

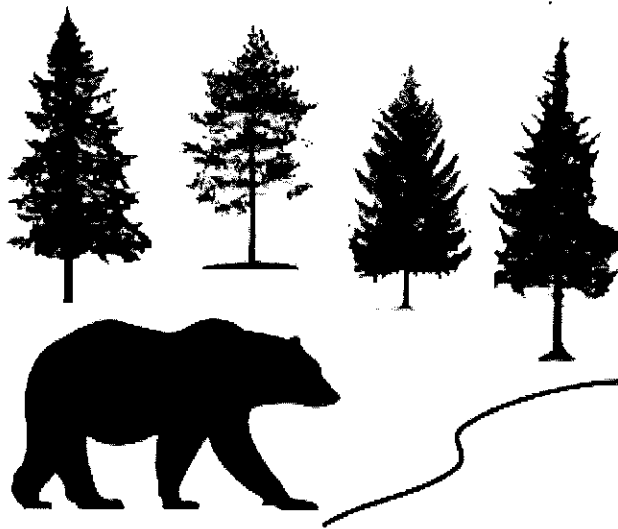
PREPAREDNESS, PREVENTION, AND CONTINGENCY PLAN

FOR THE:

**KENDRA II, LLC
BEAR LAKE DISPOSAL FACILITY
1889 CORNISH HILL ROAD (SR 4004)
BEAR LAKE, PA 16402**

PREPARED FOR:

**Kendra II, LLC
(Bear Lake Properties, LLC)
5459 State Route 29
Springville, PA 18844**



PREPARATION DATE: SEPTEMBER 2020

(Replaces Former PPC Plan)

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1.0 INTRODUCTION

This Preparedness, Prevention, and Contingency Plan (Plan) has been developed for the Kendra II, LLC (Kendra) KENDRA II – Bear Lake Disposal Facility (Facility), located at 1889 Cornish Hill Road (State Route 4004) in Columbus Township, Warren County, Pennsylvania. The objective of this Plan is to comply with the requirements of the Pennsylvania Department of Environmental Protection's (PADEP or Department) Guidelines for The Development and Implementation of Environmental Emergency Response Plans (PADEP Document #400-2200-001), to satisfy the conditions set forth in the PADEP's Form L – Contingency Plan for Environmental Procedures (PADEP Document #2540-PM-BWM0384, Rev. 10/2016). The contents of this Plan comply with the requirements of the Pennsylvania Solid Waste Management Act and Clean Streams Law, as well as the Federal Clean Water Act, and National Pollutant Discharge Elimination System (NPDES) codified at Title 40 of the Code of Federal Regulations (CFR) §122.

2.0 PLAN REVIEW

2.1 Plan Review and Amendments

This Plan will be reviewed periodically, and amended whenever there is a change in design, industrial process, operation, or maintenance practices which affect the Facility's potential to release pollutants. This Plan will be revised if the review indicates that more effective control and prevention technology is feasible.

The plan will also be amended when:

1. the applicable PADEP or federal regulations are revised;
2. the names and titles of the Pollution Prevention Team (PPT), emergency coordinators, and list of emergency equipment changes
3. the plan fails in an emergency; and/or
4. as otherwise required by PADEP.

2.2 Plan Availability and Retention

The Plan will be maintained at the Facility at all times and will be made available for review by Facility employees, the PADEP, emergency responders, or its authorized representative.

If the Plan is reviewed and the Facility is notified at any time that the Plan does not meet one or more of the requirements, revisions will be made to the Plan and written certification will be submitted to the PADEP that the changes have been made, within 14 calendar days.

2.3 Distribution of the Plan

A copy of the Plan and any subsequent revisions will be maintained at the Facility. All members of the Facility organization responsible for developing, implementing, and maintaining the Plan and all emergency coordinators will review the Plan and be thoroughly familiar with its contents.

Additional copies of the Plan can be made available to the following agencies, to the extent to which they may become involved in an actual emergency:

1. County and local Emergency Management Agencies
2. Local Fire Service Agencies and/or Hazmat Team
3. Local Emergency Medical Service Agencies
4. Local Police

3.0 CONTENTS OF THE PLAN

3.1 Facility Description

The Facility is located at 1889 Cornish Hill Road (State Route 4004) in Columbus Township, Warren County, Pennsylvania on 29.88 acres of land, of which approximately 1.0 acres are used for industrial processes. The property is located in a mixed residential-agricultural area of Columbus Township. The Facility is bordered to the north by State Line Road with residential and agricultural properties, to the east by Cornish Hill Road and agricultural properties, and to the south by residential and agricultural properties. Forested and undeveloped properties border the facility to the west. An unnamed tributary (64648) to Brokenstraw Creek is located approximately 0.3 miles to the southwest of the storage tank area and an unnamed tributary (56265) is located approximately 0.40 miles to the south of the unloading pad area. (Figure 1).

The historical use of the property included residential and agricultural activities up through 2010 when Bear Lake Properties, LLC. (BLP) built their transfer facility, storage, and commenced injection operations. BLP operated the facility through June 2020, at which time Kendra took over BLP and all operations.

