INTEGRATED CONTINGENCY PLAN
(ICP)

Newington Energy
200 Shattuck Way
Newington, New Hampshire

FRP Number - FRP01A0241

December 2007

Ref. No. 102692 ICP

Prepared for:

General Electric Contractual Services
Newington Energy
200 Shattuck Way
Newington, NH 03801

Prepared by:

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1.0 SECTION I - PLAN INTRODUCTION ELEMENTS

1.1 Purpose and Scope of Plan Coverage

This Integrated Contingency Plan (ICP) has been developed for the Newington Energy, LLC (NEL) facility located in Newington, New Hampshire. This ICP has been developed primarily to allow the company and facility personnel respond to emergency incidents that may occur during operations.

This ICP has been developed for General Electric Contractual Services (GECS). GECS is under an Operations and Maintenance (O&M) contract to operate and maintain this facility for NEL. GECS will have personnel on site full time and NEL will have a representative dedicated to the site, but will only be on site on an as needed basis.

The nature and complexity of the regulations that pertain to this, and other facilities, has prompted The National Response Team's position on the use of an ICP or "One Plan". "The use of a single emergency response plan per facility will eliminate confusion for facility first responders who often must decide which of their plans is applicable to a particular emergency. The "One Plan" is designed to yield a highly functional document for use in varied emergency situations while providing a mechanism for complying with multiple agency requirements. Use of a single integrated plan should also improve coordination between facility response personnel and local, state, and federal emergency response personnel." NEL is required to participate in a number of Federal, State and Local programs based on the nature of the hazards associated with the operation of this type of a facility. Some of these hazards include:

- Storage and use of > 10,000 pounds of Anhydrous Ammonia;
- Storage and use of > 1,000,000 gallons of #2 fuel oil; and
- Close proximity to a navigable waterway.

The concept of the EPA "One Plan" was to develop a format for a comprehensive plan to incorporate emergency response requirements into one document. Based on operations at NEL, this ICP has been developed in writing to meet the emergency response requirements for the following regulations:

- EPA's Oil Pollution Prevention Regulation (SPCC and Facility Response Plan (FRP) Requirements) - 40 CFR part 112.;
- EPA's Risk Management Programs Regulation - 40 CFR part 68;
- EPA's Hazardous Waste Contingency Plan 40 CFR 265 (New Hampshire incorporates the Federal Requirements at Env-Wm 509.02)
- OSHA's Emergency Action Plan Regulation - 29 CFR 1910.38(a);
- OSHA's Process Safety Standard - 29 CFR 1910.119; and
- OSHA's HAZWOPER Regulation - 29 CFR 1910.120.

This ICP has been developed to include modified regulatory requirements for SPCC plans as specified in the updated regulations issued July 17, 2002. This ICP has been designed to conform with the requirements specified in 40 CFR 112.7 for SPCC planning. The plan has been developed to not deviate from the requirements established in 40 CFR 112.7 for an SPCC.

To meet the various compliance and emergency response planning needs, the ICP is structured as follows:

Comprehensive – This single document is comprised of sections which have been prepared to meet multiple regulatory program requirements as well as existing company policies and emergency response procedures. The sections are cross-referenced to the regulatory program requirements to facilitate agency review of this document.

Functionally organized – The ICP has been prepared to meet the operating needs of facility personnel and emergency responders. Therefore, the information presented in this plan has been organized on this basis. The regulatory cross-references identify how this functional order meets the various regulatory program requirements.

Usable for emergency response – Section II of this ICP has been structured to exist as a separate document that may be used to actively respond to an emergency incident (Emergency Response Action Plan (ERAP)). Section II contains the most critical information to respond to an emergency incident, including:

- Emergency Phone Number;
- Discussion of Response Activities; and
- Specific Emergency Procedures (ERP-00 through ERP-010).

"User friendly" for training purposes – GE conducts training programs for facility personnel as necessary to ensure that its emergency response program is fully understood by the facility personnel that are responsible for emergency response actions. This will be better accomplished using a consolidated and simplified document to meet multiple regulatory training requirements.

Easily updated – Given the wide array of regulatory programs that affect this facility, it is imperative that the plan allow for both proper documentation and record keeping, as well as easy updating (and/or revisions) necessary to meet regulatory requirements. To facilitate this process, the ICP uses features such as a single section (or table) for the necessary telephone numbers required by the numerous regulatory programs. In addition, a "responsibility matrix," has been included that identifies personnel that are responsible for making necessary updates/revisions to ensure regulatory program compliance.

This plan will address at a minimum the following potential emergency situations through the use of Emergency Response Procedures (ERP's). These ERP's are the basis for GECS's response to these types of situations and are included in Section II of this ICP. Each ERP follows a similar pattern of response, resources and roles and responsibilities with variations based on the needs/challenges of the particular situation. The ERPs pertinent to the facility include:

- Incident Discovery
- Incident Assessment
- Medical Emergency Procedure
- Emergency Evacuation Procedure
- Fire and/or Explosion Procedure
- Oil/Hazardous Material Spill/Release Procedure
- Security Disturbance/Bomb Threat Procedure

- Utility Failure Procedure
- Severe Weather Procedure
- Anhydrous Ammonia Emergency Procedure
- Civil Strife and Sabotage/Terrorism Threat Procedure

1.2 Table of Contents

Refer to the Table of Contents for this document (page i.).

1.3 Current Revision Date

This facility is newly constructed and is scheduled for Commercial Operation in 2002. The table below provides a location for future revisions to be documented.

Revision #	Revision Date	Nature of Revision	Affected sections	Approvals

1.4 General Facility Identification Information

Facility Description

The NEL Power Project is a 525 MW gas fired combined cycle power plant located at 200 Shattuck Way in Newington, NH. The facility is located approximately 1000 feet from the Piscataqua River in a mixed zone area. The NEL Facility is to be owned and operated as a merchant power facility using state-of-the-art technology and environmental controls that provide extremely high operational efficiency and low air emissions. Through the use of natural gas and low sulfur number 2 distillate, as a backup fuel the facility will generate enough power to supply 700,000 homes in New England.

1.4.a Facility Name

Newington Energy, LLC

1.4.b Owner/operator/agent

Owner

Newington Energy LLC
111 Broadway 16thFloor
New York, NY 10006
Phone – 212-393-9242
Fax – 212-393-9282

Operator

General Electric Contractual Services
200 Shattuck Way
Newington, NH 03801
Phone # 603-766-1883, 1880, 1885, 1887 (No central switchboard at this time)
Fax 603-766-1886

Phone numbers for key facility contacts (including Qualified Individual) are located in the beginning pages of Section II of this ICP.

1.4.c Physical Address of the Facility

Latitude: 43-06-17.41
Longitude: 070-48-16.49
200 Shattuck Way (Once Industrial Corridor Road is complete address will change)
Rockingham County
Newington, NH 03801

1.4.d Mailing Address of the Facility

200 Shattuck Way (Once Industrial Corridor Road is complete address will change)
Rockingham County
Newington, NH 03801

1.4.e Other Identifying Information

- National Pollutant Discharge Elimination System (NPDES) – NH0023361
- Energy Facilities Site Evaluation Committee (EFSEC) – SEC Docket 98-01
- Prevention of Significant Deterioration (PSD) – 044-121NH10
- Wetlands and Waterways – 199801919

- Federal Aviation Administration (FAA) Stack Permit # 98-ANE-0336-OE
- Coastal Zone Management (CZM) Found in EFSEC SEC Docket 98-01
- Town Of Newington Sewer Permit # 2
- 401 Water Quality – In EFSEC SEC Docket 98-01
- Dun and Bradstreet Numbers - 022934678 & 023647246
- SIC - 4911 - Electric Services
- NAICS - 221112 - Electric Power Generation
- Wellhead Protection Area - Not Applicable
- Largest Oil Storage Tank Capacity: 939,451 Gallons
- Maximum Oil Storage Capacity: 1,015,942
- Number of Oil Storage Tanks: 22
- Worst Case Discharge Amount: 939,451 gallons (22,368 barrels)
- Facility Distance to Navigable Waters: 500 ft. (less than 1/4 mile)
- Oil Storage Start-up Date: October, 2002

1.4.f Key Contacts

Thomas Fallon – GECS Facility Manager
Dave Argyros – GECS Site EH&S Manager
Chad Harrison – GECS Operations Manager

1.4.g Phone Numbers for Key Contacts

Name	Position	Work Phone	Cell Phone	Home Phone
Fallon, Thomas	Facility Manager	603-766-1880	603-767-3575	207-384-4857
Argyros, Dave	EH&S Manager	603-766-1880	603-531-9779	603-642-9992
Harrison, Chad	Operations Mgr.	603-766-1880	207-229-5435	207-571-8430
Control Room	Communications	603-766-7376	-	-

1.4.h Facility Phone Number

Main phone (603) 766-1883

1.4.i Facility Fax Number

Main Fax (603) 766-1886

2.0 SECTION II - CORE PLAN ELEMENTS

Section II of this ICP has been structured to exist as a separate document that may be used to actively respond to an emergency incident (Emergency Response Action Plan (ERAP)). The following pages include the most critical information to respond to an emergency incident:

- Emergency Phone Number;
- Discussion of Response Activities; and
- Specific Emergency Procedures (ERP-00 through ERP-010).

Newington Energy - EMERGENCY PHONE #'s (Yellow Pages)

Response Team Contact List

ICP Role	Name/Title	Response Time	Training [1] (Hours/Hazwoper)	Work Phone	Home Phone	Cell
Communications Coordinator	Power Plant Operator	60 minutes	24 Hrs/ Hazwoper	603-766-1880 x123	NA	NA
Incident Commander (1st)	D. Argyros - EH&S Mgr.	60 minutes	24 Hrs/ Hazwoper	603-766-1880 x109	603-642-9992	603-531-9779
Incident Commander (2nd)	T. Fallon - Facility Mgr.	60 minutes	24 Hrs/ Hazwoper	603-766-1880 x102	207-384-4857	603-767-3575
Incident Commander (3rd)	C. Harrison - Operation Mgr.	60 minutes	24 Hrs/ Hazwoper	603-766-1880, x116	207-571-8430	207-229-5435
Incident Commander (4th)	M. Uhlar - Maintenance Mgr.	60 minutes	24 Hrs/ Hazwoper	603-766-1880 x115	603-343-4257	603-320-4250
Emergency Coordinator (1st)	D. Argyros - EH&S Mgr.	60 minutes	24 Hrs/ Hazwoper	603-766-1880 x109	603-642-9992	603-531-9779
Emergency Coordinator (2nd)	T. Fallon - Facility Mgr.	60 minutes	24 Hrs/ Hazwoper	603-766-1880 x102	207-384-4857	603-767-3575
Qualified Individual	T. Fallon - Facility Mgr.	60 minutes	24 Hrs/ Hazwoper	603-766-1880 x102	207-384-4857	603-767-3575

[1] - Some operations staff have received 40 Hr Hazwoper training. All operations staff has received at least 24 Hr Hazwoper training. Most staff has previous power plant experience and training.

Chain of Command Responsibilities

TEAM MEMBER	TEAM RESPONSIBILITY	RESPONSE TIME (Minutes)	CONTACT INFORMATION	
			WORK	HOME
D. Argyros, T. Fallon, C. Harrison	Coordinator/ Command	60 minutes	603-766-1880, ext. 109, 102, 116	603-642-9992, 207-384-4857, 207-571-8430
D. Argyros, T. Fallon, C. Harrison	Operations	60 minutes	603-766-1880, ext. 109, 102, 116	603-531-9779, 207-384-4857, 207-571-8430
D. Argyros, T. Fallon, C. Harrison	Planning	60 minutes	603-766-1880, ext. 109, 102, 116	603-531-9779, 207-384-4857, 207-571-8430
D. Argyros, T. Fallon, C. Harrison	Logistics	60 minutes	603-766-1880, ext. 109, 102, 116	603-531-9779, 207-384-4857, 207-571-8430
T. Fallon - Facility Mgr.	Finance	60 minutes	603-766-1880, ext. 102	207-384-4857

Emergency Response Contractors/Co-Op

Contractor/Co-Op	Phone	Response Time	Contract Responsibility
United Oil	888-276-0885	1 Hour or less	OSRO (Primary)
Clean Harbors	603-224-6626	1 Hour or less	OSRO (large spill to water)
Piscataqua Co-Op	603-430-7208	1 Hour or less	OSRO
Portsmouth Harbor Towing	603-436-0915	1 Hour or less	Waterside Response

Other Phone Numbers and Contacts

GECS Off-Site Resources		
ICP Role	**Name/Title**	**Telephone #'s**
O&M Region Manager	M. Childs	781-393-5211 (Work)
NE Region EH&S Mgr.	R. Frizzle	603-767-2515 (Work)
GECS EH&S Mgr.	K. Chang	678-844-4645
Legal Counsel	E. Falso	770-859-7383
GEPS Air Program Lead	D. Schultz	518-385-9792
GEPS Water Program Lead	D. Schultz	518-385-9792
GEPS Waste Program Lead	D. Gaspari	714-572-8732

Fire Departments		
ICP Role	**Name/Title**	**Telephone #'s**
Ambulance/Fire	Newington, NH - EMS	9-1-1 603-436-9441
Ambulance/Fire	Portsmouth, NH - EMS	9-1-1 603-427-1500
Ambulance/Fire	Kittery, ME - EMS	9-1-1 207-439-2262
Ambulance/Fire	New Castle, NH	9-1-1 603-436-2515
Ambulance/Fire	Durham, NH	9-1-1 603-868-5531
NH Fire Marshall	Concord, NH	603-271-3294

Security		
ICP Role	**Name/Title**	**Telephone #'s**
Police	Newington, NH	9-1-1 603-436-7033
Police	Portsmouth, NH	9-1-1 603-436-2145
State Police - NH	New Hampshire State Police	9-1-1 603-679-5663
State Police - ME	Maine State Police	9-1-1 207-439-1141
FBI	Boston, MA (Sabotage & Terrorism)	617-742-5533
FBI	Portsmouth, NH	603-431-4583
FBI	Portsmouth, NH – Senior Resident Agent	603-472-2224
US Marshall's Service	NH Branch	603-225-1632

Hospitals		
ICP Role	**Name/Title**	**Telephone #'s**
Hospital (1st) Portsmouth, NH	Portsmouth Regional Hospital	603-436-5110
Hospital (2nd)Dover, NH	Wentworth Douglass	603-742-5252
Hospital (3rd)Exeter, NH	Exeter Hospital	603-778-7311

Nearby Industries & Residences		
ICP Role	**Name/Title**	**Telephone #'s**
North of Site - Industry	Sea 3 - LPG Dist.	603-431-5990
North of Site - Industry	Sprague Energy - Fuel/Oils	603-431-6000
North of Site - Rail Road Track	Guilford Ind. - RxR	978-663-9310
West of Site - Industry	Georgia Pacific - Mfg.	603-433-8000
West of Site - Industry	Westinghouse - Mfg.	603-433-1000
South of Site - Commercial	NoEast Surgical Center	603-431-5593
South of Site - Commercial	Mareld Assoc. - Mixed use	Vacant
South of Site - Commercial	Hauch Storage - Warehouse	603-431-2749
East of Site - Residence	Yeaton Residence	603-436-4642
East of Site - Residence	Beebe Residence	603-431-5868
East of Site - Residence	Labrie Residence	

Marine Emergencies		
ICP Role	**Name/Title**	**Telephone #'s**
US Coast Guard	Portsmouth Harbor Station	603-436-4414
US Coast Guard	Marine Safety - New Castle, NH	603-433-7324
US Coast Guard	Marine Safety - Portland, ME	207-780-3251
US Coast Guard	To Report Spills	800-321-6742
Portsmouth Port Authority	Harbor Master	603-424-8802

Federal #'s		
ICP Role	**Name/Title**	**Telephone #'s**
OSHA	To report serious injuries	800-321-6742
EPA Region 1	To Report Spills	888-372-7341
National Response Ctr.	Spill to River	800-424-8802
ChemTrec	Chemical Information	800-424-9300

State of NH #'s		
ICP Role	**Name/Title**	**Telephone #'s**
NH Dept of Env. Services	Hazardous Materials Spills	603-271-3899
NH Dept of Env. Services	Temporary Hazardous Waste ID #	603-271-2921
NH Dept of Env. Services	Oil Spill Response	603-271-3644
NH Dept of Env. Services	Off-Hours - State Police	800-346-4009
NH Dept of Env. Services	Spills to Water Supply	603-271-0655
NH Dept of Env. Services	Waste Water Spills (Sewer)	603-271-2001
NH Dept of Env. Services	Air Resources - Air Emissions	603-271-1370
SERC	To Report Spills	603-439-9441

Sensitive Area Trustees #’s		
ICP Role	**Name/Title**	**Telephone #'s**
Trustee	Audubon Society of New Hampshire	603- 224-9909
Trustee	Ducks Unlimited	800-453-8257

Town of Newington #'s		
ICP Role	**Name/Title**	**Telephone #'s**
Newington Water Treatment	Spills to Sanitary Sewer System	603-431-4111
Newington Water Supply	Spills to Water Supply	603-427-1530 (day) 603-427-1552 (evening)
Newington DPW	Town Garage - Snow Plow	603-436-6829
LEPC	To Report Spills	603-436-5737

Other #'s		
ICP Role	**Name/Title**	**Telephone #'s**
Local TV/Radio for Evacuation		911
Weather Report Phone Number		603-742-2511

2.1 Discovery

The objective of Procedure ERP-00, Incident Discovery is to describe the appropriate response actions to take when an observed or potential incident is initially identified at the Newington Energy facility. The person detecting an incident can provide immediate action to either facilitate subsequent response actions, or resolve the incident. A flowchart describing these actions is provided and described in ERP-00, Incident Discovery. This procedure shall be followed by all personnel at Newington Energy.

2.2 Initial Response

The following procedures have been developed to address initial response at the Newington Energy, LLC and have been included in Appendix A of this ICP:

ERP-00 - Incident Discovery
ERP-01 - Incident Assessment
ERP-02 - Medical Emergency Procedure
ERP-03 - Emergency Evacuation Procedure
ERP-04 - Fire and/or Explosion Procedure
ERP-05 - Spill/Release Procedure
ERP-06 - Security Disturbance, Bomb Threat Procedure and, Suspicious Mail/Packages
ERP-07 - Utility Failure Procedure
ERP-08 - Severe Weather Procedure
ERP-09 - Anhydrous Ammonia Release Procedure
ERP-010 - Civil Strife and Sabotage/Terrorism Threat Procedure

2.2.a Procedures for internal and external notifications

Internal notifications are completed as described in ERP-00, Incident Discovery and the associated flow diagram included in ERP-00 (Figure 1). Employee notification for evacuation, specifically related to alarm systems, is described in ERP-03, Emergency Evacuation Procedure. Notification and evacuation of the public in the event of an anhydrous ammonia release is described in ERP-09, Anhydrous Ammonia Release Procedure. In the event of civil strife or suspected acts of sabotage or terrorisim, ERP-010 provides procedures and contact information.

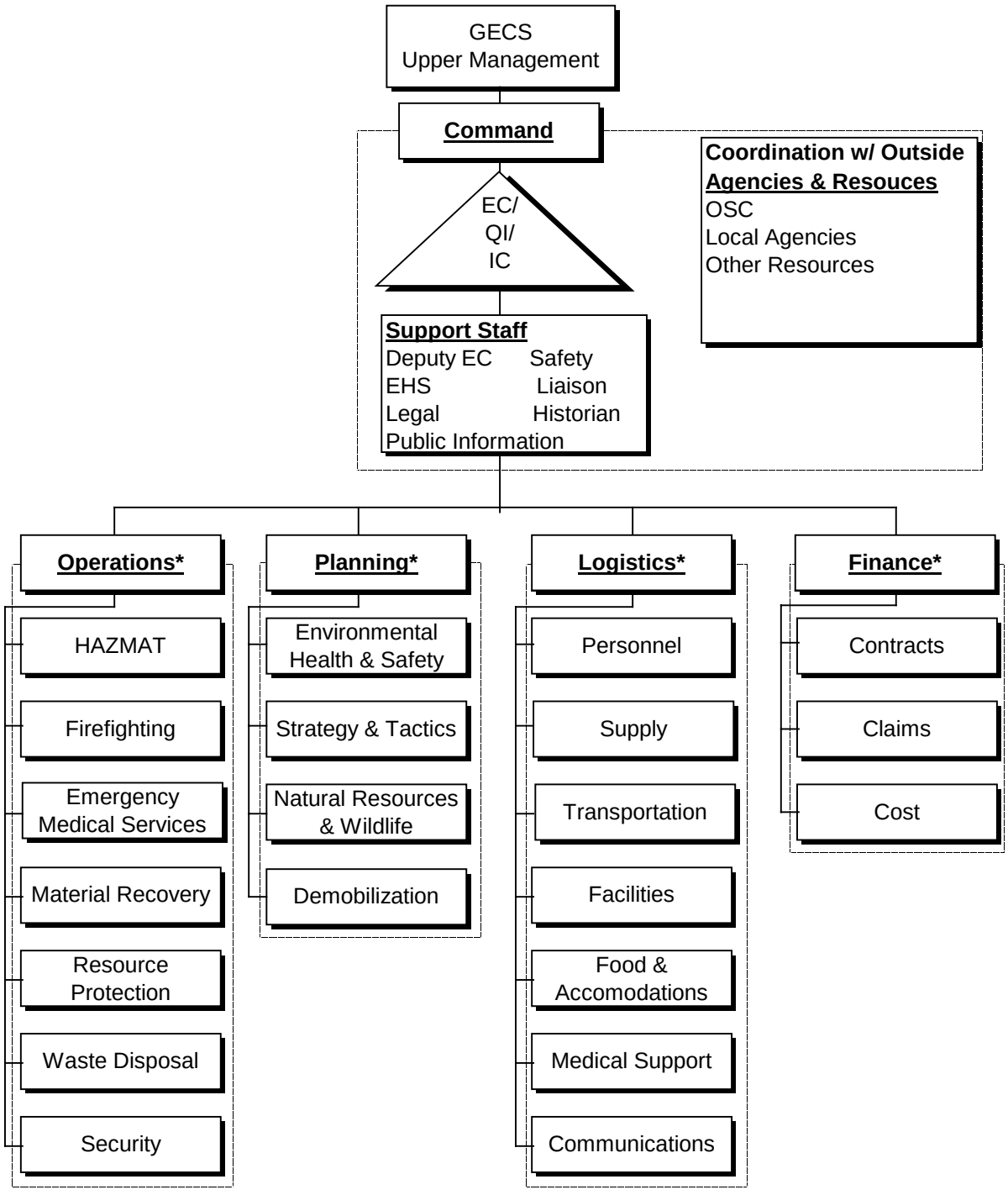
External verbal and written notifications are completed as specified in the Reporting and Notification Requirements Table identified in Appendix B of this ICP.

