

Preparedness, Prevention, and Contingency Plan for Construction Activities

Shell Pipeline Company LP



Falcon Ethane Pipeline System Allegheny, Beaver and Washington Counties, Pennsylvania

AECOM Project #60536988
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1.0 GENERAL DESCRIPTION OF THE OPERATION

Shell Pipeline Company LP (SPLC) is involved in the installation of pipelines for the transportation of natural gas from its production fields to larger transmission pipelines (including all of the associated work that is required for the clearing of rights-of-way (ROWs), control of erosion and sediment, control of post-construction stormwater runoff, trench excavation work, pipeline hydrostatic testing, proper backfilling of trenches, installation of access roads, and restoration of the ROWs after completion of construction activities).

After approval, this Preparedness, Prevention, and Contingency (PPC) Plan will be implemented at the Falcon Ethane Pipeline System (Project) construction site in Allegheny, Beaver and Washington Counties, Pennsylvania. The Project site will contain excavation equipment, horizontal directional drilling (HDD) equipment, haulage equipment for supplies, pipe and pipeline handling equipment, pipe cutting and joining equipment, service equipment and various types of transportation equipment for personnel, tools, parts, supplies, fuel, lubricants, etc.

2.0 DESCRIPTION OF EMERGENCY RESPONSE PLAN

The purpose of this PPC Plan is to ensure adequate preparedness for rapid and appropriate response to an event that could affect the safety and well-being of any personnel that are located on-site such as SPLC employees, any worksite contractor, or members of the general public. Additionally, the PPC Plan provides for a course of action to protect the local environment and any assets from an event that interrupts the normal operation at the site and could result in a threat to health and/or the environment if not properly addressed. This PPC Plan will be revised as required for addition of new processes or chemicals at the worksite or if there is a major modification to the worksite activities, emergency response equipment or resources, or responsible personnel.

Copies of the PPC Plan will be located at the field office and the worksite in an appropriate place for the use of Emergency Response Coordinators. A cover page will be provided for the site specific copy which will identify the name of the Project site and local emergency contact numbers.

3.0 ORGANIZATIONAL STRUCTURE FOR DEVELOPING, IMPLEMENTING AND MAINTAINING THE PPC PLAN

3.1 MAIN OFFICE

Shell Pipeline Company LP
150 North Dairy Ashford Road
Houston TX 77079

3.2 EMERGENCY RESPONSE COORDINATOR

Name: Scott Adams
Title: Construction Manager
Office Phone Number: 713.870.5406

Secondary Contact:

Name: Mary Gerschefski

Title: Project HSSE Manager

Office Phone Number: 281.799.5385

3.3 ROLES AND RESPONSIBILITIES

All Staff – Upon becoming aware of a release, immediately advises coworkers if there is any potential or imminent danger to human health and safety. Reports any observed release to the Construction Manager and Environmental Inspector as soon as it is safe to do so.

Construction Manager (CM) – First, ensures safety of all staff. Contacts emergency medical services and other first responders as needed. Implements action items in the specific Project PPC Plan and notifies the Compliance Specialist of a release.

Environmental Inspector (EI) – Either observes or is notified of a release. Visits the release site and documents observations (written report and photographs) regarding the time of the release, the significance, size, characteristics and nature of the release, any resource impacts observed and the measures being taken to respond to the release. Also, notifies the Compliance Specialist of the release.

- Ensures that all Project construction activities, environmental mitigation measures, and operations are conducted in strict compliance with federal, state, and local environmental health and safety regulations and environmental permits.
- Coordinating on-site inspections to confirm the continued proper use, storage, and disposal of on-site construction materials and containers and to ensure that procedures are in place to minimize the potential for pollutants to escape into the environment.
- Providing pollution prevention briefings to the construction contractors at intervals frequent enough to assure adequate understanding of the proper management practices as documented in this plan.
- Handling emergency situations such as employee accidents, fires, and releases of hazardous substances stored at the Project site during construction. The Project Supervisor will coordinate with local fire officials regarding on-site fire safety and emergency response procedures, as required.

