ranch Litchfield Solar Project

Good morning, everything looks good according to the code. Just an FYI I will be on vacation from 11-23-2022 through 1-3-2023.

In my absence you can contact either one of my Deputies [Jarred howe@torringtonct.org](mailto:Jarred_howe@torringtonct.org) or [Philip hearn@torringtonct.org](mailto:Philip_hearn@torringtonct.org) office number is 860-489-2534.

Thank you.

Edward Bascetta
Fire Marshal
City of Torrington
860-489-2534
Email edward_bascetta@torringtonct.org



From: Robert Goodgame <robert.goodgame@siliconranch.com>
Sent: Thursday, November 17, 2022 5:29 PM
To: Christopher Wilcox <firemarshal@townoflitchfield.org>
Cc: Ed Bascetta <Edward_Bascetta@torringtonct.org>; Peter LaCamera <placamera@millerbros.us>; Dee Koehler <dee.koehler@siliconranch.com>; Ali Weaver <ali.weaver@siliconranch.com>
Subject: RE: FW: [External]Re: Silicon Ranch Litchfield Solar Project

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

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Christopher Wilcox
Fire Marshal
Town of Litchfield

Phone: (860) 567-7568
Fax: (860) 567-7573



U.S. ENVIRONMENTAL PROTECTION AGENCY TIER I QUALIFIED FACILITY SPCC PLAN

Tier I Qualified Facility SPCC Plan

In the event that your facility releases oil to navigable waters or adjoining shorelines, immediately call the National Response Center (NRC) at 1-800-424-8802. The NRC is the federal government's centralized reporting center, which is staffed 24 hours per day by U.S. Coast Guard personnel.

This template constitutes the SPCC Plan for the facility, when completed and signed by the owner or operator of a facility that meets the applicability criteria in §112.3(g)(1). This template addresses the requirements of 40 CFR part 112. Maintain a complete copy of the Plan at the facility if the facility is normally attended at least four hours per day, or for a facility attended fewer than four hours per day, at the nearest field office. When making operational changes at a facility that are necessary to comply with the rule requirements, the owner/operator should follow state and local requirements (such as for permitting, design and construction) and obtain professional assistance, as appropriate.

Facility Description

Facility Name Litchfield Solar

Facility Address 298 Rossi Road

City Torrington State CT ZIP 06790

County Litchfield Tel. Number (615) 760 - 4455

Owner or Operator Name Silicon Ranch Corporation

Owner or Operator Address 222 Second Avenue South, Suite 1900

City Nashville State TN ZIP 37201

County Davidson Tel. Number (615) 760 - 4455

I. Self-Certification Statement (§112.6(a)(1))


The owner or operator of a facility certifies that each of the following is true in order to utilize this template to comply with the SPCC requirements:

- I James Barfield certify that the following is accurate:
1. I am familiar with the applicable requirements of 40 CFR part 112.
 2. I have visited and examined the facility.
 3. This Plan was prepared in accordance with accepted and sound industry practices and standards.
 4. Procedures for required inspections and testing have been established in accordance with industry inspection and testing standards or recommended practices.
 5. I will fully implement the Plan.
 6. This facility meets the following qualification criteria (under §112.3(g)(1)):
 - a. The aggregate aboveground oil storage capacity of the facility is 10,000 U.S. gallons or less; and
 - b. The facility has had no single discharge as described in §112.1(b) exceeding 1,000 U.S. gallons and no two discharges as described in §112.1(b) each exceeding 42 U.S. gallons within any twelve month period in the three years prior to the SPCC Plan self-certification date, or since becoming subject to 40 CFR part 112 if the facility has been in operation for less than three years (not including oil discharges as described in §112.1(b) that are the result of natural disasters, acts of war, or terrorism); and
 - c. There is no individual oil storage container at the facility with an aboveground capacity greater than 5,000 U.S. gallons.
 7. This Plan does not deviate from any requirement of 40 CFR part 112 as allowed by §112.7(a)(2) (environmental equivalence) and §112.7(d) (impracticability of secondary containment) or include any measures pursuant to §112.9(c)(6) for produced water containers and any associated piping.
 8. This Plan and individual(s) responsible for implementing this Plan have the full approval of management and I have committed the necessary resources to fully implement this Plan.

I also understand my other obligations relating to the storage of oil at this facility, including, among others:

1. To report any oil discharge to navigable waters or adjoining shorelines to the appropriate authorities. Notification information is included in this Plan.
2. To review and amend this Plan whenever there is a material change at the facility that affects the potential for an oil discharge, and at least once every five years. Reviews and amendments are recorded in an attached log [See Five Year Review Log and Technical Amendment Log in Attachments 1.1 and 1.2.]
3. Optional use of a contingency plan. A contingency plan:
 - a. May be used in lieu of secondary containment for qualified oil-filled operational equipment, in accordance with the requirements under §112.7(k), and.
 - b. Must be prepared for operational oil filled electrical equipment, and.
 - c. Must include an established and documented inspection or monitoring program; must follow the provisions of 40 CFR part 109; and must include a written commitment of manpower, equipment and materials to expeditiously remove any quantity of oil discharged that may be harmful. If applicable, a copy of the contingency plan and any additional documentation will be attached to this Plan as Attachment 2.

I certify that I have satisfied the requirement to prepare and implement a Plan under §112.3 and all of the requirements under §112.6(a). I certify that the information contained in this Plan is true.

Signature  _____
 Name James Barfield

Title: Director, Environmental, Health & Safety
 Date: 10 / 28/ 2021

II. Record of Plan Review and Amendments

Five Year Review (§112.5(b)):

Complete a review and evaluation of this SPCC Plan at least once every five years. As a result of the review, amend this Plan within six months to include more effective prevention and control measures for the facility, if applicable. Implement any SPCC Plan amendment as soon as possible, but no later than six months following Plan amendment. Document completion of the review and evaluation and complete the Five-Year Review Log in Attachment 1.1. If the facility no longer meets Tier I qualified facility eligibility, the owner or operator must revise the Plan to meet Tier II qualified facility requirements or complete a full PE certified Plan.

Table G-1 Technical Amendments (§§112.5(a), (c) and 112.6(a)(2))	
This SPCC Plan will be amended when there is a change in the facility design, construction, operation, or maintenance that materially affects the potential for a discharge to navigable waters or adjoining shorelines. Examples include adding or removing containers, reconstruction, replacement, or installation of piping systems, changes to secondary containment systems, changes in product stored at this facility, or revisions to standard operating procedures.	<input checked="" type="checkbox"/>
Any technical amendments to this Plan will be re-certified in accordance with Section I of this Plan template. [§112.6(a)(2)] [See Technical Amendment Log in Attachment 1.2]	<input checked="" type="checkbox"/>

III. Plan Requirements

1. Oil Storage Containers (§112.7(a)(3)(i)):

Table G-2 Oil Storage Containers and Capacities		
This table includes a complete list of all oil storage containers (aboveground containers and completely buried tanks) with capacity of 55 U.S. gallons or more, unless otherwise exempt from the rule. For mobile/portable containers, an estimated number of containers, types of oil, and anticipated capacities are provided.		<input checked="" type="checkbox"/>
Oil Storage Container <i>(indicate whether aboveground (A) or completely buried (B))</i>	Type of Oil	Shell Capacity (gallons)
Transformer #1	FR3	600
Transformer #2	FR3	800
Transformer #3	FR3	385
Transformer #4	FR3	600
Transformer #5	FR3	800
Transformer #6	FR3	600
Transformer #7	FR3	500
Transformer #8	FR3	550
Diesel Storage Tank	Diesel	2000

Total Aboveground Storage Capacity ^c 6835 gallons
Total Completely Buried Storage Capacity 0 gallons
Facility Total Oil Storage Capacity 6835 gallons

^{an} Aboveground storage container that must be included when calculating total facility oil storage capacity include tanks and mobile or portable containers; oil-filled operational equipment (e.g., transformers); other oil-filled equipment, such as flow-through process equipment. Exempt containers that are not included in the capacity calculation include: any container with a storage capacity of less than 55 gallons of oil; containers used exclusively for wastewater treatment; permanently closed containers; motive power containers; hot-mix asphalt containers; heating oil containers used solely at a single-family residence; and pesticide application equipment or related mix containers.

^b Although the criteria to determine eligibility for qualified facilities focuses on the aboveground oil storage containers at the facility, the completely buried tanks at a qualified facility are still subject to the rule requirements and must be addressed in the template; however, they are not counted toward the qualified facility applicability threshold.

^c Counts toward qualified facility applicability threshold.

2. Secondary Containment and Oil Spill Control (§§112.6(a)(3)(i) and (ii), 112.7(c) and 112.9(c)(2)):

Table G-3 Secondary Containment and Oil Spill Control	
Appropriate secondary containment and/or diversionary structures or equipment is provided for all oil handling containers, equipment, and transfer areas to prevent a discharge to navigable waters or adjoining shorelines. The entire secondary containment system, including walls and floor, is capable of containing oil and is constructed so that any discharge from a primary containment system, such as a tank or pipe, will not escape the containment system before cleanup occurs.	<input checked="" type="checkbox"/>

^a Use one of the following methods of secondary containment or its equivalent: (1) Dikes, berms, or retaining walls sufficiently impervious to contain oil; (2) Curbing; (3) Culverting, gutters, or other drainage systems; (4) Weirs, booms, or other barriers; (5) Spill diversion ponds; (6) Retention ponds; or (7) Sorbent materials.

