

Soil Management Plan

Collins Aerospace, Windsor Locks, Connecticut

PREPARED FOR

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PREPARED BY



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November 1, 2022

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Introduction

VHB was retained by Earthlight Technologies (the “Client”) to prepare a Soil Management Plan (SMP) to provide recommendations to be followed during the construction of the solar electric generating facility located at 1 Hamilton Road (Collins Aerospace) in Windsor Locks, Connecticut, hereinafter referred to as the Site (**Figure 1**). The Site is comprised of approximately 8-acres of the ±257-acre parent parcel and exists today as pavement and woodlands (**Figure 2**).

1.1 Objectives

VHB understands the purpose of this SMP is to:

- › Define the program for handling, segregating, stockpiling, sampling and reusing or disposing of soil/material encountered during upcoming regrading and construction activities; and
- › Limit exposures during construction from agricultural chemical residues that may exist in the soil; and
- › Provide guidance for spill prevention, control, and countermeasures.

The information presented in this Plan provides procedures/requirements for materials management during the project construction based on the current understanding of the Site and project parameters. The specific details and logistics for implementation of the SMP shall be the responsibility of the Contractor.

1.2 Project Contact Information

| | |
|--|--|
| Operator | Collins Aerospace 1 Hamilton Road Connecticut 06096 (860) 654-6000 |
| Civil Engineer & Environmental Consultant | VHB 100 Great Meadow Road, Suite 200 Wethersfield, Connecticut 06109 860-807-4375 |
| Construction | TBD |

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Soil Management

The Site work associated with this project will require earthwork activities, including but not limited to the following:

- › Installation of erosion and sedimentation controls;
- › Excavation, grading, and stockpiling of soils; and
- › Installation of utilities and drainage features.

Soil and erosion control requirements for soils must comply with the CTDEEP General Permit for the Discharge of Stormwater and Dewatering Wastewaters from Construction Activities. Based on the size of the proposed site disturbance area (>1 acres for a "locally exempt" project), registration under the permit will be required. A Stormwater Pollution Control Plan (SWPCP) has been developed by VHB and will be implemented for the project. The Contractor must adhere to the SWPCP and follow the Connecticut Guidelines for Soil Erosion and Sediment Control and the Connecticut Stormwater Quality Manual.

2.1 Potential Construction Site Pollutants

This section includes construction worker safety procedures to limit contact with soil, incorporate dust suppression measures and provisions for soil anti-tracking pads and construction equipment cleaning prior to exiting the Site.

Analytical data is not available for Site soils; however, there is the potential for impacted soils to be present at the Site since the Site was historically utilized as a farm. The following potential contaminants may be encountered at the Site during construction:

- › Agricultural chemical residue associated with normal agricultural practices;
- › Farm dump or buried debris; and
- › Other suspect or impacted materials.

If suspect materials, visually stained soils, or chemical odors are encountered during excavation activities, the Contractor will immediately notify VHB and the Operator.

2.2 Construction Controls

2.2.1 Dust Controls

The Contractor shall employ dust control measures necessary to minimize the creation of airborne fugitive dust from soils during performance of this work. Such measures shall include the containment of soils through implementation of soil transfer and stockpile best management practices and other

suitable methods (i.e., wetting and covering stockpile/trucks) to limit dust, as necessary. Should visible dust be generated from site operation, additional wetting shall be implemented.

2.2.2 Vapor and Odor Control

Contaminant vapors at significant concentrations that might require respiratory protection for Site workers are not anticipated during the project. VHB should be notified in the event excavation or other Site activities encounter unanticipated contaminant vapors or odors. The Contractor shall be prepared to employ control measures necessary to minimize the generation of such contaminant vapors and odors. Such measures may include: restricting work in a particular area, use of temporary mats or coverings, containment of a particular work area, and other feasible means of controlling contaminant vapors and odors, as necessary, including remediation.