Compliance Specialist (CS) – notifies SPLC HSSE, **(281.799.5385)** of the release. If the volume of the release is greater than one gallon, the CS notifies the appropriate regulatory agency via telephone. If voice mail is encountered, the CS should leave a voice mail, but continue to call until human contact is made.

4.0 MATERIAL AND WASTE INVENTORY

Information in this section is used to evaluate the prevention, containment, mitigation, cleanup, and disposal measures which would be used in the event of a spill, discharge, explosion, or fire. Installation of pipelines is accomplished by use of mobile, heavy machinery, including, but not limited to:

- Dozers;
- Tracked Excavators;
- Refueling Vehicles;
- Material delivery/hauling vehicles;
- Dump trucks; and
- Stringing equipment.

Typical material storage at a pipeline construction site includes diesel fuel, hydraulic oil, bentonite clay for HDD installation methods, and welding gases (oxygen and acetylene). There are no materials known to be used, stored or disposed of at the site that are considered hazardous materials under the Resource Conservation and Recovery Act (RCRA) regulations; therefore, a discharge of hazardous materials is not considered likely. As new materials are used onsite, their pollution potential will be evaluated.

Construction at the Project will require use of lubricating oils, aerosol spray lubricants, paint, and gasoline/diesel fuels and solvents. A mobile fueling truck will be used to transport gasoline/diesel fuels. All other oils and/or chemicals are expected to be delivered in 5-gallon steel containers or 55-gallon drums. Materials will be stored on pallets, located inside one or more secondary containment areas, as needed. Table 1 lists typical construction materials that will be used or stored on site.

Table 1 – List of Typical Materials that will be Used/Stored during Construction

Waste	RCRA Status	Final Disposal
Spill Residue (soil, gravel)	Incident Dependent	Evaluated on a case-by-case basis. May be disposed of at an approved disposal facility
Used Absorbents	Non-Exempt	Transported to a SPLC or contractor consolidation point, drained, and ultimately transported for disposal at an approved disposal facility. A Waste Acceptance Profile will be filed with the disposal facility. Recycling options may be considered when available.
Diesel	NA	Off-spec material is recycled or disposed consistent with applicable regulations.
Lube Oil	NA	Off-spec material is recycled or disposed consistent with applicable regulations.

5.0 SPILL AND LEAK PREVENTION AND RESPONSE

All employees at the site will receive training regarding the implementation of the PPC Plan. The training will address the following items:

- Incident Response Organization;
- Roles and Responsibilities;
- Notification Procedures;
- Evacuation Procedures; and
- Incidental Chemical Spill response.

5.1 INCIDENT RESPONSE

Spill containment and clean up equipment and supplies will be located at the site. Additional equipment and supplies will be available locally when the need arises. In the event that the incident is associated with an Inadvertent Return caused by the construction of a crossing using horizontal directional drilling techniques, All Staff shall refer to the Inadvertent Returns from HDD: Assessment, Preparedness, Prevention and Response Plan, provided under separate cover.

Material Safety Data Sheets (MSDS) sheets will be maintained by the site supervisor at the main field office and contractors will be required to provide MSDS sheets for all materials that they are required to provide. They will have the sheets in their possession while working on-site.

5.2 UNANTICIPATED DISCOVER OF CONTAMINATION

In the event, during right of way clearing or excavation of the pipeline trench, materials are disturbed or unearthed that could potentially contain contaminants, All Staff shall refer to the Unanticipated Discovery of Contamination Plan provided in Appendix B. This plan provides guidance on identification, testing and disposal of discovered contaminants during construction that are not associated with standard construction activities.

6.0 MATERIAL COMPATIBILITY

All containment devices will be appropriate to the materials they contain. The following practices will be implemented during construction:

- Petroleum
Petroleum products that are not in vehicles will be stored in tightly sealed containers that are clearly labeled. Drip pans will be used during equipment fueling and a supply of absorbent pads will be maintained on hand and utilized, as required.
- Paints
All paints will be kept tightly sealed and neatly stored out of conveyance channels when not in use. Excess paint will be disposed of according to manufacturers' instructions and Pennsylvania Department of Environmental Protection (PaDEP) and local regulations.