Table G-4 below identifies the tanks and containers at the facility with the potential for an oil discharge; the mode of failure; the flow direction and potential quantity of the discharge; and the secondary containment method and containment capacity that is provided.

Table G-4 Containers with Potential for an Oil Discharge					
Area	Type of failure (discharge scenario)	Potential discharge volume (gallons)	Direction of flow for uncontained discharge	Secondary containment method	Secondary containment capacity (gallons)
<i>Bulk Storage Containers and Mobile/Portable Containers</i>					
Diesel Storage Tank 41°47'40.67"N, 73°10'2.63"W	Refueling operations, external damage	2000	South	Double-walled tank & secondary containment - temp	2750
<i>Oil-filled Operational Equipment (e.g., hydraulic equipment, transformers) ^c</i>					
Transformer #1 41°47'31.83"N, 73°10'4.72"W	Damage to cooling fins, external corrosion	600	East	Oil Spill Contingency Plan	N/A
Transformer #2 41°47'30.31"N, 73° 9'47.80"W	Damage to cooling fins, external corrosion	800	West	Oil Spill Contingency Plan	N/A
Transformer #3 41°47'36.15"N, 73° 9'52.07"W	Damage to cooling fins, external corrosion	385	West	Oil Spill Contingency Plan	N/A
Transformer #4 41°47'36.14"N, 73° 9'51.52"W	Damage to cooling fins, external corrosion	600	West	Oil Spill Contingency Plan	N/A
Transformer #5 41°47'40.74"N, 73° 9'52.11"W	Damage to cooling fins, external corrosion	800	West	Oil Spill Contingency Plan	N/A
Transformer #6 41°47'40.75"N, 73° 9'51.54"W	Damage to cooling fins, external corrosion	600	West	Oil Spill Contingency Plan	N/A
Transformer #7 41°47'39.37"N, 73°10'11.19"W	Damage to cooling fins, external corrosion	500	East	Oil Spill Contingency Plan	N/A
Transformer #8 41°47'56.31"N, 73° 9'47.93"W	Damage to cooling fins, external corrosion	550	East	Oil Spill Contingency Plan	N/A
<i>Piping, Valves, etc.</i>					
<i>Product Transfer Areas (location where oil is loaded to or from a container, pipe or other piece of equipment.)</i>					
<i>Other Oil-Handling Areas or Oil-Filled Equipment (e.g., flow-through process vessels at an oil production facility)</i>					

^a Use one of the following methods of secondary containment or its equivalent: (1) Dikes, berms, or retaining walls sufficiently impervious to contain oil; (2) Curbing; (3) Culverting, gutters, or other drainage systems; (4) Weirs, booms, or other barriers; (5) Spill diversion ponds; (6) Retention ponds; or (7) Sorbent materials.

^b for storage tanks and bulk storage containers, the secondary containment capacity must be at least the capacity of the largest container plus additional capacity to contain rainfall or other precipitation.

^c for oil-filled operational equipment: Document in the table above if alternative measures to secondary containment (as described in §112.7(k)) are implemented at the facility.

3. Inspections, Testing, Recordkeeping and Personnel Training (§§112.7(e) and (f), 112.8(c)(6) and (d)(4), 112.9(c)(3), 112.12(c)(6) and (d)(4)):

Table G-5 Inspections, Testing, Recordkeeping and Personnel Training	
An inspection and/or testing program is implemented for all aboveground bulk storage containers and piping at this facility. [§§112.8(c)(6) and (d)(4), 112.9(c)(3), 112.12(c)(6) and (d)(4)]	<input checked="" type="checkbox"/>
The following is a description of the inspection and/or testing program (e.g., reference to industry standard utilized, scope, frequency, method of inspection or test, and person conducting the inspection) for all aboveground bulk storage containers and piping at this facility:	
<p>Silicon Ranch Corporation "SRC" has overall responsibility for this plan and the site EHS representative will review the inspection reports of each responsible subcontractor and perform an audit of these inspections every two weeks. All pertinent SRC personnel have been trained in the requirements of 40 CFR 112.</p> <p>During construction operations, a Miller Brothers designated employee will inspect Diesel Storage Tank daily and the pad mount transformers weekly for leaks and spills. This inspection will be documented and submitted weekly to SRC EHS representative.</p> <p>All Miller Brothers personnel will be briefed on the SPCC Plan prior to working at the site, and spill prevention will be a topic discussed at least once per quarter at safety meetings. Miller Brothers instructs its personnel in the operation and maintenance of equipment to prevent discharges of oil. The SPCC training and periodic briefings will highlight and describe on-the-job environmental updates, known spill events or failures, malfunctioning components, and recently developed precautionary measures. With this training, the personnel will recognize the importance of the need for prevention and control of oil spills.</p> <p>Miller Brothers employees specifically responsible for handling and installation of the oil are thoroughly trained as to the proper techniques that must be used to reduce the probability of an oil spill. Special emphasis is directed toward these employees since the likelihood of an oil spill is more prevalent during this handling process. Maintenance and installation personnel have received basic training in handling hazardous materials and are certified by OSHA.</p>	
Inspections, tests, and records are conducted in accordance with written procedures developed for the facility. Records of inspections and tests kept under usual and customary business practices will suffice for purposes of this paragraph. [§112.7(e)]	<input checked="" type="checkbox"/>
A record of the inspections and tests are kept at the facility or with the SPCC Plan for a period of three years. [§112.7(e)] [See Inspection Log and Schedule in Attachment 3.1]	<input checked="" type="checkbox"/>
Inspections and tests are signed by the appropriate supervisor or inspector. [§112.7(e)]	<input checked="" type="checkbox"/>
Personnel, training, and discharge prevention procedures [§112.7(f)]	
Oil-handling personnel are trained in the operation and maintenance of equipment to prevent discharges; discharge procedure protocols; applicable pollution control laws, rules, and regulations; general facility operations; and the contents of the facility SPCC Plan. [§112.7(f)]	<input checked="" type="checkbox"/>
A person who reports to facility management is designated and accountable for discharge prevention. [§112.7(f)] Name/Title: <u>Dee Kohler</u>	<input checked="" type="checkbox"/>
Discharge prevention briefings are conducted for oil-handling personnel annually to assure adequate understanding of the SPCC Plan for that facility. Such briefings highlight and describe past reportable discharges or failures, malfunctioning components, and any recently developed precautionary measures. [§112.7(f)] [See Oil-handling Personnel Training and Briefing Log in Attachment 3.4]	<input checked="" type="checkbox"/>

4. Security (excluding oil production facilities) §112.7(g):**Table G-6 Implementation and Description of Security Measures**

Security measures are implemented at this facility to prevent unauthorized access to oil handling, processing, and storage area.

The following is a description of how you secure and control access to the oil handling, processing, and storage areas; secure master flow and drain valves; prevent unauthorized access to starter controls on oil pumps; secure out-of-service and loading/unloading connections of oil pipelines; address the appropriateness of security lighting to both prevent acts of vandalism and assist in the discovery of oil discharges:

To prevent unauthorized access, the entire site is surrounded by an 8-foot-high fence inclusive of 2-foot barbed wire topper, and all gates are securely locked. The fence and gates are conspicuously marked with posted signs as a warning to intruders that they are trespassing on private property where dangerous high-voltage equipment is located.

5. Emergency Procedures and Notifications (§112.7(a)(3)(iv) and 112.7(a)(5)):**Table G-7 Description of Emergency Procedures and Notifications**

The following is a description of the immediate actions to be taken by facility personnel in the event of a discharge to navigable waters or adjoining shorelines [§112.7(a)(3)(iv) and 112.7(a)(5)]:

Personnel shall take the following actions in response to an oil spill event:

1. Protect yourself:
 - a. Be aware of electrical hazards
 - b. Determine exposure routes from chemical contaminants (if applicable)
 - c. Wear and use proper protective gear (glove and eye protection at a minimum)
2. Contain the spill:
 - a. Construct earthen berms to divert potential entry into drains and waterways
 - b. Use absorbent materials available in the provided spill kits
3. Secure the area:
 - a. Isolate the area to prevent access.
 - b. Limit entry into the area to authorized personnel wearing appropriate protective gear.
 - c. Use plastic over the spill area to prevent additional spreading or human contact.
 - d. Post warning signs.
4. Report the spill:
 - a. Contact Silicon Ranch Corporation and Miller Brothers EPC who are responsible for effective construction operations of North Stonington Solar with the following information:
 - i. Location
 - ii. Source of Spill
 - iii. Volume of spill
 - iv. Extents of spill within the property or beyond
 - v. Identification of the equipment
 - vi. Individuals known to be in contact with the oil
 - b. Miller Brothers EPC will direct crews to the spill site.
 - c. Silicon Ranch Corporation will contact the necessary environmental agencies as show in the oil reporting procedure.
5. Proceed with cleanup activities:
 - a. For small spills,
 - i. Use a sump or other mechanism to remove oil from spill site and place in a sealed 55-gallon drum or spill kit drum.
 - ii. excavate the contaminated soil with onsite tools and equipment. Place excavated soil into sealed 55-gallon drums or spill kit drum for proper disposal.
 - b. For large spills,

Contact remediation contractor, Clean Harbors, for soil excavation.

