



**Application of Tennessee Gas Pipeline Company for
a Certificate of Public Convenience and Necessity**

FERC Docket No. PF09-1

300 LINE PROJECT
Pennsylvania and New Jersey

VOLUME IIA – APPENDIX E

**SPILL PREVENTION CONTROL AND
COUNTERMEASURE PLAN**

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SPILL PREVENTION CONTROL AND COUNTERMEASURE PLAN

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SPILL PREVENTION CONTROL AND COUNTERMEASURE PLAN

1. PREVENTATIVE MEASURES

The spill prevention and control methods listed in this section are based on approved spill control plans that the Company has used successfully in the past. This plan is comprehensive in that it addresses actions used to *prevent* spills in addition to specifying actions that will be taken should any spills occur, including emergency notification procedures. The Project's on-site Environmental Inspector (EI) is responsible for ensuring that Contractors implement and maintain spill control measures. The responsibilities of these inspectors are described in Tennessee Gas Pipeline Company's (Tennessee) 300 Line Project Environmental Construction Plan (ECP).

1.1 TRAINING

The Contractor will instruct personnel on the operation and maintenance of equipment to prevent the accidental discharge or spill of fuel, oil, and lubricants. Personnel will also be made aware of the pollution control laws, rules, and regulations applicable to their work.

Spill prevention briefings with the construction crew will be scheduled and conducted by the Contractor to insure adequate understanding of spill prevention measures. These briefings will highlight:

- precautionary measures to prevent spills;
- sources of spills, such as equipment failure or malfunction;
- standard operating procedures in case of a spill;
- equipment, materials, and supplies available for clean-up of a spill; and
- a list of known spill events.

A spill is an un-permitted release of product, raw materials, or chemicals outside any secondary containment and into the environment. Spills can occur as a result of leaks, accidents, or third party incidents.

1.2 EQUIPMENT INSPECTION/MAINTENANCE

The Contractor will inspect and maintain equipment that must be fueled and/or lubricated according to a strict schedule. The Contractor will submit to the Company for approval written documentation of the methods used and work performed.

All containers, valves, pipelines, and hoses will be examined regularly to assess their general condition. The examination will identify any signs of deterioration that could cause a spill and signs of leaks, such as accumulated fluids. All leaks will be promptly corrected and/or repaired.

1.3 REFUELING

- (1) The Contractor will insure that equipment is refueled and lubricated within the ROW, compressor station yard, meter station site, or fee property and at least 100 feet away from all waterbodies and wetlands with the following exceptions:
- The EI finds, in advance, that no reasonable alternative is available and the Contractor and Company have taken appropriate steps (including secondary containment structures) to prevent spills and provide for prompt cleanup in the event of a spill;
 - Areas such as rugged terrain or steep slopes where movement of equipment to refueling stations would cause excessive disturbance to the ROW or workspace;
 - Areas where removing equipment from a wetland for servicing would increase adverse impacts to the wetland;
 - Sites where moving equipment to refueling stations from pre-fabricated equipment pads is impracticable or where there is a barrier from the waterbody/wetland (i.e., road or railroad);
 - Locations where the waterbody or wetland is located adjacent to a road crossing, compressor station yard, or meter station site (from which the equipment can be serviced); and
 - Refueling of immobile equipment including, but not limited to, bending and boring machines, air compressors, padding machines, and hydro-test fill pumps.

In these areas, auxiliary fuel tanks will be used to reduce the frequency of refueling operations and in no case will refueling take place within 100 feet of any known potable water wells.

- (2) The Contractor will assure that all refueling is done pursuant to the following conditions:
- Impact minimization measures and equipment will be sufficient to prevent discharged fluids from leaving the ROW, compressor station yard, meter station site, or workspace or reaching wetlands or waterbodies, and be readily available for use. These will include some combination of the following:
 - a. dikes, berms or retaining walls sufficiently impervious to contain spilled oil;

- b. sorbent and barrier materials in quantities determined by the Contractor to be sufficient to capture the largest reasonably foreseeable spill;
 - c. drums or containers suitable for holding and transporting contaminated materials;
 - d. curbing;
 - e. culverts, gutters, or other drainage systems;
 - f. weirs, booms, or other barriers;
 - g. spill diversion or retention ponds; and
 - h. sumps and collection systems.
- All spills will be cleaned up immediately. Containment equipment will not be used for storing contaminated material.
- (3) The Contractor will prepare for approval by the Company a list of the type, quantity, and the storage location of containment and clean up equipment to be used during construction.

1.4 STORAGE

Storage containment areas will not have drains, unless such drains lead to a containment area or vessel where the entire spill can be recovered.

1.5 PERSONNEL SUPPORT

Prior to construction, the ROW inspector or agent shall identify and prepare a written inventory of water wells within 150 feet of the construction site. The Construction ROW Agent will notify the authorities of all potable water supply intakes located within three miles downstream of any crossings a minimum of one week prior to construction.

2. IMPACT MINIMIZATION MEASURES

Containment is the immediate priority in the case of a spill. A spill will be contained on the Company's property, ROW, compressor station yard, meter station site, or workspace, if possible. Clean up procedures will begin immediately after a spill is contained. In no case will containment equipment be used to store contaminated material.

Immediately report any spill or release of the following materials *regardless of location* (on-property or off-property) to the EI for notification to the appropriate Company representative as indicated below:

- Oil or petroleum products;
- Hazardous substances or hazardous wastes;
- Chemicals;
- Unplanned natural gas (flaring or venting); and,
- Asbestos-containing materials.

