Appendix D

SOUTHERN LNG AND EEC'S PROJECT-WIDE SPILL PLAN, WASTE MANAGEMENT PLAN, AND CONTAINER MANAGEMENT POLICY

SOUTHERN NATURAL'S /ELBA EXPRESS COMPANY

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- **WASTE MANAGEMENT PLAN, Pages 7 - 11**
- **CONTAINER MANAGEMENT POLICY, Page 12**

SPILL PLAN

PREVENTATIVE MEASURES

The spill prevention and control methods listed in this section are based on approved spill control plans that Southern has used successfully in the past. This plan is comprehensive in that it addresses actions used to prevent spills in addition to specifying actions that will be taken should any spills occur, including emergency notification procedures. The Project's on-site EI's are responsible for ensuring that contractors implement and maintain spill control measures.

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.

Equipment Inspection/Maintenance

The Contractor will inspect and maintain equipment that must be fueled and/or lubricated according to a strict schedule. The Contractor will submit to Southern 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 and/or repaired.

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) 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:
    a. dikes, berms or retaining walls sufficiently impervious to contain spilled oil;
    b. sorbent and barrier materials in quantities determined by the Contractor to be sufficient to capture the largest reasonably foreseeable spill;
    c. drums or containers suitable for holding and transporting contaminated materials;
    d. curbing;
    e. culverts, gutters, or other drainage systems;
    f. weirs, booms, or other barriers;
    g. spill diversion or retention ponds; and
    h. sumps and collection systems.
- All spills will be cleaned up immediately. Containment equipment will not be used for storing contaminated material.

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.

Personnel Support

Prior to construction, the ROW inspector or agent shall identify and prepare a written inventory of water wells within 200 feet of the construction site. The construction ROW agent will notify the authorities of all potable water supply intakes located within three miles downstream of any crossings a minimum of one week prior to construction.

SPILL RESPONSE MEASURES

Containment is the immediate priority in the case of a spill. A spill will be contained on Southern'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 notify the EI, construction supervisors, and Division contacts immediately. The following contacts are currently assigned to the Project and are subject to change:

Elba III Terminal Expansion Project
SNG - Project Environmental Coordinator –
Jason M. Goldstein 205-325-3879 (wk) 205-873-0701 (cell)
SNG - Environmental Compliance Dept. –
Tim McKellar 205-325-7684 (wk) 205-907-4843 (cell)
National Response Center: 800.424.8802
Georgia Emergency Response Center Toll free at: 1-800-241-4113

Elba Express Pipeline
EEC – Project Environmental Coordinator –
Stephen Weems 205-521-6084 (wk) 205-937-5674 (cell)
EEC – Environmental Compliance Dept. –
Kelley Beavers 205-325-3784 (wk) 205-936-2364 (cell)
EEC – Savannah Locations Contact
Mike Prestage – 912-748-2945
National Response Center: 800-424-8802
Georgia Response Center: 800-241-4113
Emergency Response Contractors:
Ferguson-Harbour, Atlanta, GA: 800-235-3224
Moran Environmental Recovery, Savannah, GA: 912-232-3224

If a spill enters a body of water, the Contractor will immediately take samples upstream and downstream from point of entry and refrigerate samples. If advised, additional analysis will be completed and/or additional samples will be gathered.

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 materials' 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 Division Compliance Specialist approves it in writing.

- The Contractor will prepare a Construction Site Spill Report form to be given to the EI that includes:
    a. the date, time and location of the occurrence;
    b. a description of the material spilled;
    c. the quantity spilled;
    d. the circumstances that caused the spill;
    e. a list of waterbodies affected or potentially affected by the spill;
    f. a statement verifying whether a sheen is present;
    g. the size of the affected area;
    h. an estimate of the depth that the material has reached in water or on soil;
    i. a determination of whether the spill will migrate off of Southern's property or the ROW;
    j. a determination of whether the spill is under control;

k. a statement verifying that clean-up has begun and a description of the methods being used to clean up the spill; and
l. 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 and/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.

Terrestrial Construction

General equipment that Southern 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.

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.

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).

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.

Waterbody and Wetland 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 water or wetland to minimize response time, and will include:

- oil containment booms and the related equipment needed for rapid deployment, and

equipment to remove oils from water, such as oleophilic and hydrophobic absorbent booms and mats, and/or mechanical skimmers.

