



APPENDIX M

Materials Handling Work Plan



**MATERIALS HANDLING WORK PLAN
FOR
PILGRIM PIPELINE PROJECT
CONSTRUCTION & INSTALLATION**

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1.0 PROJECT DESCRIPTION AND SITE LOCATION

The Pilgrim Pipeline Project consists of the installation of two mainline pipelines in a single trench. The mainline route extends approximately 116 miles from the City of Albany, primarily along the New York State Thruway (NYS Thruway) to the Rockland County / Bergen County line at the New York / New Jersey state line and continuing for another 54 miles in New Jersey before terminating in the vicinity of Linden, Carteret and Port Reading, New Jersey. The New York State segment includes the mainline route and its laterals. The New York State segment extends approximately 116 miles from the City of Albany, primarily along the New York State Thruway (NYS Thruway) to the Rockland County / Bergen County line at the New York / New Jersey State line.

1.1 PURPOSE

The purpose of this Materials Handling Work Plan (“the Plan”) is to address the management of contaminated soil, hazardous materials, spills, and/or groundwater. The Plan assumes contaminated material encountered during the course of the pipeline installation was not caused by Pilgrim or its subcontractors but is a residual artifact of some previous activity. Spills caused by construction activities will be addressed in accordance with Section 8.0 of Pilgrim’s Stormwater Pollution Prevention Plan (SWPPP).

The plan will address all activity created by the construction of this pipeline and associated work.

1.2 PIPELINE PROJECT INSTALLATION PROCEDURES

The Project will be constructed in compliance with applicable federal and state regulations and guidelines, and specific requirements of permits and approvals. Trench backfill will be from existing excavated material. The backfill will be screened, and rocks smaller than 1.5” in diameter, along with accompanying fines, will be placed around the pipe for a minimum of 6”. Rocks 4 inches in diameter or smaller will be used for backfill. Larger rocks will be disposed of along the right-of-way in areas that need stabilizing or will be hauled to designated sites, such as quarries. In areas of shot rock that offer no fines, padding material will be hauled in.

2.0 CONTAMINANT IDENTIFICATION

2.1 SOILS

Contaminated soil is an industrial waste and requires disposal at municipal/commercial disposal facilities (such as sanitary landfills), reclamation facilities, or at specialized facilities for the type

of contamination present. The potential for contaminated soil to be a hazardous waste due to characteristics such as flammability or toxic metal content must also be considered. All suspected hazardous materials, petroleum contaminated soils, and/or sediments will be evaluated by a New York State licensed professional engineer, as defined at 6NYCRR 375-1.2(aj) and paragraph 1.3(b)47, or a site qualified environmental professional (EP) as defined in 6NYCRR 375-1.2(ak) and paragraph 1.3(b)49. If it is suspected that soil or sediment is contaminated, contact the site EP to investigate and evaluate the material to determine a course of action. Soil or sediment may be contaminated if it is discolored or stained, or smells like fuel or sewage.

Soils exposed during open trenching will be visually and olfactory observed for signs of staining or odors to determine whether there are signs of contamination. Possible contaminants include petroleum products, observable hazardous substances, or other volatile contaminants. Soil will be evaluated for potential contamination by the EP by measuring and recording their volatile content with a Photo Ionization Detection (PID) meter. PID readings in excess of 100 ppm above background will be considered contaminated for the purposes of this plan.

2.2 HAZARDOUS MATERIALS

If excavated material is determined to be hazardous, it must be segregated on an impervious liner and covered. Construction workers will be immediately notified and all appropriate actions taken in accordance with the site Health and Safety Plan.

2.3 PETROLEUM SPILL REPORTING

Spills of petroleum products (gasoline, fuel, used oil, etc.) are required to be reported to the NYSDEC Spills Hotline unless they meet **all** of the following criteria:

- Less than five (5) gallons is spilled and the spill is contained and under the control of the spiller;
- It is cleaned up within 2 hours of discovery; and
- The spilled material does not reach and contaminate any land, surface or ground water.

By virtue of the third bullet, most if not all petroleum contaminated material that is exposed will be reportable.

2.4 CHEMICAL SPILL REPORTING

Spills of regulated chemicals must be reported to the NYSDEC Spills Hotline (1-800-457-7362) and the National Response Center ((800) 424-8802) if the spill reaches or exceeds the listed “reportable quantities”. The reportable quantity (RQ) pertains to the quantity of the specific chemical released; the quantity of the chemical within a release of a mixture or product should be estimated to determine if the RQ was exceeded. (For example, the quantity of methanol released in a 100 pound release of concrete sealant (approximately 15 gallons) containing 22% methanol is 22 pounds).

Many of these RQs are quite large in comparison to the quantities that are typically used in most activities; thereby exceeding the federal RQ for those chemicals is not likely.

NYSDEC also requires reporting (to the NYSDEC Spills Hotline) of releases that could impact land and water at lower reporting thresholds. The following table includes the federal RQs (49 CFR 172.101) and NYSDEC RQs to land/water (6NYCRR Part 597) for chemicals present in appreciable quantity in common products:

Chemical/Typical Product where present	Federal RQ (lb)	NYSDEC water/land RQ (lb)
Ethylene Glycol (antifreeze)	5000	1
Hydrochloric Acid (muriatic acid)	5000	100
Lead compounds (Lead paint removal waste from bridge rehabilitation)	10	10
Methanol (paints, sealants)	5000	1
Styrene (polyester paints)	1000	1
Sulfuric Acid (batteries)	1000	100
Toluene	1000	1
Xylene	100	1

Chemicals such as isopropanol, calcium chloride, magnesium chloride, most herbicides (including Escort, Krenite, Oust, Rodeo, and Roundup), propylene glycol, ethanol, and salt present in common activities are not regulated and do not have reportable quantity notification requirements. Many chemicals are not listed, but this does not mean they are harmless and they still require appropriate cleanup.