Unloading Areas

The unloading area provides the mechanism for fluid transfers to the Facility by using transfer pumps or the pumps on each truck and is located in the eastern portion of the Facility near Cornish Hill Road. The unloading area is operated 24 hours per day, 6 days per week and are manned by Facility personnel. All offloading activities are completed by Facility personnel only. Trucks utilizing the offloading site park on a concrete pad while unloading into the pipeline, thus directing any spillage directly into a lined pit, where such spillage is contained for recovery.

Waste Processing Area

The brine is transferred via underground pipeline from the unloading area into a series of holding tanks, four (4) 400-BBL incoming brine tanks and four (4) 300-BBL feed tanks, located at the wellsite of the Bitteringer #2 injection well. The tanks are situated within a secondary containment dike at a permitted Waste Transfer Facility. Brine from the incoming brine tanks is then pumped through Total Suspended Solids (TSS) filters and back into the feed tanks which supply brine to the injection pumps. From the injection pumps, the brine water is transferred into multiple USEPA UIC - permitted water disposal wells via underground piping. Each of the underground lines utilized to transport brine in this operation use secondary containment (functioning pipeline inside of a second pipeline). The secondary pipeline is connected to the tanks so that in the event of a leak in the primary pipeline, the fluid will be safely contained and returned to the tank while a leak is located and repaired. Any evidence of a leak in the primary pipeline will result in the immediate suspension of operations until repairs are completed. Any small appurtenances of the pipeline (valve risers or wellheads)

which are not contained in the secondary line are located above ground and will be visually inspected for leakage daily. And evidence of leakage will result in the cessation of operations until such leakage is repaired.

A list of chemicals stored within the Injection Pumps Building Area are provided on **Table 1**. All chemical loading and unloading are performed under direct Facility personnel supervision, within secondary containment.

3.1.1 Description of Industrial Activity

The Facility operates under the Standard Industrial Classification (SIC) Code of 1389 (Oil & Gas-Other) and provides disposal of saltwater brine from the oil and gas industry. The Facility houses an unloading pad area and transfer pumps, four (4) 400-BBL and four (4) 300-BBL aboveground storage tanks (AST), TSS filtration equipment and injection of filtered liquids. The Facility is operated under a PADEP Waste Transfer Facility Permit #301366 and multiple USEPA UIC permitted injection wells for the processing and disposal of oil and gas liquid wastes generated during the production of oil and natural gas.

3.1.2 Facility Maps

A Facility Map is provided as **Figure 2**, and includes the following information:

1. general layout of the Facility;
2. property boundaries;
3. topography;
4. areas occupied by manufacturing or commercial activities;
5. raw materials and product storage;
6. high risk areas where spills and leaks most likely would occur;
7. entrance and exit routes to the Facility; and,
8. general Facility information.

3.1.3 Description of Existing Emergency Response Plans

The Facility is currently in operation and this plan is compatible with existing emergency response and spill prevention plans. The operations and subcontractors will maintain the secondary containment measures detailed on the site drawings. Any 55-gallon drums containing chemicals or petroleum products stored on-site are situated on properly sized spill pallets or within secondary containment.

The Facility takes a very responsible attitude toward safety, health, and the wellbeing of all employees. Proper emergency planning and response are important elements of the safety and health program to help minimize exposure to injury. This Plan and any other applicable plan will be implemented by the Facility in the event of a spill, fire, or other emergency. The Plan will be located in an easily accessible location so the Emergency Coordinators and local emergency response agencies can readily access the document during an emergency.

3.1.4 Material Inventory

Table 1 identifies and lists by common chemical name and/or trade name the locations, sources, and quantities of raw materials, commercial chemical products, and manufacturing chemical intermediates managed at the Facility. The Facility is required to update the inventory if new chemicals and/or additional quantities are added. Safety Data Sheets (SDS) are provided as part of the Facility's Hazard Communication Program.

3.1.5 Pollution Incident History

There have been no reportable releases at the Facility in the last three years.

3.1.6 Implementation Schedule for Plan Elements Not Currently in Place

This PPC Plan had originally been prepared in December 2014 by BLP and updated in January 2018. The Facility management and ownership within BLP changed in June 2020. The PPC Plan will be revised periodically, as needed, following initiation of operations to reflect those processes and procedures applicable to the facility.

3.2 Description of How Plan is Implemented by Organization

The PPT has been selected to lead the Facility in preventing and responding to releases. The PPT will consist of the emergency response coordinator, who will be directly responsible for the implementation of the Plan, and all Facility personnel identified as members of the PPT. All other Facility personnel not identified in the PPT, but directly involved in the operations of the Facility, will indirectly become part of the PPT as they will be advised of emergency measures to be taken in the event of any significant release.

3.2.1 Organizational Structure for Implementation

The PPT selected by the Facility to lead the pollution prevention efforts is designated in **Appendix A**. This team has been developed using staff who are actively and directly involved in the ongoing activities at the Facility. The PPT is responsible for observing the operations at the Facility and following the criteria included in the Plan. The PPT members will lead efforts to implement pollution prevention practices at the Facility, but

all Facility personnel are encouraged to observe activities and offer suggestions to the PPT to improve daily operations.

