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Via E-Mail and US Mail Certified Return Receipt

Connecticut Siting Council
Ten Franklin Square
New Britain, CT 06051

Re: Docket 272 - Post Road, Fairfield CT

Exide Group Incorporated (“we” or “Exide”) is the owner of 2190 Post Road, Fairfield, CT 06824 (the “Property”). Since 1987, we have been subject to an Order issued by the Connecticut Department of Environmental Protection (“DEP”) (Order WC 4893, issued November 27, 1987, the “Order”) directing measures to address alleged contamination at the Property and adjacent Mill River. Pursuant to the Order, Exide has expended and continues to expend substantial resources to implement appropriate remedial actions in response to these concerns.

The efforts by The Connecticut Light and Power Company (“CL&P”), to obtain an easement over the Property and to conduct work on and adjacent to the Property, including in the Mill River, and to install and operate certain transmission facilities, may have substantial impacts on the alleged contamination and on past and future remedial actions required on and adjacent to the Property. Specifically, these proposed actions by CL&P could adversely affect Exide, including its rights and obligations under the Order, and subject us as well as the public to additional risks, including environmental risks.

To fully assess the potential environmental impact of CL&P’s proposed plans, we request that CL&P answer the following preliminary questions. The comments provided are included to understand the scope and reason for some of these questions.

(1) How will CL&P address soil quality for soils excavated in the CTDOT Right-of-Way not previously tested by Exide or CL&P?

We note that soil quality data along the route indicates only background (low) lead concentrations were detected.

(2) How will CL&P address treatment and disposal of any impacted water encountered during excavation?

We note that the only groundwater sample collected in the vicinity under consideration indicated an elevated total lead concentration. This might be associated with turbidity in the sample and therefore dewatering wastewaters would require solids separation (settling and or filtration) prior to discharge to sanitary sewer or surface water.

(3) How will CL&P ensure security of the Exide site during construction activities?

We note that construction of the Duct Bank will require removal and replacement of a portion of the Exide chain link fence along Boston Post Road between the West Gate and Mill River.

(4) A. If the active storm drain(s) is/are disturbed, how will CL&P maintain proper drainage of the Post Road in this area?

B. There is a base line flow in this pipe. How will this flow be addressed?

C. If the piping is disturbed, how will handling/disposal of sediment buildup in the piping be addressed?

D. If the piping/discharge points are disturbed, what precautions will be taken to prevent redistribution/transport of impacted sediments present in or impacted soil (if any) below the piping?

It appears that construction of the Duct Bank will apparently disturb the active former Exide drain (discharge point SS-27 now used by CTDOT) and the abandoned CTDOT drain (discharge point SS-28) between Stations 516+00 and 516+50. Historical sampling of the contents both of these drains has indicated the presence of debris with total lead concentrations above background.

(5) What construction practices will be followed and how will they address the potential for re-suspension/transport of impacted sediments during mobilization, construction and demobilization from the site? Issues of concern which need to be addressed include, but are not limited to, treatment/disposal of dewatering wastewaters, installation/removal of coffer dams or other construction devices, and maintenance of storm flows from the discharges to the Mill River at the East abutment.

The construction of the eastern utility bridge abutment (apparently near station 514+00 to 515+00) is in an area of the river area near discharge points SS-27 and SS-28 where elevated sediment lead concentrations (above 5% total lead) were documented during sampling performed in 1990 (as reported in the June 1992 Engineering Report). Note that a similar condition (with lower sediment lead concentrations) exists for the west abutment as well. The issues associated with construction of a bridge abutment in this area center around the potential for disturbance of lead impacted river sediments which could (even if appropriate Best Management Practices are incorporated in the construction procedures, e.g. coffer dams, silt/turbidity curtains) result in re-suspension and downstream re-deposition of these sediments.

Please note that the questions listed above are based on the information we have been provided to date and that Exide may have additional questions as information becomes available to us in the future.

We look forward to working with the Siting Council, CL&P and CL&P's engineers in the future on this matter. Please do not hesitate to contact me with any questions or concerns.

Sincerely,

K. L. Money

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Vice President
Exide Group Incorporated