

# PREPAREDNESS, PREVENTION, AND CONTINGENCY PLAN

May 2020

Prepared For:

## **Adelphia Gateway, LLC**

Ms. Ginger Richman  
1415 Wyckoff Road  
Wall, NJ 07719



**N|V|5**

200 South Park Road  
Suite 350  
Hollywood, FL 33021

Adelphia Gateway Project

## EXECUTIVE SUMMARY

This Preparedness, Prevention and Contingency Plan (PPC Plan) was prepared for Adelphia Gateway, LLC's (Adelphia) Adelphia Gateway Project (Project).

Several State of Pennsylvania and Federal regulatory programs have been developed to encourage the use of preventive approaches to deal with unwarranted releases of toxic, hazardous, or other pollutants to the environment from industrial activities. The Pennsylvania Department of Environmental Protection's (DEP) objective is to consolidate the similarities of the state and federal pollution incident prevention and emergency response programs into one overall program. As such, industrial and commercial installations that have the potential for causing accidental pollution of air, land or water, or the endangerment of public health and safety are required to develop and implement PPC Plans that encompass the other state and federal program requirements.

The information contained in this PPC Plan and format of the document have been prepared in accordance with the DEP's *Guidelines for the Development and Implementation of Environmental Emergency Response Plans* (dated August 2005). In addition, this Plan has been developed to satisfy the applicable requirements of applicable federal and state regulatory programs.

The Project does not involve a regulated storage tank facility with an aggregate aboveground storage capacity of more than 21,000 gallons; therefore, a Spill Prevention and Response Plan is not required.

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## 1.0 DESCRIPTION OF FACILITY

### 1.1 GENERAL PROJECT DESCRIPTION

This PPC Plan for Oil and Hazardous Substances is for construction activities associated with the Project, a Federal Energy Regulatory Commission (FERC)-regulated natural gas transmission Project. The Project is designed to increase available natural gas pipeline capacity to the Greater Philadelphia industrial region with the potential to serve additional markets in the Northeast while continuing to provide uninterrupted service to two existing power plants at the northern end of the system, the Lower Mount Bethel Power Plant and the Martins Creek Power Plant. The Project will achieve this objective by using and enhancing Interstate Energy Company's (IEC) existing natural gas and oil pipeline system located in eastern Pennsylvania (Existing System). The Existing System originates in Lower Chichester Township, Delaware County, Pennsylvania and travels north to its terminus in Lower Mount Bethel Township, Northampton County, Pennsylvania. The proposed Project terminates at IEC's existing Martins Creek Terminal. The Project will provide customers in the greater Philadelphia region with a needed, new source of clean, safe, low-cost natural gas supply.

The Project will use existing infrastructure to the greatest extent practicable and will also require the construction and operation of some new facilities. The Project consists of the following primary components:

- the existing approximately 4.4-mile, 20-inch outer diameter Mainline pipeline;
- the existing approximately 84-mile, 18-inch outer diameter Mainline pipeline;
- two new compressor stations (CS) (the Marcus Hook CS and the Quakertown CS);
- two new natural gas pipeline laterals, including an approximately 0.25-mile, 16-inch outer diameter pipeline lateral (the Parkway Lateral) and an approximately 4.2-mile, 16-inch outer diameter pipeline lateral (the Tilghman Lateral). The Parkway Lateral will be installed using traditional lay methods (i.e., trenching), and the Tilghman Lateral will be installed using both traditional lay and horizontal directional drill (HDD) methods;
- four existing meter stations that do not require any modifications;
- five new meter stations at receipt and delivery interconnects located along the 18-inch Mainline pipeline and the laterals;
- seven new blowdown assemblies located at existing mainline valves (MLV);
- two new tap valves;
- four pig launcher/receiver facilities;
- two new MLVs;
- new fencing at the existing Martins Creek Terminal; and
- the use of an existing disturbed site as a wareyard that will be used to store pipe and other construction materials and vehicles during construction of the two pipeline laterals.

