ATTACHMENT 18

PREPAREDNESS, PREVENTION, CONTINGENCY AND EMERGENCY ACTION PLAN



Preparedness, Prevention, And Contingency Plan / Emergency Action Plan

National Fuel Gas Supply Corporation Tioga Pathway Project

Liberty Township – McKean County
Allegany and Harrison Townships – Potter County
Brookfield, Chatham, Deerfield, Middlebury, and Westfield Townships – Tioga County

October 2024

Prepared For:

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Section 1 - General Information

1.1 Objective

Tetra Tech, Inc. (Tetra Tech) has prepared this Preparedness, Prevention, and Contingency Plan / Emergency Action Plan (PPC/EAP) at the direction of National Fuel Gas Supply Corporation (National Fuel) for the Tioga Pathway Project (Project) proposed for construction in Potter and Tioga counties, Pennsylvania.

National Fuel is proposing to construct and operate the proposed Tioga Pathway Project and to abandon certain pipeline facilities. The Project is located in Potter and Tioga counties and consists of the construction and operation of the following facilities described in more detail as follows:

- <u>Z20 Replacement Pipeline:</u> Replace approximately 3.84 miles of 12-inch-diameter 1936-vintage bare steel pipeline with new 20-inch-diameter coated steel pipeline in National Fuel's existing right-of-way (ROW) in Potter County;
- <u>YM58 Mainline Pipeline</u>: Install approximately 19.48 miles of new 20-inch-diameter coated steel pipeline beginning at the east end of the 3.84-mile Z20 Pipeline replacement, traversing Potter and Tioga counties, and ending at the NFG Midstream Covington, LLC Lee Hill Interconnect;
- Auxiliary Facilities:
 - McCutcheon Hill OPP Station: Construct a new over-pressure protection (OPP) station at the interconnection between the eastern terminus of the Z20 Replacement Pipeline and the western terminus of the YM59 Mainline Pipeline in Potter County;
 - Measurement equipment at Midstream's Lee Hill Interconnect: Install gas measurement, gas quality, flow control, OPP devices, a pig launcher, and associated appurtenances (Measurement Facilities) at Midstream's Lee Hill Interconnect to connect the proposed YM59 Mainline Pipeline to Midstream's facilities at the east end of the Project in Chatham Township, Tioga County;
 - Perform minor modifications at National Fuel's existing Ellisburg Compressor Station (CS) including replacing/installing measurement, OPP devices, flow control, and other associated appurtenances in Potter County;
 - Construct one new remote-control valve (RCV) setting at a location along the YM59 Pipeline in Tioga County;
 - Perform modifications to an existing valve setting on the Z20 Replacement Pipeline in Potter County; and
 - o Install a new cathodic protection ground bed at a location along the YM59 Pipeline in Tioga County.¹

To support construction activities, National Fuel estimates that approximately 3.96 miles of temporary access roads (TARs) and 1.76 miles of permanent access roads (PARs) will be used to support construction and operation of the Project. In addition, three (3) previously used staging areas (Port Allegany Pipe Yard, Harrison Valley Contractor Yard [HV Contractor Yard], and Middlebury Contractor Yard) will be used to store materials and equipment.

This PPC/EAP has been prepared in accordance with Commonwealth of Pennsylvania Department of Environmental Protection (PADEP) Division of Oil and Gas, *Oil and Gas Management Practices and Guidelines for the Development and Implementation of Environmental Emergency Response Plans. I.D.:400-2200-001*. This plan provides information and procedures in accordance with state and federal

¹ Two cathodic protection ground bed locations are being considered as potential siting alternatives, but the Project will only require construction of one ground bed.

regulations regarding means to prevent and minimize hazards to human health or the environment from fires, explosions, or any unplanned sudden or non-sudden releases of toxic, hazardous or other polluting materials to air, water, or land.

For purposes of this plan the following definitions apply:

- A spill is defined as any unauthorized spill or leak of a hazardous material or oil.
- A significant spill is defined in the Oil and Gas Management Practices and Guidelines for the Development and Implementation of Environmental Emergency Response Plans as including but not limited to releases of oil and hazardous substances in excess of reportable quantities under Section 3111 of the Clean Water Act (40 CFR §110.10 and CFR §117.21) or Section 102 of the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA; 40 CFR §302.4).
- *Hazardous material* is defined as any substance or material that could adversely affect the health or safety of the public or environment.
- A hazardous waste is generally defined as dangerous waste that poses a substantial present or
 potential hazard to human health or the environment. 40 CFR §261.3 provides in-depth
 definitions of hazardous waste.
- An emergency is defined as a significant injury requiring medical treatment beyond the scope of on-site personnel training.

NOTE: SITES WHERE STORAGE OF OVER 1,320 GALLONS OF OIL WILL OCCUR MUST DEVELOP A SITE SPECIFIC SPCC PLAN. SEE ENVIRONMENTAL COORDINATOR FOR SITES WHERE STORAGE OF GREATER THAN 1,320 GALLONS OF OIL IS ANTICIPATED.

EMERGENCY CONTACT INFORMATION IS PROVIDED IN ATTACHMENT 1 OF THIS PLAN. FOLLOW PROPER NOTIFICATION PROTOCOL IN THE EVENT OF ANY SPILL OR EMERGENCY ON-SITE.

1.2 Site Information

Site Name: Tioga Pathway Project (Refer to **Figure 1** for project location map)

Site Address and Directions to Site: (project start) 1005 Marsh Creek Rd, Mills, PA 16937 From Westfield, PA: take PA-49 W 9.6 miles to Marsh Creek Rd – take Marsh Creek Rd NW 2.2 miles to 1005 Marsh Creek Rd – destination will be on the right.

1.3 Plan Availability

A copy of this plan shall be available in the following locations:

- On-site in the project mailbox, job trailer, or with the on-site coordinator
- Office of the Environmental Coordinator

1.4 Plan Revisions

The PPC/EAP and all site operations shall be reviewed at least once per year to assure that the plan is consistent with applicable state and federal regulations. The plan will also be revised if:

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- changes in site operations occur that materially increase the potential for fires, explosions or releases of toxic or hazardous constituents or change the response necessary in an emergency;
- routine inspections determine that the plan needs to be revised;
- the plan fails to achieve the objective stated in **Section 1.1**;
- applicable PADEP or federal regulations are revised;
- the list of personnel who are responsible for implementing or maintaining this plan or emergency equipment changes; or
- as required by the PADEP.

When plan changes are required, the plan will be revised within 30 days of identifying the need for a revision. Plan changes will be implemented in a timely manner, but in no case later than 90 days. Notification of plan changes or additions will be made to personnel or groups listed in **Attachment 1**. The on-site copy of this plan will have appropriate changes made with dating and initialing labeled on this copy of the plan.

1.5 Plan Implementation and Organization

In the event of an emergency situation which endangers public health and safety or the environment, the provisions of this plan will be immediately implemented. The following sections shall be referenced for additional information on plan implementation and organization for the project:

- Section 2.0 Plan team members and associated responsibilities
- **Section 3.0** Pertinent site-specific information
- **Section 4.0** Preventative measures
- **Section 5.0** Countermeasures
- **Section 6.0** Incident notification information

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Section 2 - Plan Team and Responsibilities

2.1 PPC/EAP Team

The PPC/EAP Team consists of the following persons and chain of command (in order of priority):

Name/Title		Telephone	
Chris Davis National Fuel Gas Supply Corporation	Office:	814-871-8998	
Construction Manager	Cell:	724-825-9229	
Lauren McMillan National Fuel Gas Supply Corporation Environmental Coordinator	Office:	814-871-8195 814-706-4781	
Nate Duffy National Fuel Gas Supply Corporation Land Coordinator	Office:	585-738-4667	

Responsibilities of the PPC Plan Team include:

- Maintain familiarity with the contents of this plan.
- Provide training so that on-site personnel are familiar with the contents of this plan.
- Perform spill prevention measures specified in **Section 4.0**.
- Maintain records of spill prevention efforts such as inspections and preventive maintenance as described in **Section 4.0**.
- Implement emergency countermeasures presented in **Section 5.0** under the direction of the emergency coordinator or designee.
- Submit a written report to the appropriate regulatory agency and within the proper timeframe of a significant spill.
- Ensure that all in field National Fuel employees are familiar with the plan, and understand how to react in case of an emergency

All on-site personnel shall be made familiar with the contents of the PPC/EAP through regular training and periodic safety meetings. Proper training will help all on-site personnel to understand proper protocols in the event of an inadvertent spill or emergency.

2.2 Plan Chain of Command

The plan chain of command defines on-site emergency personnel and members of the PPC/EAP Team that shall be contacted in the event of an emergency. Team members shall be familiar with the order of priority for emergency notifications (see Attachment 1 Emergency Contact Information)

2.3 Emergency Coordinator

The construction manager is the emergency coordinator is responsible for implementing the plan. Should the emergency coordinator not be available on-site, he/she shall designate a member of the PPC/EAP Team that is familiar with the contents of the plan to act as emergency coordinator in his/her stead.

In the event of an emergency, responsibilities of the emergency coordinator include:

- Activate any alarms and notify personnel as applicable.
- Coordinate all emergency response efforts and establish a safe area command center.
- Take all reasonable measures to ensure that fire, explosion, emission, or discharge do not
 occur, re-occur or spread to other materials or wastes at the installation. These measures
 include stopping work and operations, collecting and containing released materials and
 wastes, and removing or isolating containers.
- Notify appropriate emergency response agencies as specified in **Section 6.0** and listed in **Attachment 1**.
- Notify members of the PPC/EAP Team.
- Identify the character, exact source, amount, and extent of released material.
- Assess possible hazards to human health or the environment (including direct and indirect effects).
- Take all reasonable measures and commit resources needed to carry out the plan.
- Ensure that site operations underway during the emergency response are properly monitored and controlled.
- Ensure that cleanup residues are properly handled and disposed.

Further details concerning countermeasures and emergency contacts are contained within **Section 5.0** and **Section 6.0** of this plan.

2.4 Plan Administrator

The environmental coordinator or designee is responsible for developing and maintaining the PPC/EAP and will be referred to as the plan administrator:

Responsibilities of the plan administrator include:

- Ensure that the plan is reviewed and updated as required.
- Ensure that the plan is distributed as required.

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Section 3 - Site Activity Description and Potential Pollutants

3.1 Site Activity Description

Tetra Tech has prepared this Preparedness, Prevention, and Contingency Plan / Emergency Action Plan (PPC/EAP) at the direction of National Fuel for the Tioga Pathway Project proposed for construction in Potter and Tioga counties, Pennsylvania.

