
Spill Prevention and Response Procedures

Line MB Extension Project
Baltimore and Harford Counties, MD

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Acronyms and Abbreviations

Columbia	Columbia Gas Transmission, LLC
EI	Environmental Inspector
MDE	Maryland Department of Environment
Project	Line MB Extension Project
ROW	Right-of-way

Spill Prevention

1.1 Preventative Measures

Spills of any amount of petroleum products or polluting materials are to be prevented. The following document outlines the procedures to help avoid spills and minimize the impact of spill if they accidentally occur. The spill prevention and control methods listed in this section are based on approved spill control plans that Columbia Gas Transmission, LLC (Columba) has used successfully in the past. This document addresses actions used to prevent spills in addition to specifying actions that will be taken should any spills occur, including emergency notification procedures. The Line MB Extension Project (Project) will staff an on-site Environmental Inspector (EI) who will be responsible for ensuring that contractors implement and maintain spill control measures.

1.1.1 Training

The Contractor will instruct personnel on the operation and maintenance of equipment to prevent the accidental discharge or spill of fuel, oil, and lubricants. Personnel will also be made aware of the pollution control laws, rules, and regulations applicable to their work.

Spill prevention briefings with the construction crew will be scheduled and conducted by the EI to insure adequate understanding of spill prevention measures. These briefings will highlight:

- Precautionary measures to prevent spills;
- Sources of spills, such as equipment failure or malfunction;
- Standard operating procedures in case of a spill;
- Equipment, materials, and supplies available for clean-up of a spill; and
- A list of known spill events.

1.1.2 Equipment Inspection/Maintenance

The Contractor will inspect and maintain equipment that must be fueled and lubricated according to a strict schedule. The Contractor will submit to Columbia for approval written documentation of the methods used and work performed.

All containers, valves, pipelines, and hoses will be examined regularly to assess their general condition. The examination will identify any signs of deterioration that could cause a spill and signs of leaks, such as accumulated fluids. All leaks will be promptly corrected or repaired.

1.1.3 Refueling Operations

The Contractor will insure that equipment is refueled and lubricated within the ROW and at least 100 feet away from all waterbodies and wetlands with the following exceptions:

- Areas such as rugged terrain or steep slopes where movement of equipment to refueling stations would cause excessive disturbance to the ROW;
- Areas where removing equipment from a wetland for servicing would increase adverse impacts to the wetland;
- When specialized refueling equipment (i.e., low ground weight buggies with a special mounted fuel tank within secondary containment) is used for refueling equipment in lengthy wetlands;
- Sites where moving equipment to refueling stations from pre-fabricated equipment pads is impracticable or where there is a barrier from the waterbody/wetland (i.e., road or railroad);
- Locations where the waterbody or wetland is located adjacent to a road crossing (from which the equipment can be serviced); and

- Refueling of immobile equipment including, but not limited to, bending and boring machines, air compressors, padding machines, and hydro-test fill pumps.

In these areas, auxiliary fuel tanks will be used to reduce the frequency of refueling operations and in no case will refueling take place within 200 feet of any known potable water wells.

The Contractor will assure that all refueling is done pursuant to the following conditions:

Impact minimization measures and equipment will be sufficient to prevent discharged fluids from leaving the ROW or reaching wetlands or waterbodies, and be readily available for use. These will include some combination of the following:

- Impact minimization measures and equipment will be sufficient to prevent discharged fluids from leaving the ROW or reaching wetlands or waterbodies, and be readily available for use. These will include some combination of the following:
 - dikes, berms or retaining walls sufficiently impervious to contain spilled oil;
 - sorbent and barrier materials in quantities determined by the Contractor to be sufficient to capture the largest reasonably foreseeable spill;
 - drums or containers suitable for holding and transporting contaminated materials;
 - curbing;
 - culverts, gutters, or other drainage systems;
 - weirs, booms, or other barriers;
 - spill diversion or retention ponds; and
 - sumps and collection systems.
- All spills will be cleaned up immediately. Containment equipment will not be used for storing contaminated material.

1.1.4 Storage

Storage containment areas will not have drains, unless such drains lead to a containment area or vessel where the entire spill can be recovered.

SECTION 2

Spill Response Measures

Containment is the immediate priority in the case of a spill. A spill will be contained on Columbia's property or ROW, if possible. Clean up procedures will begin immediately after a spill is contained. In no case will containment equipment be used to store contaminated material.

In case of a spill, the Contractor or utility inspector (who ever sees it first) will immediately notify Monitoring Center at 1-800-835-7191 in accordance with Columba policies, plans and procedures (Plan Number 120.02.01). Columbia's Environmental Health and Safety Department will be responsible for contacting the appropriate agencies except as provided below.

If the call to the Monitoring Center is not returned within 30 minutes and the spill has impacted water, the person discovering the spill or release will contact the National Response Center at 1-800-424-8802 and report the release. That person will continue calling the Monitoring Center until a representative is reached.

If a spill should occur, Columbia will ensure immediate action is taken to minimize the impact of the spill and to see that appropriate cleanup action is immediately undertaken.