- Fertilizers and Dry Products
For materials that must be kept dry (fertilizers, dry ingredients, etc.), indoor storage, temporary shelters, storage trailers, tarpaulins, and other means will be employed.

7.0 INSPECTION AND MONITORING PROGRAM

All sites will be inspected and routinely monitored for leaks or other conditions that could lead to spills or emergency situations. Typical inspections will include the following areas/items:

- Pipes, pumps, valves, and fittings for leaks;
- All mobile equipment used on site 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 or leakage;
- Evidence of any foreign material in site drainage ditches or erosion controls;
- Good housekeeping practices will be observed;
- Damage to shipping containers will be inspected, noted and addressed as required;
- Leaks, seeps or other problems will be noted and corrected as required; and
- Routine monitoring will be performed to determine the general physical condition of the entire site including liquid levels in tanks, quality of site runoff, quality of any waste to be disposed of etc.

Monitoring will be used to initiate a warning of need for immediate corrective actions to prevent a spill or other emergency condition.

8.0 PREVENTATIVE MAINTENANCE

Construction materials will be stored in a manner that minimizes exposure to precipitation and runoff, where appropriate, or otherwise to prevent the contamination of stormwater. For pollutant materials that must be kept dry (fertilizers, dry ingredients, etc.), indoor storage, temporary shelters, storage trailers, tarpaulins, and other means will be employed. Building component materials that are normally allowed to be exposed to precipitation while being stored will be placed in upland areas away from all storm water conveyances and will be stored and in a manner that will not concentrate runoff. Finally, stockpiles of earthen materials will be stored away from storm water conveyance areas and in a manner that prevents erosion and transport of sediments.

Potentially hazardous wastes (i.e., used motor oils) will be separated from other waste through segregation of storage areas and proper labeling of containers. All hazardous waste will be removed from the site by licensed contractors in accordance with all applicable regulatory requirements and disposed at an approved/licensed facility.

9.0 HOUSEKEEPING PROGRAM

The following housekeeping practices will be followed:

- All material stored on site will be stored in a neat, orderly manner in appropriate containers and, if reasonably possible, under a roof or other enclosure.
- Products will be kept in their original containers with the original manufacturer's label, unless the containers are not re-sealable.
- Original labels and MSDSs will be retained for the period of time that the product is being utilized on site in accordance with all applicable Occupational Safety and Health Administration regulations (29 CFR 1926.33).
- Manufacturer's recommendations for proper use and disposal will be followed.
- An EI will conduct routine inspections to confirm the continued proper use, storage and disposal of onsite materials.
- Substances will not be mixed unless necessary for the construction activity and as recommended by the manufacturer.
- Whenever possible, all of a product in a container will be used before proper disposal of the container.
- Mechanical maintenance (mowing, hand cutting, etc.) will be scheduled as needed within the station during construction so as to facilitate visual inspections and enable the access for maintenance and emergency equipment.
- All employees and/or other handlers of hazardous materials will be properly trained and instructed on the proper reporting and handling requirements.
- All equipment will be maintained in good operating condition and inspected on a regular basis for leaks.
- All equipment will be refueled with extreme care, under continual surveillance and away from Waters of the Commonwealth.
- All equipment operating on the site will have sufficient spill containment equipment on board to provide for prompt cleanup in the event of a release.

The Emergency Response Coordinator will oversee and direct site personnel in the performance of their responsibilities for addressing the emergency situation. Immediately following an emergency, the Emergency Response Coordinator (with PaDEP approval) must provide for treating, storing, or disposing residues, contaminated soil, etc., from an emission, discharge, fire, or explosion at the construction site. The Emergency Response Coordinator must ensure that in the affected areas of the facility, no material incompatible with the emitted or discharged residues is processed, stored, treated, or disposed until cleanup procedures are completed and that all emergency equipment utilized in implementation of the PPC Plan is cleaned and fit for its intended use before operations are resumed. SPLC will notify the Department and the appropriate State or local authorities that the facility is in compliance before operations are resumed in the affected areas of the facility. SPLC will note the time, date and details of an incident that requires implementing the PPC Plan.