SPILL REPORT FORM

IT IS MANDATORY THAT YOU COMPLETE ALL BLANKS & FILL IN ANY BLANKS THAT DO NOT APPLY WITH "N/A"

Name: _____
Date/Time: _____

LOCATION

MP/St.#: _____
Tract ID: _____
Weather:_____ GroundCond.:_____
Nearest Wetland:_____Wetland ID/Dir/Dist:_____
Nearest Waterbody:_____WaterbodyName/Dir/Dist:_____

- ***Spills in Wetlands/Waterbody CALL Nation Response Center Within 1 hour!!!!! (See Contacts at bottom of page)***
- ***If spill is hazardous material or dangerous to the environment call MS Responses Center & Emergency Contractor***

SUBSTANCE SPILLED / RELEASE

Check All That Applies: Diesel:_____ Oil:_____ Transmission:_____
Gasoline:_____ Hydraulic:_____ Other:_____

CAUSE OF SPILL / RELEASE

_____
_____
_____

RECEIVING MEDIUM (WATER, LAND, PAVED SURFACE, ETC. … GIVE SPECIFIC INFO WHERE APPLICABLE)

_____
_____

REMEDIATION DESCRIPTION (WHAT WAS DONE)

_____
_____
_____

DISPOSAL

Container Type: Bag: [ ] Barrel: [ ] Drum: [ ] Other: [ ]
Disposal Location: Yard: [ ] Other: [ ] If Other: _____

NOTIFICATION

Spill Reported To: _____

Reported Date/Time:_____

SNG – Project Environmental Coordinator –
Jason M. Goldstein (205) 325-3879 wk, (205) 873-0701 cell
SNG – Environmental Compliance Dept. – Tim McKellar (205) 325-7684 wk, (205)-907-4843 cell
SLNG – Emergency Coordinator – Garnasia Bogus (912) 944-3819 wk, (912) 507-6322 cell, (912) 966-2739
National Response Center: 800.424.8802
Georgia Emergency Response Center
Toll free at: 1-800-241-4113

ELBA EXPRESS COMPANY – ELBA EXPRESS PIPELINE PROJECT

SPILL REPORT FORM

IT IS MANDATORY THAT YOU COMPLETE ALL BLANKS & FILL IN ANY BLANKS THAT DO NOT APPLY WITH "N/A"

Name: _____
Date/Time: _____

LOCATION

MP/St.#: _____
Tract ID: _____
Weather:_____ GroundCond.:_____
Nearest Wetland:_____Wetland ID/Dir/Dist:_____
Nearest Waterbody:_____WaterbodyName/Dir/Dist:_____

- ***Spills in Wetlands/Waterbody CALL Nation Response Center Within 1 hour!!!!! (See Contacts at bottom of page)***
- ***If spill is hazardous material or dangerous to the environment call MS Responses Center & Emergency Contractor***

SUBSTANCE SPILLED / RELEASE

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RECEIVING MEDIUM (WATER, LAND, PAVED SURFACE, ETC. … GIVE SPECIFIC INFO WHERE APPLICABLE)

_____
_____

REMEDIATION DESCRIPTION (WHAT WAS DONE)

_____
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DISPOSAL

Container Type: Bag: [ ] Barrel: [ ] Drum: [ ] Other: [ ]
Disposal Location: Yard: [ ] Other: [ ] If Other: _____

NOTIFICATION

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EEC – Project Environmental Coordinator – Stephen Weems 205.521.6084 wk 205.937.5674 cell
EEC – Environmental Compliance Dept. – Kelley Beavers 205.325.3784 wk 205-936.2364 cell
EEC – Savannah Locations Contact – Mike Prestage – 912-748-2945
National Response Center: 800.424.8802
Georgia Response Center: 800.241.4113
Emergency Response Contractors: Ferguson-Harbour, Atlanta, GA: 800.235.3224
Moran Environmental Recovery, Savannah, GA: 912.232.3224

WASTE MANAGEMENT

The following information is to be used as a Contractor's guidance tool when generating wastes on a project and to assist the Contractor in developing a waste management plan, which must be submitted to the company before the project begins.

Waste Identification and Characterization

Identifying Wastes

Wastes may be grouped into four categories, each requiring different forms of disposal: hazardous waste, non-hazardous waste, special waste, and universal waste.

- **Hazardous wastes** - Wastes that meet one of the criteria of ignitable, corrosive, reactive, toxic, or is specifically listed as hazardous waste by regulation. These wastes require special handling and disposal.

- **Non-hazardous wastes** - Wastes that do not fall into the other categories. This includes general trash.

