



**Northeast
Utilities System**

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February 28, 2006

Ms. Pamela B. Katz
Chairman
Connecticut Siting Council
10 Franklin Square
New Britain, CT 06051

Re: Docket No. CSC 272 - D&M Plans - Segment 4a

Dear Ms. Katz:

This letter provides the response to requests for the information listed below.

With this filing, the Company has completed responding to all of the interrogatories requested during this proceeding.

Response to CSC-04 Interrogatories dated 02/02/2006
D&M - 024 RV-01

Very truly yours,

Anne Bartosewicz
Project Director
Transmission Business
NUSCO
As Agent for CL&P

AB/tms
cc: Service List

**The Connecticut Light and Power Company
Docket No. D&M Plans**

**Data Request CSC-04
Dated: 02/02/2006
Q- D&M-024-RV01
Page 1 of 12**

**Witness: NO WITNESS
Request from: Connecticut Siting Council**

Question:

Provide a Spill Control and Countermeasure Plan. Would this be a comprehensive plan for the Middletown-Norwalk project?

Response:

Attached is the Spill Prevention and Response Plan, which is a comprehensive plan for the Middletown-Norwalk Project.

SPILL PREVENTION AND RESPONSE PLAN

1.0 INTRODUCTION

This Spill Prevention and Response Plan (SPRP) describes the measures to prevent, control and minimize impacts from a release of a hazardous, toxic or petroleum substance during construction of the Middletown to Norwalk 345-kV Transmission Project. This plan identifies the potentially hazardous materials to be used during this project; describes transport, storage, and disposal procedures for these substances; and, outlines procedures to be followed in the event of a release of a contaminating or toxic substance. CL&P's Owner's Representative (OR) are responsible for ensuring that all contractors implement and maintain spill control measures.

As per 40 CFR 112, a Spill Prevention Control and Countermeasures Plan (SPCC) must be prepared if the construction site will have 1,320 gallons of aboveground storage capacity or more (or 42,000 gallons in underground storage not regulated by UST rules) in containers 55 gallons or larger for six months or longer. This includes any temporary tanks or fueling trucks used to "store" petroleum on-site. Fueling trucks are subject to SPCC Plan rules when parked on the construction site and used for "storage." The Construction Contractor is responsible for complying with SPCC regulations.

2.0 TRAINING

The Construction Contractors will instruct their personnel on the operation and maintenance of equipment to prevent the accidental discharge or release of fuel, oil and lubricants. Personnel will also be made aware of sensitive resources along the project route as well as the pollution control laws, rules and regulations applicable to their work.

Regular spill prevention briefings with construction crews will be scheduled and conducted by the CL&P OR to ensure adequate understanding of spill prevention measures. These briefings will highlight:

- Precautionary measures to prevent releases;

- Sources of releases, such as equipment failure or malfunction;
- Standard operating procedures in case of a release;
- Equipment, materials, and supplies available for clean-up of a release; and,
- Lists of known spill events.

3.0 EQUIPMENT INSPECTION AND MAINTENANCE

The Construction Contractor will inspect and maintain equipment that must be fueled and or lubricated according to an established schedule. Construction equipment will be outfitted with appropriately sized spill containment kits. All containers, valves, pipelines and hoses will be examined regularly to assess general conditions. The examination will identify any signs of deterioration or leaks that could potentially lead to a release of fluids. All leaks will be promptly corrected and/or repaired. The construction sites will be provided with portable toilets that will be cleaned and maintained on a regular basis during construction.

4.0 REFUELING

The Construction Contractor will ensure that equipment is refueled and lubricated within the work areas and at least 100 feet away from all waterbodies and wetlands with the following exceptions:

- Areas such as rugged terrain or steep slopes where movement of equipment to refueling stations would cause excessive disturbance to the work areas;
- Areas where removing equipment from a wetland for servicing would increase adverse impacts to the wetland;
- Locations where the waterbody or wetland is located adjacent to a road crossing (from which the equipment can be serviced); and,
- Refueling of immobile equipment.

In these areas, auxiliary fuel tanks will be used to reduce the frequency of refueling operations and in no case will refueling take place within 100 feet of any known potable water wells.

