Exhibit R Spill Prevention Plan

Exhibit R Spill Prevention and Response Plan

Solar Project - 2 MW and 700 kW Ground-Mounted Solar Photovoltaic (PV) Facility

Location: 121 W Pond Road, North Branford, CT

Date: April 9, 2025

1. Purpose

This Spill Prevention and Response Plan outlines procedures to prevent, control, and respond to potential spills of hazardous materials, such as fuel, oil, and other chemicals, that may be used or stored during construction, operation, or maintenance of the solar PV facility.

2. Applicability

This plan applies to all personnel, contractors, and subcontractors involved in construction and operation of the facility. While the project is not expected to store any petroleum products, limited use of lubricants, hydraulic fluids, and fuels may occur during construction and maintenance activities.

3. Spill Prevention Measures

3.1. Materials Storage

- Hazardous materials (e.g., fuel, oil, lubricants) will be stored in labeled containers with secondary containment (e.g., spill pallets or containment berms).
- No bulk fuel storage is anticipated. If temporary storage is needed during construction, it will not exceed 1,320 gallons onsite at any one time without additional SPCC compliance.
- All containers must be kept in good condition and closed when not in use.

3.2. Equipment Maintenance

- Construction and maintenance vehicles must be inspected daily for leaks.
- Preventative maintenance will be performed to reduce the risk of spills from equipment failure.
- Refueling and fluid changes will occur away from sensitive areas, using drip pans or absorbents to capture drips/spills.

3.3. Stormwater Protection

- Materials will be stored away from stormwater conveyances.
- Spill containment measures will be implemented in accordance with the project's Stormwater Pollution Prevention Plan (SWPPP).

4. Spill Response Procedures

4.1. Discovery of a Spill

- Any observed spill must be immediately reported to the Site Supervisor.
- The area should be secured to prevent further contamination or spread.

4.2. Response Actions

- Use appropriate personal protective equipment (PPE).
- Stop the source of the spill, if safe to do so.
- Contain the spill using absorbents, booms, or other available containment methods.
- Collect and properly dispose of all contaminated materials.
- Notify appropriate regulatory agencies if the spill exceeds reportable quantities.

4.3. Notifications

- Site Supervisor: [TBD]
- CT DEEP Emergency Response and Spill Prevention Division:

24-Hour Emergency Number: 1-866-337-7745

- National Response Center (NRC): 1-800-424-8802 (if federally reportable)
- Record the incident and corrective actions in the project's Environmental Log.

5. Training and Inspections

5.1. Training

- All personnel will receive training on spill prevention and response procedures prior to beginning work onsite.
- Refresher training will occur annually and/or following any incident.

5.2. Inspections

- Weekly site inspections during construction to check for proper storage, signs of leaks, and availability of spill kits.
- Monthly inspections during operations.

6. Spill Kits

Spill response kits will be available on-site at all times and include:

- Absorbent pads and booms
- Protective gloves and goggles
- Disposal bags
- Emergency contact list
- Instructions for spill containment and reporting

7. Recordkeeping

Records of inspections, training, spill incidents, and corrective actions will be maintained onsite for a minimum of 3 years and made available to the Connecticut Siting Council or CT DEEP upon request.