Appendix D

Guardian’s Spill Prevention, Containment, and Countermeasures Plan

GUARDIAN PIPELINE EXPANSION AND EXTENSION PROJECT

Spill Prevention, Containment, and Countermeasures Plan

October 2006

Guardian Pipeline Expansion and Extension Project

Spill Prevention, Containment, and Countermeasures Plan

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1.0 INTRODUCTION

The Guardian Pipeline Expansion and Extension (Guardian or G-II) Project has prepared this Spill Prevention, Containment, and Countermeasure (SPCC) Plan (SPCC Plan) to be implemented during construction of the G-II Project in accordance with Section IV.A of Guardian's *Wetland and Waterbody Construction and Mitigation Procedures* (Procedures) dated December August 20, 2006. This SPCC Plan outlines specific preventative measures and practices to reduce the likelihood of an accidental release of a hazardous or regulated liquid and, in the event such a release occurs, to expedite the response to and remediation of the release.

This SPCC Plan restricts the location of fuel storage, fueling activities, and construction equipment maintenance along the construction right-of-way and provides procedures for these activities. Training and lines of communication to facilitate the prevention, response, containment, and cleanup of spills during construction activities are also described.

All contractor and subcontractor personnel working on the Guardian pipeline right-of-way are responsible for implementation of the measures and procedures defined in this SPCC Plan. This Plan will be included in both the bid and the contract documents as contractual requirements and instructions to the contractor.

2.0 PREVENTATIVE MEASURES

Guardian will require that contractors minimize, to the extent practicable, the potential for and consequences of a spill during construction of the project facilities. Guardian will require contractors to comply with applicable environmental and safety laws and regulations, including compliance by all its subcontractors. The contractors will be required to maintain a copy of this Plan available onsite to all personnel and provide a copy to all subcontractors.

2.1 Training

Guardian will require that all contractor employees involved with transporting or handling fueling equipment or maintaining construction equipment be required to complete spill training before they commence work on the right-of-way. Guardian will audit contractor compliance with

this requirement. Spill training will also be required for contractor supervisory personnel prior to commencement of work on the right-of-way for each spread. These training sessions will be conducted by the construction contractor and a representative of Guardian and will provide information concerning pollution control laws; inform personnel concerning the proper operation and maintenance of fueling equipment; and inform personnel of spill prevention and response requirements. Measures, responsibilities, and provisions of this SPCC Plan and identification of response team individuals (attachment 1) will be incorporated into the training.

Training of other workers will be provided through ongoing weekly safety meetings. Topics will include spill handling and personal responsibility for initiating and adhering to appropriate procedures. These weekly sessions will be held by the contractor as crew “tail gate” meetings. Guardian will audit the contractor compliance with this requirement and instruct the contractor to replace, after the first warning, foremen who do not hold such meetings.

2.2 Release Response Equipment

The contractor shall supply each construction crew with a quantity of absorbent and barrier materials sufficient to contain and recover spills that could potentially occur from the equipment with the largest on-board volume of fuel and lubricant. These materials may include, but are not limited to, drip pans, buckets, absorbent pads, containment booms, straw bales, absorbent clay, sawdust, floor-drying agents, spill containment barriers, plastic sheeting, skimmer pumps, covered holding tanks, and fire extinguishers.

The contractor shall make known to all construction personnel the yard and warehouse locations of spill response equipment and materials and have them readily accessible during construction.

2.3 Equipment Inspection

Prior to moving equipment onto the construction right-of-way, the contractor shall visually inspect each piece of equipment for cracks, excessive corrosion, or other flaws that may compromise the integrity of its fuel, hydraulic, or cooling systems. The contractor shall repair or replace leaking equipment immediately after a leak is detected.

3.0 REGULATED MATERIALS STORAGE AND HANDLING

3.1 Contractor Yards

Contractors shall store fuel, petroleum products, and hazardous materials at the yards in a manner designed to protect the environment. Storage shall be provided with secondary containment structures lined with an impervious material that provides a minimum containment volume equal to 150 percent of the volume of the largest storage vessel located in the yard. The contractor shall construct these containment structures such that in the event of a leak or spill, the liquid will be contained within the structures. If earthen containment dikes are used, they shall be constructed with slopes no steeper than 3:1 (horizontal to vertical) to limit erosion and provide structural stability. Containment areas shall not have drains.

Bulk storage tanks shall not be placed in areas subject to periodic flooding or erosion. Accumulated rainwater may be removed if authorized by a Guardian Environmental Inspector (EI). If visual inspection indicates that no spillage has occurred in the containment structure and if approved by a Guardian EI, accumulated water may be drawn off and sprayed on the surrounding upland areas. If spillage has occurred in the structure, accumulated waste water shall be drawn off and pumped into a storage vessel for disposal.

