Emergency Management Plan
Quakertown Compressor Station
May 2020

Prepared For:

Adelphia Gateway, LLC
1415 Wyckoff Road
Wall, NY 07719

NV5

Adelphia Gateway Project

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1.0 INTRODUCTION

The Adelphia Gateway Project (Project) is a natural gas transmission project owned and operated by Adelphia Gateway, LLC (Adelphia) that includes the construction and operation of two new compressor stations, two new pipeline laterals, multiple meter and regulator stations, and other appurtenant facilities. NV5, LLC (NV5), on behalf of Adelphia, developed this Emergency Management Plan (EMP) for the Quakertown Compressor Station, located in Bucks County, Pennsylvania.

The EMP was developed for use during construction and operation activities at the Quakertown Compressor Station to minimize potential hazards to human health and the environment from fires, explosions, releases of hazardous materials, and any other crises, which may require immediate emergency response by Adelphia personnel and/or outside emergency services. Adelphia will immediately implement the provisions of this EMP, should such a situation arise.

2.0 EMERGENCY COORDINATION

Adelphia has assigned emergency coordinators (ECs) that are responsible for the implementation of this EMP. Table 1 provides the contact information for the ECs at the Quakertown Compressor Station.

Table 1. Emergency Coordinators for the Quakertown Compressor Station

Role	Name	Phone Number
Primary Emergency Coordinator	Mr. Pat Scott	(812) 620-8256
Alternate Emergency Coordinator	Mr. Curtis Rounds	(484) 226-4339
Alternate Emergency Coordinator	Mr. Ken Scott	(607) 377-2610

There will be at least one EC at the facility or available during off-hours to coordinate activities during emergency response measures.

3.0 EMERGENCY RESPONSE STEPS

The on-site or on-call EC will be responsible for responding to emergencies at the facility, in accordance with this EMP. Emergency response activities can be broken into five primary steps, for which greater detail is provided the sections below:

1. Assessing the Emergency;
2. Evacuating the Site (if necessary);
3. Notifying Appropriate Parties;
4. Overseeing Response Activities; and
5. Conducting Post-Incident Reporting.

A flow chart summarizing the steps to follow in an emergency is provided as Attachment 1.

3.1 ASSESSING THE EMERGENCY

At the onset of an emergency situation, the EC must respond immediately to the scene of the incident and assess the nature, source, and extent of the emergency. The EC must practice caution when entering the scene of the emergency to avoid personal harm/injury (e.g., if appropriate, wear personal protective gear; stand up-wind of smoke or vapors, etc.). For the purposes of this plan, there are two primary types of emergencies: minor and major.

Minor emergencies *can* be safely handled on-site by Adelphia personnel.

Major emergencies *cannot* be handled by Adelphia staff and require the assistance of outside responders.

The EC must use his/her best professional judgment when determining whether an emergency is minor or major. For example some situations, such as workplace violence, the threat of an explosion, severe weather conditions (other than direct lightning strikes), burglaries, and utility outages could be classified as either minor or major emergencies depending on the circumstances.

3.1.1 Examples of Minor Emergencies

Minor emergencies include, but are not necessarily limited to the following:

- Incipient fires. These are fires that can be readily extinguished by a portable fire extinguisher and do not involve nor threaten personnel and/or hazardous chemicals/waste.
- Incidental spills and releases. A spill becomes a release when it leaves the site property. This can occur should the material enter into a stormwater sewer, migrates beyond the fence-line or is spilled on soil and can enter the groundwater system. Incidental spills/releases are those that are not emitting gas or otherwise reacting, do not pose an immediate health hazard to site personnel, and can be mitigated and cleaned up by a small number of Adelphia personnel in several minutes without having to use anything but their everyday personal protective equipment required at the worksite.

- Minor accidents and injuries. Minor injuries can be adequately addressed by onsite personnel by using basic first aid methods. Minor accidents do not result in substantial damage to the facility and/or put onsite personnel in danger.
- Controlled gas leaks. These are gas leaks that are confined to an isolated work area, can be controlled, and pose no hazard to personnel.

3.1.2 Examples of Major Emergencies

Major emergencies include, but are not necessarily limited to, the following:

- Uncontrolled fires. These are fires that are not capable of being handled by a portable fire extinguisher and/or involves or threatens personnel and/or hazardous chemicals/waste.
- Explosions. Any explosion that has occurred either on-site or off-site with the potential to affect the facility or its personnel should be considered a major emergency.
- Non-incidental spills/releases. These are spills or releases that:
    - cannot be contained on-site and pose an imminent fire or explosion hazard, or personal injury;
    - cannot be contained on-site resulting in off-site environmental contamination (soil, surface or groundwater);
    - can be contained on-site but could result in environmental contamination; and/or
    - can be contained on-site but, because of their nature and magnitude, pose an actual threat to personnel and the environment.
- Serious accidents and injuries. Serious injuries cannot be adequately addressed by onsite personnel using by basic first aid methods. Serious accidents result in substantial damage to the facility and/or put onsite personnel in danger.
- Bomb and terrorist threats. All such threats received must be taken seriously and are considered to be major emergencies.
- Uncontrolled gas leaks – This is a gas leak that cannot be contained and/or poses an imminent hazard to personnel.
- Direct lightning strikes.

3.2 EVACUATING THE SITE (IF NECESSARY)

Once the EC has assessed the situation, he/she must determine if an evacuation is required. Many emergencies do not require evacuations; others require either a partial or facility-wide evacuation. In the event of a partial evacuation, only the areas directly affected by the emergency would be evacuated. Table 2 identifies emergencies that require evacuations and the type of evacuation necessitated by each.