Within 15 days after the incident, SPLC will submit a written report on the incident to PaDEP and the United States Environmental Protection Agency (USEPA) regional administrator. The report must be submitted to:

- **Director - Bureau of Water Quality Management**
PaDEP
909 Elmerton Avenue
Harrisburg, Pennsylvania 17110

- **Regional Administrator**
USEPA
Region III
1650 Arch Street
Philadelphia, Pennsylvania 19103

- **Director - PaDEP Southwest Regional Office**
PaDEP
400 Waterfront Drive
Pittsburgh, PA 15222-4745

The report should 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, type, and location of incident;
- A brief description of the circumstances causing the incident;
- Description and estimated quantity (by weight) of materials or wastes involved;
- The extent of injuries, if any;
- An assessment of actual or potential threat to human health or the environment and assessment of contamination of land, water, or air, where applicable;

- Estimated quantity and disposition of recovered materials or wastes that resulted from the incident; and
- A description of what actions SPLC intends to take to prevent a similar occurrence in the future.

14.0 COUNTERMEASURES TO BE UNDERTAKEN BY SPLC

The following sections present general spill response practices to be implemented at the Project site, as appropriate.

- **Spill Clean-Up Procedures – General**

Spill clean-up 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 in order to minimize the effect of the spill and the cost of clean-up. NOTE: ANY SHEEN ON A WATERBODY (STREAM, RIVER, WETLAND) IS A REPORTABLE RELEASE. 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, clean-up material, etc., must be disposed of properly.

- **Spill Clean-Up Procedures – Specific**

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 SPLC 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 will 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 will be containerized for subsequent disposal. The typical clean-up procedure for the spilled oil is as follows:

- Remove sources of ignition.
- Immediate action is to be taken to contain and limit the extent of 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.
- 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 Waters of the Commonwealth to minimize the disturbance. It may be necessary to provide clean fill to reconstruct the affected areas after removal of the petroleum-contaminated soils.

- The petroleum-contaminated material removed in the clean-up operation must be disposed of properly. With the approval of PaDEP, 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 PaDEP guidelines.

15.0 COUNTERMEASURES TO BE UNDERTAKEN BY CONTRACTORS

SPLC has a contract with several response contractors that can be contacted in the event of a spill/release. Upon assessment of the spill incident, SPLC’s CS will call one or more of the contractors to contain and/or remove the contaminated soil if the CS determines that the response cannot be handled in-house.

Table 2 – Local Emergency Response Agencies

Agency	Telephone Number
Ambulance	9-1-1
Fire Department	9-1-1
Police Department	9-1-1
Allegheny County Emergency Management Agency	412-473-1000
Beaver County Emergency Management Agency	724-775-0800
Beaver County Emergency Management Agency	724-228-6911

Table 3 lists federal and state agencies that would be contacted, as appropriate, in the event of an emergency, accident, or chemical release.

