A01-0021

PG&E National Energy Group

46 Centerra Parkway
Lebanon, NH 03766

603.653.9232
Fax: 603.653.9270

September 22, 2000

The Performance Track Information Center
c/o Industrial Economics Incorporated
2067 Massachusetts Avenue
Cambridge, MA 02140

RE: Submittal of National Environmental Achievement Track Application Package

Dear Sir or Madam:

Enclosed please find a completed National Environmental Achievement Track application package for PG&E National Energy Group's USGen New England, Inc. Hydro Generation System. As the application and supplemental materials describe, our hydroelectric generating system may be considered a rather unusual applicant for the NEAT program. However, multiple facilities located in three states are operated under a single, comprehensive Environmental Management System (EMS), and are thus considered one "facility" for purposes of this program.

There are many unique characteristics of hydroelectric plant operation which have influenced the design and implementation of our EMS. Since you may not have direct experience with hydroelectric facilities, I would welcome the opportunity to meet with you to answer any questions you may have, or to provide you with additional details about our facilities and our EMS.

Please contact me at (603) 653-9233 if you wish to discuss our application or our hydroelectric operations.

Sincerely,

Maryalice Fischer

Maryalice Fischer

Hydro Environmental Manager
PG&E National Energy Group, USGen New England, Inc.
46 Centerra Parkway, Suite 100
Lebanon, NH 03766

enclosure

cc: A. Vogel-Marr, PG&E National Energy Group
J. Holbrook, EPA New England

PG&E National Energy Group and any other company referenced herein which uses the PG&E name or logo are not the same company as Pacific Gas and Electric Company, the California utility. These companies are not regulated by the California Public Utilities Commission, and customers do not have to buy products from these companies in order to continue to receive quality regulated services from the utility.

A01-0021

National Environmental Achievement Track

Application Form

USGen New England, Inc - Hydro Generation
Name of facility

PG&E National Energy Group
Name of parent company (if any)

46 Centerra Parkway, Suite 100
Street address

Street address (continued)

Lebanon, NH 03766
City/State/Zip code

Give us information about your contact person for the National Environmental Achievement Track Program.

Maryalice Fischer

Hydro Environmental Manager

Phone (603) 653-9233

Fax (603) 653-9270

E-mail maryalice.fischer@neg.pge.com

Section A

Tell us about your facility.

Why do we need this information?

EPA needs background information on your facility to evaluate your application.

What do you need to do?

- Provide background information on your facility.
- Identify your environmental requirements.

1 What do you do or make at your facility?

Hydroelectric power generation for the wholesale market.

2 List the Standard Industrial Classification (SIC) code(s) or North American Industrial Classification System (NAICS) codes that you use to classify business at your facility.

SIC
4911

NAICS

3 Does your company meet the Small Business Administration definition of a small business for your sector?

☐ Yes ☒ No

4 How many employees (full-time equivalents) currently work at your facility?

☐ Fewer than 50

☒ 50-99

☐ 100-499

☐ 500-1,000

☐ More than 1,000

5 Does your facility have an EPA ID number(s)?

If yes, list in the right-hand column.

☒ Yes ☐ No

List of facilities and EPA ID numbers is attached to the Environmental Requirements Checklist, enclosed.

6 Identify the environmental requirements that apply to your facility. Use the Environmental Requirements Checklist, at the back of the instructions, as a reference. List your requirements to the right *or* enclose a completed Checklist with your application.

Completed checklist is attached.

7 Check the appropriate box in the right-hand column.

☐ I've listed the requirements above.

☒ I've enclosed the Checklist with my application.

8 Optional: Is there anything else you would like to tell us about your facility?

The USGen New England, Inc. Hydro Generation System is operated and managed by PG&E Generating Company as one integrated, regional hydroelectric generating system. It is managed under a single comprehensive EMS program, and is thus seeking NEAT program status as if it were a single "facility" through this single application.

The "facility" included in this application consists of 15 hydro generating facilities (1100 MW total capacity) constructed between 1909 and 1974. Also included in the system are: 18 dams, 6 storage reservoirs, auxiliary buildings, and approximately 32,000 acres of land located along the Connecticut River in New Hampshire and Vermont, and along the Deerfield River in southern Vermont and western Massachusetts. Refer to attached descriptive documents.

Section B

Tell us about your EMS.

Why do we need this information?