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To support construction activities, National Fuel estimates that approximately 3.96 miles of temporary access roads (TARs) and 1.76 miles of permanent access roads (PARs) will be used to support construction and operation of the Project. In addition, three (3) previously used staging areas (Port Allegany Pipe Yard, Harrison Valley Contractor Yard [HV Contractor Yard], and Middlebury Contractor Yard) will be used to store materials and equipment.

An erosion and sediment (E&S) control plan has been developed for the project to prevent erosion to disturbed soil surfaces and reduce sedimentation to surrounding surface and ground water.

3.2 Material and Waste Inventory

All materials stored on-site shall be properly marked and kept in U.S. Department of Transportation (DOT) approved containers. Safety Data Sheets (SDS) for materials shall be maintained on-site as

² Two cathodic protection ground bed locations are being considered as potential siting alternatives, but the Project will only require construction of one ground bed.

necessary. Overnight equipment parking and re-fueling shall occur at least 100 feet from a waterbody or wetland boundary.

Waste generated on-site will be characterized, properly stored, and disposed of at an approved facility.

Table 3.2 has been included on the following pages to provide an inventory of materials typically expected to be on a construction site of this type, chemicals within these materials that are potential pollutants, and BMPs associated with each material type to mitigate risk for water resources pollution. The emergency coordinator should review **Table 3.2** prior to construction to identify potential pollutants and determine proper BMPs for each material. A drum log is provided in **Attachment 4** and should be utilized when waste is removed from site and must be stored prior to being properly disposed. A chemical storage log is provided in **Attachment 5** and chemicals to be stored and used on site shall be tracked via the storage log.

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Table 3.2. Potential Pollutant Sources and Best Management Practices

Material/Chemical	Potential Pollutants	Best Management Practice
Cleaning Solvents	Perchloroethylene, methylene chloride, trichloroethylene, petroleum distillates	Proper application (see manufacturer recommendations). Disposal of used containers and excess material must follow manufacturer specifications. Storage: Tightly sealed containers indoors, or within a shed or truck toolbox. If product is stored outdoors, must be stored under a shelter or term within secondary containment.
Glue, Adhesives, Epoxy Powders	Polymers, epoxies	tarp within secondary containment. Disposal of used containers must follow manufacturer specifications. Proper application (see manufacturer recommendations). Storage: Properly sealed containers indoors, on a pallet, under shelter, tarp or inside a vehicle tool cabinet.
Concrete, Concrete Washout Water	Limestone, pH	Designated concrete washout area on ROW. Do not clean out hopper or chute on to ground or in drainage channels. Concrete washout area must be within a bermed containment area. It must be cleaned out when it reaches a 75% capacity. Recommend cleanout at 50%. All wash out areas will be in the permanent ROW.
Wood Preservatives	Stoddard solvent, petroleum distillates, arsenic, copper, chromium; creosote; pentachlophenol	Proper application (see manufacturer recommendations). Disposal of used containers and excess material must follow manufacturer specifications. Storage: Tightly sealed containers indoors, or within a shed or truck toolbox. If product is stored outdoors, must be stored under a shelter or tarp within secondary containment.

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Material/Chemical	Potential Pollutants	Best Management Practice
Gasoline / Diesel Fuel	Benzene, ethyl benzene, toluene, xylene, MTBE	Proper application (see manufacturer recommendations). Disposal of used containers and excess material must follow manufacturer specifications. Storage: Tightly sealed containers indoors, or within a shed or truck toolbox. If product is stored outdoors, must be stored under a shelter or tarp within secondary containment. All onsite vehicles will be routinely inspected for leaks and drips.
Kerosene	Coal oil, petroleum distillates	Proper application (see manufacturer recommendations). Disposal of used containers and excess material must follow manufacturer specifications. Storage: Tightly sealed containers indoors, or within a shed or truck toolbox. If product is stored outdoors, must be stored under a shelter or tarp within secondary containment.
Antifreeze/Coolant	Ethylene glycol, propylene glycol, heavy metals (copper, lead, zinc	Proper application (see manufacturer recommendations). Disposal of used containers and excess material must follow manufacturer specifications. Storage: Tightly sealed containers indoors, or within a shed or truck toolbox. If product is stored outdoors, must be stored under a shelter or tarp within secondary containment. All onsite vehicles will be routinely inspected for leaks and drips.
Detergents	Phosphorous	Proper application (see manufacturer recommendations). Disposal of used containers and excess material must follow manufacturer specifications. Storage: Tightly sealed containers indoors, or within a shed or truck toolbox. If product is stored outdoors, must be stored under a shelter or tarp within secondary containment.

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Material/Chemical	Potential Pollutants	Best Management Practice
Sediment	Nutrients, suspended solids, sediment	Sediment erosion and sedimentation on-site should be controlled by structural and non-structural BMPs. Structural BMPs can include but are not limited to: waterbars, erosion control blankets, riprap, and compost filter sock. Non-structural BMPs can include but are not limited to: seed and mulch, exposure time of disturbed soils, education of on-site personnel.
Coal Tar Wrapped Pipeline	PCB/Asbestos	Coal Tar wrapped pipeline will be segregated from other waste and disposed of properly; pending analytical results. Pipeline ends will be individually wrapped and/or placed in a lined, covered roll-off.
Coal Tar Debris	PCB/Asbestos	Loose debris will be collected during the pipe removal process. All debris will be bagged in a sealed drum (secondary containment). Debris will be disposed of properly pending analytical results.
Bare Steel Pipeline (PCB Contaminated)	PCB	PCB contaminated bare steel waste will be disposed of properly; pending analytical results. Pipeline ends will be individually wrapped and/or placed in a lined, covered roll-off.

3.3 Pollution Incident History

No major pollution incidents have occurred on project site.

3.4 Implementation Schedule for Plan Elements not Currently in Place

There are no known elements of this plan that are not currently in place. Certain projects may require additional measures depending on scope of activity. Additional items that may need to be implemented include but are not limited to:

- Erosion and sediment control plan and applicable PADEP permits
- Post-construction stormwater management plan and applicable PADEP permits
- Inadvertent release plan for boring projects
- Additional chemical and material management measures

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Section 4 - Spill Prevention and Response

4.1 Pre-release Planning

The on-site coordinator must assess the materials kept on-site and note areas that may become contaminated should a spill occur. Preventative measures listed below should be considered when storing potentially hazardous chemicals or materials on-site:

- Store chemicals and materials in proper U.S. DOT approved totes/containers
- Provide secondary containment as required
- Store potential pollutants in areas where they will not be readily transported toward sensitive water resources in the event of a spill
- Note any emergency shutoff valves on equipment or storage containers that will be used in the event of a spill

4.2 Material Compatibility

Materials must be stored in dedicated containers or totes and used only for the intended chemical storage. Storage containers should not be reused with a different chemical if there is any chance of a reaction occurring. If the reactivity between chemicals is unknown, they should not be mixed or stored in the same container until it has been verified that no harmful reaction will take place.

Thorough cleansing of chemical storage containers should be standard practice to ensure that there is no residual incompatible with the next or later materials used. Any available National Fire Protection Agency (NFPA) placards should be referenced for hazardous materials to identify potential reactivity.

4.3 Inspection and Monitoring Program

During construction, employees are required to check for the following conditions: spills and leakage of fuels, lubricants or any other contaminants; visible soil contamination; malfunctioning equipment; on-site traffic accidents; storm water contamination; or any other condition which could lead to contamination of air, soil, or water. If an abnormality occurs, the employees must contact one of the designated PPC/EAP Team members listed above in **Section 2.1** of this plan

Inspections shall occur on a daily and weekly basis as described below:

<u>Daily Inspections</u>: A National Fuel employee, or designee, will conduct a visual inspection of the project area each day. The purpose of the inspection is to identify housekeeping and preventative maintenance needs. Issues of potential concern will be brought to the attention of the responsible person in charge immediately following the inspection. A log of any issues identified during daily inspections shall be kept on-site with the copy of the PPC/EAP and E&S Control Plan.

<u>Weekly Inspections</u>: A National Fuel employee, or designee, shall conduct a weekly inspection of the site and log findings on the standard PADEP Inspection Form 3150-FM-BWEW0083 to record their findings. A copy of the PADEP Standard Inspection Form is included in **Attachment 2**. The standard form should be used for E&S BMP inspection, and any spills or potential pollution issues should be noted on Item 8 of the inspection form.

4.4 Preventative Maintenance

Preventative maintenance measures for the expected scope of work are listed below:

• Construction Activities

O During construction, proper BMPs shall be utilized to prevent stormwater runoff coming into contact with potential pollutants including construction materials, fuel, and construction equipment. Equipment and material storage areas should be located in areas where the potential for contact with water resources is at a minimum. Furthermore, risk for pollution from erosion and sedimentation will be mitigated through the use of PADEP approved erosion and sediment control BMPs.

• Materials Handling

- Materials to be stored in the project area should be located in areas that are protected from significant surface flows to prevent transmission of potential pollutants to surface waters
- O Hazardous materials, including chemicals, fuels, and lubricating oils, shall not be stored within 100 feet of a wetland, waterbody, or designated municipal watershed area, unless the location is designated for such use by an appropriate governmental authority. This applies to storage of these materials and does not apply to normal operation or use of equipment in these areas.
- O Any potential pollutants stored on-site shall be kept covered with proper secondary containment to prevent water resources impacts.
- O Any collected stormwater within secondary containment shall be inspected for signs of pollution (sheen, discoloration and other signs of chemical pollution). If no evidence of pollution is noted, collected water will be allowed to evaporate. Where possible pollution is discovered within secondary containment, collected stormwater should be properly disposed of offsite by hauling to a PADEP approved facility.

• Equipment Cleaning and Maintenance

Cleaning and maintenance of equipment should take place away from water resources and within designated areas of adequate containment to prevent pollutants from entering water resources. Overnight equipment parking and refueling shall occur at least 100 feet from a waterbody or wetland boundary.

• Pipelines Carrying Contaminants

• Testing will be conducted prior to the transport of natural gas to ensure pipeline integrity.

• <u>Sumps/Tanks Carrying Contaminants</u>

O Sumps and tanks containing potential pollutants shall be located away from existing water resources and secondary containment should be provided.