2.2.b Establishment of a response management system

The response management system for Newington Energy is provided in the organization chart on the following page (Response Management System). The system specifies emergency responsibilities at the facility. A detailed description of responsibilities and duties is provided in Section III 3.b of this ICP. This involves the development of an incident/emergency response organization and action plan to address small and large spill/release incidents and non-spill emergencies at this facility.

The response management system is put into action upon discovery of an emergency situation as described in Procedure ERP-00, Incident Discovery.

Response Management System



2.2.c Procedures for preliminary assessment of the situation.

Procedure ERP-01, Incident Assessment provides detailed instructions and information related to preliminary assessment of emergency incidents.

2.2.d Procedures for establishment of objectives and priorities

This section of the Integrated Contingency Plan identifies the objectives and priorities for specific types of emergencies at the facility. Objectives will be determined by the Incident Commander upon notification of an incident. The following general objective will be established for all response activities:

- "To complete emergency response activities as quickly and as safely as possible to minimize damage to the environment and property while ensuring the safety of the public and plant personnel."

More specific objectives will be defined by the Incident Commander as actions are implemented as described in ERP-05, Spill/Release Procedure.

In all emergency incidents, regardless of the quantity or type of chemical released, the following general priorities will be established for all response activities:

- First - Protect Public and Plant Personnel;
- Second - Protect the Environment; and
- Third - Protect the Plant Property.

Detailed prioritization will occur as actions are implemented as described in ERP-05, Spill/Release Procedure.

2.2.d.1. Immediate goals/tactical Planning

The immediate goals for the incident response are described above in "objectives and priorities". Tactical planning occurs during the implementation of response activities outlined in ERP-01, Incident Assessment.

2.2.d.2. Mitigating Actions

The Emergency Response Procedures (ERP's) are to be used to determine mitigating actions to be taken based on the type and magnitude of the incident.

2.2.d.3. Identification of resources required for response

See the "Yellow Pages" at the beginning of this section for the listing of available resources (personnel) and Appendix H of this ICP for a list of available materials, quantities and locations for emergency response.

2.2.e Procedures for implementation of tactical plan

The tactical plan is established in the ERP's (primarily in ERP-01, Incident Assessment). Implementation is based on training on the plan and established procedures, communications both internal and external, and utilizing the response management system described above.

2.2.f Procedures for mobilization of resources

Pre-planning is the key to mobilization of resources. All plant personnel are trained in the use of the ERP's, the "Yellow Pages" and resources lists. Off-site resources (Newington Fire, OSRO Contractor, and other critical resources) have been notified, consulted or contracted with prior to the need for their services.

2.3 Sustained Actions

Longer term emergency responses generally transition into diverse mitigation strategies and recovery operations. These longer-term actions rely heavily on extended support functions such as lighting, heating, additional supplies, catering of food, rotation of staffing. These functions are addressed in the supplies/resources section of the ICP as well as phone numbers and contacts for additional support. Additionally the ERPs presented in the tabbed areas identify the general procedures and/or actions to be taken for a particular emergency. However, the Incident Commander is responsible for developing an emergency-specific response plan appropriate to the nature and complexity of the emergency.

Once the emergency response actions are underway, further assessment by the Incident Commander or his/her designee is required to ensure that the course of action selected is the best possible. An on-going assessment should be performed to ensure that:

- The initial assessment of the emergency was accurate.
- The emergency response procedure is working effectively.
- Hazards to personnel, the public and the environment are being controlled.

Questions to be answered by the on-going assessment address four key areas:

The Public and Plant Personnel

Is a material being released or potentially being released in quantities likely to affect the public or plant personnel?

How soon might they be at risk?

Should they be evacuated or sheltered?

What areas of the plant or community are at risk (direction and distance)?

The Environment

Is material being released or potentially released in exceedance of reportable quantities?

Can the release be contained, diverted or reduced to minimize possible environmental impact?

Plant Property

Is the emergency likely to spread to other areas (and, if so, how soon)?

Will the hazard affect plant utilities or systems needed for safe operation?

How soon can processes be shut down, and how must this be coordinated?

Emergency Response Actions

Is there anything now known about the current status of the emergency that conflicts with the magnitude or nature of a previous assessment?

Are the current actions effectively mitigating the hazard?

Is there any additional course of action, or any additional resource, which would significantly improve the effectiveness of the action plan?

The on-going assessment is a critical tool to evaluate the current status of the response, and to keep the response actions focused on the best approaches to mitigate the emergency.

2.4 Termination and Follow-Up Actions

The Incident Commander, in conjunction with the Emergency Response Organization (ERO) members, is responsible for determining when the emergency is over. Consulting with off-site response agencies and/or emergency response contractor(s) may be required.

Termination should consider at a minimum:

- Is the situation stable and under control?
- Is there likely to be any release of materials or other hazard to plant personnel, public or the environment?
- Are the spill materials properly stored in accordance with the compatibility of the original material?
- Is there any need for the continued presence of off-site response contractors?
- Is there any need for continued involvement of the on-site emergency response organization?

Emergency Documentation

Once an incident is declared over by the Incident Commander, an Emergency Response Incident Report shall be completed. The report, which shall be completed by the Incident Commander or his/her designee, must include any pertinent information gathered during the response process.

Each form will be numbered and will become an official GECS report for the incident. A copy of the form shall be filed in the EHS department. Any of the documentation necessary to support the information contained on the form shall be included or its location referenced.

Follow-up critiques

Follow-up critiques will be discussed in the EHS meetings to recreate the actions taken and decisions made. The following describes the type of information which should be collected to determine lessons learned:

- Interview those individuals who initially detected the release to determine probable cause.
- Reconstruct the activities that took place during initial deployment of equipment.
- Were there any activities which occurred that should be corrected?
- Describe whether internal and/or external notifications took place without any glitches. Did individuals know their responsibilities?
- Did the communication system function as it is supposed to?
- Were proper notifications made?
- Did the plan help determine who had to be called?
- Were the numbers listed accurate?
- Did the incident command system function appropriately?
- Were there discrepancies on who had responsibility for what function?
- Did staff demonstrate ability to assemble and respond to the incident?
- Were there any decisions made by the Incident Commander that affected how future response actions were implemented or resulted in difficulties for response actions?
- Were there enough personnel to carry out the actions necessary to support the spill operations, including food, sheltering and transportation? Was the ICP functional? Does any information need to be changed?

3.0 SECTION III - ANNEXES

3.1 Annex 1. Facility and Locality Information

The NEL Power Project is a 525 MW gas fired combined cycle power plant located at 200 Shattuck Way in Newington, NH. The facility is approximately 1000 feet from the Piscataqua River in a mixed zone area. The NEL Facility is to be owned and operated as a merchant power facility using state-of-the-art technology and environmental controls that provide extremely high operational efficiency and low air emissions. Through the use of natural gas and low sulfur No. 2 Fuel Oil (distillate) as a backup fuel, the facility will generate enough power to supply 700,000 homes in New England.

General Electric Contractual Services (GECS) is under an Operations and Maintenance (O&M) contract to operate and maintain this facility for NEL. GECS will have personnel on site full time and NEL will have a representative dedicated to the site but will only be on site on an as needed basis.

3.1.a Facility maps

The following facility maps have been included to identify the site location as well as site features required by the ICP:

- Figure 1 - Site Location Map
- Figure 2 - Facility Plot Plan
- Figure 3 - Site Evacuation Map (Exits/Rally Points)
- Figure 4 - Tank Locations and Containment
- Figure 5 – Facility Site Drainage
- Figure 6 - Fire Extinguisher Locations

3.1.b Facility drawings

The following facility drawings have been included to provide site and equipment detail required by the ICP:

- Drawing 1 – Fuel Oil Tank (Tank 21) Ringwall

- Drawing 2 – Catch Basins/Drainage System with Sumps
- Drawing 3 – Oil Water Separator (OWS) and Discharge System
- Drawing 4 – Bulk Oil Aboveground Storage Tank
- Drawing 5 - Fire System Piping

3.1.c Facility description/layout

3.1.c.1. Facility Overview

Newington Energy, L.L.C. owns and operates the Newington Power Facility on an approximately 24-acre industrially zoned parcel in Newington, New Hampshire (see Figure 1). The site is situated approximately 2.5-miles northwest of Portsmouth, 7-miles southeast of Dover and is approximately 1000-feet southwest of the Piscataqua River. The natural gas fired facility can nominally generate 525 MW of electricity using advanced "combined cycle technology." To enhance overall reliability, the combustion turbines are also capable of firing low sulfur No. 2 fuel oil (distillate) as a back up fuel. The major components of the plant include two combustion turbine generators, two heat recovery steam generators, a steam turbine generator with condenser, a cooling system consisting of mechanical draft cooling towers equipped with plume abatement, and a water treatment facility (see Figure 2).

The two combustion turbine generators produce electricity and exhaust hot gases (i.e., the exhaust flow) into the heat recovery steam generators. The heat recovery steam generators use the heated exhaust flow to produce steam. The steam is then used to drive a steam turbine to produce additional electricity with no additional fuel during normal operation. Low-pressure steam exiting the steam turbine is routed through a condenser and cooled. The condensed water is then returned or recycled to the heat recovery stream generators. This is referred to as "combined cycle technology" because electricity is produced via the gas cycle in the combustion turbine generators and via the steam cycle in the steam turbine generator.

The site layout was designed to efficiently utilize available space while minimizing impacts to on-site wetlands. Principal components of the generating station are briefly described below. Facility maps and drawings identifying the location and structures described below have been included as described above in Sections III 1.a (Facility Maps) and III 1.b (Facility Drawings).

Operations Buildings and Other Structures

The following is a description of operations buildings and other structures that are important to this ICP:

- ***Turbine Building***. The Turbine Building, approximately 125 feet wide and 325 feet long, houses the two combustion turbine generators; the steam turbine and steam turbine generator; and associated mechanical and electrical equipment. It is equipped with an overhead crane that can travel over the combustion turbine generators and the steam turbine to facilitate maintenance.

- ***Administration/Control Building***. A 75 by 160-foot Administration and Control Building is located immediately southeast of the Turbine Building. This building houses the administrative offices, the facility control room and equipment (e.g., spare parts) warehousing areas.

- ***Heat Recovery Steam Generators***. Outside and adjacent to the Turbine Building are two heat recovery steam generators. In the Heat Recovery Steam Generators (HRSGs) waste heat from the exhaust flow of the combustion turbines is recovered to produce steam. Once useful heat from the exhaust flow has been extracted, the exhaust gas is then directed to the selective catalytic reduction system and exits through one multi-flue stack.

- ***Cooling Tower***. The mechanical draft cooling tower at the site has 10 cells that make the structure approximately 650 feet long and 65 feet wide. Two 1250 HP pumps circulate water from the cooling tower to the steam turbine condenser. The cooling tower is equipped with high efficiency drift eliminators, to minimize the loss of cooling water via cooling tower drift.

- ***Water Treatment Building***. The water treatment building is a separate 45-foot by 60-foot structure that houses the boiler water pre-treatment equipment. The building contains ion exchange vessels, regeneration equipment, and chemicals for regeneration and inlet water treatment.

- ***Electrical Switchyard***. The electrical switchyard is located west of the Turbine Building. The switchyard contains step up transformers that take electricity from each generator and “step up” the generation voltage (18

kV) to the transmission voltage (345 kV). The switchyard also contains bus work and associated breakers for interconnection, protection and relaying electricity.

- ***Oil Storage Tank***. An approximately 1 million gallon fuel oil day tank is located south of the Administration/Control Building. Fuel oil is received by pipeline or bulk tanker truck deliveries. The aboveground fuel tank is equipped with a secondary containment dike; overflow protection; level gauges; and a visual and audible high-level alarm. A covered fuel off loading station is located immediately east of the fuel storage tank.

- ***Raw Water Storage Tank***. The raw water storage tank is 56 feet tall and 123 feet in diameter. This tank holds 5 million gallons of raw water as makeup to the water treatment cycle. The raw water storage tank is also used to augment the facility's fire protection needs.

- ***Demineralized Water (Demin) Storage Tank***. The demin storage tank holds demineralized water from the water treatment system. The demineralized water storage tank is 40 feet high and 66 feet in diameter and holds 1 million gallons of demineralized water.

- ***Anhydrous Ammonia Storage Area***. Anhydrous ammonia is used in the selective catalytic reduction (SCR) system to control nitrogen oxide (NOx) emissions. The above ground tanks are located near the northwest corner of the cooling tower. The two 2,000-gallon (19,992 lb.) storage tanks are equipped with secondary containment and an off loading area. These tanks are maintained at 250 to 280 PSIG so that the anhydrous ammonia remains a liquid at ambient temperature. Trucks with a capacity of up to 10 tons (approximately 1775 gallons) deliver ammonia to the site approximately every four days.

- ***Paved Roads and Parking Areas***. On-site parking for up to 20 vehicles is provided for facility employees and visitors.

- ***Piscataqua River Intake***. Cooling water for the facility is obtained from an intake located in the Piscataqua River. The intake has been located and designed to minimize the potential for entrainment or impingement of fish. It is equipped with a traveling screen/spray wash capability and return channel to safely return any marine life inadvertently drawn into the intake back to the river.

- ***Piscataqua River Diffuser***. A multiport diffuser is used to discharge cooling tower blowdown back to the Piscataqua River. The diffuser contains six, three-inch ports oriented perpendicular to the direction of tidal flow to maximize initial dilution and maintain ambient water quality criteria.

3.1.c.2. Aboveground Petroleum Storage Tanks and Drum Storage

A total of twenty-two (22) Aboveground Storage Tanks (ASTs) containing petroleum products are maintained at the facility, along with drum storage located on containment pallets in the warehouse portion of the administration/control room building. A detailed summary of those ASTs is located in the table provided in Appendix D and includes tank capacities, containment, construction, alarms, etc. The location of the facility ASTs, drum storage, and associated containment, where applicable, are identified on Figure 4. ASTs in Appendix D have secondary containment, with the exception of Tank 22 (River Intake Transformer). Currently, in the event of a release, Newington Energy would respond or rely on its spill response contractor to respond to, contain and mitigate spills. Newington Energy is currently committed to back-up spill resources and response equipment through its contracts with Clean Harbors and United Oil (see Appendix J).

3.1.c.3. Aboveground Chemical Storage Tanks

The facility requires the storage/use of water treatment chemicals for pre-treatment of boiler makeup water, cooling tower conditioning and for use in the SCR system (anhydrous ammonia). These chemicals are delivered by bulk carrier or within closed containers (i.e., tank truck, 55 gallon drums or totes). A listing of chemicals used in various areas of the facility is included in Table 3-1. The table also identifies the approximate storage quantity and type of secondary containment provided. Storage and handling practices for these and other chemicals are described below. Any solids or liquids other than rainwater found within containment area sumps will be collected for off-site disposal at an appropriately licensed facility.

Table 3-1
On-site Chemical Storage
Cooling Tower

Chemical	Storage Area	Approximate Quantity On-site	Secondary Containment
Sodium hypochlorite	Outdoor/Adjacent to Cooling Tower Treatment Shelter	5000 gallon tank	Concrete Basin
Biocide	Indoor/Cooling Tower Treatment Shelter	400 gallon tote	Curbed dike
Scale Inhibitor	Indoor/Cooling Tower Treatment Shelter	400 gallon tote	Curbed dike
Demineralized Water Pre-Treatment Plant			
Chemical	**Storage Area**	**Approximate Quantity On-site**	**Secondary Containment**
Sulfuric Acid	Indoor/Water Pre-treatment Building	6,000 gallon tank	Concrete Dike
Sodium Hydroxide	Indoor/Water Pre-treatment Building	6,000 gallon tank	Concrete Dike
Sodium Bisulfite	Indoor/Water Pre-treatment Building	(2) 55-gallon drums	Curbed dike
Heat Recovery Steam Generators			
Chemical	**Storage Area**	**Approximate Quantity On-site**	**Secondary Containment**
Nalco BT-3000	Outdoor between the HRSGs	400 gallon tote	Curbed dike

3.1.c.4. Anhydrous Ammonia

Anhydrous ammonia is used as a catalyst for NOx emissions control in the SCR units. Anhydrous ammonia is delivered to the Facility by truck at an estimated frequency of every 4 days while firing on natural gas and every other day while firing on fuel oil. The storage area is equipped with a low point gravity drain/sump in the truck containment area.

The transfer of anhydrous ammonia from delivery trucks will occur within a concrete lined, covered off-loading area in accordance with the tank truck unloading procedure described in the facility's RMP/PSM Manual. Any spillage

in the unloading area will run into a local sump. In the unlikely event of a significant release from the tank, the deluge system could be activated and spilled liquid would be retained within the containment area. All unloading operations will be performed under the direct supervision of plant personnel as described below.

3.1.c.5. Loading/Unloading of Transportation Vehicles and Potential Releases

Bulk loading and unloading activities of petroleum and other hazardous materials are completed at various locations throughout the facility. However, protective systems, including containment, drainage, and procedures, have been established to minimize the potential for releases of these materials. The following describes the physical protective systems, specifically containment and drainage, to minimize releases of hazardous materials.

No. 2 Fuel Oil Tanks 1 - 4

Tanks 1 and 2 (See Figure 4) are 250 gallons tanks located in the Turbine Building associated with the False Start Drains for Turbine 1 and Turbine 2, respectively. Those tanks would typically be empty unless a turbine false start occurs when operating on No. 2 fuel oil. In the instance of a false start, the fuel oil would drain to the tank associated with the particular turbine. The No. 2 fuel would then need to be pumped out of the tank by a vacuum truck and pumped back to the bulk oil storage tank, No. 21. Both tanks are located inside a building and a release from the tanks would be directed to floor drains that discharge to concrete sumps with capacity to hold the entire content of those tanks.

No. 2 fuel oil will be used to operate the Emergency Generator and the Diesel Fire Pump (See Figure 4). Tank 3, located outside, to the north of the Administrative/Control Building, is a 425 gallon tank associated with the facility emergency generator. The emergency generator has a double walled tank. Refilling of the tank is by truck fuel oil delivery. Any release of product from the tank or from refilling operations by truck would be contained within the facility storm water drainage system described below.

Tank 4, located inside the Fire Pump House, is a 350 gallon tank for powering the fire pump engine. The tank is located within a steel reservoir inside the Fire Pump House. Refilling of the tank is by truck fuel oil delivery connections outside the Fire Pump House. Any release of product from the tank or from refilling operations by truck would be contained within the building or would enter the facility storm water drainage system/retention basin.

Tank trucks for Tanks 3 & 4 described above have a maximum oil storage compartment capacity of approximately 7,500 gallons. Trucks typically transfer product at a rate of approximately 350 gallons per minute. Manual shut downs are located on the truck.

Bulk delivery to Tank 21

Tank 21 is a 939,451 gallon bulk aboveground storage tank for Low Sulfur No. 2 fuel oil. The tank is primarily filled from an inter-facility underground pipeline connection to Sprague Oil (Sprague). Transfer of product from Sprague is verbally agreed upon during a face-to-face meeting between employees from Sprague and Newington Energy. Product meters have been installed on both ends of the line connecting Tank 21 and Sprague. Product transfer operation are monitored by employees from Sprague and Newington Energy

Newington Energy is capable of receiving a maximum of approximately 24,000 bbl per day from Sprague. When operating on No. 2 fuel oil, 24,000 bbl of product can be transferred during a single day and transfers would typically occur daily. The pipeline is capable of delivering 750 gallons per minute of fuel oil.

The pipeline is double walled and has pressure sensors at five (5) locations in the line. The pipeline is constructed of plastic encased in concrete with an external steel casing.

Tank 21 is equipped with Hi and Hi-Hi alarms that will provide visual and audible alarms at both Sprague and Newington Energy. The tank has been constructed with cathodic protection. Secondary containment for Tank 21 is

provided by a steel ringwall structure with a gravel foundation (Drawing 1). In the event of a release or overflow from the tank, containment would be available for 1,118,894 gallons of product. Smaller releases or spills of product in the containment area can be collected in the containment area (Catch Basin #1 - see Drawing 2) and directed to the oil/water separator treatment system. Scenarios describing a catastrophic release, specifically failure of the tank and associated containment, have been included in Section III 3.d.1, Hazard Assessment.

In addition to delivery of product by pipeline, the facility is capable of receiving product into Tank 21 by tanker truck. An off-loading area for tanker trucks is located to the east of Tank 21. The off-loading area is equipped with an unloading canopy as well as containment for spills or releases from off-loading operations. Smaller releases or spills of product in the containment area can be collected in the containment area (Catch Basin #2 - see Drawing 2) and directed to the oil/water separator treatment system.

Lube oils, Transformer oils, and Hydraulic oils - Tanks 5 through 20, 22 and Drum Storage.

Tanks 5 through 20 and 22 are aboveground storage tanks for quantities of Lube oils, Transformer oils, and Hydraulic oils from approximately 100 to 6,000 gallons (see Appendix D for details on each tank). In addition, drum storage for lubricants and waste oils are stored within the administrative/control building's warehouse area. Routine refilling activities are not expected to be associated with this equipment, however maintenance activities would require potential removal, refilling, or topping-off activities of the various fluids. Containment is available for the referenced equipment via dikes, concrete sumps, or concrete containment.

Releases beyond containment during draining or refilling activities are unlikely, however equipment located indoors would have building containment through floor drains and the associated water treatment system to act as additional containment. Releases beyond containment from equipment located outdoors would most likely enter the storm water drainage system and retention basin.

Terminal Product Piping

Various aboveground and underground (inter-terminal pipeline) product pipelines located at the facility could potentially be sources of a release. Such piping includes lines to facility equipment (intra-facility piping) and from the bulk product connection to Sprague Energy. Product releases occurring from these sources would flow in various directions depending on the specific source. As described above, releases of product and other materials would be contained within buildings, enter the facility Waste Water Collection and Treatment System, or enter the facility storm water drainage system/retention basin. It is expected that there would be no release of oil from the product connection to Sprague since the piping is double walled and pressure sensors within the line would alert Newington Energy personnel to a break within the internal plastic wall.

Hazardous Materials Bulk Storage

As described above, two (2) 6000 gallon bulk chemical storage tanks (sulfuric acid and sodium hydroxide) are located inside containment within the Demineralization building. Containment of releases from those tanks is provided by concrete dikes. Off-loading from tanker deliveries to those tanks is through piping connections outside of the north side of the Demineralization Building. Any release of chemicals from the tanks or from off-loading operations by truck would be contained within the building or enter the facility storm water drainage system/retention basin, respectively.