Facilities must have an operating Environmental Management System (EMS) that meets certain requirements.

What do you need to do?

- Confirm that your EMS meets the Achievement Track requirements.
- Tell us if you have completed a self-assessment or have had a third-party assessment of your EMS.

1 Check ***yes*** if your EMS meets the requirements for each element below as defined in the instructions.

a. Environmental policy — ☒ Yes – The commitment to public outreach is implicit in corporate policies, facility documents and in facility actions (see attached descriptive documents and Section D). We will be working to make this commitment more explicit in the policies.

b. Planning — ☒ Yes

c. Implementation and operation — ☒ Yes

d. Checking and corrective action — ☒ Yes

e. Management review — ☒ Yes

2 Have you completed at least one EMS cycle (plan-do-check-act)? — ☒ Yes

3 Did this cycle include both an EMS and a compliance audit? — ☒ Yes

4 Have you completed an objective self-assessment or third-party assessment of your EMS? — ☒ Yes – Both

If yes, what method of EMS assessment did you use?

☒ Self-assessment

- ☐ GEMI
- ☐ CEMP
- ☒ Other - ISO 14001 self-developed checklist.

☐ Third-party assessment

- ☒ ISO 14001 Pre Certification (Preliminary)
- ☒ Other - Compliance audit and EMS gap analysis.

Revised Section
US Gen New England, Inc.
11/08/00

Section C

Tell us about your past achievements and future commitments.

Why do we need this information?

Facilities must show that they are committed to improving their environmental performance. This means that you can describe past achievements and will make future commitments.

What do you need to do?

Refer to the Environmental Performance Table in the instructions to answer questions 1 and 2.

1 Describe your past achievements for at least two environmental aspects. If you need more space than is provided, attach copies of this page.

Note to small facilities: If you qualify as a small facility as defined in the instructions, you are required to report past achievement for at least one environmental aspect.

First aspect you've selected

What aspect have you selected?	What was the previous level (2 years ago)?		What is the current level?	
	Quantity	Units	Quantity	Units
Waste Generation: reduction in volume of state-regulated oily hazardous wastes generated.	4,200	pounds/month average	2,300 prorated annual estimate for year 2000	pounds/month average

i. How is the current level an improvement over the previous level?

Reduction of over 40% in volume of oily wastes generated.

ii. How did you achieve this improvement?

Improved inspection and maintenance practices to minimize equipment leaks and drips.

Replacement of old larger oil capacity equipment and systems with newer technologies and smaller oil volumes.

Use of re-usable absorbant materials rather than rags and pads to catch and clean up drips.

Diverted specification used oils from hazardous waste streams, for beneficial use via recycling and/or burning for energy recovery.

Second aspect you've selected

What aspect have you selected?	What was the previous level (2 years ago)?		What is the current level?	
	Quantity	Units	Quantity	Units
Accidental Releases: reduction in the number and severity of accidental oil releases.	5 total, 1 state or federally reportable	number of releases	2 total, 0 state or federally reportable (year to date, 2000).	number of releases

i. How is the current level an improvement over the previous level?

For consistency of reporting across all years, data above excludes releases from formerly owned and/or non-company controlled sources onto current company-owned property. ie: National Grid USA owns and operates electrical transmission equipment on USGenNE property under easement, and may have oil releases which are beyond the control of USGenNE and PG&E NEG.

ii. How did you achieve this improvement?

Improved inspection and maintenance practices to minimize the potential for releases from oil-filled systems in proximity to water. These systems contain vegetable-based oils, which replaced petroleum-bsed oils, increasing biodegradability and reducing toxicity of any oil released (implemented prior to 2 years ago).

Implemented spill controls beyond SPCC requirements including: enhanced secondary containment devices inside facilities; additional spill response equipment (drain blockers, drum overpacks, etc) to control small releases before entering the environment; and improved materials storage practices, bringing all feasible oil storage inside facilities.

2 Select at least four environmental aspects (no more than two from any one category) from the Environmental Performance Table in the instructions and then tell us about your future commitments. If you need more space than is provided, attach copies of this section.

Note to small facilities: If you are a small facility, you are required to make commitments for at least two environmental aspects in two different categories.

First aspect you've selected

a. What is the aspect?

Potential for existing surfaces coated with lead paint in poor condition and in sensitive locations to release lead chips or dust to the environment.

