

October 14, 2024

Gary Trombly, Jr.
Supervising Environmental Analyst
Department of Energy and Environmental Protection
Emergency Response and Spill Prevention Division
Bureau of Materials Management and Compliance Assurance
79 Elm Street
Hartford, Connecticut 06106

Re: Partial Consent Order #COWSPCB 15-001

Monthly Progress Report – September 2024

Dear Mr. Trombly:

Pursuant to paragraph B.6. of the Partial Consent Order (PCO) between the Commissioner of Energy and Environmental Protection (the "Commissioner") and The United Illuminating Company ("UI"), UI is submitting the following Progress Report for the month of September 2024.

In accordance with Section B., 13 of the PCO, the undersigned certify as follows:

"I have personally examined and am familiar with the information submitted in this document and all attachments thereto, and I certify, based on reasonable investigation, including my inquiry of those individuals responsible for obtaining the information, that the submitted information is true, accurate and complete to the best of my knowledge and belief. I understand that any false statement made in the submitted information is punishable as a criminal offense under §53a-157b of the Connecticut General Statutes and any other applicable law."

If you have any questions regarding this submittal, please do not hesitate to contact Eric Boswell at (860) 508-6375 or eboswell@avangrid.com.

THE UNITED ILLUMINATING COMPANY

Franklyn Reynolds President & CEO

Fred Reynolds

UIL Holdings Corporation

Eric J. Boswell

Project Manager Remediation

Avangrid

FORMER ENGLISH STATION PROJECT MONTHLY PROGRESS REPORT

September 2024

Partial Consent Order: COWSPCB 15-001 Respondent: The United Illuminating Co. (UI)

UI Project Manager: E. Boswell **LEP:** Marya B Mahoney - TRC

Reporting Period: September 2024

Site Information: Former English Station

510/510A Grand Avenue

New Haven, CT

1. Main Activities During Reporting Period:

- a. Continued preparation and review of the following Project-related documents/reports for submittal to CTDEEP:
 - i. Revised English Station Boiler 1-12 Environmental Media Investigation Summary Report.
 - ii. Revised English Station Western Side Environmental Media Investigation Summary Report.
 - iii. English Station Boiler #13 Interim Remedial Measures PCB Remedial Action Report.
- Performed site maintenance activities along Grand Avenue including vegetation management, resecuring of screening fabric to fence, covering graffiti on sections of the fence, and removal of debris/trash.
- c. Performed required inspections of:
 - i. Erosion and sediment controls (re)approved under CT DEEP permit number GSN003422 on a monthly frequency.
 - ii. Eight Significant Environmental Hazard (SEH) areas on a bi-weekly frequency.

2. Future Activities:

- a. Submit to CTDEEP:
 - i. Revised English Station Western Side Environmental Media Investigation Summary Report.
 - ii. Revised English Station Boiler 1-12 Environmental Media Investigation Summary Report.
 - iii. English Station Boiler #13 Interim Remedial Measures PCB Remedial Action Report.
 - iv. Revised Plans and Specifications for Phase 1 Soil Remediation.

3. Site Security:

a. Continue to maintain the security measures put in place by the property owners as of August 2016, and as subsequently upgraded by UI.

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September 2024

4. Estimated Costs Incurred to Date (30 September 2024):

Category	Expense (\$) (As of 30Sept2024)				
Eligible Expenses ¹					
Contractor-Environmental Remediation &					
Construction Services ²	\$10,523,848				
LEP, Engineering & Professional Services	\$6,106,479				
Miscellaneous	(\$60,711)				
Site Security	\$475,914				
Support Related Services	\$41,633				
Analytical Lab Services (2017-2019)	\$96,066				
Eligible Expenses Total	\$17,183,228				
Non-Eligible Expenses ³					
External Support & Expenses	\$3,055,646				
UI Internal & Overhead	\$517,708				
Non-Eligible Expenses Total	\$3,573,353				
Total	\$20,756,581				

 $^{^{\}rm 1}$ External project expenses for investigation, remediation & cost of compliance with PCO. $^{\rm 2}$ Includes Interim Asbestos Abatement

³ Legal and/or other internal related expenses.

FORMER ENGLISH STATION PROJECT MONTHLY PROGRESS REPORT

September 2024

Milestone Table

PCO			Planned Completion	Completion
Reference	Milestone	General Timing Requirement	Date*	Date
B.4	Effective Date	Defined as the later of the closing of the transaction (as further defined in B.4) or when the PCO becomes a final order of the Commissioner		8/4/2016
B.5	Access Date	Defined as the date that the Commissioner provides written notification the Required Access (as further defined in B.18) has been secured		8/10/2016
B.1.a	Retain LEP	On or before thirty (30) days from the Effective Date of this order	9/3/2016	8/25/2016
B.1.b	Submit Scope of Study	On or before sixty (60) days from the Access Date of this order	10/11/2016	10/11/2016
B.1.c	Submit Supplemental Plan and Schedule (if determined necessary by Commissioner)	On or before thirty (30) days after notice from the Commissioner that such supplemental plan is required	Several	Several
B.1.d	Implementation of Approved Scope of Study - Property	In accordance with the approved schedules		Several
B.1.e	Submit Investigation Report/Remedial Alternatives Assessment Report and schedule to perform remedial actions (all in accordance with details under B.1.e)	On or before thirty (30) days after the approved date for completion of the investigation		Several
B.1.f	Submit for Commissioner review and written approval, contract plans and specifications for the approved remedial actions, a revised list of all permits and approvals required for on-site actions and a revised schedule for applying for and obtaining such permits and approvals, consistent with all applicable state and federals statutes and regulations under the CO	Unless otherwise specified in writing by the Commissioner, on or before thirty (30) days after approval of the report described in Section B.1.e of the PCO		Several
B.1.g	Implementation of the Approved Remedial Actions	In accordance with the approved schedule		Several
B.1.g	Notify Commissioner of completion of approved remedial actions	Within 15 days of completion of remedial action		
B.1.j	Submission of a supplemental remedial plan and schedule for the Commissioner's review and written approval	On or before thirty (30) days after notice from the Commissioner that such supplemental plan is required (unless otherwise specified by the Commissioner)		Several
B.1.j	Submission of a report describing the results (to date) of the approved monitoring program to determine the effectiveness of the on-site remedial actions	On a schedule established by the Commissioner or if no such schedule is established, on a quarterly basis beginning no later than ninety (90) days after the completion of the approved remedial actions or, as applicable, supplemental remedial actions		
B.1.6	Monthly Progress Reports	On or before the last business day of the month UI submits summary of activities performed during month, summary of activities anticiapted to be performed for upcoming month, security, and financials broken down by a task or discipline		Completed for each month from 8/2016 through current month 9/2024
*Plan dates are	based on risks associated with the project. As activities	progress, explanations will be provided for a sch	nedule variance.	