A portion of the Parkway Lateral and its associated meter stations are located in New Castle County, Delaware. The remainder of the Project is located in eastern Pennsylvania in five counties: Delaware; Chester; Montgomery; Bucks; and Northampton. Appendix A has Project location maps. Appendix B contains detail maps for Project facilities.

This PPC Plan will be implemented as part of the construction project. Construction of the Project will require, but not be limited to, excavation equipment, equipment necessary to haul/transport supplies, pipe and pipeline handling equipment, pipe cutting and joining equipment, conventional boring equipment, grading equipment, service equipment, and various types of transportation equipment for personnel, tools, parts, supplies, fuel, lubricants, etc. Site conditions vary along the



Project’s construction areas; however, the entire workspace will be restored in accordance with an approved Erosion and Sedimentation Control Plan for the area that is disturbed.

## 1.2 DESCRIPTION OF EXISTING EMERGENCY RESPONSE PLANS AND ASSOCIATED PLANS

Adelphia developed an Unanticipated Discovery of Contamination (UDC) Plan and an HDD Inadvertent Return Contingency (IRC) Plan for the Project. The UDC Plan outlines practices to employ in the event of an unanticipated discovery of contamination in soil, groundwater, or sediment when excavating during construction and/or maintenance activities, as well as debris or waste materials deposited on the pipeline right-of-way at Project facilities. The IRC Plan establishes operational procedures and responsibilities for the prevention, containment, and cleanup of frac-outs associated with proposed HDD activities.

Adelphia also created Emergency Management Plans (EMPs) for each of Project’s aboveground facilities with the potential for a discharge to the environment. The EMPs are for use during emergencies 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. They provide facility-specific information including: Emergency Coordinator (EC) contact information; evacuation procedures and muster points; emergency notification procedures; a list of emergency and safety equipment available on-site; post-incident reporting procedures; and emergency preparedness training. EMPs will be posted and available to all site personnel at each applicable facility. The EMP for the Quakertown CS is provided as Appendix C to this PPC Plan<sup>1</sup>.

## 1.3 MATERIAL AND WASTE INVENTORY

Table 1-1 contains general information about the materials that could be located at Project sites during construction.

Table 1-1 Material Inventory

Material	Secondary Containment?	Spill Containment	Final Disposal
Diesel fuel	Yes	Absorbent pads and material.	Diesel fuel
Lubricating Oil	Yes	Absorbent pads and material. Shovel and sealable drum containers.	Off-spec material recycled or disposed consistent with applicable regulations. Used absorbents disposed as identified below.
Bentonite clay	No	Shovel and sealable drum containers.	Unused bags returned, if appropriate, or retained for use on another project.
Welding gases	No	NA	Unused gas returned, if appropriate, or retained for use on another project.

<sup>1</sup> The content for each of the Project facilities’ EMPs is largely the same with the exception of location-specific information (e.g., local emergency response contact information). Therefore, only the Quakertown CS is being provided as an attachment to this PPC Plan.

Material	Secondary Containment?	Spill Containment	Final Disposal
			Empty canisters depressurized and recycled or disposed consistent with applicable regulations.
Paint	No	Absorbent pads and material.	Unused portions managed and disposed of in accordance with applicable regulations. Used absorbents disposed as identified below.
Paint thinner	No	Absorbent pads and material.	Unused portions managed and disposed of in accordance with applicable regulations. Used absorbents disposed as identified below.
Used absorbents and miscellaneous wastes	No	Empty sealable drum containers or other appropriate disposal container	Transported to a contractor consolidation point and ultimately transported for disposal at an approved disposal facility. A Waste Acceptance Profile would be filed with the disposal facility. Recycling options may be considered when available.

## 1.4 POLLUTION INCIDENT HISTORY

NV5, LLC (NV5) conducted Phase I Environmental Site Assessments (ESA) at the proposed Marcus Hook CS, Quakertown CS, and Martins Creek Terminal on behalf of Adelphia in August 2017. The proposed Marcus Hook CS is sited within an approximately 6.9-acre property that was developed for use by IEC as an oil pump and heat station. NV5 performed its Phase I ESA of the Marcus Hook CS Site and identified five Historical Recognized Environmental Conditions (HRECs) during this assessment (see Table 1-2). NV5 did not identify any Recognized Environmental Conditions (RECs) or controlled RECs (CRECs) at the Site. During NV5's assessment, the site contained oil piping that was part of IEC's oil pump and heat station, and contaminated soil was identified in the area of the piping. As part of Adelphia's purchase agreement with IEC, existing oil piping and contaminated soils were removed prior to its purchase of the facility.