Table 2. Emergencies Requiring Evacuations

Emergency	Evacuation Type	
	Partial*	Facility-wide
Uncontrolled Fires		X
Incipient Fires	X	
Explosions	X (for explosions that can be isolated and contained)	X (for explosions that cannot be isolated and contained)
Non-incidental spills and releases	X (for non-incidental spills and releases that can be isolated and contained)	X (for non-incidental spills and releases that cannot be isolated and contained)
Controlled gas leaks	X	
Uncontrolled gas leaks		X
Bomb threat		X
Direct lightning strike		X

* In a partial evacuation, only the area(s) that are directly affected by the emergency will be evacuated. The area(s) evacuated under a partial evacuation will be determined by the EC in charge at the time of response.

For emergencies not listed in Table 2, it is the EC's responsibility to determine whether an evacuation is necessary and what type of evacuation is warranted.

Once the EC has assessed the threat, he/she must immediately activate internal communication systems (e.g., paging system, direct verbal communication) to notify facility personnel of the imminent danger and whether or not an evacuation is necessary.

3.3 EVACUATION PROCEDURES

In the event of a fire or gas leak, fire eyes installed at each corner of the Quakertown Compressor Station will be the primary signal to notify personnel and visitors to evacuate the building. In the event of a power failure or other conditions that may render the fire alarm inoperative, the EC will verbally communicate the need for an evacuation. In the event of other types of emergencies necessitating an evacuation, the EC will also use verbal communication to signal the evacuation.

After the sounding of the evacuation signal, all work not associated with emergency containment must stop, and employees and visitors must calmly exit the building via the closest exit. Employees must report to the designated assembly area (unless it is unsafe to do so). The designated assembly area is the Main Parking Lot. An Emergency Evacuation Plot Plan will be included in this EMP as Attachment 2 prior to construction. The EC must consider the location of the designated assembly area relative to the emergency. In the event that the designated assembly area is not a safe area to

report to, the EC must identify an alternative assembly location and notify personnel when signaling the evacuation.

Once employees are assembled, it is the responsibility of the Site Supervisors to take a head count and notify the EC of any missing and/or injured personnel. If there are no Site Supervisors on-site, the EC (or a person appointed by the EC) will be responsible for determining whether or not there are any missing personnel. If it is determined that personnel are missing or an injury has occurred, the EC will immediately notify his/her direct supervisor to get further instructions. Work would not resume at the site until proper notification has been provided by Adelphia personnel.

Adelphia personnel will conduct annual evacuation drills to ensure that all employees are familiar with evacuation procedures. Local emergency responders will be invited to attend and participate.

3.4 NOTIFYING APPROPRIATE PARTIES

At the onset of an emergency but after evacuation has taken place (if necessary), the EC will ensure that the appropriate parties are notified of the emergency and the need for outside assistance. In general, the EC must use the guidelines below along with his/her best professional judgment in determining if (and which) notifications are required depending on the nature and extent of the emergency. The EC has the authority to delegate notification responsibilities to appropriate site personnel.

- The EC (or appointed personnel) would notify the federal Occupational Safety and Health Administration (OSHA) in the event that there was a fatality or hospitalization of three or more people.
- The EC (or appointed personnel) would notify the PADEP in the event of a discharge of oil material into the soil or waterways.
- The EC (or appointed personnel) would notify the PADEP, Bucks County Emergency Management Services, and the Pennsylvania Emergency Management Agency (PEMA)[1] if a release occurs from a storage tank which enters a water supply or which threatens the water supply of downstream users.
- The EC (or appointed personnel) would notify Adelphia's Spill Response Contractor in the event of a spill that can be easily contained and cleaned-up by on-site personnel.
- The EC (or appointed personnel) would notify the fire department in the event of an uncontrolled release of natural gas. A general rule of thumb for gas leaks is, if it can be smelled at the perimeter of the facility, it can cause problems for the community.
- The EC (or appointed personnel) would notify the National Response Center and PADEP in the event that a reportable quantity (RQ) of a hazardous substance has been released into the environment or if any amount of petroleum has been released into the environment. A list of the hazardous substances on-site and their associated RQs is included in the Facility Data Sheet (see, Attachment 3).

[1] Notifications to PEMA should be made using the agency's online form, which is available at: https://www.pema.pa.gov/About-Us/Contact-Us/Pages/default.aspx.

- The EC (or appointed personnel) would report all offsite releases of hazardous materials to the Bucks County Emergency Management Services. In making a determination whether an offsite release has occurred, the EC would also consider all resulting air emissions.

Table 3 provides contact information for emergency notifications. Contact information can also be found on Emergency Assistance Signs, which are posted throughout the facility. An example of these signs can be found in Attachment 4. Directions with maps from the facility to nearby hospitals is provided as Attachment 5.

Table 3. Contact Information for Emergency Notifications

Agency/Party	Phone Number
Police	911
Fire	911
Ambulance	911
Hospitals	St. Luke's Quakertown Hospital (215) 538-4500 Grand View Health (215) 453-4000
Poison Control Center	(800) 222-1222
PADEP	(800) 541-0250
National Response Center [a]	(800) 424-8802
Bucks County Emergency Management Services	(215) 340-8700
Spill Contractors	Lewis Environmental (800) 258-5585
OSHA [b]	(800) 321-6742
Adelphia External Communications Director	Michael Kinney (732) 938-1031

[a] Notify the National Response Center if a RQ (Reportable Quantity) of a Hazardous Substance has been released into the environment or if any amount of petroleum has been released into the environment.
[b] Notify OSHA within eight hours for a single fatality or hospitalization of three or more persons

Adelphia has provided the following local authorities and hospitals with copies of this EMP, including facility layout and hazardous material storage diagrams: Quakertown Police Department; Pennridge Regional Police Department, the Richland Township Police Department; the Quakertown Fire Department; the Perkasie Fire Company #1 William Penn Fire Department; the Trumbauersville Fire Department; St. Luke's Quakertown Hospital; Grand View Health; and Mr. Scott T. Foster, Director of Bucks County Emergency Management/ Services.

