MMWEC
MASSACHUSETTS MUNICIPAL WHOLESALE ELECTRIC COMPANY
Public Energy Partners

March 5, 2020

Michael W. McClean
Supervisory Pesticide Inspector
Rights of Way Coordinator
Massachusetts Department of Agricultural Resources
Pesticide Bureau
251 Causeway Street, Suite 500
Boston, MA 02114-2151

Re: Yearly Operational Plan – Massachusetts Municipal Wholesale Electric Company

Mr. McClean:

Attached please find an electronic version of the 2020 Yearly Operational Plan (YOP) for the 5.2 mile, 345 KV transmission line owned and operated by the Massachusetts Municipal Wholesale Electric Company (MMWEC) in Ludlow Massachusetts.

A copy of the plan is being provided to the Natural Heritage and Endangered Species Program for their review.

Please place a notice in the Environmental Monitor and forward a copy of the notice to my attention so that I can forward it to the appropriate officials in the affected towns.

Sincerely,

Louis Gilli

Louis Gilli
EH&S Engineer

Cc: B. Quinn – Director of Engineering and Generating Assets

Yearly Operational Plan (YOP)

Transmission Line Vegetation Management

Massachusetts Municipal Wholesale Electric Company

2020

Prepared By:

Louis Gilli
Environmental Health & Safety Engineer
Engineering Services Department
327 Moody Street
Ludlow, Massachusetts 01056
(413) 308-1259
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Yearly Operational Plan

The purpose of 333 CMR 11.00, Rights of Way Management, is to promote the implementation of integrated pest management techniques and to establish standards, requirements, and procedures necessary to minimize the risk of unreasonable adverse effects on human health and the environment associated with the use of herbicides to maintain streets, road, sidewalks and paths. These regulations establish procedures that guarantee ample opportunity for public and municipal agency review and input on the right-of-way maintenance plans.

A yearly operational plan (YOP) must be submitted to the Department of Agricultural Resources every year herbicides are intended for use to maintain rights-of-way. The YOP provides a detailed program for vegetation management for the year. A five year Vegetation Management Plan (VMP) covering the period from 2016 – 2020 was approved by the Department in 2016 and is available for review at the office of the Massachusetts Municipal Wholesale Electric Company (MMWEC), Board of Health, Conservation Commission, and Ludlow Selectman's Office.

Upon receipt of this YOP, the Department publishes a notice in the Environmental Monitor. MMWEC must provide a copy of the proposed YOP and Environmental Monitor notice to the Board of Health, Conservation Commission, and the Selectman's Office for the Towns of Ludlow, Hancock and Lanesborough in which the proposed herbicide treatment is proposed. The Department allows a 45-day comment period on the proposed YOP beginning with the publication of the notice and receipt of the YOP and Environmental Monitor notice by the Town.

Public notification of herbicide application to the rights of way is made at least 21 days in advance of the treatment by a separate notice. Notice is made to the Department of Agricultural Resources, Selectman's Office, Board of Health, and the Conservation Commissions in the Towns of Ludlow, Hancock and Lanesborough.

Any comments on this YOP should be made to the person designated herein as the person supervising the YOP or the person performing the treatment.

MMWEC Yearly Operational Plan

This Yearly Operational Plan, pursuant to Rights-of-Way Management Regulations (333 CMR 11.00), has been adopted by the following transmission line vegetation management program in the Towns of Ludlow, Hancock and Lanesborough, Massachusetts. The undersigned hereby acknowledges that the conditions of the Yearly Operational Plan will be adopted and complied with.

Municipality:	Towns of Ludlow, Hancock and Lanesborough Massachusetts
Name:	Louis Gilli
Agency:	MMWEC
Address:	327 Moody Street, Ludlow MA 01056
Telephone	(413) 308-1259
Email:	lgilli@mmwec.org
Signature:	_____
Date:	_____

Individual Supervising YOP

Name and Title:	Louis Gilli, Environmental Health & Safety Engineer
Department:	Engineering Services
Address:	MMWEC, 327 Moody Street, Ludlow, MA
Telephone:	(413) 308-1259
Signature:	_____

Contractor Performing Herbicide Treatment

A licensed herbicide applicator under contract to MMWEC will perform the herbicide treatment. Applicators are certified by the Massachusetts Department of Agricultural Resources in the applicator category:

Certified Applicator: License Number:	Matthew Tolppa MA CAT 40-38087
Certified Applicator: License Number:	Jason Savoy MA applicator License 37089
Company or Department:	Integrated Vegetation Services
Address:	73 J Street Athol, MA 01331
Telephone Number:	978-424-5713
Email:	mtolppa@integratedvegetationservices.com

