



PennEast Pipeline Company, LLC

PENNEAST PIPELINE PROJECT

L3-B – PREPAREDNESS, PREVENTION, AND CONTINGENCY PLAN

FERC Docket No. CP15-558-000

September 2015, Revised November 2018

Submitted by:

PennEast Pipeline Company, LLC

Contents

Section	Page
1.0	OVERVIEW.....4
2.0	FACILITY DESCRIPTION.....4
3.0	WASTE MANAGEMENT5
3.1	Material and Waste Inventory5
3.2	Hazardous Materials and Waste Inspections.....8
4.0	SPILL PLAN.....12
4.1	Spill and Leak Preparedness and Prevention.....12
4.1.1	Employee Training12
4.1.2	Security.....12
4.1.3	Prevention and Preparedness12
4.1.4	Tanks13
4.1.5	Containers.....14
4.1.6	Loading and Unloading Areas.....15
4.1.7	Concrete Coating Areas for Field Joints.....16
4.1.8	Equipment Inspections.....16
4.1.9	Emergency Equipment.....16
4.1.10	Contractor’s Site Map.....16
4.2	Housekeeping Program17
5.0	CONTINGENCY PLAN AND EMERGENCY PROCEDURES17
5.1	Responsibilities of PennEast and Contractor Personnel.....17
5.2	First Responder17
5.2.1	Contractor EC Responsibilities.....18
5.2.2	PennEast Responsibilities.....18
5.2.3	PennEast EC Responsibilities.....18
5.3	Emergency Equipment19
5.4	Spill Clean-Up/Waste Disposal Procedures20
5.4.1	Oil and/or Fuel Spills.....20
5.4.2	Hazardous Substance Releases.....21
5.4.3	Unanticipated Release of Hydrostatic Test Water.....21
5.5	Disposal of Contaminated Materials and/or Soils.....22
5.6	Equipment Cleaning/Storage.....22
6.0	REGULATORY COMPLIANCE.....26

Tables

Table 3-1 List of Oil and Fuel to be Used or Stored On Site During Construction	5
Table 3-2 List of Commercial Chemicals to be Used or Stored On Site during Construction.....	5
Table 3-3 List of Hazardous and Nonhazardous Wastes to be Used or Stored Onsite during Construction	6
Table 3-4 List of Incompatible Materials to be Used or Stored Onsite during Construction.....	7
Table 3-5 List of Large Spill Sources (larger than 660 gallons or total capacity greater than 1,320 gallons)	7
Table 3-6 List of Large Spill Sources (larger than 660 gallons or total capacity greater than 1,320 gallons)	8
Table 4-1 Areas Where Potential Spills and Leaks Might Occur.....	13
Table 4-2 Tank and Container Storage Exception Areas	14
Table 5-1 Spill Response Equipment	20
Table 5-2 Fire Response Equipment	20
Table 5-3 Personal Protective Equipment	20

Attachments

Appendix A	Unanticipated Discovery of Contamination Plan
------------	---

Acronyms and Abbreviations

A	acceptable
ABACT	antidegradation best available combination of technologies
BMP	best management practice
CFR	Code of Federal Regulations
EC	Emergency Coordinator
EPA	U.S. Environmental Protection Agency
ESCP	Erosion and Sediment Control Plan
HDD	horizontally directional drilling
ID	identification
MMDth/d	million dekatherms per day
MSDS	Material Safety Data Sheet
PADEP	Pennsylvania Department of Environmental Protection
PCB	polychlorinated biphenyl
PennEast	PennEast Pipeline Company, LLC
Plan	Preparedness, Prevention, and Contingency Plan
PPC	Preparedness, Prevention, and Contingency
PPE	personal protective equipment
Ppm	parts per million
Project	PennEast Pipeline Project
ROW	right-of-way
SOP	standard operation procedure
SPCC	Spill Prevention Control and Countermeasures
SPRP	Spill Prevention and Response Plan
U	unacceptable

1.0 OVERVIEW

PennEast Pipeline Company, LLC (PennEast) has prepared this Preparedness, Prevention, and Contingency (PPC) Plan (Plan) for the construction of the PennEast Pipeline Project (Project). The purpose of this Plan is to reduce the probability and risk of an accidental discharge of polluting materials, including oils and hazardous substances, to surface waters or groundwater by PennEast and/or Contractor(s) during construction-related activities by providing instruction and expediting spill response and clean-up.

This PPC Plan has been prepared to address Pennsylvania Department of Environmental Protection (PADEP) and federal pollution incident prevention and emergency response programs in one document. Per PADEP's *Guidelines for the Development and Implementation of Environmental Emergency Response Plans, Document 400-2200-001*, PADEP recommends that regulated facilities consolidate all required state and federal response plans into one single document. The operating procedures outlined in this Plan meet federal Clean Water Act (CWA) requirements for a Spill Prevention Control and Countermeasure (SPCC) Plan, PADEP's PPC Plan, and an Unanticipated Discovery of Contamination Plan (Appendix A).

The Contractor is primarily responsible for implementing the Plan. In the absence of a Contractor, PennEast shall be responsible for the assignments as they are laid out in this Plan. A copy of the Plan must be on site during active construction and should also be maintained at the closest construction field office.