3.5 OVERSEEING RESPONSE ACTIVITIES

During an emergency, the EC must take all reasonable steps necessary to ensure that fires, explosions, discharges, or other emergency situations are handled properly. In the event that outside assistance is required to respond to the emergency, the EC will provide a detailed description of the incident and the on-going response measures to the Commander-in-Charge upon his/her arrival. Once informed, the local authorities will take responsibility for the continued response to the crisis at hand. The EC will work with outside responders, keeping them abreast of available equipment and personnel for the response. The EC will remain as a part of a Unified Command for the duration of the emergency response.

Once the emergency is remedied, that EC must ensure the following are satisfactorily completed. The EC has the authority to delegate part of these responsibilities to appropriate site personnel who are able to perform them.

- All hazardous materials and hazardous material residues collected during the response activities are handled in accordance with both federal and state hazardous waste regulations until the materials can be disposed of properly;
- All emergency equipment is decontaminated and refit for use prior to the start-up of operations. Section 4 of this EMP provides a list of the emergency equipment located at the facility; and
- When appropriate, prior to start-up, appropriate federal, state, and local authorities are notified that the facility has resolved the emergency situation, that hazardous materials have been secured and cleaned up, and that emergency equipment is returned to a stand-by mode.

3.6 CONDUCTING POST-INCIDENT REPORTING

For all emergencies, the EC must write a post-incident report that includes the following information:

- company name, address and telephone number of owner or operator;
- name, address, and telephone number of the facility;
- date, time and type of incident (i.e. fire, explosion, release);
- name(s) and quantity of material(s) involved;
- extent of injuries (if any) ;
- assessment of actual or potential hazards to human health or the environment, if possible;
- assessment of the scope and magnitude of the problem;
- description of immediate actions taken;
- quantity and chemical disposition of any recovered materials;
- root cause of the incident;
- preventive measures to be taken moving forward; and
- implementation schedule for follow-up activities, if necessary.

The Post-incident Report Form is provided as Attachment 6. The EC will also have access to an electronic version of the template.

For all major emergencies, the EC must ensure that the report is submitted to the PADEP and the U.S. Environmental Protection Agency (EPA) at the following addresses within fifteen days of the date the emergency took place. Copies of all post-incident reports will be maintained by the EC's supervisor and kept for facility records.

DEP

Director - Bureau of Water Quality Management

Pennsylvania Department of Environmental Protection
909 Elmerton Avenue
Harrisburg, PA 17110

Director - DEP Southeast Regional Office
Pennsylvania Department of Environmental Protection
2 East Main Street
Norristown, PA 19401

EPA

Regional Administrator
U.S. Environmental Protection Agency Region III
1650 Arch Street
Philadelphia, PA 19103

4.0 EMERGENCY EQUIPMENT

Fire Detectors: Fire eyes are employed at the corners of the facility. Should a fire be detected by one of these units, a central alarm is sounded.

Portable Combustible Gas Detector: The facility has a portable combustible gas detector on-site to pinpoint the location of any minor gas leaks, should an employee smell gas. This unit is also employed to authorize the use of hot work, such as burning, welding or use of an open flame.

Fire Extinguishers: Portable "ABC"-type fire extinguishers have been distributed throughout the facility. Extinguishers are inspected annually by a fire protection service company.

Spill Response Equipment: There is a spill response kit on-site at the facility. This kit includes absorbent socks, pads and loose absorbents for handling all types of fluids. In addition, non-sparking tools and empty containers are located at various locations for picking up the spilled material and absorbents.

First Aid Equipment: Emergency first aid kits, eye wash stations, and emergency drench showers have been set up at several strategic locations throughout the facility.

Bloodborne Pathogen Kit: A bloodborne pathogen cleanup kit is located at the facility that consists of bleach, absorbent and medical waste bags.

Personal Protective Equipment: Personal protective equipment such as face shields, goggles, gloves, boots, aprons, Tyvek suits and rain gear are stocked at the facility for personnel use during incidental spill abatement activities.

Drain Covers: The facility has drain covers for stormwater sewer gratings to prevent spilled materials from entering the stormwater system and causing a release.

The Emergency Evacuation Plot Plan, which will be included as Attachment 2 prior to construction, will have the locations of available emergency response equipment.

5.0 HAZARDOUS MATERIALS AND WASTE

A list of the hazardous materials that Adelphia would have on-site is provided in Attachment 3 (Facility Data Sheet). Adelphia will be responsible for updating the hazardous substance information on the Facility Data Sheet, as facility inventory changes.

Adelphia would only generate very minimal quantities of hazardous waste, if any at all. In the event that hazardous waste is produced at the facility, Adelphia would only store hazardous waste on site in a designated area for a period of time not to exceed ninety days. This facility does not receive waste materials from other off-site sources, and procedures are established and maintained for the storage and use of hazardous materials.

6.0 TRAINING

At least once a year Adelphia will conduct an emergency drill (either a field-based drill or desktop drill) at the facility to determine the effectiveness of the emergency procedures, and changes will be made to correct any problems that may arise as a result of an audit of the events that occurred in the drill.

This plan shall also be reviewed and audited after an actual emergency situation. Modifications to this plan will occur in the event of system failure or the revelation of an opportunity for improvement.

At least once per year, emergency response training shall be provided to all facility personnel (including those that work off-site at Adelphia's Pottstown Pennsylvania office), during which roles and responsibilities associated with this plan will be reviewed.

At least once per year, the local emergency responders are requested to visit the facility in order to participate in drills, review facility equipment and layouts and the hazards associated with activities at the facility.

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Attachment 1

Emergency Reponse Action Flow Chart

Asses the Emergency

What is the source and extent of the emergency?