• Coal and Acid Producing Rock

Construction personnel shall be aware of areas where there is potential to encounter coal and/or acid producing rock (APR) and countermeasures that must be undertaken if APR is found during excavation. Personnel shall be aware that although high potential areas have been identified, any APR encountered shall be handled according to the countermeasures measured in Section 5.2 of this plan. If subsurface conditions

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are encountered with the potential for release of water from a historic mine void, the countermeasures outlined in *Section 5.2 & 5.3* shall be utilized to contain and properly dispose of potential pollutants.

4.5 Housekeeping Program

General Site Housekeeping:

Site housekeeping practices shall be implemented to provide neat storage of materials on-site in order to reduce the potential for materials to be exposed to stormwater runoff and to ensure that debris is not left at the site upon project completion.

Workspaces shall be inspected at the end of each workday and any trash, debris, or other discarded materials should be properly disposed of in designated roll-off bins or similar container. The site should also be inspected for accumulated soils at BMPs and also at site entrance/exits. Any collected soils should be placed at a designated area on-site and stabilized with seed and mulch upon reaching final grade. Soils deposited on roadways shall be swept using hand tools or a street sweeping machine (if permissible) and soils shall be returned to the project area. No soils should be swept into roadside ditches or storm inlets.

An inspection schedule for general housekeeping should be defined at the beginning of the project and employees should be informed of proper practices and pollution prevention concepts.

Fuel and Chemical Handling

Potentially hazardous materials such as fuel and oil for equipment and chemicals associated with the project should be properly stored on-site and secondary containment should be provided at storage locations to prevent release of harmful fluids to the environment.

Drip pans or similar methods should be provided during equipment fueling to contain leaks. Any waste occurring during refueling or maintenance should be stored in proper containers and taken off site for disposal or recycling. Overnight equipment parking and refueling shall occur at least 100 feet from a waterbody or wetland boundary. Any major maintenance projects on equipment should be carried out at an offsite location.

Should a spill occur, contaminated soils shall be excavated and stored in lined containers for disposal. Proper reporting and record keeping procedures consistent with the applicable agency standards shall be utilized in the event of a spill. Vehicles and other equipment should be inspected regularly for leaks and required maintenance should be completed immediately. The following guidelines should be observed for fuel and chemical storage on-site:

- 1. Product containers should be clearly labeled, inventoried, and Safety Data Sheets (SDS) shall be kept on site.
- 2. Store fuel and chemicals away from construction traffic to reduce potential for accidental spills.
- 3. Any fuel or chemical storage tanks/drums should be kept within secondary containment.
- 4. Monitor storage areas regularly for leaks and check secondary containment for evidence of leaks (sheen, discoloration, etc.)

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4.6 Security

While site security is not a major concern given the scope of the project, procedures should be followed at the site to prevent accidental or intentional entry that could result in a violation of Departmental regulations, or injury to persons or livestock. The following procedures should be considered in relation to site security:

- Locate equipment and materials away from any area where the public can easily gain access.
- Provide fencing as necessary or store equipment and materials inside of locked, fenced areas where possible.
- Provide locks on storage tank drain valves, fuel dispensers, etc.
- Install safety fence to deter foot traffic in active work areas.
- Provide traffic control as necessary to deter unauthorized public travel in work areas.
- Provide proper flagging and signage when needed for entering and exiting public roadways.

4.7 External Factor Planning

Severe weather events are the main external factor considered to cause a potential issue for the proposed project. In the event of extremely severe weather including but not limited to thunderstorms, tornadoes, hail, and/or severe snowstorms; construction activity shall cease, and on-site personnel shall take proper cover until the weather event has ceased. Personnel shall monitor the weather to provide early warning of incoming severe weather.

For any precipitation event, severe or minor, there is an increased risk of pollution from accelerated erosion and sedimentation, as well as the potential for increased pollutant transport should a spill occur during a precipitation event. Proper inspection of E&S BMPs and material or chemical storage areas prior to and within 24 hours following a rain event will mitigate risks associated with stormwater runoff contacting disturbed or contaminated soils. Additional external factors may be present and should be noted by the on-site coordinator as they become evident. Employee and public safety shall be considered first priority in the event of any emergency.

4.8 Employee Training Program

The emergency coordinator is responsible for the initiation of all periodic training sessions that will include no less than the following:

- Implementation of the spill prevention and response plan
- Adopting effective "Good Housekeeping" practices
- Preventative maintenance
- Materials management BMPs
- E&S Control/Storm Water Pollution Prevention

Personnel will be trained, at least annually, in good housekeeping techniques and preventive measures to control the release of contaminants, along with other pertinent safety topics. Contractors or temporary personnel will be apprised of site operation and design features that are intended to prevent discharges or spills from occurring. New employees, who will be involved with response to any spill and/or contamination, will be trained in the applicable pollution control response methods. New employees will also be trained on the contents of the applicable PPC/EAP, and a copy will be made available for reference. Records are to be kept by the emergency coordinator.

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Section 5 - Countermeasures

5.1 General

Employees must report immediately to the designated individuals listed in **Section 2.1** if any spill, incident/emergency or potential contamination problem has occurred.

During an emergency, operations will cease. Qualified personnel will direct response efforts with available equipment and personnel until emergency assistance arrives.

5.2 Countermeasures for Coal and Acid Producing Rock

Construction personnel shall be familiar with those areas of interest identified as either highly sensitive activities or activities occurring where there is potential to encounter coal and/or APR.

In the event coal or APR is encountered during construction and material is to be moved off-site, National Fuel shall:

- 1. Notify the PADEP Water Quality Specialist assigned to the project;
- 2. Within the cut (trench) area:
 - a. Segregate the APR material to be disposed of,
 - b. Keep the APR material elevated from bare ground, away from surface runoff and covered at all times,
 - c. Seal the trench in accordance with the standard details shown on the E&S Control Plans.
- 3. Properly dispose of APR material at an approved facility.

In the event coal or APR is encountered during construction and material is to be handled on-site, National Fuel shall:

- 1. Notify the PADEP Water Quality Specialist assigned to the project;
- 2. Within the cut (trench) area:
 - a. APR shall be sampled for percent sulfur (%S) in accordance with the PADEP Guidance Document "How to Avoid and Handle Acid-Producing Rock Formations During Well Site Development,"
 - b. If coal or APR averages more than 0.5 %S, it must be segregated and mixed with a sufficient amount of neutralizing materials (limestone, quick lime, or hydrated lime) in accordance with the rate specified in the PADEP guidance,
 - c. Neutralized APR shall be encapsulated with a layer of low permeability clay above and below the APR to reduce contact with water and oxygen.

In the event coal or APR is encountered during construction and water is emanating from the seam during construction, National Fuel shall:

- 1. Notify the PADEP Water Quality Specialist assigned to the project;
- 2. Within the cut (trench) area, test accumulated water with a field pH meter
 - a. If the pH test result is neutral (pH value between 6.0 and 9.0), follow standard dewater, procedures per PADEP Standard Construction Detail #3-16;
 - b. If the pH test result is basic (pH value above 9.0) or acidic (pH value below 6.0), collect the water and transfer to an approved treatment or disposal facility.

3. Once the water is contained, perform the process above to remove any coal or APR and seal the trench in accordance with the standard details.

5.3 Countermeasures for Mine Void Encounter

While it is assumed that encounter of a mine void is unlikely, unless otherwise directed by National Fuel, the following countermeasures are provided in the unlikely event that a mine void is encountered during pipeline construction.

In the unlikely event that a mine void is encountered within trench or during boring the contractor should:

- 1. Stop work in the vicinity of the mine void;
- 2. Notify the construction supervisor, environmental inspector and PADEP Water Quality Specialist assigned to the project;
- 3. Contact DEP Bureau of Abandoned Mine Reclamation Wilkes-Barre Office at (570) 826-2441 and provide the following information;
 - a. Description of the problem,
 - b. Geographic location of the problem, including municipality, county and site coordinate,
 - c. Driving directions to the problem site,
 - d. Contact information for the contractor and National Fuel personnel familiar with the problem.
- 4. Wait for a determination from the PADEP before proceeding with any additional work activity in the vicinity of the mine void.

The likely remedial action to stabilize the areas and continue pipeline construction would be:

- 1. Continually monitor the area for a hazardous atmosphere. If a hazardous condition is discovered, personnel shall vacate the work area and follow emergency action procedures outlined in this plan;
- 2. If a mine void is encountered, construction shall be halted, and a geotechnical investigation shall be conducted to determine the extent of the void and whether the pipeline can be installed within solid geology;
- 3. The pipeline shall not be installed within an open mine void, if this situation arises an alternate crossing location shall be identified;
- 4. Should it be determined that the pipeline can be installed in solid geology, the void shall be filled and sealed upon completion;
- 5. For a trench with a void to be sealed;
 - a. Fill the void with AASHTO #1 crushed limestone up to bottom of trench;
 - b. Cover and seal the top of the crushed limestone and adjacent portions of the pipeline trench with a mudmat of sulfate resistance concrete:
 - c. Seal trench in accordance with the standard details.

5.4 Countermeasures to be Undertaken by Facility

During construction a supply of spill response materials will be stored on-site. Personnel should be familiar with the following general conditions relative to providing countermeasure support:

• Smoking at the active construction areas will be prohibited.

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- Follow housekeeping program listed in **Section 4.5**
- Refer to **Attachment 1** for local fire department and hospital emergency contact and notification information.
- Tools used for spill cleanup should be cleaned and contaminated water shall be properly disposed. Incidents should be properly documented with all pertinent information and kept on record.

In the event of an accidental spill or release of hazardous materials that may have an adverse impact to people, property, or the environment, the following procedures will be implemented:

- Notify emergency coordinator if a spill has occurred and request instructions for forward proceedings.
- The emergency coordinator will inspect the site to identify the type of materials being released and will assess the probability of environmental damage based on the location of the spill and other factors.
- Upon being notified of a spill or emergency, the chain of command personnel shall notify proper regulatory agencies as necessary.
- Take the action necessary to contain and/or mitigate possible environmental damage.
- Contain the leak and/or spill with absorbent material, diking material, (or soil, if necessary).
- Equipment from the operation will be mobilized to remove contaminated materials and place them in a suitable container for conveyance to a certified disposal site.
- Perform any testing on materials from the clean-up (needed to determine final destination of waste materials) and submit to appropriate regulatory agency.
- Complete an internal spill report for the incident. Contact a waste contractor to arrange for the removal of contaminated absorbent materials. Arrange for testing of wash water to determine how it can be safely disposed.
- When the incident is corrected, the on-site coordinator will report the spill to the Environmental and Safety Coordinator and record this information in the daily operating logs.