Table 1-2. Historical Recognized Environmental Conditions Identified at the Marcus Hook Compressor Station Site

Date of Occurrence	Identified Condition	Description	Comment/Status
2/6/1992	Oil release	An oil release affected storm water drainage and subsurface.	No evidence of staining or discharge via visual inspection. Soil and gravel were excavated and area cleaned/remediated.
6/30/1992	Oil release	Release of Therminol 55 heat transfer fluid affected storm water drainage system.	No evidence of staining or discharge via visual inspection. Contaminated soil was addressed.

Date of Occurrence	Identified Condition	Description	Comment/Status
4/5/1993	Oil release	Release of No. 2 fuel oil from adjacent site that was transferred to Marcus Hook CS via transfer pipe.	No evidence of staining or discharge via visual inspection. Contaminated soil and gravel were removed, area was remediated.
8/23/1993	Oil spray release	Surface spray of oil from muffler reported. Exact location unknown.	No evidence of staining or discharge via visual inspection.
5/28/2015	Monitoring well closure	Several groundwater monitoring wells installed at the site.	Not available.

Source: NV5, 2017

NV5's Phase I ESA at the proposed Quakertown CS Site did not identify any RECs, CRECs, or HRECs. NV5's Phase I ESA at the Martins Creek Terminal Site identified one REC involving a leak/oil staining located along the northeast section of the site. NV5 did not identify any other RECs, CRECs, or HRECs at the Martins Creek Site.

The Project will also be within one mile of several known EPA and/or DEP-regulated contaminated sites (see Table 1-3).

Table 1-3. Contaminated Sites within One Mile of the Adelpia Gateway Project

Site Name	Affected Media	Contaminants of Concern	Nearest Milepost	Approximate Distance – Direction from Project Facilities (feet) <sup>a</sup>
Latch Rosen Property / ConocoPhillips Trainer Refinery	Soil, Groundwater	Inorganics, Pesticides	TL 2.4	658 – west of Tilghman Lateral
Abbonizio Recycling Facility	Soil	Other Organics, PAH	TL 3.2	642 – southeast of Tilghman Lateral
Sunoco, LLC Marcus Hook Refinery	Soil, Groundwater	Inorganics, Fuel Oil No 2, Fuel Oil No 6	TL 0.8	295 – southeast of Tilghman Lateral
Marcus Hook Refinery Auto Lab	Soil, Groundwater	Not provided	TL 0.8	690 – southeast of Tilghman Lateral
Edwards Residence	Soil	Not provided	TL 1.3	715 – southeast of Tilghman Lateral
PECO Parking Lot, City Of Chester Greenspace, and Riverwalk	Soil	Chlorinated Solvents, PAH	TL 4.2	499 – southeast of Tilghman Lateral
Abm Wade Site	Soil, Groundwater	Not provided	TL 4.2	238 – southwest of Tilghman Lateral
Congoleum Corporation Plant 3	Soil, Groundwater	Heavy metals	TL 1.5	Within Tilghman Lateral alignment or



Site Name	Affected Media	Contaminants of Concern	Nearest Milepost	Approximate Distance – Direction from Project Facilities (feet) <sup>a</sup>
				workspace
<b>Metro Container Corporation Superfund Site</b>	Soil, Groundwater	PCB, inorganics, PAH, VOC	TL 2.6	Within Tilghman Lateral Alignment or Workspace
<b>Monroe Energy Site</b>	Soil, Groundwater	Not available	TL 2.7	Within Tilghman Lateral Alignment or Workspace
<b>Foote Mineral Company Superfund Site</b>	Soil, Groundwater	Radioactive soils, tailings.	17.9	1,584 – north of MLV 2
<b>Johnson Mathey-West Whiteland CIMC Site</b>	Soil, Groundwater	Not available	17.9	3,168 – northwest of MLV 2
<sup>a</sup> Distances are based on available information on site location. PAH = polycyclic aromatic hydrocarbons PCB = polychlorinated biphenyls VOC = volatile organic compound Source: FERC 2019				

