

OVERLAND PASS PIPELINE PROJECT
SPILL PREVENTION, CONTAINMENT, AND COUNTERMEASURE
PLAN

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**OVERLAND PASS PIPELINE PROJECT
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 TABLE OF CONTENTS**

<u>Section</u>	<u>Page</u>
1.0 INTRODUCTION	1
2.0 PREVENTATIVE MEASURES	1
2.1 Training.....	1
2.2 Release Response Equipment	1
2.3 Equipment Inspection	2
3.0 REGULATED MATERIALS STORAGE AND HANDLING.....	2
3.1 Contractor Yards.....	2
3.2 Activities on the Construction Right-of-Way	4
3.3 Restricted Refueling Areas	4
3.3.1 Tracked Equipment.....	4
3.3.2 Stationary Equipment	5
3.4 Vehicle and Equipment Maintenance	5
4.0 SPILL RESPONSE.....	5
4.1 Spill Coordinator.....	6
4.2 Immediate Response	6
4.3 Wetland or Waterbody Response.....	6
5.0 REPORTING.....	7
6.0 NOTIFICATIONS	7
6.1 Federal and State Agencies.....	7
6.1.1 Federal	7
6.1.2 State	7

LIST OF TABLES

TABLE 1 Overland Pass Pipeline Project Typical Fuel, Lubricants, and Hazardous Materials	3
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ATTACHMENTS

- Attachment 1 Response Team Contacts
- Attachment 2 Spill Report Form

1.0 INTRODUCTION

Overland Pass Pipeline Company LLC (Overland Pass) has prepared this Spill Prevention, Containment and Countermeasure Plan (SPCC Plan), which is to be implemented during construction of the Overland Pass Pipeline Project. 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 Overland Pass right-of-way are responsible for implementation of the measures and procedures defined in this SPCC Plan. This SPCC Plan will be included in both the bid and the contract documents as contractual requirements and instructions to the contractor.

2.0 PREVENTATIVE MEASURES

Overland Pass will require that contractors minimize, to the extent practicable, the potential for and consequences of a spill during construction of Overland Pass' pipeline facilities. Overland Pass will require its 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

Overland Pass 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. Overland Pass 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 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, and the required spill containment supplies to be maintained with each construction crew. These weekly sessions will be held by the contractor as crew "tail gate" meetings. Overland Pass will audit Contractor compliance with this requirement to ensure the meetings are conducted.

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, Overland Pass will 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. Overland Pass will repair or replace leaking equipment immediately after a leak is detected.

3.0 REGULATED MATERIALS STORAGE AND HANDLING

3.1 Contractor Yards

Overland Pass will store fuel, petroleum products, and hazardous materials at the yards in a manner designed to protect the environment. Storage will be provided with secondary containment structures lined with an impervious material that provides a minimum containment volume equal to 110 percent of the volume of the largest storage vessel located in the yard. Overland Pass will 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 will be constructed with slopes no steeper than 3:1 (horizontal to vertical) to limit erosion and provide structural stability. Containment areas will not have drains.

Bulk storage tanks will not be placed in areas subject to periodic flooding or erosion. Accumulated rainwater may be removed if authorized by an Overland Pass Environmental Inspector (EI). If visual inspection indicates that no spillage has occurred in the containment structure and if approved by the 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.

Overland Pass will visually inspect aboveground bulk tanks frequently and whenever the tank is refilled. Drain valves on temporary storage tanks will be locked to prevent accidental or unauthorized discharges from the tank. Overland Pass will 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, will be accomplished at the contractor yards or staging area. Routine maintenance of track-mounted equipment will be conducted in a manner to gather oil and other discharges and remove them to a suitable recycling or disposal site.

Storage containers will 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 Overland Pass and be accessible to all contractor personnel.

Table 1 presents 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. Overland Pass will 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 Overland Pass employees.