6. Contact List (§112.7(a)(3)(vi)):

Table G-8 Contact List	
Contact Organization / Person	Telephone Number
National Response Center (NRC)	1-800-424-8802
Cleanup Contractor(s) Clean Harbors – Bristol Technical Services	(860) 583-8917
Key Facility Personnel	
Designated Person Accountable for Discharge Prevention: Dee Kohler Silicon Ranch Corporation	Office: (512) 924-3595 Emergency: (512) 924-3595
Jim Barfield Silicon Ranch Corporation	Office: (704) 985-3316 Emergency: (704) 985-3316
Peter LaCamera Miller Brothers	Office: N/A Emergency: (610) 246-1267
State Oil Pollution Control Agencies Department of Energy and Environmental Protection (DEEP)	(866) 337-7745 (860) 424-3338
Local Fire Department East Litchfield Fire Department	911 OR (860) 482-1929
Local Police Department Connecticut State Police	911 OR (860) 535-1451
Hospital Charlotte Hungerford Hospital	911 OR (860) 496-6666
Other Contact References (e.g., downstream water intakes or neighboring facilities)	

7. NRC Notification Procedure (§112.7(a)(4) and (a)(5)):

Table G-9 NRC Notification Procedure	
In the event of a discharge of oil to navigable waters or adjoining shorelines, the following information identified in Attachment 4 will be provided to the National Response Center immediately following identification of a discharge to navigable waters or adjoining shorelines [See Discharge Notification Form in Attachment 4]: [§112.7(a)(4)]	☒
<ul style="list-style-type: none"> • The exact address or location and phone number of the facility. • Date and time of the discharge. • Type of material discharged. • Estimate of the total quantity discharged. • Estimate of the quantity discharged to navigable waters. • Source of the discharge; 	<ul style="list-style-type: none"> • Description of all affected media. • Cause of the discharge. • Any damages or injuries caused by the discharge. • Actions being used to stop, remove, and mitigate the effects of the discharge. • Whether an evacuation may be needed; and • Names of individuals and/or organizations who have also been contacted.

8. SPCC Spill Reporting Requirements (Report within 60 days) (§112.4):

Submit information to the EPA Regional Administrator (RA) and the appropriate agency or agencies in charge of oil pollution control activities in the State in which the facility is located within 60 days from one of the following discharge events:

- A single discharge of more than 1,000 U.S. gallons of oil to navigable waters or adjoining shorelines or
- Two discharges to navigable waters or adjoining shorelines each more than 42 U.S. gallons of oil occurring within any twelve-month period

You must submit the following information to the RA:

- (1) Name of the facility.
- (2) Your name.
- (3) Location of the facility.
- (4) Maximum storage or handling capacity of the facility and normal daily throughput.
- (5) Corrective action and countermeasures you have taken, including a description of equipment repairs and replacements.
- (6) An adequate description of the facility, including maps, flow diagrams, and topographical maps, as necessary.
- (7) The cause of the reportable discharge, including a failure analysis of the system or subsystem in which the failure occurred; and
- (8) Additional preventive measures you have taken or contemplated to minimize the possibility of recurrence
- (9) Such other information as the Regional Administrator may reasonably require pertinent to the Plan or discharge

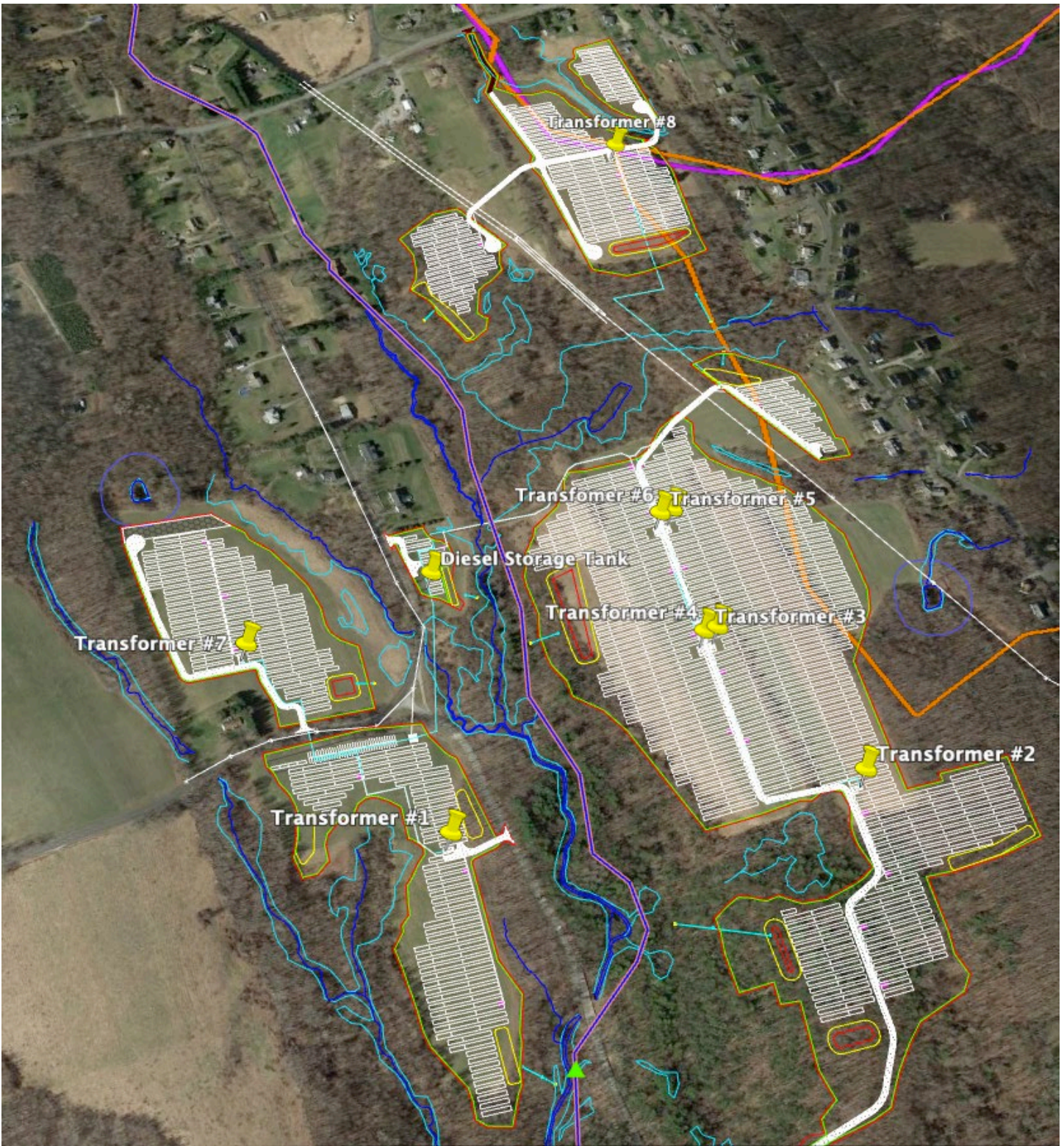
* * * * *

A. Onshore Facilities (excluding production) (§§112.8(b) through (d), 112.12(b) through (d)):

The owner or operator must meet the general rule requirements as well as requirements under this section. Note that not all provisions may be applicable to all owners/operators. For example, a facility may not maintain completely buried metallic storage tanks installed after January 10, 1974, and thus would not have to abide by requirements in §§112.8(c)(4) and 112.12(c)(4), listed below. **In cases where a provision is not applicable, write "N/A".**