3.2.2 Duties and Responsibilities of Emergency Coordinator

At all times there will be at least one PPT member either on the Facility premises or on-call with the responsibility for coordinating all emergency response measures. This Emergency Coordinator will be thoroughly familiar with all aspects of the Facility's Plan, all operations and activities at the Facility, the location and characteristics of all materials, the location of all records, and the Facility layout. In addition, this person will have the authority to commit the resources needed to carry out the Plan in the event of an emergency.

The Emergency Coordinator is the supervisor for the development and implementation of this Plan. In addition, the Emergency Coordinator is responsible for maintaining operational continuity within the Facility, for all relevant documentation, and for future revisions of the Plan. The Emergency Coordinator will supervise response activities in the event of an incident at the Facility by following the procedures identified in **Sections 3.3, 3.4, and 3.5** of this Plan. The Emergency Coordinator will also make notifications of imminent or actual emergencies to the emergency response agencies and assessments of the health or environmental hazards.

The Emergency Coordinator for the Facility will be responsible for coordinating all training requirements associated with the Plan. The Emergency Coordinator is responsible for developing the required training program and maintaining all records of training as specified in **Section 3.3.10**.

The PPT will perform housekeeping procedures as specified in **Section 3.3.7**, perform inspections, identify necessary maintenance, and will follow all pollution prevention procedures outlined in **Section 3.3** for each area of the Facility in which they are working. The Emergency Coordinator for the Facility will be responsible for coordinating and overseeing all inspections, monitoring, preventative maintenance, and housekeeping associated with the Plan.

3.2.3 Chain of Command

In the event of a spill or emergency, notify the Emergency Coordinator (Appendix A) on duty as soon as possible as to the nature of the emergency, location of the spill, the materials spilled, and an estimated amount spilled. Continue to call the Emergency Coordinators until one of them is reached and is able to take responsibility for the emergency and/or spill response and countermeasures.

The Action List for Spill Responses (**Appendix B**) will be posted in several prominent locations of the Facility as a quick reference for action items during a spill. The Emergency Contacts List provided as **Appendix A** will be posted along with **Appendix B** throughout the Facility.

3.3 Spill Leak Prevention and Response

3.3.1 Pre-Release Planning

The Facility Map shows the areas where the wastes are stored at the Facility. The Facility Maps also show areas where potential spills may occur, which include storage areas and loading/unloading areas.

3.3.2 Drainage and Prediction of Flow

Included on the Facility Map are topographic contours which indicate the apparent direction of drainage at the Facility. Stormwater drainage from the facility flows (sheet flow) south and west-southwest towards an unnamed tributary (64648) to Brokenstraw Creek located approximately 0.3 miles to the southwest of the storage tank area. No storm water is discharged from the secondary containment areas.

3.3.3 Potential Pollution Sources

Areas at the Facility that have the potential to release pollutants or cause an emergency can be divided into the following general areas:

- gravel parking lot with personal and company vehicle (pickup trucks, sedans, etc.) storage;
- unloading pad;
- injection pumphouse area; and
- the storage tank farm.

Below are activities and conditions that may contribute to spills or emergencies:

- Transfer of bulk liquids from truck-mounted storage vessels to containers at the Facility
 - a. spills and overfills due to operator error;
 - b. failure or damage to filling system, hoses, valves, fittings, etc.; and,
 - c. accidents or collisions with tanks.
- Transfer of bulk liquids from one area of the Facility to another:
 - a. failure or damage to piping, valves, fittings, etc.; and
 - b. accidents of collisions involving equipment or vehicles.
- Storage of bulk liquids
 - a. external corrosion and structural failure of containers;
 - b. mechanical failure of delivery and transfer equipment; and

- c. accidents or collisions involving equipment or vehicles.
- Loading and Unloading Materials
 - a. transfer of bulk liquid containers from a truck to a storage container or vice versa;
 - b. transfer of bags, boxes, drums, or other containers by personnel, trucks, or other material handling equipment.

The potential for spills during unloading operations is minimal when standard Facility procedures are followed. Filling and evacuation of bulk storage containers will be performed within secondary containment. An increased awareness of the potential for spills is the best method for preventing spills. Awareness training and spill prevention and response procedures are mandatory for all personnel involved in operations at the Facility.

3.3.4 Secondary Containment

Loading, unloading, as well as storage of bulk storage containers will occur within secondary containment. Below is a preliminary description of secondary containment measures for the Facility.

Unloading Areas

The unloading area provides the mechanism for fluid transfers to the Facility by using transfer pumps or the pumps on each truck and is located in the eastern portion of the Facility near Cornish Hill Road. The unloading area is operated 24 hours per day, 6 days per week and are manned by Facility personnel. All offloading activities are completed by Facility personnel only. Trucks utilizing the offloading site park on a concrete pad while unloading into the pipeline, thus directing any spillage directly into a lined pit, where such spillage is contained for recovery.

The trucks are backs up onto the concrete containment area and the hoses are connected to the piping within the containment area. Drip pans and portable plastic containment liners are placed under the connections to the trucks. These pans are placed to catch any fluids which are to drip during transfer operations.

