National Fuel Gas Supply Corporation

Preparedness, Prevention, and

Contingency Plan

2021 FM120 Insertion Project

Prepared by:

GAI Consultants, Inc. for National Fuel Gas Supply Corporation

January 2021

TABLE OF CONTENTS

Facility Information

Facility Name			Directions to Facility
2021 FM120 Insertion Project			From the DEP Regional Office, head northeast on Market St toward Aberdeen St. Turn left onto PA-230 W/N Camerson St. At Burger King, continue onto US-22 W. Continue onto US-322 W. Slight right onto PA-144 N. Turn right toward S Harrison Rd. Merge onto S Harrison Rd. Turn right onto PA-26 N. Turn left onto the ramp to I-80/State College. Keep right at the fork, follow signs for I-99 N/US-220 N/PA-26 N and merge onto I-99 N/PA-26 N/US-220 N. Merge onto I-99 N/PA-26 N/US-220 N. Continue onto PA-26 N/US-220 N. Turn right to merge onto I-80 W toward DuBois W. Take exit 147 toward PA-144/Snow Shoe. Merge onto Beechcreek Rd. Turn left onto PA-144 N/E Sycamore St. Turn right onto Askey Rd. Continue onto PA-879 W. Slight right toward Quehanna Hwy. Slight right onto Quehanna Hwy. Turn right onto Wykoff Run Rd. Turn left onto PA-120 W. Turn right onto Woodland Ave. Turn left onto Rich Valley Rd. Turn left onto Bobbys Run Rd. Travel approximately 7.0 miles where pipeline crosses the road.
Address of Facility/ Job Trailer			
Street			
Linear project in Cameron, Elk, and McKean Counties			
City	**State**	**Zip Code**	
Linear project in Cameron, Elk, and McKean Counties	PA	15857	
Coordinates	**County**		
Start: 41.620550, -78.481666 End: 41.458364, -78.388866	Cameron, Elk, and McKean		

Owner/Operator Information

Name	Telephone	
National Fuel Gas Supply Corporation	814.871.8582	
Address		
Street		
1100 State Street		
City	**State**	**Zip Code**
Erie	PA	16501

Environmental Contact	Dan Young	814/871-8582 814/722-9749
Construction Contact	Matt Sicher	814/837-9585 814/730-6041

Local Emergency Numbers

Closest Fire Station
Crystal VFD Station 1-11
814.781.1717

Closest Police
St Marys Police Department
814.781.1315

Closest Ambulance
Elk County EMS
814.245.2434

Closest Hospital
Penn Highlands DuBois
814.371.2200

National Response Center
Region 3
800.424.8802

DEP/DEC Regional Office
PADEP Northcentral Regional Office
570.327.3636

DIAL 911 IN AN EMERGENCY

Description of Facility

National Fuel proposes to use FlexSteel pipe to replace approximately 12.5 miles of an existing 12-inch diameter, 1950's vintage bare steel pipeline, known as the FM120 Pipeline. The new 6-inch diameter 1500 FlexSteel composite pipeline will be inserted through the existing 12-inch diameter pipeline, which would otherwise require significant maintenance and repair to return to pressurized natural gas service. Prior to its use for insertion of FlexSteel, the existing pipeline will be purged of residual natural gas and pigged of free-flowing liquids, requiring no ground disturbance. Insertion of FlexSteel into the existing pipeline will significantly reduce excavation, earth disturbance, and other activities associated with removal of the existing 12-inch steel pipeline and installation of a new steel pipeline into the right-of-way (ROW). The entire 50-foot wide existing FM120 Pipeline ROW is not anticipated to be disturbed, but the FlexSteel insertion is anticipated to require 33 bell holes along the pipeline for installation and pull out, as well as cathodic protection on the couplings. Bell hole excavation areas were designed to be located outside of environmentally sensitive areas to the extent practicable; however, excavation within wetlands and/or floodways will be required at minimal locations to facilitate removal of existing pipeline elbows (fittings) as the bend angles preclude the 6-inch diameter FlexSteel insertion. Additional temporary workspace, staging areas and temporary access roads have been identified where needed to support construction of the Project.