Table G-10 General Rule Requirements for Onshore Facilities	N/A
Drainage from diked storage areas is restrained by valves to prevent a discharge into the drainage system or facility effluent treatment system, except where facility systems are designed to control such discharge. Diked areas may be emptied by pumps or ejectors that must be manually activated after inspecting the condition of the accumulation to ensure no oil will be discharged. [§§112.8(b)(1) and 112.12(b)(1)]	<input type="checkbox"/> <input checked="" type="checkbox"/>
Valves of manual, open-and-closed design are used for the drainage of diked areas. [§§112.8(b)(2) and 112.12(b)(2)]	<input type="checkbox"/> <input checked="" type="checkbox"/>
The containers at the facility are compatible with materials stored and conditions of storage such as pressure and temperature. [§§112.8(c)(1) and 112.12(c)(1)]	<input checked="" type="checkbox"/> <input type="checkbox"/>
Secondary containment for the bulk storage containers (including mobile/portable oil storage containers) holds the capacity of the largest container plus additional capacity to contain precipitation. Mobile or portable oil storage containers are positioned to prevent a discharge as described in §112.1(b). [§112.6(a)(3)(ii)]	<input checked="" type="checkbox"/> <input type="checkbox"/>
If uncontaminated rainwater from diked areas drains into a storm drain or open watercourse the following procedures will be implemented at the facility: [§§112.8(c)(3) and 112.12(c)(3)] <ul style="list-style-type: none"> • Bypass valve is normally sealed closed • Retained rainwater is inspected to ensure that its presence will not cause a discharge to navigable waters or adjoining shorelines • Bypass valve is opened and resealed under responsible supervision • Adequate records of drainage are kept [See Dike Drainage Log in Attachment 3.3] 	<input type="checkbox"/> <input checked="" type="checkbox"/> <input type="checkbox"/> <input checked="" type="checkbox"/> <input type="checkbox"/> <input checked="" type="checkbox"/> <input type="checkbox"/> <input checked="" type="checkbox"/>
For completely buried metallic tanks installed on or after January 10, 1974, at this facility [§§112.8(c)(4) and 112.12(c)(4)]: <ul style="list-style-type: none"> • Tanks have corrosion protection with coatings or cathodic protection compatible with local soil conditions. • Regular leak testing is conducted. 	<input type="checkbox"/> <input checked="" type="checkbox"/> <input type="checkbox"/> <input checked="" type="checkbox"/>
For partially buried or bunkered metallic tanks [§112.8(c)(5) and §112.12(c)(5)]: <ul style="list-style-type: none"> • Tanks have corrosion protection with coatings or cathodic protection compatible with local soil conditions. 	<input type="checkbox"/> <input checked="" type="checkbox"/>
Each aboveground bulk container is tested or inspected for integrity on a regular schedule and whenever material repairs are made. Scope and frequency of the inspections and inspector qualifications are in accordance with industry standards. Container supports and foundations are regularly inspected. [See Inspection Log and Schedule and Bulk Storage Container Inspection Schedule in Attachments 3.1 and 3.2] [§112.8(c)(6) and §112.12(c)(6)(i)]	<input checked="" type="checkbox"/> <input type="checkbox"/>
Outsides of bulk storage containers are frequently inspected for signs of deterioration, discharges, or accumulation of oil inside diked areas. [See Inspection Log and Schedule in Attachment 3.1] [§§112.8(c)(6) and 112.12(c)(6)]	<input checked="" type="checkbox"/> <input type="checkbox"/>
For bulk storage containers that are subject to 21 CFR part 110 which are shop-fabricated, constructed of austenitic stainless steel, elevated and have no external insulation, formal visual inspection is conducted on a regular schedule. Appropriate qualifications for personnel performing tests and inspections are documented. [See Inspection Log and Schedule and Bulk Storage Container Inspection Schedule in Attachments 3.1 and 3.2] [§112.12(c)(6)(ii)]	<input type="checkbox"/> <input checked="" type="checkbox"/>

Table G-10 General Rule Requirements for Onshore Facilities		N/A
<p>Procedure</p> <p>A. (For vehicle and equipment fueling)</p> <ol style="list-style-type: none"> 1. The vehicle engine shall be off. 2. Prior to fueling, the valve on any secondary containment shall be closed and any nearby basins covered with the provided flexible rubber mat. 3. Ensure that the fuel is the proper type of fuel. 4. Verify that absorbent spill clean-up materials and spill kits are available in the fueling area. 5. Nozzles used in vehicle and equipment fueling shall be equipped with an automatic shut-off to prevent overflow. 6. Fuel tanks shall not be "topped-off". 7. Clearly post in a prominent area of the fueling area, instructions for safe operation offueling equipment, and appropriate contact information for the person(s) responsible for spill response. 8. Clearly label fuel pump master shut-off switch and maintain clear and easy access 9. Fuel may only be dispensed by a trained and designated employee. 10. When not in use and if practical, the pump is to remain locked. During normal working hours, the pump key is to be stored by project supervision. <p>Spill Response</p> <ol style="list-style-type: none"> 1. Conduct cleanups of any fuel spills immediately after discovery. 2. Uncontained spills are to be cleaned using dry cleaning methods only. Spills shall be cleaned up with a dry, absorbent material (e.g., kitty litter, sawdust, etc.) and absorbent materials shall be collected and placed in a container for disposal. 3. Collected waste is to be disposed of properly. 4. Contact the Silicon Ranch Corporation EHS&S Department to report. <p>Maintenance and Inspection</p> <ol style="list-style-type: none"> 1. Fueling areas shall be inspected daily. 2. Keep an ample supply of spill cleanup material on the site. 3. Any equipment, tanks, pumps, piping and fuel dispensing equipment found to be leaking or in disrepair must be repaired or replaced immediately. 	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Liquid level sensing devices are regularly tested to ensure proper operation [See Inspection Log and Schedule in Attachment 3.1]. [§112.6(a)(3)(iii)]	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Visible discharges which result in a loss of oil from the container, including but not limited to seams, gaskets, piping, pumps, valves, rivets, and bolts are promptly corrected and oil in diked areas is promptly removed. [§§112.8(c)(10) and 112.12(c)(10)]	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Aboveground valves, piping, and appurtenances such as flange joints, expansion joints, valve glands and bodies, catch pans, pipeline supports, locking of valves, and metal surfaces are inspected regularly. [See Inspection Log and Schedule in Attachment 3.1] [§§112.8(d)(4) and 112.12(d)(4)]	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Integrity and leak testing are conducted on buried piping at the time of installation, modification, construction, relocation, or replacement. [See Inspection Log and Schedule in Attachment 3.1] [§§112.8(d)(4) and 112.12(d)(4)]	<input type="checkbox"/>	<input checked="" type="checkbox"/>



ATTACHMENT 1 – Five Year Review and Technical Amendment Logs

ATTACHMENT 1.1 – Five Year Review Log

I have completed a review and evaluation of the SPCC Plan for this facility and will/will not amend this Plan as a result.

Table G-13 Review and Evaluation of SPCC Plan for Facility			
Review Date	Plan Amendment		Name and signature of person authorized to review this Plan
	Will Amend	Will Not Amend	
	<input type="checkbox"/>	<input type="checkbox"/>	
	<input type="checkbox"/>	<input type="checkbox"/>	
	<input type="checkbox"/>	<input type="checkbox"/>	
	<input type="checkbox"/>	<input type="checkbox"/>	
	<input type="checkbox"/>	<input type="checkbox"/>	
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	<input type="checkbox"/>	<input type="checkbox"/>	
	<input type="checkbox"/>	<input type="checkbox"/>	
	<input type="checkbox"/>	<input type="checkbox"/>	

ATTACHMENT 1.2 – Technical Amendment Log

Any technical amendments to this Plan will be re-certified in accordance with Section I of this Plan template.

Table G-15 Description and Certification of Technical Amendments		
Review Date	Description of Technical Amendment	Name and signature of person certifying this technical amendment

ATTACHMENT 2 – Oil Spill Contingency Plan and Checklist

An oil spill contingency plan and written commitment of resources is required for:

- Qualified oil-filled operational equipment which has no secondary containment.

An oil spill contingency plan meeting the provisions of 40 CFR part 109, as described below, and a written commitment of manpower, equipment and materials required to expeditiously control and remove any quantity of oil discharged that may be harmful is attached to this Plan.	<input checked="" type="checkbox"/>
--	-------------------------------------

Complete the checklist below to verify that the necessary operations outlined in 40 CFR part 109 - Criteria for State, Local and Regional Oil Removal Contingency Plans - have been included.

Table G-15 Checklist of Development and Implementation Criteria for State, Local and Regional Oil Removal Contingency Plans (§109.5) ^a	
(a) Definition of the authorities, responsibilities and duties of all persons, organizations or agencies which are to be involved in planning or directing oil removal operations.	<input checked="" type="checkbox"/>
(b) Establishment of notification procedures for the purpose of early detection and timely notification of an oil discharge including: <ul style="list-style-type: none"> (1) The identification of critical water use areas to facilitate the reporting of and response to oil discharges. (2) A current list of names, telephone numbers and addresses of the responsible persons (with alternates) and organizations to be notified when an oil discharge is discovered. (3) Provisions for access to a reliable communications system for timely notification of an oil discharge, and the capability of interconnection with the communications systems established under related oil removal contingency plans, particularly State and National plans (e.g., NCP). (4) An established, prearranged procedure for requesting assistance during a major disaster or when the situation exceeds the response capability of the State, local or regional authority. 	<input checked="" type="checkbox"/> <input checked="" type="checkbox"/> <input checked="" type="checkbox"/> <input checked="" type="checkbox"/>
(c) Provisions to assure that full resource capability is known and can be committed during an oil discharge situation including: <ul style="list-style-type: none"> (1) The identification and inventory of applicable equipment, materials and supplies which are available locally and regionally. (2) An estimate of the equipment, materials and supplies which would be required to remove the maximum oil discharge to be anticipated. (3) Development of agreements and arrangements in advance of an oil discharge for the acquisition of equipment, materials and supplies to be used in responding to such a discharge. 	<input checked="" type="checkbox"/> <input checked="" type="checkbox"/> <input checked="" type="checkbox"/>
(d) Provisions for well defined and specific actions to be taken after discovery and notification of an oil discharge including: <ul style="list-style-type: none"> (1) Specification of an oil discharge response operating team consisting of trained, prepared, and available operating personnel. (2) Predesignation of a properly qualified oil discharge response coordinator who is charged with the responsibility and delegated commensurate authority for directing and coordinating response operations and who knows how to request assistance from Federal authorities operating under existing national and regional contingency plans. (3) A preplanned location for an oil discharge response operations center and a reliable communications system for directing the coordinated overall response operations. (4) Provisions for varying degrees of response effort depending on the severity of the oil discharge. (5) Specification of the order of priority in which the various water uses are to be protected where more than one water use may be adversely affected as a result of an oil discharge and where response operations may not be adequate to protect all uses. (6) Specific and well-defined procedures to facilitate recovery of damages and enforcement measures as provided for by State and local statutes and ordinances. 	<input checked="" type="checkbox"/> <input checked="" type="checkbox"/> <input checked="" type="checkbox"/> <input checked="" type="checkbox"/> <input checked="" type="checkbox"/> <input checked="" type="checkbox"/>

^a the contingency plan must be consistent with all applicable state and local plans, Area Contingency Plans, and the National Contingency Plan (NCP)

ATTACHMENT 3 – Inspections, Dike Drainage and Personnel Training Logs

ATTACHMENT 3.1 – Inspection Log and Schedule

Table G-16 Inspection Log and Schedule
 This log is intended to document compliance with §§112.6(a)(3)(iii), 112.8(c)(6), 112.8(d)(4), 112.9(b)(2), 112.9(c)(3), 112.9(d)(1), 112.9(d)(4), 112.12.(c)(6), and 112.12(d)(4), as applicable.

