



ENVIRONMENTAL MANAGEMENT PLAN FOR DECOMMISSIONING AND RECLAMATION OF ELECTRICAL FACILITIES

Updated:
July 9, 2015

Questions regarding this document shall be submitted to:

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PURPOSE AND OVERVIEW:

The lifecycle of the electrical transmission system eventually requires the decommissioning and reclamation of electrical facilities. This document is VELCO's environmental management plan for these activities. The plan provides VELCO's standard practices that, subject to reasonable modifications to suit specific site conditions or safety concerns, VELCO follows to decommission electrical facilities. In general, facility decommissioning includes the following activities:

PRELIMINARY SITE INVESTIGATION:

- Review facility information to determine design elements (e.g. facility age and past upgrades, oil filled equipment locations, oil containment system, grounding specifications, drainage piping, wastewater and water supply connections, foundation depths, etc.).
- Review available documentation to determine if any releases of oil or hazardous material (OHM) have occurred at the facility and if so, review past remediation activities.
- Review available natural and cultural resource data and site-specific permits and commitments to determine areas that may affect decommissioning work crews and identify specific restoration practices that may be required.
- Conduct a comprehensive inspection of the facility for evidence of OHM releases that includes a review of visible staining and/or olfactory indicators.
- Perform an asbestos and lead-paint survey of the control building and/or applicable equipment based upon the information review.
- Collect confirmatory soil samples from the site and analyze for the presence of OHM. Sampling locations should target areas surrounding current or former locations of oil filled equipment and/or areas of past releases. Samples collected at typical VELCO facilities should be analyzed for TPH-DRO and PCBs; however, the analytical suite may be adjusted based upon the results of the investigative steps listed above.
- If the preliminary site investigation confirmatory soil sampling results exceed the appropriate Vermont Soil Screening Values (SSVs), the VELCO Environmental Team will contact the Vermont Agency of Natural Resource's Waste Management & Prevention Division (WMD) to develop and coordinate a sampling and remediation work plan, to address the extent and magnitude of the contamination. The work plan and remediation efforts will be developed in accordance with Vermont's Investigation and Remediation of Contaminated Properties Procedure.

DECOMMISSIONING ACTIVITIES:

- Whenever possible, and in coordination with VELCO Operations and Construction, completely de-energize the site to ensure a safe working environment at the facility.
- Perform additional environmental quality sampling and site remediation, as determined by WMD consultation and as described in the site-specific Work Plan.
- Remove fencing and aboveground electrical equipment and conductors.
- Maintain safe and secure storage of the decommissioned oil containing equipment awaiting reuse, recycle or disposal.
- Remove any accumulated rainwater in on-site containment systems (if present).
- Remove containment systems and drainage piping.
- Remove surfacing stone.
- Remove concrete foundations entirely or (if not practicable to remove entirely) remove concrete foundations a depth of approximately four feet below ground surface (bgs), and cut exposed rebar.
- Remove control building(s) and other aboveground structures and improvements.
- Remove and/or fill septic tank(s) and piping in accordance with Vermont state rules and regulations.
- Remove any underground fuel storage tanks in accordance with Vermont state rules and regulations.
- Remove well pump and associated electrical wires and piping and close out well in accordance with Vermont state rules and regulations
- Decommission wood transmission line structures in accordance with applicable BMPs.
- Remove grounding wires and anchor assemblies.
- Remove all underground conduits and cable trenches that are not below the four foot depth to the finish grade.

RESTORATION ACTIVITIES:

- Install erosion controls, as needed
- Place topsoil (loam or previously segregated soils) over disturbed areas, matching native soil profiles to the extent practicable.
 - Topsoil should be free of large stones and woody debris.
 - Avoid mixing topsoil with subsoils.
 - Avoid driving on the soil with heavy equipment during wet conditions to avoid severe soil compaction.
- Grade soil to obtain slopes between 0% and 8%, with no concave areas where water can collect.
- Seed all disturbed areas with a VELCO-approved seed mix.
- Mulch all seeded areas with a minimum of 2 tons/acre of hay mulch.
- Remove all trash, unneeded erosion controls, and other debris from the site.