

**PREPAREDNESS, PREVENTION, AND
CONTINGENCY PLAN (PPC)**

**BRINE WATER LINE AND DISPOSAL
WELL FACILITY
(Columbus Township, Warren County)**

Bear Lake Properties, LLC
3000 Village Run Rd. Unit 103, #223
Wexford, PA 15090

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6.9 Medical and Fire Emergency Plans..... 18
7.0 **Emergency Spill Control Network**..... 19
7.1 Arrangements with Local Emergency Response Agencies and Hospitals..... 19
7.2 Notification Lists..... 20

APPENDICIES

Materials List..... Appendix A
Incident Report Form and Incident Records..... Appendix B
Facilities Inspection Checklist..... Appendix C
Spill Prevention Control and Countermeasure Plan..... Appendix D
USGS Location Map and Site Drawings..... Appendix E

2.0 Plan Review Record

The following table is a record of the periodic revisions made to this plan since the original date of plan implementation. It is required by the PADEP that the plan be reviewed annually. This plan will also be reviewed and revised if any of the following occur:

- An applicable regulation is revised;
- The plan fails in an emergency;
- There is a change in the design, construction, operation, or maintenance that materially affects the operation's potential for discharge;
- The list of emergency coordinators changes;
- The list of response equipment changes; or
- As otherwise directed by an applicable agency.

DATE	REVISIONS	SIGNATURE	COMMENTS

The samples were collected and tested by a state certified water-testing laboratory in order to assure an independent objective assessment. These test results are maintained in the file for future reference if they are required for comparison of subsequent test samples. Best Management Practices (BMPs) will be in place to prevent the contamination of any water supply either downstream surface water supply or water well.

3.3 Materials and Waste Inventory

3.3.1 Liquid Storage Description

- 5 gallon pails
- 55 gallon drums
- 210 bbl tank
- 500 bbl tank

4.0 Description of How Plan is Implemented by Organization

4.1 Organizational Structure of Facility for Implementation

The primary emergency coordinator's duties and responsibilities will be as follows:

1. Risk management and inventory of materials,
2. Establishment of all spill reporting duties,
3. Implementation of visual inspection procedures,
4. Review of past incidents and actions taken,
5. Implementation of plan goals,
6. Coordinate all spill clean-up activities,
7. Notifications of all necessary authorities,
8. Education and training of all on-site personnel,
9. Evaluation of plan and change as needed,
10. Review any changes relative to the current plan,
11. Evaluate overall effectiveness of plan, and
12. Review and update the plan on a regular basis and make changes as necessary.

Changes that are made to plan which affect personnel will be communicated at the earliest available time, generally during safety meetings and put into practice as part of standard operating procedures, where necessary. Where mentoring or extended training is required for the individuals to gain experience, a mentoring system will be put in place and On-The-Job training will be documented.

4.2 List of Emergency Coordinators

The following table shows a list of Emergency Coordinators for Bear Lake Properties, LLC; Columbus Township, Warren County Injection Wells Facility.

All calls to report an emergency or contact one of the Emergency Coordinators should be to:

(814) 449-3148

- National Response Center (800-424-8802); and the
- Pennsylvania Emergency Management Agency (717-651-2001); and report the following:
 - Name of person reporting incident,
 - Name and location of the facility,
 - Phone number where the person reporting the spill can be reached,
 - Date, time, and location of the incident,
 - A brief description of the incident, nature of the materials involved, extent of injuries, and potential effects on health or the environment.
 - Estimated quantities of the material involved, and
 - The extent of contamination of land, water, or air, if known.

During an emergency the Emergency Coordinator must take all reasonable measures necessary to ensure that fire, explosion, emission, or discharge do not occur, re-occur, or spread to other materials or wastes at the site. These measures shall include, where applicable, stopping operations, collecting, and containing released materials or wastes, and removing or isolating containers.

If the facility ceases operations in response to a fire, explosion, emission, or discharge, the Emergency Coordinator must ensure that adequate monitoring is conducted for leaks, pressure buildup, or ruptures in valves, pipes, or other equipment, wherever it is appropriate.

4.3.1 Duties after an Emergency

Immediately after an emergency, the Emergency Coordinator, with Pennsylvania Environmental Protection (PADEP) approval, must provide for treating, storing, or disposing of residues, contaminated soil, etc., from and emission, discharge, fire, or explosion at the site.