**1.5 IMPLEMENTATION SCHEDULE FOR PLAN ELEMENTS NOT CURRENTLY IN PLACE**

Safety datasheets will be provided by the contractor and incorporated as an appendix to this PPC Plan prior to construction.

**2.0 PPC PLAN IMPLEMENTATION**

**2.1 PURPOSE AND IMPLEMENTATION OF A PPC PLAN**

Adelphia will implement this PPC Plan to minimize and abate hazards to human health and the environment from fire, explosion, emission or discharge of pollutants to air, soil, surface water, or groundwater. This plan was prepared to satisfy the requirements set forth in 25 Pa. Code Section 78.

This PPC Plan describes the actions that Adelphia and/or contractor personnel will take to comply with 25 Pa. Code Section 78.51 and 265a, in response to fire, explosion, emissions or discharges of hazardous waste or hazardous waste constituents to air, soil, surface water, or groundwater.

Any hazardous waste produced during construction will be in quantities small enough to categorize Adelphia as a ‘very small quantity generator’. Due to the minimal amount of hazardous waste that will be generated, Adelphia will not make formal contractual arrangements for hazardous waste management and disposal.

## 2.2 PLAN REVISIONS

Adelphia is the administrator responsible for updating, maintaining, and implementing this PPC Plan. This PPC Plan will be periodically reviewed and amended, if necessary, whenever:

- applicable department regulations are revised;
- the Plan fails in an emergency;
- the list of ECs changes; and/or
- construction, operation, maintenance, or other circumstances change in a manner that materially increases the potential for fires, explosions, or releases of toxic or hazardous constituents, or that changes the response necessary in an emergency.

## 2.3 LIST OF EMERGENCY COORDINATORS

At least one employee, either on the construction site or on-call, will have the responsibility for coordinating emergency response measures. All people qualified to act as ECs will be thoroughly familiar with this PPC Plan, Project EMPs, site operations and activities, the location and characteristics of materials and wastes handled, the location of the site's records, and the layout of the sites. ECs have the authority to commit the resources necessary to carry out this PPC Plan and for coordinating emergency response measures. In the event of a spill or release, one of the ECs will be immediately notified. Table 2-1 lists the ECs for the Project.

Table 2-1. Emergency Coordinators for the Adelphia Gateway Project

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

## 2.4 DUTIES AND RESPONSIBILITIES OF THE EMERGENCY COORDINATOR

It is the responsibility of the EC during an imminent or actual emergency to identify the problem, assess the health and environmental hazards, and take all reasonable measures to stabilize the situation. The EC will ensure that alarm systems are activated immediately, evacuations are ordered (if necessary) and the appropriate emergency response agencies are notified (if necessary). Additionally, the EC will ensure that a follow-up investigation and any post-response activities (e.g., treatment, storage and disposal of residues and contaminated soil; decontamination and maintenance of emergency equipment; and submission of any reports) are conducted. The EC has the authority to delegate his/her responsibilities to appropriate site personnel, as necessary.

If the EC determines that the site has had an incident (spill, fire, or explosion) that could threaten human health or the environment and if evacuation of local areas may be advisable, he/she will immediately notify the applicable local authorities (police, fire, etc.) and provide them with the following information:

- name of the person reporting the incident;
- location of the incident;
- telephone number where the person reporting the incident can be reached;

- date, time, and location of the incident;
- a brief description of the incident, nature of the materials involved, extent of any injuries, and possible hazards to human health or the environment;
- the estimated quantity of the materials involved; and
- the extent of contamination of land, water, or air, if known.