EPA Aspect categories: Releases (see also Waste - releases to land; and Discharges - toxics to water)

b. Is this aspect identified as significant in your EMS? ☒ Yes ☐ No

c. What is the current level? You may choose to state this as an absolute value or in terms of units of production or output.

☒ Option A: Absolute value

☐ Option B: In terms of units of production or output

No comprehensive program for lead paint stabilization currently in place. Aproximately 14 lead removal/stabilzation projects will be completed in 2000. MF
(Quantity/Units)

(Quantity/Units)

d. What is the improvement you are committing to over the next three years? You may choose to state this as an absolute value or in terms of units of production or output.

☒ Option A: Absolute value

☐ Option B: In terms of units of production or output

Lead paint stabilization projects undertaken at a minimum of 30-35 of 166 structures and/or buildings per year over 5 years. MF
(Quantity/Units)

(Quantity/Units)

e. How will you achieve this improvement?

Facilities have been surveyed and 166 locations of lead paint in poor condition have been identified. Stabilization projects (abatement, encapsulation, and/or complete removal of painted materials as appropriate) have been prioritized and sufficient budget has been commited to implement a comprehensive multi-year program addressing lead paint throughout all Hydro facilities.

Annual progress toward this goal will be measured by the number of lead projects completed (inc. linear or square footage estimates of area stabilized). Progress will be reported in the Annual Performance Report by the number of projects completed and area stabilized at each site. MF

Second aspect you've selected

a. What is the aspect?

Reduction in volumes of oily solid debris and petroleum-based solvents generated during turbine rotor and stator cleaning and maintenance.

EPA Aspect Categories: Waste Generation - hazardous solid waste; Materials Use - hazardous materials.

b. Is this aspect identified as significant in your EMS?

☒ Yes ☐ No

c. What is the current level? You may choose to state this as an absolute value or in terms of units of production or output.

☒ Option A: Absolute value

☐ Option B: In terms of units of production

Approximately 20-30 drums of oily debris and 3-5 drums of waste solvent generated annually. MF

	or output	(Quantity/Units)
		(Quantity/Units)
d. What is the improvement you are committing to over the next three years? You may choose to state this as an absolute value or in terms of units of production or output.	☒ Option A: Absolute value ☐ Option B: In terms of units of production or output	Eliminate approximately 20-30 drums of oily debris and 3-5 drums of solvent generated per year. Implement improved cleaning methods utilizing new technology as a new standard practice on all 44 generating units. MF
		(Quantity/Units)
		(Quantity/Units)
e. How will you achieve this improvement?	Manual cleaning of turbine unit rotors and stators with solvent and rags is being replaced with a method of cryogenic cleaning which blasts dry ice pellets onto dirty rotors and stators. The dry ice fractures the oily dirt, which falls off of the equipment where it can swept or vacuumed up for proper disposal. For less dirty turbines, cleaning will be performed using air lancing and brushing off of dirt for sweeping up and proper disposal. Labor is thus significantly reduced, and oily rags and solvent formerly used for manual cleaning of rotors and stators are eliminated. Annual progress toward this goal will be measured by the number of generating units cleaned without oily debris and solvent generated. Progress will be reported in the Annual Performance Report by number of units cleaned at each site. MF	

Third aspect you've selected

a. What is the aspect?	Energy Use - reduce houseload electrical use at hydro facilities.	
b. Is this aspect identified as significant in your EMS?	☒ Yes ☐ No	
c. What is the current level? You may choose to state this as an absolute value or in terms of units of production or output.	☒ Option A: Absolute value	12,000 MWH/year (10 yr average, all locations combined.
	☐ Option B: In terms of units of production or output	(Quantity/Units)
		(Quantity/Units)
d. What is the improvement you are committing to over the next three years? You may choose to state this as an absolute value or in terms of units of production or output.	☒ Option A: Absolute value	Goal is to identify opportunities to reduce total houseload electrical usage by 5 to10 % overall.
	☐ Option B: In terms of units of production or output	(Quantity/Units)
		(Quantity/Units)
e. How will you achieve this improvement?	Facility-specific end use energy usage will be surveyed. Energy efficiency improvements will be evaluated and recommended in the areas of: lighting, domestic water heating, pumps and motors. In addition, usage patterns and employee behaviors will be reviewed for improvements leading toward additional energy conservation. Annual progress toward this goal will be measured by calculated or metered reductions in location-specific kWh used. Progress will be reported in the Annual Performance Report as estimated annual kWh savings at each site. MF	

