Site-Specific Fuel Storage and Spill Prevention Control Plan

Construction and operation plan for the proposed Tesla Megapack project at Guilford High School

Project	**SMS CT MG02A, LLC - 1.93 MW AC Battery Energy Storage Facility (Tesla Megapack 2 XL)**
Location	Guilford High School, 605 New England Road, Guilford, Connecticut
Prepared for	Use as a draft attachment/response to Connecticut Siting Council Petition No. 1699, Interrogatory No. 44
Prepared by	Drafted for project team use; finalize with Lantern Electrical, owner, counsel, spill cleanup contractor, and LEP information before filing
Purpose	Fuel storage controls, spill prevention, response, reporting, training, and contact information for construction and operations
Version	Draft Rev. 0 - March 12, 2026

This draft assumes no dedicated on-site bulk fuel storage during operations and no temporary bulk fuel tank during construction unless separately approved and added to this plan.

Filing notes and completion checklist

> **What the Council asked for:** On March 11, 2026, the Connecticut Siting Council asked SMS to submit a site-specific Fuel Storage and Spill Prevention Control Plan for site construction and operation with worker training and contact information, including regulatory agencies, spill cleanup contractors, and emergency responders. This draft is structured to satisfy that request and can be used as an attachment to the interrogatory response once the project-specific blanks are confirmed.

Item to confirm before filing	Current draft status	Action owner
Lantern Electrical project manager, superintendent, Spill Coordinator, and alternate contact details	Project-specific names not yet inserted	Lantern Electrical
Spill cleanup contractor and 24/7 dispatch number; Connecticut LEP/PEP support contact	Required for final filing	Owner
Whether any temporary AST, fuel cube, generator, or tote 55 gallons or larger will be used during construction	Assumed no unless approved	Lantern Electrical
Final designated fueling / service area shown on site sketch with nearest drains and spill kit locations	Needs final site markup	Civil / field superintendent
Final OEM / utility quantities for Megapack coolant, refrigerant, and transformer insulating oil (if applicable)	Draft uses current project assumptions	Owner
Review with school facilities staff and Guilford Fire Department before mobilization and again before operation	Recommended	Owner / Lantern / AHJ

1. Purpose, scope, and plan basis

This Plan establishes project-specific requirements for fuel storage, spill prevention, incident response, reporting, training, inspections, and documentation for both construction and normal operation of the proposed battery energy storage facility at Guilford High School. It is intended to be practical for field use and suitable for filing as a supporting attachment to the Connecticut Siting Council record.

This Plan supplements, but does not replace, the project Emergency Response Plan, contractor health and safety plans, OEM instructions, utility requirements, local fire department incident command procedures, or any code-required fire protection submittals. If construction means and methods change materially, this Plan shall be revised before the change is implemented.

2. Site-specific project summary

Facility	**Proposed 1.93 MW AC battery energy storage facility with one Tesla Megapack 2 XL and associated equipment**
Project site	Approx. 2,020 square feet at the northeastern edge of Guilford High School in a developed lawn / campus setting
Nearest residence	Approx. 153 feet east of the site

Facility	**Proposed 1.93 MW AC battery energy storage facility with one Tesla Megapack 2 XL and associated equipment**
Surface water / wetlands context	No watercourses, wetland features, or hydric soils at or near the site; closest wetland approx. 800 feet southeast; Spinning Mill Brook approx. 1,900 feet from the project disturbance limit
Groundwater / aquifer context	Groundwater classification GA; site not in a mapped CT DEEP Aquifer Protection Area
Flooding	FEMA Zone X (minimal flood risk)
Construction stormwater context	Project area is less than one acre; petition states the CT DEEP General Permit for Discharge of Stormwater and Dewatering Wastewaters for Construction Activities is not required; erosion and sediment controls still apply

Site-specific operating assumption: The project Emergency Response Plan states that no hazardous liquids are stored on-site during normal operation, although minor releases of coolant or oil can occur during maintenance. For this draft, routine operation is therefore treated as a no-bulk-fuel-storage site, with spill planning focused on enclosed equipment liquids, maintenance activities, utility transformer oil if applicable, and potential firewater runoff management.