- **Special wastes** - Wastes that do not meet the criteria for hazardous wastes, but may present special hazards or require special handling. Examples of special wastes are asbestos, polychlorinated biphenyls ("PCBs"), radioactive waste, and naturally occurring radioactive material ("NORM"). It's important to note that some states have their own classification of special wastes.

- **Universal wastes** - To reduce the amount of hazardous waste in municipal solid waste streams, the Environmental Protection Agency ("EPA") and many states recognize batteries, thermostats and lamps, e.g., fluorescent light bulbs, as "universal" and thus allow easier handling of these wastes.

Waste Characterization

The Environmental Inspector ("EI") shall coordinate with the Field Environmental Representative and/or Compressor Station personnel to determine if existing waste profiles exist for wastes generated during construction. These locations maintain waste profiles that list the characterization results of various wastes. If the classification of a waste is unknown, the waste must be characterized using test results or knowledge of the process generating the waste to determine the proper handling requirements for that waste. The EI shall coordinate with the Field Environmental Representative and Contractor to determine the type of waste and the party responsible for proper disposal. The information below is used to characterize a waste.

- Source of the waste.

- Material Safety Data Sheets ("MSDS") for materials comprising the waste.

- Laboratory results from waste testing, as applicable.

Contact the Field Environmental Representative for waste characterization and sampling instructions if no existing waste profile exists.

Prior to waste characterization a number of general guidelines shall also be adhered to when handling or storing wastes.

- Ensure that the Contractor's Environmental Guidelines in the contract are followed.
- Ensure that the Contractor provides a list to the Company and EI of all hazardous materials or potential contaminants that are to be used or stored on the project site.
- DO NOT bury any wastes. This includes stumps, rocks, or boulders unless approved by the Company or EI per the FERC's (Southern's) Plan and Procedures found in the Environmental Compliance Manual.
- Never mix any waste awaiting characterization with other wastes.
- Never ship any waste unless it has been characterized.
- Never ship any hazardous waste from the job site to a compressor station without prior approval from the Field Environmental Representative and compressor station.
- Ship wastes along with the required manifests only to company-approved facilities.
- Never ship drums of waste to a compressor station without prior approval from the Field Environmental Representative and the compressor station.

Waste Types

Hazardous Waste
Common wastes include, but are not limited to: pipeline sludge, spent pigs, sandblast abrasive (depending on type and use), MEK, paint thinner, and solvents.

The following procedures apply to storage of waste determined to be hazardous for all classes of generators:

- Store hazardous wastes using the Department of Transportation ("DOT") approved containers, a frac tank (bulk liquid wastes), a covered steel roll-off container with a poly-liner (bulk solid wastes like contaminated soil), or on a thick poly-liner and provide the area with a poly-liner cover and temporary containment berm (bulk solid wastes).
- When using DOT-approved containers, be sure the containers are kept closed or sealed (except when waste is being added), maintained in good condition (not damaged, leaking or corroded) and store compatible substances that will not react with the hazardous waste. For example, store acidic wastes in plastic or plastic-lined containers rather than steel containers.

- Label hazardous waste containers (drums, tanks, roll-off containers) with a hazardous waste label as soon as any hazardous waste is placed into the container. Use a waterproof pen to complete the following information on the label:

    - Generator name, address, and phone number.
    - Generator EPA identification number.
    - Description of waste (contact the Field Environmental Representative to obtain a waste description).
    - The 4-digit EPA waste code (the Field Environmental Representative will provide EPA waste codes).
    - Accumulation date (the date the waste was added to the container, if not from satellite storage, or the date it was brought to the waste storage area from a satellite accumulation area).

- Label waste piles with a weatherproof sign identifying the waste and the date the waste pile was started. Waste piles are to be placed on poly-liner, covered to protect them from weather, and surround with barricade tape.

- Store hazardous waste in a designated hazardous waste storage area (or in a designated satellite accumulation area at a minimum of 20 feet from the edge of the Certificated ROW edge) that is covered or protected from the weather; has an impermeable floor, surrounded by curbing or use spill pallets; and is more than 50 feet away from the SNG facility property line if ignitable or reactive hazardous waste is stored in the area.

<u>Manage the hazardous waste storage areas as follows:</u>

- Identify as hazardous and non-hazardous waste appropriately.

- Arrange the containers by waste type, keeping similar hazardous wastes together.

- Separate any incompatible waste by a dike, berm, wall, or other containment device.

- Turn containers so labels may be read easily and ensure that enough isle space is left between drums to inspect for leaks and to gain access to respond to spills or fire.