Fourth aspect you've selected

a. What is the aspect?	Materials Use - Recycled materials purchasing and use.	
b. Is this aspect identified as significant in your EMS?	☒ Yes ☐ No	
c. What is the current level? You may choose to state this as an absolute value or in terms of units of production or output.	☒ Option A: Absolute value	Current annual purchases of virgin paper products at all sites combined is 550 reams (55 cases) of white paper, 1248 packs (78 cases) of C-fold towels, and 1440 rolls (15 cases) of bath tissue. MF
	☐ Option B: In terms of units of production or output	

(Quantity/Units)

(Quantity/Units)

d. What is the improvement you are committing to over the next three years? You may choose to state this as an absolute value or in terms of units of production or output.

☒ Option A: Absolute value

☐ Option B: In terms of units of production or output

Goal is 100% replacement of virgin paper products listed above, with recycled content products. MF

(Quantity/Units)

(Quantity/Units)

e. How will you achieve this improvement?

De-centralized purchasing occur at three locations. Purchasing practices will be reviewed and coordinated. Suppliers will be surveyed for availability and pricing of recycled content products (white paper, bathroom tissue, paper towels, etc.). Purchasing practices and purchase orders will be altered to specify recycled content products. Preference will be given to highest available content of post-consumer recycled fibers.

Annual progress toward this goal will be measured by the total quantity of recycled paper products purchased per year for all sites. Progress will be reported in the Annual Performance Report as total annual purchases for each product specified above, for all sites combined. MF

Section D

Tell us about your public outreach and reporting.

Why do we need this information?

Facilities must demonstrate their commitment to public outreach and performance reporting. You should have appropriate mechanisms in place to identify community concerns, to communicate with the public, and to provide information on your environmental performance.

What do you need to do?

- Describe your approach to public outreach.
- List three references who are familiar with your facility.

1 How do you identify and respond to community concerns?

USGenNE Hydro maintains a presence in 53 communities in NH, VT and MA. Hydro has 3 fulltime Government Affairs and Public Relations Representatives who are actively involved in all aspects of community outreach, and serve as the primary initial contacts for all public inquiries and concerns. Representatives routinely attend relevant community meetings, and report back any issues of concern that arise in those forums. As needed, public inquiries and concerns are routed to the Environmental Department for further reasearch, evaluation and follow-up.

Hydro is committed to thoroughly addressing and resolving public concerns through open honest communications, timely responses, and seeking win-win solutions to issues of concern.

2 How do you inform community members of important matters that affect them?

There are four Visitor Centers located throughout the Hydro region, each of which contains interactive displays designed to educate and inform the public.

The Hydro FERC relicensing processes provide on-going public forums in which to discuss facility operations, and collaborate with stakeholders on the various environmental aspects of dam, plant and water management operations.

Facility tours are offered, and routinely conducted for various audiences including school children, community groups, and emergency response services.

Hydro Environmental, Safety, PR, Government Affairs staff are actively involved in local, state and regional task forces and environmental group initiatives including, among others: UVCON (Upper Valley Compliance Officers Network), Deerfield River Watershed Initiative Team, Connecticut River Joint Commissions, the Nature Conservancy, Audobon Society.

3 How will you make the Achievement Track Annual Performance Report available to the public?

☐ Website www.

☐ Newspaper

☐ Open Houses

☒ Other

The Annual Report will be made available at a minimum, at the four public Visitor Centers located throughout the Hydro region. It will also be made available to community groups and organizations in which USGenNE Hydro maintains active participation (see section D -2 above).

PG&E National Energy Group is currently updating and revising the corporate website. Including Hydro Achievement Track Annual Reports on the website is currently being evaluated.

4 Are there any ongoing citizen suits against your facility?

☐ Yes ☒ No

If yes, describe briefly in the right-hand column.