Spill Prevention and Response Procedures

Typical Equipment Used

Typical construction equipment used will be dozers, backhoes, excavators, and sidebooms. Other equipment will be tractor-trailers, flatbed trucks, pickup trucks, and passenger vehicles. Auxiliary equipment used includes chain saws, air compressors, welding equipment, water pumps, logging equipment, road graders and vibratory tampers, skidders, chippers, cultimulchers, light plants and rock rakes.

Hazardous Materials Handling

All employees handling fuels and other hazardous materials will be properly trained. All equipment will be in good operating order and inspected on a regular basis. Fuel trucks transporting fuel to onsite equipment will travel only on approved access roads. All equipment will be parked overnight and/or fueled at least 100 feet from a waterbody or in an upland area at least 100 feet from a wetland boundary, unless the Environmental Inspector determines there is no reasonable alternative, and appropriate steps have been taken (including secondary containment structures) to prevent spills and provide for prompt cleanup in the event of a spill. Hazardous materials, including chemicals, fuels, and lubricating oils, will not be stored within 100 feet of a wetland, waterbody, or designated municipal watershed area, unless the location is designated for such use by an appropriate governmental authority. This applies to storage of these materials and does not apply to normal operation or use of equipment in these areas. Concrete coating activities will not be performed within 100 feet of a wetland or waterbody boundary, unless the location is an existing industrial site designated for such use. These activities can occur closer only if the Environmental Inspector determines there is no reasonable alternative, and appropriate steps have been taken (including secondary containment structures) to prevent spills and provide for prompt cleanup in the event of a spill. Pumps operating within 100 feet of a waterbody or wetland boundary will be contained within appropriate secondary containment systems to prevent spills. Bulk storage of hazardous materials, including chemicals, fuels, and lubricating oils will be contained within appropriate secondary containment systems to prevent spills.

Operations will be structured in such a manner that provides for the prompt and effective cleanup of spills of fuel and other hazardous materials. Each construction crew (including cleanup crews) will have on hand sufficient supplies of absorbent and barrier materials to allow the rapid containment and recovery of spilled materials and will follow the procedures for reporting spills and unanticipated discoveries of contamination. Each construction crew will have on hand sufficient tools and material to stop leaks.

Typically, mobile equipment mechanics will perform routine maintenance. This position will perform daily inspections, accomplish oiling, greasing, hydraulics, and fueling operations. Primary

to this job is the preventive maintenance activities associated with mobile equipment; specifically monitoring equipment for potential leaking connections.

Smaller vehicles that will be traveling on town and state roads in addition to the pipeline right-of-way will be fueled and maintained by their operators at local gasoline stations whenever possible or at designated staging area(s).

Emergency Response Program

Our intent is to minimize the hazards of storing and transferring liquids during the project. Only the minimum volumes required for the efficiency of the operation will be onsite, either in staging areas or on the right-of-way. Company and contractor personnel on the job will be trained in the proper handling of materials and in spill prevention, containment, and disposal procedures.

In staging areas, all hazardous liquids will be stored within diked areas, the volumetric capacity of which shall be at least 110% of the largest tank within the dike. Walls of the diked area shall be earth with an eight-mil plastic lining, unless the storage container is an approved double-walled vessel.

Along the right-of-way, fuels and other equipment related fluids will be handled in Occupational Safety and Health Administration (OSHA)-approved containers.

Each material will be properly labeled. Material Safety Data Sheets (MSDS) describing proper handling and the hazards associated with each material will be available onsite or through a call-in MSDS agency.

Company construction inspectors and contractor employees have received specific training in the handling of materials to be used on the job including:

1. Hazmat training.
2. Chemicals present in the workplace.
3. Emergency Communication Procedures.
4. Observation and inspection techniques used to detect the presence or release of hazardous chemicals in the work area.
5. Signs and symptoms of human exposure.

6. Personal Protective Equipment requirements.
7. Emergency exposure procedures.
8. Spill Containment & Cleanup techniques.

Spill, Leak, Prevention and Response

Emergency Spill Control Kits are available at the field office, with each work crew, or at convenient and accessible locations along the job.

Much of the spill control program will rely on thoroughly considered material location within a job site, daily inspection and the care in handling potential contaminants. This will be reinforced with the construction inspectors during training specific to this project.

All inspectors will have had hazardous material training. This training includes methods and procedures on leak prevention, containment, and removal of hazardous spills.