One (1) 5000 gallon bulk chemical storage tank for sodium hypochlorite is located outside in containment adjacent to the cooling tower treatment shelter. Off-loading of sodium hypochlorite by bulk tanker occurs outside, with the tank connections in containment. Any release of chemicals from the tank or from off-loading operations by truck would be contained in the concrete containment or enter the facility storm water drainage system retention basin, respectively.

Three (3) 400 gallon totes are located on-site for chemical storage associated with the cooling towers and Heat Recovery Steam Generators (HRSGs). Two (2) totes associated with the cooling towers (biocide and scale inhibitor) are located in curbed containment in the cooling tower treatment shelter. Any release of chemicals from the totes or from off-loading operations by truck would be contained within the concrete curbing or enter the facility storm water drainage system/retention basin, respectively. One (1) tote of Nalco BT-3000 is associated with the HRSGs. The tote is located outside, in curbed diking between the HRSGs. Any release of chemicals from the totes or from off-loading operations by truck would be held in the concrete diking or enter the facility storm water drainage system/retention basin, respectively.

Off-loading procedures for bulk delivery of hazardous materials described above have been included in Appendix (Hazardous Chemical Delivery Procedure).

Other Procedures and Preventative Measures for Hazardous Materials Storage

More specific procedures and preventative measures related to loading and unloading petroleum and other hazardous materials have been included in Section III Annex 7, Protection.

3.1.c.6. Typical Daily Operations

Day-to-day operations at the facility principally include the generation of electricity using natural gas and No. 2 fuel oil. In accordance with Newington Energy's air emission permits, No. 2 fuel oil may only be used for thirty (30) days during the operating year. Petroleum product related operations include receipt of No. 2 fuel oil from Sprague Oil by pipeline or from other fuel oil vendors by tanker trucks, checking inventory, routine maintenance and inspections. Procedures have been established for these operations and Newington Energy personnel are trained in these procedures.

Facility inventory is checked throughout the day by the visual monitoring of bulk tank product levels and maintaining records. Routine maintenance is ongoing and may include repair/ replacement of valves, pumps, filters and transfer piping. Visual inspection of the facility is conducted daily by Newington Energy operators and a more detailed inspection report is completed monthly (refer to Appendix Q - Maintenance, Inspection, and Testing for a description of facility inspections).

No. 2 oil stored in Tank 21 is transferred to the facility boilers for the generation of steam. No. 2 oil is also stored in Tanks 3 and 4 for the Emergency Generator Fuel and Diesel Fire Pump.

Normal Daily Throughput

Daily product throughput at the facility includes deliveries of product via truck and via the Sprague Pipeline. The total storage capacities for the principal facility products are presented below (Table 3-2) including an estimate of monthly and daily receipts and distributions.

TABLE 3-2
Newington Energy, LLC
Typical Product Throughputs

Product	Approx. Total Quantity Stored [1] (gal)	Average Monthly/Daily Receipt (gal) [2]	Average Monthly/Daily Distribution (gal) [3]
No. 2 Fuel Oil	1,016,000	2,500,000/120,000	NA
Lube Oil	16,800	NA	NA

Note:
1. The total storage quantities are based on tank capacities.
2. Average daily/monthly throughput information was provided to Triton Environmental by Newington Energy.
3. Newington Energy does not distribute petroleum products from its facility. No. 2 fuel oil is consumed on-site

3.1.c.7. Storm Water Drainage System

The main plant area is divided into two principal drainage zones. Zone 1 is located along the northern portion of the developed site area. Storm water runoff from this area is collected and conveyed through a series of catch basins interconnected by a subsurface piping network (See Figure 5). This includes drainage from the northern side of the turbine building, the eastern side of the turbine building, the administration/control building and areas adjacent to the northern section of the cooling tower. The Zone 1 collection system conveys storm water easterly towards the facility's storm water management basin located on the eastern portion of the property.

The storm water management basin is a man made vegetated detention basin. Storm water that does not infiltrate through the bottom of the basin is discharged through a weir at the eastern most part of the basin. The discharge from the weir is to a wetland area in the northeast corner of the property. Storm water overflow from the wetlands area is through a drainage culvert in the northeast corner of the property that runs under a portion of Avery Road that generally travels east and west. That drainage culvert ultimately discharges to the Piscataqua River.

Zone 2 is located along the southern portion of the developed site area. Zone 2 consists of both surface and subsurface collection systems that discharge to the southern end of the storm water management basin. The Zone 2 system collects and conveys runoff from the southern and western sides of the Turbine Building, the water treatment area, the oil storage area and areas adjacent to the southern end of the cooling tower. The Zone 2 collection system also conveys storm water easterly towards the facility's storm water management basin located on the eastern portion of the property. Storm water collected from Zone 2 progresses from the storm water management basin as described above for Zone 1.

3.1.c.8. Waste Water Collection and Treatment System

System Description

The Waste Water Collection and Treatment System (WT) collects, segregates and processes all waste water streams generated by the facility for disposal in conformance with local water quality requirements.

The Waste Water Collection and Treatment System consists of three sub-systems: a waste water drain system, a waste water separation system, and sanitary sewer collection and disposal system.

The waste water drain system consists of underground collection piping which drains into oily water sumps (see Drawing 2). The capacity of the sump pumps associated with the oily water sumps is 165 gallons per minute. There are two (2) oily water sumps in the plant, one located in the Gas Turbine Generator (GTG) & Steam Turbine Generator (STG) area, 1WT-SU-0001, and the other located in the Fuel Oil Tank area, 1WT-SU-0002. The oily water collected in the plant is pumped out of each sump using the Oily Water Sump Pumps, 1WT-P-0001 and 1WT-P-0002, to a common Oil/Water Separator (OWS), 1WT-OWS-0001.

The waste water separation system consist of the common Oil/Water Separator, mentioned above, and Clean Water Sump 1WT-SU-0003 with Clean Water Sump Pump 1WT-P-0003 (See Drawing 3). The oily water entering the OWS is separated into oil and water layers. The oil layer is skimmed off at the top and routed to an oil compartment within the OWS and the oil is removed using a vacuum truck. The clean water drains into the clean water sump and is then pumped to the POTW. Any solids in the system collect in a sludge collection chamber within the OWS and can be removed using a vacuum truck.

There is one Sanitary Sewer collection and disposal system within the plant located near the Administration/Control Room. The system consists of collection piping from various plumbing fixtures and washing facilities that drain to the Sanitary Lift Station (1WT-SKID-001). The clean waste water is tied-in at

the top of the waste stream header from the sanitary lift station and the combined stream is pumped to the POTW. The wastewater discharged to the POTW is permitted with maximum flow of 9000 gallon per day, maximum temperature of 104 ^{0} F; and pH ranges from 6.5 to 9.0.

System Design

Waste Water Drain System

The system is designed to treat only waste water possibly contaminated with oil or grease. Equipment containing oil will have drain funnels provided for receiving oil water effluents. The underground drain system will direct waters to the nearest Oily Water Sump. Water contaminated with oil can originate from the following sources:

- Floor Drains;
- Drains, leaks, and spills from lube oil skids or oil lubricated equipment; and
- Storm water runoff in contact with oil containing equipment.

The following waste water sources are included for the GTG & STG area Oily Water Sump, 1WT-SU-0001;

- Drains from the Gas Turbine/Generator (GTG) Areas
- Drains from the Boiler Feed Water Pumps Areas
- Drains from the Diesel Generator Area
- Drains from the Heat Recovery Steam Generators Areas
- Drains from the Air Compressor Area
- Drains from the Warehouse Area

The following waste water sources are included for the Fuel Oil Tank area Oily Water Sump, 1WT-SU-0002:

- Drains from the Fire Water Pump House
- Drains from the Raw Water and Demineralized Pumps Area
- Drains from the catch basin in the Fuel Oil Pump Area
- Drains from the catch basin in the Fuel Oil Tank Area

Waste waters from the Fuel Oil Pumps and the Fuel Oil Tank areas will be contained within Catch Basins #1 and #2 to allow visual inspection and testing before being released or processed. Two (2) PIVs, normally locked closed, are provided at each catch basin to direct flow to either the storm water management basin (clean water) or to oily water sump (1 WT-SU-0002). Upon completing visual inspection and testing of the waste water, Newington Energy personnel would open one of the drain valves to direct discharges from the catch basins to either the storm water detention pond or the oily water sump. If the waters are free from oil and other contaminates, it will be release to the storm water management basin. Contaminated oily water will be drained to the oily water sump. In the event of a large oil spill in the Fuel Oil Pump and Tank area, oil will be removed with a vacuum truck.

Oil Water Sumps and Pumps

The Oily Water Sumps accumulate waste waters from the Waste Water Collection System. There are two oily water sumps in the plant, one located in the GTG & STG area, 1WT-SU-0001, and the other located in the Fuel Oil Tank area, 1WT-SU-0002. Each sump is equipped with one, 100% capacity pumps, 1WT-P-0001 for 1WT-SU-0001 and 1WT-P-0002 for 1WT-SU-0002. The pumps start and stop automatically or manually through DCS. The DCS instrumentation includes sump level alarms for High-High Level (HHL) and Low-Low (LLL) conditions and "Running" status for each pump motor. The pumps transfer the oily water from the collection sump to the Oil/Water Separator.

In automatic mode, the pump will start and stop based on the level transmitter signal, 1WT-LI-0670 at the GTG & STG area sump or 1WT-LI-0672 at the Fuel Oil Tank area sump, from the DCS. In manual mode, the pump can be started as long as the sump level is above 2'-0'. If the level drops below 2'-0', the pump is stopped.

Oil/Water Separator

The Oil/Water Separator (OWS), 1WT-OWS-0001 is a self-contained, steel enclosure installed above ground. The OWS is a corrugated plate interceptor (CPI) device. As the water flows through the OWS, oil is separated by specific gravity differences. The OWS is designed to reduce the effluent oil content to less than 10 ppm, by weight. The oil is skimmed within the OWS and routed to an oil compartment. The oil compartment must be emptied by vacuum truck when full and the contents removed from the facility is recycled or properly disposed. Normal plant operation should result in very little oil waste accumulation. Solids, contained in the waste water, will collect in the Sludge Collection Chamber of the OWS and should be removed by vacuum truck for disposal outside of the facility. Clean water from the water compartment gravity drains into the Clean Water Sump. To prevent freezing, electric immersion heaters are provided for both the oil and water compartments.

Clean Water Sump and Pump

Clean waste water exits the OWS by gravity and enters the Clean Water Sump, 1WT-SU-0003. The sump is equipped with one pump, 1WT-P-003. The pump starts and stops automatically or manually through the DCS. The DCS instrumentation includes sump level alarms for HHL and LLL conditions and "Running" status for the pump motor. The pump transfers the clean water into the sanitary waste stream header with ultimate disposal at the POTW.

In automatic mode, the pump will start and stop based on the level transmitter signal (1WT-LT-0652) to the DCS. In manual mode, the pump can be started as long as the sump level is above 2'-0'. If the level drops below 2'-0', the pump is stopped.

To ensure that the waste water discharges to the POTW does not exceed the pH and temperature discharge permit, a pH analyzer (1WT-AE-0650) is provided on the discharge header. Similarly, a temperature element (1WT-TE-0650) is also provided.

Sanitary Sewer

There is one Sanitary Sewer collection and disposal system (1WT-SKID-0001) within the plant located near the Administration/Control Room. The system consists of collection piping from various plumbing fixtures and washing facilities that drain to the Sanitary Lift Station. The level in the well is automatically controlled by the vendor supplied control panel, which will turn pumps on and off. The controller also provide automatic lead/lag alternating so the pumps get equal utilization.

The clean waste water is tied-in at the top of the waste stream header from the sanitary lift station and the combined stream is pumped to the POTW. In order for the POTW to determine if the plant waste water discharge is within the discharge permit of 9000 gallon per day, a flow element (1WT-FE-0650) with a DCS flow recorder (1WT-GQI-0650) is provided at the discharge header.

3.1.c.9. Terminal Piping System for Bulk Product Transfers

The piping system for bulk product transfers is located throughout the Newington Energy facility. The primary connections are from an underground pipe line from the off-site supply facility (Sprague Energy), bulk aboveground storage tank (Tank 21), and the main boiler units. In addition to the off-site supplier, piping also exists for bulk tank truck off-loading to Tank 21. Other piping systems are associated with the transfer of products within the Station. Facility bulk petroleum piping details are shown in Drawing 4.

Other than the underground bulk product line connection to Sprague, all product piping at Newington Energy is aboveground and readily accessible for inspection and visible to traffic. Aboveground piping is constructed of steel and is compatible with the products handled. Piping and associated equipment is

inspected periodically during normal operations for signs of corrosion or deterioration. Valves, pumps, and connections are checked periodically for signs of deterioration during the course of normal facility operations. Piping which is not in service for any extended period of time is blank-flanged at the source or capped. Critical valves associated with these inactive lines are locked and lines are labeled as being secured and inactive.

Pipe supports are designed to minimize abrasion and corrosion and to allow for expansion and contraction. Piping is painted, coated, or wrapped (insulated) to minimize corrosion and deterioration. Active product piping is pressure tested as necessary and piping that has been out of service for an extended period of time is tested prior to returning to service.

Most of the piping associated with the waste water collection and treatment system described above is below ground. The quantity of oil that would be contained and directed through the waste water collection and treatment system on a daily basis is expected to be minimal.

3.2 Annex 2. Notification

Various Federal, State and local regulations require the notification of specified agencies of spills/releases of petroleum product, hazardous materials, hazardous substances and hazardous wastes and other emergencies. This section of the ICP describes the reporting requirements established by Federal, State, local authorities, and GECS policy following a spill of oil or a hazardous material and other emergencies at the NEL facility. It provides information about the reporting responsibility at NEL, the criteria and deadlines for notification, the appropriate agencies to be notified and the format for notification following an incident.

The Reporting and Notification Requirements Table in Appendix B of Section I of this ICP summarizes the conditions that require verbal/written reporting, the agencies that must be notified, and the deadlines for notifications. Additional phone numbers that may be useful during notification, such as contact information for local agencies, are included in the front pages of Section II of this ICP. Conditions that require written notification, agencies to be notified, and deadlines for notifications are summarized in the Reporting and Notification Requirements Table. ERP-00 - Incident Discovery provides forms for use in documenting the emergency and supplying relevant information to the regulatory agencies.

The Emergency Coordinator is responsible for ensuring that the necessary notification(s) are made to the appropriate agencies during or after a spill or release or other emergency at the NEL facility. Notification of a release should be made without delay, and should not be held up pending collection of additional information, if appropriate. This is particularly true in cases of immediate notification requirements and/or those with a 2-hour notification deadline, as required by the National Response Center (NRC), U.S. Coast Guard, and the EPA. The Local Emergency Planning Committee (LEPC), New Hampshire Department of Environmental Services and/or OSHA also need to be promptly notified following certain releases/events. In addition, internal GECS reporting is required for significant events that occur at the facility. Missing information should be supplied during follow-up calls to the agencies.

3.2.a Internal Notifications

The purpose of GECS's internal Incident Reporting Program is to ensure GECS are notified of all incidents as soon as possible. This program also provides a systematic method for investigating and reporting an incident at a GECS site and identifying corrective actions steps to prevent a reoccurrence. This program also provides a set of checks and balances that all pertinent internal, local, State and Federal notifications have been made in a timely manner. ERP-00 - Incident Discovery details follow-up requirements.

All EH&S incidents will be reported to the Facility Manager. The facility manager or designee will notify the customer and the GECS Regional Manager and GECS Regional EH&S Manager.

3.2.b Community Notifications

In the event of a leak of flammable or combustible material from an aboveground or underground tank or piping when measured by tightness test or determined by other methods to be lacking, the Newington Fire Department and NHDES should be notified immediately.

GECS must provide the Newington Water and Sewer Commission (NWSC) with verbal notice within 24 hours of a violation of the POTW permit. The NWSC is to be notified immediately upon the accidental discharge of substances prohibited by the permit, slug loads or spills that enter the sewer.

3.2.c Federal and State Agency Notification

Federal Notification - Releases of Oils

The Federal Clean Water Act (40 CFR 110-112) requires that any visible oil sheen resulting from a petroleum release to surface waters of the United States or release that violates applicable water quality standards (40 CFR 110.3) be **immediately reported** (as soon as knowledge is obtained) to the National Response Center (NRC). Procedure ERP-00, Incident Discovery, contains a notification form (Form ERP-00-2) that may be completed and used when notifying the NRC of any petroleum spill pursuant to the OPA-90 regulations. All

information in the form, however, does not have to be known/filled in before this NRC reporting is made. A lack of complete information is not a reason to delay the necessary NRC reporting.

As summarized in ERP-00, Incident Discovery, releases to a surface water body also must be reported to the U.S. Coast Guard. Further, because GECS is permitted under the National Pollutant Discharge Elimination System (NPDES) for stormwater discharges to the Piscataqua River, exceedances of permit conditions also must be reported to the EPA Regional Office. Local and State agencies, as described below and in Reporting and Notification Requirements Table, also may require notification of the release.

In accordance with 40 CFR 112.4 (a), if Newington Energy has (1) discharged more than 1,000 gallons of oil in a single discharge or (2) discharged more than 42 gallons in each of two discharges within any 12-month period that may be harmful to public health, welfare or the environment, they must submit to the EPA, within 60 days, the information specified in 40 CFR 112.4 (a) plus additional information if requested by the EPA. This information must also be forwarded to the DEP.

Federal Notification - Releases of Hazardous Substances

Releases of a hazardous substance (as defined in 40 CFR 302.4) exceeding CERCLA Reportable Quantities (ERP-00, Incident Discovery) must be immediately reported to the National Response Center (NRC) as soon as knowledge of the release is obtained. Releases of hazardous substances exceeding CERCLA reportable quantities, or extremely hazardous substances (EHS; as defined under federal EPCRA regulations 40 CFR 355) should also be reported immediately to the Local Emergency Planning Committee (LEPC) if any area outside the facility is to be affected. The State Emergency Response Commission (SERC) should be verbally notified if any areas of the state are likely to be affected.

In addition to the above, certain continuous releases of hazardous substances and/or air emission releases (from unpermitted minor sources and concentrations above permitted emissions limits due to accidents and malfunctions and/or during start-up and shut-down) may also be reportable under CERCLA and the Emergency Planning and Community Right to Know Act (EPCRA) as defined in 40 CFR 355.

Releases of 50 ppm or more of PCBs to surface water and sewers must be reported to EPA regional office in the shortest possible time, but no later than 24 hours, after discovery of the release.

Federal Notification - Health and Safety

The Occupational Safety and Health Administration (OSHA – 29 CFR 1904.8) requires that the fatality of one or more people or the hospitalization of three or more employees, is to be verbally reported to OSHA within 8 hours after knowledge of this information. Additionally, if the incident, whether or not it is immediately reportable, results in the death of an employee or the hospitalization of three or more employees within 30 days of the incident, the fatality/multiple hospitalization is to be reported within 8 hours of learning of it.

State Notifications - Releases of Oil or Hazardous Materials

PART Env-Wm 513 EMERGENCY/REMEDIAL ACTION

Env-Wm 513.01 Immediate Action.

(a) The generator shall report any discharge of hazardous waste or any discharge of a material which when discharged becomes a hazardous waste that poses a threat to human health or the environment, for example, into storm or sanitary sewers, onto the land or into the air, groundwater or surface waters:

(1) Immediately, not to exceed one hour from the discovery of the release, to local emergency officials; and

(2) Immediately, not to exceed one hours from the discovery of the release, to the NHDES. The generator shall comply with the emergency procedures as specified in 40 CFR 265.56, 7-1-99 edition.

Env-Wm 513.02 Discharge Cleanup.

(a) The generator shall immediately contain and clean up, within 24 hours, any hazardous waste discharge or any discharge of a material which, when discharged, becomes a hazardous waste.

(b) If the hazardous waste discharge cannot be or is not cleaned up within 24 hours, the generator shall submit a clean up plan to the department within 5 days of the discharge.

(c) The clean up plan shall:

(1) Provide for the protection of human health and the environment;

(2) Provide for the removal and proper disposal of the contamination source;

(3) Provide for confirmatory analysis of the potentially affected media, for example, soil, groundwater, or surface water, to demonstrate the clean up is successful; and

(4) Include a time table for completion of the clean up plan.

(d) The department shall review the clean up plan and approve it upon determining that the plan meets the criteria set forth in paragraph (c) above.

(e) The generator shall implement the clean up plan as approved by the department pursuant to paragraph (d) above.

(f) Within 30 days of completion of the clean up, the generator shall submit a report to the department detailing the actions taken.

(g) If the complete clean up can not be accomplished in accordance with paragraphs (b) through (f) above, the generator shall submit a scope of work proposal for site investigations pursuant to Env-Wm 1403 to evaluate the potential impacts of the release on soil and groundwater.

3.3 Annex 3. Response management system

3.3.a General

The National Fire Protection Association Incident Command System (ICS) guidelines (NFPA-1500) are the federal standard for command, control, and coordination of an emergency. ICS is based on five functional areas:

Command	Operations	Planning	Logistics	Finance

This appendix describes the five functional areas in a typical ICS, and the various roles within them. The specific roles and responsibilities under the NEL Emergency Response Organization (ERO), which is based on the ICS structure, are described in of the ICP. The Qualified Individual(s) identified in Section II of this plan have been designated as accountable for spill prevention.

3.3.b Command

GECS has designed an Emergency Response Organization (ERO) to meet the facility needs for emergency response under various staffing conditions. The ERO consists of personnel including First Responders (Control Room, First Responders,) and Environmental Health & Safety (EHS), as well as selected plant personnel.

The focal point of the ERO is the Incident Commander (IC). He/she is the individual who will direct an incident response. The Incident Commander will typically determine when off-site resources are needed, and is responsible for coordination of written incidents reports, and will keep senior management abreast of any major or sensitive situation related to an emergency. At least one of the individuals identified to function as the IC in Section II will be on-site at all times. The other individuals identified on the Response Team Contact List in Section II will fill in rolls as specified for the ERO.

During the preliminary stages of a response involving a significant petroleum release, GECS personnel will act as the Incident Commander as well as the Qualified Individual. The Qualified Individual is responsible for implementing oil removal activities from a significant release of petroleum. GECS personnel qualified to function as the Qualified Individual are identified in the Response Team Contact List in Section II of this ICP. The Incident Commander position will be passed up the line of authority as described in Section II 3 when an emergency expands or increases in complexity. GECS personnel will continue to function as the Qualified Individual upon the arrival of non-GECS personnel that would assume the Incident Commander position.

Individuals known as the First Responders, are responsible for initial assessment, determining whether addition resources are necessary, notifying the CONTROL ROOM of the need for additional resources, and conducting defensive actions, as appropriate. These individuals are typically responsible for determining whether the Emergency Coordinator should be contacted.