The Construction Contractor will prepare for approval by CL&P a list of the type, quantity and storage location of spill containment and cleanup equipment to be used during construction.

All releases will be cleaned up immediately. Spill containment equipment will not be used for storing contaminated material.

5.0 STORAGE

No petroleum products or refueling equipment will be stored within 100 feet of a waterbody or wetland. The containment area for storage of petroleum products will have a capacity of 1.1 times the maximum volume of the largest container. Storage areas will not have drains unless such drains lead to a containment area or vessel where the entire release can be recovered. A berm, or other suitable containment device, will be installed around any storage shed housing potential environmentally hazardous materials. The Contractor, subject to approval by the CL&P OR, will designate areas where fuel trucks, mobile tanks and lubricating vehicles will be parked when not in use.

6.0 SPILL RESPONSE

Containment is the immediate priority in the case of a release. Cleanup procedures will begin immediately after a release is contained. In no case will containment equipment be used to store contaminated material.

In case of a release, the Construction Contractor will notify the CL&P OR immediately. The following contacts are currently assigned to the Project and are subject to change:

CL&P Office (Berlin, Connecticut)

General Office Number: (800) 989-0900

Emergency: (800) 992-3427

Project Director: Anne Bartosewicz Office – (860)665-2771

Cell – (860)205-1846

Transmission-Team Leader Environmental and Safety: D. Sean Martin

Office – (860)665-6664

Cell – (413)774-0399

Burns & McDonnell Environmental Project Manager: Edward Beene

Office – (203)284-8590, x 236

Cell - (860)462-5862

The National Response Center (NRC) (1-800-424-8802) and CTDEP (860-424-3338) will be notified immediately of reportable releases. For the NRC that includes any releases in waters of the U.S. For the CTDEP that would be any release of any quantity of a listed substance. In addition, spills in a waterway will be immediately reported to the NRC. In no case will notification be greater than thirty minutes from the time the release is identified. If the release enters a body of water, the Construction Contractor will immediately take samples upstream and downstream from point of entry and ice down the samples. If advised, additional analysis will be completed and/or additional samples will be gathered.

If the CL&P OR determines that a release is small enough that the construction crew can safely contain it and the crew is properly trained, the crew will use on-site equipment to containerize all spilled material, contaminated soil and sorbent material in a manner consistent with the spilled materials' characterization.

If the CL&P OR determines that a release cannot be adequately excavated and disposed of by the construction crew alone, the Construction Contractor will contact one of the pre-approved spill-response contractors noted below:

Spill-Response Contractors

Environmental Services, Inc.

90 Brookfield Street

South Windsor, CT 06074

(800) 486-7745

(860) 528-9500

Fleet Environmental Services, LLC
3 Trowbridge Drive (203) 744-3477
Francis J. Clark Industrial Park (800) 562-7611
Bethel, CT 06801

Clean Harbors Environmental, Inc. (860) 583-8917
761 Middle Street (800) 637-2666 (24 hrs.)
Bristol, CT 06010

The OR will ensure that all excavated wastes are transported to a licensed disposal facility approved by CL&P.

The Construction Contractor will prepare a Spill Report form to be given to the CL&P OR that includes:

- The date, time and location of the occurrence;
- Description of the material spilled;
- The quantity spilled;
- The circumstances that caused the spill;
- A list of water bodies affected or potentially affected by the release;
- A statement verifying whether a sheen is present;
- The size of the affected area;
- An estimate of the depth that the material has reached in water or on soil;
- A determination of whether the release will migrate off Northeast Utilities System property (or ROW) or the work areas;
- A determination of whether the release is under control;
- A statement verifying that clean-up has begun and a description of the methods being used to clean up the release;
- The names of the people observing the release (with their affiliations); and,
- Listing of any soil and water samples taken.

The CL&P OR will ensure that the Construction Contractor's spill report is complete and will submit it to D. Sean Martin, Transmission-Team Leader Environmental and Safety. The CL&P OR will ensure that the Construction Contractor notifies the appropriate agencies if it is determined that a release exceeds reportable quantity thresholds and/or is in a water of the U.S. The federal reportable spill quantities for hazardous materials are listed in 40 CFR, Part 302.4 in the table entitled "List of Hazardous Substances and Reportable Quantities."