The following contacts are currently assigned to the Project and are subject to change (call in the order listed until someone is reached):

El Paso Corporation Field or Area Office (Location)

General Office Number: Number
Compliance Supervisor: Kelley Beavers (205) 325-3784
Field Env. Coordinator: Name & Number
Div. General Manager: Name & Number

El Paso Corporation Houston Office (Houston, Texas)

General Dept. Number: (713) 420-7340
Environmental Coordinator: Melissa Dettling (713) 420-3428
Department Manager: Jon Barfield (713) 420-7902
Department Director: Tom Hutchins (713) 420-7918

If a spill enters a body of water, the Contractor will immediately take samples upstream and downstream from point of entry and refrigerate samples. If advised, additional analysis will be completed and/or additional samples will be gathered.

If the EI agrees and the Contractor determines that a spill is small enough such that the construction crew can safely handle it, the crew will use construction equipment to containerize all spilled material, contaminated soil, and sorbent material in a manner consistent with the spilled materials' characterization.

If the EI agrees and the Contractor determines that a spill can not be adequately excavated and disposed of by the construction crew alone, the Contractor will contact waste containment specialists. The Contractor will ensure that all excavated wastes are transported to a Company approved disposal facility licensed to accept such wastes. Wastes will not be transported to a company facility (i.e., Compressor Station, Meter Station Facility, etc.) unless the Field Environmental Coordinator approves it in writing.

The Contractor will prepare a Construction Site Spill Report form to be given to the Company that includes:

- a. the date, time and location of the occurrence or discovery of the occurrence;

- b. a description or identity of the material spilled;
- c. an estimate of the quantity spilled;
- d. the circumstances that caused the spill (e.g., equipment failure);
- e. a list of waterbodies affected or potentially affected by the spill;
- f. a statement verifying whether a sheen is present;
- g. the size of the affected area;
- h. an estimate of the depth that the material has reached in water or on soil;
- i. a determination of whether the spill will migrate off of the Company's property or the ROW or workspace;
- j. a determination of whether the spill is under control;
- k. a statement verifying that clean-up has begun and a description of the methods being used to clean up the spill;
- l. the names of the people observing the spill (with their affiliations) and the extent of injuries, if any;
- m. the Field "Report of Spill" form.

The Company shall ensure that the Contractor's spill report is complete and shall forward it to the Field Environmental Coordinator. The Contractor shall follow the "*Contractor's Environmental Guidelines - Waste Disposal and Spill Notification*" procedures regarding all required regulatory notifications, subject to Company's prior approval, and for obtaining any necessary state and local licenses, permits, or other authorizations associated with the project, except as otherwise provided in the scope of work. Contractor is responsible for knowing what state and local environmental authorizations are necessary for the specific job at hand. Any above-mentioned permits, clearances or authorizations obtained by Contractor shall be furnished to Company.

The following releases require immediate (within 1 hour of discovery) notification to the National Response Center ("NRC"):

- (1) Any petroleum product released into streams, rivers, lakes, or dry washes;
 - (2) A release that exceeds the reportable quantity ("RQ") of any CERCLA hazardous substances in any 24-hour period which is not fully contained;
 - (3) A release of a hazardous substance or hazardous waste which occurs during transportation; and,
 - (4) A release of hazardous waste which contains a RQ of a hazardous substance.
- The National Response Center (1-800-424-8802) will be notified immediately if spills occur above threshold levels (Clean Water Act, 40 CFR 110.10) into surface waters and/or

wetlands.

3. SUGGESTED EQUIPMENT LIST

Section 1.3 of this plan states that the Contractor will prepare a list of the type, quantity, and location of storage or containment and clean up equipment to be used on the construction site. The list will include the procedures and impact minimization measures to be used in response to a spill. The Contractor's choice of impact minimization measures and equipment will be tailored to meet the characteristics of the affected terrain as well as the types and amounts of material that could potentially be spilled. The types of equipment that the Company expects to use to control spills at terrestrial sites and wetlands are described in the FERC's Erosion and Sediment Control Plan.

3.1 TERRESTRIAL CONSTRUCTION

General equipment that the Contractor will use for spill containment and cleanup on terrestrial areas includes:

- sorbents (pillows, socks, and wipe sheets) for containment and pick up of spilled liquids;
- commercially available spill kits (or the functional equivalent thereof) that are prepackaged, self-contained spill kits containing a variety of sorbents for small to large spills;
- structures such as gutters, culverts, and dikes for immediate spill containment;
- shovels, backhoes, etc., for excavating contaminated materials;
- sumps and collection systems; and
- drums, barrels, and temporary storage bags to clean up and transport contaminated materials.

3.1.1 Fuels and Lubricating Oil Storage

The Contractor will implement special measures to prevent spills in areas where trucks carrying fuel and where oil barrels are loaded. Containment equipment will be kept close to tanks and barrels to minimize spill response time, and will include absorbent pads or mats. The quantity and capabilities of the mats will be sufficient to capture the largest foreseeable spill, given ROW or workspace characteristics and crankcase and other fuel vessel capacities.

3.1.2 Routine Refueling and Maintenance

Absorbent pads and mats will be placed on the ground beneath equipment before refueling and maintenance. Equipment that will be stored on site for routine refueling and maintenance includes small sorbent kits (or their functional equivalent).

3.1.3 Equipment Failure

Kits with the capacity of absorbing up to five gallons of liquid can fit beneath the operator's seat on construction equipment for use in an equipment failure.

3.2 WATERBODY AND WETLAND CROSSINGS

For each wetland and waterbody crossed, the equipment listed below will be available in addition to that needed for terrestrial construction. This equipment will be stored close to the water or wetland to minimize response time, and will include:

- oil containment booms and the related equipment needed for rapid deployment, and
- equipment to remove oils from water, such as oleophilic and hydrophobic absorbent booms and mats, and/or mechanical skimmers.