Emergency Coordinators are members of the plant management who are on call on a rotating basis in order to provide technical and regulatory guidance and support to the First Responders in emergency situations. The Emergency Coordinators are typically responsible for determining whether regulatory notifications are required. The Emergency Coordinator will also be responsible for completing all regulatory notifications.

GECS has an off-site Hazardous Waste Contractor on call 24 hours a day, 7 days a week. GECS also maintains a standing contract with a certified Oil Spill Response Organization (OSRO) to respond to large spills/releases. GECS's staff are trained, equipped, and permitted to clean up certain localized spills when they are available to do so. First Responders are also trained and equipped to conduct defensive measures to protect personnel, the environment, and property from the effects of a spill/release. The on-site Hazardous Waste Contractor and OSRO Contractor form the facility's HAZMAT Response Team.

The CONTROL ROOM serves as the major link between the Incident Commander, First Responders, Emergency Coordinator, and off-site resources. The

CONTROL ROOM mans the 24-hour on-site emergency number and makes the initial internal notifications, as well as summoning emergency assistance from outside resources, such as the Town of Newington, when necessary.

Personnel are assigned specific positions within the ERO based on their expertise and training. Individual positions may, or may not, be staffed at the discretion of the Emergency Coordinator. The EC always retains ultimate authority and responsibility when he or she delegates tasks to the rest of the ERO.

Emergency Response Organization Roles and Responsibilities

The key emergency response roles and responsibilities of the members of the ERO are described below. The GECS individuals assigned to each of the ERO roles are listed in the ICP Yellow Pages included at the beginning of Section II of this ICP.

During an emergency response, GECS personnel, regardless of whether they are members of the ERO, must follow the direction of the Incident Commander. Each employee may become involved in an emergency in many different ways, from recognition to clean up, with their particular roles dependent upon the situations and their level of training. The basic emergency response roles and responsibilities of GECS employees are briefly described below:

Individuals who handle hazardous substances and are trained to contain/control/ clean up an incidental spill/release can do so if it is limited in quantity and poses no emergency or significant threat to the safety and health of employees in the immediate vicinity. Incidental spills/releases are <u>not</u> considered an emergency response. Incidental spills/releases are those not considered to be significant as defined in Table 1 of Spill/Release Emergency Response Procedure (ERP-05), which is presented in Section II of this ICP. Incidental spills should be cleaned up by local operations and should not activate the emergency response system.

Any employee must be able to recognize a situation that requires additional assistance. The employee's responsibility is to activate the appropriate

alarm or call CONTROL ROOM, provide as much information as possible, and remain at a safe location until the First Responder(s) arrives.

CONTROL ROOM: This role is performed by Power Plant Personnel who man the CONTROL ROOM at all times. The CONTROL ROOM receives all emergency calls, gathers emergency information, and dispatches the First Responders to the location of the incident. The CONTROL ROOM serves as the communications focal point between the notifier, First Responder, off-site resources, and other ERO members. The CONTROL ROOM is responsible for logging all communications during each incident.

First Responder Team: Plant Power Plant Operations Personnel are the designated First Responders to be contacted by the CONTROL ROOM. Depending upon the nature of the incident and their availability at the time of the incident, not all members of the First Responder Team may respond to the incident. The First Responder is responsible for assessing the incident, determining if additional personnel and resources are necessary, determining what response actions are required, determining whether the EHS Primary Responders and/or Emergency Coordinator must be notified, conduct defensive measures to protect personnel, the environment, and property, and possibly determining the proper level of protection and/or equipment needed for additional responders.

Incident Commander: The person filling the role of Incident Commander may change during the course of an emergency situation as more senior (in terms of ERO authority as described below) personnel arrive on the scene. The Control Room will act as the Incident Commander of the First Responder Team. If the Control Room does not respond to the scene (unavailable or not needed), the other responders responding will direct the response. Beyond the First Responders, the Incident Commander role will be elevated (in order of their arrival at the scene) to the EHS Primary Responder and then the Emergency Coordinator. If the emergency requires the assistance of the Newington Fire Department, the Senior Officer on scene from the Newington Fire Department will serve as the Incident Commander. The GECS Incident Commander will wear a distinctive colored vest in order to be easily identifiable at the scene. The vest

will be passed between individuals if the GECS Incident Commander changes during an incident.

The Incident Commander will be responsible for coordinating and controlling all communications as well as the emergency response operations with the assistance of the ERO and other personnel participating in the response. The Incident Commander is also responsible for notifying the CONTROL ROOM to request assistance from off-site resources needed to respond to an emergency. The Incident Commander will also be responsible for determining when an emergency is terminated (after consulting with ERO personnel), coordinating/preparing any written reports on the incident, and conducting debriefings on the incident.

If additional assistance is <u>not</u> needed, the Incident Commander would implement actions to appropriately respond to the emergency, and would be responsible for seeing the incident through its end, including necessary written reporting. It is at the Incident Commander's discretion to call upon the Emergency Coordinator if the incident requires an expanded response.

Qualified Individual: The Qualified Individual (QI) has full authority, including contracting authority, to implement oil removal actions. The QI is responsible for the following duties:

- Activate internal alarms and hazard communication systems to notify all facility personnel;
- Notify all response personnel, as needed;
- Identify the character, exact source, amount, and extent of the release, as well as the other items needed for notification;
- Notify and provide necessary information to the appropriate Federal, State, and local authorities with designated response roles, including the National Response Center, State Emergency Response Commission, and Local Emergency Planning Committee;
- Assess the interaction of the discharged substance with water and/or other substances stored at the facility and notify response personnel at the scene of that assessment;

- Assess the possible hazards to human health and the environment due to the release. This assessment must consider both the direct and indirect effects of the release (i.e., the effects of any toxic, irritating, or asphyxiating gases that may be generated, or the effects of any hazardous surface water runoffs from water or chemical agents used to control fire and heat-induced explosion);

- Assess and implement prompt removal actions to contain and remove the substance released;

- Coordinate rescue and response actions as previously arranged with all response personnel;

- Use authority to immediately access company funding to initiate cleanup activities; and

- Direct cleanup activities until properly relieved of this responsibility.

HazMat Response Team: Individuals assigned to this team are trained to respond to on-site oil and/or hazardous material incidents that are beyond the capabilities of the individual(s) described above. This team is responsible for protecting, containing, stopping and/or cleaning up releases. This team consists of GECS's hazardous waste contractor, and the OSRO Contractor.

Spill response is organized with built-in redundancy and overlap in response times and response capabilities to cover the potential range of spills/releases that could occur at the NEL facility. The First Responders (on site 24-hours) will respond most quickly to a spill/release and have the capabilities to perform defensive measures. The GECS Control Rooms can respond just as quickly when available and have additional defensive and some limited cleanup capabilities. The HazMat Response Team consisting of the hazardous waste contractor and OSRO contractor (on call 24-hours to respond within 2 hours of notification) have additional and more extensive defensive and cleanup capabilities and on-site and off-site resources. Depending upon the nature of the incident, members of the HazMat Response Team may assist other members of the ERO as directed by the Incident Commander.

The Emergency Coordinator (EC) is the plant individual designated by GECS who has the authority and responsibility for directing an expanded

emergency response. The EC is assisted by the members of the ERO, and is responsible for liaisons with the Qualified Individual and GECS management regarding emergency response activities. In addition to the ERO, the EC has the authority to draw upon and direct any GECS personnel and GECS resources to respond to the emergency. The EC is also GECS's point of contact with appropriate federal and local agencies in the event of a spill response action.

The EC shall notify and coordinate with the Qualified Individual (QI) when the emergency being responded to (pursuant to this ICP) is a large spill/release of petroleum product, results in a fatality, and/or involved property damage. Both the EC and QI have been trained to implement this ICP for an oil spill response, and the QI has been given the authority to meet the legal and regulatory requirements of the Oil Pollution Act of 1990 (OPA-90).

GECS understands the mandated role of the Federal On-Scene Coordinator (OSC) in an oil spill response action. The OSC, who is a federal employee pre-designated by the regional or district head of the lead agency, can direct spill response efforts and can coordinate other related emergency efforts at the scene of a discharge or release. This ICP considers the OSC to be NEL' liaison with the Area or Regional Contingency Plans in the event of a major spill/release event for which the OSC requests control from the GECS Emergency Coordinator.

In this role, the OSC can coordinate, direct and review the work of other agencies, responsible parties, contractors' agencies, and contractors to assure compliance with the National Contingency Plan (NCP), decision document, consent decree, administrative order, and lead agency-approved plans applicable to the response. However, while a GECS response is under the control of the EC/QI, GECS will maintain responsibility for coordinating with relevant agencies. This responsibility includes:

- creating information distribution lists;
- scheduling government briefings;

- establishing required files and reports;
- coordinating the flow of information into and out of the incident;
- following up on support requests from government agencies; and,
- being available to respond to agency concerns before they become public issues.
- Assess and monitor the extent of the emergency situation, including character, exact source, amount and interaction with water or other substances stored at the facility, possible hazards to human health and the environment created by the incident, and potential for leaks, pressure build-up, gas generation and ruptures.
- Alert plant personnel, formulate and direct protective actions.
- Mobilize, implement and manage the ERO as needed to anticipate and proactively accomplish the response.
- Activate the on-site Emergency Operations Center (EOC) if required.
- Assess priorities.
- Determine strategic goals and tactical objectives.
- Direct the implementation of appropriate response procedures, including the proper treatment, storage and disposal of any wastes generated.
- Anticipate response needs and authorize the ordering, deploying and demobilization of response resources (contractors and equipment).
- Serve as the ultimate safety authority, approve the safety plan, and ensure the maximum achievable level of responder safety.
- Coordinate actions with Local, State, and Federal Agencies and contracted responders.
- Coordinate protective actions for the public, as appropriate.
- Authorize information releases to the media and participate in scheduled press conferences.

Local Emergency Response Organizations

In addition to the procedures described above, GECS personnel are in regular contact with local and other emergency agencies and organizations. In the event that a

release occurs or an emergency response involves hazardous waste, GECS expects that the Town of Newington emergency agencies will respond in the capacity that they have been charged (e.g. Fire Department response to a facility fire and Police Department acting to facilitate evacuation). In addition, GECS has identified Portsmouth Regional Hospital as the local hospital to receive injured employees or response personnel as a result of an emergency related to a hazardous waste release or response.

Copies of this plan have been distributed to the following local agencies:

- New Hampshire DES;
- Newington Fire Department;
- Newington Police Department;
- Newington Local Emergency Planning Committee;
- Portsmouth Regional Hospital;
- US EPA Region I; and
- US Coast Guard.

In the event that the content of the plan changes significantly, modified portions of the plan will be provided to the appropriate agencies. The agencies are invited to comment and recommend modification to this plan if they determine that they would be unable to respond as described. If no comments or recommendations are received from those agencies, it will be assumed that they agree to the level of response as described in this plan. If any agency or organization listed above refuses to enter into an arrangement with GECS, that refusal will be documented by the facility.

3.3.b.1. Facility Incident commander and Qualified Individual

The facility Incident Commanders and Qualified Individuals are identified in the Yellow Pages located in the beginning of Section II of this ICP. The responsibilities and duties of these individuals are described above in Section III 3.b.

All response personnel identified as Incident Commanders and Qualified Individuals have received at least 24 Hr Hazwoper training. Those personnel also have previous power plant experience and training.

3.3.b.2. Information

Information is communicated at the NEL facility using a simple and straightforward communications system for normal operations on the site as well as for emergency response. The system includes a telephone network, two-way radio communications systems, and automated alarm systems.

Telephone System: The normal facility telephone system consists of an integrated on-site network, with phones located in all office areas. Incoming calls are routed through and automated attendant (Voice-mail system). The administrative assistant monitors the switchboard during normal working hours. During off-shifts, incoming calls to the switchboard ring at the Control Room Desk console. Outgoing calls can be dialed directly from certain phones at the facility or through the Control Room Desk console.

The site telephone complex is located in the administration building. The complex is equipped with a Uninterrupted Power Supply (UPS) for continued operation in the event of loss of power. If the UPS fails, a separate/standalone phone is available in the control room. In addition, key members of the ERO have cellular phones available to them.

During an emergency, the site phone system would function as a primary means of emergency communications. The central communications point in an emergency is the Control Room Desk console. Communications equipment available at the Control Room Desk console includes three (3) telephones.

1. On-site network multi-line phone

2. Commercial single-line phone

3. Automated ring down line to Electrical Grid Operator (ISO)

The multi-line phone, which is part of the on-site network, is used for routine calls and may be used for emergency notifications. A second multi-line phone is also available for incoming calls to the plant switchboard after normal working hours. This phone may also be available for emergency communications and notifications. The commercial single-line phone is independent of the on-site phone system. This phone serves as a backup phone for notifications in the event of a failure of the on-site phone network.

Radio Communications: The Control Room Desk console is equipped for radio communications. GECS uses three primary radio channels for normal plant operations. Three base stations on the console allow two-way communications on the (1) Operations, (2) Maintenance, (3) Spare, and (4) Direct, in case the on-site signal repeater fails.

First Responders (Control Room, First Responders) carry hand radios at all times to communicate with the Control Room Desk console, each other, and personnel in their respective organizations. A total of 21 radios are in use. The following radio frequencies are in use at the facility:

Radio Frequencies in Use at NEL				
Channel Type	**Tx**	**Code**	**Rx**	**Code**
1 Repeat	456.900	565	451.900	412
2 Talk Around	451.900	412	451.900	412
3 Simplex	451.575	244	451.575	244

In addition, the First Responders have a radio equipped to communicate directly with the Newington Fire Department.

Alarm Systems: The facility central fire alarm system shall consist of a Main Fire Alarm Control Panel (MFCP) to supervise all automatic and manual

fixed fire suppression and detection systems and provide common fire and trouble signal from Local Fire Alarm Panel (LFAP).

Alarm signals shall be initiated in response to activation of water flow or pressure switches from local fire protection systems. Trouble signals shall be initiated in response to activation of tamper switches, faulty devices, or break in supervisory circuits.

All supervisory circuits shall be closed loop types to identify wiring faults or system malfunctions, and will be communciated by a trouble signal at fire alarm panels.

Visual alarms shall be provided at a centralized location in the plant area, and at the fire alarm panel.

Audible alarm horns shall be provided at a centralized location in the plant area, and at the fire alarm panel. Audible alarms shall be compatible with the environment in which they are located, to insure the signal is clearly audible above ambient noise levels

3.3.b.3. Safety

The Incident Commander has control over safety during an Emergency Incident. The following Environmental Health and Safety activities will be completed by EHS Responder and other EHS personnel during an emergency as specified in ERP-03, Emergency Evacuation Procedure:

- patrol the area at a safe distance to identify additional safety and environmental hazards;
- provide feedback to First Responders on the necessity of further evacuation needs; and
- assist in keeping people away from the evacuated area until the "all clear" signal is given by the Incident Commander.

The Incident Commander is ultimately responsible for the safety of responders as described above. The Safety Officer, as described above, would provide input and information to the Incident Commander related to responder safety.

During an evacuation, if determined to be safe by the Incident Commander, Emergency Responders may remain or return to the scene to complete operations consistent with response activities described in ERP-005, Spill/Release Procedure. Those activities may include:

- Securing the scene;
- Closing valves and securing systems;
- Spill Clean-up; and
- Assisting Emergency Medical Staff (EMS) Staff.

3.3.b.4. Liaison –Staff Mobilization

The Incident Commander will coordinate mobilization between internal and external response teams, if necessary. Coordination with local authorities will be completed by the Incident Commander or delegated to Newington Energy personnel as specified in the Reporting and Notification Requirement Table included in Appendix B of this ICP.

3.3.c Operations

The chief of the operations function is the ***Operations Section Chief***. The EC may assign to the Operations Section Chief the responsibility for implementing and managing operations section activities for the response. Specific responsibilities include:

- Assisting the planning section in defining strategic response goals and tactical operations objectives.
- Developing detailed mission assignments, and scheduling duty lists and operational assignments to accomplish the strategic response goals and tactical operations objectives.

- Identifying additional resources required and recommending to the EC excess resources which can be released.

- Evaluating and reporting to the EC on a continuing basis the effectiveness of response activities.

The operations section is responsible for the following job functions, which the Operations Section Chief may delegate to an operations staff as follows:

HAZMAT Team Leader Plans and executes HazMat operations, directs the HazMat teams, designates exclusion zones, investigates HazMat hazards, and conducts environmental monitoring.

Firefighting Team Leader Assists the Town of Newington Fire Department with firefighting operations, but does not perform firefighting beyond the incipient stage. Assists in coordination of the Town of Newington firefighting support teams to accomplish tactical objectives and protect nearby building, structures or equipment. Also identifies firefighting resources and logistical support needs and investigates fires.

Emergency Medical Team Leader Plans and executes EMS operations, directs EMS teams, coordinates with outside EMS resources and identifies logistical needs. Ensures that information on potential contamination of injured personnel and applicable MSDSs are provided to outside medical resources prior to personnel transport off-site.

Recovery Team Leader Plans and organizes spilled material recovery operations. Directs the personnel and equipment to accomplish recovery and cleanup, identifies logistical needs, and projects cleanup completion.

Protection Team Leader Identifies resources and logistical needs to accomplish protection of sensitive receptors such as nearby institutions, residents or environmental resources. Directs the deployment and maintenance of booms, dikes or other protective devices; proposes

alternative strategies based on an on-going assessment of protective action effectiveness; and provides reports to the Operations Section Chief or EC.

Disposal Team Leader Plans and implements temporary storage, transport, recycling and disposal of recovered wastes; sets up and monitors temporary storage sites and prevents secondary releases from them; ensures adequate capacity is available for temporary storage, transport and disposal; plans, organizes and directs decontamination activities.

Security Team Leader Develops and implements the incident security plan, coordinates and conducts physical security operations, liaises with additional security resources required.

At the NEL facility, the operation functions typically are conducted by the First Responders and the HazMat Response Team, as described above in Section III 3.b. The EC can designate outside resources to assist with certain activities described above for a specific response action.

3.3.c.1. Operational response objectives

Operational response objectives are defined in Section II 2.d. of this ICP. Related procedures to operational response are provided in Section II 2. of this ICP.

3.3.c.2. Discharge or release control

Discharge/release control is detailed in ERP-05, Spill Release Procedure. The Emergency Response Contractor that would respond to a Worst Case Discharge would be Clean Harbors.

3.3.c.3. Assessment/monitoring

The Incident Commander/Qualified Individual is responsible for assessing and monitoring for the materials involved in the emergency incident. Newington Energy maintains the following equipment in order to complete monitoring to assess potential impact to the health and safety of workers and the public:

- MSA 5 Star Multigas meters (Carbon Dioxide, Oxygen, Lower Explosive Limit, Hydrogen Sulfide, and Ammonia); and
- MSA Quickdraw (colorometric tube kit with various detector tubes).

MSA 5 Star Multigas meters will be tested daily using a known gas standard.

3.3.c.4. Containment

Stationary containment structures have been provided for bulk oil and chemical storage structures at the facility. Appendix D provides a description of the type and characteristics of the secondary containment for each of the oil and hazardous material storage units (tanks or other type of storage area) at this facility. Information provided in this ICP related to containment structures, including calculation of volume capacity, has been provided by GECS.

Detailed descriptions for containment related to off-loading and associated drainage has been included in Section III 1.c., Facility Description/layout.

Portable containment will be deployed in instances where response equipment is available to stop further progression of a released material during an

emergency incident. Available equipment for providing portable containment is identified in the Emergency Response Equipment table provided in Appendix H.

3.3.c.5. Recovery

Whenever possible, product or chemicals will be pumped back into product storage if it meets applicable specifications. Residue and contaminated soil will be removed by a licensed contractor which will present a manifest to the OSC. More details related to disposal of product or chemicals that can not reused are provided in Section III 3.d.4, Waste Management.

3.3.c.6. Decontamination

In most instances, Newington Energy personnel will respond defensively to releases of hazardous materials. However, the potential exists that employees or equipment may come in contact with hazardous materials and therefore would require decontamination. The following sections describe decontamination procedures for employees and equipment.

Personnel Decontamination

Anyone who handles spilled material and encounters spilled material on their skin or clothing should be decontaminated immediately. Based on the types of materials handled and stored at the facility, most personnel decontamination can be completed using the following basic decontamination procedures.

Common Sense Techniques – When performing basic decontamination, the goals, as well as the tasks needed to accomplish those goals, should be kept simple. There are "common sense" techniques that could be used to help protect the health and safety of all personnel involved and to prevent the spread of the hazardous material. Some of the "common sense" techniques to be considered are the following.:

1. Check your own hands and feet (both should be protected upon arrival of the incident) for any signs of contamination.

2. Observe each other. Do a complete visual check of other personnel for signs of contamination. If a substance is noted, do

not touch, but rather, wait until decontamination procedures can be employed.

3. If you are unsure that any piece of protective clothing of equipment has been completely decontaminated, carefully remove articles and leave them behind to be properly collected. Employee safety comes first, equipment can be replaced.

4. While decontaminating, avoid direct contact with the contaminated item.

Brush Off Method – Basic decontamination can be accomplished using several different methods. Since you should not come in direct contact with the contaminated item, brooms, sponge mops, dust mops, and other such utensils can be used to brush off the material or apply cleaning agents. Brushing off the material, from a contaminated person or piece of equipment, could eliminate the need for further decontamination. The material that is brushed off should be collected in plastic or polyfilm sheeting.

Hose Off Method – Another method of basic decontamination requires a hose line and catch basins. The individual to be decontaminated is directed in a diked or basin area. The diked or basin area will prevent runoff and will divert the material to a safer area for later treatment and disposal.

If the contaminated individual must be assisted, such assistance must be given with a minimum of direct handling until decontamination is completed. As much distance as possible should be placed between contaminated personnel and workers conducting decontamination.

The contaminated individual is then "hosed off" using dilution with water to flush the hazardous material from protective clothing and equipment. Firefighters can use this method without requiring specialized equipment. Water is readily available and can be used liberally. A support line or garden hose with high pressure, low volume will remove a large percentage of gross

contaminants. By lowering water pressure, the chances of overspray or splashing will be minimized.

The Incident Commander/Qualified Individual will make the determination if response activities would require individuals exposed to hazardous materials at the facility to require more that the basic decontamination described above.

Equipment Decontamination

Equipment decontamination will be evaluated upon termination of the emergency incident and response activities. The Incident Commander/Qualified Individual will make the determination whether equipment may be decontaminated and salvaged or disposed as described in Section III 3.d.4.