The Emergency Coordinator must ensure that in the affected areas of the site, no material or waste incompatible with the emitted or discharged residues is processed, stored, treated, or disposed of until cleanup procedures are completed; and all emergency equipment listed in the plan is cleaned and fit for its intended use before operations are resumed.

5.0 Spill or Leak Prevention and Response

5.1 Pre-Release Planning

The sources for potential spills/leaks for this site are from above ground storage tanks, drums and intermediate storage containers, and piping which are summarized in Section 5.2

The property where this site resides is situated on a gentle slope. Pre-planning addresses the potentials hazards and ensures that measures will be taken to minimize exposures which may occur. Therefore spills will be contained within secondary containment areas as a result of measures implemented during pre-release planning.

5.2 Pollution Incident Prevention Practices

5.2.1 Fail Safe Engineering

There are many safeguards that are followed in all of our operations to prevent the accidental discharge of material. All of the storage tanks are equipped with sight glass tubes to gauge the volume in the tank at any given time. Secondary containment will be constructed and utilized to ensure that any spills are contained. Refer to Section 5.2.3 of this PPC Plan for details of secondary containment.

5.2.2 Preventative Maintenance

Preventative maintenance involves the regular inspection and testing of the equipment and operation systems. A preventative maintenance program emphasizes the upkeep and maintenance of systems, which could, upon breakdown or failure, result in conditions that could cause environmental degradation or endangerment of public health and safety. If any deficiencies and/or leaks are discovered during the following preventative maintenance activities, the deficiencies are promptly corrected and any spilled material is immediately cleaned up. The Facility Inspection Checklist is included in Appendix C.

- **Visual Observations** – during transferring and pumping activities visual inspections will be conducted throughout.
- **Detailed Inspections and Monitoring** – See Section 5.4, Inspection and Monitoring Program for a list of detailed inspections.

5.2.3 Discharge and Drainage Control

- **Secondary Containment** –

5.4 Inspection and Monitoring Program

Inspections are made to check for leaks and potential hazardous areas and are documented on the checklist provided in Appendix C of this plan. Specific inspections are performed as follows:

- Observing the exterior of aboveground storage tanks (ASTs), and other equipment for signs of deterioration, leaks, corrosion, and thinning.
- Checking the inventory of discharge response equipment and restocking as needed.

5.5 Brittle Fracture Evaluations and Preventative Maintenance

There are no field-constructed tanks that will be utilized on site.

Inspections will be conducted for the following, which could result in contamination of the work area or environment:

- Leaks in containment systems, tanks and piping.
- Proper function of transfer pumps and isolation valves
- Condition of material handling equipment.

Preventative maintenance will be performed on any areas found to be deficient as part of these inspections. This corrective action will be accomplished and documented. This documentation and original inspection report will be retained in accordance with the requirements of this plan.

- Notify the National Response Center (1-800-424-8802) to report the release if the released material is capable of reaching navigable waters. A listing of the Emergency Response telephone numbers are provided in Section 7.1 and 7.2.
- Assess the area to ensure that human health and environmental hazards have been mitigated.
- Complete an incident report and update the PPC Plan and the Spill Prevention Control and Countermeasure (SPCC) Plan. Refer to Appendix B for a copy of the Incident Report Form.

Petroleum-Based Release or Hazardous Material Response Procedures: Major Release

It should be noted that there is not expected to be storage of any oil or petroleum based fluid in this operation, however, a major release is defined as a release of **25 gallons or more** of oil product and/or over the reportable quantity of a material to the environment or a release which **immediately threatens groundwater or surface water**. In the event of a major release where the material cannot be controlled, contained or mitigated by facility personnel, the following procedure will be implemented:

- If imminent danger exists, immediately notify everyone at the facility. Engage appropriate evacuation procedures, as necessary.
- Upon discovering a spill, the employee must immediately notify the Emergency Response Coordinator.
- The Emergency Response Coordinator will determine if the spill cleanup is within the capabilities and the Bear Lake Properties, LLC personnel to contain.
- The Emergency Coordinator may initiate the following activities, if deemed appropriate:
 - Shutdown all facility operations; and
 - Invoke evacuation of the site.
- If the determination is made that Bear Lake Properties, LLC personnel can respond to the spill safely, then booms, spill stoppers, and adsorbent materials will be deployed to contain the spill and prevent the released material from entering the nearest down-gradient drainage.