Table 3 – Agency Notification List

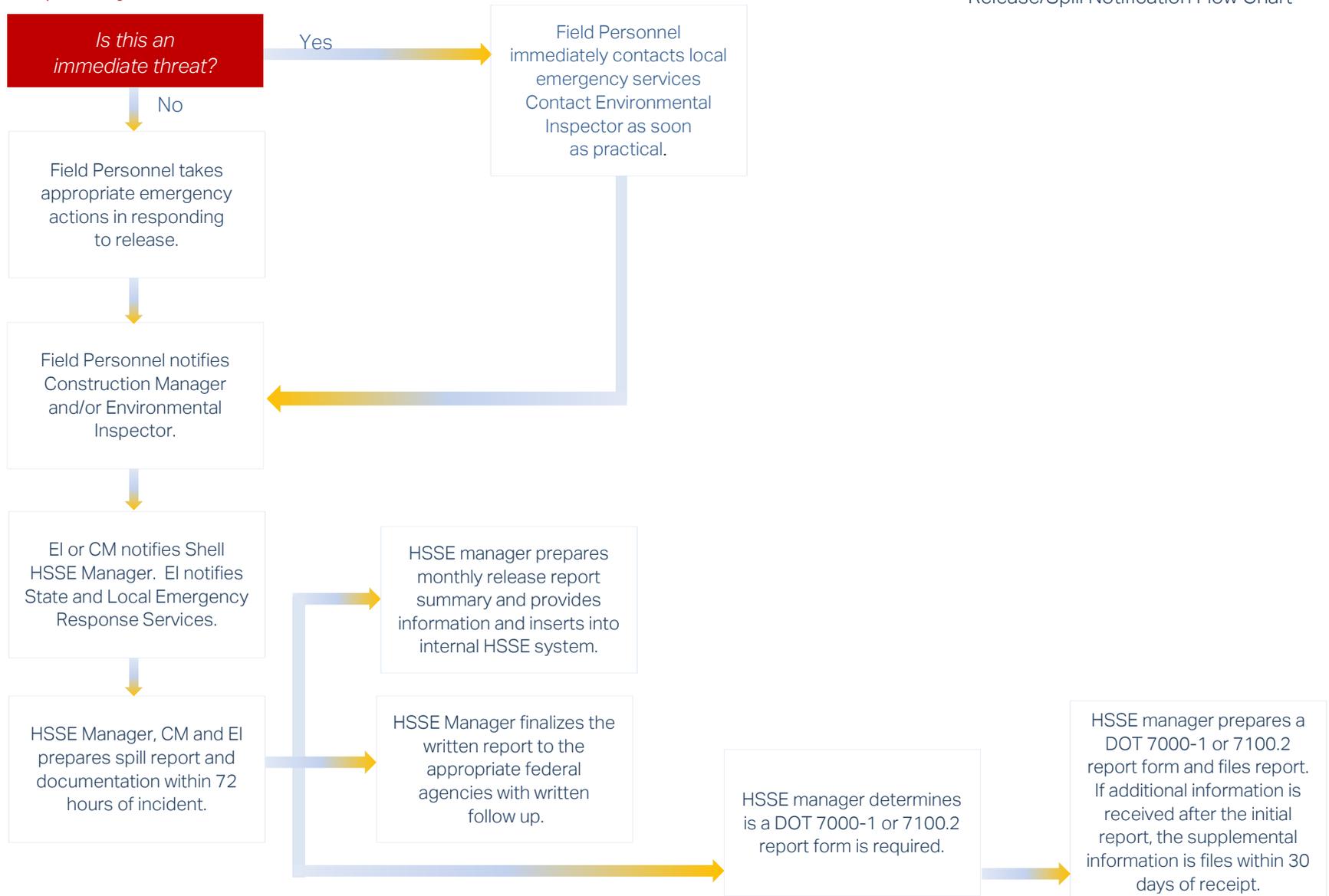
Agency	Telephone Number
PaDEP Southwest Regional Office	412-442-4000
Pennsylvania Emergency Management Agency	717-651-2001
EPA Region III Hotline	215-814-5000
Federal National Response Center (NRC)	800-424-8802
US Coast Guard National Response Center	800-424-8802
Pennsylvania Fish and Boat Commission	717-477-5717
Chemical Transportation Emergency Center	800-424-9300
Regional Poison Information Center	800-222-1222



16.0 CHAIN OF COMMAND

Field Personnel discover a release/spill/major incident.

Shell Pipeline Company LP
FALCON ETHANE PIPELINE SYSTEM
Release/Spill Notification Flow Chart



17.0 EVACUATION PLAN FOR INSTALLATION PERSONNEL

Personnel that encounter an incident or event while working on this Project site will call the EI immediately to report the incident. Additionally, emergency services will be notified if necessary. All other on-site employees and contractors will be notified and any persons that are located in the vicinity of the incident will be removed from the area. Finally, SPLC will take steps to account for the total number of persons involved at the worksite. All persons will remain grouped together at a safe distance from the site until emergency services or the Emergency Response Coordinator arrives.