Contractors Utilized for Transportation of Wastes and Waste Management Facilities

Lake View Landfill 815 Robison Road Erie, PA (814) 825-8588 [contaminated soil]

CID Landfill 10860 Olean Road Chafee, NY 14030 (716) 496-5000 [fuels, oils, antifreeze]

Greentree Landfill (BFI) 635 Toby Road Kersey, PA 15846 (814) 265-1744 [fuels, oils, antifreeze] Clarion Environmental State Route 36 Leeper, PA 16233 (814) 744-8220 [fuels, oils, antifreeze]

United Environmental Services 241 McAleer Road Sewickley, PA 15143 (412) 367-4427 [spent methanol]

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5.5 Countermeasures to be Undertaken by Contractors

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

Fox Construction North Collins, NY (716) 337-2546 water, brine hauling, dump truck, dozer

Haley Construction North Collins, NY (716) 938-9183

backhoe, dozer, dump truck

Winter's Rigging North Collins, NY heavy equipment moving, crane truck services

(716) 337-3930 Kirila Contractors, Inc.

water, dump truck, dozer

505 Bedford Road Brookfield, OH 44403 (330) 448-4055

Lineal Industries, Inc. 5631 Steubenville Pike Pittsburgh ,PA 15136 (412) 787-0410

backhoe, dozer, dump truck

Belser Hale (814) 368-4467

backhoe, dozer, dump truck

International Waste Niagara Falls, NY (716) 285-9101 waste disposal

5.6 Internal and External Communications

Employees must provide notification by telephone immediately according to the chain of command listed in **Section 2.1** and **Section 2.2** if any spill, incident/emergency or potential contamination problem has occurred. If the first person on the list is not available, the employee shall continue through the chain of command phone list until proper contact has been established.

An employee providing notification of a spill or emergency must continue going through the call list until an actual person has been contacted. Telephone messages may be left as necessary but leaving a message does not fulfill the notification requirements of this plan.

During any shift, the emergency coordinator may be contacted either by cell phone or word of mouth, but verification of the contact must be assured prior to considering the notification requirement met. During weekends and holidays, emergency coordinators should be called on their mobile phones.

In cases of fire or injury, the local fire, Emergency Management Service (EMS), and police departments should be notified before any other actions are taken.

A complete Notification List can be found in **Attachment 1** of this document.

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5.7 Evacuation Plan for Installation Personnel

In the event of a fire or emergency on-site, personnel will rally near an access road or at the nearest site entrance. Once a person has been accounted for, he or she may be directed to evacuate the premises entirely by the emergency coordinator or the highest-ranking person on location according to the chain of command. It is the responsibility of the emergency coordinator to account for all individuals on the site and direct emergency personnel to the last known location of any missing person.

5.8 Emergency Equipment Available for Response

Basic spill cleanup materials shall be stored in the on-site totes or kits. Absorbent booms, socks, pillows, as well as additional equipment are available on location for initial response to emergencies (hand tools, fire extinguishers, and cleaning supplies). In addition to spill response kits, the following items shall be available for response to an emergency:

<u>Fire Extinguisher(s)</u>: Fully-charged fire extinguishers will be readily available on-site.

<u>First Aid Kit(s)</u>: In the case of on-site personnel accidents or injuries, first aid kits shall be available to provide initial response to the injured person. First aid may be administered by qualified individuals on-site if extent of injuries permits. In case of more serious injuries, emergency response personnel will be notified (paramedics for transport to the local hospital). General first aid procedures should be followed until emergency medical assistance arrives.

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Section 6 - Emergency Spill Control Network

6.1 Arrangements with Local Emergency Response Agencies and Hospitals

Attachment 1 lists contact information for the local and regional emergency response network available to support National Fuel in the event of a medical emergency at the site. **Figure 2** shows direction from the project site to the nearest hospital.

University of Pittsburgh Medical Center (UPMC) Cole will provide or assist gaining access to all emergency medical services. This facility does have an emergency medical unit.

6.2 Content of Verbal Notification

Verbal notice of an emergency or spill to regulatory agencies, and designated company individuals should include as much of the information listed below as is known at the time of notification.

- Location and source of the release
- Chemical name or identity of any substance involved in the release and whether the substance is a hazardous substance; i.e., the Chemical Abstract Service ID number (CAS #) as listed in the material's SDS
- Estimate of the quantity of the substance released into the environment
- Time of the release
- Date of the release
- Environmental medium or media into which the substance was released (soil, storm drain, surface waters)
- Duration of the release
- Proper precautions to take as a result of the release, including evacuation and other proposed response action
- Any known, anticipated or chronic health risks associated with the release and, if known to the informant, advice regarding medical attention necessary for individuals exposed to the substance released
- Name and telephone number of the person or persons to be contacted for further information
- Other information as required

Notification shall not be delayed in order to research missing information. As further information on the release or emergency is discovered it should be relayed to the proper designated individual.

6.3 Formal Incident Reporting

To standardize the procedures for National Fuel employees and contractors, and simplify the In-Field decision making process, all spills, leaks, releases or injuries **must be reported immediately** to the National Fuel Environmental and Safety Department. Appropriate reporting, by National Fuel to relevant authorities will be conducted as per applicable regulations. Potential reports that may need files depending on spill character and quantity include but are not limited to:

- United States Environmental Protection Agency (USEPA) Report for Spills
- USEPA Reportable Quantities
- PADEP Spill Report for spills affecting streams
- PA Fish and Boat Commission
- Potter County Department of Emergency Services

Reportable quantities for hazardous substances are set forth in 40 CFR §110 and §117. The reportable quantities for the hundreds of hazardous substances listed range from as little as one (1) pound to as much as 5,000 pounds, depending on the substance. Oil which is released in sufficient quantity to form a film or sheen on, or discoloration of, the surface of the water or the shoreline, or which deposits a sludge beneath the water surface on the shoreline is reportable. "Oil" includes but is not limited to petroleum, fuel oil, sludge, oil refuse, and oil mixed with wastes. A "sheen" is defined as an iridescent appearance on the surface of the water.

The USEPA has defined "significant spills" to include releases within a 24-hour period of hazardous substances in excess of reportable quantities under Section 311 of the Clean Water Act and Section 102 of CERCLA.

The judgment of what is a "significant" spill must be made on a case-by-case basis by the site operator.

Disclaimer: All applicable codes, standards, policies, procedures, and best management practices must be followed whether specifically addressed in this plan or not. These include but are not limited to: the Occupational Safety and Health Administration (specifically 29 CFR §1910.120 and §1910.1200), USEPA/PADEP regulations, National Fuel policies and procedures, 40 CFR, Coast Guard regulations, and local Ordinances.