If a release occurs from a storage tank which enters a water supply or which threatens the water supply of downstream users, the ERC must immediately notify the following agencies:

- the appropriate County Emergency Management Agency (EMA);
- the Pennsylvania EMA at (717) 651-2001; and
- the DEP at (800) 541-2050.

If appropriate, the EC may assist the EMAs in notifying the downstream water users. The priorities for notification will be by closest proximity to the release site.

If spills or discharges of a Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) hazardous substance in greater than reportable quantities has occurred, the EC must notify the DEP at (800) 541-2050 and the National Response Center at (800) 424-8802 and report the above information. For an offsite release (spill or discharge) of a reportable quantity of a CERCLA hazardous substance or a Superfund Amendments and Reauthorization Act Extremely Hazardous Substance, the EC must immediately notify the National Response Center at (800) 424-8802 and report the above information.

Within 15 days after the incident, a written report on the incident must be submitted to the DEP and the U.S. Environmental Protection Agency. The report must include the following information:

- name, address, and telephone number of the individual filing the report;
- name, address, and telephone number of the installation;
- date, time, and location of the incident;
- a brief description of the circumstances causing the incident;
- description and estimated quantity by weight or volume of materials or wastes involved;
- an assessment of any contamination of land, water, or air that has occurred due to the incident;
- estimated quantity and disposition of recovered materials or wastes that resulted from the incident; and
- a description of what actions the installation intends to take to prevent a similar occurrence in the future.

The report must be submitted to the following addresses:

#### **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*

Additional information about the EC's duties is provided in the EMPs (see Appendix C).

## **2.5 CHAIN OF COMMAND**

In the event of a spill or other emergency, site personnel are required to report the incident to the EC in charge at the scene of the incident. The EC has the authority to delegate his/her subsequent responsibilities to appropriate site personnel, as necessary. 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 (and/or appointed staff) 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.

## **3.0 SPILL AND LEAK PREVENTION AND RESPONSE**

### **3.1 PRE-RELEASE PLANNING**

All employees will be made aware of the PPC Plan, applicable EMPs, the IRC Plan, and the UDC Plan and how they are to be implemented in the event of an emergency. Adelpia will hold annual training sessions to review emergency response protocols (see Section 3.8).

Employees will adhere to the following best management practices:

- Special care will be taken when filling fuel tanks on mobile equipment to ensure that fuel is not lost through product transfer;
- Regulated materials will be stored in a manner that minimizes their potential contact with stormwater;
- Where possible or practicable, regulated materials shall be provided with secondary containment, or other measures, to contain potential spills/leaks;
- Absorbent and spill control materials shall be maintained on-site for emergency use;

- Aboveground storage tanks will be secured so that they cannot fall; and
- Aboveground storage tanks will be stored in areas where they will not be impacted by construction equipment.

### 3.2 MATERIAL COMPATIBILITY

All materials used for installation of the pipeline will be designed for the intended applications and working environments. Safety datasheets indicating compatibility issues will be available on-site during construction and operations.

### 3.3 INSPECTION PROGRAM

Adelphia's Environmental, Health, and Safety (EHS) Manager will ensure that all work areas are visually inspected on a monthly basis for leaks or other conditions that could lead to spills or emergency situations. Typical inspections will include, but not necessarily be limited to, inspections of the following areas/items:

- pipes, pumps, valves, and fittings for leaks;
- all mobile equipment used onsite for leaks and damage;
- tanks for corrosion or physical damage;
- tank support structure and foundations for any deterioration or damage;
- chemical material storage for any evidence of damage/leakage or unsuitable storage conditions (i.e., extreme heat);
- evidence of any foreign material in site drainage ditches or erosion controls;
- good housekeeping practices;
- damage to shipping containers;
- liquid levels in tanks, and
- quality of site runoff.

An inspection form that will be used by Adelphia staff is provided in Appendix D. Completed inspection forms will be kept on-site and provided electronically to the EHS Manager's direct supervisor.