The contractor shall visually inspect aboveground bulk tanks frequently and whenever the tank is refilled. Drain valves on temporary storage tanks shall be locked to prevent accidental or unauthorized discharges from the tank. The contractor shall correct visible leaks in tanks as soon as possible.

All fuel nozzles shall be equipped with functional automatic shut-off valves. Prior to departure of any fuel tank truck, all outlets on the vehicle shall be examined by the driver for leakage and tightened, adjusted, or replaced to prevent liquid leaking while in transit.

Routine equipment maintenance of wheel-mounted vehicles, such as oil changes, shall be accomplished at the contractor yards or staging areas to the greatest extent practical. Routine maintenance of track-mounted equipment shall be conducted in a manner to gather oil and other discharges and remove them from the right-of-way to a suitable recycling or disposal site.

Storage containers shall display labels that identify the contents of the container and whether the contents are hazardous. Copies of Material Safety Data Sheets (MSDS) for all

potentially hazardous materials will be provided and maintained by the contractor and be accessible to all contractor personnel.

Table 1 summarizes typical vehicle and equipment fuels, lubricants, and hazardous materials stored or used during construction, and briefly describes the location, typical quantities, and usual methods of storage. Storage methods and quantities vary with length of construction spread, time of year, and type of terrain. The contractor shall provide, maintain, and make available the appropriate MSDS documents for each of these materials and those for any other hazardous or controlled materials utilized on the right-of-way or in the contractor yards at a location accessible to all contractor and Guardian employees.

TABLE 1

Typical Fuel, Lubricants, and Hazardous Materials

Fluid Uses	Fluids	Typical Quantity Per Location	Method of Storage	Storage Location
Fuels	Diesel	5,000 – 10,000 Gallons	Tanks or Tankers	Contractor Yard Warehouse/fuel vehicle parking areas
	Gasoline	5,000 – 10,000 Gallons	Tanks or Tankers, 10-Gallon containers, Pick-up Tanks	Contractor Yard Warehouse/fuel vehicle parking areas
Lubricants	Engine Oil	<100 Gallons	Bulk Storage or Retail Packaging	Contractor Yard Warehouse
	Transmission/ Drive Train Oil	<50 Gallons	Retail Packaging on Service Trucks	Contractor Yard Warehouse, Service Trucks
	Hydraulic Oil	<100 Gallons	Bulk Storage or Retail Packaging	Contractor Yard Warehouse, Service Trucks
	Gear Oil	<50 Gallons	Retail Packaging on Service Trucks	Contractor Yard Warehouse, Service Trucks
	Lubricating Grease	<25 Gallons	Tubes stored in Paper Cases	Contractor Yard Warehouse, Service Trucks
Miscellaneous/ Coolants, Hydraulic fluids	Ethylene Glycol	<100 Gallons	Bulk Storage or Retail Packaging	Contractor Yard Warehouse, Service Trucks
	Propylene Glycol	<100 Gallons	Bulk Storage or Retail Packaging	Contractor Yard Warehouse, Service Trucks
	Power Steering Fluid	<50 Gallons	Retail Packaging on Service Trucks	Contractor Yard Warehouse, Service Trucks
	Brake Fluid	< 50 Gallons	Retail Packaging on Service Trucks	Contractor Yard Warehouse, Service Trucks
	Propane	25-100 Gallons	Pressurized Tanks	Contractor Yard Warehouse, Welding Trucks

3.2 Activities on the Construction Right-of-Way

The contractor shall undertake preventative measures to avoid environmental impacts from refueling and lubrication activities on the construction right-of-way.

Refuelling and lubricating of construction equipment shall be restricted to upland areas at least 100 feet from the edge of any streams, wetlands, ditches, and other waterbodies; 200 feet from private water supply wells; and 400 feet from public water supply wells, wherever possible. If refuelling cannot be avoided in these areas, refer to section 3.3 of this SPCC Plan. Wheeled and tracked construction equipment shall be moved to an upland area more than 100 feet from streams, wetlands, ditches, and other waterbodies for refueling and at the end of each work day. Fuel and service truck drivers shall be responsible for spill prevention during fueling and service activities.

Fuels and lubricants shall be stored in designated areas and in appropriate service vehicles. Storage sites for fuels, other petroleum products, chemicals, and hazardous materials including wastes shall be located in upland areas. To prevent these materials and other potential contaminants from reaching waterways, no hazardous substances shall be stored within 100 feet of streams and/or within 200 feet of private wells (400 feet for public wells). If fuel must be stored in these areas, refer to section 3.3 of this SPCC Plan. The contractor shall confirm with a Guardian EI the locations of areas where these activities are prohibited prior to construction crews entering that area with equipment.