Can it be safely handled by on-site Adelphia Staff (i.e., a minor emergency), or is outside assitance requried (i.e., a major emergency)?

Alert Personnel and Signal Evacuation (if necessary)

Determine whether an evacuation is required. If so, will it be a partial or facility-wide evacuation?

Notify on-site personnel of the emergency situation and whether or not an evacuation is needed (partial or facility-wide)

Notify Appropriate Parties

Notify the appropriate parties of the emergency and the need for outside assitance, as necessary.

Oversee Reponse Activities

MINOR EMERGENCY: Direct and support on-site Adelphia staff to remedy the emergency. Ensure the site and equipment is properly cleaned and decontaminated once response actvities are complete.

MAJOR EMERGENCY: Provide description of incident and on-going reponse measures to the Commander-in-Charge upon his/her arrival, and then hand over control to local authorities. Remain as part of a Unified Command for the duration of the emergency reponse. Ensure that the site and equipment if properly cleaned and decontaminated once reponse activities are complete.

Complete Post-Incident Report

Write the post-incident report and submit to appropriate Adelphia management and agency personnel.

Attachment 2

Emergency Evacuation Plot Plan

To be provided prior to construction

Attachment 3

Facility Data

Facility Data

Site Address: Adelphia Gateway, LLC
Quakertown Compressor Station
Rich Hill Road
Quakertown, PA 18951

Primary Activities: Natural gas compressor station

Primary Hazards:			HMIS Rating[a]			
Hazardous Substance	**Storage**	**RCRA Waste Code**	**RQ lb(kg)[b]**	**Health (H)**	**Flammability (F)**	**Physical Hazard (R)**
Liquid Flammable	Drum	D001	100 (45.4)	2	3	0
Used Oil and Lube Oils	Drum, Day Tanks, Aboveground Storage Tanks	Used Oil	NA[c]	2	2	0
Natural Gas	Pipeline	NA	NA[c]	3	4	0
Ethylene Glycol	Aboveground Storage Tanks.	NA	NA[c]	1	1	0
Solvents	NA	F001-F005	10(4.54) – 5000 (2270)[d]	-[d]	-[d]	-[d]

HMIS = Hazardous Materials Identification System
RCRA = Resource Conservation and Recovery Act of 1976
RQ = reportable quantity
[a] HMIS number ratings range from 0-4, with 4 representing a server hazard and 0 representing a minimal hazard for health hazards and no hazard for flammability and reactivity.
[b] Source = 40 CFR Part 302.4, Table 302.4 "List of Hazardous Substances and their Reportable Quantities".
[c] This substance does not have a designated RQ.
[d] RQs and HMIS ratings vary based on the type of solvent in question.

Emergency Coordinators

Pat Scott	(812) 620-8256
Curtis Rounds	(484) 226-4339
Ken Scott	(607) 377-2610

Attachment 4

Emergency Assistance Sign

Emergency Assistance

To Reach Emergency Services
Dial 911

Quakertown Police Department	**911** or 215-536-5002
Pennridge Regional Police Department	**911** or 215-257-5104
Richland Township Police Department	**911** or 215-536-9500
Quakertown Fire Department	**911** or 215-536-1443
Perkasie Fire Company #1 William Penn Fire Department	**911** or 215-257-6950
Trumbauersville Fire Department	**911** or 215-538-1880
St. Luke's Quakertown Hospital	**215-538-4500**
Grand View Health	**215-453-4000**
PADEP Hotline	**800-541-0250**
Poison Control Center	**800-222-1222**
National Response Center	**800-424-8802**
OSHA	**800-321-6742**
Bucks County Emergency Management Services	**215-340-8700**

When reporting an emergency, provide the following information:

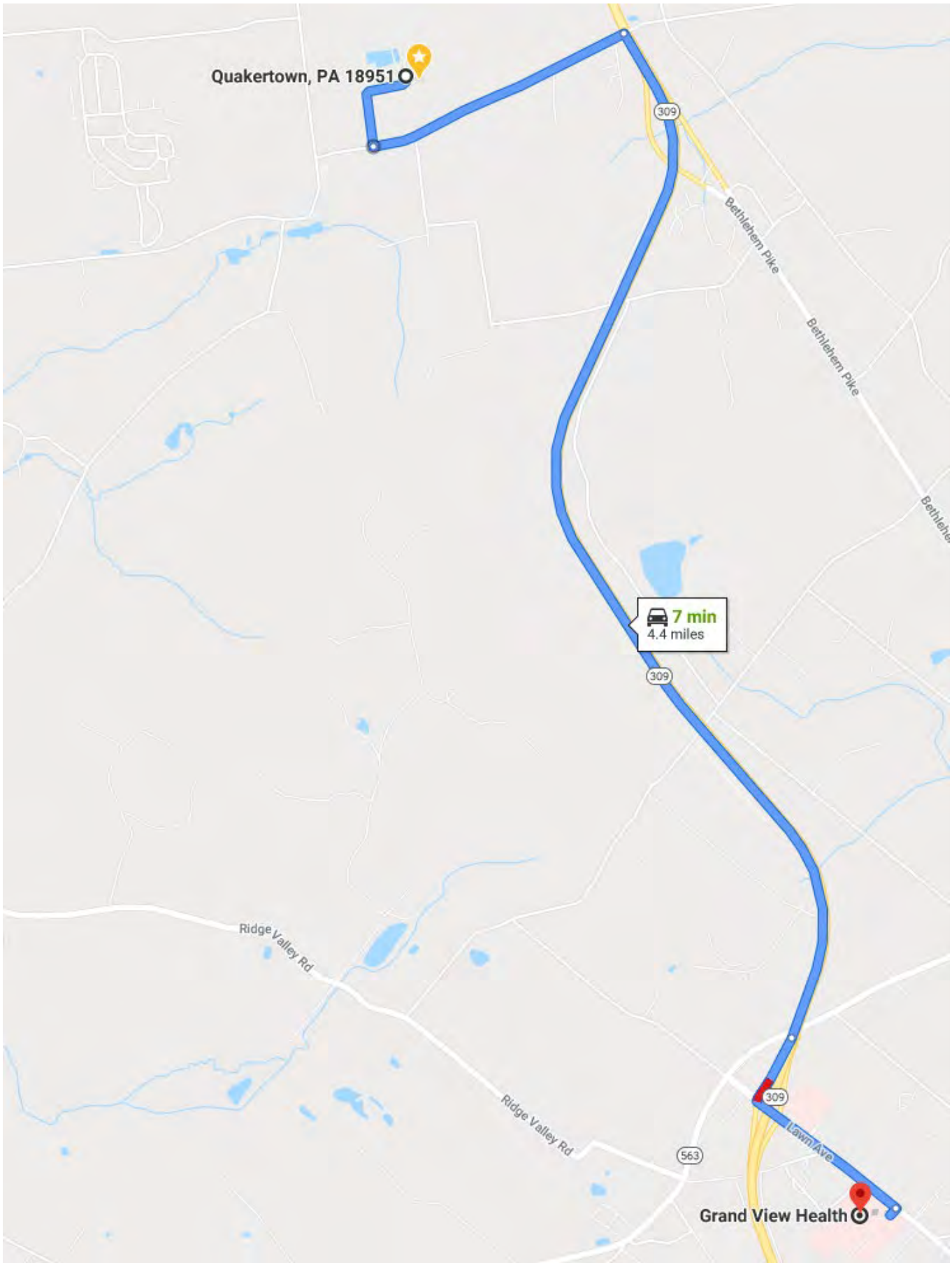
1. Your Name
2. Emergency Location
3. Type of Emergency (e.g., fire, medical, chemical spill)