3.3.c.7. Non-responder medical needs

Generally, emergency medical service (for responders and non-responders) will be provided by the Newington Fire Department. If necessary, injured personnel will be transferred to a local hospital (see Emergency Phone List in Section II of the ICP), with the Portsmouth Regional Hospital in Portsmouth serving as the primary hospital for the facility. If necessary, ambulance service will be requested during contact with the Newington Fire Department. The local hospitals are modern facilities, equipped and staffed to handle emergency trauma.

The hospitals are large enough to handle several injured personnel at a time. If the injured personnel were or might have been exposed to hazardous chemicals, the First Responders will ensure that the hospital is notified in advance of transport of contaminated injured individuals, and that the appropriate MSDS, or other such information, is made available to the hospital emergency room personnel.

3.3.c.8. Salvage Plans

This ICP has been developed to meet the emergency response requirements for the regulatory programs described in Section I 1. of this ICP. There are no requirements for this ICP to include information on Salvage Plans based on the regulatory programs that are applicable to Newington Energy.

3.3.d Planning

The chief of the planning function is the ***Planning Section Chief***. The EC may assign to the Planning Section Chief the responsibility for implementing and managing planning section activities to proactively accomplish the response. Specific responsibilities include:

- Anticipating the need for status information about incident response and proactively managing the system to gather and disseminate information required.

- Developing a detailed incident action plan based on projected response.

- Evaluating alternative strategies and tactical operations on a continual basis and making recommendations to the EC.

- Recommending changes to GECSs ERO organization to best support the implementation of the action plan.

The planning section is responsible for the following job functions, which the Planning Chief may delegate to a planning staff as follows:

Health and Safety Planner Identifies and evaluates health and safety hazards that may impact responders and the public; designates exclusion zone boundaries; assigns levels of personal protective equipment (PPE) required; writes and updates the site safety plan; monitors environmental conditions; ensures responders are properly trained, briefed and protected; and liaises with public health authorities regarding public health concerns and protective actions.

Strategic and Tactical Planner Develops and updates strategic response goals, tactical objectives and protection strategies for the action plan; prepares and evaluates alternative response strategies and makes recommendations to the section chief or EC on a continual basis; and identifies additional resources, agencies or individuals that should be brought into the ERO.

Natural Resources and Wildlife Planner Identifies and forecasts potential impact on wildlife and natural resources (identified in Sensitive Area Planning and Vulnerability); evaluates and recommends changes to protection strategies based on natural resource threats; identifies resource and logistics requirements for capture, triage, care, transport and release of wildlife; and documents natural resource and wildlife injuries.

Demobilization Planner Plans for the demobilization of personnel and equipment.

3.3.d.1. Hazard Assessment

Bulk Oil Releases

In accordance with 40 CFR 112.7, it is reasonably possible that a spill event could occur at the facility. This section presents potential spill sources, potential spill scenarios, and potential causes of spills at the Station. In addition, this section addresses the U.S. Environmental Protection Agency (EPA) defined small, medium, and worst case discharges (40 CFR 112.21(h)(5) and Appendix G).

Included in Appendix D is a table (Petroleum ASTs) summary of potential spill sources at the facility, spill scenarios, and general flow directions (refer to Section III 1.c. for details regarding spill flow direction and containment). The defined and/or calculated EPA discharges are also summarized in the above referenced table (calculations are presented in Appendix F, EPA Worst Case Discharge Planning Volume). In addition, the Applicability of Substantial Harm and associated certification has been included in Appendix P.

This section describes the Worst-Case Discharge (WCD), as well as the Small and Medium discharges, as appropriate for onshore storage (non-transportation related) activities at the Newington Energy facility. The definitions of each of these terms can be found below, and supporting calculations for the volumes described in this section are presented in Appendix G, Small, Medium and Worst Case Discharges**.**

Worst Case Discharge (WCD)

The worst case discharge for the onshore storage tanks (non-transportation-related), based on the fact that all aboveground tanks have adequate secondary containment and that the nearest opportunity for discharge is adjacent to a navigable water, is equal to the capacity of the largest single aboveground tank within a secondary containment area. The volumes determined for the onshore storage facility are primarily based on the one (1) bulk low sulfur No 2 fuel oil tank. Therefore, the Newington Energy facility's **WCD is equal to 939,451 gallons, or 22,368 barrels** (the total volume of the No 2 fuel oil AST - Tank 21).

Travel of a worst case discharge from a tank rupture beyond secondary containment would be to the Piscataqua River. The WCD would be influenced by the elements as described below. It is unlikely that a WCD would result in a chain of failures at the facility.

Response to and remediation of a worst case discharge would be handled by Newington Energy's OSRO contractors identified in Section II of this ICP. The nearest sensitive areas are identified in Appendix C.

Medium Discharge

A medium volume discharge for non-transportation-related facilities is defined as any spill volume exceeding 2,100 gallons (50 bbls) but less than 36,000 gallons, or 10 percent of the capacity of the largest aboveground tank, whichever is less. 10 percent of the largest aboveground tank at Newington Energy's facility is 101,516 gallons or 2,417 barrels. Therefore, it has been determined that the facility's **Medium Discharge is equal to greater than 2,100 gallons (50 bbls) but less than 36,000 gallons (860 bbls).**

A typical medium spill at the facility with a volume as large as 36,000 gallons could potentially be caused as a result of a tank or pipe rupture, a tank overfill, improper maintenance, or other scenarios as identified in the AST Inventory Table provided in Appendix D. Travel of a medium case discharge would be contained within buildings, enter the facility waste water collection/treatment system, or would enter the facility storm water drainage system/retention basin.

Travel of a spill beyond secondary containment or off-site is not likely unless the secondary containment structures also fail. The flow path of the release will be determined by the location of the equipment and the general contour of the area surrounding the release. A chain reaction of failures is not considered to be probable.

Response to and remediation of a medium case discharge would most likely be handled by Newington Energy's OSRO contractors. The nearest sensitive areas are identified in Appendix C.

Small Discharge

A small volume discharge for non-transportation-related facilities is defined as any spill volume less than or equal to 2,100 gallons (50 bbls), but not greater than the WCD. The Newington Energy facility's **Small Discharge is equal to 2,100 gallons or 50 barrels.**

A typical small spill at the facility with a volume as large as 2,100 gallons could potentially be caused as a result of a tank or pipe rupture, a tank overfill, improper maintenance, or other scenarios as identified in the AST Inventory Table provided in Appendix D. Travel of a small case discharge would be contained within buildings, enter the facility waste water collection/treatment system, or would enter the facility storm water drainage system/retention basin.

Travel of a spill beyond secondary containment or off-site is not likely unless the secondary containment structures also fail. The flow path of the release will be determined by the location of the equipment and the general contour of the area surrounding the release. A chain reaction of failures is not considered to be probable.

Response to and remediation of a small case discharge would most likely be handled by Newington Energy's Emergency Responders. If needed, Newington Energy's OSRO contractors will be contacted to assist with response and removal. The nearest sensitive areas are identified in Appendix C.

A table for Bulk Oil Release Response related to Small, Medium and Worst Case Discharges has been included in Appendix G.

Potential Cause of Spill Discharges

The following sections describe the likelihood of release of petroleum product at the facility:

Equipment Failure

A spill could occur at the facility due to the failure of a number of different types of equipment. These include a leaking pipe or valve, valve failure, transfer piping hose leak, overfill, or rupture. The potential for equipment failure and/or the release of product due to an equipment failure is minimized through implementation of routine maintenance, a regular

inspection program, and spill preparedness and planning. Equipment components including those noted in Appendix D could fail due to age (including tank age).

Site Location

The Station is not located near any major mapped fault zones and is unlikely to experience a release due to an earthquake.

Natural Disaster

A spill could occur due to a natural disaster such as a hurricane or fire. However, there is a low probability for a spill to be caused by natural disaster. Storm-induced spills are protected against through the use of appropriate construction materials for tanks and secondary containment structures. Fire protection equipment (foam system, sprinklers, fire extinguishers, etc.) is in place to limit the spread of a fire that might contribute to a spill event.

Human Error

Spill discharges could occur at the facility due to human error. Newington Energy employees undergo annual training in spill prevention, spill response, and general operations and procedures. The training procedures are designed to maintain a low potential for a spill due to direct human error. A high level of employee training is the best defense against human-error induced spills. In addition, routine meetings are held to review and discuss spill prevention procedures, safety, and measures to be taken in the event of a spill.

New employees are scheduled to work introductory shifts with appropriate personnel in order to familiarize themselves with facility operations and procedures. New employees are familiarized with valving and transfer piping, handling of product transfers, tracing product lines, the facility's fire protection system and equipment, pollution abatement systems, discharge prevention laws and regulations, and person in charge requirements.

Oil Spill History

As a new facility, there have been no oil spills at the facility. Future spills will be documented using GECS Incident Reporting system.

Horizontal Range

It is unlikely that a spill release at Newington Energy would travel beyond the property boundary. If a release were to reach the Piscataqua River, it is expected that the release would be contained within a limited travel distance.

Tank Age

It is unlikely that tank failure will occur as a result of tank age since the facility is new and the majority of tanks have been newly constructed. In addition, all of the tanks receive routine inspection and maintenance. Tanks undergo daily and monthly visual inspections and are also scheduled for periodic integrity testing.

Potential Influences to Spill Flow Direction

In the unlikely event of a significant release at the facility, product could reach the Piscataqua River. A spill which reaches the River will flow according to wind and water currents. The following sections present potential influences to spill flow direction outside of secondary containment.

Relevant Wind and Tidal Information

Petroleum products move as result of wind and water currents. It is commonly assumed that petroleum products move with the wind at approximately three to four percent of the wind velocity. When the wind velocity is low or wind is absent, petroleum products will tend to move with the current at about the same velocity and in the same direction as the current. When the wind is blowing, the product will be affected by both water and wind currents, and the movement of the product will be a function of both

forces. If the wind direction is opposite to the current, the wind can reduce or reverse the water velocity at the surface.

Tidal influence results in two (2) high tides and two (2) low tides in a diurnal pattern. The range of tidal fluctuation at the facility is approximately 8-11 feet. A complete tidal current reversal, associated with tidal fluctuations, occurs approximately every twelve (12) hours.

Weather

Typical spring and summer weather is light breezes in the morning and brisk winds (10 to 15 kts) in the afternoon usually diminishing at dusk. As the day progresses, the prevailing southwest wind becomes stronger as it travels over the water. Occasional brief thunderstorms in the summer can bring winds gusting to 50 kts. In the fall, one can expect northeast storms lasting up to three (3) days with high winds and cold rain.

Anhydrous Ammonia Releases

An off-site consequence analysis was completed for the anhydrous ammonia system as part of the electronic registration process with the EPA for RMP. Detailed information related to that analysis is provided in the RMP/PSM Manual.

In addition, a detailed hazard review and process hazard analysis were completed for the anhydrous ammonia system. Similarly, that information was incorporated into the RMP/PSM Manual.

Environmental and nearby sensitive resources have been identified in Sensitive Area Planning and Vulnerability, included in Appendix C. A Vulnerability Analysis has also been included in Appendix C.

3.3.d.2. Protection

Newington Energy has identified objectives, goals, and priorities to protect the public, Newington Energy personnel, the environment, and the facility property in Section III Annex 3 c., Operations. In addition, procedures have been developed, including ERP-01, Incident Assessment and ERP-05, Spill/Release Procedure, to describe protection activities that will be completed during an emergency response.

In addition to the procedures described above, physical structures, such as containment and drainage systems, have been constructed and designed to protect people, the environment, and the facility from potential exposure to hazardous materials.

Newington Energy has resources for emergency response, including facility personnel and contractors, as well as dedicated emergency equipment. The response management plan has been designed to bring planning, personnel, and equipment together to accomplish emergency response.

Specific procedures to accomplish proactive protection for spill prevention are provided in Section III Annex 7 including:

- Discharge Detection System;
- Protection for Spill from Mechanical Failure;
- Protection for Spill from Human Error;
- Secondary Containment;
- Material Compatibility;
- Maintenance Activities;
- Housekeeping; and
- Security.

3.3.d.3. Coordination with natural resource trustees

The ICP is consistent with the National Oil and Hazardous Substance Pollution Contingency Plan and applicable Area Contingency Plans. The plan is coordinated with the local emergency response plan.

3.3.d.4. Waste Management

Upon the termination of an emergency incident involving a hazardous materials, the Emergency Coordinator will evaluate and characterize the waste generated during the incident. Samples of all collected material will be secured during and after clean-up operations are completed. The samples will be tested by a certified laboratory and disposal and recycling options will be determined on the basis of the results. Factors to be considered include:

- amount of collected material;
- purity (potential for re-use) of collected material;
- cost of recycling vs. disposal; and
- permits required to transport or dispose of recovered material.

Whenever possible, product or chemicals will be pumped back into product storage if it meets applicable specifications. Residue and contaminated soil will be removed by a licensed contractor which will present a manifest to the OSC. Newington Energy's contracted OSROs provide temporary disposal capabilities and complete disposal services in accordance with federal, state and local regulations. Response equipment, personnel protective equipment, decontamination solutions, absorbents, spent chemicals, etc. will be evaluated to determine whether those materials can be reused or would need to be disposed. Decisions on the ultimate fate of the above described materials will be made in consultation with the spill clean-up contractor and, when appropriate, with the EPA and local authorities.

The facility does not routinely generate hazardous waste and does not anticipate obtaining an EPA Hazardous Waste Generator Identification Number. In the event that hazardous waste is generated during a response event, the New

Hampshire Department of Environmental Services (DES) will be contacted in regard to shipping using a temporary Emergency Permit number that will be issued over the phone.

During collection and disposal operations, mobile equipment, including fractionalization tanks and tank trucks, could be set up by Newington Energy and/or the primary OSRO. The staging of these facilities and equipment during a recovery and disposal operation would be dependent on the nature and location of the incident.

Newington Energy will coordinate with the OSRO and/or spill contractor for transportation and off-site waste disposal at an approved disposal site.

3.3.e Logistics

The chief of the logistics function is the ***Logistics Section Chief***. The EC may assign to the Logistics Chief responsibility for implementing and managing logistics section activities to proactively accomplish the response. Specific responsibilities include:

- Ensuring the prompt delivery of resources to support response operations. Early emphasis on delivery of heavy response equipment and personnel, providing communications resources, and the continuous need for support services are the highest priority of the logistics branch.
- Anticipating, coordinating, and proactively managing requests for additional resources and logistics support.
- Managing, documenting, supporting and anticipating the need for response resources, equipment, personnel and services.
- Developing logistics alternatives to support Planning and Operations Section missions.

The logistics section is responsible for the following functions as described in the following sub-section, which the Logistics Chief may delegate to a logistics staff:

3.3.e.1. Medical needs of responders

Generally, emergency medical service (for responders and non-responders) will be provided by the Newington Fire Department. If necessary, injured personnel will be transferred to a local hospital (see Emergency Phone List in Section II of the ICP), with the Portsmouth Regional Hospital in Portsmouth serving as the primary hospital for the facility. If necessary, ambulance service will be requested during contact with the Newington Fire Department. The local hospitals are modern facilities, equipped and staffed to handle emergency trauma.

The hospitals are large enough to handle several injured personnel at a time. If the injured personnel were or might have been exposed to hazardous chemicals, the First Responders will ensure that the hospital is notified in advance of transport of contaminated and/or injured individuals, and that the appropriate MSDS, or other such information, is made available to the hospital emergency room personnel.

3.3.e.2. Site security

Access to the facility is controlled by fences, Control Room personnel stationed at the gates, and/or by electronic security devices. The NEL facility is equipped with two gates. Normal access to the NEL facility is limited to the main gate from Industrial Corridor Road. There is a card reader system for secure access of plant staff members. There is an intercom and surveillance camera at the main gate for controlled access of visitors, guests and contractors. The main gate is controlled as described above, 24 hours/day, 365 days per year, including all holidays.

The NEL facility is illuminated with flood lights and other security lighting which enable detection of potential releases and deter trespassing, burglary and vandalism. The facility perimeter is also patrolled daily by operations personnel. Any detection of vandalism, theft, etc. would be determined during daily operations. If necessary, temporary measures would be

taken to secure perimeter fencing and permanent repairs would be conducted as soon as practicable or manned when opened.

The NEL facility receives no unmanned deliveries and all pipeline receipts are monitored by facility operators at all times. All primary product valves (tank valves, etc.) are securely locked in the closed position when they are in a non-operating status. The starter controls for all pumps on-site are set in "off' positions, and these controls are located where only authorized personnel may access them. Tank water draw-off valves are maintained in the locked position, as applicable.

3.3.e.3. Communications

Detailed information related to the phone systems, radio communications, and alarm systems is provided in Section III 3.b.2, Information. Those systems will be used as appropriate during emergency response activities.

Information related to early release warning of anhydrous ammonia is provided via process control systems. Those process control systems monitor pressure, temperature, and chemical levels to acknowledge acceptable operating parameters. Alarms linked to the process control systems would be triggered to indicate to employees and operators that the system is not be operating correctly.

3.3.e.4. Transportation

The site has one (1) dedicated over-the-road vehicle. This vehicle is not to be used to transport an injured person to a emergency medical care facility. Call EMS (911) for an ambulance. Boats are owned and operated by either emergency response contractor or a maintenance contractor. All safety rules apply while riding in these vehicles. GECS employees are not to operate vehicles owned by contractors, vendors or visitors.

3.3.e.5. Personnel support

Personnel that may be asked to respond in the case of an emergency at the NEL facility have been described in this ICP. Notification information for outside resources that could support an emergency response included in this ICP is

summarized in this ICP. The Incident Commander can use this information to call out the necessary resources required to address the particular emergency. Additional support for items such as meals, lodging, restrooms, equipment ,etc.. will be contracted with prior to their need as much as can be anticipated.

3.3.e.6. Equipment maintenance and support

In house maintenance will address as much equipment maintenance and support as feasible and other maintenance activities will be contracted out. The vast majority of equipment and processes have detailed maintenance and inspection procedures, these will be followed and where required, documented. Emergency Response Equipment is maintained by the Emergency Supply Director and the OSRO Contractors. An inventory of Emergency Response Equipment is included in Appendix H.

Personal Protective Equipment (PPE) will be maintained by members of the on-site emergency response team. A list of facility PPE has been included in Appendix I.

The Emergency Coordinator and/or his/her designee will include a review of the status of on-site emergency equipment, supplies, and PPE as part of the annual ICP review/update. This includes an inventory and inspection of the on-site equipment listed in Appendix H, as well as identification of any major changes or deficiencies noted since the last review. The review will also document emergency equipment used or consumed during drills or actual emergency situations.

All facility communications or alarm systems, fire protection equipment, spill control equipment, and decontamination equipment are tested and maintained as necessary to ensure its proper operation in time of emergency. Testing and maintenance is performed and records maintained as follows:

- Communications equipment is routinely used and maintained as necessary with records of systems testing maintained at the

telecommunications office. Fire alarms are tested during evacuation drills and records are maintained by the fire alarm electrician.

- Fire protection equipment is routinely tested and records maintained by the Fire Inspectors. Drawing 5 includes detailed information on water and foam suppression systems available at the facility. Specifically, 600 gallons of foam is available at the foam house. Foam can be delivered to the tanker off-loading area, foam cannons, and bulk tank (see Drawing 5 - Notes 13, 17, & 18). Portable foam extinguishers or systems are not available at the facility. An inventory of hand fire extinguishers is included in the inspection logs in Appendix Q. The location of the extinguishers is included on Drawing 6. The extinguishers are inspected monthly. There are no wheeled fire extinguishers at the facility. A total of eight (8) standard water fire hydrants are located at various locations at the facility.

- Spill control equipment is inspected and records maintained as indicated below.

- Decontamination equipment (eyewash and emergency showers) are tested weekly and records are maintained in the areas of responsibility.

The limited on-site spill response equipment is inspected periodically. The response equipment inspection is used to check the following (Response Equipment Checklist):

- Inventory (item and quantity)
- Storage location
- Operational status/condition

Any discrepancies between the list and the actual equipment are noted. A Response Equipment Inspection Log is filled out after each inspection and action is taken to correct any detected discrepancies. Records of these inspections are maintained in the facility's EHS files.

Emergency response equipment for oil releases is deployed and operated as specified during training drills as described in Section III 5 of this ICP. Only a representative sample of each type of equipment need be deployed and operated. GECS will require documentation from their spill contractor(s) (OSROs) to identify equipment that is tested and deployed to ensure equipment functionality during an actual release. The spill contractor also shall provide inspection and maintenance information to GECS.

The facility's OSRO is also required to routinely inspect and maintain the off-site spill response equipment (i.e., boats, vac-trucks, etc.) that is being committed to the facility. Relevant information and results regarding the inspection and testing of contractor spill response equipment that would be used for this facility will be provided to the Emergency Coordinator by this facility's OSRO, and are maintained in the facility's EHS files.

Specific equipment inspection and testing as well as correction of deficiencies related to the anhydrous ammonia system is described in detail in the RMP/PSM Manual.

Details related to inspection of Aboveground Storage Tanks (ASTs) containing petroleum products and associated secondary containment have been provided in Section III 7 and Appendix Q of this ICP.

Servicing, maintenance and testing of the facility alarm systems will be completed in accordance with NFPA 72 Chapter 7 - Testing, Inspection, and Maintenance of National Fire Alarm Code.

3.3.f Finance/procurement/administration

The chief of the finance function is the ***Finance Section Chief***. The EC may assign to the Finance Chief responsibility for implementing and managing finance section activities to proactively accomplish the response. Specific responsibilities include:

- Providing, managing, coordinating, documenting and accounting for access to funding for the response, including possibly acting as the liaison between the insurance company and GECS.

- Coordinating and ensuring proper completion of response cost accounting documentation.

- Providing financial support for contracting services, purchases and payments.

- Identifying and obtaining additional financial services, resources or logistics support needed.

The finance section is responsible for the following job functions, which the Finance Chief may delegate to a finance staff as follows:

Emergency Contract Administrator Negotiates, coordinates, manages and documents all contracts, procurement orders, payments, and other logistics support needed for response operations.

Emergency Claims Administrator Receives and processes claims; coordinates evaluations of personal property damage claims; identifies additional resources and logistics support.

Emergency Cost Administrator Manages, coordinates and performs cost documentation for the response based on personnel equipment and other resource hours attributed to the response.

3.3.f.1. Resource List

See Appendix H of this ICP for a list of available materials, quantities and locations for emergency response.

3.3.f.2. Personnel Management

A list of response personnel capabilities, response time, and qualifications have been provided in the beginning pages of Section II of this ICP. Responsibilities for response personnel are described in Section III Annex 3.b, Emergency Response Organization Roles and Responsibilities.

3.3.f.3. Response Equipment Testing and Deployment

Appendix H of this ICP includes lists of available materials, quantities and locations for emergency response. Newington Energy will respond to on-site releases with available response equipment, if practical. If necessary, additional response equipment as listed in Appendix H will be provided by either Clean Harbors or United Oil.

