



November 19, 2025

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 – October 2025

Dear Mr. Trombly:

Pursuant to Section 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 October 2025.

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

A handwritten signature in cursive script, reading 'Franklyn Reynolds', written in black ink.

Franklyn Reynolds
President & CEO
UIL Holdings Corporation

A handwritten signature in cursive script, reading 'Eric J. Boswell', written in black ink.

Eric J. Boswell
Project Manager Remediation
Avangrid

FORMER ENGLISH STATION PROJECT MONTHLY PROGRESS REPORT

October 2025

Partial Consent Order: COWSPCB 15-001

UI Project Manager: E. Boswell

LEP: Marya B. Mahoney - TRC

Respondent: The United Illuminating Co. (UI)

Reporting Period: October 2025

Site Information: Former English Station
510/510A Grand Avenue
New Haven, CT

1. Main Activities During Reporting Period:

- a. Additional public notice for soil remediation was published in the New Haven Register on October 1, 2025. Letters regarding the additional public notice for soil remediation were sent directly to the Mayor of New Haven, the New Haven Director of Health and the Commissioner of CTDEEP. A sign was erected on the west gate of the Site providing notice of remediation. The public notice activities were performed in accordance with § 22a-133k-1(d) of the Regulations of Connecticut State Agencies.
- b. On October 2, 2025, UI submitted to USEPA and CTDEEP a technical memorandum addressing pre-excavation PCB verification sampling results for proposed excavations requiring support to perform PCB soil remediation on Parcel A in accordance with the USEPA approval of the 2019 English Station Parcel A PCB Soil Remedial Action Plan.
- c. On October 7, 2025, UI submitted to USEPA and CTDEEP responses to USEPA's comments dated September 28, 2025 on the Contractor Work Plan for Parcel A PCB soil remediation. On October 15, 2025, USEPA advised UI by email that their review was complete and that USEPA had no further comments or questions.
- d. On October 14, 2025, CTDEEP issued a Disapproval of the Technical Specifications and Drawings for soil remediation at the Site as updated by UI on August 22, 2025 to incorporate UI's use of proposed borrow fill material as approved by CTDEEP. To address CTDEEP's comments in this Disapproval of the Technical Specifications and Drawings letter, Revised Technical Specifications and Drawings were submitted to CTDEEP by UI on October 24, 2025.
- e. Pending receipt of CTDEEP's approval of the Revised Technical Specifications and Drawings, UI has continued work on Project-related documents and planning associated with Parcel A PCB and non-PCB soil remediation activities, including contractor submittals from Manafort Brothers, Inc. (MBI).
- f. UI performed required inspections of:
 - i. Erosion and sediment controls (re)approved under CTDEEP permit number GSN003422, on a monthly frequency.
 - ii. Eight Significant Environmental Hazard ("SEH") areas, on a bi-weekly frequency.

2. Future Activities:

- a. Commence soil remediation activities on Parcel A following receipt of CTDEEP approval of the contractor plans and specifications, subject to contractor availability and weather conditions. The initial tasks will include:
 - i. Contractor (MBI) mobilization of temporary facilities for Parcel A soil remediation work.
 - ii. Removal and disposal of debris pile materials on Parcel A in accordance with the approved RAP. Sampling of media underlying the debris pile materials as required by the approved RAP.

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- iii. Replacement and installation of soil erosion and sediment control measures as necessary during performance of indicated Parcel A soil remediation activities.
- iv. Waste characterization sampling for soil disposal.
- b. Provide to CTDEEP a summary of comments received following the additional public notice and UI's responses to these comments.

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.
- b. On October 10, 2025, the bulkhead perimeter fencing was completed, further restricting potential access to the Site from the Mill River.
- c. No trespasser incidents were identified during the month of October 2025.

4. Estimated Costs Incurred to Date (31 October 2025):

Category	Expense (\$) (As of 31 Oct. 2025)
Eligible Expenses¹	
Contractor-Environmental Remediation & Construction Services ²	\$10,801,659
LEP, Engineering & Professional Services	\$6,262,123
Miscellaneous	(\$58,711)
Site Security	\$479,282
Support Related Services	\$74,660
Analytical Lab Services (2017-2019)	\$96,066
Eligible Expenses Total	\$17,655,649
Non-Eligible Expenses³	
External Support & Expenses	\$3,166,932
UI Internal & Overhead	\$517,708
Non-Eligible Expenses Total	\$3,684,640
Total	\$21,340,289

¹ External project expenses for investigation, remediation & cost of compliance with PCO.

² Includes Interim Asbestos Abatement.

³ Legal and/or other internal-related expenses.

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Milestone Table

PCO Reference	Milestone	General Timing Requirement	Planned Completion Date*	Completion 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 federal 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.i	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.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 anticipated to be performed for upcoming month, security, and financials broken down by a task or discipline		Completed for each month, 8/2016 through 10/2025

*Plan dates are based on risks associated with the project. As activities progress, explanations will be provided for a schedule variance.