Date of Inspection	Container / Piping / Equipment	Describe Scope (Or cite Industry Standard)	Observations	Name/ Signature of Inspector	Records maintained separately ^a
					<input type="checkbox"/>
					<input type="checkbox"/>
					<input type="checkbox"/>
					<input type="checkbox"/>
					<input type="checkbox"/>

^a Indicate in the table above if records of facility inspections are maintained separately at this facility.

ATTACHMENT 3.2 – Bulk Storage Container Inspection Schedule – onshore facilities (excluding production):

To comply with integrity inspection requirement for bulk storage containers, inspect/test each shop-built aboveground bulk storage container on a regular schedule in accordance with a recognized container inspection standard based on the minimum requirements in the following table.

Table G-17 Bulk Storage Container Inspection Schedule	
Container Size and Design Specification	Inspection requirement
Portable containers (including drums, totes, and intermodal bulk containers (IBC))	Visually inspect monthly for signs of deterioration, discharges or accumulation of oil inside diked areas
55 to 1,100 gallons with sized secondary containment	Visually inspect monthly for signs of deterioration, discharges or accumulation of oil inside diked areas plus any annual inspection elements per industry inspection standards
1,101 to 5,000 gallons with sized secondary containment and a means of leak detection	
1,101 to 5,000 gallons with sized secondary containment and no method of leak detection	Visually inspect daily for signs of deterioration, discharges or accumulation of oil inside diked areas, plus any annual inspection elements and other specific integrity tests that may be required per industry inspection standards

^{an} Examples of leak detection include, but are not limited to, double-walled tanks and elevated containers where a leak can be visually identified.

ATTACHMENT 3.3 – Dike Drainage Log

Table G-18 Dike Drainage Log

Date	Bypass valve sealed closed	Rainwater inspected to be sure no oil (or sheen) is visible	Open bypass valve and reseal it following drainage	Drainage activity supervised	Observations	Signature of Inspector
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		

ATTACHMENT 3.4 – Oil-handling Personnel Training and Briefing Log

Table G-19 Oil-Handling Personnel Training and Briefing Log

Date	Description / Scope	Attendees

ATTACHMENT 4 – Discharge Notification Form

In the event of a discharge of oil to navigable waters or adjoining shorelines, the following information will be provided to the National Response Center [also see the notification information provided in Section 7 of the Plan]:

Table G-20 Information provided to the National Response Center in the Event of a Discharge			
Discharge/Discovery Date		Time	
Facility Name			
Facility Location (Address/Lat-Long/Section Township Range)			
Name of reporting individual		Telephone #	
Type of material discharged		Estimated total quantity discharged	Gallons/Barrels
Source of the discharge		Media affected	<input type="checkbox"/> Soil
			<input type="checkbox"/> Water (specify)
			<input type="checkbox"/> Other (specify)
Actions taken			
Damage or injuries	<input type="checkbox"/> No <input type="checkbox"/> Yes (specify)	Evacuation needed?	<input type="checkbox"/> No <input type="checkbox"/> Yes (specify)
Organizations and individuals contacted	<input type="checkbox"/> National Response Center 800-424-8802 Time		
	<input type="checkbox"/> Cleanup contractor (Specify) Time		
	<input type="checkbox"/> Facility personnel (Specify) Time		
	<input type="checkbox"/> State Agency (Specify) Time		
	<input type="checkbox"/> Other (Specify) Time		

Silicon Ranch Corporation Litchfield Solar Facility OIL SPILL CONTINGENCY PLAN

PART I Introduction

1.1 Purpose and Scope

This Oil Spill Contingency Plan is prepared in accordance with 40 CFR 112.7(d) to address areas of the facility where secondary containment is impracticable, as documented in the facility Spill Prevention, Control, and Countermeasure (SPCC) Plan.

The purpose of this Oil Spill Contingency Plan ("Contingency Plan") is to define procedures and tactics for responding to discharges of oil into navigable waters or adjoining shorelines of the United States, originating more specifically from flowlines at Silicon Ranch's Litchfield Solar Facility. The Contingency Plan is implemented whenever a discharge of oil has reached, or threatens, navigable waters or adjoining shorelines.

The objective of procedures described in this Contingency Plan is to protect the public, Silicon Ranch, subcontractor personnel, and other responders during oil discharges. In addition, the Plan is intended to minimize damage to the environment, natural resources, and facility installations from a discharge of oil. This Oil Spill Contingency Plan complements the prevention and control measures presented in the facility's SPCC Plan by addressing areas of the facility that have inadequate secondary containment and impacts that may result from a discharge from these areas. Areas lacking adequate containment at the Litchfield Solar Facility include the (8) pad mounted oil-filled electrical transformers due to infeasibility of transformer containment.

This Oil Spill Contingency Plan follows the content and organization of 40 CFR part 109 and describes the distribution of responsibilities and basic procedures for responding to an oil discharge and performing cleanup operations.

1.2 Resources at Risk - 40 CFR 109.5(b)(1)

Silicon Ranch's Litchfield Solar Project is located approximately 2.7 miles East of Torrington, CT, within the Housatonic watershed (see Figure C-1 in Appendix C). The waterway closest to the facility is the Naugatuck River, which flows approximately 2 miles to the East of the facility, in a North to South direction and receives water from Gulf Stream which receives water from the unnamed stream that bisects the project. The facility diagram included in Appendix C (Figure C-2) indicates the location of the oil containing pad mounted transformers and diesel storage tank. Ground cover at the facility consists of compacted soil, gravel, and low-lying vegetation.

The site can be divided into two sections (East and West) by a geological depression running north to south and contains the unnamed stream. The natural topography of the West section land drains in an easterly direction, while the eastern section drains to the West. Surface drainage from the facility therefore flows towards the unnamed stream that flows south of the site to flow into Gulf Stream.

There are several residences within the immediate vicinity of the facility (<0.25 miles). The closest residences are located .05 mile to the north and west of the site. All residences appear to have private drinking water wells. SRC will coordinate with the Torrington fire and/or police department and with its residential neighbors to provide the appropriate warnings in the event of a discharge that could affect public health and safety.

1.3 Risk Assessment - 40 CFR 109.5(c)(2)

The facility is comprised of approximately 8 pad mounted electrical transformers filled with varying amounts of FR3 oil (385 gal to 800 gal) and one 2000-gallon diesel storage tank for refueling of equipment. All transformers and tanks are above ground. The pad mounted transformers do not have secondary containment as it would be impractical given the multiple conduit penetrations below the equipment. The diesel storage tank has both a double-lined tank and secondary containment adequate to capture flow if the tank is damaged. The daily usage rate of diesel is currently unknown but estimated to be less than 500 gallons. There is no daily usage for the oil filled equipment that is the pad mounted transformers.

A discharge of oil could potentially reach the unnamed stream in the center of the property. The velocity of oil over land is estimated, based on experience and a simple calculation of flow over short grass pastureland, at approximately 0.2 feet/second. Considering the distance between Transformer #1 and/or 2000-gallon diesel storage tank and the unnamed stream to the west (405 feet) and an assumed 2-foot elevation gradient, the oil, if unimpeded, could reach the unnamed stream in as little as 0.5 hours.

1.4 Response Strategy

SRC personnel and contractors are equipped and trained to respond to certain “minor discharges” confined within the facility. Minor discharges can generally be described as those where the quantity of product discharged is small, the discharged material can be easily stopped and controlled, the discharge is localized, and the product is not likely to seep into groundwater or reach surface water or adjoining shorelines. Procedures for responding to these minor discharges are covered in the SPCC Plan.

This Contingency Plan addresses all discharge incidents, including those that affect navigable waters or during which the oil cannot be safely controlled by facility personnel and confined within the boundaries of the facility. Response to such incidents may necessitate the assistance of outside contractors or other responders to prevent imminent impact to navigable waters.

PART II

Spill Discovery and Response

2.1 Distribution of Responsibilities - 40 CFR 109.5(a), 40 CFR 109.5(d)(2), & 40 CFR 109.5(b)(2)

Silicon Ranch Corporation has the primary responsibility for coordinating the initial response to oil discharge incidents originating from its facility through its contractor Miller Bros. To accomplish this, SRC has designated the Field Operations Manager, TO BE DETERMINED, as the qualified oil discharge response Coordinator (RC) in the event of an oil discharge.