Yearly Operational Plan

The following information is provided as details of the YOP for the MMWEC Transmission Line Rights of Way in accordance with the requirements of 333 CMR 11.06 (2):

Herbicides Proposed

The herbicides proposed for use in calendar year 2020 are:

Herbicide	EPA Reg #	Rate
Rodeo Concentrate	62719-324	4%
Arsenal Powerline	241-431	0.25%
Escort XP	352-439	1.5oz/100 gal
Carrier/Adjuvant		
LI 700		0.5 quart per 100 gal

Complete information on these products is attached, including the (**S**afety **D**ata **S**heets) for the product. The herbicide fact sheet for the above listed herbicides are attached to and made part of this YOP.

Herbicide Application Techniques and Alternative Control Procedures

The herbicide(s) will be applied in accordance with the instructions in the attached manufacturer's information and as described below. Alternative control procedures, applicable at the designated "No Spray Zones" will consist of hand cutting, mowing, or selective trimming as necessary.

Selected Treatment Method for this YOP

The selected method of herbicide treatment for this YOP is the Selective Foliar method.

Description: A herbicide mixture is applied to fully developed leaves, stems, needles or blades of individual, target species. The herbicide concentrate is usually mixed or diluted with water and applied as a uniform spray over the plant's foliage. Two types of equipment for foliar treatments are used: back pack and vehicle mounted. Both treatments use low pressure, below 60 pounds per square inch (psi) at the nozzle, for applications. This technique is generally the most economical and effective method, particularly in medium and high brush density situations and to control noxious and poisonous vegetation that presents a hazard to inspection and maintenance crews. The application period usually extends from early June through the beginning of leaf abscission in the fall when not restricted by regulations.

Backpack Foliar Techniques utilize hand-operated pumps or motorized, backpack sprayers. The motorized, backpack sprayer produces an air current that delivers the herbicide mixture in small droplets from the portable three to five gallon spray tank to the target vegetation. Both techniques only require the applicator to dampen or lightly wet the target leaf area not to the point of runoff. This minimizes the amount of excess herbicide drip from target species onto desirable ground cover. Low volume applications also eliminate the need to bring heavy equipment on the ROW for the transportation of large quantities of herbicide solution.

Vehicle Mounted Techniques generally utilizes a 100-500 gallon hydraulic sprayer mounted on a truck, tractor or tracked vehicle equipped with hand-held spray guns. The herbicide mixture is directed at specific vegetation or broadcast for uniform coverage. Specially designed showerhead type nozzles reduce spray volumes and limit droplet fines thus reducing the potential for spray drift off-target. These nozzles deliver effective spray coverage at relatively low spray pressures of sixty psi and less. This technique is capable of delivering uniform, penetrating spray coverage to dense, tall, target vegetation such as Phragmites and Japanese Knotweed. It is particularly useful for sites where total weed control or pre-emergent herbicide applications are required for fire safety, such as at pumping stations and valve sites or for initial treatment of invasive plants.

All equipment used for vegetation management programs must be maintained in good working condition, and should be of adequate design and ability to produce the professional quality of work that the Town requires. Because the Town recognizes the vast variety and performance of herbicide application equipment, dictating how that equipment should be calibrated to deliver precise amounts of herbicide to effectively control a host of vegetation conditions is literally impossible. Therefore, the Town insists that the contractor provide the most appropriate application equipment, calibrated to effectively and legally control target vegetation.

Both the Contractor and MMWEC are responsible to insure that vegetation management activities are conducted in a professional, safe, efficient manner, with special attention directed towards minimal environmental impact. The contractor is qualified, licensed and certified to apply herbicides. "Qualified" means those personnel who have been trained to recognize and identify target and non-target vegetation and are knowledgeable in the safe and proper use of both mechanical and chemical vegetation management techniques. All personnel applying herbicides in Massachusetts must be licensed in the Commonwealth and must work under the on-site supervision of a certified applicator. All contract personnel will also follow all label instructions regarding Personal Protective Equipment (PPE).

MMWEC will rely on the independent contractor listed in the YOP for vegetation management applications and requires, in a contractual agreement, that contractors comply with all applicable federal and state laws and regulations. These include, but are not limited to, applicable OSHA, FIFRA and DOT regulations, 333 CMR 1-15.00,

Rights-of-Way Management, Chapter 132B, Chapter 85 of the Acts of 2000 (see Appendix IV) and 321 CMR 10.00 as managed by NHESP.

Herbicides will only be applied in a safe and judicious manner, in compliance with all-applicable State and Federal pesticide regulations.