Tank Farm Area

The tank farm area houses four (4) 400-BBL fiberglass ASTs for incoming fluid storage and four (4) 300-BBL fiberglass ASTs for filtered liquids. Incoming fluids are transferred from the unloading pad area and stored within the tanks until transferred through TSS Filters and eventually injected into the USEPA permit UIC disposal wells. The tanks are placed within a secondary containment engineered to contain 110% of the tank volume. Stormwater which accumulates in the secondary containment area is pumped into one of the ASTs and disposed within the injection wells.

3.3.5 Material Compatibility

Bulk storage containers are constructed of materials that are appropriate for the respective products. Storage tanks which contain volatile chemicals will be vented in a way to avoid ignition sources.

3.3.6 Inspection, Monitoring, and Preventative Maintenance Program

The Facility will be inspected for malfunctions, deterioration, operator errors, and operations which may be causing, or may lead to, spills, emergencies, and/or potential pollution. The inspection will be conducted at a frequency sufficient enough to identify problems in time to correct them before an emergency occurs. Inspections at the Facility will be performed by the Emergency Coordinator(s) or his/her designee(s). ASTs can be inspected in a manner consistent with the Facility's SPCC Plan.

3.3.6.1 Daily Inspections

Storage containers, loading/unloading areas, and all secondary containment will be visually inspected for the following items on a daily basis:

- all storage containers and piping will be inspected for evidence of leakage, damage, and distortion;
- all injection wellheads and adjacent areas for leakage or evidence of spills;
- all loading and unloading areas will be inspected for evidence of spills; and,
- all secondary containment structures will be inspected for evidence of spills, damage, distortion, and to ensure sufficient freeboard.

If a problem is detected during the daily visual inspection, the Emergency Coordinator will be notified and the appropriate action(s) will be initiated.

3.3.6.2 Monthly Inspections

In addition to the daily visual inspections, the following areas of the Facility will be visually inspected on a monthly basis:

- all bulk chemical storage areas and associated secondary containment;
- all liquid transfer equipment and piping;
- all injection wellheads and adjacent areas;
- any areas where there is a potential for pollution substances to contact stormwater;
- all Facility security systems, including fences, alarms, and lighting; and,

- the parking lots with vehicle storage.

Monthly inspections are intended to identify all of the following potential problems:

- pollution that may impact stormwater;
- evidence of leaks;
- evidence of spills;
- evidence of a situation that can cause a fire;
- poor housekeeping;
- staining;
- compromised storage containers;
- damage to shipping containers;
- overflow of containment areas;
- corroded or leaking valves/fittings;
- evidence of cracks or deterioration of containment structures;
- evidence of problems with storage tank alarm systems;
- security issues; and
- any other evidence of a situation that could cause an emergency.

On a monthly basis, the designated employee will also verify that adequate supplies of spill control materials are readily accessible to personnel in designated areas. If the need for housekeeping is identified in any area, he or she will complete the required task or notify the appropriate personnel.

If a problem is detected during the monthly inspection, the Emergency Coordinator will be notified and the appropriate action initiated. Preventive maintenance may include adjustment, repair or replacement of equipment, materials, or structures.

3.3.6.3 Record Keeping

The monthly inspections will be recorded on the Record of Testing and Preventive Maintenance Form provided in **Appendix C**. By signing this form, the inspector is also acknowledging that brief daily inspections of the noted areas have been completed. All inspection reports will be kept in **Appendix D**. Based on the results of the inspection, the Plan will be revised to address changes in the description of potential pollutant sources and necessary pollution prevention measures and controls, if needed. Plan revisions will be recorded in **Appendix D**.

The Record of Testing and Preventive Maintenance form will be completed as a report summarizing the findings of the inspection. The report will include the following items:

- scope of the inspection;
- personnel involved in the inspection;
- the dates of the inspection;
- records of the observations made in regard to the implementation of the Plan; and,
- any revisions made to the Plan.

The inspection requires certification by the Emergency Coordinator. Additional requirements are necessary for inspections of bulk storage tanks that contain oils, and this information can be found in the Facility's SPCC Plan. Inspection records will be maintained at the Facility and may be kept in the same location as the SPCC Inspection Forms.

3.3.7 Good Housekeeping

The Facility will follow good housekeeping practices to reduce the possibility of accidental spills and fires, and to minimize safety hazards to Facility personnel.

The greatest potential for a spill identified by this Plan is a release from a bulk storage container or tanker truck. A release would most likely occur accidentally during the unloading or loading of a bulk storage container, during fluid transfers, or from an accidental impact between a vehicle and a bulk storage container. Preventing these accidental releases will be relatively simple by ensuring that the loading / unloading area is free of debris and equipment, and vehicles that are not necessary for the loading/unloading procedures are removed from the area. Clear communication between workers is crucial.

Secondary containment areas will be kept clean and organized. Chemical storage containers will be placed in the secondary containment structure with special consideration given to when they will be used. This will allow efficient access without having to move additional containers. All liquid chemical storage containers will be placed into secondary containment immediately following delivery.

All loading and unloading activities will be completed within containment. Small spills may occur during material handling and transfers. Any spilled material will be cleaned up immediately. It is the responsibility of all personnel to clean up any spilled material. Solid materials can be swept or shoveled into appropriate containers. Any liquid spills will be absorbed with granular material, pads, or booms. Spent material will

immediately be placed into an appropriate container. No spent spill control materials will be left on the ground surface for any longer than is necessary for them to have their intended effect.