The RC plays a central coordinating role in any emergency, as illustrated in the emergency organization chart in Figure 2-1.

The RC has the authority to commit the necessary services and equipment to respond to the discharge and to request assistance from Torrington fire and/or police departments, contractors, or other responders, as appropriate.

The RC will direct notifications and initial response actions in accordance with training and capabilities. In the event of a fire or emergency that threatens the health and safety of those present at the site, the RC will direct evacuations and contact the fire and/or police departments.

In the event of an emergency involving outside response agencies, the RC's primary responsibility is to provide information regarding the characteristics of the materials and equipment involved and to provide access to the SRC Director of EHS&S as requested. The RC shall also take necessary measures to control the flow of people, emergency equipment, and supplies and obtain the support of the Torrington Police Department or Connecticut State Police as needed to maintain control of the site. These controls may be necessary to minimize injuries and confusion.

Finally, the RC serves as the coordinator for communications by acquiring all essential information and ensuring clear communication of information to emergency response personnel. The RC has access to reference material at the field office either as printed material or on computer files that can further assist the response activities.

Whenever circumstances permit, the RC transmits assessments and recommendations to SRC Senior Management for direction. Senior Management is contacted in the following order: (1) Vice-President - Projects; (2) Sr. Vice-President of Project Delivery; (3) Sr. Vice-President of Operations.

If the Field Operations Manager is not available, the responsibility and authority for initiating a response to a discharge rest with the EHS Site Construction Manager or most senior Miller Bros. EPC representative on site at the time the discharge is discovered.

2.2 Response Activities- 40 CFR 109.5(d) & 40 CFR 109.5(e)

In the event of a discharge, the first priority is to stop the product flow and to shut off all ignition sources, followed by the containment, control, and mitigation of the discharge. This Contingency Plan breaks actions to be performed to respond to an oil discharge into different phases, described in greater detail in the checklists below.

2.2.1 Discharge Discovery and Source Control

Minor Discharge. A minor discharge (i.e., small volume leak from flowlines or other equipment) will be discovered by SRC or Miller Bros. personnel during scheduled daily or monthly visits to the facility. Aboveground diesel fueling stations are visually inspected formally once a day during the normal inspection rounds. Pad mounted oil filled transformers will be inspected once a week during normal inspection rounds.

Major Discharge. A more severe and sudden discharge will be the result of an accident involving catastrophic damage to the storage containers and will be detected and reported immediately.

Notifications to the National Response Center, Connecticut authorities, and Litchfield's Emergency Committee must occur immediately upon discovery of reportable discharges.

Completed	Actions
	Immediately report the discharge to the RC, providing the following information: <ul style="list-style-type: none"> • Exact location; • Material involved; • Quantity involved; • Topographic and environmental conditions; • Circumstances that may hinder response; and • Injuries, if any.
	Retrieve onsite spill response kits and deploy to the site of the spill
	Using appropriate methods equipment stop the flow of oil from storage containers and stem and surface flow from farther progress across site.

2.2.2 Assessment and Notifications

Completed	Actions
	Investigate the discharge to assess the actual or potential threat to human health or the environment: <ul style="list-style-type: none"> • Location of the discharge relative to receiving waterbodies. • Quantity of spilled material. • Ambient conditions (temperature, rain). • Other contributing factors such as fire or explosion hazards; and • Sensitive receptors downstream.
	Request outside assistance from local emergency responders, as needed.
	IF NEEDED Notify immediately: <ul style="list-style-type: none"> • 911 • National Response Center • Response contractor(s) – Clean Harbors – Chattanooga, TN • Litchfield County Emergency Planning Committee • State authorities
	Communicate with neighboring property owners regarding the discharge and actions taken to mitigate the damage.
	If the oil reaches (or threatens to reach) the Nolichucky River, notify the local fire/policedepartments to limit access to the River by local residents until the oil has been contained and recovered. Additionally, notify downstream water users of the spill and of actions that will be taken to protect these downstream receptors.

2.2.3 Control and Recovery

The RC directs the initial control of the oil flow by SRC and/or Miller Bros. personnel. The actions taken will depend on whether the oil has reached water or is still on land. All effort will be made to prevent oil from reaching water.

If the oil has not yet reached water:

Completed	Actions
	Deploy sandbags and/or absorbent socks downgradient from the oil, or erect temporary barriers such as trenches or mounds to prevent the oil from flowing towards the unnamed creeks on the western and southern sides of the property.
	Implement land-based response actions (countermeasure) such as digging temporary containment pits, ponds, or curbs to prevent the flow of oil into the river.
	Deploy absorbent sock and sorbent material along the shoreline to prevent oil from entering waters.

If the oil has reached water:

Completed	Actions
	Contact cleanup contractor(s).
	Deploy floating booms immediately downstream from the release point. Big Bear Creek is narrow and shallow. Floating boom deployment does not require the use of a boat.
	Control oil flow on the ground by placing absorbent socks and other sorbent material or physical barriers (e.g., "kitty litter," sandbags, earthen berm, trenches) across the oil flow path.
	Deploy additional floating booms across the whole width of the Creek at the next access point downstream from the release point.
	Deploy protective booming measures for downstream receptors that may be impacted by the spill.

2.2.4 Disposal of Recovered Product and Contaminated Response Material

The RC ensures that all contaminated materials classified as hazardous waste are disposed of in accordance with all applicable solid and hazardous waste regulations.

Completed	Actions
	Place any recovered product that can be recycled into the secure containers to be separated and recycled.
	Dispose of recovered product not suitable for on-site recycling with the rest of the waste collected during the response efforts.

	Collect all debris in properly labeled waste containers (impervious bags, drums, or buckets).
	Dispose of contaminated material in accordance with all applicable solid and hazardous waste regulations using a licensed waste hauler and disposal facility, after appropriately characterizing the material for collection and disposal.
	Dispose of all contaminated response material within 2 weeks of the discharge.

2.2.5 Termination 40 CFR 112.4(a)

The RC ensures that cleanup has been completed and that the contaminated area has been treated or mitigated according to the applicable regulations and state/federal cleanup action levels. The RC collaborates with the local, state and federal authorities regarding the assessment of damages.

Completed	Actions
	Ensure that all repairs to the defective equipment or flowline section have been completed.
	Review circumstances that led to the discharge and take all necessary precautions to prevent a recurrence.
	Evaluate the effectiveness of the response activities and make adjustments as necessary to response procedures and personnel training.
	Carry out personnel and contractor debriefings as necessary to emphasize prevention measures or to communicate changes in operations or response procedures.
	<p>Submit any required follow-up reports to the authorities.</p> <p>In the case where the discharge (as defined in 40 CFR 112.1(b)) was greater than 1,000 gallons or was the second discharge (as defined in 40 CFR 112.1(b)) of 42 gallons or more within any 12-month period, the RC is responsible for submitting the required information within 60 days to the EPA Regional Administrator following the procedures outlined in Appendix B.</p> <p>Within 30 days of the discharge, the RC will convene an incident critique including all appropriate persons that responded to the spill. The goal of the incident critique is to discuss lessons learned, the efficacy of the Contingency Plan and its implementation, and coordination of the plan/RC and other state and local plans.</p> <p>Within 60 days of the critique, the Contingency Plan will be updated (as needed) to incorporate the results, findings, and suggestions developed during the critique.</p>

2.3 Discharge Notification – 40 CFR 109.5(b)(2)

Instructions and phone numbers for reporting a discharge to the National Response Center and other federal, state, and local authorities are provided in Appendix B to this Plan. *Any discharge to water must be reported immediately to the National Response Center.* The Response Coordinator must ensure that details of the discharge are recorded on the Discharge Notification Form provided in Appendix B.

If the discharge qualifies under 40 CFR part 112 (see Appendix B for conditions), the RC is responsible for ensuring that all pertinent information is provided to the EPA Regional Administrator.

PART III

Response Resources and Preparedness Activities

3.1 Equipment, Supplies, Services, and Manpower - *40 CFR 109.5(c)(1) & (c)(2)*

5 - spill kits are provided to and by Miller Bros. personnel. Each response kit shall, at a minimum, contain the following equipment and material.

Quantity	Item
1	55 gallon drum
2	Granular Absorbent 20lb bag
5	10' Ultra Absorbent Boom Sock
50	Universal Mat Pads
7	Universal Absorbent Pillow
1	Safety Goggles
1	Nitrile Gloves (Box)
1	Trash Bags (Box)
2	Shovel
2	Broom

This material is sufficient to respond to most minor discharges occurring at the facility and to initially contain a major discharge while waiting for additional material or support from outside contractors. The inventory is verified on a weekly basis during the inspection by designated personnel and is replenished as needed.

40 CFR 109.5(d)(2)

SRC and Miller Bros. have employees trained and available to respond to an oil discharge. Miller Bros. personnel may be assisted by SRC employees if required and available. All employees are familiar with the facility layout, location of spill response equipment and staging areas, and response strategies, and with the SPCC and Oil Spill Contingency Plans for this facility. All have received training in the deployment of response material.