Applicators will at all times exercise good judgment and common sense during herbicide treatment activities, and will immediately cease operations if adverse conditions or other circumstances warrant.

Herbicides will NOT be applied during the following adverse weather conditions:

A. During high wind velocity, per 333 CMR 11.03
B. Foliar applications during periods of dense fog, or moderate to heavy rainfall
C. Foliar applications of volatile herbicides during periods of high temperatures (90 plus degrees Fahrenheit) and low humidity
D. Cut Stump applications when deep snow (i.e. 6" plus or ice frozen on stem or stump) prevents adequate coverage of target plants to facilitate acceptable control

The contractors or a representative of MMWEC must complete daily vegetation management reports that include:

A. Date, name and address of vegetation management contractor(s)
B. Identification of site or work area
C. List of crew members
D. Type of equipment and hours used, both mechanical and chemical
E. Method of application and description of target vegetation
F. Amount, concentration, product name of herbicide(s), adjuvants, and dilutants (EPA registration numbers must be on file)
G. Weather conditions
H. Notation of any unusual conditions or incidents, including public inquiries
I. Recording and/or verification of sensitive areas on ROW maps

Identification of Target Vegetation

The target vegetation for this YOP will be all non-desirable, tall growing species of vegetation that could reduce line clearances below required minimum distance for safe and reliable electric transmission.

Vegetation management crews will exercise care to insure that low-growing desirable vegetation and other non-target organisms are not unreasonably affected by the application of herbicides.

Description of Methods Used to Flag or Otherwise Designate Sensitive Areas

The sensitive areas detailed herein are easily recognizable in the field as described and will be marked with an orange painted line in the street.

For the 2020 YOP, it is the intention of MMWEC to spray target species where permitted along the entire 5.2 mile transmission line in Ludlow and the 23 kV collector circuit for the Berkshire Wind Power Project in the Towns of Hancock and Lanesborough, MA. The YOP maps identify the Sensitive Areas where "No Spray Zones" have been established, all of which are clearly identified by structures, houses, or other field methods.

With the assistance of the contractor, sensitive areas will be identified and marked along the ROW prior to any herbicide application.

On the MMWEC transmission line in Ludlow, MA, potential sensitive habitats were identified by the NHESP in 2 locations. These areas were surveyed for the Climbing Fern (*Lygodium palmatum*) and the Blue Spotted Salamander (*Ambystoma laterale*) in accordance with NHESP requirements and protocols in early 2013 by a certified biologist and it was determined that there were no occurrences of the species in question. Upon contacting NHESP regarding the need for a plant survey for this year's spraying they said a survey would not be necessary based on past survey results. As of 2020 Oliver Map system the MMWEC transmission line does not contain NHESP Estimated Habitat of Endangered Species, NHESP Estimated Habitat of Rare Species, and no ACEA's. This area will not be sprayed in 2020 unless approved by NHESP. NHESP said no MESA review is required.

Sensitive Area Restrictions

333 CMR 11.04

CONTROL STRATEGIES FOR SENSITIVE AREAS

Sensitive Area	Minimum Buffer Zone (feet)	Control Method	Restriction Code
Public Ground Water Supplies	400'	Mechanical Only	None
Primary Recharge Area	Designated buffer zone or 1/2 mile radius	Mechanical, Recommended Herbicides*	1
Public Surface Water Supplies (Class A & Class B)	100'	Mechanical Only	None
	100'-400'	Recommended Herbicides	1
Tributary to Class A Water Source, within 400' upstream of water source	100'	Mechanical Only	None
	100'-400'	Recommended Herbicides	1
Tributary to Class A Water Source, greater than 400' upstream of water source	10'	Mechanical Only	None
	10'-200'	Recommended Herbicides	1
Class B Drinking Water Intake, within 400' upstream of intake	100'	Mechanical Only	None
	100'-200'	Recommended Herbicides	1
Private Drinking Water Supplies	50'	Mechanical Only	None
	50'-100'	Recommended Herbicides	2
Surface Waters	10'	Mechanical Only	None
	10'-100'	Recommended Herbicides	2
Rivers	10' from mean annual high water line	Mechanical Only	None
	10'-200'	Recommended Herbicides	2
Wetlands	100' (treatment in wetlands permitted up to 10' of standing water)*+	Low-pressure Foliar, CST, Basal Recommended Herbicides	1
Habitated Areas	100' (for high-pressure foliar only)	Recommended Herbicides	2
Agricultural Area (Crops, Fruits, Pastures)	100' (for high-pressure foliar only)	Recommended Herbicides	2
Certified Vernal Pools	10'	Mechanical Only	None
Certified Vernal Pool Habitat	10'-outer boundary of habitat	As recommended by NHESP in their permit process, no treatment without written permission	
Priority Habitat	As recommended by NHESP in their permit process, no treatment without written permission		

Restriction Code "1": A minimum of twenty-four months shall elapse between applications
Code "2": A minimum of twelve months shall elapse between applications
*Massachusetts recommended herbicides for sensitive sites
+Per "The Wetlands Impact Study," 10/1995 (see Appendix III)

Procedures and Locations for Handling, Mixing and Loading of Herbicide Concentrates

The herbicide will be mixed in a controlled environment prior to entering the right of way. Should mixing become necessary while the contractor is in the right of way, all mixing shall be performed on level ground in the access road away from wetlands and other sensitive areas.