The following key points will be adhered to:

- All work not associated with emergency containment will be STOPPED;
- The immediate area will be cleared of all non-emergency response personnel. All others will remain at the gathering point;
- The Emergency Response Coordinator's instructions WILL be followed;
- All personnel will be required to remain with the group until instructed otherwise by the Emergency Response Coordinator or other SPLC representatives;
- Ingress and egress will be facilitated for all emergency vehicles by SPLC personnel; and
- Work WILL NOT resume at the site until proper notification has been provided by SPLC personnel.

18.0 IMPLEMENTATION SCHEDULE

If any area of this Plan needs to be developed further, or is incomplete, the item will be revised or completed in a timely manner and included in a revised PPC Plan that will be submitted to the PaDEP.

Appendix A

Environmental Incident Report Form

APPENDIX A

ENVIRONMENTAL INCIDENT REPORT

Location (Facility/Specific Location):											
Date Incident Occurred:											
Time Incident Occurred:											
Type of Incident (Check all that apply):											
<table style="width: 100%; border: none;"> <tr> <td style="width: 50%; border: none;"><input type="checkbox"/> Contaminated Ground Water/Soil</td> <td style="width: 50%; border: none;"><input type="checkbox"/> Oil Spill</td> </tr> <tr> <td style="border: none;"><input type="checkbox"/> Fish Kill</td> <td style="border: none;"><input type="checkbox"/> PCB Spill</td> </tr> <tr> <td style="border: none;"><input type="checkbox"/> Hazardous Substance Spill/Release</td> <td style="border: none;"><input type="checkbox"/> Storage Tank (leak or other problem)</td> </tr> <tr> <td style="border: none;"><input type="checkbox"/> Migratory Bird</td> <td style="border: none;"><input type="checkbox"/> Wildlife Concern</td> </tr> <tr> <td style="border: none;"><input type="checkbox"/> Other _____</td> <td></td> </tr> </table>		<input type="checkbox"/> Contaminated Ground Water/Soil	<input type="checkbox"/> Oil Spill	<input type="checkbox"/> Fish Kill	<input type="checkbox"/> PCB Spill	<input type="checkbox"/> Hazardous Substance Spill/Release	<input type="checkbox"/> Storage Tank (leak or other problem)	<input type="checkbox"/> Migratory Bird	<input type="checkbox"/> Wildlife Concern	<input type="checkbox"/> Other _____	
<input type="checkbox"/> Contaminated Ground Water/Soil	<input type="checkbox"/> Oil Spill										
<input type="checkbox"/> Fish Kill	<input type="checkbox"/> PCB Spill										
<input type="checkbox"/> Hazardous Substance Spill/Release	<input type="checkbox"/> Storage Tank (leak or other problem)										
<input type="checkbox"/> Migratory Bird	<input type="checkbox"/> Wildlife Concern										
<input type="checkbox"/> Other _____											
If Spill:											
Type of Substance:											
Origin of Substance:											
Amount (if known):											
Spill On (floor, ground, water):											
Oil Spill to Water or Storm Drain (If any selection is entered, written notice to EPA is due within 60 days)	<input type="checkbox"/> Spill greater than 1000 gallons <input type="checkbox"/> Two spills > 42 gal. within a 12 month period Date of Previous Spill _____										
Description of Incident (include cause, if known, specific location, amount, duration, and impact on environment)											
Immediate Action/Cleanup Procedures											

Action Taken or Planned to Prevent Recurrence			
Notifications Made			
	Name	Date	Time
Emergency Response Coordinator			
Other facility Personnel			
Environmental Services			
State Agency			
National Response Center			
Other (i.e., Local Agency)			
Regulatory Personnel on the Scene (Name and Agency)			
Site Contact for Additional Information (Name and Title)		Telephone Number (With Area Code)	
Incident Reported By (Name and Title)		Telephone Number (With Area Code)	
Form Completed By (Signature)		Date (MM/DD/YYYY)	