40 CFR 109.5(c)(3)

To respond to larger discharges and ensure the removal and disposal of cleanup debris, SRC has established agreements with a specialized cleanup contractor: Clean Harbors of Bristol, CT. Contact information is provided in Appendix A. These contractors have immediate access to an assortment of equipment and materials, including mechanical recovery equipment for use on water and on land, small boats, floating booms, and large waste containers. Each contractor has sufficient response equipment to contain and recover the maximum possible discharge of 6,835 gallons. Clean Harbors can respond *within 8 hours* of receiving a verbal request from the RC. SRC discusses response capacity needs on a periodic basis with each contractor to ensure that sufficient equipment and material are available to respond to a potential 6,835-gallon discharge.

3.2 Access to Receiving Waterbody - 40 CFR 109.5(d)(5)

Unnamed Creek would be the first waterbody affected in the event of a discharge. From there, the oil would flow into the Gulf Stream, and finally into the Naugatuck River. The response strategy consists of: (1) deploying booms and other response equipment at various points downstream from the oil plume to prevent its migration; and (2) deploying booms as a protective measure for an irrigation water intake and other downstream sensitive receptors.

Vehicular access to the unnamed creek is essential to ensure that the response equipment can be effectively deployed to contain oil at various points along the waterway and prevent further migration of the oil towards the Naugatuck River.

Two access points have been established along unnamed creeks and are marked on the map in Figure C-1 (BC1 and BC2). These access points provide sufficient cleared land for a staging area from which SRC, or contractor personnel can deploy response equipment, and recover and store spilled oil.

Once per month, as part of the monthly inspection of the facility, SRC facility personnel visually observe the location and make sure that it remains accessible (e.g., vegetation is not overgrown).

3.3 Communications and Control - 40 CFR 109.5(b)(3) & 40 CFR 109.5(d)(3)

A central coordination center will be set up at the field office in the event of a discharge. The field office is equipped with a variety of fixed and mobile communication equipment (telephone, fax, cell phones, two-way radios, computers) to ensure continuous communication with SRC management, responders, authorities, and other interested parties.

Communications equipment includes:

- **Cell phones.** Each field vehicle and the RC shall have a mobile phone. The RC and/or his alternate (Site Supervisor when the Field Operations Manager is not "on call") can be reached by cell phone 7 days a week, 24 hours a day.

The RC is responsible for communicating the status of the response operations and for sharing relevant information with involved parties. The Director EHS&S or his designee including local, state, and federal authorities.

In the event that local response agencies, Connecticut authorities, or a federal On-Site Coordinator (OSC) assumes Incident Command, the RC will function as the facility representative in the Unified Command structure.

3.4 Training Exercises and Updating Procedures - 40 CFR 109.5(d)(1)

SRC and its subcontractors, and Miller Bros has established and maintains an ongoing training program to ensure that personnel responding to oil discharges are properly trained and that all necessary equipment is available to them. The program includes on-the-job training on the proper deployment of response equipment and periodic practice drills during which personnel are asked to deploy equipment and material in response to a simulated discharge. The RC is responsible for implementing and evaluating preparedness training.

Following a response to an oil discharge, the RC will evaluate the actions taken and identify procedural areas where improvements are needed. The RC will conduct a briefing with field personnel, contractors, and local emergency responders to discuss lessons learned and will integrate the outcome of the discussion in subsequent SPCC briefings and employee training seminars. As necessary, the RC will amend this Contingency Plan or the SPCC Plan to reflect changes made to the facility equipment and procedures.

APPENDIX A EMERGENCY CONTACTS

40 CFR 109.5(b)(2)

Name	Title	Telephone
Dee Kohler	Project Manager Silicon Ranch Corporation	(512) 924-3595 (cell)
Jim Barfield	Director EHS&S Silicon Ranch Corporation	(704)-985-3316 (cell)
Pete LaCamera	Field Supervisor Miller Bros.	(610) 246-1267 (cell)

Local Emergency Responders

Name	Telephone	Address
Fire/Police Departments	911	
Connecticut State Police	(860) 535-1451	

Cleanup Contractors

Name	Telephone	Address
Clean Harbors	(860) 583-8917	

APPENDIX B DISCHARGE NOTIFICATION PROCEDURES

Circumstances, instructions, and phone numbers for reporting a discharge to the National Response Center and other federal, state, and local agencies, and to other affected parties, are provided below. They are also posted at the facility in the storage shed containing the discharge response equipment. Note that any discharge to water must be reported immediately to the National Response Center.

Field Operations Manager, Peter LaCamera (24 hours) (610) 246-1267

Local Emergency (fire, explosion, or other hazards) 911

Agency / Organization	Agency Contact	Circumstances	When to Notify
<i>Federal Agencies</i>			
National Response Center	1-800-424-8802	Discharge reaching navigable waters.	Immediately (verbal)
CT Division of Emergency Management and Homeland Security – Region 5	1-860-922-3727	Discharge reaching navigable waters.	Immediately (verbal)
Connecticut Department of Energy and Environmental Protection	1-866-337-7745	Discharge 1,000 gallons or more into navigable waters; or second discharge of 42 gallons or more over a 12-month period.	Written notification within 60 days (see Section 2.1 of this Plan)

The person reporting the discharge must provide the following information:

- Name, location, organization, and telephone number
- Name and address of the owner/operator
- Date and time of the incident
- Location of the incident
- Source and cause of discharge
- Types of material(s) discharged
- Total quantity of materials discharged
- Quantity discharged in harmful quantity (to navigable waters or adjoining shorelines)
- Danger or threat posed by the release or discharge
- Description of all affected media (e.g., water, soil)
- Number and types of injuries (if any) and damaged caused
- Weather conditions
- Actions used to stop, remove, and mitigate effects of the discharge
- Whether an evacuation is needed
- Name of individuals and/or organizations contacted
- Any other information that may help emergency personnel respond to the incident

Whenever the facility discharges more than 1,000 gallons of oil in a single event, or discharges more than 42 gallons of oil in each of two discharge incidents within a 12-month period, the Manager of Field Operations must provide the following information to the U.S. Environmental Protection Agency's Regional Administrator within 60 days:

- Name of the facility
- Name of the owner or operator
- Location of the facility
- Maximum storage or handling capacity and normal daily throughput
- Corrective actions and countermeasures taken, including a description of equipment repairs and replacements
- Description of facility, including maps, flow diagrams, and topographical maps
- Cause of the discharge(s) to navigable waters, including a failure analysis of the system and subsystems in which the failure occurred.
- Additional preventive measures taken or contemplated to minimize possibility of recurrence
- Other pertinent information requested by the Regional Administrator.

Discharge Notification Form

*** Notification must not be delayed if information or individuals are not available. Additional pages may be attached to supplement information contained in the form.

Facility: Litchfield Solar Facility
298 Rossi Road
Torrington, CT 06790

Description of Discharge		
Date/time	Release date: Release time: Duration:	Discovery date: Discovery time:
Reporting Individual	Name:	Tel. #:
Location of discharge	Latitude: Longitude:	Description:
Equipment source	<input type="checkbox"/> Fuel Storage Tank <input type="checkbox"/> Pad Mounted Transformer <input type="checkbox"/> Mobile and Heavy Equip.	Description: Equipment ID:
Product	<input type="checkbox"/> Diesel <input type="checkbox"/> Gasoline <input type="checkbox"/> Mineral Oil <input type="checkbox"/> FR3 Oil	* Describe other:
Appearance and description		
Environmental conditions	Wind direction: Wind speed:	Rainfall: Current:
Impacts		
Quantity	Released:	Recovered:
Receiving medium	<input type="checkbox"/> water** <input type="checkbox"/> land <input type="checkbox"/> other (describe):	<input type="checkbox"/> Release confined to company property. <input type="checkbox"/> Release outside company property. ** If water, indicate extent and body of water:
Describe circumstances of the release		
Assessment of impacts and remedial actions		
Disposal method for recovered material		
Action taken to prevent incident from reoccurring		



Safety issues	<input type="checkbox"/> Injuries <input type="checkbox"/> Fatalities <input type="checkbox"/> Evacuation	
Notifications		
Agency	Name	Date/time reported & Comments
Company Spill Response Coordinator		
National Response Center 1-800-424-8802		
State police		
Local Emergency Response Commission		
Cleanup contractor		