All chemical storage containers will be secured from accidental releases to the extent possible. Some smaller bulk storage containers may have ports near the bottom of the tanks. These ports will be plugged and/or valved. All valves located on lower ports will have valve locks to prevent them from being opened accidentally. Small storage containers will be specifically designed for containing the specific chemical.

Only vehicles that are in good working order and are not leaking fluids will be stored outside. Vehicles with fluid leaks will be moved indoors or taken for service immediately. In the event that a vehicle in need of service will be temporarily staged outside at the Facility, all potential leaks will be identified, and appropriate steps will be taken to prevent a spill to the ground surface. The vehicle will be staged on an asphalt or concrete surface, and containment vessels (i.e., drip pans or "duck ponds") will be used to contain leaks. Absorbent material will be placed into the containment vessel to eliminate standing product. Containment vessels will be checked frequently and addressed as necessary until the vehicle can be repaired or taken for repairs. Any spills to the ground surface outside will be addressed immediately to prevent migration.

The following additional good housekeeping measures will also be implemented at the Facility:

- vehicles will not be staged in traffic zones for any amount of time longer than required for loading/unloading to leave unobstructed movement for vehicles during an emergency;
- neat and orderly storage of bulk chemical containers;
- refuse containers must be covered when not in use;
- regular refuse pickup and disposal;
- maintenance of clean, dry floors by use of brooms, vacuum cleaners, and cleaning machines;
- storage of equipment and materials, such that walkways are not obstructed;
- prompt cleanup of small liquid spills to prevent discharge or transport to other areas; and
- strong encouragement of all personnel to actively engage in good housekeeping measures.

3.3.7.1 Nuisance Control

In addition to good housekeeping measures and controls, the Facility will take control measures to inspect for, and provide countermeasures for nuisance animals, vectors, noise, dust, litter, lighting, and odors. A Nuisance Control Plan has been developed for the Facility, and is provided as **Appendix F**.

3.3.8 Security

The Facility is manned only when the facility is in operation and to supervise the loading/unloading area. Cameras are installed in and around the Facility, and the real-time video footage 24 hours a day, 7 days per week is viewable in the office. Sufficient exterior lighting exists at the Facility, including high-output lights mounted on poles. The Facility perimeter is enclosed with fencing. The potential for vandalism or trespassing is low.

3.3.9 External Factor Planning

A power outage would limit Facility operations but would not significantly increase the potential of a release because the secondary containment structures do not rely on electricity. A sudden decrease in manpower (i.e. strike or walkout) would not have a significant effect on pollution potential as long as the monthly inspections and preventative maintenance schedule are maintained.

The Facility is located outside of the Federal Emergency Management Agency (FEMA) 100-year floodplain. Therefore, seasonal flooding will not affect the Facility.

3.3.10 Employee Training

An **annual** training program has been developed to inform Facility personnel of the components and goals of this Plan. The training program will be implemented concurrently with the training required by the Facility's SPCC Plan and Occupational Safety and Health Administration (OSHA) Accident Prevention and Safety Practices. Training topics will address:

- the general goals of the Plan;
- daily and monthly inspections;
- record keeping;
- safety measures and health hazards;
- preventive maintenance;
- spill prevention and response including the location and proper use of emergency spill equipment;
- site evacuation procedures;
- response to fires and explosions;
- emergency communications;
- good housekeeping procedures; and
- applicable OSHA Accident Prevention and Safety Practices, as required

- hazard communication;
- fall protection;
- lockout tagout (LOTO);
- hot work procedures;
- first aid procedures;
- any other required OSHA training.

Training will address how and why each component of the Plan will be implemented. Training will be provided to all members of the PPT and their alternates, and may also include maintenance, permanent, and transient personnel, as deemed necessary by the Emergency Coordinator.

The Emergency Coordinator is responsible for developing and implementing the training program. The Emergency Coordinator will determine the appropriate level of training required for each employee's position at the Facility. The Emergency Coordinator will also be responsible for maintaining current training records for each employee. All employees who receive training are recorded on the Record of Employee Training form provided in **Appendix G**. Records of the employee's attendance in the training program will also be included in personnel files.

3.3.11 Spill History Record Keeping

A list of spills that have occurred at the Facility is included in **Appendix H**. Any additional spills occurring at the Facility will also be recorded on the Spill Report Form as provided in **Appendix I**. In the event that a significant spill or leak occurs, including hazardous substances equal to or in excess of reportable quantities, this section of the Plan will be updated to reflect the incident within 14 calendar days, and the amendments will be included in **Appendix E**. These records will include:

- a description of the release;
- the circumstances of the release; and
- the Plan will also be amended to prevent a reoccurrence of such a release.

This is consistent with the reporting requirements established in the SPCC Plan. In addition, the spill prevention and response procedures and countermeasures outlined in this Plan will be evaluated to determine if the planned response was adequate, and modified, if necessary, with expanded practices to minimize future spill potential. The SPCC Plan documents the additional procedures to follow in the event there is an oil spill at the Facility and is consistent with the procedures outlined in this Plan. Any oil spill occurring at the Facility will also be recorded on the Spill Report form in the SPCC Plan.