5 List references below

	Organization	*Name*	*Phone number*
Representative of a Community/ Citizen Group	Vermont Institute of Natural Science (VINS)	Mr. Chris Rimmer, Director of Conservation Biology	(802) 457-2779
	Deerfield River Watershed Assoc.	Mr. Rol Hesselbart, Director	(413) 337-6659
State/Local Regulator	State of Vermont	Howard Dean, M.D., Governor of the State of Vermont	(802) 828-3333
Other community/local reference	Town of Littleton, NH	Mr. Don Jutton, Town Manager	(603) 444-3996 x 14

Section E

Application and Participation Statement

On behalf of PG&E National Energy Group US Gen New England - Hydro
[my facility],

I certify that

I have read and agree to the terms and conditions, as specified in the *National Environmental Achievement Track Program Description* and in the *Application Instructions*;

I have personally examined and am familiar with the information contained in this Application (including, if attached, the Environmental Requirements Checklist). The information contained in this Application is, to the best of my knowledge and based on reasonable inquiry, true, accurate, and complete, and I have no reason to believe the facility would not meet all program requirements;

My facility has an environmental management system (EMS), as defined in the Achievement Track EMS requirements, including systems to maintain compliance with all applicable federal, state, tribal, and local environmental requirements, in place at the facility, and the EMS will be maintained for the duration of the facility's participation in the program;

My facility has conducted an objective assessment of its compliance with all applicable federal, state, tribal, and local environmental requirements, and the facility has corrected all identified instances of potential or actual noncompliance;

Based on the foregoing compliance assessment and subsequent corrective actions (if any were necessary), my facility is, to the best of my knowledge and based on reasonable inquiry, currently in compliance with applicable federal, state, tribal, and local environmental requirements.

I agree that EPA's decision whether to accept participants into or remove them from the National Environmental Achievement Track is wholly discretionary, and I waive any right that may exist under any law to challenge EPA's acceptance or removal decision.

I am the senior facility manager and fully authorized to execute this statement on behalf of the corporation or other legal entity whose facility is applying to this program.

Signature/Date Michael G. Kline

Printed Name/Title Michael G. Kline, Managing Director of Hydro Generation

Facility Name PG+E National Energy Group
US Gen New England, Inc.

Facility Street Address 46 Centerra Parkway Suite 100
Lebanon, NH 03766

Facility ID Numbers Attached

National Environmental Achievement Track

Environmental Requirements Checklist

The following Checklist is provided to assist facilities in answering Section A, "Tell us about your facility," Question 6. The Checklist is given to help facilities identify the major federal, state, tribal, and local environmental requirements applicable at their facilities. The Checklist is not intended to be an exhaustive list of all environmental requirements that may be applicable at an individual facility.

If you use this Checklist and choose to submit it with your application, fill in your facility information below and enclose the completed Checklist with your application (see instructions).

Facility Name:	**PG&E National Energy Group – USGenNE Hydro Generation**
Facility Location:	**46 Centerra Parkway, Suite 100 Lebanon, NH 03766**
Facility ID Number(s): ***(attach additional sheets if necessary)***	**attached**

Air Pollution Regulations

		Check All That Apply
1.	National Emission Standards for Hazardous Air Pollutants (40 CFR 61)	
2.	Permits and Registration of Air Pollution Sources	
3.	General Emission Standards, Prohibitions and Restrictions	X
4.	Control of Incinerators	
5.	Process Industry Emission Standards	
6.	Control of Fuel Burning Equipment	
7.	Control of VOCs	
8.	Sampling, Testing and Reporting	
9.	Visible Emissions Standards	
10.	Control of Fugitive Dust	X
11.	Toxic Air Pollutants Control	
12.	Vehicle Emissions Inspections and Testing	X

Other Federal, State, Tribal or Local Air Pollution Regulations Not Listed Above (identify)

13.	Stage I, Stage II Vapor Recovery Requirements for Gasoline Dispensing	X
14.		

Hazardous Waste Management Regulations

1. Identification and Listing of Hazardous Waste (40 CFR 261)	
- Characteristic Waste	X
- Listed Waste	X
2. Standards Applicable to Generators of Hazardous Waste (40 CFR 262)	
- Manifesting	X
- Pre-transport requirements	X
- Record keeping/reporting	X
3. Standards Applicable to Transporters of Hazardous Waste (40 CFR 263)	
- Transfer facility requirements	
- Manifest system and record-keeping	
- Hazardous waste discharges	
4. Standards for Owners and Operators of TSD Facilities (40 CFR 264)	
- General facility standards	
- Preparedness and prevention	
- Contingency plan and emergency procedures	
- Manifest system, Record keeping and reporting	
- Groundwater protection	
- Financial requirements	
- Use and management of containers	
- Tanks	
- Waste piles	
- Land treatment	
- Incinerators	
5. Interim Status Standards for TSD Owners and Operators (40 CFR 265)	
6. Interim Standards for Owners and Operators of New Hazardous Waste Land Disposal Facilities (40 CFR 267)	
7. Administered Permit Program (Part B) (40 CFR 270)	

