Overview

• Company Background
• Project Background
• Program Drivers
• Managing Construction Compliance
• Program Implementation
• Benefits
• Conclusions
PSEG Power LLC is a fortune 300 company that owns and operates a portfolio of natural gas, coal, and oil-fired electric generating units in NJ, NY, CT, PA and now MD totaling around 15,000 MW.

Consisting of:
15 Fossil Generation Facilities
3 Nuclear Generation Units
3 Natural Gas Plants Currently in Construction (MD, NJ, and CT)

- Engineering, Planning and Environmental
- Established in 1946
- Over 500 personnel
- 20 Offices
Project Background

- The PSEG Keys Energy Center (Project) is a combined cycle plant that will bring 755 megawatts of highly efficient generating capacity to the state of Maryland supporting system flexibility and reliability
- 7.9 miles of 20” natural gas pipeline through sensitive environmental features
- 1.93 miles protected by timber mats during construction
Program Drivers

Regulatory Drivers

- Maryland Department of the Environment Nontidal Wetlands and Waterways Permit, "Employment of an Independent Environmental Monitor who will provide full time over-sight of construction, through final stabilization."

Business Drivers

- Environmental Stewardship
- It's the RIGHT thing to DO!

Project Drivers

Natural Resource Impacts

- 9.32 acres of forested non-tidal wetlands converted to emergent nontidal wetlands
- 0.41 acres of scrub-shrub wetland converted to emergent nontidal wetland
- 3 HDD's (1 at Wolf Den Branch, 1 at Zekiah Swamp Run, 1 at Wetland KS-WV)
- Multiple open cut stream crossings in Tier II Watersheds

Time of Year Restrictions

- 12/15/2015 - 06/15/2016 - Bald eagle nesting season
- 02/15/2015 - 06/15/2016 - In-stream work restriction (applied to HDD as well)
- 04/15/2016 - 08/31/2016 - Northern Long-Eared Bat (NLEB) tree clearing restriction
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Managing Construction Compliance

A Day in the Life of an IEM

- Present & Construction Document Review
- Coordination with Project Teams
- Monitor of Construction Management Tools
- Assist with construction processes, process, and project
- Monitor compliance and enforcement of environmental regulations
- Submit reports to regulatory authorities
- Ensure compliance with permit conditions
- Assist in the development of environmental plans

What an IEM does not do:
- Make or approve design changes
- Inspect and approve non-environmental work (forestry cutting, structures, fills, etc.)
- Direct the contractor
- Approve contractor materials, quantities, etc.

Independent Environmental Monitor

Defining the Independent Environmental Monitor

- Independent - no affiliation with the project designer or contractor
- Environmental - clear understanding of environmental commitments, permit conditions and the design plans relevant to environmental requirements.
- Monitor - verifies that design and construction is in compliance with the project's authorizations

The Independent Environmental Monitor serves as the "eyes and ears" of the regulatory agencies during all phases of construction.

Monitoring and Tracking Environmental Compliance (MTEC)
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A Day in the Life of an IEM

Permit & Construction Document Review

- Pre-construction plan review
- Ongoing plan review during construction
- Focus is on avoidance and minimization of resource impacts
- Ensure adequate E&S controls
- Sequence of construction
- Limits of disturbance
- Overall constructability

Coordination with Project Team

- Member of Construction Management Team
- Attend construction project meetings
- Documents construction compliance
- Provide updates at team meetings throughout construction
- Makes recommendations to avoid compliance issues
- Make recommendations to further avoid and minimize impacts

Typical Environmental Issues

- Truck Washing
- Permitted Impacts
- Wetlands / Wetland Buffers
- Stream Crossings
- Tree Clearing and Grubbing
- E&S Controls
- Steep Slopes
- Mat Placement
- Forests/Tree Preservation
- Threatened Species
- Cultural Resources
- Floodplains
- Limits of Disturbance
- Critical Areas
- Time of Year Restrictions

What an IEM does not do!

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Monitoring and Tracking Environmental Compliance (MTEC)

Documentation
- Photos
- Real Time
- Demonstrates compliance
- Relates to other data

Photographs

Approved Plans

Compliance Issues
Environmental Compliance Training

- Development of Environmental Compliance Training (Owner Staff, Contractors, Etc.)
Program Implementation

- Coordination with Agency Inspections (WSSC, DPIE, MDE)
- Reporting to MDE and Corps on HDD Inadvertent Release in uplands
- Reporting to MDE on E&SC discharge into wetland during trenching operations
- Daily report notifications to regulating agencies and invested parties
- No Agency Notice of Violations or Non-Compliances issued prior to or during construction
Benefits

- Builds solid relationships between regulatory agencies and company
- Builds relationships between construction management, engineering, and monitors
- Reduction of risks of non-compliance, fines, delays,
- Focuses on permit requirements and permit conditions
- Defines roles and responsibilities
- Documentation
- Daily focus on environmental concerns
Conclusions

• Reduces Risk of Non-compliances
• Standardizes Expectations
• Documents Compliance
• Strengthens Regulatory Relationships
Thank You

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