3.4 Countermeasures

An effective spill prevention and response program is an important part of the Plan. The following section will describe the proper method of handling spills at the Facility and summarize emergency procedures.

3.4.1 **Countermeasures Undertaken by the Facility**

Facility personnel will be familiar with the location and proper use of spill prevention and response equipment so that spills and fires can be contained and prevented from migrating from the area. Adequate supplies of emergency equipment, such as absorbent materials and fire extinguishers, are maintained throughout the Facility for convenient accessibility.

In the event of a spill at the Facility, the following steps will be implemented immediately:

1. **Ensure the safety of the personnel in the area.** Never compromise personnel safety. If an injury has occurred, immediately contact the supervisor or Emergency Coordinator for further instructions, or call 911.
2. **Extinguish any source of ignition.** If no danger exists to personnel, attempt to extinguish any source of ignition or small fires.
3. **All attempts will be made to stop the spill at its source.** If no danger exists to personnel, attempt to stop the spill at its source. Many times simple steps, such as turning valves or plugging leaks, can stop the flow at its source. Any incipient fires can be terminated using a fire extinguisher if safe to do so.
4. **Contain the material in the smallest possible area.** Using absorbent materials, which are located throughout the Facility, contain the spill before it can reach a site drainage feature, if possible. **Table 2** lists the equipment available on-site for spill containment and cleanup.
5. **Identify the spilled material.** It is important to identify the spilled material so that the SDS can be used to identify health hazards, environmental warnings, and material compatibility.
6. **Notify the Emergency Coordinator.** Report the incident to the Emergency Coordinator immediately. The Emergency Coordinator will determine if outside contractors are needed to help clean up a spill or if agency reporting is required.
7. **Begin the Notification Procedures.** An assessment of potential hazards to public health and safety, public welfare, and the environment will be performed and the applicable notifications to emergency responders initiated.
8. **Recover or Clean Up the Spilled Material.** As much material as possible will be recovered and reused where appropriate. Liquids absorbed by solid materials will be shoveled into open top drums. All equipment used in the cleanup will be decontaminated. When drums are filled or the cleanup is finished, the drum lids will be secured and the drums will be appropriately labeled identifying the contents. Mixing of wastes will be avoided. Arrangement for proper disposal of the waste in accordance with applicable federal and state regulations will be made. Recovered wastes will be stored away from the affected area to avoid restricting the movement of emergency responders and/or cleanup crews.
9. **Prepare an Internal Report.** After the spill has been cleaned, the Emergency Coordinator will complete a Spill Report Form provided in **Appendix I**. This form will record the details of the incident. If it has been determined that written notification to a regulatory agency is

required, the Emergency Coordinator will prepare those written reports as specified in the rules listed in item six above.

10. **Evaluate the Plan and Amend if Necessary.** The cause of the incident will be determined and an evaluation of the spill response procedures will be completed. Any deficiencies will be corrected and an amendment to the Plan will be made accordingly. In the event that a significant spill occurs, **Section 3.3.11** of the Plan (Spill History) will be updated.

3.4.2 Countermeasures Undertaken by Contractors

If deemed necessary by the Emergency Coordinator, outside contractors will be contacted to assist the PPT with spill containment and recovery procedures. A list of emergency spill response contractors with availability to provide prompt services at short notice is provided in **Table 3**.

Equipment suppliers have been identified to ensure prompt delivery of equipment and materials needed for addressing spills. The equipment suppliers' contact information is also provided in **Table 2**.

3.4.3 Internal and External Communications and Alarm Systems

The Facility will likely have a maximum of two employees on-site at any time. Messages for spill response, evacuation, and other emergencies will be communicated using mobile devices (two-way radios, cell phones, etc.) verbal communication, and hand signals.

In the event of an emergency, local police, fire departments, or the county's emergency management agency can be contacted by mobile telephone. No direct alarm or communication system exists between the Facility and these departments. Emergency contact information is provided in **Appendix A**.

3.4.3.1 Federal Spill Reporting Requirements

In accordance with 40 CFR §110, if the Facility discharges a "harmful quantity" of oil (e.g. gasoline or diesel fuel) to U.S. navigable waters, then the **National Response Center** (see Appendix A) shall be contacted. A "harmful quantity" is defined by 40 CFR §110.3 as discharges of oil in such quantities that may be harmful to the public health or welfare or the environment of the United States, including discharges of oil that:

- a) Violate applicable water quality standards; or
- b) Cause a film or sheen upon or discoloration of the surface of the water or adjoining shorelines or cause a sludge or emulsion to be deposited beneath the surface of the water or upon adjoining shorelines.