During a spill or release, cellular telephones, 2-way radios, voice, and/or hand signals are utilized to provide immediate instruction to facility personnel. Telephones are utilized to communicate with emergency contractors and emergency response agencies in the event of a spill or release.

6.4 Evacuation Plan for Facility Personnel

In the event of a spill or release beyond a minor incident, all visitors and personnel not essential to the control and cleanup operations will evacuate the area. These individuals will exit the facility through the nearest available exit and proceed to the assembly point identified by the Emergency Coordinator (if possible upwind and uphill from the incident). Employees can exit the facility by means of one (1) access road and travel in either direction along public roads to a place of safety. Signals used to begin evacuation will be voice or radio. At the assembly point, the Emergency Coordinator or their designee will be responsible for a head count to ensure that all personnel have been accounted for.

6.5 Emergency Equipment Available for Response

Emergency equipment is maintained in proper working order, clearly labeled, and stored in strategic locations. Emergency equipment includes, portable fire extinguishers (periodically tested), spill control equipment, and first aid supplies. Additional spill equipment is maintained at the site and includes the following materials.

- ECS&R-Environmental Bags
- Personal Protective Equipment-Nitrile gloves, Poly Tyvek, Overboots, Safety Glasses, Goggles, Ear Plugs, and Hard Hats
- Oil Absorbent pads, 4" oil absorbent booms, 8" oil absorbent booms, and oil granular absorbent.
- Heavy Duty Trash Bags, 100' Roll of Poly Plastic
- Hand Rags & Hand Cleaner
- Two Types of Flashlights and a 1200 watt Work Lights w/tripods
- Spade Shovels, Scoop Shovels, Bow Rakes, and Leaf Rakes
- 3000 Watt Portable Generator

If additional equipment is needed, an Emergency Response Contractor listed in Section 7.1 will be contacted to assist in containment and cleanup efforts. After an emergency, all

The following information will be provided to the agencies within 60 days of a reportable spill:

- Name of the facility,
- Name(s) of the facility owner/operator,
- Location of the facility,
- Date and year of initial facility operation,
- Maximum oil storage or handling capacity and daily throughput,
- Description of the facility, including maps and diagrams,
- Complete copy of the PPC and/or SPCC and amendments
- Cause of the spill, including failure analysis, and
- Corrective actions and/or countermeasures taken.

6.7.2 State Reporting

An Incident Report Form that will supply required information for federal, state, and local authorities is included in Appendix B.

Within fifteen (15) days of a reportable incident, the facility will submit a written report to the PADEP. A reportable incident includes the following:

- The facility discharges any quantity of oil or regulated substance that immediately threatens groundwater or surface water.
- The facility discharges at least 25 gallons of oil or regulated substance onto an aboveground surface.
- A release of hazardous substance to the aboveground surface that exceeds its reportable quantity under the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA) of 1980 and 40 CFR Part 302 (relating to designation, reportable quantities, and notification).
- A release of brine with a Total Dissolved Solids (TDS) concentration less than 10,000 mg/L of 15 gallons or more.
- A release of brine with a Total Dissolved Solids (TDS) concentration greater than 10,000 mg/L of 5 gallons or more.

7.0 Emergency Spill Control Network

7.1 Arrangements with Local Emergency Response Agencies and Hospitals

In the event of an accident, spill, or releasing requiring outside assistance, the following emergency response contractors, agencies, and hospitals are available to assist the facility.

MEDICAL AGENCIES	TELEPHONE NUMBER
Corry Memorial Hospital	(814) 664-4641
WCA Hospital (Jamestown, NY)	(716) 487-0141
Hamot Medical Center (Erie, PA)	(814) 877-6000
Millcreek Community Hospital	(814) 864-4031

AMBULANCE SERVICES	TELEPHONE NUMBER
All Emergencies	911
Satellite Emergency Number	(814) 870-1000
Corry Ambulance Service	(814) 664-8656

EMERGENCY CONTACTS	TELEPHONE NUMBER
All Emergencies	911
Satellite Emergency Number	(814) 870-1000
Bear Lake Vol. Fire Company	(814) 664-4811
Columbus Twp. Fire Department	(814) 663-2401
Corry Fire Department	(814) 664-8656