On-site response equipment, including speedi-dry, spill pads, absorbent booms, etc., will be inspected as described in Appendix H and Q. The on-site equipment is primarily for one time use. As such, it will not be specifically tested or deployed. Response equipment to be provided by either Clean Harbors or United Oil (e.g. skimmers, sea booms, boats) are maintained and tested by those contractors. Contractor response equipment is routinely deployed during normal business activities. As such, a formalized deployment schedule is not available from the referenced response contractors.

3.3.f.4. Support equipment

Support equipment will be provided by the OSRO contractors. A list of support equipment that will be available is provided in Appendix H.

3.3.f.5. Contracting

All contracting activities will be coordinated by the Finance Chief. Companies that have been contracted to function as the oil spill response organization (OSRO) are identified in the beginning pages of Section II of this ICP. Copies of those contracts have been included in Appendix J. Waste Disposal activities will be contracted as needed.

3.3.f.6. Claims procedures

This ICP has been developed to meet the emergency response requirements for the regulatory programs described in Section I 1 of this ICP. There are no requirements for this ICP to include information on Claims Procedures based on the regulatory programs that are applicable to Newington Energy.

3.3.f.7. Cost documentation

This ICP has been developed to meet the emergency response requirements for the regulatory programs described in Section I 1 of this ICP. There are no requirements for this ICP to include information on Cost Documentation based on the regulatory programs that are applicable to Newington Energy.

3.4 Annex 4. Incident Documentation

3.4.a Post accident investigation

GECS Incident Investigation Procedure

All EHS incidents must be investigated. In addition, incidents must be investigated where a "near miss" occurred that could have resulted in a catastrophic release involving anhydrous ammonia. The magnitude of the investigation will vary according to the severity or potential severity of the incident.

The Facility Manager or designee will designate who is responsible for conducting the incident investigation. It is recommended that more than one person be involved in the investigation, including management and/or EHS personnel when practical. In instances where contractors are involved with processes or operations that result in incidents or "near misses", those individuals should be included on the incident investigation team.

The investigation should be conducted as soon as practical after the incident following the activities required to control the hazard. In all cases the investigation must be initiated **within 24 hours** of the incident.

When indicated by the severity of the incident, steps to secure the incident site must be initiated immediately to ensure the investigating party can reconstruct the events leading to the incident. The following general guidelines should be followed while completing an incident investigation:

- Individual interviews should be conducted with each person present at the time of the incident.
- The witnesses should be interviewed promptly, separately and privately.
- The interviewer should explain the purpose of the investigation to each individual.
- The interviewer should ask the witness to give their account of the events that occurred.
- The interviewer should avoid questions that give a yes or no answer.
- After the interview, the interviewer should document any concerns identified.

- The investigation should be directed at determining the root cause.
- The investigation team must focus on getting accurate and complete information.
- The team must separate facts from opinions, and direct evidence from circumstantial evidence.
- The investigation will identify corrective actions, both immediate recovery actions and long term follow-up actions to prevent the incident from reoccurring. Corrective actions shall be entered into the EHS Measurements Reporting Tool, the Audit Tracking System and JSAs should be updated as applicable, based on findings.
- Each concern identified in the investigation must be addressed.
- A formal root cause analysis tool such as the 5-Why Stairway, Fishbone Diagram or Taproot must be used.

Upon completion of the investigation, the on-line EHS Incident Report will be updated by the Facility Manager or designee to reflect investigation findings and corrective actions. Corrective actions should be closed out in a timely manner. In addition, the findings of the investigation will be reviewed with all affected personnel whose job tasks are affected by the findings.

In all cases, the EHS Incident Report (including the investigation findings) must be completed on-line **within 5 days from the incident date**.

More specific incident investigation details related to PSM procedures, training, contract employees, etc. are included in the RMP/PSM Manual.

Post Incident Follow-up and Reporting

Immediate and 2-hour notifications are to be made verbally. Follow-up notifications must be made in writing within a specified period of time. Some agencies require specialized forms for written notifications. These written requirements are described in the following sections and summarized on the Reporting and Notification Requirements Table included in Appendix B of this ICP. ERP-00 - Incident Discovery provides two forms to assist with regulatory notifications of an emergency. Copies of the

forms are located in the EHS offices, and are readily accessible to the First Responders, EHS Primary Responders, and Emergency Coordinator.

- The GECS Emergency Response Incident Report Form ERP-00-1 in ERP-00 - Incident Discovery summarizes information regarding the nature and extent of the emergency. This form should be filled out by the EHS Primary Responder and Plant Protection Desk Officer and kept as a record of the emergency, but also can be used to compile information for regulatory agency and internal GECS notifications;

- The EPA Spill Response Notification Form ERP-00-2 in ERP-00 - Incident Discovery should be completed and used by the Emergency Coordinator and/or his/her designee when notifying the National Response Center (NRC) of a petroleum spill pursuant to the OPA-90 regulations; and,

External verbal and written notifications are completed as specified in the Reporting and Notification Requirements Table included in Appendix B of this ICP. Additional information about the deadlines and information needed to meet Federal and State reporting requirements is provided below.

(a) Federal Follow-up Reporting Requirements – Releases of Oils

Federal regulations (40 CFR 112.4) require that a facility owner/operator submit to the EPA Regional Administrator, **within 60 days** from the date of a spill/release of 1,000 gallons of oil in a single event or of harmful quantities of oil in two spill events within a 12-month period to a surface water body, the following information:

- Name of the facility;
- Names(s) of the owner or operator of the facility;
- Location of the facility;
- Date and year of initial facility operation;
- Maximum storage or handling capacity of the facility and normal daily throughput;
- Description of the facility, including maps, flow diagrams, and topographical maps;
- A complete copy of the SPCC plan with any amendments;

- The cause(s) of such spill, including a failure analysis of system or subsystem in which the failure occurred;
- The corrective actions and/or countermeasures taken, including an adequate description of equipment repairs and/or replacements;
- Additional preventive measures taken or contemplated to minimize the possibility of recurrence; and
- Such other information as the Regional Administrator may reasonably require pertinent to the Plan or spill event.

A complete copy of all information provided to the Regional Administrator shall be sent at the same time to the NHDES. Upon receipt of such information, the NHDES may conduct a review and make recommendations to the EPA Regional Administrator as to further procedures, methods, equipment and other requirements for equipment necessary to prevent and to contain discharges of oil from such facility.

(b) Federal Follow-up Reporting Requirements – Releases of Hazardous Substances

Federal follow-up reporting requirements for reportable releases of hazardous substances are specified in 40 CFR 300.125 (Notification and Communication), 40 CFR 300.215(f) (Hazardous Substance Releases), 40 CFR 300.300 (Oil Removal), 40 CFR 300.405 (Hazardous Substances Removal), 40 CFR 302.6 (Notification for Hazardous Substance), 40 CFR 355.40(b) (Notification for Extremely Hazardous Substance) and 33 CFR 153 (Notice of Discharge of Oil or Hazardous Substance).

After a release of an extremely hazardous substance or a hazardous substance, GECS shall provide an oral notice to the Local Emergency Planning Committee (LEPC) with as much of the following information as is available:

- The chemical name or identify of any substance involved in the release.
- An indication of whether the substance is an extremely hazardous substance. (Note: Federal extremely hazardous substances are specified in 40 CFR 355).

- An estimate of the quantity of any such substance that was released into the environment.
- The time and duration of the release.
- The medium or media into which the release occurred.
- Any known or anticipated acute or chronic health risks associated with the emergency and, where appropriate, advice regarding medical attention necessary for exposed individuals.
- Proper precautions to take as a result of the release, including evacuation (unless such information is readily available to the community emergency coordinator pursuant to the emergency plan).
- The name and telephone numbers of the person or persons to be contacted for further information.

(c) State Hazardous Waste (New Hampshire) Discharge Clean-up and Follow-up (Env-Wm 513.02)

- The generator shall immediately contain and clean up, within 24 hours, any hazardous waste discharge or any discharge of a material which, when discharged, becomes a hazardous waste.
- If the hazardous waste discharge cannot be or is not cleaned up within 24 hours, the generator shall submit a clean up plan to the department within 5 days of the discharge.
- The clean up plan shall:
  - Provide for the protection of human health and the environment;
  - Provide for the removal and proper disposal of the contamination source;
  - Provide for confirmatory analysis of the potentially affected media, for example, soil, groundwater, or surface water, to demonstrate the clean up is successful; and
  - Include a time table for completion of the clean up plan.
- The department shall review the clean up plan and approve it upon determining that the plan meets the criteria described above.

- The generator shall implement the clean up plan as approved by the department.

- Within 30 days of completion of the clean up, the generator shall submit a report to the department detailing the actions taken.

- If the complete clean up can not be accomplished as described above, the generator shall submit a scope of work proposal for site investigations pursuant to Env-Wm 1403 to evaluate the potential impacts of the release on soil and groundwater.

(d) Local Follow-up Reporting Requirements

Following the verbal notification of an accidental release to the sanitary sewer, a written report is to be submitted to the local municipal treatment facility within 5 days of the accidental discharge. Results of resampling conducted immediately after the knowledge of a permit violation must be submitted to the local municipal treatment facility within 30 days of the violation.

3.4.b Incident history

There have been no recorded spill incidents at the facility property based on information provided by plant personnel. Newington Energy, LLC uses a computer based reporting system, GECS Emergency Response Incident Report. Future spill incidents will be recorded in that computer based system. Information in the system will include at least a five year accident history for past incidents. A print out of each spill incident report is maintained in Appendix K.

3.5 Annex 5. Training and Exercises/Drills

This section documents the training and exercise/drill requirements of the various regulatory programs that are incorporated in this ICP, and GECS's program to meet these requirements. The section includes the following section to describe Training and Exercises/Drills:

- Regulatory Training Program Requirements;
- GE specific Personnel Training;
- Training and Drills; and
- Training and Drill Records and Evaluation.

To the extent possible, a single training session that addresses multiple regulatory requirements will be used by the NEL facility to satisfy training requirements. The following sections identify the regulatory program requirements applicable to the NEL facility, GECS's training program, drills conducted at the NEL facility, and the documentation procedures for training and drills.

3.5.a Regulatory Training Program Requirements

The following descriptions identify the specific training and drill needs of the regulatory programs that have been consolidated into this ICP.

OPA-90 (Federal, EPA)

The owner or operator of any facility required to prepare an OPA-90 Facility Response Plan (FRP) also is required to develop and implement a facility response training program and a drill/exercise program that satisfies the requirements of the OPA-90 regulations. The owner or operator also shall describe the program in the FRP. The owner or operator shall be responsible for the proper instruction of facility personnel in the procedures to respond to discharges of oil, and in applicable oil spill response laws, rules, and regulations. A facility response training program shall train those personnel involved in oil spill response activities, in the methods and procedures identified in the FRP. The

OPA-90 training shall be functional in nature, according to job tasks for both supervisory and non-supervisory operational personnel.

The facility owner or operator also is required to develop a program of facility response drills/exercises that include evaluation procedures. The final EPA regulations identify that a facility training/drill program that follows the National Preparedness for Response Exercise Program (PREP) will be deemed satisfactory for meeting OPA-90 training and drill requirements. The PREP Guidelines contain specific requirements for both training and drill exercises to be conducted by land-based facilities subject to OPA-90 requirements. The exercises that are necessary for land based OPA-90 non-transportation related facilities, such as the NEL facility, are as follows:

Quarterly QI Notification Drills

Scope: Exercise communications between facility personnel and Qualified Individuals.

Objective: Contact must be made with a Qualified Individual or designee, as designated in the plan.

Annual Spill Management Team Tabletop Exercises

Scope: Exercise the spill management team's organization, communication and decision making in managing a spill response.

Objective: Exercise the Spill Management Team in a review of:

- Knowledge of the response plan
- Proper notifications
- Communications system
- Ability to access OSRO

- Coordination of organization/agency personnel with responsibility for spill response

- Ability to effectively coordinate spill response activity with National Response System infrastructure

- Ability to access information in the Area Contingency Plan for location of sensitive areas, resources available within the Areas, unique conditions of Area, etc.

At least one Spill Management Team Tabletop Exercise in a triennial cycle shall involve simulation of a worst case discharge scenario.

Annual Unannounced Exercises

Any of the exercises (annually), with the exception of the QI Notification Drill, if conducted unannounced, will satisfy this requirement. One of the Unannounced Exercises must also be an Equipment Deployment Exercise.

Annual Equipment Deployment Exercises

Scope: Deploy and operate response equipment identified in the response plan. Only a representative sample of each type of equipment need be deployed and operated. Note: GECS will require documentation from their spill contractor(s) to satisfy this requirement. The spill contractor also shall provide inspection and maintenance information to GECS.

Objective: Ensure response equipment is operational.

Ensure that the personnel who would operate this equipment in a spill response are capable of deploying and operating it.

SPCC (Federal, EPA)

A facility with a SPCC plan must conduct regular instruction and training of personnel in the operation and maintenance of equipment to prevent the discharge of oil. This plan shall consist of regular training for personnel

conducting work activities involving the storage and use of oil and oil products. Information regarding this ICP Plan, as well as instruction regarding applicable pollution control laws and regulations, is included in skills training associated with job activities involving the use and/or storage of oil products. Annual spill prevention briefings must be held to ensure adequate understanding of the SPCC plan for a facility. The briefings will include at least discussions related to tank or equipment failures, if applicable, and additional precautionary measures if developed independent of the ICP.

Emergency Action Plan (Federal, OSHA)

Training for emergency response employees shall be completed before they are called upon to perform in emergencies. Such training shall include the elements of the emergency response plan, standard operating procedures the employer has established for the job, the personal protective equipment to be worn and procedures for handling emergency incidents.

The employer shall document that each covered employee has attended and successfully completed the training required, or shall document the employee's competency at least yearly. The method used to demonstrate competency for certification of training shall be recorded and maintained by the employer.

Process Safety Management (PSM) (OSHA)/Risk Management Program (RMP) (EPA)

The following general PSM/RMP training will be provided to employees required to operate/work on the anhydrous ammonia system as well as emergency responders:

- HazCom Chemical Specific (Detailed review of the MSDS);
  - PPE
  - Air Monitoring
  - First Aid
  - Physical Properties

  - Emergency Response
- GE Ammonia (NH3) specific training;
- Ammonia (NH3) was addressed during the 24 hour HazMat training;
- Ammonia (NH3) Operating Procedure; and
- Ammonia (NH3) Offloading procedure and Chemical Handling Procedure.

More detailed information related to training is included in the RMP/PSM Manual. Training related to Management of Change will also be included in the RMP/PSM Manual.

3.5.b Personnel Training

The NEL facility maintains a comprehensive training program and all employees are expected to take part in training programs at least annually. New employees receive training as soon as practical, however no later than prior to handling or exposure to hazardous materials. Each employee is trained using a combination of classroom activities, as well as on-the-job activities. Training topics and materials are in accordance with NEL internal guidelines. Employee training records are maintained in the facility's Training Tracker electronic training database.

Following the initial training, additional training is conducted to ensure personnel are proficient in their responsibilities. In addition, safety and discharge prevention meetings are held, as well as safety inspections. Handbooks on safety, policies, procedures, and other specific operations are made available to all employees.

The Employee Training Outline included as Appendix L provides a matrix of the specific training conducted by GECS at the NEL facility to ensure compliance with regulatory training requirements. As shown on the matrix, various levels of response training are received by personnel at the plant, depending on their assigned responsibilities.

Awareness Level Training

Any employee who is likely to discover a hazardous substance release shall be trained in how to report the release to proper authorities in the plant. They shall have sufficient training to demonstrate competency in the following areas:

- An understanding of what hazardous substances are, and the risks associated with them in an incident.
- An understanding of the potential outcomes associated with an emergency created when hazardous substances are present.
- The ability to recognize the presence of hazardous substances in an emergency.

- The ability to identify the hazardous substances, if possible.
- An understanding of their role of the first responder awareness individual in the employer's emergency response plan.
- The ability to realize the need for additional resources, and to make appropriate notifications to the communication center.

Operations Level Training

Operations level employees respond defensively to a chemical spill or release. They are trained to contain a release from a safe distance and keep it from spreading, without trying to stop it. These individuals have received at least 8 hours of training or have had sufficient experience to demonstrate competency in the following areas in addition to those listed for the awareness level.

- Knowledge of the basic hazard and risk assessment techniques.
- Knowledge of how to select and use proper personal protective equipment provided at their level.
- An understanding of basic hazardous material terms.
- Knowledge of how to perform basic control, containment and/or confinement operations within the capabilities of the resources and personal protective equipment available with their unit.
- Knowledge of how to implement basic decontamination procedures.
- An understanding of the relevant standard operation procedures and termination procedures.

Emergency Response Training (OSHA 24-hour)

Selected personnel are trained to a higher degree, based on their responsibilities within the Emergency Response Organization. Personnel trained as Hazardous Materials Technicians have received at least 24 hours of training equal to the first responder operations level. Areas of competency include:

- Knowledge of how to implement the NEL facility's emergency response plan.
- Knowledge of the classification, identification and verification of known and unknown materials by using field survey instruments and equipment.
- Knowledge of how to function within an assigned role in the Incident Command System.
- Knowledge of how to select and use proper specialized chemical personal protection equipment provided and an understanding of hazard and risk assessment techniques.
- Ability to perform advanced control, containment, and/or confinement operations within the capabilities of the resources and personal protective equipment available.
- An understanding of decontamination procedures.
- An understanding of termination procedures
- An understanding of basic chemical and toxicological terminology and behavior.
- In addition, personnel trained as Incident Commanders receive training in the following areas:
- Knowledge and ability to implement the NEL facility's incident command system.

- Knowledge of how to implement the NEL facility's emergency response plan.

- Knowledge and understanding of the hazards and risks associated with employees working in chemical protective clothing.

- Knowledge of how to implement the local emergency response plan.

- Knowledge of the state emergency response plan and of the Federal Regional Response Team.

- Knowledge and understanding of the importance of decontamination procedures.

At least once a year, emergency responders must either receive HAZWOPER refresher training or show that they are able to perform their duties. The following topics will be addressed during the training:

- Regulatory Overview;
- Safety Plans & Standard Operating Procedures;
- ICS;
- Characteristics Of Hazardous Materials;
- Principles Of Toxicology;
- Identification Of Hazardous Materials;
- Informational Resources;
- Size-Up Strategy;
- Levels Of Protection;
- Chemical Protective Clothing;
- Respiratory Protection;
- Air Monitoring Instruments;
- Decontamination;
- Scene Control, Reconnaissance And Entry;
- Response Organization/Warehouse & Transport; and
- Confinement And Containment.

ICP (SPCC, FRP) Training

As shown on the matrix in the Employee Training Outline, employees also are trained in implementation of this Integrated Contingency Plan to meet OPA-90 (SPCC & FRP). In addition, as an integral part of plant training activities, discharge prevention meetings are held periodically or incorporated as part of other meeting topics, such as pollution prevention. The objective of these meetings is to discuss issues and potential spill scenarios that are present at the NEL facility. Action required to eliminate or minimize the potential for spills, where feasible, are identified and implementation schedules are set. As plant management becomes aware of new spill prevention procedures or the installation of a new potential spill source, this information also is communicated to affected employees through the training program.

Although training is required only for oil-handling personnel at the facility, Newington Energy completes training requirements as described above for all individuals on the Response Team Contact list included in the Yellow Pages.

Oil Spill Response Organization (OSRO) Personnel Training

GECS has an OSRO under contract for Average Most Probable, Maximum Most Probable, and Worst Case Discharges. See the list of OSROs listed in the Yellow Pages at the front of Section II of this ICP. The OSRO is responsible for ensuring and documenting that their personnel meet applicable regulatory training requirements.

Volunteers / Casual Laborers

In the event of an oil spill, volunteers, and casual laborers may be employed to assist in such areas as equipment preparation. The contracted OSRO will provide training for these personnel; the training will be at least a 4-hour emergency spill and personal protection procedures course to provide them with sufficient information to protect them from the product being recovered and site control measures. In addition, they will be under the constant supervision of a fully qualified and experienced person from the contracted response organization.

3.5.c Training and Drill Program

ICP training and drills at the NEL facility will be conducted in accordance with the following schedule:

- QI Notification Drills - Quarterly
- Spill Management Team Tabletop Drill - Annually
- Unannounced Deployment Drills - Annually by Oil Spill Removal Organization (OSRO) – NOTE: These may be conducted at locations other than the NEL Facility
- Personnel Response Training - Annual
- Discharge Prevention Training – Annual

Forms similar to those found in the tables developed in the OPA Training, Drills, Exercises and Logs in Appendix M will be used to document these training and drill events. Training documentation will be maintained by the Emergency Coordinator.

Quarterly QI Notification Drills will consist of proper notifications in accordance with the Notification Phone Numbers listed in the beginning pages of Section II of this ICP. The QI or Alternate identified will be notified of a mock spill event and that the notification is a drill. Phone numbers and individuals identified by name will be verified at this time.

The Annual Spill Management Team Tabletop Drill will consist of notifications in accordance with the Notification List as presented in the Reporting and Notification Requirements Table provided in Appendix B of this ICP, as appropriate for the spill scenario. The tabletop exercise will also involve a complete discussion of a response to an identified spill/release event. This ICP (and particularly Section II) will be used for this exercise.

The facility spill contractor(s) will be responsible for annual deployment of their equipment with a written report and certification of the deployment being sent to GECS. The spill contractor(s) also will be responsible for the maintenance of the respective

equipment inspection logs. Copies of the documentation will be provided to the Emergency Coordinator.

The NEL facility intends to prepare for response activities with federal, state, and local agencies by participating in area exercises including announced/unannounced drills for area industries and resources.

3.5.d Training and Drill Records and Evaluation

Personnel Training Logs

Training at the NEL facility is provided by qualified GECS personnel and/or training consultants. Training records for ICP-related training are maintained in the Environmental Health and Safety Office for 3 years as well as in the Training Tracker database system. Training records for the OSRO are maintained in the OSRO's office for 3 years.

Drill Logs

During the drills, actions taken by response personnel, both predicted and unpredicted, will be noted so that any problems that arise can be resolved as soon as possible. Drill Documentation Forms (Tables 3.5.2-1 to 3.5.2-3) will be completed and maintained by the Emergency Coordinator for a period of 3 years.

3.6 Annex 6. Response Critique and Plan Review and Modification Process

3.6.a Review and Update Procedures

GECS NEL regularly takes action to ensure that the facility response plan and organization are kept current and effective. To ensure that the ICP is maintained per regulatory requirements, the Environmental Health and Safety Department will review the plan on an annual basis using the checklist provided Table 1 in Appendix N in ICP Annual Checklist and Record of Change. In this task, the following items will be considered:

- Telephone numbers and contact lists.
- Changes in facility operations and equipment.
- Changes in facility organization or key personnel.
- Evaluations of drills.
- Federal, State and local regulatory changes.
- Changes in the facility emergency response plan.