TABLE 1				
Overland Pass Pipeline Project Typical Fuel, Lubricants, and Hazardous Materials (TO BE DETERMINED)				
Fluid Uses	Fluids	Typical Quantity Per Location	Method of Storage	Storage Location
Fuels	Diesel		Tanks or Tankers	Contractor Yard Warehouse/fuel vehicle parking areas
	Gasoline		Tanks or Tankers, 10-Gallon containers, Pick-up Tanks	Contractor Yard Warehouse/fuel vehicle parking areas
Lubricants	Engine Oil		Bulk Storage or Retail Packaging	Contractor Yard Warehouse
	Transmission/ Drive Train Oil		Retail Packaging on Service Trucks	Contractor Yard Warehouse, Service Trucks
	Hydraulic Oil		Bulk Storage or Retail Packaging	Contractor Yard Warehouse, Service Trucks
	Gear Oil		Retail Packaging on Service Trucks	Contractor Yard Warehouse, Service Trucks
Miscellaneous/ Coolants, Hydraulic fluids	Lubricating Grease		Tubes stored in Paper Cases	Contractor Yard Warehouse, Service Trucks
	Ethylene Glycol		Bulk Storage or Retail Packaging	Contractor Yard Warehouse, Service Trucks
	Propylene Glycol		Bulk Storage or Retail Packaging	Contractor Yard Warehouse, Service Trucks
	Power Steering Fluid		Retail Packaging on Service Trucks	Contractor Yard Warehouse, Service Trucks
	Brake Fluid		Retail Packaging on Service Trucks	Contractor Yard Warehouse, Service Trucks
	Propane		Pressurized Tanks	Contractor Yard Warehouse, Welding Trucks
Battery acids				
Solvents				

3.2 Activities on the Construction Right-of-Way

Overland Pass will undertake preventative measures to avoid environmental impacts from refueling and lubrication activities on the construction right-of-way.

On non-federal land, refuelling and lubricating of construction equipment will 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 refuelling and at the end of each work day. On federal land, refuelling and lubricating of construction equipment will be restricted to at least 500 feet of streams, wetlands, or water wells, unless a lesser distance is approved by the CM through the variance request process. Fuel and service truck drivers will be responsible for spill prevention during refuelling and service activities.

Fuels and lubricants will 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, on private lands no hazardous substances will be stored within 500 feet of streams, wetlands, or water wells, unless a lesser distance is approved by the CM through the variance request process. If fuel must be stored in these areas, refer to section 3.3 of this SPCC Plan. Overland Pass will confirm with the EI the locations of areas where these activities are prohibited prior to construction crews entering that area with equipment.

Overland Pass will maintain a minimum of 20 lbs. 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 (e.g., 100 feet from a wetland or waterbody, 200 and 400 feet from private and public water wells) 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 will be verified and approved by the EI prior to initiating such activity. Within these areas, the previously described fuel handling and refuelling procedures and the following procedures will also apply.

3.3.1 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 will be present during refuelling to reduce the potential for spills or accidents.

3.3.2 Stationary Equipment

Equipment such as non-portable, stationary pumps may be fitted with auxiliary tanks as appropriate. Such auxiliary tanks will be placed within a secondary containment structure. Refuelling of dewatering pumps, generators, and other small, portable equipment will be performed using approved containers with a maximum volume of 10 gallons. Fuel containers will be stored in an upland area at least 500 feet from wetlands and waterbodies. There will be instances that refuelling of stationary equipment will need to occur at less than the 500-foot setback. Overland Pass will work with the EI and CM to obtain a variance at these site-specific locations.

3.4 Vehicle and Equipment Maintenance

All routine vehicle and equipment maintenance on the right-of-way involving fluid replacement will 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 will be placed under the equipment to collect any spilled material. Overland Pass will 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, will 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 an EI and only with adequate containment.

4.0 SPILL RESPONSE

In the event of a spill, the release will 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.