Other Federal, State, Tribal or Local Hazardous Waste Management Regulations Not Listed Above (identify)

8. NH, VT and MA State Hazardous Waste Regulations for Generators	X
9.	

Hazardous Materials Management

1. Control of Pollution by Oil and Hazardous Substances (33 CFR 153)	X
2. Designation of Reportable Quantities and Notification of Hazardous Materials Spill (40 CFR 302)	X
3. Hazardous Materials Transportation Regulations (49 CFR 172-173)	X
4. Worker Right-to-Know Regulations (29 CFR 1910.1200)	X

5.	Community Right-to-Know Regulations (40 CFR 350-372)	X

Other Federal, State, Tribal or Local Hazardous Materials Management Regulations Not Listed Above (identify)

6.	VT Community Right to Know Regulations	X
7.		

Solid Waste Management

1.	Criteria for Classification of Solid Waste Disposal Facilities and Practices (40 CFR 257)	
2.	Permit Requirements for Solid Waste Disposal Facilities	
3.	Installation of Systems of Refuse Disposal	
4.	Solid Waste Storage and Removal Requirements	X
5.	Disposal Requirements for Special Wastes	X

Other Federal, State, Tribal or Local Solid Waste Management Regulations Not Listed Above (identify)

6.	VT, NH and MA State Solid Waste Regulations	X
7.		

Water Pollution Control Requirements

1.	Oil Spill Prevention Control and Countermeasures (SPCC) (40 CFR 112)	X
2.	Designation of Hazardous Substances (40 CFR 116)	X
3.	Determination of Reportable Quantities for Hazardous Substances (40 CFR 117)	X
4.	NPDES Permit Requirements (40 CFR 122)	X
5.	Toxic Pollutant Effluent Standards (40 CFR 129)	
6.	General Pretreatment Regulations for Existing and New Sources (40 CFR 403)	
7.	Organic Chemicals Manufacturing Point Source Effluent Guidelines and Standards (40 CFR 414)	
8.	Inorganic Chemicals Manufacturing Point Source Effluent Guidelines and Standards (40 CFR 415)	
9.	Plastics and Synthetics Point Source Effluent Guidelines and Standards (40 CFR 416)	
10.	Water Quality Standards	X
11.	Effluent Limitations for Direct Dischargers	X
12.	Permit Monitoring/Reporting Requirements	X

13.	Classifications and Certifications of Operators and Superintendents of Industrial Wastewater Plants	
14.	Collection, Handling, Processing of Sewage Sludge	
15.	Oil Discharge Containment, Control and Cleanup	X
16.	Standards Applicable to Indirect Discharges (Pretreatment)	

Other Federal, State, Tribal or Local Water Pollution Control Regulations Not Listed Above (identify)

17.		
18.		

Drinking Water Regulations

1.	Underground Injection and Control Regulations, Crieria and Standards (40 CFR 144, 146)	
2.	National Primary Drinking Water Standards (40 CFR 141)	X
3.	Community Water Systems, Monitoring and Reporting Requirements (40 CFR 141)	X
4.	Permit Requirements for Appropriation/Use of Water from Surface or Subsurface Sources	
5.	Underground Injection Control Requirements	
6.	Monitoring, Reporting and Record keeping Requirements for Community Water Systems	X

Other Federal, State, Tribal or Local Drinking Water Regulations Not Listed Above(identify)

7.		
8.		

Toxic Substances

1.	Manufacture and Import of Chemicals, Record keeping and Reporting Requirements (40 CFR 704)	
2.	Import and Export of Chemicals (40 CFR 707)	
3.	Chemical Substances Inventory Reporting Requirements (40 CFR 710)	
4.	Chemical Information Rules (40 CFR 712)	
5.	Health and Safety Data Reporting (40 CFR 716)	
6.	Pre-Manufacture Notifications (40 CFR 720)	
7.	PCB Distribution Use, Storage and Disposal (40 CFR 761)	X
8.	Regulations on Use of Fully Halogenated Chlorofluoroalkanes (40 CFR 762)	

9.	**Storage and Disposal of Waste Material Containing TCDD (40 CFR 775)**	

Other Federal, State, Tribal or Local Toxic Substances Regulations Not Listed Above (identify)

10.		
11.		