Appendix C

SITE PLAN AND FACILITY DIAGRAM

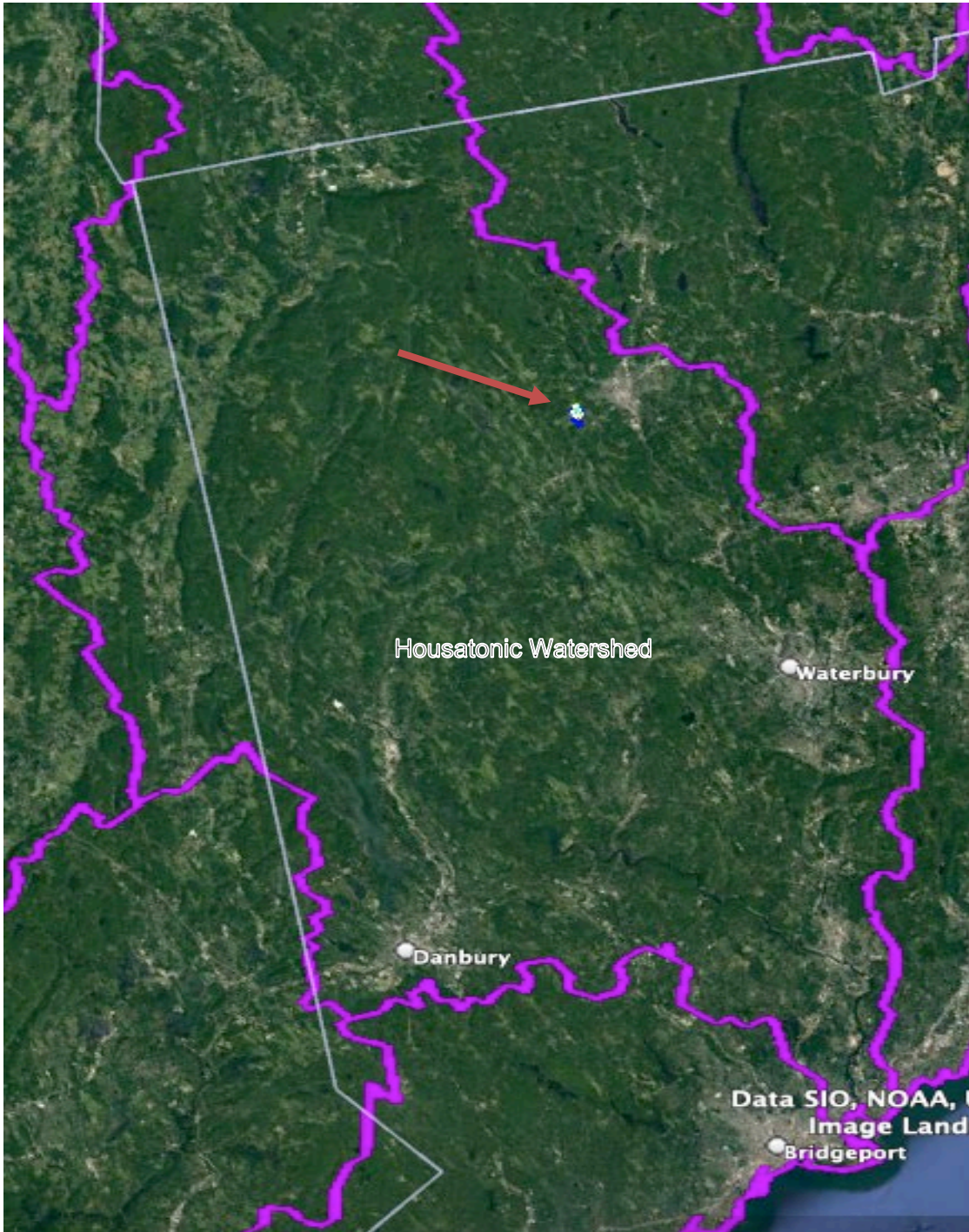


Figure C-1: Site location within the watershed

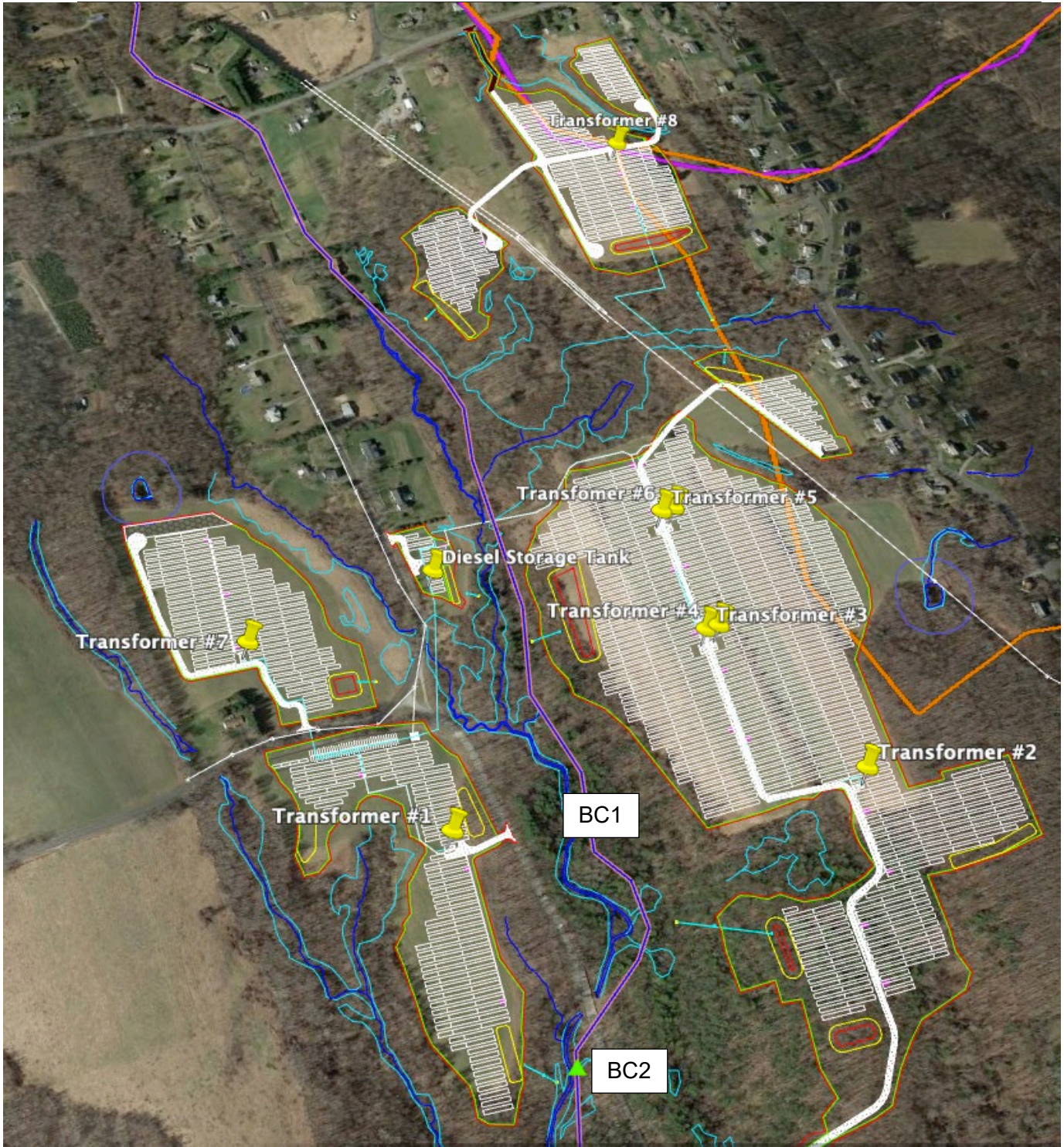


Figure C-2: Site plan



*Silicon Ranch Corporation
Litchfield Solar Facility*

Oil Spill Contingency Plan

Staging area	Location	Contact Information
BC1	On property	
BC2	On property	

SR Litchfield, LLC

PETROLEUM AND HAZARDOUS MATERIALS STORAGE, REFUELING, AND SPILL PREVENTION PROCEDURES

Certain precautions are necessary to store petroleum materials, refuel and contain and properly clean up any inadvertent fuel or petroleum (i.e., oil, hydraulic fluid, etc.) spill due to the project's location in proximity to sensitive wetland resources.

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

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

- i. Petroleum and Hazardous Materials Storage and Refueling
 1. An impervious liner will be placed directly under all vehicles and machinery during refueling activities.
 2. Any refueling drums/tanks or hazardous materials that must be kept on site shall be stored on an impervious surface a minimum of 115 feet from wetlands or watercourses.
- ii. Initial Spill Response Procedures
 1. Stop operations and shut off equipment.
 2. Remove any sources of spark or flame.
 3. Contain the source of the spill.
 4. Determine the approximate volume of the spill.
 5. Identify the location of natural flow paths to prevent the release of the spill to sensitive nearby waterways or wetlands.
 6. Ensure that fellow workers are notified of the spill.
- iii. Spill Clean Up & Containment
 1. Obtain spill response materials from the on-site spill response kit. Place absorbent materials directly on the release area.
 2. Limit the spread of the spill by placing absorbent materials around the perimeter of the spill.
 3. Isolate and eliminate the spill source.
 4. Contact the appropriate local, state and/or federal agencies, as necessary.
 5. Contact a disposal company to properly dispose of contaminated materials.
- iv. Reporting
 1. Complete an incident report.
 2. Timely submit a completed incident report to local, state and federal agencies, as/if required.

Emergency Contact Information

SITE CONTACTS	EMERGENCY SERVICES CONTACTS
<p>Project Owner: SR Litchfield, LLC Phone: 512-924-3595</p>	<p>Torrington Fire Department: Phone (non-emergency): (860)-489-2255 Litchfield Fire Department: Phone (non-emergency): (860)- 567-0147 Phone (emergency): 911</p>
<p>Project Site Contact: Miller Brothers Name: Peter Lacamera Phone: 610-246-1267</p>	<p>Litchfield Police Department: Phone (non-emergency): (860) 567-8596 Torrington Police Department: Phone (non-emergency): (860)-489-2000 Phone (emergency): 911</p>
<p>Construction Oversight Contact: SR Litchfield, LLC Name: Dee Koehler, SR Litchfield, LLC Phone: 512-924-3595</p>	<p>State Agency: Connecticut Department of Energy & Environmental Protection (DEEP), Emergency Response Unit Phone: (860) 424-3338 Alternate Phone: (860) 424-3333</p>