- Handle waste containers carefully to prevent rupture or leaks, and protect containers from extreme temperatures.

- Large Quantity Generators and in some states Small Quantity Generators must have a contingency plan, make weekly inspections of hazardous wastes, and provide specific training to personnel.

- Hazardous waste can only be disposed at approved facilities. Contact the Field Environmental Representative for a list of approved facilities.

Non-Hazardous Waste

Common wastes include, but are not limited to: oily rock/soil, oily rags, sandblast abrasive (depending on type and use), and general trash/garbage.

- Turn containers so labels may be read easily.

- Non-hazardous waste is waste that has not been found to be hazardous through testing or by generator knowledge but has special transportation and disposal requirements, which may include State permitting and approvals.

- Store non-hazardous wastes using one of the following methods:

    - In DOT-approved containers.
    - In a frac tank (bulk liquid wastes).
    - In a covered steel roll-off container with a poly-liner (e.g., bulk solid wastes like contaminated soil or used sandblasting abrasive).
    - On a thick poly-liner and provide the area with a poly-liner cover and temporary containment berm (bulk solid wastes).

- When using DOT-approved containers, be sure the containers are:

    - Kept closed or sealed (except when waste is being added).
    - In good condition (not damaged, leaking or corroded).

- Label non-hazardous waste containers (drums, tanks, roll-off containers) with a non-hazardous waste label identifying the contents as soon as waste is placed into the container.

- Store non-hazardous waste segregated from hazardous waste storage or satellite accumulation areas.

- Non-hazardous waste can only be disposed at approved facilities. Contact the Field Environmental Representative for a list of approved facilities.

Some States allow sandblast sand to be left in the ditch if sandblasting bare pipe only. Contact the Project Environmental Coordinator to verify if this type of activity may occur.

Special Wastes (Asbestos)

Check with the Project Environmental Coordinator to determine if there are any additional <u>state-specific</u> requirements that may apply.

- If the Contractor subcontracts the handling of Asbestos Containing Material (ACM) to a Certified Asbestos Abatement Contractor, Southern will need to retain copies of the Abatement Contractors Certification, Competent Person and other personnel's Training Documentation, and Physicians letter allowing those persons to perform ACM work. Southern will also require a copy of the ACM Disposal Manifests for Company records.

  OR

- The Contractor will follow their Asbestos Management Plan which has been submitted to Southern's ES&H Department and has been verified by the Company's Safety Department.

Universal Waste

Common wastes include, but are not limited to: batteries, thermostats, and fluorescent light bulbs.

- If any universal waste is generated during construction, contact the Field Environmental Representative for storage and disposal instructions.

Container Management Policy

Applicability: This policy applies to all containers used to:

1. Accumulate non-hazardous, non-regulated waste.
2. Accumulate hazardous waste (RCRA).
3. Accumulate hazardous substances (SARA/CERCLA) or toxic substances (TSCA).
4. Store products of 1 gallon container size or larger.

All containers used to accumulate **non-hazardous, non-regulated waste and store products** must be:

1. Marked or labeled clearly to identify their content.
2. Maintained in good condition to prevent leaks or spills.
3. Placed in an area that is protected from weather (i.e., tarps, tents, covers, inside trailer size containers).
4. Arranged so that there is sufficient aisle space between containers.
5. Placed inside secondary containment at a minimum of 110% storage capacity regardless of product quantity.

All containers used to accumulate **hazardous waste, hazardous substances or toxic substances** (regardless of size or quantity) must be:

1. Marked or labeled clearly to identify their content in accordance with the appropriate regulations.
2. Maintained in good condition to prevent leaks or spills.
3. Placed inside impervious secondary containment.
4. Placed at least 20 feet from the edge of the Certificated ROW.
5. Closed and secure at all times except when removing or adding materials.
6. Arranged so that there is sufficient aisle space between containers.
7. Placed in an area that is protected from the weather.
8. Placed inside portable containment when permanent containment is not feasible.
9. Inspected weekly at a minimum or at frequency in accordance with the appropriate regulations.

NOTE: Containers used to accumulate hazardous waste must be marked or labeled with the words “Hazardous Waste” and an accumulation start date.

All **empty 55 gallon drums** must be:

1. Maintained in good condition.
2. Marked or labeled as being “Empty.” (all old labels should be removed or erased).
3. Stored on their sides, off of the ground and protected from the weather (where feasible).
4. Crushed and properly disposed if not to be reused within six months.