3. Regulatory and permitting framework

This Plan is built around four practical compliance layers:

- Connecticut Siting Council Interrogatory No. 44, which specifically asks for a site-specific Fuel Storage and Spill Prevention Control Plan for construction and operation with worker training and contact information.
- Connecticut spill reporting requirements under CGS 22a-450 and RCSA 22a-450-1 through 22a-450-6, including immediate reporting to DEEP for specified oil, petroleum, and other reportable material releases.
- Connecticut cleanup requirements under CGS 22a-454 and related DEEP permitting, which require reportable spill cleanup to be performed by appropriately permitted contractors and, for significant releases, under qualified environmental oversight.
- Federal SPCC applicability under 40 CFR Part 112, which must be re-evaluated if bulk oil storage at the site changes.

Topic	Project-specific application
Current draft assumption	No dedicated bulk fuel tank is planned on-site for normal operation. Construction fuel is expected to remain in mobile equipment, approved service vehicles, and small containers unless a temporary tank is specifically approved.
Federal SPCC trigger to re-check	Reevaluate if aboveground oil containers 55 gallons or larger at the site, excluding motive power containers, could reasonably discharge to waters and collectively exceed 1,320 gallons.

Topic	Project-specific application
Plan revision trigger	Issue an addendum before delivery of any temporary AST, fuel cube, oil-filled generator, or other new storage container that changes the assumptions above.

4. Roles and responsibilities

Role	Minimum responsibility	Project-specific name / contact
Owner / operator representative	Approves resources, receives incident notifications, coordinates with counsel and project stakeholders.	Scale / SMS representative
Construction Spill Coordinator	Primary field authority for fuel handling controls, spill kit readiness, initial response, and notifications during construction.	Lantern Electrical superintendent or SSHO – Brandon Hicks
Alternate Spill Coordinator	Acts when primary is unavailable; maintains inspection and training records.	Lantern Electrical - Jeff Wirta
Authorized fueling / service personnel	Performs attended fueling, uses drip pans and absorbents, protects drains, reports leaks immediately.	TBD
Operations / maintenance lead	Implements operational inspections, coordinates OEM service, and manages any maintenance-related leak or spill response.	PurePoint Energy LLC
All workers / subcontractors	Stop work when a release occurs, protect life safety first, report immediately, and do not exceed training limits.	Applies to all site personnel.

5. Materials and fuel inventory

The inventory below is intentionally conservative. It distinguishes between routine operational liquids enclosed within equipment and construction-phase fuels that may be present only in equipment or service vehicles. The table should be updated if the final construction means and methods change.

Phase	Material / source	Storage / exposure condition	Estimated quantity	Control approach
Construction	Diesel in construction equipment and approved fuel/service truck	Motive tanks / mobile fueling only unless temporary AST is separately approved	Variable; no dedicated bulk tank assumed in this draft	Attended fueling, drip pans, spill kits, drain protection, daily leak inspection

Phase	Material / source	Storage / exposure condition	Estimated quantity	Control approach
Construction	Gasoline for small tools, if used	Safety cans or approved small containers only	Project-specific; minimize quantity	Keep closed, secured, away from ignition sources; remove unused fuel daily where practicable
Construction	Hydraulic oil, lubricants, grease, coolant in equipment	Contained within equipment; small service containers only	Incidental to equipment fleet	Inspect equipment daily; remove leaking equipment from service
Operation	Megapack coolant (50/50 water / ethylene glycol solution)	Closed-loop equipment system	Confirm final OEM quantity before filing / energization	No bulk storage; isolate leaks; OEM-qualified maintenance; spill contractor if beyond defensive capability
Operation	Megapack refrigerant (project ERP references R-134a)	Sealed thermal management system	Confirm final OEM quantity before filing / energization	Isolate area; qualified technicians only; treat visible release as a hazardous materials event if needed
Operation	Utility / pad-mounted transformer insulating oil, if applicable	Contained within transformer	Confirm utility transformer type and oil volume	Inspect for staining / leaks; protect downgradient drains during maintenance; coordinate with utility