Attachment 5

Hospital Directions

Driving Direction from Quakertown Compressor Station to Grand View Health

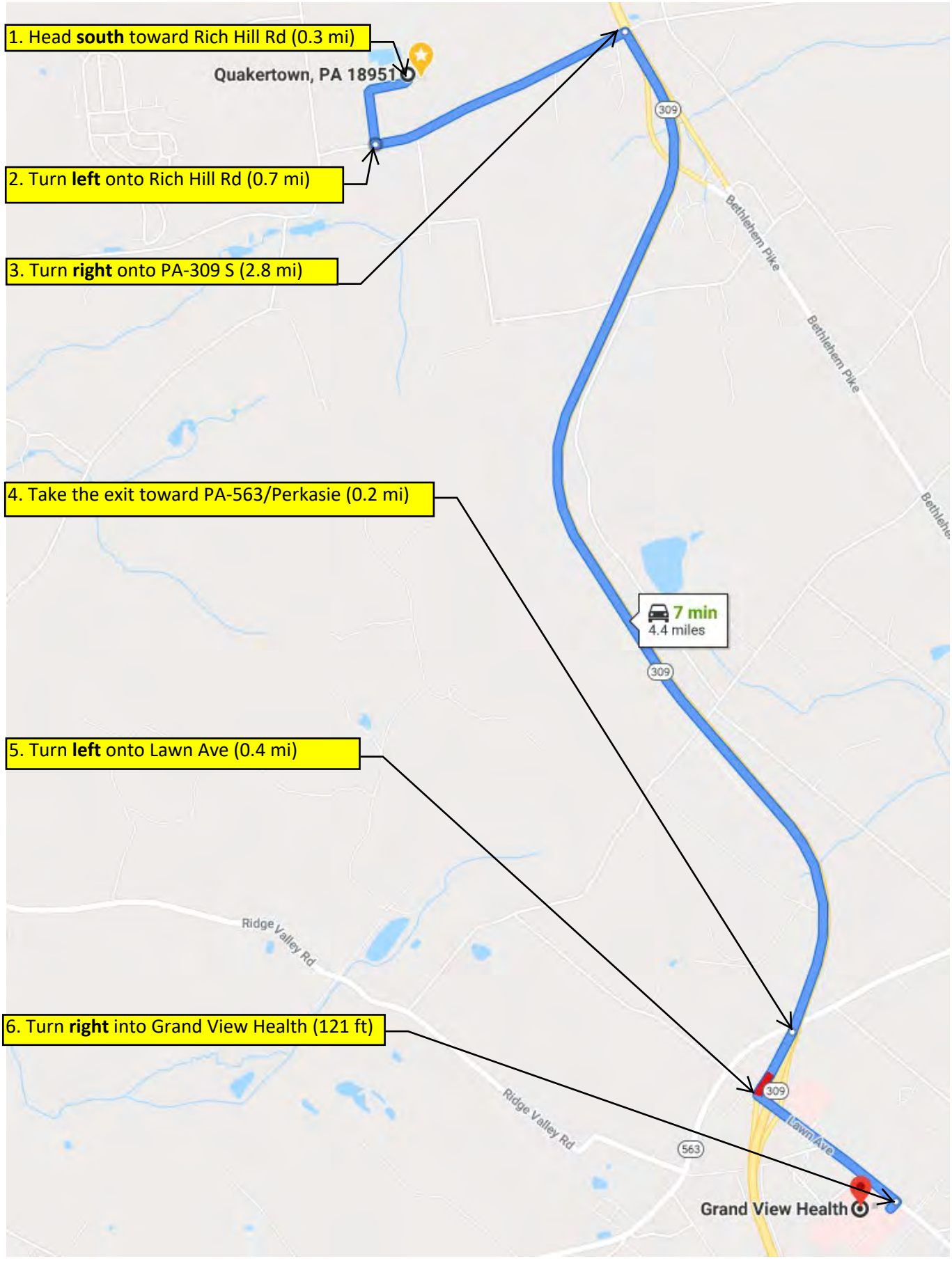
Drive: 4.4 Miles, 7 minutes



Google Map Data: 2020

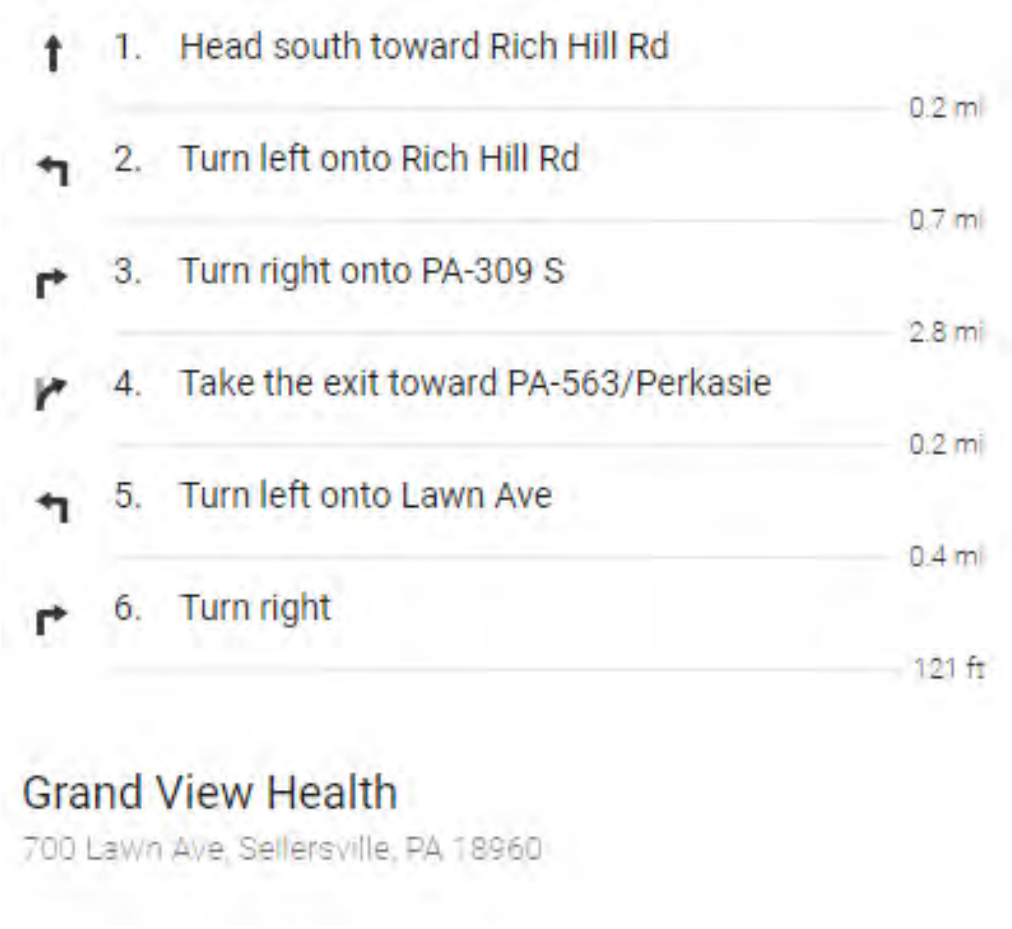