2.0 FACILITY DESCRIPTION

PennEast Pipeline Company, LLC (PennEast) proposes to construct, install and operate an approximate 115-mile pipeline (Project or PennEast) extending from Luzerne County, Pennsylvania, to Mercer County, New Jersey. Approximately 77.3 miles of the pipeline is located in Pennsylvania, with approximately 22.8 miles in Luzerne County, approximately 27.9 miles in Carbon County, approximately 1.0 mile in Monroe County, approximately 23.8 miles in Northampton, and approximately 1.8 miles in Bucks County. The Project facilities include a 36-inch diameter pipeline to provide approximately 1.1 million dekatherms per day (MMDth/d) of year-round transportation services from northern Pennsylvania to markets in New Jersey, eastern and southeastern Pennsylvania and surrounding states. The 24-inch diameter Hellertown Lateral will be an approximately 2.1-mile new pipeline in Northampton County, Pennsylvania. The 4-inch diameter Blue Mountain Lateral will be an approximately 0.5 mile new pipeline in Carbon County, Pennsylvania.

During Project construction, groundwater or surface water contamination could occur from an inadvertent spill of fuel or hazardous liquids during refueling or maintenance of construction equipment. A spill could occur at any location within the construction workspace for the Project. This Plan outlines procedures for storing and handling hazardous liquids to minimize potential spills, as well as procedures that must be implemented in the event of an inadvertent release of hazardous materials to prevent groundwater or surface water contamination.

Any contaminated soils encountered during construction of the facilities for this Project will be managed in accordance with applicable federal and state regulations (e.g., 40 CFR 761) and the Unanticipated Discovery of Contaminated Soils Standard Operating Procedures found within Appendix A. Any undocumented sites that are found during construction will be avoided, or addressed in accordance with this Plan.

3.0 WASTE MANAGEMENT

This waste management section provides an overview and checklist to be used before each construction job. Each job might require different chemicals and equipment with different fuel requirements that must be documented, accounted for, and contained. Also included at the end of this section is the Weekly Hazardous Materials and Waste Inspection Log for weekly inspection of hazardous materials and waste.

3.1 Material and Waste Inventory

Prior to each construction job, the material and waste inventory must be completed. The inventory must be provided in Tables 3-1 to 3-4 below and might include the following:

- Nutrients, such as fertilizers and sanitary wastes;
- Solid waste, such as scrap metals, masonry products, and other raw construction materials and debris;
- Construction chemicals, such as paints, soils additives and acids for cleaning;
- Petroleum products, such as fuels and lubricants; and
- Other materials, including concrete wash from mixers and explosives.

The list must include oils and fuels, commercial chemicals, hazardous and nonhazardous wastes, and incompatible materials to be used or stored on site during construction.

**Table 3-1
List of Oil and Fuel to be Used or Stored On Site During Construction**

Type	Quantity	Containment Method	Location
Notes: A Material Safety Data Sheet (MSDS) for all hazardous substances listed in the above tables shall be provided by the contractor. All containers shall have temporary containment.			

**Table 3-2
List of Commercial Chemicals to be Used or Stored On Site during Construction**

Type	Quantity	Containment Method	Location

Type	Quantity	Containment Method	Location

Notes:
A MSDS for all hazardous substances listed in the above tables shall be provided by the contractor. All containers shall have temporary containment.

Table 3-3
List of Hazardous and Nonhazardous Wastes to be Used or Stored Onsite during Construction

Type	Quantity	Containment Method	Location

Notes:
A MSDS for all hazardous substances listed in the above tables shall be provided by the contractor. All containers shall have temporary containment.

Table 3-6
List of Large Spill Sources
(larger than 660 gallons or total capacity greater than 1,320 gallons)

Product	Total Quantity Storage Size, Type		Potential Direction of Flow	Maximum Rate of Flow	Structures or Equipment to Contain Spills	Location of Use
	Present	Location				

Note: All containers shall have temporary containment.

3.2 Hazardous Materials and Waste Inspections

The Contractor shall inspect weekly hazardous materials and waste and associated storage areas. These weekly inspections shall document the condition of the hazardous materials and waste and the associated storage containers. The Contractor shall file all inspection records. The Contractor shall provide a copy of the completed form to the Chief Inspector and Environmental Inspector on a weekly basis. The weekly inspection form is at the end of this section and titled *Weekly Hazardous Materials and Waste Inspection Log*.

Weekly Hazardous Materials and Waste Inspection Log

For each item listed below, the Contractor shall indicate whether existing conditions are acceptable (A) or unacceptable (U). Resolution of all unacceptable conditions must be documented. Contractor shall inspect all storage facilities on a regular basis, but not less than weekly. Contractor shall file all inspection records. Contractor shall provide a copy of the completed form to the Chief Inspector and Environmental Inspector on a weekly basis.

I. STORAGE AREAS FOR FUELS, LUBRICANTS, AND CHEMICALS

General

A/U

- Construction yard or storage areas secured
- National Fire Protection Association symbol posted in storage area or at yard entrance
- Storage areas properly prepared and signed
- Material Safety Data Sheets available
- Hazardous Materials Management Plan and Spill Prevention and Countermeasure Plan available

Hazardous Materials Management

A/U

- No evidence of spill or leaking materials
- Incompatible materials separated
- All containers labeled properly
- All containers securely closed
- All containers upright
- No evidence of container bulging, damage, rust, or corrosion

Secondary Containment Areas

A/U

- Containment berm intact and capable of holding 110 percent of material stored plus precipitation
- Lining intact
- No materials overhanging berms
- No materials stored on berms
- No flammable materials used for berms

Compressed Gases

A/U

- Cylinders labeled with contents
- Cylinders secured from falling
- Oxygen stored at least 25 feet away from fuel
- Cylinders in bulk storage are separated from incompatible materials by fire barriers or by appropriate distance