7.0 EQUIPMENT LIST

The Construction Contractor will prepare a list of the type, quantity and location of storage or containment and cleanup equipment to be used on the construction site. The list will include the procedures and impact minimization measures to be used in response to a release. The Contractor's choice of impact minimization measures and equipment will be modified to meet the characteristics of the affected terrain as well as the types and amounts of material that could potentially be released. Material Safety Data Sheets will be on file at the Contractor's field office.

7.1 Terrestrial Construction

General equipment that will be used for spill containment and cleanup on terrestrial areas includes:

- Sorbents (pillows, socks, and wipe sheets) for containment and pick-up of spilled liquids;
- Pre-packaged, self-contained spill kits containing a variety of sorbents for small to large releases;
- Structures such as gutters, culverts and dikes for immediate spill containment;
- Shovels, backhoes, etc, for excavating contaminated materials;
- Sumps and collection system; and,
- Drums, barrels and temporary storage bags to clean up and transport contaminated materials.

7.2 Fuels and Lubricating Oil Storage

The Construction Contractor will implement special measures to prevent releases in areas where fuel trucks and oil barrels are loaded. Containment equipment will be kept close to tanks and barrels to minimize spill response time and will include absorbent pads and/or mats. The quantity and capabilities of the mats will be sufficient to capture the largest foreseeable spill given workspace characteristics, crankcase and other fuel vessel capacities. The Contractor, subject to approval by the CL&P OR, will designate specific areas where fuel trucks, mobile tanks and lubrication vehicles will be parked when not in use.

7.3 Routine Refueling and Maintenance

Absorbent pads and mats will be placed on the ground beneath equipment before refueling and maintenance. Equipment that will be stored on site for routine refueling and maintenance includes small sorbent kits (or their functional equivalent).

7.4 Equipment Failure

Kits that can be stored beneath the operator's seat on construction equipment and with the capacity of absorbing up to five gallons of liquid will be available to operators for use in case of equipment failure.

7.5 Water body and Wetland Crossings

The equipment listed below will be available in addition to that needed for terrestrial construction:

- Oil containment booms and the related equipment needed for rapid deployment; and,
- Equipment to remove petroleum-based products from water.

The equipment listed above will be located near wetlands and water bodies to reduce response time in the unlikely event there is a release.

8.0 OIL AND HAZARDOUS MATERIALS MANAGEMENT

Areas along the ROW deemed to be of concern due to a potential risk for a release will have soil and, as appropriate, groundwater sampling performed on site prior to construction. The results of sampling will be used to determine construction baselines and methodologies. Based on the results of the pre-construction sampling, the environmental conditions of the site may be monitored during construction to properly handle soil and groundwater as well as to assure the health and safety of workers. Examples of construction monitoring that might occur include periodic sampling of excavated soil, headspace analyses of groundwater in excavation as well as monitoring of the breathing zone around the construction workers. All oil and hazardous materials management will be carried out in accordance with local, state and Federal guidelines.

APPENDIX A

SPILL REPORTING INFORMATION

Spill Report

Date: _____ Time of Spill Occurrence: _____

Name/Title of the first observer: _____

Name/Title of the other observers: _____

Regulatory Agencies Notified/Time (date) of Notification: _____

Location of spill (Attach photo copy of alignment map, if necessary)

• County _____ • Parcel Nos. _____

• Town _____

Waterbody (if any): _____

Type of material spilled: _____

Quantity Spilled:

• 10 gallons or less _____ • Between 10 and 1000 gallons _____

• Over 1000 gallons _____ • (specify approximate amount) _____

Circumstances causing spill:

If spill is into water, is a sheen present? _____

Size of area affected by spill: _____

Estimate depth of spilled material on water or soil: _____

Has spill left Company property or right-of-way? _____

Is spill under control? If not, is there a potential for the spill to leave the right-of-way or staging area ?

Has spill cleanup begun? If so, what methods are being or will be used?

List of soil and/or water samples taken attached.

Signature of Contractor Representative/Date Signature of Environmental Inspector/Date
