



October 15, 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 – September 2025

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 2025.

In accordance with paragraph 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

September 2025

Partial Consent Order: COWSPCB 15-001
UI Project Manager: E. Boswell
LEP: Marya B Mahoney - TRC

Respondent: United Illuminating Co. (UI)
Reporting Period: September 2025

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

1. Main Activities During Reporting Period:

- a. On September 9, 2025, UI submitted the Contractor Work Plan for Parcel A PCB remediation to USEPA for review and approval in accordance with the USEPA December 17, 2019 approval of the English Station Parcel A PCB Soil Remedial Action Plan. USEPA provided comments on September 28, 2025, which UI will respond to in early October 2025.
- b. In September 2025, UI provided USEPA with the following submittals per General Condition 12 of the *PCB Cleanup and Risk-Based Disposal Approval* (December 17, 2019) for Parcel A at English Station:
 - i. Contractor Work Plan
 - ii. Remediation contractor certification letter for Manafort Brothers, Inc. (MBI).
 - iii. Analytical laboratory certification letters for Pace New England and SGS North America, Inc.Copies of these submittals to USEPA were provided to CTDEEP.
- c. On September 28, 2025, UI submitted to CTDEEP a technical memorandum for sampling processed rock aggregate (PRA) at Tilcon's Wallingford, CT rock quarry in accordance with the CTDEEP Approval with Conditions of the *Request Relating to Use of Processed Rock Aggregate Borrow Source(s) for Fill and Backfill (Fill)*, dated May 29, 2025. Five samples were collected representing up to 1,250 cubic yards of PRA for use as fill during planned remediation of Parcel A.
- d. UI continued work on Project-related documents and planning associated with Parcel A PCB and non-PCB soil remediation activities, including contractor submittals from MBI.
- e. 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.
- f. In response to a call with USEPA and CTDEEP on September 4, 2025, UI directed TRC to collect and analyze supplemental surface soil samples at previous (2019) pre-verification sampling locations. The purpose of the sampling was to evaluate potential change, if any, in site conditions over time. The sampling results did not identify any change.

2. Future Activities:

- a. UI will submit to USEPA per General Condition 12 of the *PCB Cleanup and Risk-Based Disposal Approval* (December 17, 2019) for Parcel A at English Station:
 - i. pre-verification and supplemental soil sampling results.

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- b. UI will commence soil remediation on Parcel A following receipt of CTDEEP approval of the April 2022 contractor plans and soil remediation specifications that pertain to the Parcel A soil remediation (as supplemented on August 22, 2025 in response to CTDEEP's request. The initial tasks include:
 - i. Contractor (MBI) mobilization of temporary facilities for Parcel A soil remediation work.
 - ii. Removal and disposal of debris pile material on Parcel A in accordance with the approved RAP. Sampling of media underlying the debris pile materials as required by the approved RAP.
 - iii. Replacement and installation of soil erosion and sediment control measures.
 - iv. Waste characterization sampling.
- c. Respond to USEPA comments on the Contractor Work Plan for Parcel A PCB soil remediation.
- d. Arrange for an additional Public Notice of remediation and notify the CTDEEP Commissioner, the New Haven Mayor, and the New Haven Director of Health as well.

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. Installation of a fence along the bulkhead continued through September.
- c. On September 29, 2025, three trespassers entered the site, but did not enter the building. The trespassers were detained by the New Haven Police as they left the Site by Grand Avenue.

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4. Estimated Costs Incurred to Date (30 September 2025):

Category	Expense (\$) (As of 30 Sept. 2025)
Eligible Expenses¹	
Contractor-Environmental Remediation & Construction Services ²	\$10,666,800
LEP, Engineering & Professional Services	\$6,228,357
Miscellaneous	(\$59,711)
Site Security	\$479,282
Support Related Services	\$74,109
Analytical Lab Services (2017-2019)	\$96,066
Eligible Expenses Total	\$17,485,334
Non-Eligible Expenses³	
External Support & Expenses	\$3,155,564
UI Internal & Overhead	\$517,708
Non-Eligible Expenses Total	\$3,673,272
Total	\$21,158,606

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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September 2025

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 9/2025

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