Although it is expected that all the mixed herbicide will be used, any remaining will be safely removed by the contractor at the end of each days work and stored by the contractor in accordance with manufacturer's instructions. The absorbent product "Speedi-Dri" or equivalent will be available for use at the locations of application. If there is a leak in the hose, the pump will be immediately shutoff and removed from the work area in a suitable container for repair. Equipment used will be washed in accordance with all applicable regulations at the contractor's place of business.

Herbicides will be handled and applied only in accordance with the label instructions. Contractors will strictly adhere to all mandated safety precautions directed towards the public, the applicator and the environment.

Remedial Plan to Address Spills and Related Accidents

All mixing and loading of herbicides will be conducted at the central facility where the herbicides are stored. Only the amount of herbicide necessary to carry out the vegetation control, based on the monitoring results, will ensure that there will be no waste and minimize potential problems. The vehicle(s) carrying out the spray operations will be equipped with a bag of absorbent, activated charcoal, leak-proof containers, a broom and a shovel in case of minor spills. A clipboard log of the herbicides on the vehicle will be kept on the vehicle. Herbicide labels and fact sheets should be carried on-site by the applicator.

As soon as any spill is observed, immediate action will be taken to contain the spill and protect the spill area. The cause of the spill must be identified and secured. Spill containment will be accomplished by covering the spill with Speedi-Dri or other absorptive material or, for large spills, building clay or soil dikes to impede spill progress. Until completely clean, protection of the spill area will be accomplished by placing barriers, flagging or crewmembers at strategic locations. If a fire is involved, care will be taken to a avoid breathing fumes from any burning chemicals.

Minor spills will be remedied by soaking up the spill with Speedi-Dri or other adsorptive material and placing it in leak proof containers, removed from the site and disposed of property. Dry herbicides, such as granules, will be swept up or shoveled up directly in leak proof containers for proper disposal. All contaminated soil will be placed in leak proof containers, removed from the site and disposed of properly. Activated charcoal will be incorporated into the soil at the spill location at a rate of sever pounds per thousand square feet to inactivate any herbicide residue. Any minor spill will be reported to the Pesticide Bureau.

Major spills will be handled in a similar manner as minor spills, except in cases where the spill cannot be contained and/or removed by the crew. MassDEP will be contacted when there is a spill of a regulated quantity of material.

In the event of a spill, information on safety precautions and clean up procedures may be gathered from the following sources:

Emergency Contacts

Ludlow

Ludlow DPW	413-583-5625
Ludlow Fire Department	413-583-8332
Ludlow Police Department	413-583-8305

Hancock

Hancock DPW	413-738-5225
Hancock Fire Department	413-738-5446
Hancock Police Department	413-738-5225

Lanesborough

Lanesborough DPW	413-443-1921
Lanesborough Fire Department	413-443-2321
Lanesborough Police Department	413-443-4107

National and State

Bureau Environmental Health Assessment	617-624-5757
Protection Incident Response Unit	888-304-1133
EPA Pesticide Hotline	800-858-7378

ChemTrec	(800) 424-9300	Chemical Industry Emergency Response System
Mass. Pesticide Bureau	(617) 626-1781	For all Pesticide Spills, Fire, and Related Accidents
Mass. DEP Western Regional Office	(413) 784-1100 888-304-1133	For Emergencies Involving Reportable Quantities of Hazardous Materials

BASF Company	(800) 832-4357	For Medical Emergencies Involving Arsenal Herbicide
Dow-Agro Sciences	(800) 992-5994	For Emergencies Involving Dow Products
Du Pont	(800) 441-3637	For Medical Emergencies Involving Du Pont Products
Bayer Environmental Science	(800) 334-7577	For Emergencies Involving Bayer Products
Loveland Products	1-866-944-8565	
Loveland 24 hr. Emergency	(800) 424-9300	For Emergency involving Loveland Product
Mass. Poison Information Center	(800) 682-9211	For Medical Emergencies Involving Pesticides