### 3.4 PREVENTATIVE MAINTENANCE

The results of the inspection program will be used to initiate required preventative procedures to repair and maintain the equipment and work areas. In addition, measures will be implemented to minimize degradation and repair any hazardous condition that may occur. The preventative maintenance program will include systems inspections and calibrations as recommended by equipment manufacturers and good operating practices. Adjustments, repairs, and replacements of defective parts will be included in the preventative maintenance program. Record keeping for all repairs and calibrations will be maintained by site and management personnel.

### 3.5 HOUSEKEEPING PROGRAM

General housekeeping tasks associated with this PPC Plan include:

- orderly and safe storage of chemicals, supplies and parts;
- prompt removal of small spills to prevent discharge from site and proper disposal of spilled material; and
- trash will be picked up and contained in an approved container for proper disposal.



## 3.6 SECURITY

Access to Adelphia's worksites may be controlled by signs placed at the entrances from the main roads. Additional measures such as a gate would be used if needed. All chemicals and fluids will be stored at a secure contractor site. Any temporary storage of oils or hazardous wastes, other than those used and recycled by the Contractor's radiographic inspection crew, will be secured in a locked location with lighting at the approved contractor yard or Project facility site.

## 3.7 EXTERNAL FACTORS

Weather-related factors such as inclement weather may require evacuation of the work area or limit access to a worksite for a short period of time. However, all materials and equipment will be secured prior to leaving the site, and there should not be any increased risk of an event.

## 3.8 EMPLOYEE TRAINING

Annual emergency response training will be provided to site personnel to ensure that they can respond effectively to an emergency by familiarizing them with emergency procedures and emergency equipment including the following, where applicable:

- procedures for using, inspecting, repairing and replacing emergency and containment equipment;
- key parameters for communications and alarm procedures in the event of an incident;
- proper response to fires and explosions;
- site evacuation procedures; and
- shutdown of operations.

Additional details are provided in Project EMPs (see Appendix C).

## 4.0 COUNTERMEASURES

### 4.1 GENERAL SPILL CLEANUP PROCEDURES:

Spill cleanup generally involves three steps: containment, removal, and disposal. In the event of a spill, it is very important that the material be contained to the maximum extent possible as quickly as possible in order to minimize the effect of the spill and the cost of cleanup. Once the spill is contained, the spilled material and contaminated material must be collected and physically removed from the area. In some cases, with certain materials, it may be possible to neutralize a spilled material in place without removal. Finally, the spilled material and contaminated soil, cleanup material, etc., must be disposed of properly.

### 4.2 SPECIFIC SPILL CLEANUP PROCEDURES

If potentially contaminated soils are identified by visual or olfactory methods, work would be stopped in the area of suspected contamination, and the EC would be notified.

#### **Petroleum and Petroleum-Related Materials**

In dealing with a petroleum spill, the immediate response action is to attempt to eliminate the source of the spill as soon as possible. In the event of an accidental spill, emergency measures will be implemented by Adelphia to isolate the spilled material and prevent the release from entering surface water or groundwater. Berms may be constructed to contain the spill, and/or excavation equipment may be used to promptly remove impacted soils, concrete, or asphalt. Stormwater

collection structures would be either blocked or pumped, if appropriate, to prevent the release to surface water.

Soil that is impacted as a result of an accidental spill or release would be containerized for subsequent disposal. The typical cleanup procedure for spilled oil is as follows:

1. Remove sources of ignition.
2. Contain the spill using whatever equipment and material are available. Petroleum captured within secondary containment should be recycled to the extent possible. In water, booms should be used to limit the spread of oil along the surface. On land, absorbent materials such as Oil-Dri, straw, sawdust, or soil should be used to soak up any free or flowing oil and limit its spread. The most important thing is to act quickly to limit the extent of the spill.
3. Remove the petroleum-soaked materials using the most effective means, whether it is by hand using shovels or heavy earth-moving equipment. Caution must be exercised in using construction equipment in and around streams to minimize the disturbance to the watercourse. It may be necessary to provide clean fill to reconstruct the affected areas after removal of the petroleum-contaminated soils.
4. The petroleum-contaminated material removed in the cleanup operation must be disposed of properly. With the approval of DEP, the contaminated material should be hauled to a waste disposal facility that is authorized by permit to accept this type of waste. Confirmatory sampling and laboratory analysis should be conducted in accordance with DEP guidelines.