Appendix B

Unanticipated Discovery of Contamination Plan



Shell Pipeline Company LP

Falcon Ethane Pipeline System

Unanticipated Discovery of Contamination Plan

Project	Falcon Ethane Pipeline System
Document Title	Unanticipated Discovery of Contamination Plan
Document Number	T.14042-DISCOVERY-CONT-PLN-0001
Document Revision	0
Document Status	Issued for Use
Document Type	HX 7506
Issue Date	2018-07-27
Expiry Date	None
Security Classification	Unrestricted

1. INTRODUCTION

The purpose of this Plan is to provide Shell Pipeline Company LP (SPLC) and Contractors (Project Team) with guidelines for ensuring the proper management of unanticipated discovery of hazardous materials (contamination) during construction of the Falcon Ethane Pipeline Project (Project), in an effort to minimize hazards to human health or the environment. Activities associated with construction of the pipeline (e.g. clearing of the Right of Way, horizontal directional drilling (HDDs), and required excavation, etc.) will commence during the fourth quarter of 2018.

This Plan will be followed in the event that there is an unanticipated discovery of hazardous materials (contamination) during construction activities, which is unrelated to the Project. During the Right of Way (RoW) acquisition process, SPLC interviewed property owners, and reviewed readily available information which would indicate the potential presence and risk of contaminants within the Falcon construction areas, and concluded there there is no evidence that construction activities will occur in a current or previous industrial location where legacy spills or releases of hazardous materials would be encountered.

2. LOCAL RESPONSE AND NOTIFICATIONS

In the event that such materials are encountered during construction that give the Project Team reason to suspect the presence of legacy spills or releases (e.g., malodorous soils and/or visible staining, sheen or otherwise inconsistent with soil expectations) SPLC will suspend field activities at the location of discovery and report the encounter to the relevant regulatory agencies as described further below. SPLC will also coordinate with regulatory agencies to determine whether and what types of limited response efforts (e.g., potential sampling and management of materials at offsite facilities) would occur in accordance with applicable regulatory requirements and the attached *Waste and Recoverable Material (WRM) Procedure, Revision 2* (November 14, 2016).

Depending on the nature of the discovery, state or local emergency response measures may be required as per the Contractor's Emergency Response Plan¹ to manage the situation. All surrounding field personnel will be removed from the potentially contaminated area until response activities have been initiated, regulatory agencies have been notified, and, where necessary, the types and levels of potential contamination can be verified as per the WRM Procedure (Attachment 1). Without exception, personnel safety is first priority.

¹ Available following contractor selection

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The following internal and external notifications will be made as soon as practicable but no later than 24 hours from time of discovery:

- Contractor Construction Supervisor to notify Shell Chief Inspector
- Shell Chief Inspector to notify Shell Construction Manager
- Shell Construction Manager to notify Shell Project Manager
- Shell Project Manager or designee to notify the following state agencies, as applicable to location of discovery:

State	County	Waste Type	Name	Title	Phone
PA	All	All	Scott Swarm	Waste Management Program Manager, DEP Southwest Regional Office	412-442-4125
OH	Jefferson	Solid Waste	Sara Anderson	Materials and Waste Management Inspector	740-380-5219
OH	Jefferson & Harrison	Hazardous Waste	Scott Bergreen	Environmental Supervisor	740-380-5288
OH	Harrison	Solid Waste	Nathan Johnson	Materials and Waste Management Inspector	740-380-5439
OH	Carroll	Solid Waste	Colum McKenna	Materials and Waste Management Inspector	330-963-1263
OH	Carroll	Hazardous Waste	Natalie Oryshkewych	Environmental Manager	330-963-1267
WV	All	Solid Waste	Chris Dudek	Environmental Inspector	304.238.1220 ext 3528 (office) 304.389.7383 (cell)
WV	All	Hazardous Waste	Mark Smith	Environmental Inspector	304.238.1220 ext 3521 (office) 304.789.1181 (cell)

- Shell Project Manager or designee to notify GHD, SPLC's authorized consultant for Waste and Recoverable Material Management to coordinate sampling, testing, documentation, etc. as described below. GHD Contact: Jamie Geil (Office: 512-777-5835, Mobile: 512-461-7424, Email: jaim.geil@ghd.com).