6-2

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October 2024

Section 7 - References

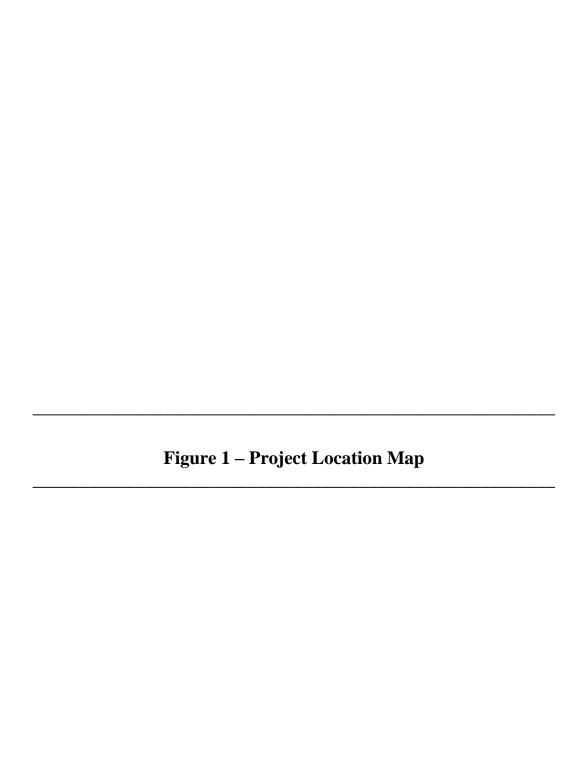
40 CFR §261.3

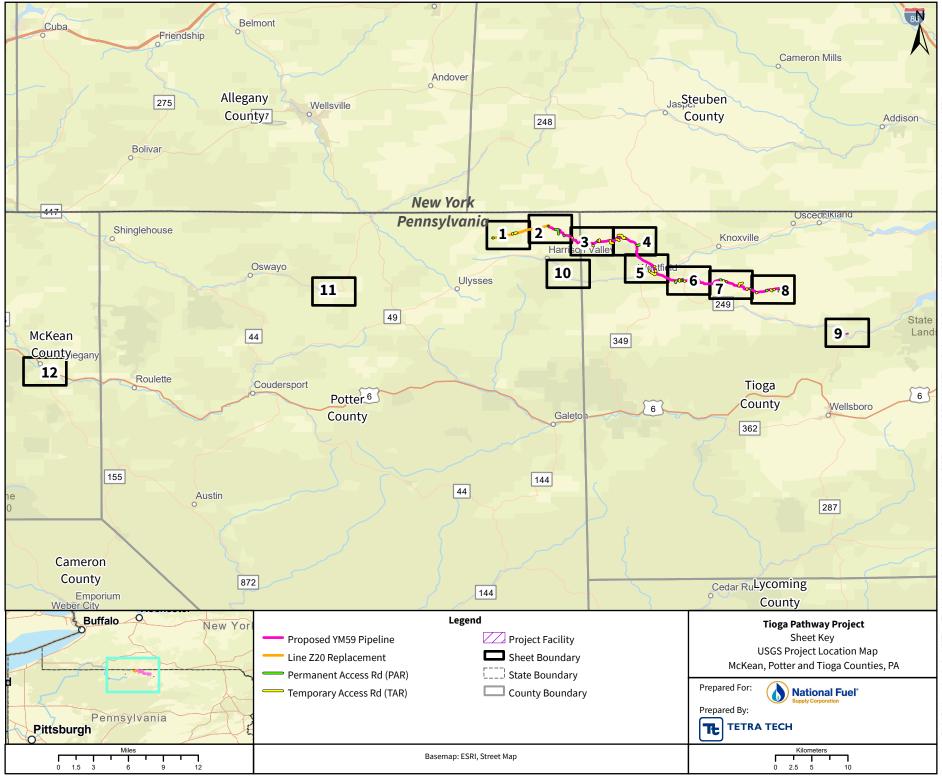
40 CFR §110.10

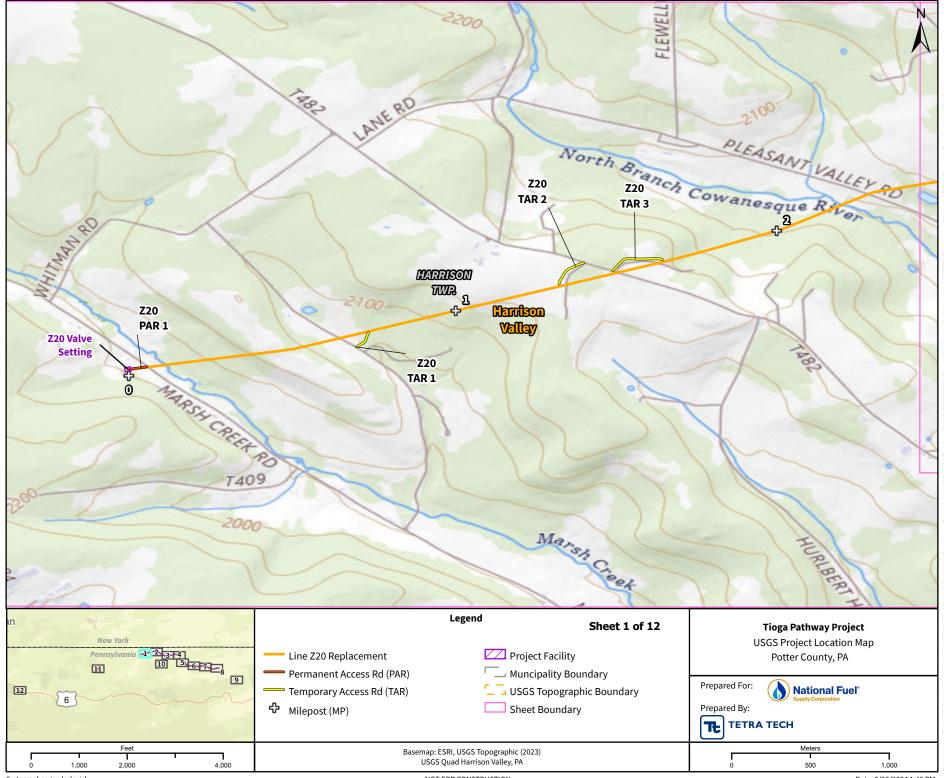
40 CFR §117.21

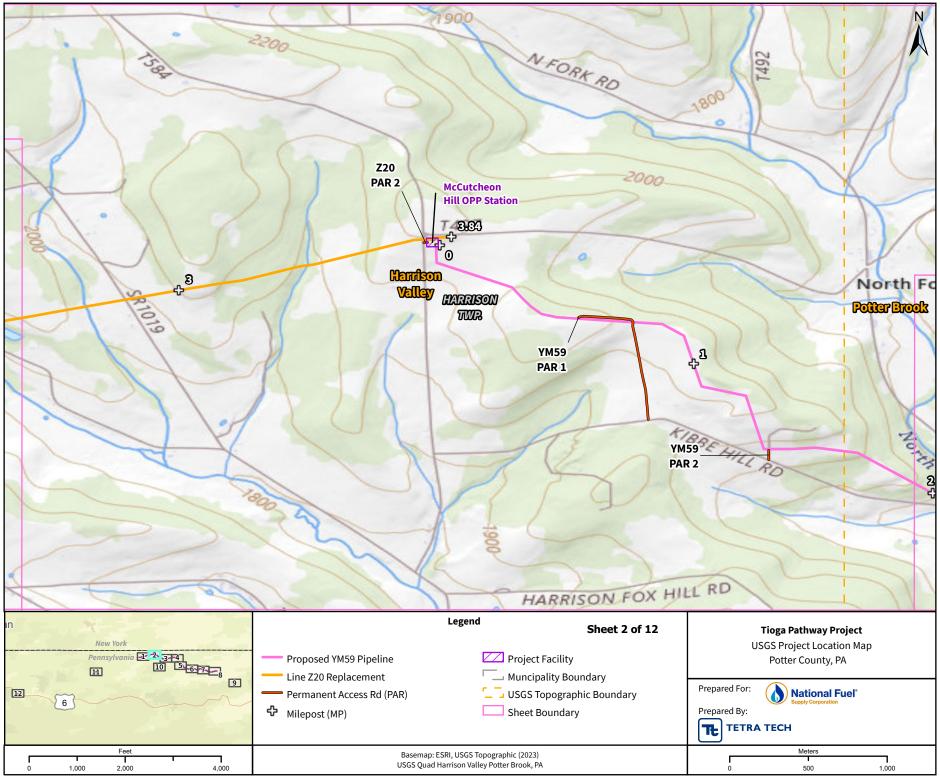
40 CFR §302.4

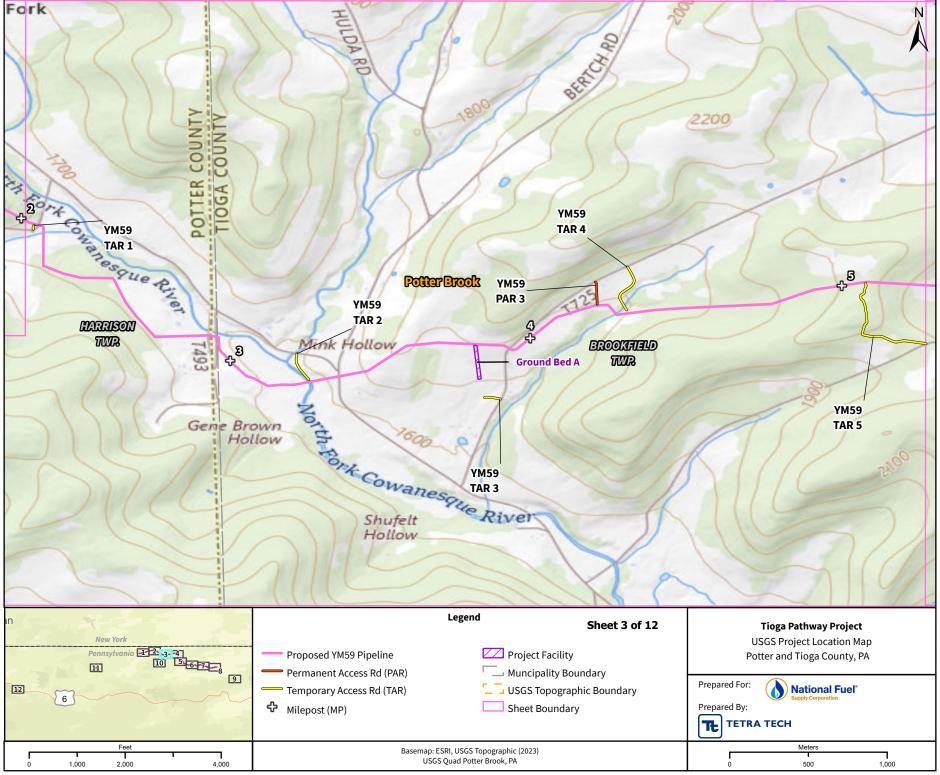
Guidelines for the Development and Implementation of Environmental Emergency Response Plans. Pennsylvania Department of Environmental Protection. Document #400-2200-001. September 2001.