Spill potential will be evaluated at each site used on the project prior to occupancy with special attention to streams and wetlands. Provisions will be made to locate potential contaminants onsite so as to minimize movement within and offsite should a spill occur. Where large volumes of potential contaminants will be located onsite, containment facilities will be constructed.

All materials must be properly labeled, including contents and the start date of accumulation. Allowable storage times of containers are determined by the amount of waste generated per month. Adequate supplies of absorbent materials compatible with potential contaminants will be available onsite. Site inspections should occur at an appropriate frequency to determine the integrity of storage facilities, containment facilities, the contractors' adherence to requested handling procedures, and housekeeping.

In the event of a leak or spill the following steps will be taken:

1. Personnel will be mobilized to the leak or spill site and will contain the spill by constructing a dike or emergency containment structure. Use of absorbent may also be necessary.
2. Contents of a leaking container will be removed and placed in another tank.
3. All soil showing obvious signs of contamination will be excavated.

4. Depending on the type and extent of spill, testing with a photo-ionization meter for additional soil contamination and excavation of any remaining contaminated soils will be performed.
5. If storage of contaminated soil is necessary; the soil shall be placed on an eight-mil plastic liner and covered with an eight-mil plastic liner.
6. The excavated area will be backfilled with clean soil.
7. Major spills will have soil samples taken and sent to a certified laboratory to ensure all contamination has been removed.
8. Contaminated soils will be hauled by a standard triaxle (covered) or dump truck (covered) to a landfill authorized to take such material.
9. For contaminated soils identified as hazardous, arrangements will be made with a licensed hazardous waste hauler to transport the material to a registered landfill.

Unanticipated Hazardous Waste Discoveries

When unanticipated contamination is discovered in the right-of-way, especially if it is located in the path of construction, the appropriate preventive actions will need to be performed to address the contaminants. In the event that previously unreported or unanticipated hazardous wastes or contaminated sites are discovered during construction, the following procedures will be followed:

Identification

Identification and Recognition of Contamination (Hazardous Materials)

During construction, indicators of possible contamination may include, but are not limited to:

- Rusted barrels and containers
- Stained or discolored earth in contrast with adjoining soil
- Fill material containing debris other than construction-related items
- Household trash covered by earth or industrial waste debris
- Gasoline smells or other odors which emanate when the earth is disturbed

- Oily residue intermixed with earth
- Sheen on groundwater
- Cinders and other combustion products like ash; and
- Structures such as asbestos cement (transite) pipe, abandoned oil and gas lines, and underground storage tanks also require special handling when disturbed.

Response

- Contractor will immediately stop work in the vicinity of any suspected contamination.
- Contractor will cordon off or otherwise restrict access to the suspected area. Contractors, subcontractors, or other personnel will not handle or disturb potentially contaminated material or the surrounding soil until review with the Environmental Inspector and Environmental Manager.
- Contractor will immediately notify National Fuel's onsite Environmental Inspector.
- National Fuel's onsite Environmental Inspector will immediately notify the National Fuel Environmental Manager.
- National Fuel will notify the landowner(s) of the suspected parcel(s).
- Document the event starting with the discovery.

Implementation Plan (if deemed necessary by National Fuel Environmental Inspector)

1. Contact a qualified consultant and/or testing laboratory to assist with the determination of the extent and nature of the contamination.
2. Devise a plan for additional site-specific investigations as necessary.
3. Conduct the necessary level of site-specific testing and/or laboratory analysis to determine extent and nature of contamination.
4. Notify all applicable environmental authorities as required by law including the following:

814.776.5373

Elk County Conservation District
850 Washington St
St Marys, PA 15857

814.776.1161	Elk County Courthouse 50 Main St Ridgway, PA 15853
814.486.2244	Cameron County Conservation District 74 E 3rd St Emporium, PA 15834
814.486.3355	Cameron County Courthouse 20 E 5th St Emporium, PA 15834
814.887.4001	McKean County Conservation District 17137 US-6 Smethport, PA 16749
814.887.5571	McKean County Courthouse 500 W Main St Smethport, PA 16749
570.327.3636	Pennsylvania Northcentral Regional Office Dept of Environmental Protection 208 W 3rd Street, Suite 101 Willamsport, PA 17701-6448

5. Devise a site-specific plan depending on the nature and extent of the contamination encountered for continuation of construction. This step may involve evaluation avoidance options, exposure minimization options, soils/groundwater segregation and disposal management of affected materials or cleanup options as necessary to support the construction of the proposed facilities.
6. Devise a strategy or plan for handling wastes in an appropriate manner including waste characterization, hauling, manifesting, and disposal necessary to support continuing pipeline construction.
7. Devise a plan for site stabilization, backfilling and restoration.
8. Complete all required and necessary agency follow-ups and reporting.