II. HAZARDOUS WASTE MANAGEMENT

Waste Container Storage

A/U

- No evidence of spilled or leaking wastes
- Adequate secondary containment for all wastes
- Separate containers for each waste watercourse (no piles)
- Waste area not adjacent to combustibles or compressed gases
- All containers securely closed
- Bungs secured tightly
- Open-top drum hoops secured
- All containers upright
- No evidence of container bulging or corrosion
- No severe damage or rust
- Containers are compatible with waste (e.g. plastic liner for corrosives, metal liner for solvents)
- No smoking and general danger and/or warning signs posted

Waste Container Labeling

A/U

- Containers properly labeled

Name, address, and U.S. Environmental Protection Agency identification (ID) number or ID number of generator listed (Not required if Contractor is an exempt small quantity generator)

- Accumulation start date listed
- Storage start date listed
- Chemical and physical composition of waste listed
- Hazardous property listed

Nonhazardous Waste Areas

A/U

- No litter in yard
- No hazardous wastes or used oil mixed with trash (e.g., contaminated soil, oily rags, diapers, or other oily materials)
- Empty oil and aerosol containers for disposal are completely emptied

III. EMERGENCY RESPONSE EQUIPMENT

A/U

- Shovels
- Absorbent materials (e.g., booms, pads, pillows, socks, “Speedy Dry”)
- Personal protective equipment (e.g., goggles, gloves)
- Fire-fighting equipment
- First aid supplies (e.g. medical supplies, squeeze bottle eye wash)
- Department of Transportation-approved containers
- Plastic sheeting, bags, and ties
- Communication equipment
- Bung wrench (nonsparking)

IV. CORRECTIVE ACTIONS TAKEN (Required for all unacceptable conditions)

Enter information here

Date:

Contractor Name:

Inspected by (Contractor’s Inspector):

Signature:

4.0 SPILL PLAN

This section of the PPC Plan describes spill preparedness, prevention, and containment. Spill preparedness and prevention training is also discussed in this section.

4.1 Spill and Leak Preparedness and Prevention

4.1.1 Employee Training

Prior to construction, contractors and PennEast personnel shall be trained in hazardous waste management procedures that will enable them to respond effectively to emergencies by familiarizing them with emergency procedures, equipment, and communication systems. Personnel who handle, sample, or come in direct contact with oils or hazardous matter shall undergo basic training that stresses the importance of pollution control. Spill prevention control procedures shall be thoroughly explained during the training briefings, which will be conducted by the Contractor Superintendent (Contractor Emergency Coordinator [EC]), the PennEast Chief Inspector, and the PennEast EC or their designated representative on the job site. The PennEast EC shall maintain training verification.

Prior to construction, all project Chief and Environmental Inspectors shall receive a copy of this PPC Plan and an approved list of emergency response contractors (page 4-7). Inspectors shall be trained on equipment maintenance, fuel and hazardous material handling, spill prevention procedures, and spill response.

All personnel involved in constructing the proposed facilities shall be aware of the PPC Plan. Regular training briefings shall be conducted on an as-required basis by the Contractor Superintendent and the PennEast Chief Inspector on the job site. These briefings shall include the following:

- Precautionary measures to prevent spills
- Potential sources of spills, including equipment failure and malfunction
- Standard operating procedures (SOPs) in the event of a spill
- Applicable notification requirements
- Equipment, materials, and supplies available for spill clean-up

4.1.2 Security

Hazardous wastes and waste containing polychlorinated biphenyls (PCBs) greater than 50 parts per million (ppm) shall be stored in a secured location (i.e., fenced, locked). Fuel storage areas shall be located to minimize, as much as possible, tampering by unauthorized personnel during nonoperational hours.

4.1.3 Prevention and Preparedness

A discharge from the construction site into waters of the state, while unlikely, may occur. The construction site shall have onsite spill prevention and control facilities and routinely inspect tank and container storage areas (inspection form: Weekly Hazardous Materials/Waste Inspection Log included in Section 2), which will mitigate the potential for oil and hazardous material to be released to soil or surface waters. In areas where hazardous materials are required to be stored or used within a wetland, the Contractor shall prepare and submit for approval a secondary containment plan before working in the wetland area.

Generally, minor spills or leaks shall be contained within secondary containment areas. In Pennsylvania, all spills greater than 5 gallons of petroleum or hazardous materials must be reported. The PADEP encourages incident commanders to also notify PADEP of the following scenarios:

- All spills in excess of five gallons of any hazardous material;
- All petroleum spills of five gallons or more with potential to pollute;
- Air pollution incidents where there might be a release of a toxic substance or where smoke from a fire might create a public nuisance;
- Incidents that involve illegal and/or improper disposal of any material; and
- Areas where potential spills and leaks might occur should be listed in **Table 4-1**.

**Table 4-1
Areas Where Potential Spills and Leaks Might Occur**

Location/Use or Equipment	Quantity/Reportable Quantity	Containment Method	Product
	/		
	/		
	/		
	/		

Note: All containers shall have temporary containment.