3. SAMPLING AND SEGREGATION

When necessary, a representative sample will be collected and analyzed by an approved lab for parameters as described in the attached WMR Procedure. The remaining material will be segregated and stored in accordance with the WMR Procedure until the results of the analytical testing are complete and proper disposal has been arranged.

Approved local labs for sample testing include:

Pace Analytical
 1638 Roseytown Road,
 Suites 2,3,4
 Greensburg, PA 15601
 Contact: Brian Schaffner
 Account Executive
 Phone: (412) 559-2104 Cell
 Fax: (724) 850-5601
Brian.Schaffner@pacelabs.com

TestAmerica Pittsburgh
 301 Alpha Drive
 RIDC Park
 Pittsburgh, PA 15238
 Contact: Dominic Nestasie
 Manager of Project Management
 Phone: 412.963.7058
dominic.nestasie@testamericainc.com

3.1. Sampling Results and Material Handling

If the results of the analytical testing indicate that the material is uncontaminated, construction will resume, and segregated materials may be reused as a part of the construction process. Note in Pennsylvania, before the material is reused in the RoW it will be confirmed that it meets the levels listed in Table GP-1a from Residual Waste Beneficial Use Permit WMGR096 per the PADEP Management of Fill Policy 258-2182-773 (Attachment 2 of this Plan).

If the results of the analytical testing indicate that the materials are contaminated and unrelated to Project activities, the Shell Project Manager or designee will notify the applicable state agencies and coordinate response activities, as necessary. The Project team may attempt to identify the responsible party for the contamination to facilitate disposal. Disposal of contamination by the Project will be limited to enable construction and will be in accordance with the WRM Procedure,

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including addressing requirements for the generating state and receiving state. Disposal sites have been identified for the Project and are provided in Attachment 3 of this plan.

Attachment 1: Waste and Recoverable Material (WRM) Procedure



WRM 11-14-16.pdf

Attachment 2: PADEP Requirements for Regulated Fill

Title	Attachment
PADEP Management of Fill Policy 258-2182-773.	 PADEP MANAGEMENT_OF_I
Table GP-1a from Residual Waste Beneficial Use Permit WMGR096	 TableGP-1a from WMGR096.pdf

Attachment 3: Approved Disposal Sites

The following site is approved for disposal of hazardous and non-hazardous materials.

Name	Street Address	City	State	Zip Code
Cycle Chem Inc.	550 Industrial Drive	Lewisberry	PA	17339

The following sites are approved for disposal of hazardous materials.

Name	Street Address	City	State	Zip Code
Heritage Thermal Services	1250 St. George St.	East Liverpool	OH	43920
Ross Incineration Services	36790 Giles Rd	Grafton	OH	44044

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The following sites are approved for disposal of non-hazardous materials.

Name	Street Address	City	State	Zip Code
Advanced Disposal Greentree Landfill	635 Toby Road	Kersey	PA	15846
Republic Services Inc. Carbon Limestone Landfill	8100 South Stateline Road	Lowellville	OH	44436
Waste Management Inc.- American Landfill	7916 Chapel Street SE	Waynesburg	OH	44688
Waste Management Inc.-Arden Landfill	100 Rangos Lane	Washington	PA	15301
Waste Management Inc.- Mahoning Landfill	3510 East Garfield Rd.	New Springfield	OH	44443
Waste Management Inc.- Northwest Landfill	1436 West Sunbury Road	West Sunbury	PA	16061
Waste Management Inc.- Phoenix Resources Landfill	782 Antrim Road	Wellsboro	PA	16901

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