Pesticide Regulations

	FIFRA Pesticide Use Classification (40 CFR 162)	X
2.	**Procedures for Disposal and Storage of Pesticides and Containers (40 CFR 165)**	X
3.	**Certification of Pesticide Applications (40 CFR 171)**	X
4.	**Pesticide Licensing Requirements**	X
5.	**Labeling of Pesticides**	X
6.	**Pesticide Sales, Permits, Records, Application and Disposal Requirements**	X
7.	**Disposal of Pesticide Containers**	X
8.	**Restricted Use and Prohibited Pesticides**	X

Other Federal, State, Tribal or Local Pesticides Regulations Not Listed Above (identify)

9.	***Note: herbicide use by contractors only***	
10.		

Environmental Clean-Up, Restoration, Corrective Action

Comprehensive Environmental Response, Compensation and Liability Act (Superfund) (identify)

2.	**RCRA Corrective Action (identify)**	

Other Federal, State, Tribal or Local Environmental Clean-Up, Restoration, Corrective Action Regulations Not Listed Above (identify)

3.	**VT, NH and MA State Oil Cleanup Regulations**	X
4.		

USGen New England, Inc. Hydro Generation

Facility Name	EPA ID #	Location	Town	County	State
Moore	NHD986469542	off Route 135 (Exit 44 I-93)	Littleton	Grafton	NH
Comerford	NHD120299888	450 Dam Road	Monroe	Grafton	NH
McIndoes	NHD510003742	off Route 135 (off Plains Road)	Monroe	Grafton	NH
Wilder	VTR000012799	351 Wilder Dam Rd	Wilder	Windsor	VT
Bellows Falls	VTR000012757	12 Mill St	Bellows Falls	Windham	VT
Vernon	VTR000012716	152 Governor Hunt Rd	Vernon	Windham	VT
Harriman	VTR000012021	1096 Harriman Station Rd.	Readsboro	Windham	VT
Searsburg	VTR000006064	133 NEP Road	Searsburg	Bennington	VT
Sherman	MV6034439200	off Yankee Road	Rowe	Franklin	MA
Bear Swamp, including Fife Brook	MAR000011106	River Road	Rowe	Franklin (Fife Bk is in Berkshire)	MA
Deerfield No. 5 Station	MV6034439200	River Road	Florida	Berkshire	MA
Deerfield No. 4 Station	MV6034439200	Creamery Ave	Buckland	Franklin	MA
Buckland (Shelburne) complex including Deerfield No. 3 Station	MAR000011056	71 Conway Street	Buckland	Frankln	MA
Deerfield No. 2 Station	MV6034439200	off Conway Street	Conway	Franklin	MA

For all facilities: Manifest, BOL, and Billing address is:

stationlist.doc
02/10/00

USGen New England, Inc.
Attn: Maryalice Fischer
46 Centerra Parkway
Lebanon, NH 03766
(603) 653-9233 voicemail
(603) 225-5528 Concord, NH

PG&E National
Energy Group

4 Park Street
Concord, NH 03301-6313

603.225.5528
Fax: 603.225.3260

November 8, 2000

The Performance Track Information Center
c/o Industrial Economics Incorporated
2067 Massachusetts Avenue
Cambridge, MA 02140

RE: **SECOND Submittal of Revised Pages** for National Environmental Achievement Track Application Package

Dear Sir or Madam:

Yesterday I received a request from Ms. Jean Holbrook at EPA New England for additional information and clarification relating to our facility and our future environmental commitments. In response to that request I am submitting an amended application consisting of this cover letter and revised pages for the PG&E National Energy Group's USGen New England, Inc. Hydro Generation NEAT application. I have summarized all changes and corrections below:

1. In the original application we inadvertently excluded the following locations related to our facility, not adjacent to the previously listed sites. Each of these locations have minimal environmental impacts, however I have listed them here for the sake of completeness. **Please also note that all USGen New England, Inc. locations were purchased from New England Power Company on September 1, 1998.**