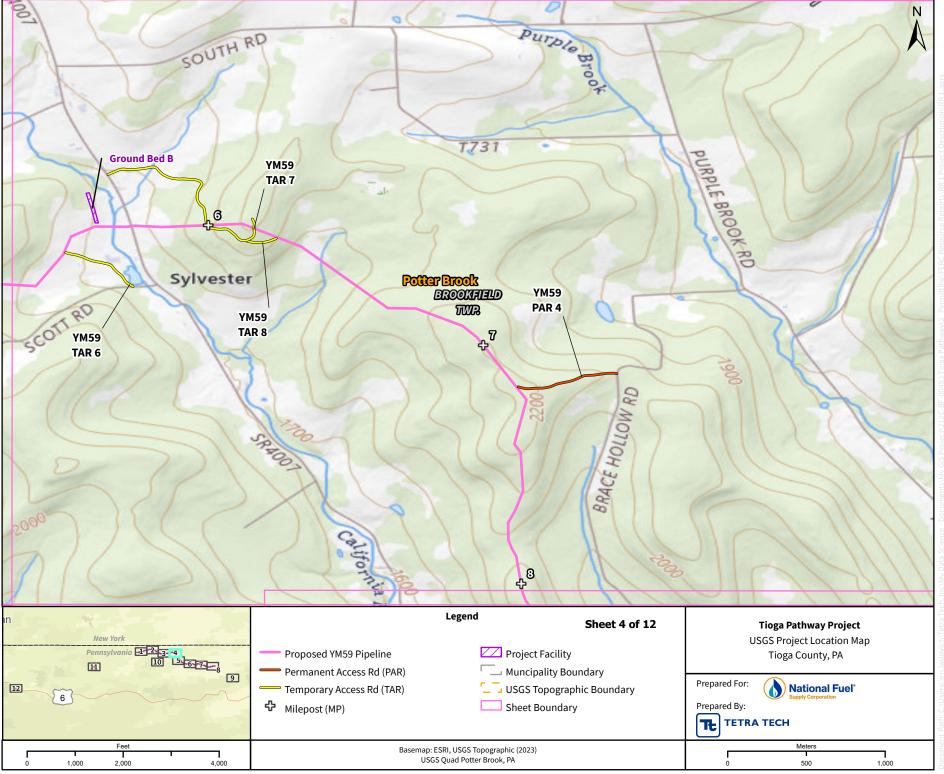


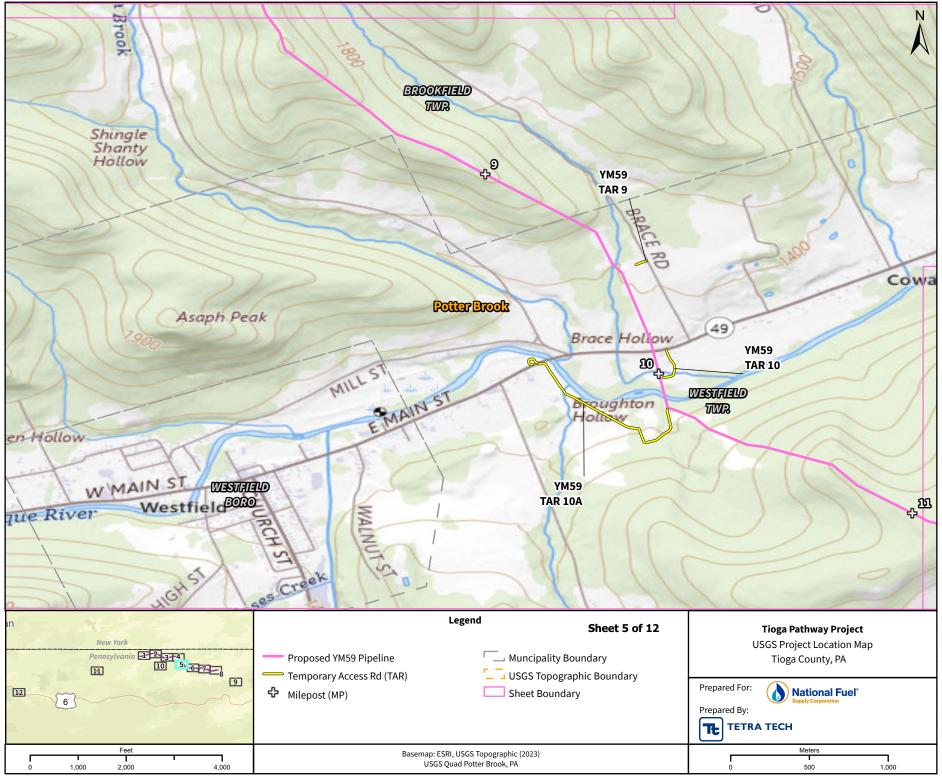


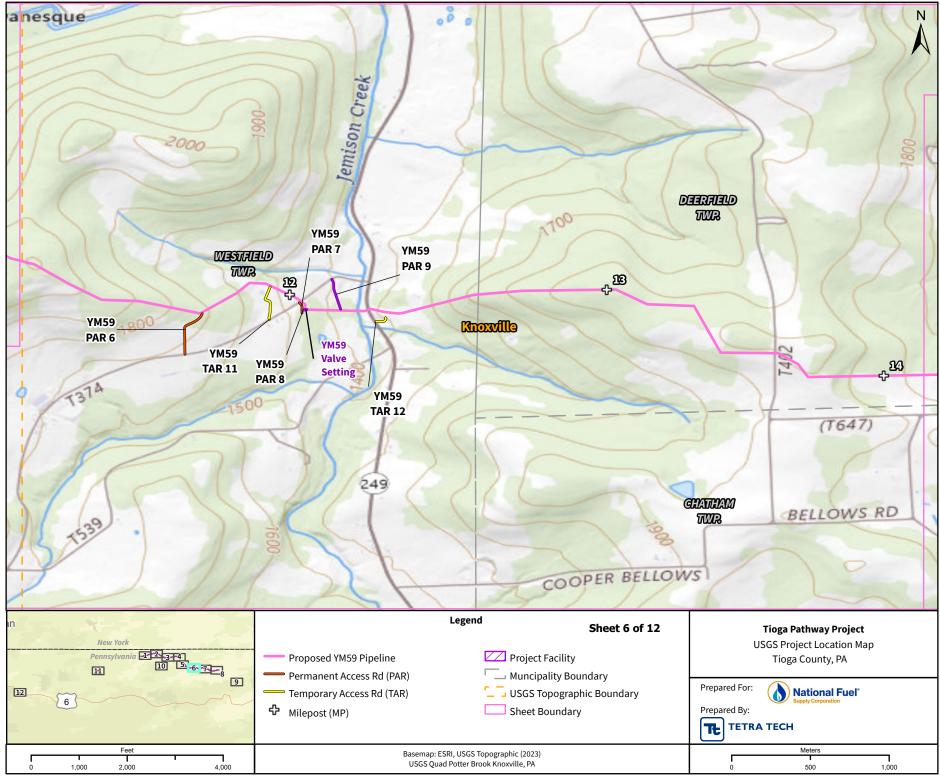


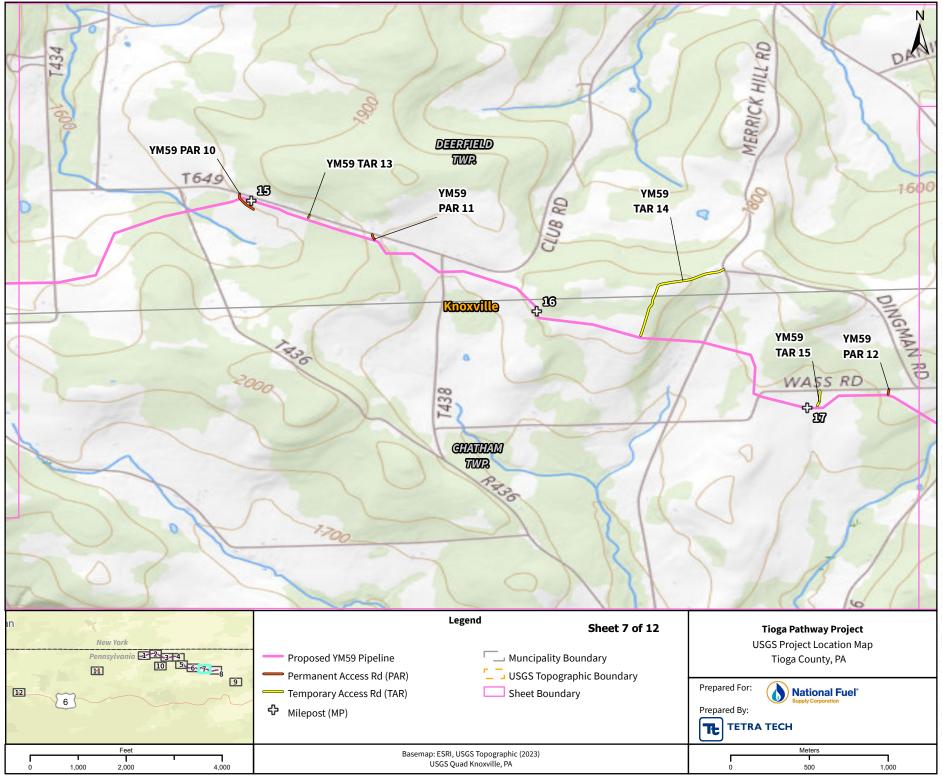


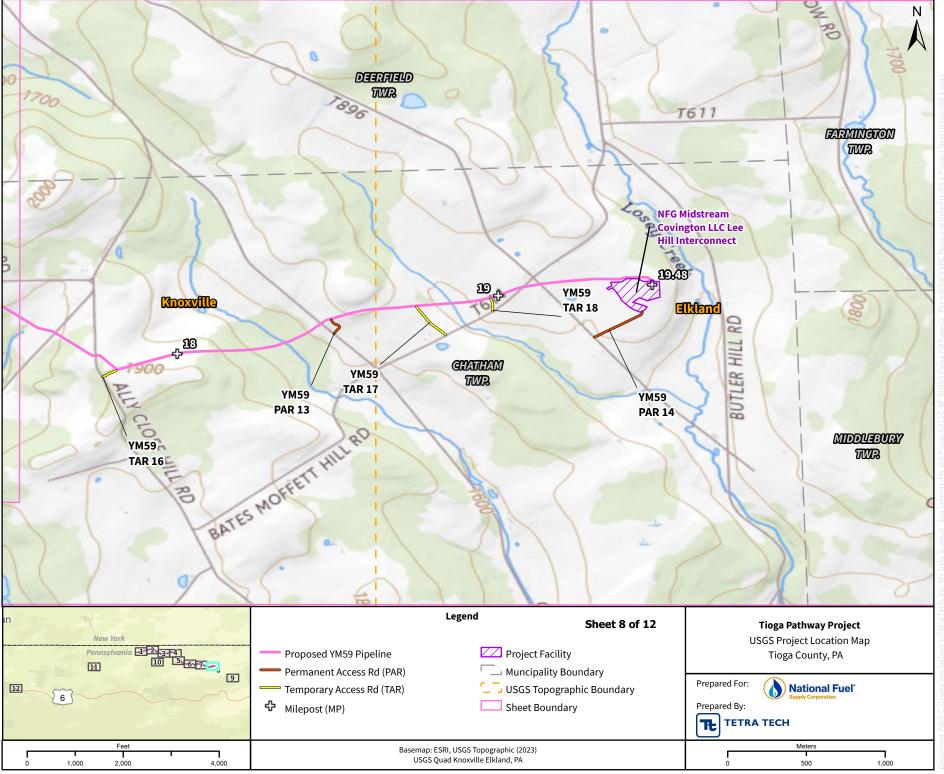


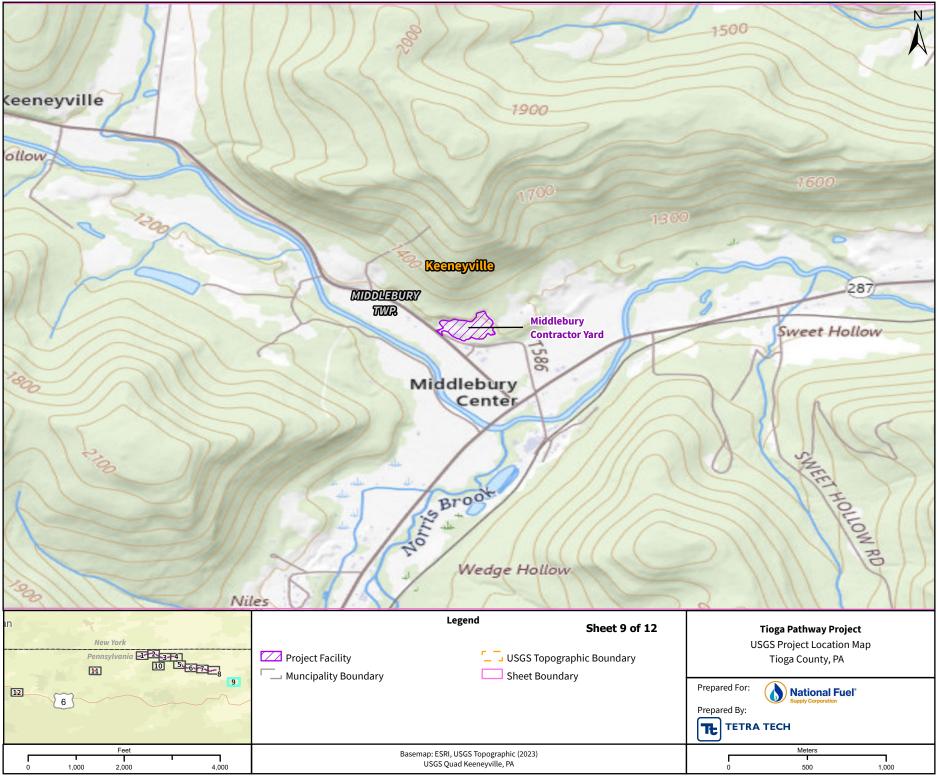


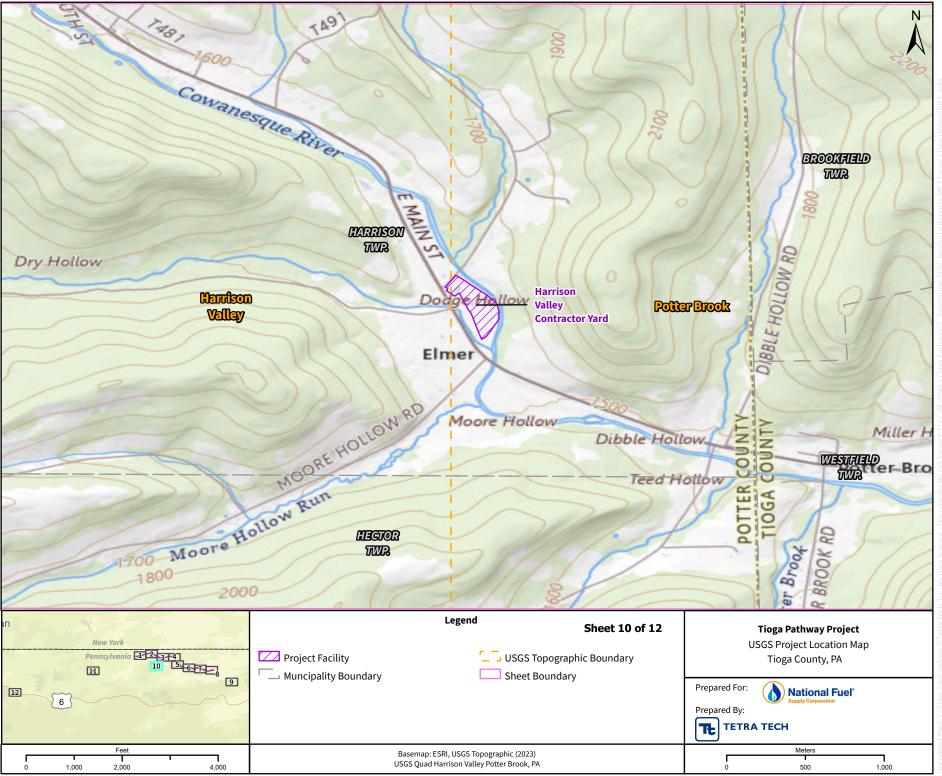


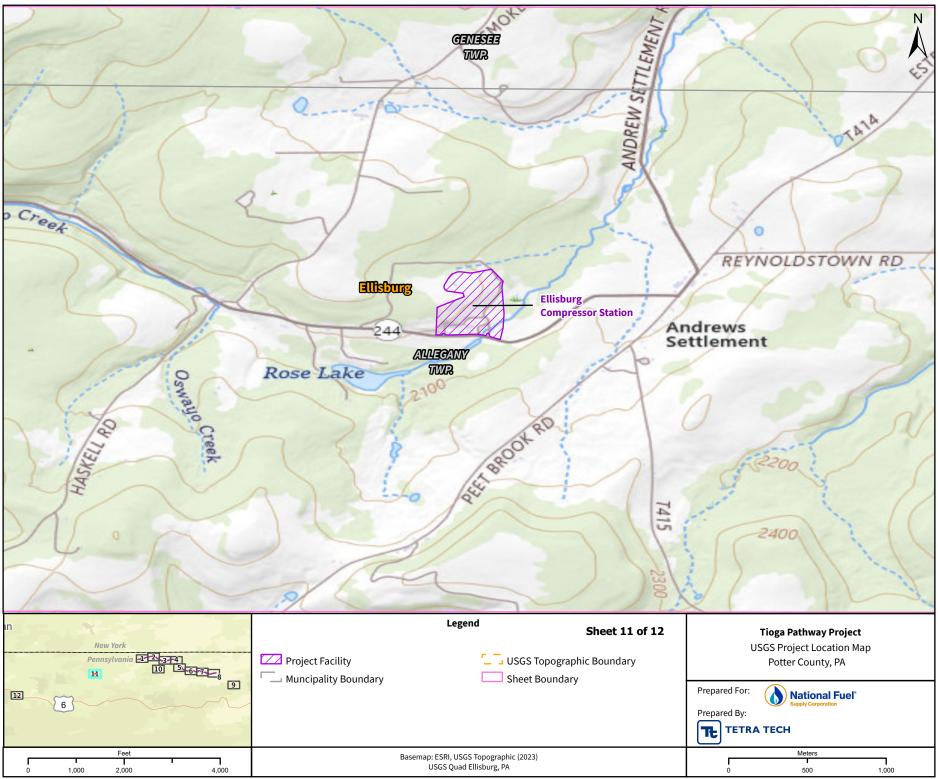


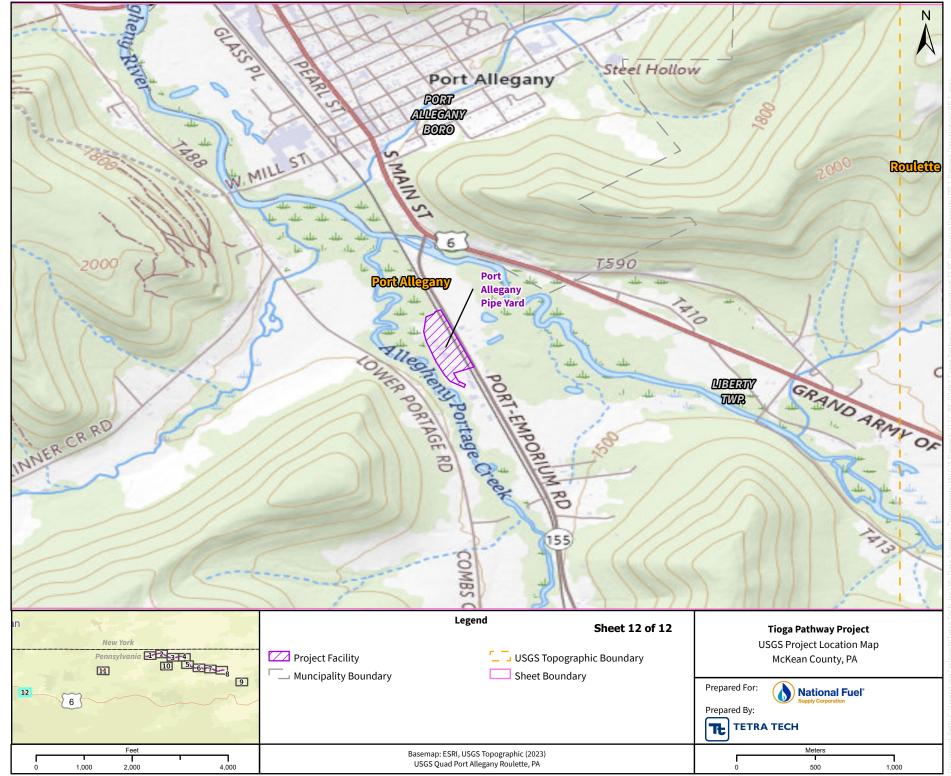


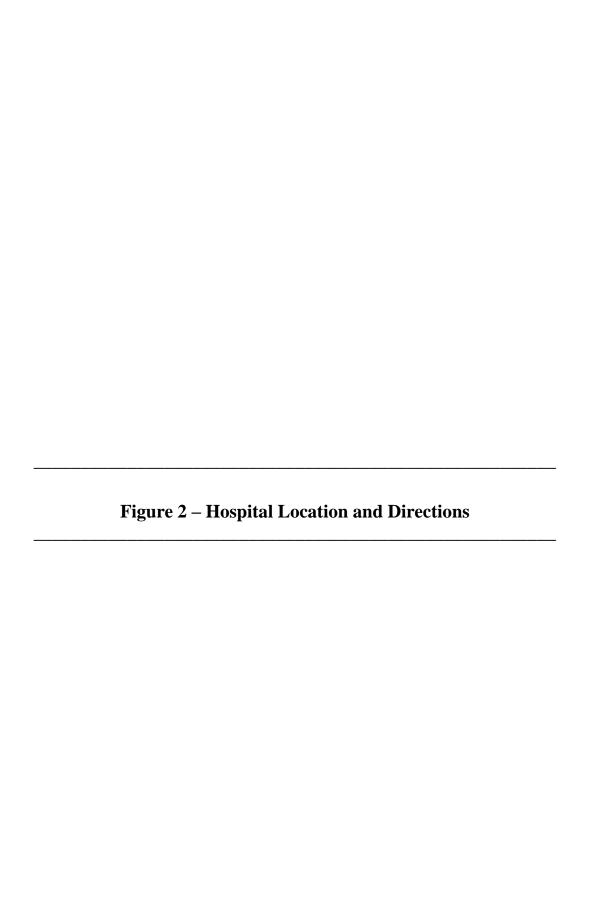
















Map data ©2024 2 mi L

1005 Marsh Creek Rd Mills, PA 16937

1. Head southeast on Marsh Creek Rd toward Graves Rd 3 min (2.2 mi)

Follow State Rte 49 W to State Rte 4013 in Allegany **Township**

17 min (14.2 mi) Turn right onto State Rte 49 W 5.0 mi Turn right onto State Rte 49 W/North St Continue to follow State Rte 49 W 9.2 mi

Follow N Hollow Rd to E 2nd St in Coudersport

1 0110	** ! *	Tionow Na to E zila ot ili ooddersport	
←	4.	Turn left onto State Rte 4013	10 min (7.2 mi)
\rightarrow	5.	Turn right to stay on State Rte 4013	0.2 mi
←	6.	Turn left onto N Hollow Rd/Sr4013	0.2 mi

- - Continue to follow N Hollow Rd

		6./ mi
\leftarrow	7. Turn left onto E 2nd St	
		30 sec (0.2 mi)
←	8. Turn left	
	Destination will be on the left	
		1 min (456 ft)