Driving Direction from Quakertown Compressor Station to Grand View Health

Drive: 4.4 Miles, 7 minutes



Google Map Data: 2020

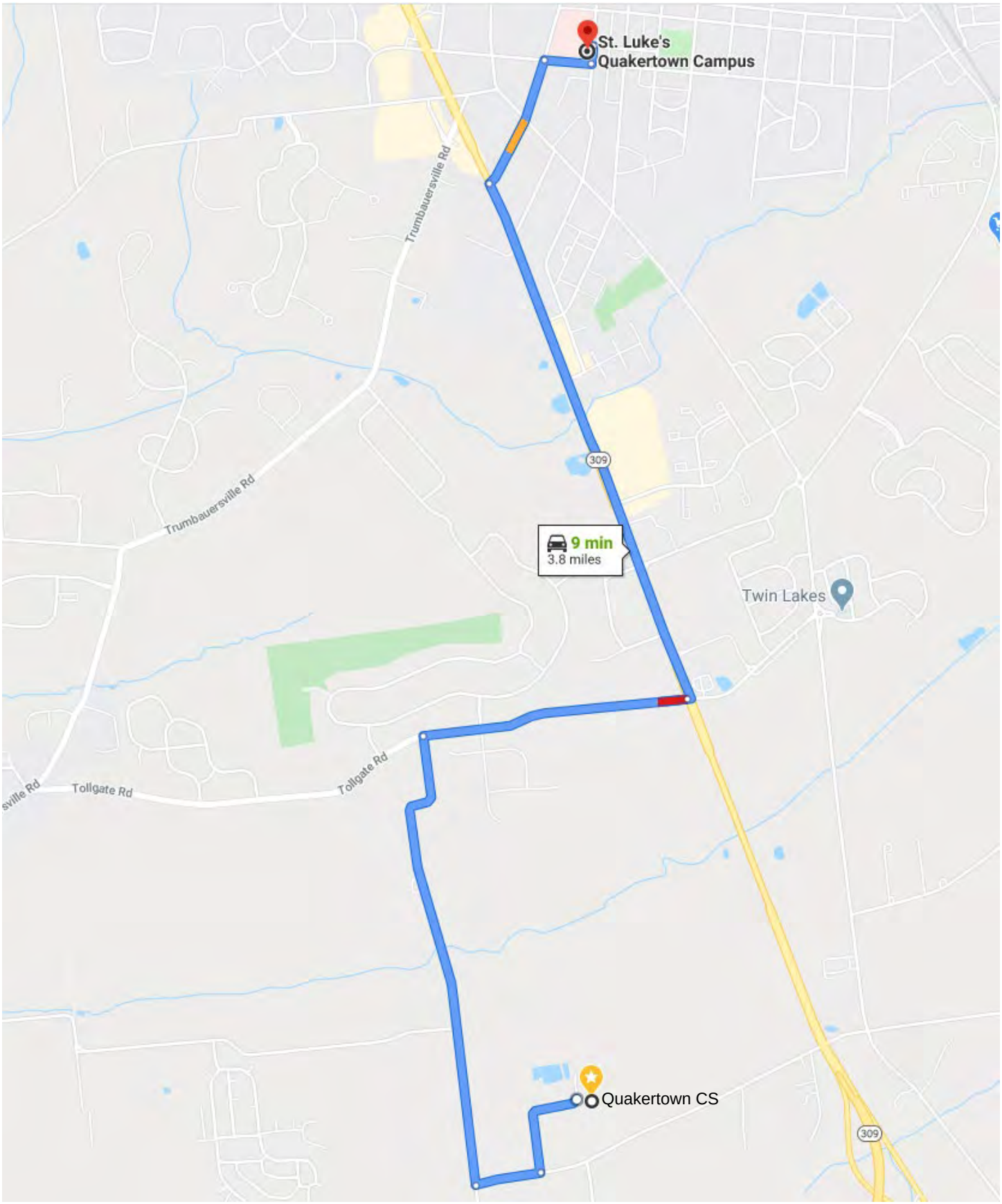
Driving Direction from Quakertown Compressor Station to Grand View Health