   First and Second Connecticut Lakes Dams – Used Oil Marketer with EPA ID # NH500022587
   Route 3, RFD 1 Box 382 — small sites utilized for water storage with 1 garage and 1 office.
   Pittsburg, NH 03592

   Somerset Dam – no EPA registration, small site with one structure, utilized only for water storage
   Somerset Road
   Somerset, VT

   North Walpole Office – no EPA registration, location owned by USGenNE and utilized as offices
   2 Killeen Street
   North Walpole, NH 03609

   Connecticut River Office – no EPA registration, location owned by USGenNE, utilized as offices
   249 North Main Street
   West Lebanon, NH 03784

   Concord Office – no EPA registration, location leased by USGenNE and utilized as offices
   4 Park Street, Suite 402
   Concord, NH 03301

   Monroe Bridge Office – no EPA registration, location leased by USGenNE and utilized as offices
   3A School Street
   Monroe Bridge, MA 01350

2. NEAT APPLICATION SECTION C.2: FUTURE COMMITMENT #1 - LEAD PAINT STABILIZATION

Per my previous application revision and letter dated November 6, 2000 we have identified as a baseline 166 locations with areas and/or structures having lead paint in poor condition. Current activity has been zero projects for lead paint removal, until this year (2000) during which we have scheduled lead projects at approximately 14 locations. We are committing to lead paint stabilization and/or removal projects at 30 to 35 locations per year for the next three to five years. **Annual progress toward this goal will be tracked and reported in the Annual Performance Report by the number of projects completed and total area (square footage or linear footage) stabilized at each site.**

3. NEAT APPLICATION SECTION C.3: FUTURE COMMITMENT #2 - REDUCTION OF OILY SOLID DEBRIS AND SOLVENT USE IN GENERATOR UNIT CLEANING

There are a total of 44 hydro generating units located in 15 generating locations throughout USGenNE - Hydro. Historically, each unit has undergone manual rotor and stator cleaning approximately once every 3 to 4 years. Units are of differing sizes and design, and therefore require different levels and frequencies of cleaning. The estimated total baseline waste generation has been approximately 20 to 30 drums of oily debris and 3 to 5 drums of solvent generated per year from all sites combined through this activity. We are committing to eliminating all oily debris and solvent generated through this rotor and stator cleaning activity. **Annual progress toward this goal will be tracked and reported in the Annual Performance Report by the number of units cleaned utilizing the new cryogenic and air lancing methods at each applicable site (generating locations only).**

4. NEAT APPLICATION SECTION C.4: FUTURE COMMITMENT #3 – ENERGY USE

There are multiple buildings, sites and locations for USGenNE Hydro, most having some level of energy use reduction potential. As stated in our original application, the baseline annual electrical usage is approximately 12,000 MWH for all sites combined. We are committing to seeking opportunities for energy use reduction of 5 to 10 % over three to five years. **Annual progress toward this goal will be tracked and reported in the Annual Performance Report by estimated and/or calculated energy savings at each site.**

5. NEAT APPLICATION SECTION C.5: FUTURE COMMITMENT #4 – MATERIALS USE, RECYCLED PAPER PURCHASING

Purchasing is done from three office-based locations within USGenNE – Hydro. Products are then internally distributed to all applicable sites on an as needed basis. Total annual baseline virgin paper product purchases are estimated as follows:

White paper (copier, printer, fax):	550 reams/year (55 cases at 10 reams/case, 500 sheets/ream)
C-Fold paper towels:	1248 packs/year (78 cases at 16 packs/case, 120 sheets/pack)
Bathroom tissue:	1440 rolls/year (15 cases at 96 rolls per case)

We are committing to replacement of 100% of these virgin products with recycled content products. **Annual progress toward this goal will be tracked and reported in the Annual Performance Report by the <u>total quantity of recycled paper products purchased within the Hydro organization.</u>**

I hope that this amendment provides sufficient clarification for our NEAT application. Please contact me at (603) 653-9233 if you wish to discuss our application or our hydroelectric operations in further detail.

Sincerely,

Maryalice Fischer

Maryalice Fischer

Hydro Environmental Manager
PG&E National Energy Group, USGen New England, Inc.
46 Centerra Parkway, Suite 100
Lebanon, NH 03766

enclosure

cc: A. Vogel-Marr, PG&E National Energy Group
J. Holbrook, EPA New England