

ATTACHMENT C

Draft Spill Prevention, Control, and Countermeasure (SPCC) Plan

West Haven Energy Center, LLC BESS

337 Elm St

West Haven, Connecticut

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Introduction

This Draft Spill Prevention, Control, and Countermeasure (SPCC) Plan outlines the preliminary scope of work to prevent, respond and report oil spills and releases into the environment during construction. This draft plan was developed for the construction of a ± 15 MW battery energy storage facility located at 337 Elm St in West Haven, CT.

It is recommended that a final site-specific plan be developed by the selected EPC or general contractor prior to construction.

This Draft SPCC Plan addresses the requirements of the EPA regulations specified in Title 40 of the Code of Federal Regulations (CFR). These regulations codified in 40 CFR Part 112 establish the procedures, methods, and equipment to prevent discharge of oil (i.e., petroleum oil and non-petroleum products) from non-transportation related onshore and offshore facilities into or upon the navigable waters of the United States or adjoining shorelines.

SPCC plans for facilities are prepared and implemented as required by the U.S Environmental Protection Agency (EPA) Regulation 40 CFR 112. A non-transportation-related facility is subject to SPCC regulations if:

- The facilities total aboveground storage capacity exceeds 1,320 gallons; or
- The facilities total underground storage tank capacity exceeds 42,000 gallons; and
- If, due to its location, the facility could reasonably be expected to discharge oil into or upon the navigable waters or adjoining shorelines of the United States

For this project, the proposed aboveground oil storage capacity is anticipated to exceed 1,320 gallons. Each transformer holds approximately 695 gallons of vegetable-based dielectric oil. The oil is readily biodegradable with over 99% biodegradation within 28 days. If State, Local or Federal regulations require secondary containment the MV transformers will be outfitted with the necessary containment built into the equipment skid. There is no proposed underground storage tank, and the facility is not expected to discharge oil into waters. A copy of the SPCC will be available for on-site review during normal working hours.

Pollution Prevention Standards

Potential Construction Site Pollutants

Pollutant-Generating Activity	Pollutants or Pollutant Constituents	Locations on Site
Equipment Re-fueling	Diesel Fuel, Gasoline	Staging Area
Leaking or Broken Hydraulic Lines	Hydraulic Oil	Construction Work Areas

Minor Equipment Maintenance	Diesel Fuel, Gasoline, Hydraulic Oil, Motor Oil, Coolant	Staging Area
Vehicle Accident	Diesel Fuel, Gasoline	Entire Site

The contractor shall adhere to the following spill response and material handling procedures:

Refueling and Material Storage

All light duty construction support vehicles shall be fueled off site at a service station.
 Refueling of vehicles on site shall take place in a supervised manner to avoid any overfills.
 Refueling of vehicles or machinery shall take place on an impervious pad with secondary containment designed to contain petroleum fuel.
 Any refueling tanks and/or drums or other hazardous materials that must be kept on site shall be stored on an impervious surface utilizing secondary containment and be kept at least 100 feet from any wetlands or watercourses located on site.

Initial Spill Response Procedure

Immediately stop operation and shut off all equipment.
 Remove any sources of ignition.
 Locate the source of the spill and contain and/or stop the spill from continuing.
 Once the spill is stopped or contained, follow any flow paths of the spill and prevent or contain any further release into sensitive environmental areas.
 Ensure that all contractors and subcontractors on site are notified of the spill.

Spill Clean Up

Obtain the Spill Response Kit from the designated location on site.
 Place the absorbent materials directly on the spill.
 Continue to place absorbent materials around the spill to prevent any further release.
 Ensure that the spill is eliminated or isolated at the source.
 Determine the type and approximate amount of material that was spilled.
 Contact the appropriate Site contacts and local, state and/or federal agencies as required.
 Contact a disposal company to properly dispose of any contaminated materials.
 File a report on the incident.

Reporting

Complete an incident report for each spill.
 Submit a completed report to local, state and federal agencies, as required.
 The Connecticut Department of Energy & Environmental Protection (DEEP), Emergency Response Unit should be contacted at: (860 424-3338, in the event of an emergency spill.

Site and Emergency Contact Information

Spill Coordinator

Name: TBD

Phone: TBD

Email: TBD

Connecticut DEEP (Spill Reporting Line, Emergency Response Unit)

Phone: 860-424-3338 or toll free at 1-866-337-7745 (24 Hr Line)

Local Emergency Contacts

Emergency - Dial 911

Fire Department:

Phone: 203.937.3710

Address: 336 Elm St, West Haven, CT 06516

Police Department:

Phone: 203.937.3900

Address: 200 Sawmill Rd, West Haven, CT 06516

Emergency Response Contractor

Name: TBD

Phone: TBD

Address: TBD

Subcontractor Certifications/Agreement

Project Number: _____

Project Title: _____

Operators: _____

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

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

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

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

Company: _____

Address: _____

Telephone Number: _____

Type of Construction Service to be Provided: _____

Signature: _____

Title: _____

Date: _____

Company: _____

Address: _____

Telephone Number: _____

Type of Construction Service to be Provided: _____

Signature: _____

Title: _____

Date: _____

Reporting and Record Keeping

Date	Description of Activity when Spill was Discovered	Description of Remediation Measure and Location, Contacts Made, and CT DEEP Spill Notification Number	Follow Up Actions and Resolution/Remediation Details