UPMC Cole

1001 E 2nd St, Coudersport, PA 16915



Lee Hill Interconnect, WJ3Q+4W, Shortsville, PA Drive 14.6 miles, 24 min 16935 to UPMC Wellsboro, 32 Central Ave, Wellsboro, PA 16901



Map data ©2024 2 mi

Lee Hill Interconnect

WJ3Q+4W, Shortsville, PA 16935

Take Locey Creek Rd to State Rte 249 S in Middlebury Center

↑	1.	7 Head southeast toward Lee Hill Rd/T896	min (4.5 mi)
\leftarrow	2.	Turn left onto Lee Hill Rd/T896	0.2 mi
→	3	Turn right onto Butler Hill Rd/Locey Cree	0.6 mi
		Rd/Osceola-Kenneyville Rd Continue to follow Locey Creek Rd	
	_		3.7 mi

Follow State Rte 249 S, PA-287 S and US-6 E to Grant St in Wellsboro

***			45 : (0.0 !)
5	4.	Slight left onto State Rte 249 S	15 min (9.8 mi)
\rightarrow	5.	Turn right onto PA-287 S	2.1 mi
←	_	Turn left onto US-6 E Pass by Pizza Hut (on the right in 2.5 n	4.6 mi ni)

			2.7 mi
↑	7.	Continue straight onto Main St	,
←	8.	Turn left onto Central Ave	0.2 mi
			0.2 mi
Cont	inue	on Grant St to your destination	1 min (0.2 mi)
\rightarrow	9.	Turn right onto Grant St	— 1 min (0.2 mi)
\rightarrow	10.	Turn right	0.1 mi
\rightarrow	11.	Turn right	79 ft
			210 ft

UPMC Wellsboro

32 Central Ave, Wellsboro, PA 16901

Atta Emergency C	achment 1 Contact Information
Atta Emergency C	achment 1 Contact Information
Atta Emergency C	achment 1 Contact Information
Atta Emergency C	achment 1 Contact Information

EMERGENCY CONTACT INFORMATION

In the event of an emergency, the on-site coordinator shall first ensure the safety of all personnel and, if possible, contain any spill or other event to the extent practicable. Upon initial containment of a spill or neutralization of a threat to personnel health, the on-site coordinator shall follow the chain of command and contact necessary individuals listed below.

Operator Information	Key Emergency Numbers
Site Name: Tioga Pathway Project	Construction Manager / Emergency Coordinator:
Site Location: Lat: 41.9669 (Begin)	Name: Chris Davis Phone: 814-871-8998
Lon: -77.7182	Environmental Coordinator / Plan Administrator: Name: Lauren McMillan
Lat: 41.9033 (End) Lon: -77.3609	Phone: 814-871-8195
Operator:	PADEP (Northcentral Region): 570-327-3636 (24 hours)
National Fuel Gas Supply Corporation 1000 State Street	USEPA National Response Center (NRC):
Erie, PA 16501	800-424-8802
Chain of Command:	County Department of Emergency Services: Potter County.: 814-274-8900
Contact the following individuals in the order listed in the event of an accidental spill or emergency on-site.	Tioga County.: 570-724-9110
	Closest Fire Station:
Emergency Coordinator: Name: Chris Davis	Harrison Township Volunteer Fire Department Harrison Valley, PA
Phone: 814-871-8990	814-334-5253
Environmental Coordinator:	Crary Hose Company
Name: Lauren McMillan Phone: 814-871-8195	Westfield, PA 814-367-2933
Land Coordinator:	Chatham Township Volunteer Fire Department
Name: Nate Duffy Phone: 585-738-4667	Little Marsh, PA 570-376-3100
	Closest Hospital: UPMC Wellsboro
	32 Central Avenue
	Wellsboro, PA 16901
	570-723-7764
	PA Emergency Management Agency: 800-424-7362 or 717-651-2001
	PA Game Commission (Northcentral Region): 570-398-4744
	PA Fish and Boat Commission (Northcentral Region): 814-359-5250

3800-FM-BCW0271d Rev. 12/2019 Inspection Report

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF CLEAN WATER

pennsylvania DEPARTMENT OF ENVIRONMENTAL PROTECTION

CHAPTER 102 VISUAL SITE INSPECTION REPORT

	GENERAL INFO	RMATION					
Inspection Date:	Inspection Time:	AM	1/PM	Inspectio	n No.:		
Inspection Type:	Preci	pitation in Pre	vious 24 ho	ours:	ir	nches	
Current Site Cond	itions:	Stabilized [] Snow Co	overed			
Current Weather C	Conditions: Rain/Sleet/Snow Overcas	t 🗌 Sunny/F	Partly Sunn	у			
Permittee Name:		Inspe	ctor Name:				
Permittee Address		Inspec	ctor Phone:				
City, State, ZIP:		Insp	ector Firm:				
Project Name:		Insp	ector Title:				
Municipality:			County:				
Permit Type:	PAG-02 IP ESCGP ESP	F	Permit No.:				
	INSPECTION INF	ORMATION					
	Areas for Inspection	Check if Inspected		Probler	ms Observed	 j	
	nave been cleared and grubbed, graded, otherwise disturbed and are not yet stabilized.						
2. BMPs installed	d to comply with permit.						
	ste, borrow and equipment storage and areas covered by permit or E&S Plan approval.						
	stormwater flows within the site, including designed to divert, convey and/or treat						
5. Discharge poi	nts on-site.						
6. Locations w implemented.	here stabilization measures have been						
Questions					Checl	k One	
7. Are the approx	ved E&S Plan and drawings available on-site?				☐ Yes ☐	No [□ N/A
8. Are the approx	ved PCSM Plan and drawings available on-site?				☐ Yes ☐	No [□ N/A
9. Are E&S BMP	s properly installed, operational, and working as	intended?			☐ Yes ☐	No [□ N/A
10. Are PCSM BN	MPs properly installed, operational, and working	as intended?			☐ Yes ☐	No [□ N/A
11. Has a PPC PI	an been prepared, implemented, and available o	on-site?			☐ Yes ☐	No [□ N/A
12. Is all earth dis	turbance within the permitted limit of disturbance	?			☐ Yes ☐	No [□ N/A
13. Have all dist stabilized?	urbed areas in which disturbance has cease	ed for more t	than 4 day	ys been	☐ Yes ☐	No [□ N/A

3800-FM-BCW0271d Rev. 12/2019 Inspection Report

Questions		Check One
14. Is the approved construction sequence	being followed?	☐ Yes ☐ No ☐ N/A
15. Are areas intended for PCSM BMPs runoff?	being protected from compaction and sediment laden	☐ Yes ☐ No ☐ N/A
16. For Questions 7 through 15, explain ar	y answers of "No" in the space below or on a separate sh	eet.
17. Are there signs of visible accelerated site?	erosion and sedimentation due to discharges from the	☐ Yes ☐ No ☐ N/A
18. Are there any unauthorized non-storm	vater discharges occurring from the site?	☐ Yes ☐ No ☐ N/A
	g during inspection, contain floating solids, foam, scum, served deposits or produce an observable change in the eiving water?	☐ Yes ☐ No ☐ N/A
20. Were any instances of non-compliance	observed during the inspection?	☐ Yes ☐ No
21. For Questions 17 through 20, explain a	any answers of "Yes" in the space below or on a separate	sheet.
22. Are critical stages of implementation of	the PCSM Plan occurring at the time of inspection?	☐ Yes ☐ No ☐ N/A
23. If No. 22 is "Yes", is or was a licensed	professional present on-site and responsible?	☐ Yes ☐ No
24. Has any fill material excavated on-sit tested for clean fill since the last inspec	e, imported to the site, or exported from the site been ction? (if "Yes" attach Form FP-001 to this report)	☐ Yes ☐ No
	all new operators that have commenced work on the Code § 102.1 for the definition of "operator").	project site since the last
Name:	Name:	
Address:	Address:	
City, State, ZIP:	City, State, ZIP:	
For new operators listed above, has the and submitted?	e Transferee/Co-Permittee Application been completed	☐ Yes ☐ No
26. Corrective Action – Describe any corr	rective actions that should be taken by the permittee to co	mply with the permit.
27 Have photograph(s) been taken during	the inspection and are attached to this report?	☐ Yes ☐ No
28. Are additional pages attached to this re	ероп?	∐ Yes ∐ No
direction or supervision in accordance with a syst submitted. Based on my inquiry of the person of information, the information submitted is, to the best	104 (relating to unsworn falsification)) that the information reported lem designed to assure that qualified personnel properly gathered or persons who manage the information, or those persons directly st of my knowledge and belief, true, accurate, and complete. I am a the possibility of fine and imprisonment for knowing violations.	and evaluated the information responsible for gathering the
Inchactor Signatura	Data of Cianatura	
Inspector Signature	Date of Signature	

Attachment 3
Employee Training Attendance Record

PPC PLAN TRAINING ATTENDANCE RECORD

Training Topic: PPC Plan Review	Date:
Instructor:	Training Aids: PPC Plan
Location:	Time:
Attendees – Please print and sign you	r name legibly. Use additional sheets if necessary.
No. Print Name	Signature
1.	
2.	<u> </u>
3.	
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27	
28	
29.	
30.	

Attachment 4 Drum Log

WASTE DRUM/CONTAINER LOG

LOCATION

EMPLOYEE NAME	Start DATE	RECEIVED FROM	MATERIAL		CONTAINER		Container NUMBER	TRANSFERRED TO CONTAINER NUMBER OR MANIFEST #	DATE RELEASED	RELEASED TO
	DAIL		LIQUID	SOLID	CONTENTS	SIZE	Container Noniber	NOMBER OR MARKEEST #		
				0000						

^{*}Drum Number: The Drum Number will start with the station/project name then a dash followed by the two digit calendar year (ex. 2013 = 13), then a dash followed by the sequential number in the year

Attachment 5
Chemical Storage Log

CHEMICAL STORAGE CONTAINER LOG											
This table shall be a complete list of chemical storage containers (a)	boveground containers and completely buried tanks) with a capac	ity of 55 U.S. gallons or more.									
For, mobile/portable containers; an estimated number of contained	oveground containers and completely buried tanks) with a capacity of 55 U.S. gallons of stype of chemical and anticipated capacites shall be provided. Type of Chemical Shell Capacit										
Storage Container (indicate whether aboveground or buried)	Type of Chemical	Shell Capacity									
I											