Contact information:

Columbia's Monitoring Center: 1-800-835-7191

National Spill Response Center: 1-800-424-8802

MDE Emergency Response Division: 1-866-633-4686

If a spill enters a body of water or a wetland, the Contractor will immediately perform the following:

- The source of the spill will be immediately stopped;
- The spill will be contained by placing sorbing booms or construction dikes;
- The spill will be collected with sorbing materials, skimmed off water surfaces with booms, and/or the contaminated soil will be excavated; and
- The waste materials will be properly stored and disposed in accordance with Columba policy.

The affected areas will be restored as closely as possible to their previous condition. If the EI determines that a spill is small enough such that the construction crew can safely handle it, the crew will use construction equipment to containerize all spilled material, contaminated soil, and sorbent material in a manner consistent with the spilled material's characterization.

If the EI determines that a spill cannot be adequately excavated and disposed of by the construction crew alone, the Contractor will contact waste containment specialists. The EI will ensure that all excavated wastes are transported to a disposal facility licensed to accept such wastes. Wastes will not be transported to a company facility unless the Environmental Compliance Specialist approves it in writing.

The Contractor will prepare a Construction Site Spill Report Form (attached) to be given to the EI that includes:

- the date, time and location of the occurrence;
- a description of the material spilled;
- the quantity spilled;
- the circumstances that caused the spill;
- a list of waterbodies affected or potentially affected by the spill;
- a statement verifying whether a sheen is present;
- the size of the affected area;

- an estimate of the depth that the material has reached in water or on soil;
- a determination of whether the spill will migrate off of Columbia's property or the ROW;
- a determination of whether the spill is under control;
- a statement verifying that clean-up has begun and a description of the methods being used to clean up the spill; and
- the names of the people observing the spill (with their affiliations).

The EI will assure that the Contractor notifies the appropriate agencies if it is determined that a spill exceeds reportable quantity thresholds.

The National Response Center (1-800-424-8802) will be notified immediately if spills occur above threshold levels (Clean Water Act, 40 CFR 110.10) into surface waters or wetlands.

Suggested Spill Equipment List

The Contractor's choice of impact minimization measures and equipment will be tailored to meet the characteristics of the affected terrain as well as the types and amounts of material that could potentially be spilled.

3.1 Terrestrial Construction

General equipment that Columbia and/or its Contractor will use for spill containment and cleanup on terrestrial areas includes:

- Absorbents (pillows, socks, and wipe sheets) for containment and pick up of spilled liquids;
- Commercially available spill kits (or the functional equivalent thereof) that are prepackaged, self-contained spill kits containing a variety of absorbents for small to large spills;
- Structures such as gutters, culverts, and dikes for immediate spill containment;
- Shovels, backhoes, etc., for excavating contaminated materials;
- Sumps and collection systems; and
- Drums, barrels, and temporary storage bags to clean up and transport contaminated materials.

3.1.1 Fuels and Lubricating Oil Storage

The Contractor will implement special measures to prevent spills in areas where trucks carrying fuel and where oil barrels are loaded. Containment equipment will be kept close to tanks and barrels to minimize spill response time, and will include absorbent pads or mats. The quantity and capabilities of the mats will be sufficient to capture the largest foreseeable spill, given ROW characteristics and crankcase and other fuel vessel capacities.

3.1.2 Routine Refueling and Maintenance

Absorbent pads and mats will be placed on the ground beneath equipment before refueling and maintenance. Equipment that will be stored on site for routine refueling and maintenance includes small sorbent kits (or their functional equivalent).

3.1.3 Equipment Failure

Kits with the capacity of absorbing up to five gallons of liquid can fit beneath the operator's seat on construction equipment for use in an equipment failure.

3.2 Wetland and Waterbody Crossings

For each wetland and waterbody crossed, the equipment listed below will be available in addition to that needed for terrestrial construction. This equipment will be stored close to the waterbody or wetland to minimize response time, and will include:

- Oil containment booms and the related equipment needed for rapid deployment, and
- Equipment to remove oil from water, such as hydrophobic absorbent booms and mats, and mechanical skimmers.

**Line MB Extension Project
Spill Report Form**

Instructions: Fill in all blanks with the most detailed information available. Write "NA" for any blanks that do not apply.
Call the National Response Center within 1 hour of any wetland or waterbody spills.
Call the Georgia Response Center and the Emergency Contractor if a spill is dangerous to the environment or a hazardous material.

Name: _____

Date/Time: _____

LOCATION

MP/St.#: _____ Tract ID: _____
Weather: _____ Ground Condition: _____
Nearest Wetland: _____ Wetland ID/Dir/Dist: _____
Nearest Waterbody: _____ Waterbody Name/Dir/Dist: _____

SPILLED OR RELEASED SUBSTANCE

Check All That Apply: Diesel [] Oil [] Transmission []
Gasoline [] Hydraulic [] Other (explain) _____

CAUSE OF SPILL OR RELEASE

RECEIVING MEDIUM (water, paved surface, vegetated pasture, etc)

DESCRIPTION OF ACTIONS TAKEN TO REMEDIATE THE SPILL OR RELEASE

DISPOSAL

Container Type: Bag [] Barrel [] Drum [] Other (explain): _____
Disposal Location: Yard [] Other (explain): _____

NOTIFICATION

Spill Reported To: _____ Reported Date/Time: _____