Phase	Material / source	Storage / exposure condition	Estimated quantity	Control approach
Operation	Battery cell electrolyte	Sealed within cells and not intended for field handling under normal operations	Not routinely handled on-site	Do not open battery enclosure except by qualified personnel; emergency response per ERP / Tesla guidance

Construction tank rule: If a temporary fuel cube, portable AST, or generator with oil storage 55 gallons or larger will be brought to the site, the project team should update this inventory, show the exact location on a site sketch, verify secondary containment sizing, and reassess federal SPCC applicability before delivery.

6. Construction-phase prevention and control requirements

- No dedicated on-site bulk fuel storage is authorized by this draft unless the location, tank size, containment, and contacts are added to this Plan before delivery.
- All construction fueling shall occur only within a designated controlled area or by mobile fueling within the secured work zone. Because this is an active school campus, fueling and service activities shall be kept away from public/student access and separated by construction fencing, signage, and active supervision.
- Fueling and lubricant transfer shall be attended at all times by authorized personnel. Engines shall be shut down during fueling unless manufacturer instructions require otherwise.
- Spill kits, absorbent pads, booms, drain covers, a shovel, disposal bags, and overpack materials shall be maintained at the laydown area, designated fueling area, and in service vehicles.
- Drip pans shall be used under fueling connections, hose breaks, and equipment service points. Nozzles and hoses shall be inspected before use.
- Leaking equipment shall be removed from service immediately and repaired off-line before being returned to the work area.
- Where practicable, fueling, storage, and maintenance shall be kept at least 100 feet from catch basins, drainage swales, wells, wetlands, and watercourses. Where the site layout makes this impossible, extra controls shall be used, including drain covers, absorbent booms, and direct supervision.
- Any approved AST or portable tank shall be double-walled or placed within secondary containment capable of holding the entire contents of the largest container plus precipitation allowance, with no direct discharge from the containment area.
- Accumulated rainwater in containment shall be inspected before removal. Water with sheen, odor, or other evidence of contamination shall be managed as waste and removed by an appropriate contractor.
- Waste oil, used absorbents, contaminated soil, and other cleanup residues shall be containerized, labeled, and removed from the site by an appropriately permitted contractor.

Control point	Minimum field requirement	Record / evidence
Before first fueling	Identify exact fueling area(s), spill kit locations, nearest drain inlets, and emergency contact sheet.	Site sketch; posted contact sheet

Control point	Minimum field requirement	Record / evidence
Daily	Inspect equipment for leaks; confirm spill kits stocked; verify fueling area clean and secured.	Daily inspection log
During fueling	Attended fueling only; drip pans deployed; absorbents at point of transfer.	Supervisor observation / toolbox talk
After any spill or near miss	Stop work as needed, clean up, document, and revise controls before work resumes.	Incident report and corrective action log
Project close-out	Remove temporary fuels, absorbents, and wastes; verify no staining or contamination remains.	Final environmental walkdown

7. Operational prevention and control requirements

- No routine fuel storage is planned on-site during normal operation. Any future generator, portable tank, or other new liquid storage introduced after operation begins shall trigger a revision to this Plan.
- The battery energy storage enclosure shall remain locked and fenced, with access limited to authorized personnel.
- Only qualified technicians and authorized utility personnel may perform maintenance that could expose coolant, refrigerant, transformer oil, or other liquids.
- During maintenance, absorbents, drain protection, and overpack containers shall be staged at the work location before lines, fittings, or components are opened.
- The exterior of the Megapack, transformer area, inverter/switchgear area, and surrounding pad / ground surface shall be inspected routinely for stains, sheens, unusual odors, fluid loss, or signs of impact damage.
- After severe weather, vehicle strike, alarm event, vandalism, or any abnormal operating condition, the site shall be inspected before returning equipment to service.
- A release beyond defensive field capability shall result in area isolation, immediate notification, and engagement of a spill cleanup contractor and qualified environmental professional, as appropriate.
- The project team shall maintain procedures and materials to block or capture any maintenance-related liquids or firewater runoff before it can reach catch basins or drainage pathways.