There will typically be three tiers for a spill response, which include:

- Tier 1-Minor occurrence (equipment leak, leaking storage receptacle)
- Tier 2-Minor spill (spill of a reportable quantity that requires berm installation, absorbent material application, agency notification)
- Tier 3-Major spill (spill that poses an immediate threat to health and human safety which requires Spill Response Coordinator to activate notification and containment procedures outlined in Sections 4.2 and 6.0)

Reportable spills will be documented by the EI in coordination with the Spill Response Coordinator that documents the site of the spill. Documentation will include photos and/or soil/water samples as outlined in Overland Pass' permit stipulations, as required.

4.1 Spill Coordinator

Overland Pass, for each spread, will appoint a Spill Coordinator who will be responsible for the reporting of spills, coordinating contractor personnel for spill cleanup, subsequent site investigations, and associated incident reports. The Spill Coordinator will report to the EI and may be removed from that role by Overland Pass at its discretion. The Spill Coordinator, along with the EI, will be responsible for determining the extent of the spill containment and isolation area.

4.2 Immediate Response

ALL SPILLS, REGARDLESS OF SIZE, MUST BE REPORTED TO THE SPILL COORDINATOR AND OVERLAND PASS' EI

The person observing the incident will 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 the EI. Report your name, the spill location, and the extent of the incident.
4. Cordon off area.
5. Identify leak source and approximate size of spill (land affected and volumes spilled).
6. Estimate duration and age of spill.
7. Assess environmental and socioeconomic impacts.
8. If applicable, identify other nearby contaminated areas unrelated to construction project.

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

1. For an upland spill, if necessary, berms will be constructed with available equipment to physically contain the spill.
2. Absorbent materials will be applied to the spill area. Contaminated soils and vegetation will 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.
3. If a spill is beyond the scope of on-site equipment and personnel, an Emergency Response Contractor will 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 will 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 will 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 will be disposed of as soon as possible in accordance with appropriate state or Federal regulations.

5.0 REPORTING

With assistance from the EI, the Spill Coordinator is responsible for the completion of the Overland Pass 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 will be completed and submitted to an Overland Pass representative within 24 hours of the occurrence. An Overland Pass representative will notify the appropriate agencies (see section 6.0).

6.0 NOTIFICATIONS

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

6.1 Federal and State Agencies

6.1.1 Federal

National Response Center (Washington, D.C.)

Phone: (800) 424-8802 (24 hours)

6.1.2 State

Colorado

Toll-Free Environmental Emergency Spill Reporting Line

Phone: (877) 518-5608 (24 hours)

Wyoming

Emergency Response Coordinator

Phone: (307) 777-7781

Kansas

Kansas Department of Health and Environment

Phone: (785) 296-1679

Notification and reporting flow chart (to be determined)

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ATTACHMENT 1

Response Team Contacts

**Overland Pass Pipeline Project
Response Team Contacts
(To Be Completed Prior to Construction)**

Title/Position	Phone/Pager Number(s)
CONSTRUCTION CONTRACTOR SPILL COORDINATOR	
ENVIRONMENTAL INSPECTOR	
AUTHORIZED ALTERNATE (Contact only if you are unable to reach the Environmental Inspector)	
CONSTRUCTION CONTRACTOR SUPERINTENDENT	
CONSTRUCTION SUPERVISORS	
CHIEF INSPECTORS	
SAFETY SPECIALISTS	
OVERLAND PASS PROJECT MANAGER	

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ATTACHMENT 2

Spill Report Form

**Overland Pass Pipeline Project
Spill Report Form**

Date/time of spill: _____

Date/time of spill discovery: _____

Name and title of discoverer: _____

Name and title of person completing form: _____

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): _____

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 (Overland Pass):

Landowner notified (if appropriate):

Date:

Form completed by:

Date:

Government agency notified (to be completed by Overland Pass or Overland Pass' Representative):

Date:

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