Additionally, in accordance with 40 CFR §302 and §355, the **State Emergency Response Commission (SERC)**, **Local Emergency Planning Commission (LEPC)**, and **National Response Center** shall be contacted if a release of a hazardous substance that exceeds any calculated Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) of 1980 Reportable Quantity (RQ) has occurred and migrated off-site. The person reporting the release (Emergency Coordinator) must provide the following information:

- Name, location, organization, and telephone number;
- Name and address of the party responsible for the incident;
- Date and time of the incident;
- Location of the incident;
- Source and cause of the release or discharge;
- Types of material(s) released or discharged;
- Quantity of materials released or discharged;
- Danger or threat posed by the release or discharge;
- Hazards associated with the release or discharge;
- Number and types of injuries (if any);
- Corrective action taken or planned to be taken;
- Media affected or threatened by the discharge (i.e. water, land, air);
- Weather conditions at the incident location; and
- Any other information that may help emergency personnel respond to the incident

In addition to the above reporting, 40 CFR 112.4 requires that information be submitted to United States Environmental Protection Agency (US EPA) Regional Administrator in charge of oil pollution control activities whenever the following occurs:

1. a single discharge of more than 1,000 US gallons of oil to navigable waters or adjoining shorelines; **OR**
2. two discharges to navigable waters or adjoining shorelines each more than 42 US gallons of oil occurring within any twelve month period.

The following information must be submitted to the US EPA Regional Office within 60 days:

- Name of the Facility;
- Name of the owner/operator;

- Location of the Facility;
- Maximum storage or hauling capacity and normal daily throughput;
- Corrective action and countermeasures taken, including a description of equipment repairs and replacements;
- Description of facility, including maps, flow diagrams, and topographical maps;
- Cause of the discharge(s) to navigable waters and adjoining shorelines, including a failure analysis of the system and subsystem in which the failure occurred;
- Additional preventive measures taken or contemplated to minimize possibility or recurrence; and
- Other pertinent information requested by these offices.

3.4.3.2 Pennsylvania Spill Reporting Requirements

PADEP regulations state that the RQs for spills or releases involving a regulated substance as “a quantity or an unknown quantity of regulated substance released to or posing an immediate threat to surface water, groundwater, bedrock, soil or sediment”. The term does not include the following, if the owner or operator has control over the release, the release is completely contained, and, within 24 hours of the release, the total volume of the release is recovered or removed in the corrective action:

- A release to the interstitial space of a double-walled aboveground or underground storage tank;
- A release of petroleum to an aboveground surface less than 25 gallons; and
- A release of a hazardous substance to an aboveground surface that is less than its reportable quantity under CERCLA.

The PADEP emergency response hotline telephone number is listed in **Appendix A**. The PADEP encourages responders to immediately report spills of any amount if the spill threatens a waterway, or will enter a waterway or storm sewer in the future due to rain or snowmelt if unaddressed. The PADEP recommends that the following information be provided when reporting a spill:

- **Responsible party** (name of carrier, owner, operator or facility).
- **Date/time** (discovered/occurred).
- **Location** (address, cross street, mile marker).
- **Material(s)** (chemical, product, or common name).
- **Quantity** (estimated release/total).

- **Hazards** (extremely hazardous substance, placard, materials safety data sheet [MSDS]).
- **Affected media/area** (air, land or waterway, including threats to ditches, sewers, streams).
- **Actions/notifications** (evacuations, containment, contractor hired).
- **Contacts on scene** (responder cell phone number, responsible party, contractor, facility point of contact).
- **Other useful information** (truck DOT or railcar number, chemical UN ID number, SDS, etc).

The largest concern in the event of a major spill is that local drinking water supplies could be affected. Such local drinking water suppliers should be notified as soon as possible when a spill occurs. A list of downstream water users for a range of 20 miles downstream has been prepared using the PADEP's eMapPA interactive web mapper. The list of downstream users is provided in **Appendix A**.

3.4.4 Evacuation Plan for Personnel

In the event that evacuation of the Facility is necessary, the Emergency Coordinator will direct employees to evacuate to a designated safe zone. After leaving buildings, persons will assemble at the gathering point designated by the Emergency Coordinator. Evacuated people will use caution when crossing roadways and driveways and avoid blocking a roadway or driveway at any time.

If it becomes necessary to evacuate the Facility or a portion of the Facility, the following procedures will also be implemented:

- Shut off all equipment and services (gas, electric, water), if deemed necessary.
- Each supervisor will account for his/her own people.
- If any personnel are injured or require medical attention they will be taken to the following nearest medical facility. If time permits, call to alert the medical facility.

**CORRY MEMORIAL HOSPITAL
965 SHAMROCK LANE
CORRY, PA 16407
814-664-4641**

3.4.5 Emergency Equipment Available for Response

Table 2 provides a list of the equipment available for emergency spill response. The list provides the physical description, quantity, storage location, and brief summary of the intended use and capabilities for each item.

3.5 Emergency Spill Control Network

3.5.1 Arrangements with Local Emergency Response Agencies

Local hospitals, fire departments, police, and emergency response teams are available to respond to incidents at the Facility, if necessary. A list of response agencies and phone numbers is provided in **Appendix A**. In the event of an emergency, the PPC Plan will be made available to responders upon request. The Facility, as part of good housekeeping measures, will not allow vehicles to be staged in areas of traffic routes for longer than required to load/unload to allow for the unobstructed movement of emergency personnel and equipment in the event of an emergency. In the event of an emergency, the Facility will cease operations for the safety of on-site personnel and expedition of cleanup processes.

As part of emergency planning, the Facility will notify the state, county, and jurisdictional fire departments of the quantity, location, and hazard of on-site chemicals in accordance with Section 311/312 of the Emergency Planning and Community Right-to-Know Act (EPCRA), in the form of initial and annual inventory reports.