The federal Chemical Spill Reporting Requirements are listed in EPA regulations, 40 CFR Part 302.4, “Designation, Reportable Quantities and Notification” (the reportable quantities are also included in Appendix A of the USDOT regulation 49 CFR part 172.101 (Hazardous Materials

Table)). NYS includes chemical spill reporting requirements in the Chemical Bulk Storage Regulations, 6NYCRR Parts 595-598

2.5 MATERIAL HANDLING OF NON-HAZARDOUS CONTAMINATED SOILS

Soils which meet the above criteria will be documented by noting the location (pipeline mile point), the PID reading, and if it meets the reporting criteria (see below) as evaluated by the site EP, he/she will call the NYSDEC Spill Hotline at (800) 457-7362 within 2 hours of discovery and report the findings.

When excavated contaminated soil is encountered during construction, the material will be documented, segregated and tested. The appropriate regulatory agencies such as the NYSDEC will be notified. Dependent on the significance of contamination (e.g., saturated soil or free product), materials discovered in the course of utility line construction may be reused as trench backfill or be disposed of at fully licensed and permitted disposal facilities in accordance with applicable federal and state laws and regulations.

If the material in question is not returned as backfill, the utility contractor may do either of the following:

- a) Bring the material to a permitted landfill using a licensed Part 364 hauler, or
- b) Segregate the material on an impervious liner and notify the NYSDEC region with jurisdiction.

The mainline route will pass through NYSDEC Region 3 and Region 4.

Region 3, (845) 256-3137, is comprised of seven (7) counties: Dutchess, Orange, Putnam, Rockland, Sullivan, Ulster, and Westchester

Region 4, (518) 357-2045, is comprised of nine (9) counties: Albany, Columbia, Delaware, Greene, Montgomery, Otsego, Rensselaer, Schenectady, and Schoharie.

2.6 MATERIAL HANDLING OF HAZARDOUS SOILS

Hazardous spills/materials have the potential to expose people and contaminate the environment. The recommended procedures and risks change with the circumstances of each spill. However, the following general procedure can be used for most on-site discovery of hazardous materials as applicable:

- Inform and remove unnecessary employees from the area;
- Determine the identity and hazards of the material and any personal protective equipment such as impermeable gloves required for handling;
- If the spilled material is flammable, remove any open flames or sources of ignition. Use non-sparking tools and grounding wires if needed;
- Stop additional material from being exposed if possible. For example, stop excavating and cover the affected area to reduce exposure;
- If the material is in a liquid form contain it by placing absorbent "socks" or sand to prevent it from running into storm drains, bare soil, large surface areas, etc.;
- Collect smaller quantities and/or remaining liquid by absorbing liquid with absorbents or sand. Gently scoop or sweep up the residue and place in empty container (drum); and
- Label all containers of spill collection and debris as soon as possible.

Note: Always be careful about exposing anyone to hazardous vapors/fumes that can be inhaled or from skin and eye contact. Do not try to clean up spills of unfamiliar materials if you don't have adequate hazard communication information.

2.7 MATERIAL HANDLING OF CONTAMINATED WATER

In the course of the pipeline installation, there are situations where surface water or groundwater may be encountered. Absent testing, groundwater contamination is typically assessed by observing whether the water has an odor, a sheen or other discoloration. These conditions and their locations shall be documented by the on-site EP and the NYSDEC Regional Office shall be notified.

If a trench containing contaminated water/groundwater requires dewatering, the contaminated water will be pumped into a vacuum truck or a stationary Frac tank. Unless directed otherwise by the NYSDEC, contaminated water shall be disposed of at a regulated facility by a permitted hauler. For the purposes of this Work Plan, and unless proven otherwise, all water suspected or proven to be contaminated, and collected by a vacuum truck and/or Frac tank, will be disposed of as contaminated waste at a regulated facility. The material will be sampled and analyzed as required by disposal facility protocols.

2.8 WASTE TRANSPORTER PERMITS

A contractor without a permit, by regulation can haul up to 500 pounds of industrial wastes, including petroleum-contaminated soil and materials, used oil and tires in a single shipment. Hazardous wastes from a conditionally exempt small quantity generator (<100 kg/month) may also be self-transported without a permit. A "Part 364" Waste Transporter Permit issued by the NYSDEC is required to haul larger quantities of petroleum-contaminated soil and materials, hazardous wastes and industrial wastes such as used tires. Information on permit requirements or applications can be obtained by calling the NYSDEC's Division of Compliance Services at (518) 402-8707.

2.9 SOIL CUTTINGS AND BENTONITE SLURRY GENERATED BY HDD

Prior to any HDD activity where the length across waterways exceeds 100 feet, borings will be taken at the entrances and exits of the drill holes to determine if any contaminated soil will be encountered. Any contaminated soil encountered during drilling will be disposed of by hauling to an approved site.

3.0 REPORTING

Any soil analytical results required by the NYSDEC will be transmitted to the Department within (60) days of receipt of such results.