2.2.3 Soil Stockpiling

Soils to be stockpiled may include the following:

- › Soils from grading or excavations to be reused on-site
- › Excess soils from grading or excavations for off-site disposal
- › Potentially contaminated soils (see Section 2.1) for off-site disposal

For soils generated from grading or excavations (either for on-site reuse or for off-site disposal), the stockpile areas shall be graded such that stormwater run-on and runoff is diverted around the stockpiled materials. At a minimum, a snow-fence and haybales with silt fence shall be placed continuously around the perimeter of each stockpile area. In the event excavated materials are excessively wet (saturated), earth berms shall be placed around the perimeter of the stockpile area, if necessary, to contain drainage from the stockpiles. Stockpile side slopes shall be no steeper than 3 horizontal to 1 vertical. Drainage effluent from the stockpiles shall be contained within perimeter berms and infiltrated.

In addition to the stockpile requirements outlined above, potentially contaminated soils shall be placed within a separate, designated stockpile area, graded to shed water, underlain with a minimum ten (10)-mil-thick polyethylene sheeting, and covered prior to inclement weather and at the end of each workday with a minimum ten (10)-mil-thick polyethylene cover overlapped and weighted to form a continuous waterproof barrier over the material. The cover shall be maintained throughout the stockpile period to prevent water from entering the stockpiled materials and to prevent blowing dust. Stockpile locations shall be placed as approved by the Operator and VHB in advance of construction.

In the event of potentially-contaminated soil being discovered, sampling of either excess soils for off-site disposal or potentially-contaminated soil stockpiles can be completed by VHB. This effort will require VHB to collect representative samples of the soils once the soils have been stockpiled by the Contractor. Representative soil samples will be submitted for analysis by an analytical laboratory licensed in Connecticut.

The results of the stockpile sampling will be provided to the Contractor to evaluate potential off-site disposal, off-site reuse options, and/or potential on-Site reuse. The Contractor will coordinate with VHB to complete any additional required waste characterization, identify appropriate off-Site disposal facilities for impacted soils, and arrange for loading, transport, and disposal of impacted soils. The

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Owner will sign all transportation and disposal documents (Material Shipping Records or Bills of Lading) as the Generator. The Contractor shall provide copies of soil disposal weight tickets, manifests or Bills of Lading, and disposal facility acceptance letters to the Owner.

2.3 Equipment Decontamination

In the event contaminated soil is encountered at the Site, the Contractor is responsible to decontaminate all tools and equipment used during excavation, stockpiling and any re-handling of impacted soil before they are taken from the Site. This includes hand tools, machinery, and hauling equipment.

2.4 Spill Prevention and Control

The Contractor is responsible for containing and properly cleaning up any inadvertent fuel or petroleum spill, as well as keeping and maintaining a spill containment kit on Site for the duration of construction. The spill containment kit shall consist of a sufficient supply of absorbent pads and absorbent material. In addition, a waste drum shall 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 Contractor shall provide training to all employees performing work on Site. CTDEEP Emergency Response Unit shall be contacted at (860) 424-3338 in the event of an emergency spill as well as local emergency response units if/as needed.

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Groundwater Management

Groundwater dewatering is anticipated for this construction effort. Dewatering activities must comply with the CTDEEP General Permit for the Discharge of Stormwater and Dewatering Wastewaters from Construction Activities prepared by VHB. Notwithstanding the requirements of this General Permit, treatment of impacted groundwater is not anticipated for this construction effort.