#### 4.3 COUNTERMEASURES TO BE TAKEN BY CONTRACTORS

Adelphia will use Lewis Environmental as its emergency response contractor(s) to address emergency responses beyond the capabilities of the construction contractor and Adelphia personnel. Adelphia will provide Lewis Environmental with copies of its PPC and EMPs.

#### 4.4 INTERNAL AND EXTERNAL COMMUNICATIONS AND ALARM SYSTEM

Site personnel will have access to mobile communications equipment (e.g., cellular telephones) that will enable communications with management or outside emergency services such as fire departments or police. Fire eyes and alarm systems will be installed at aboveground facilities.

#### 4.5 EVACUATION PLAN FOR INSTALLATION PERSONNEL

Personnel that encounter an incident or event while working on the Project would immediately call the EC to report the incident. Additionally, emergency services would be notified if necessary. All other onsite employees and contractors would be notified and any people potentially affected by the incident would be evacuated from the area. Finally, Adelphia would take steps to account for the total number of people present at the worksite. All persons would remain grouped together at a safe distance from the site until emergency services or the EC arrives.

The following key points would be adhered to during an evacuation:

- All work not associated with emergency containment would be stopped;
- The immediate area would be cleared of all non-emergency response personnel. All others would remain at the gathering point;
- The EC's instructions would be followed;

- All personnel would be required to remain with the group until instructed otherwise by the EC or other Adelphia representatives;
- Ingress and egress would be facilitated for all emergency vehicles by Adelphia personnel; and,
- Work would not resume at the site until proper notification has been provided by Adelphia personnel.

Additional details about evacuation measures are provided in the EMPs (see Attachment C).

## 4.6 EMERGENCY EQUIPMENT AVAILABLE FOR RESPONSE

Adelphia’s contractors will be required to stockpile fire extinguishers, containment booms, absorbent pads, and portable spill containment kits and containers at all Project work locations.

Equipment will be tested and maintained, as necessary, to assure its proper operation in time of emergency. After an emergency, equipment would be decontaminated, cleaned, and re-fit for its intended use before normal operations resume. Additional information about the types and locations of emergency equipment will be provided in the EMPs.

## 5.0 EMERGENCY SPILL CONTROL NETWORK

### 5.1 ARRANGEMENTS WITH LOCAL EMERGENCY RESPONSE AGENCIES AND HOSPITALS

Adelphia will provide local response agencies and hospitals copies of applicable EMPs prior to construction. In addition, at least once a year, Adelphia will request local emergency responders to visit applicable facilities in order to participate in drills, and to review facility equipment and layouts and the hazards associated with activities at the facility.

### 5.2 NOTIFICATION LIST

The EC or his/her appointee would call the local emergency response teams provided in Table 5-1, should their assistance be required. Phone numbers for County EMAs and local hospitals are provided in the Project’s EMPs.

Table 5-1. Emergency Response Notification List

Agency/Party	Phone Number
Police	911
Fire	911
Ambulance	911
Poison Control Center	(800) 222-1222
PADEP	(800) 541-0250
National Response Center <sup>a</sup>	(800) 424-8802
Spill Contractors	Lewis Environmental (800) 258-5585
OSHA <sup>b</sup>	(800) 321-6742

<sup>a</sup> 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.

<sup>b</sup> Notify OSHA within eight hours for a single fatality or hospitalization of three or more persons.

### 5.3 DOWNSTREAM NOTIFICATION REQUIREMENT FOR STORAGE TANKS

Downstream notification requirements for storage tanks are not required for this Project as it does not involve a storage tank facility with aggregate aboveground storage of more than 21,000 gallons of regulated substances.

## 6.0 REFERENCES

Federal Energy Regulatory Commission (FERC). 2019. Adelpia Gateway Project. Environmental Assessment. Docket Nos. CP18-46-000 and CP18-46-001. January 2019.

NV5, LLC (NV5). 2017. Revised Phase I Environmental Site Assessment. Marcus Hook Pump Station. October 2017.



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