These directions are for planning purposes only. You may find that construction porojects, traffic, weather, or other events may cause conditions to differ from the map results, and you should plan your route accordingly. You must obey all signs or notices regarding your route.

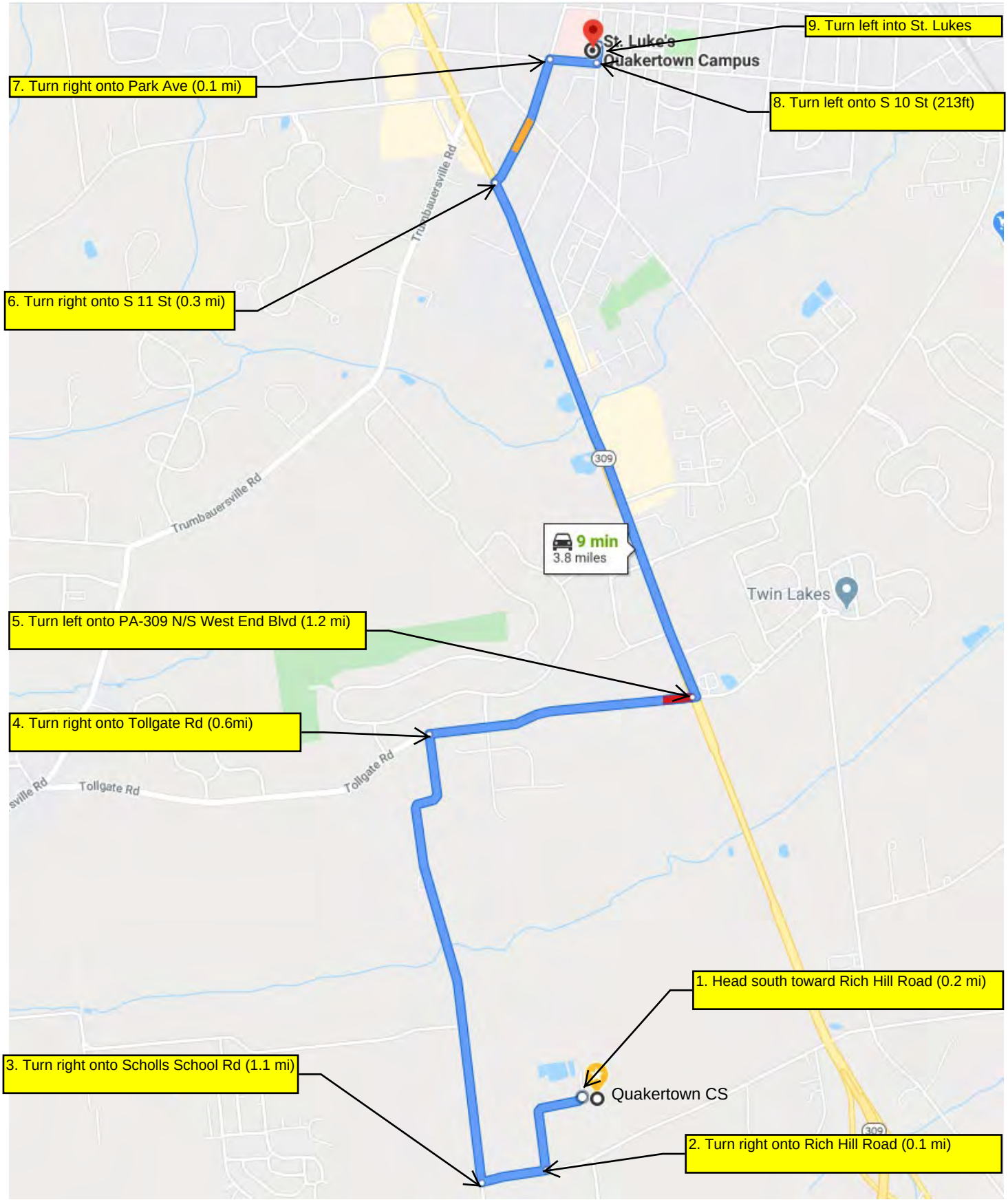
Driving Direction from Quakertown Compressor Station to St. Luke's Quakertown Campus Hospital

