

Exhibit L

Soil Management Plan

Exhibit M

Soil Material Management Plan

This Soil Management Plan (SMP) should be used prior to significant potential soil disturbing activities at 179 and 197 Borrelli Road (Site), such as project related excavation, major maintenance, project decommissioning, etc. The following soil management procedures should be followed by Site contractors in the event that soil is removed, stockpiled, stored, or transported offsite for disposal.

General Requirements

- Prior to soil disturbing activities, soil in the area of disturbance should be characterized. Connecticut's solid and hazardous waste management regulations, the Resource Conservation and Recovery Act (RCRA), and other applicable waste management regulations have requirements and procedures for handling of impacted soil and any other solid waste which may be unearthed. All soils and solid waste should be adequately characterized to ensure proper management and disposal using standard state or United States Environmental Protection Agency (USEPA) testing methods. If soil results reveal constituents of concern exceeding appropriate state remedial action criteria, contractor will immediately notify owner. Contractor will share all plans and results with owner.
- The contractor must minimize the generation of waste material during on-Site activities consistent with state law. Where possible, the contractor must recycle solid soil waste materials for reuse on-Site or transported to an appropriate recycle center. Hazardous waste materials must be recycled or processed at the appropriate facilities. The contractor must make necessary efforts to reduce waste source and overall amount of waste generated.
- Profiling of soil and other solid waste (not deemed inert) for disposal at an off-site facility is necessary to determine proper disposal methods and verify that the soils and/or solids meet all acceptance criteria of the disposal facility, and ensure compliance with all federal, state, and local regulations. Characterization information will be documented on a waste profile form provided by the off-site facility. Only Client-approved personnel may sign waste profile and manifests documents on behalf of the Client as generator.
- All regulated soils and non-inert solids that will be transported off-site must be adequately characterized and disposed of at a facility that is permitted to receive the soil. The contractor is responsible for identifying, proposing, and securing disposal facility authorization. However, prior to any off-site transportation of regulated soils and solid waste, the contractor shall present the name, location, permit type/status, and point of contact for the proposed disposal facility to the owner/owner's representative for review and approval. The owner reserves the right to reject a proposed disposal facility.
- All transport of regulated soil and solid waste will be performed by licensed and permitted haulers owner approval and in accordance with appropriate local, state and federal

regulations. Loaded vehicles leaving the Site will be appropriately lined, securely covered, cleaned, manifested and placarded in accordance with appropriate local, state and federal requirements including United States Department of Transportation (DOT).

- Construction workers may disturb the subsurface through digging, trenching, excavation, or loading and therefore may be potentially exposed to hazardous constituents. During construction activities, workers who may directly contact impacted soil will conduct the work in accordance with Occupational Safety and Health Administration (OSHA) training and worker protection rules and regulations. Construction workers or other workers involved in activities that disrupt soil may encounter previously unknown materials or areas of affected soil. Workers must be supplied with and wear any PPE deemed necessary to assure their protection.
- If soil stockpiles are created during activities, they must be managed in accordance with the project Stormwater Pollution Prevention Plan (SWPPP) and any applicable state or local requirements. Sediment control best management practices (BMPs) such as silt fencing will be installed to prevent sediment runoff.