3.5.2 Notification Lists

The list of emergency response agencies, internal contacts, spill clean-up contractors, and external reporting contacts (with phone numbers) is provided in **Appendix A**. This list is prominently displayed in the Facility Office to be used in case of a spill or emergency.

3.5.3 Downstream Notification for Storage Tanks

For facilities with ASTs with an aggregate storage capacity of regulated substances greater than 21,000 gallons, Section II (E) (3) of the PADEP Guidelines for the Development and Implementation of Environmental Emergency Response Plans (August 6, 2005; PADEP Document #400-2200-001) and 25 Pa. Code §245 requires downstream notification for those Facilities. This Facility does not have ASTs with aggregate storage greater than 21,000 gallons and the material stored within the ASTs is considered to be residual waste, which does not meet the definition of a regulated substance in accordance with 25 Pa. Code §245. Therefore, downstream notification for this Facility is not required; however, in the event of a spill to surface water, downstream users may need to be notified of the conditions. A list of downstream water users for a

range of 20 miles downstream will be prepared using the PADEP's eMapPA interactive web mapper. The list of downstream users, along with a map of their locations will be prepared and maintained at the Facility and will be included in the SPCC plan.

3.5.4 Sediment and Erosion Prevention

All areas at the Facility are covered with concrete, gravel, and/or vegetation; therefore, sediment transport through erosion is not considered to be a significant source of potential pollution. If any area of the Facility cover is compromised and erosion and sedimentation becomes a potential source of pollution, this condition will be recognized during the regular Facility inspections and appropriate countermeasures will be implemented.

3.5.5 EPCRA, Section 313 Requirements

Although the Facility does not meet the definition of a Section 313 Facility as defined in Title 40 of the CFR §372.22, Section 313 water priority pollutants (WPPs) will be stored in sufficient quantities to cause pollution in the event of a catastrophic failure. The areas of the Facility that have the potential to release Section 313 WPPs can be divided into the following general areas:

1. loading/unloading areas;
2. injection wellhead areas;
3. processing equipment area; and
4. tank farm area.

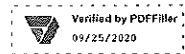
Below are activities and conditions that may contribute to spills:

- Transfer of bulk chemicals from delivery trucks to the storage tank at the Facility,
 - a. spills and overfills due to operator error;
 - b. failure or damage to filling system, hoses, valves, fittings, etc.; and,
 - c. accidents or collisions with containers.
- Storage of bulk chemicals
 - a. external corrosion and structural failure of containers;
 - b. mechanical failure of delivery equipment; and,
 - c. accidents or collisions involving equipment or vehicles;
- Processing of bulk chemicals during filtration
 - a. spills and overfills due to operator error; and,
 - b. failure or damage to piping, hoses, valves, fittings, etc.

Secondary containment, material compatibility, spill countermeasures, and routine inspections of these areas are detailed in this Plan and the Facility's SPCC Plan, and meet the additional requirements to minimize pollution of storm and surface water for Section 313 WPPs at the Facility.

4.1.6 Management Certification

I, Kenneth Scavone, certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.



Signature

09/24/2020

Date

TABLES

PREPAREDNESS, PREVENTION, AND COUNTERMEASURES PLAN
KENDRA II - BEAR LAKE DISPOSAL FACILITY
1889 CORNISH HILL ROAD
BEAR LAKE, PENNSYLVANIA 16402

TABLE 2
EMERGENCY EQUIPMENT AVAILABLE FOR RESPONSE

| Equipment | Location | Description of Use | Minimum Quantity on Hand | Supplier | Maintenance or Testing Requirements |
|---|---------------------------------|--|---------------------------------|--------------------------------------|---|
| Granular Absorbent Material | Pump House and Storage Building | Liquid Spill Containment and Recovery | 50 Pounds | New Pig or similar | Sustain inventory |
| Hand Tools (Shovels, Brooms, Gloves, etc) | Storage Building | Spent Absorbent Recovery | As Needed | Grainger, or Home Improvement Stores | Inspect after each use |
| 55 Gallon Drums | Pump House and Storage Building | Spent Absorbent Storage | 2 | Action Supply Products, or similar | Inspect for defects upon receiving |
| Absorbent Boom | Pump House and Storage Building | Liquid Spill to Surface Water Sheen Containment | 100' | New Pig | Sustain inventory |
| Universal Spill Kit | Storage Building | Acid, Base, Solvent Spill Containment and Neutralization | 1 | New Pig | Sustain inventory |
| Portable Fire Extinguishers | Throughout Facility | Termination of Incipient Stage Fires | 4 | Various | Annual and monthly inspections as required. |
| Explosive Gas Meters | Throughout Facility | Air Monitoring | 1 | Various | Calibration and maintenance per manufacturer specification. |

PREPAREDNESS, PREVENTION, AND COUNTERMEASURES PLAN
KENDRA II - BEAR LAKE DISPOSAL FACILITY
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TABLE 3
EMERGENCY SPILL RESPONSE CONTRACTORS

| Company | Address | Phone | 24/7 Dispatch |
|------------------------------|------------------------------------|--------------|---------------|
| McCutcheon Enterprises, Inc. | 250 Park Road, Apollo, PA 15613 | 844-765-0001 | 724-568-3623 |
| | | | |

FIGURES