Inspection trigger	Minimum action
Routine periodic inspection	Check enclosure exterior, concrete pad / gravel, nearby drainage path, and any visible fluid indicators; restock spill kit if needed.
Post-maintenance	Verify no residual staining or liquid remains; remove temporary containers and wastes the same day where practicable.
Post-alarm / damage / storm	Isolate area, perform qualified inspection, and document whether any release or off-normal condition occurred.
Annual review	Review contacts, reporting thresholds, contractor information, and lessons learned from incidents or drills; reissue revised plan if needed.

8. Spill response and reporting protocol

Life safety comes first. Personnel shall not attempt offensive or technical hazardous materials response unless they are trained, equipped, and authorized to do so. The default expectation for project personnel is

defensive spill control only: stop the source if it is safe, isolate the area, protect drains, notify the proper parties, and bring in the appropriate responders.

Release / condition	Required immediate action
Fire, explosion risk, unknown material, visible vapor cloud, battery damage, or injury	Call 911; isolate and evacuate as needed; notify Guilford Fire Department, owner/operator contact, and DEEP if reportable; do not reopen battery enclosure.
Oil or petroleum release entering water, wetland, storm drain, sanitary sewer, combined sewer, or catch basin	Report immediately to CT DEEP; protect drains if safe; notify spill contractor and owner/operator; call NRC if federally reportable or sheen reaches navigable waters.
Oil or petroleum release 5 gallons or more within 24 hours	Report immediately to CT DEEP; initiate cleanup and documentation.
Smaller oil release not fully contained / removed within 2 hours of discovery	Report to CT DEEP and document response.
Non-oil reportable material entering water or drainage system, unknown material / quantity, PFAS-containing material, or release creating a hazard	Report to CT DEEP immediately; bring in qualified support.
Non-oil release 1.5 gallons or more liquid, or 10 pounds or more solid, within 24 hours	Report to CT DEEP unless an exemption clearly applies; document and coordinate cleanup.
Incidental release fully controlled by trained personnel with no off-site migration and no reporting trigger	Clean up promptly, containerize waste, complete internal spill report, and inspect area for residual impact.

When in doubt, report: Connecticut's release reporting rules are broad. If a release enters a catch basin or drainage system, involves an unknown quantity or material, creates a hazard, or cannot be fully controlled quickly by trained personnel, the conservative approach is to notify DEEP and document the event.

9. Notification flow

- 1) Protect people first: stop work, isolate hazards, evacuate if necessary, and call 911 for any fire, injury, unknown material, or hazardous battery event.
- 2) Protect the environment: stop the source if safe, cover or block drains, deploy absorbents / booms, and prevent migration.
- 3) Notify internal project contacts: Construction Spill Coordinator or O&M lead, owner/operator representative, and school/site contact.
- 4) Notify regulators and responders as required: CT DEEP, NRC if federally reportable, Guilford Fire / Police, spill cleanup contractor, LEP / PEP, utility, and Tesla technical support as appropriate.

- 5) Document and follow through: complete a spill report within 24 hours, preserve waste manifests or disposal records, and track corrective actions to closure.

10. Training, drills, and records

Audience	Training topic	Minimum timing	Record
All site personnel	Site orientation, spill recognition, emergency contacts, stop-work authority, drain protection	Before site access and as needed for new hires	Orientation sign-in sheet
Authorized fueling / service personnel	Fuel transfer procedures, drip pans, spill kit use, waste handling	Before first fueling and refresher as needed	Toolbox talk / competency record
Spill Coordinator / alternate	Reporting thresholds, notification chain, incident documentation, contractor callout	Before mobilization and annual review	Plan review acknowledgment
Operations / maintenance staff	OEM-specific leak isolation, abnormal condition response, maintenance spill control, post-event reporting	Before energization and annual refresher	O&M training record
Project team / responders	Tabletop or site walkthrough with school and fire department if practicable	Pre-operation and after major revisions	Meeting minutes / attendance log