Areas requiring revision will be identified and the Environmental Health and Safety Department will prepare revisions to the plan as required. Whenever a section is revised, the updated revision number and effective date of that revision will be indicated in that section of the plan on the bottom of the page. The revision, affected pages, date of revision and a brief summary also will be indicated on the record of changes page (Table 2 in Appendix N) to facilitate audit of the plan status. Updated copies of the plan will be distributed to members of the response organization and to off-site agencies as appropriate. Appendix R identifies the inventory of plan holders for updating, distribution, and administration.

3.6.b Program Review/Update Requirements

Each of the regulatory programs that are addressed by this ICP have review/update requirements, as described below.

OPA-90, 40 CFR 112.20(d)(1)

Per OPA-90, GECS must revise and resubmit the FRP elements of the plan to EPA for approval within 60 days of each facility change that materially may affect the potential for discharge, including:

- A change in the facility's configuration that materially alters the information included in the response plan;
- A change in the type of oil handled, stored or transferred that materially alters the required response resources;
- A change in the oil spill removal organization that provides equipment and personnel to respond to spills;
- A material change in the facility's spill prevention and response equipment or emergency response procedures; and/or
- Any other changes that materially affect the implementation of the response plan.
- There are many potential sources for revisions to the OPA-90 components of this ICP, some of which are identified below:
- Training sessions that will generate ideas on how to improve areas, such as communication.
- Mock drills that may identify problems such as equipment dispatch and deployment difficulties, communications, efficiency, and effectiveness of plan components which require written clarification.

- Information (such as vendor input) obtained regarding state of the art spill response equipment.

- Changes to current regulations that ultimately effect the OPA-90 components of this document.

The ICP will be reviewed annually from the date of approval by the EPA Administrator for compliance with the OPA-90 (Non-Transportation Related) FRP. The response plan elements also will be updated after spill events, as necessary. The entire plan will be reviewed on a 5-year basis to ensure completeness and regulatory compliance of the plan. The plan will be reviewed on a shorter annual basis if the Regional Administrator establishes a different schedule.

Any amendments will be documented on the Record of Changes Summary found in Table 2 in Appendix N and submitted to the agency. Changes made to the plan on the annual review will be sent to the Regional Administrator, while the 5-year updates will be submitted for review and approval by the Regional Administrator.

SPCC

The SPCC components of this ICP must be amended when there is change in facility design, construction, operation, or maintenance that materially affects the facility's potential to discharge oil. Changes requiring amendment include, but are not limited to:

- Commission or decommission of tanks

- Replacement or installation of piping systems

- Construction or demolition that might alter secondary containment structure. Revision of standard operation or maintenance procedures at a facility.

Amendments need to be made as soon as possible, but no later than 6 months after a change occurs.

Notwithstanding compliance with the amendment provisions listed above, this Plan must be reviewed at a minimum, every five (5) years. Newington Energy must amend the Plan within six (6) months of the review to include more effective prevention and control technology if (1) such technology will significantly reduce the likelihood of a discharge, and (2) if such technology has been field-proven at the time of the review. Implementation of such amendments is required within six (6) months following the amendment. Documentation must be maintained by the facility showing completion of the review and evaluation and a statement must be signed indicating whether the Plan will be amended. The statement shall read as follows: " I have completed a review and evaluation of the plan for Newington Energy's, Newington, New Hampshire Facility on (date) and the Plan will (will not) be amended as a result". Plan amendments, if required, will be certified by a registered Professional Engineer.

Further, whenever a facility subject to 40 CFR 112.3 has discharged either:

- more than 1,000 U.S. gallons of oil in a single spill event, or
- more than 42 gallons in each of two discharges within any 12-month period that may be harmful to public health, welfare or the environment.

The owner or operator of such facility shall submit to the EPA Administrator, within 60 days from the time such facility becomes subject to this section, a report describing the nature, conditions, and impact of such a spill(s). The EPA may require an amendment of the SPCC Plan, based on a review of the spill information provided. GECS NEL may comment upon (within 30 days of notice) and/or may appeal the required amendment, following procedures identified in 40 CFR 112.4.

OSHA PSM

The "procedures and practices" portion of PSM as required in 29 CFR 1910.119(o)(1) must be certified for compliance at least every three (3) years. Those documents are maintained and certified in the RMP/PSM Manual.

The PSM portion of the ICP will be reviewed and modified in the event that there is a change to process chemicals, technology, equipment, and procedures.

OSHA HAZWOPER

There are no specific review/update requirements for this program; however, the plan must remain accurate at all times.

EPA - RMP

The "operating procedures" portion of the RMP as required in 40 CFR 68.69 must be certified for compliance annually. Those documents are maintained and certified in the RMP/PSM Manual.

The RMP portion of the ICP will be reviewed and modified in the event that there is a change to process chemicals, technology, equipment, and procedures.

3.6.c Revision Pursuant To Training Or Emergency Response

Revisions to this ICP that are deemed appropriate following either a training session, or an actual response will be made as necessary. These revisions will be submitted to relevant agencies according to the submission procedures described below.

3.6.d Revision Submission Procedures

GECS NEL will submit one copy of the revised elements of this ICP to the relevant regulatory agency for review. Regulatory agencies that will receive a copy of the ICP are identified in Appendix R. The entire OPA-90 component will have to be resubmitted at the next 5 year renewal interval required in the federal regulations, or when a significant change occurs at the facility that requires a partial submission of

revised information. Copies of the most recent ICP submitted to regulatory agencies will be maintained by the EHS Office. Revisions to this plan that are submitted to regulatory agencies will be documented using Table 2 in Appendix N.

3.6.e Plan Distribution

A copy of the Integrated Contingency Plan is kept on file 24 hour a day at the following locations:

- In the NEL Library, EHS Manager Office, Control Room and Facility Managers office.

A distribution list is included in Table 3 in Appendix R.

3.7 Annex 7 - Prevention

Prevention

Spill prevention is an important element of a comprehensive spill contingency plan. Spill prevention begins with effective engineering design. Consequently, oil and hazardous material containment structures at the NEL facility have been designed and constructed to minimize mechanical failure that could result in spill/release incidents. In addition, many of the oil storage units at this facility are equipped with measurement/gauging instruments or other provisions that also assist in oil spill prevention. Details about NEL' compliance with the SPCC program, including discharge detection and spill prevention procedures, are provided in this section of the ICP.

Discharge Detection Systems

Two means by which spills are detected at the NEL facility are discovery by personnel and automated discharge detection.

Discharge Detection By Personnel

Upon detection of a spill, employees are instructed to notify the power plant operator (PPO) immediately. The procedures for reporting the spill are presented in (see ERP-05). The reporting individual also should try to notify other personnel working in the affected area.

Section II of this ICP contains the Incident Discovery (ERP-00) procedure that must be followed by anyone detecting a spill/release event of any type/size at this facility.

Automated Discharge Detection

High- and low-liquid level alarms with audible and visible signals are provided for some of the tanks as described in Section III 1.c, and are connected to a constantly manned operating station. Liquid-level sensing devices are tested annually and routinely inspected to ensure proper operation and a high reliability

of the automated systems. Section III 3.1.c identifies automatic leak detection measuring devices for each storage unit.

Protection For Spills Resulting From Mechanical Failure

The design and construction of containment structures provides the initial basis for minimizing releases beyond containment. Numerous procedures are also in place at the facility to identify measures to be taken to prevent a spill from occurring. The measures and procedures that are in place to reduce the potential for a spill resulting from mechanical error are identified below.

Newington Energy's aboveground storage tanks are subject to regular visual inspections as described above. Newington Energy will combine its visual inspections with another tank testing technique as determined to be necessary based on the results of the visual inspection program or approximately every five (5) years. Tank testing will utilize one of the following methods: hydrostatic testing, radiographic testing, ultrasonic testing, or other non-destructive shell testing. Any deficiencies noted will be corrected as soon as possible. Documented inspections and corrective actions will be maintained on file.

As appropriate for the applicable use, carbon steel tank shells and bottoms are constructed according to American Petroleum Institute (API) specifications in effect at the time of construction. The tank bottom for Tank 21 is cathodically protected. The tank material and construction are compatible with stored products at storage temperatures and pressures. If Tank 21 undergoes a repair, alteration, reconstruction, or a change in service that might affect the risk of a discharge or failure due to brittle fracture or other catastrophe, or has discharged oil or failed due to brittle fracture failure or other catastrophe, Newington Energy will evaluate the container for risk of discharge or failure due to brittle fracture or other catastrophe, and as necessary, take appropriate action.

Where practical and appropriate, dikes, acting as a secondary means of containment, have been designed and constructed to contain the entire useable storage volumes of the largest single tank, plus sufficient freeboard to allow for anticipated

precipitation. Diked areas are sufficiently impervious to contain spilled oil until it can be removed or treated.

To ensure adequate containment and to help maintain the structural stability of the containment walls, rain water levels inside diked areas are kept to a minimum by supervised drainage, if necessary. Field observation and/or analytical testing is conducted on the rain water collected to determine whether the water quality meets regulatory discharge limits before it is released through a manually operated valve (LSD Tank). This valve either directs oily water (noticeable sheen, odor or other characteristic sign of contamination) to the on-site oily water separator or directs clean water without characteristics of contamination to the on-site storm water control basin. No automatic liquid level on/off controls are used, and the manually operated valve is kept in a closed and locked position when not being used.

Tanks, piping and dikes are observed by facility personnel during normal plant duties. Any sign of deterioration or leakage which might cause a spill or accumulation of oil inside diked areas is reported to the Maintenance organization and plant operations.

Level gauges are located in the foam house at the fuel oil tank and in the control room. The level gauges are recorded daily and the tanks are inspected daily. A tape level check of the tanks is performed monthly (see in Maintenance, Inspection, and Testing in Appendix Q for further detail on inspection practices).

Inspections are conducted to identify visible oil leaks from tank seams, gaskets, rivets and bolts that can cause significant accumulation of oil in diked areas. Any such leak would be reported immediately to the maintenance organization and repaired (see Appendix Q for further detail on inspection practices).

Piping systems at the facility are designed and operated in such a manner that the chance of release of oil is minimized. To reduce corrosion, above ground piping is painted or insulated. If the piping fails, corrective action is taken pursuant to this ICP. Above ground piping is visually inspected for external corrosion at least annually (see Appendix Q for further detail on inspection practices).

Piping which is not in service is capped, valved or otherwise restrained to prevent spills, and marked as to its origin. Pipe supports are designed according to good engineering practice.

Tank failure can occur from damage, deterioration, age, or from a natural disaster. Ongoing spill prevention and detection measures at NEL are further described above, hazard assessment information is provided in Section III 3.d.1, and procedures for the inspection of tanks are presented in Appendix Q.

Protection For Spills Resulting From Human Error

The potential for a spill related to human error exists during fuel transfer and tank filling operations. Measures taken to prevent a release from occurring during fuel transfers or tank filling operations are described below.

All truck shipment and other large vehicles enter the facility by a controlled entrance designated for truck traffic. This entrance is posted with signs that warn drivers of the presence of overhead lines and states the minimum clearance where this type of traffic has access at the facility. The sign format is similar to that used on all major roadways by the Department of Transportation. As a precaution, all overhead lines which may have traffic pass under are set at an elevation that is higher than the normal over-the-road vehicle height (13 feet, 6 inches).

Supplier Deliveries

Petroleum products are delivered to above ground tanks at various locations throughout the plant and by using the Sprague Energy pipeline or by tank trucks and flatbed trucks carrying drums or other small containers. Bulk deliveries are made to above ground storage tanks as described in Section III 1.c.

In accordance with the requirements established by the Department of Transportation (DOT), tank truck unloading procedures at the facility include the following:

- Unloading operation is attended at all times by plant personnel and/or the delivery truck operator.

- During the unloading operation, plant personnel and/or the delivery truck operator maintain an unobstructed view, within 25 feet, of the transfer operation.

- Plant personnel and/or the delivery truck operator remain awake during the transfer operation.

- Plant personnel and/or the delivery truck operator are aware of the hazards associated with the material being transferred.

- Plant personnel and/or the delivery truck operator have the means and authority to move the tank truck, if necessary.

Two methods are used at the facility to prevent spills related to the departure of tanker trucks before complete disconnect of flexible or fixed transfer lines. Tanker trucks which deliver No. 2 fuel oil, to the facility are equipped with systems that disables the unloading pump unless the tanker truck is properly grounded. In addition, signs are posted at locations where oils are delivered to warn drivers to confirm that all transfer lines and hoses are disconnected and to check that all valves and outlets on the truck are closed and not leaking.

Tanks have a designated delivery area that includes secondary containment. For all other tank trucks or flatbed trucks or box trailers carrying numerous small containers, the following structural controls are used to prevent a discharge:

The delivery truck is secured by parking in gear, using the emergency brake, or placing blocks behind wheels.

Plant personnel verify that the condition of the receiving container(s) is adequate (no dents, rust, leakage) and that the capacity of the container is adequate for the quantity being delivered.

Drip pans are placed under the hose connection at the truck.

Where practical, transfers of containers are made indoors.

Spill kits are generally available in or near off-loading areas.

Off-Site Shipment

Contractors removing waste oil for shipment at the NEL facility are required to follow their normal company policy, DOT requirements, and GECS policy regarding shipping procedures. Contractors provide any drip pans needed and have available spill kits for possible spill events. Contractors are advised of GECS standard operating procedures including spill prevention and response notification as part of the required contractor training.

Where GECS facility personnel perform oil removal, the procedures described in the previous section as well as those described below are followed.

- Funnels are used to fill drums of waste oil.
- Only containers in good condition (no dents, rust, etc.) are used to store and transport waste oil.
- Full containers are promptly sealed and labeled.

Plant personnel verify that the truck picking up the oil has the necessary capacity to accommodate the load.

Transfers Within the Facility

By Vehicle

Oil that is held in tanks, sumps, or machines is removed from those vessels for transfer to other locations at the facility for other types of handling. The transfers are performed by GECS material handling personnel and equipment, by contractors, and by various mobile fleet operations. These activities can take place in numerous locations throughout the facility. The procedural controls described in the previous sections are followed during fuel transfers.

By Overhead Pipelines Outdoors

Except for the bulk transfer pipeline from Sprague, fuel oil is transferred throughout the facility in single walled pipelines carried on pipe bridges. Structural controls, such as double walled pipe with interstitial monitoring, are not used for other fuel lines. GECS believes other means to detect and address a discharge are acceptable, such as reliance on its existing strong spill contingency plan and 24-hour attention by operations employees. In addition, the following structural controls have been installed to help prevent discharges:

- Traffic control guardrails have been placed around pipe bridge columns to protect them from damage by a vehicle.
- Integrity testing of all similar age pipe runs will be conducted immediately following the discovery of a leak.

By Overhead Pipelines Indoors

Oil is transferred inside buildings in overhead pipelines. The following structural controls have been installed:

- Floor drains that terminate in an enclosed sump.

Additional Spill Prevention Measures

In addition to the spill protection measures described above, certain passive oil and hazardous material spill prevention measures and mechanisms (e.g., secondary containment) have been or will be implemented for the identified oil and hazardous material storage units at the NEL facility. Spill prevention measures that are, or will be, used at this facility include:

- Secondary Containment
- Diversionary Structures and Drainage Planning
- Material Compatibility
- Corrosion Protection
- Maintenance Activities
- Housekeeping Program
- Security

These spill prevention measures are described below.

Secondary Containment

Appendix D provides a description of the type and characteristics of the secondary containment for each of the oil and hazardous material storage units (tanks or other type of storage area) at this facility. Information on secondary containment volumes and structures have been provided to Triton by Newington Energy, LLC. Where applicable, the document also identifies the type of drain valve for each secondary containment area. Containment areas for oil storage units are constructed so that drainage is restrained by locked valves in order to prevent any unauthorized release from the containment area. As part of this facility's tank inspection program, the integrity of the berm and floor at each location is routinely verified as described in Appendix Q so that repairs or upgrades can be scheduled and completed.

Material Compatibility

During the design and engineering of any oil, hazardous material, or waste storage unit, including tanks, pipes, valves and other equipment, standard material engineering practices are applied to ensure compatibility of the stored material and the equipment material. The following factors will continue to be considered with regard to material compatibility at the NEL facility:

- the materials of construction and their susceptibility to corrosion;
- the compatibility of construction materials of tanks, pipelines, valves and other equipment with their contents;
- the reaction of materials or wastes when intentionally or inadvertently mixed or combined;
- the compatibility of materials and their environment;
- the procedures and practices while mixing materials;
- prohibition of the mixing of incompatible materials which may result in fire, explosion, or unusual corrosion; and
- clear marking on the inventory of any chemical materials that require special handling, storage, use, and disposal considerations.

Corrosion Protection

Aboveground storage tanks at the NEL facility are protected from corrosion by paint , insulation or cathodic protection (Tank 21, Bulk No. 2 fuel oil). The visual inspections performed by facility personnel identify areas exhibiting signs of corrosion, which are repaired and repainted as necessary. Drums are not stored for extended periods of time. Drums exhibiting unacceptable corrosion are emptied, replaced and disposed of when necessary. Oil storage and transfer units are protected from corrosion by paint, insulation or other coatings. These coatings are repaired when necessary.

Maintenance Activities

The NEL facility will require regular inspections of storage tanks and areas. In addition to this, facility personnel also inspect storage tanks as a part of their regular activities. Inspection forms are used to document specified tank and storage area inspections. Appendix Q of this document describes the consolidated tank and storage area inspection program.

Housekeeping Program

Nearly all housekeeping at the NEL facility occurs indoors, in the immediate vicinity of facility operations. Currently, storage vessels, dumpsters, and drums are located where they are accessible for the use intended. Storage areas are maintained to prevent excess accumulation of materials, especially obsolete materials. Routine housekeeping and regular cleanup/disposal schedules are in place.

Security

The existing facility security system will be maintained in accordance with GECS procedures. Security is maintained at the facility by operations personnel who make regular rounds and inspections. The perimeter of the NEL Facility is surrounded by a security fence, and security cameras to provide coverage for strategic areas of the facility 24 hours a day.

In addition, response procedures have been developed to deal with suspected acts of sabotage or terrorism. These security procedures are provided in ERP-010.

3.8 Annex 8 - Regulatory Compliance and Cross-Reference Matrices

The cross-reference tables provided in the following pages have been provided to identify the location in the ICP for the requirements specified in the regulations. The tables generally follow the format provided by the NRT in the One Plan guidance document.

Newington Energy, LLC
Integrated Contingency Plan (ICP) Regulatory Compliance and Cross-Reference Matrices

(1) EPA's Oil Pollution Prevention - Spill Pollution, Control, and Countermeasures Plan (40 CFR 112)

ENVIRONMENTAL PROTECTION AGENCY Spill Prevention Control and Countermeasure Plan Elements		Found in Plan at:	
Section	**Title**	**Section**	**Page**
	Requirement to prepare and implement a Spill Prevention, Control, and Countermeasure Plan 112.3		
(d)	Professional Engineer Review and Certification		
(1)	Certification Statement	App. O	App. O
(e)	Maintenance of the Plan		
(1)	Maintain a copy of the Plan at the facility	III.6.e	III-90
(2)	Plan available for review to Regional Administrator during normal working hours	III.6.e	III-90
	General Requirements 112.7		
	Management Approval	App. O	App. O
	Plan Prepared in Writing	1.1	I-1
	Cross-Reference of Requirements	III.8	III-101
	Additional facilities or procedures, methods, or equipment not yet fully operational	NA	NA
(a)			
(1)	Conformance with Requirements in this part	I.1	I-1
(2)	Comply with applicable requirements in this part	I.1	I-1
(3)	Description of physical layout of the facility including facility diagram		
(i)	The type of oil in each container and its storage capacity;	Figure 4, App. D	Figure 4, App. D
(ii)	Discharge prevention measures including procedures for routine handling of products (loading, unloading, and facility transfers, etc.);	III.1.c.2, III.1.c.5, III.1.c.9	III-5, III-7, III-18
(iii)	Discharge or drainage controls such as secondary containment around containers and other structures, equipment, and procedures for the control of a discharge;	III.1.c.8	III-14
(iv)	Countermeasures for discharge discovery, response, and cleanup (both the facility's capability and those that might be required of a contractor);	App. A	ERP-05
(v)	Methods of disposal of recovered materials in accordance with applicable legal requirements; and	III.3.d.4	III-55
(vi)	Contact list and phone numbers for the facility response coordinator, National Response Center, cleanup contractors with whom you have an agreement for response, and all appropriate Federal, State, and local agencies who must be contacted in case of a discharge as described in §112.1(b).	II, App. B	II-ii, II-iii, App. B
(4)	Consideration for having submitted a Response Plan per 40 CFR 112.20	I.1	I-1
(5)	Consideration for having submitted a Response Plan per 40 CFR 112.20	I.1	I-1
(b)	Direction Prediction, Flow Rate, Total Possible Quantity Discharged	III.1.c.5, App. D	III-7, App. D
(c)	Appropriate Containment/Diversionary Structures/Equipment to Prevent Discharge from Reaching Navigable Waters	III.1.c.5, App. D	III-7, App.D
(1)	Onshore Facilities		