The contractor shall maintain a minimum of 20 pounds of suitable commercial absorbent and barrier materials at each contractor yard and on fuel and service trucks to allow rapid containment and recovery of a spill. Absorbent and barrier materials shall also be utilized to contain runoff from spill areas. Fuel trucks shall also be equipped with shovels and an assortment of hand tools to aid in the containment of a spill.

Equipment shall not be washed in streams, wetlands, ditches, or other waterbodies. Equipment operators shall be responsible for prompt reporting and mitigation of any fuel or lubricant spills from equipment.

3.3 Restricted Refueling Areas

Restricted refuelling areas include areas where the buffer zone (100 feet from a wetland or waterbody, 200 and 400 feet from private and public water wells, respectively) cannot be

maintained. Potential situations where plans may be approved by the EI to allow refuelling in restricted areas include extensive wetland crossings with limited right-of-way access, continuous construction at stream/river crossings, and the required placement and operation of stationary equipment such as dewatering pumps, generators, and boring/drilling equipment. The requirement for any refuelling and equipment service within restricted areas shall be verified and approved by a Guardian EI prior to initiating such activity. Within these areas, the previously described fuel handling and refuelling procedures and the following procedures shall also apply.

Tracked Equipment

In wetlands where no upland site is available for refueling, auxiliary fuel tanks may be mounted to equipment to minimize the need for refueling.

Only a fuel truck with a maximum of 300 gallons of fuel may enter restricted areas to refuel construction equipment. Two trained personnel shall be present during refuelling to reduce the potential for spills or accidents.

Stationary Equipment

Equipment such as non-portable, stationary pumps may be fitted with auxiliary tanks as appropriate. Such auxiliary tanks shall be placed within a secondary containment structure. Refuelling of dewatering pumps, generators, and other small, portable equipment shall be performed using approved containers with a maximum volume of 10 gallons. Fuel containers shall be stored in an upland area at least 100 feet from wetlands and waterbodies.

3.4 Vehicle and Equipment Maintenance

All routine vehicle and equipment maintenance on the right-of-way, involving fluid replacement, shall be conducted outside the boundary restrictions for wetlands, waterbodies, and water wells. Before lubricants are drained from the construction equipment, a suitable containment vessel and plastic sheeting shall be placed under the equipment to collect any spilled material. The contractor shall take necessary precautions to ensure that material that might accumulate on the liner does not spill on the ground surface. Vehicle maintenance wastes, including used oils and other fluids, shall be handled and managed by personnel trained in the procedures outlined in this plan. Vehicle maintenance wastes shall be stored and disposed of in accordance with applicable federal, state and local regulations. Non routine

repairs can be conducted within the buffer zone only on approval from a Guardian EI and only with adequate containment.

4.0 SPILL RESPONSE

In the event of a spill, the release shall be contained and remediated as soon as possible. The order of priorities after discovering a spill are to protect the safety of personnel and the public, minimize damage to the environment, and control costs associated with cleanup and remediation.

4.1 Spill Coordinator

The contractor for each spread shall appoint a Spill Coordinator who shall be responsible for the reporting of spills, coordinating contractor personnel for spill cleanup, subsequent site investigations, and associated incident reports. The Spill Coordinator shall report to the Guardian EI and may be removed from that role by Guardian at Guardian's discretion. The Spill Coordinator along with the EI shall be responsible for determining the extent of the isolation area, referred to in Section 4.0 of this Plan.

4.2 Immediate Response

ALL SPILLS, REGARDLESS OF SIZE, MUST BE REPORTED TO THE SPILL COORDINATOR AND/OR THE GUARDIAN ENVIRONMENTAL INSPECTOR

The person observing the incident shall take the following actions:

1. Assess the safety of the situation (including the risk to the surrounding public).
2. If safe to do so, make every effort to remove potential ignition sources and stop the source of the spill.
3. Promptly notify the Spill Coordinator and/or the Guardian EI. Report your name, the spill location, and the extent of the incident.

Upon learning of the spill, the Spill Coordinator shall implement the following measures:

4. For an upland spill, if necessary, berms shall be constructed with available equipment to physically contain the spill.

5. Sorbent materials shall be applied to the spill area. Contaminated soils and vegetation shall be excavated and temporarily placed on and covered by plastic sheeting in a containment area a minimum of 100 feet away from any wetland or waterbody, until proper disposal is arranged.

6. If a spill is beyond the scope of on-site equipment and personnel, an Emergency Response Contractor shall be secured to further contain and clean up the spill.