4.1.4 Tanks

The Contractor shall take the following precautions to prevent a spill from occurring within tank storage areas:

- Only those tanks for fuel and material storage that meet PennEast approval shall be operated.
- Single-wall tanks shall be provided with temporary secondary containment that will hold at least 110 percent of the tank capacity of the largest tank inside the containment area.
- Precipitation shall be inspected first for evidence of oil, including a sheen, or other contaminants. If a sheen or other indicators of oil or contamination is present, then the material shall be collected for proper disposal off site. Any precipitation shall be removed from the containment area to maintain the available containment volume at 110 percent of the volume of material stored.
- Only self-supporting tanks constructed of carbon steel or other materials compatible with the contents of each tank shall be used.
- PCB (50 ppm or greater) storage tanks shall be double-walled or have secondary containment that will hold 200 percent of the tank capacity.
- Elevated tanks shall be a maximum of 2 feet above grade.
- Tank storage shall be located in areas that are at least 100 feet from all waterbodies, wetlands, and designated municipal watershed areas, with certain exceptions as approved by the Contractor EC (**Table 4-2**).
- All tanks shall be inspected daily for leaks and deterioration by the Contractor EC or designee. The results of all inspections shall be recorded on the Weekly Hazardous Materials and Waste Inspection Log (included at the end of Section 2). Copies of the log for unsatisfactory storage area inspections shall be distributed to PennEast’s EC and the Project Manager. Leaking and/or deteriorated tanks shall be repaired or replaced as soon as the condition is first detected.
- Tanks and secondary containment drains shall remain closed when not in use.
- Vehicle-mounted tanks shall be equipped with flame and/or spark arrestors on all vents to prevent self- ignition.

- Incompatible materials shall not be stored in sequence in tanks prior to decontamination. A list of incompatible materials is listed in Section 3, Waste Management, Table 3-4.
- Tanks used to store hazardous materials shall be decontaminated before they are used at a different construction location if they could contaminate the next material to be placed in the tank. The tanks shall be decontaminated if they are to be returned to a vendor. The tanks shall also be decontaminated if they are being returned to a PennEast yard and no immediate specific same service use is scheduled.
- If a tank contains hazardous material, then the PennEast EC shall be contacted, and transportation shall follow the steps outlined in PennEast’s Environmental SOP regarding Waste Transportation.

**Table 4-2
Tank and Container Storage Exception Areas**

Material	Quantity	Containment Method	Location

Note: Exception areas must be approved by the EC.

4.1.5 Containers

The Contractor shall take the following precautions to prevent a spill from occurring within container storage areas:

- For drum storage, reference PennEast’s Environmental SOPs; PennEast EC shall a copy of the current Environmental SOPs.
- Containers shall remain closed when not in use.
- All containers shall have temporary containment. A list of temporary containment is listed in Section 3, Waste Management, Tables 3-1 through 3-4.
- Small cans of gasoline, diesel, solvents, and other hazardous materials shall be stored within the temporary containment or within secured trailers or vehicles when not in use.
- Incompatible materials shall not be in sequence in containers before decontamination. A list of incompatible materials is included in Section 3, Waste Management, Table 3-4.
- Containers used to store hazardous materials shall be decontaminated before they are used at a different construction location if they could contaminate the next material to be placed in the container. The containers shall always be decontaminated if they are being returned a PennEast yard and no immediate specific same service use is scheduled.
- If a container contains a hazardous material, then transportation shall follow the steps outlined in PennEast’s Environmental SOPs regarding Waste Transportation.
- No incompatible material shall be stored together in the same containment area.
- Leaking and/or deteriorated containers shall be replaced as soon as the condition is first detected.

- Containers shall be stored in areas that are at least 100 feet from all waterbodies, wetlands, and designated municipal watershed areas, with certain exceptions as approved by the Contractor EC as listed in Table 4-2.
- All container storage and containment areas shall be used to store waste or products according to the guidelines described in PennEast's Environmental SOPs regarding Facility Inspections.

4.1.6 Loading and Unloading Areas

The Contractor shall take the precautions listed below to prevent a spill from occurring within loading and unloading areas when those areas are located at the construction site; PennEast personnel shall be present during loading and unloading activities:

- Liquids shall be transferred and refueling shall only occur in predesignated and preapproved locations that are at least 100 feet from all waterbodies and wetlands. Exceptions might be approved by the Environmental Inspector if no reasonable alternatives are available and secondary containment is used. Certain exceptions are listed in Table 4-2.
- All loading and unloading areas shall be closely monitored to prevent any leaks and spills.
- The area beneath loading and unloading location shall be inspected for spills before and after each use.
- All hose connections shall use drip pans at the hose connections while loading and unloading liquids. If a leak or spill occurs, then the loading and unloading operation shall be stopped and the spill shall be contained, cleaned up, and collected before operations continue.
- All tank truck outlets shall be inspected before trucks leave the loading and unloading area to prevent possible leakage from the truck while in transit.
- Each refueling vehicle shall have a sufficient number of shovels, brooms, 10-millimeter polyethylene sheeting, and fire protection equipment to contain a moderate oil and/or fuel spill.
- Any service vehicle used to transport lubricants and fuel shall be equipped with an emergency response kit, and this kit, at a minimum, must include the following:
 - 25 pounds of granular oil absorbent
 - Ten (10) 48-inch x 3-inch oil socks
 - Five (5) 17-inch x 17-inch oil pillows
 - One (1) 10-inch x 4-inch oil boom
 - Twenty (20) 24-inch x 24-inch x 3/8-inch oil mats
 - Garden-size, 6-millimeter polyethylene bags
 - Ten (10) pair of latex gloves
 - One (1) 55-gallon polyethylene open-head drum

In addition, a smaller chemical response kit shall be available that contains the following:

- One (1) bag of loose chemical pulp
- Two to three (2 to 3) 17-inch x 17-inch chemical pillows
- Two (2) 48-inch x 3-inch chemical socks
- Five (5) 18-inch x 18-inch x 3/8-inch absorbent mats
- Garden-size, 6-millimeter, polyethylene bags

- Ten (10) pair of latex gloves
- One (1) 30-gallon polyethylene open-head drum
- Hazardous waste labels

4.1.7 Concrete Coating Areas for Field Joints

Concrete coating of field joints shall be performed **at least 100 feet from the edge of all waterbodies**. Where topographic conditions and/or work space limitations necessitate applying concrete coating within 100 feet of a watercourse, sufficient containment measures shall be implemented to eliminate the spill of any concrete coating materials into a wetland or watercourse. Containment such as the following (or equivalent as approved by the PennEast EC in a secondary containment plan to be submitted by the Contractor) shall be used:

- Concrete coating materials shall be temporarily stored in an earthen berm with a polyethylene lining of 10-millimeter thickness or in a portable containment tray constructed of steel plate measuring a minimum of 4-feet-square by 1-foot-deep.
- Portable-mechanical mixing equipment, if required, shall be operated within a containment area constructed of temporary earthen berms and polyethylene underling lining a minimum of 10-millimeter thickness.
- Concrete materials in a portable container (such as a 55-gallon drum cut in half or equivalent) shall be mixed within an earthen berm with polyethylene lining of 10-millimeter thickness or within a portable containment tray constructed of steel plate, measuring a minimum of 4-feet-square by 1-foot-deep.

4.1.8 Equipment Inspections

All construction equipment in use on the pipeline right-of-way (ROW) shall be inspected daily. Any leaks shall be repaired immediately or the piece of equipment shall be removed from service, removed from the ROW, and repaired prior to returning to service. All inspections shall be documented on a daily leak report submitted to PennEast.

4.1.9 Emergency Equipment

The construction site and/or contractor yard shall have adequate manpower and equipment necessary to divert any spilled material from waterbodies and wetland areas. Emergency equipment shall include, but is not limited to, shovels, backhoes, dozers, front-end loaders, oil-absorbent booms, pillows, socks and/or mats, granular oil absorbent, and chemical absorbent pulp. A list of emergency response equipment and personal protective equipment (PPE) is provided in Section 5.3.

4.1.10 Contractor's Site Map

The Contractor shall prepare a site map before construction begins. At a minimum, the Contractor's site map shall include the following:

- Orientation and scale
- Total land area in square feet
- Access and egress points
- Buildings and/or temporary trailers
- Parking lots
- Adjacent land uses (if business, indicate business name)
- Surrounding roads, storm drains, and waterways (e.g., waterbodies and wetlands)

- Locations of hazardous materials and waste storage
- Underground and aboveground tanks
- Containment or diversion structures (e.g., dikes, berms, retention ponds)
- Shutoff valves and/or circuit breakers
- Location of emergency response materials and equipment
- Location of MSDS and PPC Plan
- Location of emergency assembly area

4.2 Housekeeping Program

The construction area shall be maintained in a neat and orderly manner. Solid wastes, such as food wrappings, cigarette butts and packets, Styrofoam cups and plates, and similar wastes, shall be disposed of offsite and not in any construction excavation area. Any spills or leaks shall be cleaned up as expeditiously as possible. Trash shall be routinely collected for off-site disposal. Container storage areas shall be maintained in a neat and orderly manner.

5.0 CONTINGENCY PLAN AND EMERGENCY PROCEDURES

Emergency response procedures have been developed for the project to guide responses to fires, explosions, releases of oils or hazardous waste to the air, land, or waters of the state regardless of the quantity involved in the incident. For unanticipated release of hydrostatic test waters, PennEast shall utilize best management practices (BMPs), as described in the Erosion and Sediment Control Plan (ESCP) as soon as possible after the release.

5.1 Responsibilities of PennEast and Contractor Personnel

The Contractor and PennEast on-site personnel shall be responsible for PPC. If notification is given that an evacuation is necessary, all personnel shall evacuate the construction area via the primary evacuation route (site-specific map with evacuation route to be attached for plant projects) and await further instructions from the EC. If direct access to the primary evacuation route is restricted by fire, spill, smoke, or vapor, facility personnel shall evacuate the facility via alternate evacuation routes to the nearest accessible open area.

5.2 First Responder

Any individual who first observes a spill or any other imminent or actual emergency situation shall take the following steps:

1. Assess the situation to determine if the situation poses an immediate threat to human health or the environment.
2. Identify hazardous substances involved, if any.
3. Report the emergency or spill to the PennEast and Contractor EC(s) immediately.
4. Standby at a safe distance and keep others away.
5. Activate emergency shutdown, if necessary.

The Contractor Superintendent shall act as the EC for the Contractor. The Chief Inspector shall act as the EC for PennEast. The responsibilities of the EC are presented in the remainder of this section.

5.2.1 Contractor EC Responsibilities

The Contractor EC shall coordinate the response to all spills that occur as a result of Contractor operations. The Contractor shall not coordinate the response of spills of pipeline liquids, hazardous wastes, or the unanticipated release of hydrostatic test waters; these spills shall be coordinated by the PennEast EC.

Following are specific Contractor EC responsibilities:

1. Determine any immediate threat to human health, the environment, and the neighboring community.
2. Ensure personnel safety and evacuate, if necessary.
3. Identify source, character, amount, and extent of release.
4. Determine if hazardous substances are involved.
5. Inform the PennEast EC and follow instructions.
6. Direct and document remediation efforts to contain and control spill release.
7. Document remedial efforts.
8. Coordinate cleaning and disposal activities.