Material and Waste Inventory (Bulk Waste Disposal Plan)

Spill Control Kit

Hazmat Response Absorbent Sheets, Goggles, Latex Gloves, Drum Liner, Tyvek Coveralls, Environmental Clean-up Material: Booms, Overpack Drum, Oil Off Water Pillow, Oil Off Water Skimmer

Rights-of-Way

Right-of-way requirements vary greatly from job to job; therefore the following documents should be reviewed for restrictions:

- Landowner Restriction List
- Earth disturbance permit and ESCAMP
- The Project bid documents

In the event unforeseen contaminated soil is discovered while excavating during this project, the material will be contained, and prevented from moving offsite until local authorities are notified, if deemed necessary. Disposal arrangements will be determined.

Miscellaneous

1. Methanol will be dispersed into an OSHA-approved container and removed to an approved incinerator.
2. Expended welding supplies and coating and wrapping residue will be returned to storage containers at the staging areas, and then transported to an approved landfill.
3. Miscellaneous materials (seed bags, wire, lumber, non-hazardous scrap) will be separated and returned to storage containers at the staging area. These will be recycled or disposed of at an approved landfill.
4. Unused materials, not considered waste, will be returned to inventory.

National Fuel Approved Disposal Sites

If a spill occur, the first priority is containment. After containment has been achieved, the appropriate emergency contacts will be made, and arrangements will be made for proper disposal of the collected material.

Approved Sites	**Waste Products**
Lake View Landfill 851 Robison Road Erie, PA 814.825.8588	Contaminated Soil
CID Landfill 10860 Olean Road Chafee, NY 14030	Fuels, Oils, Antifreeze

716.496.5000

Greentree Landfill (BFI) 635 Toby Road Kersey, PA 15846 814.265.1744	Fuels, Oils, Antifreeze
Clarion Environmental State Route 36 P.O. Box 237 Leeper, PA 16233 814.744.8220	Fuels, Oils, Antifreeze
United Environmental Services 241 McAleer Road Sewickley, PA 15143p 412.367.4427	Spent Methanol

The following contractors are available to provide support, if required to the general contractor:

Fox Construction North Collins, NY 716.337.2546	water, brine hauling, dump truck, dozer
Haley Construction Little Valley, NY 716.938.9183	backhoe, dozer, dump truck
Winter's Rigging North Collins, NY 716.337.3930	heavy equipment moving, crane truck services
Kirila Contractors, Inc. 505 Bedford Road, Brookfield, OH 44403 330.448.4055	water, dump truck, dozer,
Lineal Industries, Inc. 5631 Steubenville Pike Pittsburgh, PA 15136 412.787.0410	backhoe, dozer, dump truck
Belser Hale 814.368.4467	backhoe, dozer, dump truck
International Waste Niagara Falls, NY 716.285.9101	waste disposal

Emergency Contacts

	Mailing Address
The National Response Center (NRC)	U.S. Coast Guard
800.424.8802	2100 Second St. SW

Washington, DC 20593

On-Scene Coordinator (OSC)

215.814.5700

EPA Region III - Pennsylvania
1650 Arch Street
Philadelphia, PA 19103-2029

State Spill Hotline

800.541.2050
814.332.6945

Pennsylvania State
Dept of Environmental Protection
Rachel Carlson State Office Building
Harrisburg, PA 17105

Local Authorities

814.486.2244

Cameron County Conservation District
74 E 3rd Street
Emporium, PA 15834

814.776.5373

Elk County Conservation District
850 Washington St
St Marys, PA 15857

814.887.4001

McKean County Conservation District
17137 US-6
Smethport, PA 16749

814.359.5250

Pennsylvania Fish & Boat Commission
Northcentral Region
595 East Rolling Ridge Drive
Bellefonte, PA 16823

Poison Centers

800.222.1222 – emergency
412.390.3300

Poisoning incident
Pittsburgh Poison Control Center
200 Lothrop Street
Pittsburgh, PA 15213