Drive: 3.8 Miles, 9 minutes

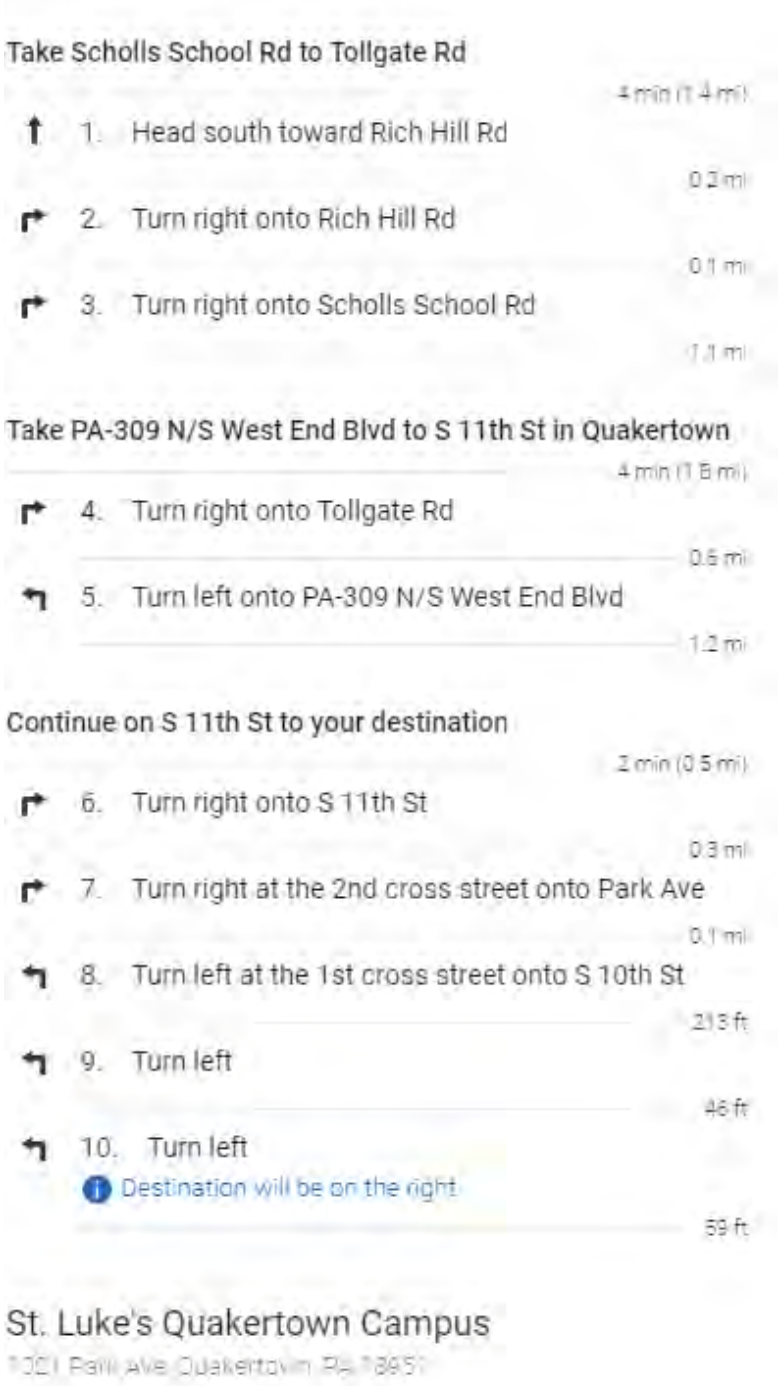


Driving Direction from Quakertown Compressor Station to St. Luke's Quakertown Campus Hospital

Drive: 3.8 Miles, 9 minutes



Driving Direction from Quakertown Compressor Station to St. Luke's Quakertown Campus Hospital



These directions are for planning purposes only. You may find that construction porojects, traffic, weather, or other events may cause conditions to differ from the map results, and you should plan your route accordingly. You must obey all signs or notices regarding your route.

Attachment 6

Post-Incident Report Template

POST-INCIDENT REPORT FORM

Location Details

Incident Date: _____ Incident Time: _____

Facility Name and Address: _____

_____

Person Responsible for Reporting: _____ Phone Number: _____

Incident Details

Type of Incident (i.e., Fire, Explosion, Release): _____

Main Activity at Time of Incident: _____

Machinery, Tools, Chemical and/or Materials Involved: _____

Quantity of Materials Involved: _____

Timeline of Events: _____

Additional Details

Description of Actual/Potential Hazards to Human Health or Environment: _____

Extent of Injuries (if any): _____

Description of Immediate Actions Taken: _____

Assessment of the Scope and Magnitude of the Problem: _____

POST-INCIDENT REPORT FORM

Agency Notification

Agency(s) Notified (e.g., Police, Fire, etc.) _____

_____

_____

_____

_____

Post-incident implementation schedule

Provide implementation schedule for further response activities, if necessary:

_____

_____

_____

_____

_____

_____

_____

POST-INCIDENT REPORT FORM

Internal Reporting Purposes Only

Root cause of incident: _____

Preventive action(s) to be taken to prevent recurrence: _____

Photo Documentation

Location: **Direction of photo:** **Description:** **Date:**	
Location: **Direction of photo:** **Description:** **Date:**	

POST-INCIDENT REPORT FORM

Photo Documentation Cont'd	
Location: Direction of photo: Description: Date:	
Location: Direction of photo: Description: Date:	
Location: Direction of photo: Description: Date:	
Location: Direction of photo: Description: Date:	

POST-INCIDENT REPORT FORM

Photo Documentation Cont'd	
Location: Direction of photo: Description: Date:	
Location: Direction of photo: Description: Date:	
Location: Direction of photo: Description: Date:	
Location: Direction of photo: Description: Date:	