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Health and Safety

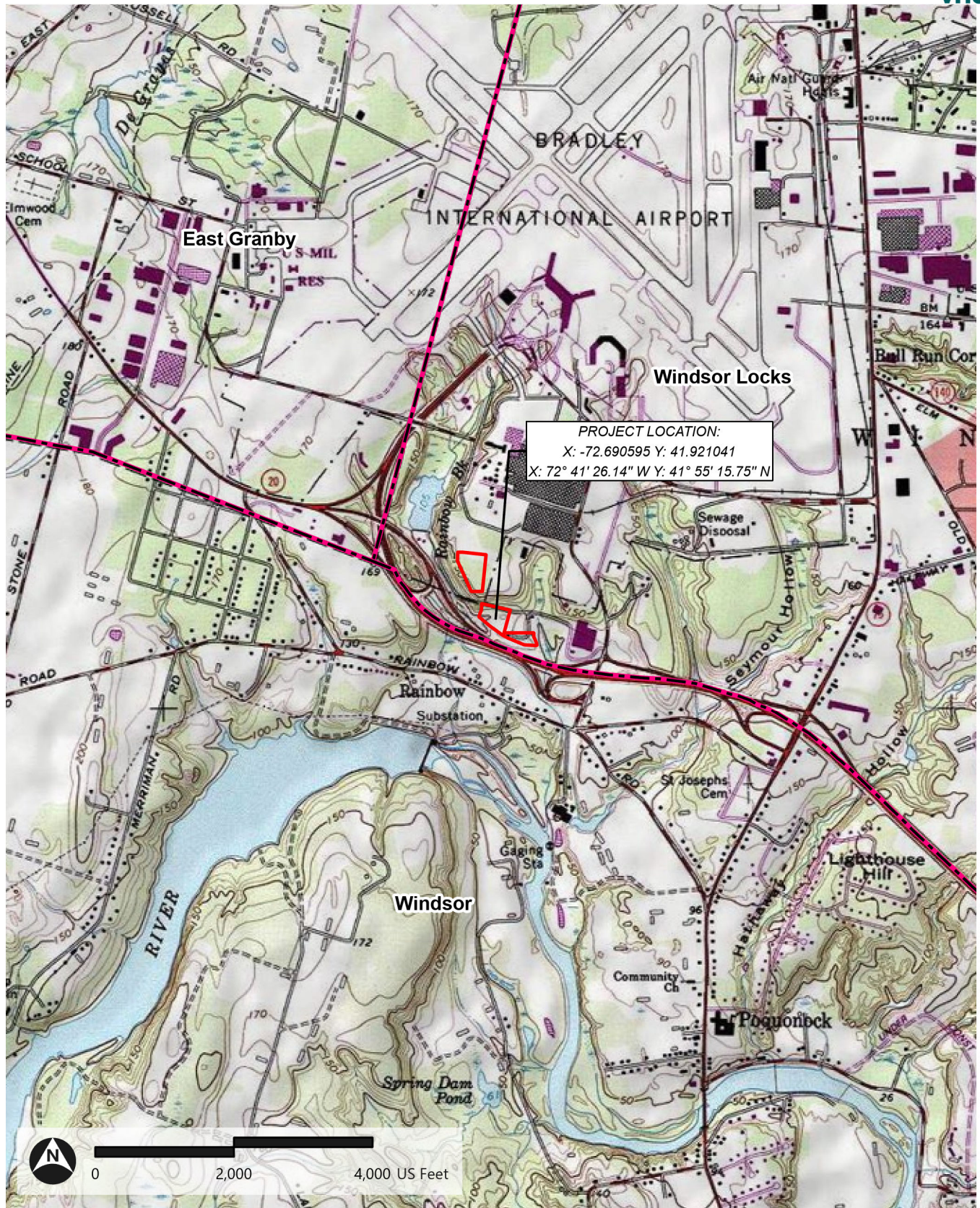
The Contractor and any subcontractors performing work within the contract limits shall have a Site-specific written health and safety plan (HASP) developed by a qualified person designated by the Contractor in accordance with 29 CFR 1910.120 and 29 CFR 1926.65. The Contractor shall establish protocols and provide procedures to protect worker's health and safety as it relates to the proposed construction activities when performed in the presence of contaminated materials or otherwise environmentally sensitive conditions. The HASP shall be developed and implemented to address the relative risk of exposure to documented Site hazards present within the contract limits.