4.3 Wetland or Waterbody Response

Regardless of size, the following conditions apply if a spill occurs near or into a stream, wetland, or other waterbody:

1. For spills in standing water, floating booms, skimmer pumps, and holding tanks shall be used as appropriate by the contractor to recover and contain released materials on the surface of the water.

2. For a spill threatening a waterbody, berms and/or trenches shall be constructed to contain the spill before it reaches the waterbody. Deployment of booms, sorbent materials, and skimmers may be necessary if the spill reaches the water. The spilled product shall be collected and the affected area cleaned up in accordance with appropriate state or federal regulations.

3. Contaminated soils in wetlands must be excavated, and placed on and covered by plastic sheeting in approved containment areas a minimum of 100 feet away from the wetland or waterbody. Contaminated soil shall be disposed of as soon as possible in accordance with appropriate state or federal regulations.

5.0 REPORTING

With assistance from a Guardian EI, the Spill Coordinator is responsible for the completion of the G-II Project Spill Report Form (attachment 2). Completion of this form will assist in the assessment of the spill and provide information necessary for agency notification. The form shall be completed and submitted to a Guardian representative within 24 hours of the occurrence. A Guardian representative will notify the appropriate agencies (see section 6.0).

6.0 NOTIFICATIONS

IN THE EVENT OF A RELEASE OF A REPORTABLE QUANTITY GUARDIAN OR ITS REPRESENTATIVE WILL NOTIFY THE APPROPRIATE FEDERAL, STATE, AND LOCAL AGENCIES

6.1 Federal and State Agencies

National Response Center (Washington, D.C.)
Phone: (800) 424-8802 (24 hours)

Illinois Emergency Response Agency
Phone: (800) 782-7860 (in state)
Phone: (217) 782-7860 (out of state)

Wisconsin Department of Natural Resources
Spill Response and Support
Phone: (800) 943-0003

GUARDIAN PIPELINE EXPANSION AND EXTENSION PROJECT

ATTACHMENT 1

Response Team Contacts

Guardian Pipeline Project Response Team Contacts (To Be Completed Prior to Construction)[1/]	
Title/Position	**Phone/Pager Number(s)**
CONSTRUCTION CONTRACTOR SPILL COORDINATOR	
ENVIRONMENTAL INSPECTOR	
AUTHORIZED ALTERNATE (Contact only if you are unable to reach the EI)	
CONSTRUCTION CONTRACTOR SUPERINTENDENT	
CHIEF INSPECTOR	
OTHER GUARDIAN PIPELINE REPRESENTATIVES	
1	

[1] Guardian will provide an updated SPCC Plan complete with Response Team Contacts prior to Construction in 2007.

GUARDIAN PIPELINE EXPANSION AND EXTENSION PROJECT

ATTACHMENT 2

Spill Report Form

Guardian Pipeline Project
Spill Report Form

Date/time of spill: _____

Date/time of spill discovery:

_____

Name and title of discoverer:

_____

Milepost/Legal Description:

_____

_____

Material spilled/Estimated volume:

_____

_____

Unique qualifier, if relevant, such as manufacturer:

_____

_____

Media in which the release exists: (circle: sand, silt, clay, upland, wetland, surface water, other):

Topography and surface conditions of spill site:

_____

_____

_____

_____

Proximity to wetlands and surface waters (including ditches):

_____

_____

Proximity to private or public water supply wells:

_____

_____

Directions from nearest community:

_____

_____

Weather conditions at the time of release:

_____

_____

Describe the causes and circumstances resulting in the spill:

_____

_____

_____

_____

Describe the extent of observed contamination, both horizontal and vertical (i.e., spill-stained soil in a 5-foot radius to a depth of 1 inch):

_____

_____

_____

_____

Guardian Pipeline Project
Spill Report Form

Describe immediate spill control and/or cleanup methods used and implementation schedule:

_____

_____

_____

_____

Location of any excavated/stockpiled contaminated soil:

_____

_____

Describe the extent of spill-related injuries and remaining risk to human health and environment:

_____

_____

_____

_____

Name, company, and telephone number of party causing spill (*e.g.,* contractor):

_____

_____

_____

_____

Current status of cleanup actions:

_____

_____

_____

Name and company for the following:

Construction Superintendent:

_____

Spill Coordinator:

_____

Environmental Inspector:

_____

Chief Inspector (Guardian):

_____

Landowner notified (if appropriate):_____

Date:_____

Form completed by:

_____ Date: _____

Government agency notified **(to be completed by Guardian or Guardian's Representative)**:_____

Date: _____

Spill Coordinator must complete this form for any spill, regardless of size, and submit the form to the Guardian Representative and Environmental Inspector within 24 hrs of the occurrence.