11. Emergency and regulatory contacts

Organization / role	Phone / contact	Notes
Emergency - life safety	911	Fire, injury, unknown material, active hazardous event
CT DEEP Emergency Response Unit	860-424-3338 or 1-866-DEP-SPIL (1-866-337-7745)	24/7 spill reporting; backup 860-424-3333
National Response Center	800-424-8802	Use if federally reportable / sheen reaches navigable waters
Guilford Fire Department	911; Main Office 203-453-8056; Non-Emergency 203-453-8000	Primary local fire / EMS response
Guilford Police Department	911; Non-Emergency 203-453-8061	Law enforcement / traffic control
Guilford Fire Marshal's Office	203-453-8056	AHJ coordination / inspections

Organization / role	Phone / contact	Notes
Connecticut State Police Troop F - Westbrook	860-399-2100	State police support if needed
Shoreline Medical Center - Guilford	203-453-7900	Nearest emergency medical facility
Tesla Energy Technical Support	+1-650-681-6060	Product-specific technical guidance
CHEMTREC	800-424-9300	Transportation-related HazMat support / product emergency information
Permitted spill cleanup contractor	TBD	Required final project-specific insertion
Connecticut LEP / PEP / environmental support	TBD	Required final project-specific insertion

Appendix A - Spill report form

Date / time discovered	
Reported by / company / phone	
Exact location on site	
Material / substance released	
Estimated quantity and basis of estimate	
Did it reach soil, drain, catch basin, water, or off-site area?	
Cause / contributing factors	
Immediate response actions taken	
Notifications made (who / when / by whom)	
Cleanup contractor, waste disposition, follow-up actions	

Appendix B - Daily / weekly spill prevention inspection checklist

Inspection item	OK / needs action	Comments / corrective action
Spill kits stocked and accessible	[ ] OK [ ] Needs action	
Fueling / service area clean; no staining or sheen	[ ] OK [ ] Needs action	

Inspection item	OK / needs action	Comments / corrective action
Drain covers / booms available and undamaged	[ ] OK [ ] Needs action	
Equipment checked for leaks; leaking equipment removed from service	[ ] OK [ ] Needs action	
Temporary containers closed, secure, and labeled	[ ] OK [ ] Needs action	
Secondary containment intact and free of contaminated water	[ ] OK [ ] Needs action	
Emergency contact sheet posted and current	[ ] OK [ ] Needs action	

Appendix C - Required site exhibits to attach before filing

- Final marked-up site plan showing the designated fueling / service area, laydown area, spill kit locations, nearest catch basins or drainage pathways, and flow direction.
- Final contact list with Lantern Electrical superintendent / Spill Coordinator, alternate contact, owner/operator representative, permitted spill cleanup contractor, and LEP / PEP.
- List of any temporary ASTs, fuel cubes, generators, totes, or other oil containers 55 gallons or larger expected during construction, with storage capacity and containment description.
- Relevant SDS or OEM summary sheets for fuels, lubricants, coolant, refrigerant, and transformer insulating oil (if applicable).
- Record of plan review with the project team and, if practicable, school facilities staff and Guilford Fire Department.

Appendix D - Basis documents and references used to prepare this draft

- Connecticut Siting Council, Petition No. 1699 Interrogatories to Petitioner, dated March 11, 2026.
- Connecticut Siting Council, Petition No. 1699 Narrative, dated December 5, 2025.
- Connecticut Siting Council, Petition No. 1699 Emergency Response Plan, Exhibit H.
- Connecticut Department of Energy and Environmental Protection, Reporting Requirements for Spill Incidents.
- Connecticut Department of Energy and Environmental Protection, Emergency Response and Spill Prevention webpage.
- Connecticut Department of Energy and Environmental Protection, Permits to Act as a Contractor to Contain or Remove or Otherwise Mitigate the Effects of a Release.
- Connecticut release reporting regulations, RCSA 22a-450-2.
- U.S. EPA, Overview of the Spill Prevention, Control, and Countermeasure Regulation and SPCC Qualified Facilities Applicability guidance.