5.2.2 PennEast Responsibilities

The PennEast EC shall coordinate clean-up of all spills of pipeline liquids, hazardous wastes, and any unanticipated release of hydrostatic test water.

5.2.3 PennEast EC Responsibilities

Upon notification of pipeline liquid spills, hazardous materials spills, or the unanticipated release of hydrostatic test waters, the PennEast EC shall be responsible for the following:

1. Assess situation for potential threat to human health, environment, and the neighboring community.
2. Implement evacuation, if necessary,
3. Ensure personnel safety,
4. Control source as conditions warrant,
5. Immediately notify supervisory personnel immediately for spills that meet the following criteria:
 - a. One (1) pound or more of a solid material [excluding horizontal directional drilling (HDD) mud] spilled on land
 - b. Five (5) gallons or more of a liquid spilled on land
 - c. Any substance that creates a sheen on water
 - d. Air pollution incidents where there might be a release of a toxic substance.
 - e. Unanticipated release of hydrostatic test water
6. If necessary, notify the local fire department, law enforcement authority, or health authority as appropriate, and provide the following information:

- a. Name of the caller and call back number
 - b. The exact location and nature of the incident
 - c. The extent of personnel injuries and damage
 - d. The extent of release
 - e. The material involved and appropriate safety information
7. Ensure that any waste or product that might be incompatible with a released material is kept away from the affected area.
 8. Keep any potential ignition source away from emergency area, if spilled material is flammable.
 9. Minimize affected area with appropriate containment or diking.
 10. Assemble required spill response equipment as required (e.g., protective clothing, gear, heavy equipment, pumps, absorbent material, and empty drums).
 11. Place spilled material in appropriate containers, in accordance with the PennEast Environmental SOPs.
 12. Label and store containers in accordance with the PennEast Environmental SOPs.
 13. Coordinate waste disposal and equipment decontamination.
 14. Terminate response.
 15. Ensure that all emergency response equipment is fully functional. Any equipment that cannot be reused shall be replaced.
 16. For PCB spills, follow special spill response requirements related to PCB spills.
 17. Assist with the coordination of clean-up and disposal activities as described in Sections 5.4, 5.5, and 5.6.
 18. If necessary, contact outside remediation services to assist with clean-up.
 19. Complete Waste Removal Storage and Disposal Record Form to track waste generated during this project.
 20. Complete Field Spill Report (included at the end of this section) and distribute accordingly.
 21. For unanticipated release of hydrostatic test waters, notify state contact if required by state permit in accordance with timeframes required by state permit.
 22. As required by permit, arrange for immediate sampling of the test water (from the pipe or a representative sample of released water where possible) or soil where the test water was released and water from adjacent watercourse if test water was released into the watercourse. Samples shall be analyzed in accordance with hydrostatic test discharge permit criteria.
 23. A PennEast representative shall notify the municipal manager and/or mayor.

5.3 Emergency Equipment

The construction site and /or Contractor yard shall have adequate personnel and equipment necessary to divert any spill from waterbodies and wetland areas. Emergency equipment shall include, but is not limited to, shovels, backhoes, dozers, front-end loaders, oil absorbent booms, pillows, socks and/or

mats, granular oil absorbent, and chemical absorbent pulp. Tables 5-1 – 5-3 list emergency response equipment and PPE (to be completed by Contractor).

**Table 5-1
Spill Response Equipment**

Equipment	Quantity	Location

**Table 5-2
Fire Response Equipment**

Equipment	Quantity	Location

**Table 5-3
Personal Protective Equipment**

Equipment	Quantity	Location

5.4 Spill Clean-Up/Waste Disposal Procedures

The following identifies the clean-up and control measures to be used in the event of a spill of oil, fuel, or hazardous substance or unanticipated release of hydrostatic test water.

5.4.1 Oil and/or Fuel Spills

- Ensure no immediate threat to surrounding landowners or environment.

- Remediate small spills and leaks as soon as feasible. Use absorbent pads whenever possible to reduce the amount of contaminated articles.
- Restrict the spill by stopping or diverting flow to the oil and/or fuel tank.
- If the release exceeds the containment system capacity, immediately construct additional containment using sandbags or fill material. Every effort must be made to prevent the seepage of oil into soils and waterways.
- If a release occurs into a facility drain or nearby watercourse, immediately pump any floating layer into drums. For high-velocity watercourses, place oils booms or hay bales between the release area and the site boundary and downstream of affected area. As soon as possible, excavate contaminated soils and sediments.
- After all recoverable oil has been collected and drummed, place contaminated soils and articles in containers.
- For larger quantities of soils, construct temporary waste piles using plastic liners and place the contaminated soils on top of the plastic and covered by plastic. Plastic-lined, roll-off bins should be leased for storing this material as soon as feasible.
- Label the drum following the procedures outlined in the PennEast's Environmental SOPs.
- Move drum to secure staging or storage area.
- Document and report clean-up activities of the PennEast EC as soon as feasible.
- If environmentally sensitive resources (e.g., wetlands, waterbodies) exist in the area, ensure that BMPs as described in the ESCP are used to minimize impact to these resources.