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Figures

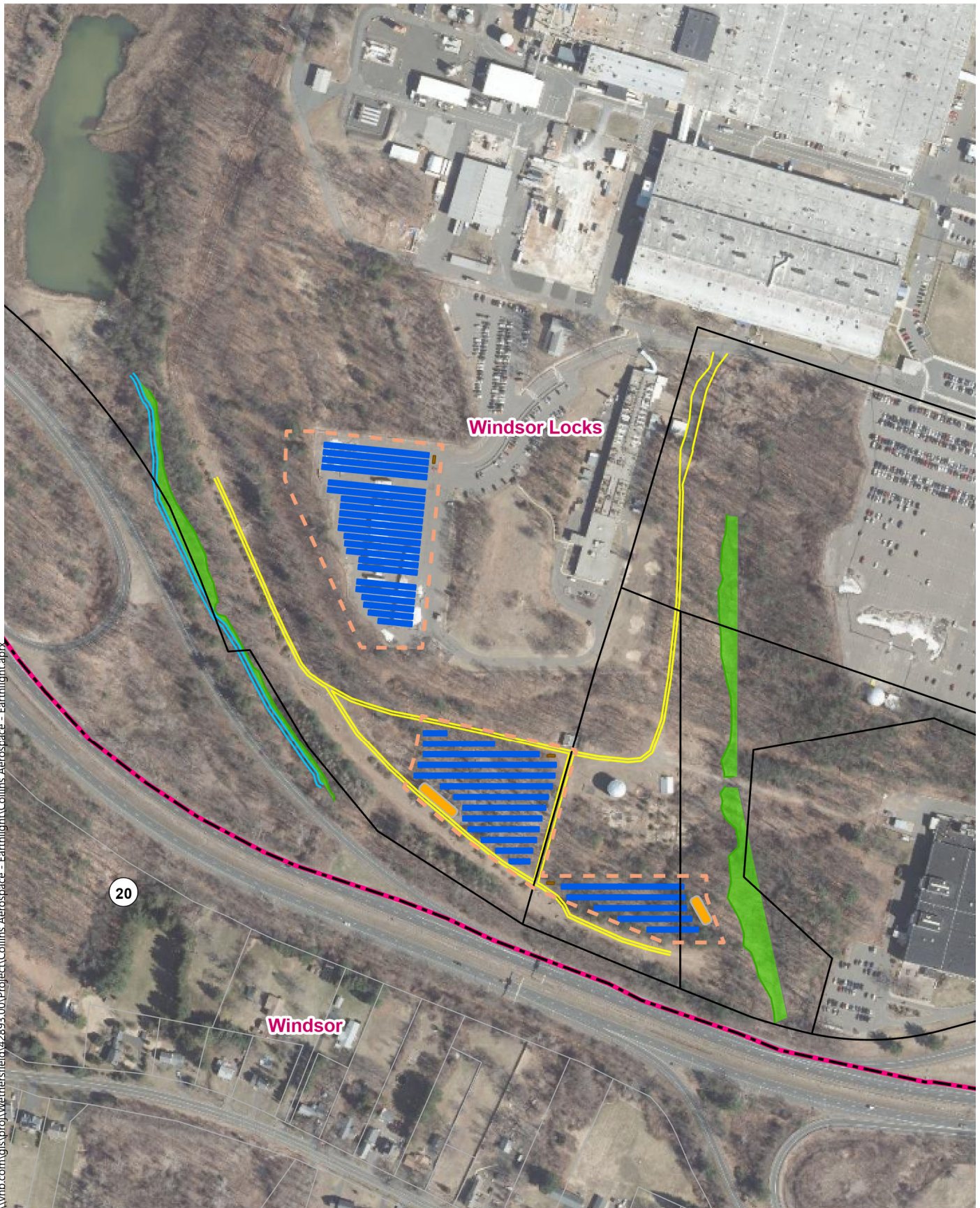
Figure 1: USGS Site Location Map

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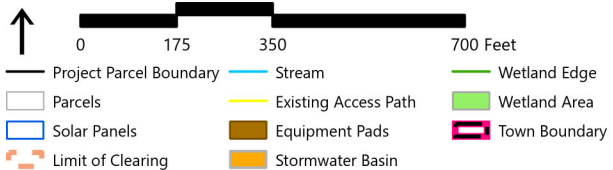


Project Area Town Boundary

Path: \\vhb.com\gis\proj\Wethersfield\42893.00\Project\Collins Aerospace - Earthlight\Collins Aerospace - Earthlight.aprx (kfranch, 11/7/2022)



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Proposed Project Layout

Source: VHB, CTDEEP, ESRI