5.4.2 Hazardous Substance Releases

- Ensure no immediate threat to surrounding landowners or environment.
- Identify the material and quantity released.
- Block off drains and containment areas to limit the extent of the spill. Never wash down a spill with water.
- Ensure that PPE and containers are compatible with the substance.
- Collect and reclaim as much of the spill as possible using a hand pump or similar device. Containerize contaminated soils in an appropriate DOT container in accordance with the PennEast's Environmental SOPs. (Note: Environmental SOP's are located in all division and area offices and kept by all engineering teams.) Never place incompatible materials in the materials in the same drum.
- Sample the substances for analysis and waste profiling.
- Decontaminate all equipment in a contained area and collect fluids in drums.
- Label the drum.
- Move the drum to secure staging or storage area.
- Document and report activities to the PennEast EC as soon as feasible.
- If environmentally sensitive resources (wetlands, waterbodies) exist in the area, then ensure that BMPs as described in the ESCP are used to minimize impacts to these resources.

5.4.3 Unanticipated Release of Hydrostatic Test Water

- Ensure no immediate threat to surrounding landowners or environment.
- If environmentally sensitive resources (wetlands, waterbodies) are located in the area, then ensure that BMPs as described in the ESCP are used to minimize impacts to these resources.

5.5 Disposal of Contaminated Materials and/or Soils

- The Contractor shall work with the PennEast EC to characterize waste generated during this project. All wastes generated as a result of spill response activities shall be analyzed to determine if hazardous or if PCBs are greater than 1 ppm. Knowledge of the contaminant(s) might be applied to classify the waste and spill materials as determined by the PennEast EC.
- The Contractor is responsible for properly disposing of wastes generated during this project that is determined by the PennEast EC to be nonhazardous and to contain PCBs less than 1 ppm; this includes obtaining applicable authorizations and registrations for waste disposal.
- The PennEast EC is responsible for the properly disposing of hazardous and PCB-containing wastes containing greater than 1 ppm generated during this project, including obtaining applicable U.S. Environmental Protection Agency (EPA) ID numbers.
- Hazardous and PCB-containing waste shall be stored in a secured location (i.e. fenced, locked) until the material is transported off site. At no time shall hazardous waste be stored for more than 90 days nor a PCB containing waste with more than 50 ppm be stored for more than 30 days.

5.6 Equipment Cleaning/Storage

- Upon completion of remedial activities, the Contractor shall decontaminate emergency response equipment used to remediate a spill resulting from their operations. PennEast shall be responsible if the spill is hazardous material, pipeline liquids, or hydrostatic test water.
- PennEast shall be responsible for disposing of any contaminated waste generated as a result of the decontamination process.
- The Contractor shall replace all spent emergency response equipment prior to resuming construction activities if spill resulted from their operations.
- The Contractor shall test and inventory reusable PPE prior to being placed back into service.

Petroleum and Hazardous Material Spill Report

The Contractor must complete this for any petroleum or hazardous material spill regardless of size, and submit the form to the PennEast EC within 48 hours of the occurrence.

Date of Spill: _____ Incident No.: _____ Date of spill discovery: _____

Time of Spill: _____ Time of spill recovery: _____

Location Name: _____ Spread: _____ County: _____

Section: _____ Township: _____ Range: _____

Name and title of discoverer: _____

Type of material spilled and product name: _____

Manufacturer's name: _____

Legal description of spill location: _____

Directions from nearest community: _____

Estimated volume of spill: _____ Weather conditions: _____

Topography and surface conditions of spill site: _____

Spill medium (e.g., pavement, sandy soil, water): _____

Proximity of spill to surface waters or wetland: _____

Did the spill reach a watercourse? Yes No

If so, was a sheen present? Yes No

Direction and time of travel (if in watercourse): _____

Name and telephone number of responsible party: _____

Causes and circumstances resulting in the spill: _____

Extent of observed contamination, both horizontal and vertical (e.g., spill-stained soil in a 5-inch radius to a depth of 1 inch): _____

Potentially affected resources and installations: _____

Potential impact on human health: _____

Immediate spill control and/or clean-up methods used and implementation schedule: _____

Current status of clean-up actions: _____

Name, company, address, and telephone number for the following:

Construction Superintendent: _____

Spill Coordinator: _____

Person who reported the spill: _____

Environmental Inspector: _____

On-Scene Agency Coordinator (where applicable): _____

Form completed by: _____ Date _____

6.0 REGULATORY COMPLIANCE

This section provides the user with a high-level overview of the regulatory requirements addressed in this PPC Plan. This section is arranged by activity, in typical order or occurrence by job, with the corresponding regulation and promulgating authority.

Regulatory Compliance by Activity			
Activity Type	Federal Regulation Citation	State Regulation Citation	Plan Section
General Applicability			
Is facility under purview of regulations?	40 CFR 112 40 CFR 264, Subpart D 40 CFR 265, Subpart D	25 PA Code 245	
Does facility comply with applicable regulations?	40 CFR 112 40 CFR 264, Subpart D 40 CFR 265, Subpart D	25 PA Code 245	
Materials Storage and Handling			
Material and Waste Inventory	40 CFR 112	25 PA Code 245 ¹	Spill Plan Waste Management
Material Transport and Disposal	40 CFR 112	25 PA Code 2451	Contingency Plan
Spill Prevention and Containment			
Emergency Response Contacts	40 CFR 112 40 CFR 264, Subpart D 40 CFR 265, Subpart D	25 PA Code 245 ¹	Spill Plan
Training	40 CFR 112	25 PA Code 245 ¹	
Security	40 CFR 112	25 PA Code 245	
Prevention and Preparedness	40 CFR 11240 CFR 264, Subpart D 40 CFR 265, Subpart D	25 PA Code 245	
Facility Information	40 CFR 112	25 PA Code 245 ¹	
Facility Drainage and Routes of Flow	40 CFR 112	25 PA Code 245 ¹	
Inspections and Reporting			
Emergency Response Contacts	40 CFR 112 40 CFR 264, Subpart D 40 CFR 265, Subpart D	25 PA Code 245 ¹	Spill Plan Contingency Plan
Inspections, Tests, and Records	40 CFR 112	25 PA Code 245	
Discharge Reporting	40 CFR 112 40 CFR 264, Subpart D 40 CFR 265, Subpart D	25 PA Code 245	

Regulatory Compliance by Activity			
Activity Type	Federal Regulation Citation	State Regulation Citation	Plan Section
Spills and Response			
Emergency Procedures and Response	40 CFR 112 40 CFR 264, Subpart D	25 PA Code 245 ¹	Spill Plan Contingency Plan
Discharge Notification	40 CFR 112	25 PA Code 245	
Clean-up	40 CFR 112	25 PA Code 2451	
Wastewater Discharge			
Facility Drainage	40 CFR 112	25 PA Code 2451	Spill Plan
¹ if Spill Prevention and Response Plan (SPRP) is required			

Attachment A

Unanticipated Discovery of Contamination Plan

Unanticipated Discovery of Contamination Plan Introduction

The purpose of this Unanticipated Discovery of Contamination Plan (Plan) is to provide work, investigation and reporting procedures for responding to the unanticipated discovery of contamination in soil, groundwater or sediment during excavation, construction or maintenance activities associated with construction of the PennEast Pipeline Project.

Consistent with this purpose, the objectives of this Plan are to protect the health and safety of project personnel and the environment and to prevent the spread of contamination during and after an unanticipated discovery of contamination.

The greatest potential for the discovery of unanticipated contamination will occur during the excavation of the pipeline trench and the horizontal directional drilling procedures. If any project personnel detects potential contamination such as:

- Odor;
- Visible staining on soil;
- Sheen on ground or purge water;
- Unidentified underground service tank;
- Potential cultural resources, including human remains; etc.,

the following response plan will be executed.

Unanticipated Discovery Response Plan

Stage 1 – Suspend Work Activities

All construction and/or maintenance work in the immediate area of the discovery shall stop. Personnel shall move to upwind areas as necessary.

Stage 2 – Identify Immediate Threats

If an immediate threat is detected, emergency response (i.e., 911) shall be notified. The area shall be evacuated.

Stage 3 – Identify and Secure Area

If safe to do so, the area immediately around the potential contamination shall be secured with safety fencing or flagging. Site personnel shall remain onsite to restrict access as appropriate.

Stage 4 – Conduct Notifications

Appropriate PennEast environmental professionals and officials shall be notified of the potential contamination. It shall be the decision of the PennEast environmental professional (TBD) to determine environmental agency or public official notification requirements.

PennEast Management and Field Personnel are currently being identified.

Stage 5 – Discovery Documentation Protocol

An appropriate PennEast employee or designee will document the unanticipated contamination utilizing the attached Worksheet 1. Worksheet 1 includes instructions for the appropriate PennEast employee or designee to record the site name, locations, and how suspected contamination was determined. The PennEast employee or designee will coordinate with the construction contractor(s) who identified the contamination to assist in completing Worksheet 1.

Stage 6 – Remedial Action Planning

An onsite meeting (if appropriate) will be conducted among site personnel, PennEast environmental professionals, and any appropriate contamination response contractors to determine remediation requirements and methodologies. If remediation activity is appropriate, an environmental consultant (if appropriate) should be contacted to assist with the remedial activity. Remedial activities should be conducted according to the following general sequence of events. This is a general plan and is not meant to apply to all contamination situations. A more robust, site-specific remedial action plan should be completed by an environmental consultant prior to completing remedial activities.

Step 1: Sampling – Representative samples should be collected and submitted to an environmental laboratory for analysis and/or waste classification. Results of this analysis may dictate notification requirements. An environmental consultant can assist in the determination of these requirements.

Step 2: Remedial Action Determination – Following laboratory analysis, the PennEast environmental professional and/or the environmental consultant will evaluate the analysis results and, if appropriate, identify the type of remediation (in-situ, removal, etc.) to be completed.

Step 3: Remedial Action – PennEast will mobilize an appropriate contractor and remediation activities will be conducted. Any soil and/or groundwater suspected of containing contamination will be segregated from clean soil and/or water using plastic sheets, fractionation tanks, or other appropriate methodologies. Containers will be clearly labeled. Known hazardous wastes will be labeled and separated with orange construction fencing.

Step 4: Disposal – Wastes will be disposed of properly at a permitted facility. PennEast environmental professional or its environmental consultant will determine disposal requirements.

Stage 7 – Record Keeping

A record of the sequence of events from the beginning (unanticipated discovery) to the end (disposal) of the incident will be recorded and kept on file with the PennEast environmental professional in accordance with all mandated record keeping requirements.

Worksheet 1 – Unanticipated Discovery of Contamination Documentation Worksheet

Instructions: Complete this worksheet to document an unanticipated discovery of contamination event. Use a separate sheet (copy) for each occurrence.

A. Site Name, Physical Location, and Milepost

B. How Suspected Contamination was Determined (odor, stain, sheen, etc.). Include photographs as appropriate.

C. List dates, times, and officials notified

Environmental Response Contact Sheet

PennEast Management and Field Personnel are currently being identified.