ENVIRONMENTAL PROTECTION AGENCY Spill Prevention Control and Countermeasure Plan Elements		Found in Plan at:	
Section	**Title**	**Section**	**Page**
(i)	Dikes, berms, or retaining walls sufficiently impervious to contain oil;	III.1.c.5, App. D	III-7, App.D
(ii)	Curbing;	NA	NA
(iii)	Culverting, gutters, or other drainage systems;	NA	NA
(iv)	Weirs, booms, or other barriers;	NA	NA
(v)	Spill diversion ponds;	III.1.c.7	III-13
(vi)	Retention ponds; or	NA	NA
(vii)	Sorbent materials.	NA	NA
(d)	Impracticability Demonstrated (unless Response Plan submitted)	NA	NA
(1)	Contingency Plan	NA	NA
(2)	Commitment of Manpower, Equipment, etc.	NA	NA
	Inspections, tests, and records, 112.7 (e)	III.7, App. Q	III-91, App. Q
	Personnel Training and Spill Prevention Procedures, 112.7 (f)	III.5	III-71
(1)	Training on Operation and Maintenance of Equipment to Prevent Discharges of Oil and Applicable Regulations	III.5	III-71
(2)	Designated Person Accountable for Spill Prevention	III.3.a	III-26
(3)	Periodic Spill Prevention Briefings	III.5.a	III-71
	Security, 112.7 (g)		
(1)	Facility fully fenced	III.3.e.2, III.7	III-57, III-91
	Entrance gates locked and/or guarded	III.3.e.2, III.7	III-57, III-91
(2)	Master Flow and Drain Valves Secured in Closed Position when in a Non-Operating or Standby Status	III.3.e.2	III-57
(3)	Starter Controls on Pumps Locked in the Off Position or Located at a Site Accessible Only to Authorized Personnel When in Non-operating or Standby Status	III.3.e.2	III-57
(4)	Transfer Connection(s) of Pipelines Capped or Blank-Flanged when not in Service	III.1.c.9	III-18
(5)	Facility Lighting Adequate to Facilitate Discovery of Spills and to Deter Vandalism	III.3.e.2	III-57
	Facility Tank Car and Tank Truck Loading/Unloading Rack, Onshore, 112.7 (h)	III.7	III-91
(1)	Rack Drainage Flows to Catchment Basin or Treatment System	III.7	III-91
	Rack Drainage Flow into Quick Drainage System and Adequate Secondary Containment	III.7	III-91
(2)	Provide an interlocked warning light or physical barrier system, warning signs, wheel chocks, or vehicle break interlock system in loading/unloading areas to prevent vehicles from departing before complete disconnection of flexible or fixed oil transfer lines.	III.7	III-91
(3)	Vehicle Inspection Prior to Transfer and Departure	III.7	III-91
	Evaluate aboveground container for risk of discharge or failure after repair, alteration, reconstruction, or a change in service that may result in brittle fracture or other catastrophe, and as necessary, take appropriate action, 112.7 (i)	III.7	III-91
	Conformance with the applicable requirements and other effective discharge prevention and containment procedures, 112.7 (j)	NA	NA

ENVIRONMENTAL PROTECTION AGENCY Spill Prevention Control and Countermeasure Plan Elements		Found in Plan at:	
Section	**Title**	**Section**	**Page**
	Facility Drainage, Onshore, 112.8 (b)		
(1)	Drainage from Diked Storage Areas via Manually Operated Valves	III.1.c.8	III-14
(2)	Storm Water Inspected Prior to Discharge Into Open Water From Diked Storage Areas	III.1.c.8	III-14
(3)	Drainage From Undiked Areas Flows Away from Flood Areas	III.1.c.7, Figure 5	III-13, Figure 5
(4)	If Plant Drainage Not Engineered, Final Discharge of In-Plant Ditches Equipped with Diversion System to Return Spills to Facility	III.1.c.7, Figure 5	III-13, Figure 5
(5)	Natural Hydraulic Flow Used Where Drainage Waters Treated in More than One Treatment Unit	III.1.c.7, Figure 5, Drawing 2, Drawing 3	III-13, Figure 5, Drawing 2, Drawing 3
	If Pump Transfer Needed, Two Lift Pumps Provided	III.1.c.8, Figure 5, Drawing 2, Drawing 3	III-14, Figure 5, Drawing 2, Drawing 3
	Bulk Storage Tanks, Onshore, 112.8 (c)		
(1)	Compatibility of Material and Construction of Tanks to Oil Stored and Conditions of Storage	III.1.c.2., III.7, App. D	III-5, III-91, App. D
(2)	Adequate Secondary Containment	III.1.c.2.,III.3.d.1, III.7, App. D, App. O	III-5, III-47, III-91, App. D, App. O
(3)	Drainage of Rainwater from Diked Areas	III.1.c.8	III-14
(i)	Bypass Valve Sealed Closed	III.1.c.8	III-14
(ii)	Run-off Rainwater Inspected for Water Quality Standards Compliance	III.1.c.8	III-14
(iii)	Bypass Valve Opened and Resealed Properly Following Drainage	III.1.c.8	III-14
(iv)	Records of Discharged Rainwater	App. Q	App. Q
(4)	Underground Tanks	NA	NA
(5)	Partially Buried Tanks	NA	NA
(6)	Aboveground Tanks	III.7, App. Q	III-91, App. Q
	Visual Inspections	NA	NA
(7)	Internal Heating Coils Utilized	NA	NA
(8)	Tanks Fail-safe Engineered		
(i)	Audible High Liquid Level Alarm	III.1.c.5, 3.7	III-7, III-91
	Visual High Liquid Level Alarm	III.1.c.5, 3.7	III-7, III-91
(ii)	Automatic High Liquid Level Pump Cutoff	NA	NA
(iii)	Communications between Gauger and Pumping Station	NA	NA
	Fast Response System of Determining Liquid Level in Tanks	NA	NA
(iv)	Direct Vision Gauges	NA	NA
(v)	Sensing Devices/Gauges Tested Regularly	NA	NA
(9)	Effluent Discharges to Navigable Waters Observed Frequently to Detect Oil Spills	III.1.c.7, III.1.c.8	III-13, III-14
(10)	Visible Oil Leaks Promptly Corrected	III.1.c.8, III.7	III-14, III-91
(11)	Mobile or Portable Oil Storage Tanks	NA	NA
	Facility Transfer Operations, Pumping and In-Plant Processes, Onshore, 112.8 (d)		
(1)	Buried Pipelines Corrosion Protected	III.1.c.5, III.1.c.9	III-7, III-18
(2)	Not-in-service Pipelines Capped with Origin Marked	III.1.c.9	III-18
(3)	Pipe Supports Designed to Minimize Abrasion and Corrosion and Allow for Expansion and Contraction	III.1.c.9	III-18

ENVIRONMENTAL PROTECTION AGENCY Spill Prevention Control and Countermeasure Plan Elements		Found in Plan at:	
Section	**Title**	**Section**	**Page**
(4)	Aboveground Valves and Pipelines Inspected Regularly	III.1.c.9, App. Q	III-18, App. Q
	Spill Containment System Provided	III.1.c.5, III.1.c.9	III-7, III-18
	Periodic Pressure Testing of Valves and Pipelines Conducted	III.1.c.9, App. Q	III-18, App. Q
(5)	Vehicle Traffic Warned of Aboveground and Underground Pipelines	III.7	III-91

(2) EPA Facility Response Plan (FRP)

ENVIRONMENTAL PROTECTION AGENCY Facility Response Plan Elements 40 CFR 112.20		Found In:	
Section	**Title**	**Section**	**Page**
2.0	**Response Plan Cover Sheet**		
2.1	General Information	I.4	1-4
2.2	Applicability of Substantial Harm Criteria	App. P	App. P
2.3	Certification	App. P	App. P
1.1	**Emergency Response Action Plan**		
	Qualified Individual (QI) Information (1.2)	III.3.b.1, 2	III-35, II-ii
	Emergency Notification Phone List (1.3.1)	II.2.a., App. B	II-1, App. B
	Spill Response Notification Form (1.3.1)	II.2.a., App. A	II-1, ERP-00
	Response Equipment List and Location (1.3.2)	III.3.e.6, III.3.f.3, App. H	III-59, III-63, App. H
	Response Equipment Testing/Deployment (1.3.3)	III.3.f.3, App. H, App. J	III-63, App. H, App. J
	Facility Response Personnel (1.3.4)	III.3.b.1, 2	III-35, II-ii
	Evacuation Plans (1.3.5)	App. A	ERP-03
	Immediate Actions (1.7.1)	App. A	ERP-00, ERP-01
	Diagrams (1.9)	Figures 1-5, Diagrams 1-5	Figures 1-5, Diagrams 1-5
1.20	**Facility Information**		
1.2.1	Facility Name, Address, City, County, etc.	I.4.a, I.4.c, I.4.h	I-4, I-5, I-6
1.2.2	Latitude and Longitude	I.4.c	I-5
1.2.3	Wellhead Protection Area	I.4.e	I-5
1.2.4	Owner/Operator	I.4.b	I-4
1.2.5	Qualified Individual (QI) Information	II	II-ii
1.2.6	Oil Storage Start-Up Date	I.4.e	I-5
1.2.7	Facility Operations Description	I.4	I-4
	Standard Industrial Classification (SIC) Code	I.4.e	I-5
1.2.8	Date and Type of Substantial Expansion	NA	NA
1.30	**Emergency Response Information**		
1.3.1	Notification		
	Emergency Notification Phone List	II, App. B	II-ii, App. B
	Spill Response Notification Form	App. A	ERP-00 (Form ERP-00-2)
1.3.2	Response Equipment List		
	Skimmers/Pumps	III.3.f.3, App. H, App. J	III-63, App. H, App. J
	Boom	III.3.f.3, App. H, App. J	III-63, App. H, App. J

ENVIRONMENTAL PROTECTION AGENCY Facility Response Plan Elements 40 CFR 112.20		Found In:	
Section	**Title**	**Section**	**Page**
	Chemicals Stored	NA	NA
	Sorbents	III.3.f.3, App. H, App. J	III-63, App. H, App. J
	Hand Tools	III.3.f.3, App. H, App. J	III-63, App. H, App. J
	Communication Equipment	III.3.b.2	III-35
	Fire Fighting and Personnel Protective Equipment	III.3.e.6, Figure 6, App. I	III-59, Figure 6, App. I
	Boats and Motors	III.3.f.3, App. H, App. J	III-63, App. H, App. J
	Others (e.g., Heavy Equipment, Cranes, etc.)	III.3.f.3, App. H, App. J	III-63, App. H, App. J
1.3.3	Response Equipment Testing/Deployment	III.3.f.3, App. H, App. J	III-63, App. H, App. J
1.3.4	Facility Response Personnel	II	II-ii
	Emergency Response Personnel Information	II	II-ii
	Emergency Response Contractor Information	II, App. J	II-ii, App. J
	Facility Response Team Information	II	II-ii
1.3.5	Evacuation Plans		
	Facility Evacuation Plan (1.3.5.1)		
	Location of Stored Materials	App. A, III.1.c.2, III.1.c.3, Figure 4, App. D	ERP-03, III-5
	Hazard Imposed by Spilled Materials (MSDS)	App. S	App. S
	Spill Flow Direction	III.1.c.5, III.3.d.1	III-7, III-47
	Prevailing Wind Directions and Speed	III.3.d.1	III-47
	Water Currents, Tides or Wave Conditions	III.3.d.1	III-47
	Personnel and Equipment Arrival Routes	App. A	ERP-01
	Evacuation Routes	App. A, Figure 3	ERP-03, Figure 3
	Alternative Routes of Evacuation	App. A, Figure 3	ERP-03, Figure 3
	Transportation of Injured Personnel	III.3.e.1, III.3.e.4	III-57, III-58
	Location of Alarm/Notification Systems	III.3.b.2	III-35
	Roll Call Area	App. A, Figure 3	ERP-03, Figure 3
	Mitigation Command Center Location	App. A	ERP-00
	Location of Shelter at Facility	App. A	ERP-00
	Community Evacuation Plan Referenced (1.3.5.3)	App. A	ERP-03
1.3.6	Qualified Individual's Duties	III.3.b, III.3.c.3, III.3.d.1	III-26, III-41, III-47
1.40	**Hazard Evaluation**		
1.4.1	Hazard Identification		
	Tanks	III.1.c.2, III.3.d.1, App. D, Figure 4	III-5, III-47, App. D, Figure 4

ENVIRONMENTAL PROTECTION AGENCY Facility Response Plan Elements 40 CFR 112.20		Found In:	
Section	**Title**	**Section**	**Page**
	Surface Impoundments	III.1.c.2, III.3.d.1, App. D, Figure 4, App. O	III-5, III-47, App. D, Figure 4, App. O
	Labeled Schematic Drawing	Figure 4	Figure 4
	Description of Transfers and Volume of Material	III.1.c.2, III.1.c.5	III-5, III-7
	Description of Daily Operations	III.1.c.6	III-11
	Secondary Containment Volumes	III.3.d.1, App. D, Figure 4, App. O	III-47, App. D, Figure 4, App. O
	Normal Daily Throughput	III.1.c.6	III-11
1.4.2	Vulnerability Analysis	II.2.c, III.3.d.1, App. C	II-4, III-47, App. C
1.4.3	Analysis of the Potential for an Oil Spill		
	Description of Likelihood of Release	III.3.d.1	III-47
1.4.4	Facility Reportable Oil Spill History	III.4.b, App. K	III-70, App. K
1.50	**Discharge Scenarios**		
1.5.1	Small Discharges		
	Description of Small Discharge Scenario Addressing Facility Operations and Components (1.5.1.1)	III.3.d.1, App.G	III-47, App. G
	Description of Factors Affecting Response Efforts (1.5.1.2)	III.3.d.1, App.G, App. C, App. D, App. H, III.3.d.4	III-47, App. G, App. C, App. D, App. H, IIII-55
1.5.1	Medium Discharges		
	Description of Medium Discharge Scenario Addressing Facility Operations and Components (1.5.1.1)	III.3.d.1, App.G	III-47, App. G
	Description of Factors Affecting Response Efforts (1.5.1.2)	III.3.d.1, App.G, App. C, App. D, App. H, III.3.d.4	III-47, App. G, App. C, App. D, App. H, IIII-55
1.5.2	Worst-Case Discharge		
	Correct Worst Case Discharge Calculation	App. F	App. G
	Description of Worst Case Discharge Scenario	III.3.d.1, App.G	III-47, App. G
	Description of Factors Affecting Response Efforts (1.5.1.2)	III.3.d.1, App.G, App. C, App. D, App. H, III.3.d.4	III-47, App. G, App. C, App. D, App. H, IIII-55
1.60	**Discharge Detection Systems**		
1.6.1	Discharge Detection by Personnel		
	Description of Procedures and Personnel for Spill Detection	III.7, III.3.d.1, II, App. A	III-91, III-47, II-ii, App. A
	Description of Facility Inspections	App. Q	App. Q
	Description of Initial Response Actions	III.7, App. A	III-91, ERP-00
	Emergency Response Information (Referenced)	III.7, App. A	III-91, ERP-00
1.6.2	Automated Discharge Detection		
	Description of Automatic Spill Detection Equipment	III.7	III-91
	Description of Alarm Verification Procedures and Subsequent Actions	III.7	III-91

ENVIRONMENTAL PROTECTION AGENCY Facility Response Plan Elements 40 CFR 112.20		Found In:	
Section	**Title**	**Section**	**Page**
1.70	**Plan Implementation**		
1.7.1	Identification of Response Resources for Small, Medium, and Worst-Case Spills		
	Description of Response Actions		
	- Emergency plans for spill response	III.7, App. A	III-91, ERP-00
	- Additional response training	III.5, App. L, App. M	III-71, App. L, App. M
	- Additional contracted help	App. J	App. J
	- Access to additional response equipment/experts	App. J	App. J
	- Ability to implement plan, including response training and drills	III.5, App L, App. M	III-71, App. L, App. M
1.7.2	Disposal Plans		
	Description of Procedures for Recovering, Reusing, Decontaminating or Disposing of Materials	III.3.d.4	III-55
	Materials Addressed in Disposal Plan	III.1.c.5, App. B, III.3.c.6	III-7, App. B, III-43
	Plan Prepared in Accordance with Federal, State, and Local Regulations	III.2.c	III-21
	Plan Addresses Permits Required to Transport or Dispose of Recovered Materials	III.3.d.4	III-55
1.7.3	Containment and Drainage Planning		
	Description of Containing/Controlling a Spill through Drainage		
	- Containment Volume	III.7, App. D, App. O	III-91, App. D, App. O
	- Drainage route from oil storage and transfer areas	III.1.c.7, III.1.c.8	III-13, III-14
	- Construction materials in drainage troughs	App. D	App. D
	- Type and number of valves and separators in drainage system	III.1.c.7, III.1.c.8	III-13, III-14
	- Sump Pump capacities	III.1.c.7, III.1.c.8	III-13, III-14
	- Containment capacities of weirs and booms and their locations	App. H	App. H
	- Other clean up materials	App. H	App. H
1.80	**Self-Inspection, Training, and Meeting Logs**		
1.8.1	Facility Self-Inspection		
	Tank Inspections	III.7, App. Q	III-91, App. Q
	Secondary Containment Inspections	III.7, App. Q	III-91, App. Q
	Response Equipment Inspections	App. Q	App. Q
	Response Equipment Log	App. Q	App. Q
1.8.2	Facility Drills/Exercises		
	Description of Drill/Exercise Program Based on PREP Guidelines		

ENVIRONMENTAL PROTECTION AGENCY Facility Response Plan Elements 40 CFR 112.20		Found In:	
Section	**Title**	**Section**	**Page**
	- QI Notification Drill	III.5.a	III-71
	- Spill management team tabletop exercise	III.5.c	III-82
	- Equipment deployment exercise	III.3.f.3	III-63
	- Unannounced exercise	III.5.a	III-71
	- Area Exercise	III.5.c	III-82
	Description of Evaluation Procedures for Drill Program		
	Qualified Individual Notification Drill Log (1.8.1.2)	App. M	App. M
	Spill Management Team Tabletop Drill Log (1.8.2.2)	App. M	App. M
1.8.3	Response Training	III.5, App. L., App. M	III-71, App. L, App. M
	Personnel Response Training Logs	III.5, App. L., App. M	III-71, App. L, App. M
	Discharge Prevention Meeting Logs	III.5, App. L., App. M	III-71, App. L, App. M
1.9	**Diagrams**		
	Site Plan Diagram	III.1.a, III.1.b	III-1, III-1
	- Entire facility to scale	Figure 2	Figure 2
	- Facility above and below ground oil transfer piping	Figure 4	Figure 4
	- Above and below-ground tanks	Figure 4	Figure 4
	- Contents and capacity of bulk oil storage	Drawing 4	Drawing 4
	- Process Buildings	Figure 4	Figure 4
	- Transfer Areas	Figure 4	Figure 4
	- Location and capacity of secondary containment systems	Figure 4	Figure 4
	- Location of hazardous materials	Figure 4	Figure 4
	- Location of communications and emergency response equipment	Figure 4, App. Q	Figure 4, App. Q
	- Location of electrical equipment that might contain oil	Figure 4	Figure 4
	Site Drainage Plan Diagram		
	- Major sanitary and storm sewers, manholes, and drains	Figure 5	Figure 5
	- Weirs and shut-off valves	NA	NA
	- Surface water receiving streams	Figure 1	Figure 1
	- Fire fighting water resources	Figure 4	Figure 4
	- Other Utilities	Figure 4	Figure 4
	- Response personnel ingress and egress	Figure 4	Figure 4
	- Response equipment transportation routes	Figure 4	Figure 4
	- Direction of spill flow from discharge points	Figure 1	Figure 1

ENVIRONMENTAL PROTECTION AGENCY Facility Response Plan Elements 40 CFR 112.20		Found In:	
Section	**Title**	**Section**	**Page**
	Site Evacuation Plan Diagram (Evacuation Routes, Regrouping Areas)		
	- Evacuation routes	Figure 4	Figure 4
	- Location of regrouping areas	Figure 3	Figure 3
1.1	**Site Security**	III.3.e.2, III.7	III-57, III-91

Notes:
1. App. = Appendix

(3) OSHA Emergency Action Plans (29 CFR 1910.38(a) and Process Safety (29 CFR 1910.119)

OSHA Emergency Action Plans (29 CFR 1910.38(a)) and Process Safety (29 CFR 1910.119)	ICP Citation(s)
1910.38(a) Emergency action plan	
(1) Scope and applicability	III.3.c.(1) III.3.d
(2) Elements	
(i) Emergency escape procedures and emergency escape route assignments	II.2 II.2.c III.3.b.(3) III.3.c
(ii) Procedures to be followed by employees who remain to operate critical plant operations before they evacuate	II.2 II.2.c II.2.e III.3.c
(iii) Procedures to account for all employees after emergency evacuation has been completed	II.2.a III.3.b.(2) III.3.b.(3) III.3.c III.4
(iv) Rescue and medical duties for those employees who are to perform them	III.3.b.(3) III.3.c III.3.c.(7) III.3.e.(1)
(v) The preferred means of reporting fires and other emergencies	II.2.a III.3.b
(vi) Names or regular job titles of persons or departments who can be contacted for further information or explanation of duties under the plan	I.4.f II.2.a III.3.b.(2) III.3.b.(4)
(3) Alarm system	II.2.a III.3.c.(3) III.3.e.(3)
(4) Evacuation	II.2.d III.3.b.(3) III.3.c.(3) III.3.d III.3.d.(1)
(5) Training	III.3.e.(5) III.5
1910.119 Process safety management of highly hazardous chemicals	
(e)(3)(ii) Investigation of previous incidents	III.4 III.4.b
(e)(3)(iii) Process hazard analysis requirements	III.3.e.(3)
(g)(1)(i) Employee training in process/operating procedures	III.5
(j)(4) Inspection/testing of process equipment	III.3.e.(6)
(j)(5) Equipment repair	III.3.e.(6)
(l) Management of change(s)	III.5
(m) Incident investigation	III.4.a
(n) Emergency planning and response	I.1 II.1 II.2 II.2.d III.2 III.2.a III.2.b
(o)(1) Certification of compliance	III.6
1910.165 Employee alarm systems	
(b) General requirements	II.2.a
(b)(1) Purpose of alarm system	II.2.a
(b)(4) Preferred means of reporting emergencies	II.2.a
(d) Maintenance and testing	III.3.e.(6)

(4) OSHA HAZWOPER (29 CFR 1910.120)

OSHA HAZWOPER (29 CFR 1910.120)	ICP Citation(s)
1910.120(k) Decontamination	III.3.c.(6)
1910.120(l) Emergency response program	I.1
(1) Emergency response plan	
(i) An emergency response plan shall be developed and implemented by all employers within the scope of this section to handle anticipated emergencies prior to the commencement of hazardous waste operations	
(ii) Employers who will evacuate their employees from the workplace when an emergency occurs, and who do not permit any of their employees to assist in handling the emergency, are exempt from the requirements of this paragraph if they provide an emergency action plan complying with section 1910.38(a) of this part	
(2) Elements of an emergency response plan	
(i) Pre-emergency planning and coordination with outside parties	I.4.f II.2.b II.2.c III.2.b III.2.c III.3.b.(4) III.3.d
(ii) Personnel roles, lines of authority, and communication	I.4.f II.2.b III.2.a III.2.c III.3.b.(4) III.3.e.(4)
(iii) Emergency recognition and prevention	II.1 III.7
(iv) Safe distances and places of refuge	III.3.b.(3) III.3.d.(2)
(v) Site security and control	III.3.d.(2) III.3.e.(2)
(vi) Evacuation routes and procedures	II.2.d III.3.b.(3)
(vii) Decontamination procedures	III.3.c.(6)
(viii) Emergency medical treatment and response procedures	II.2.d III.3.c.(7) III.3.e.(1)
(ix) Emergency alerting and response procedures	II.2 II.2.a II.2.f II.4 III.2 III.2.a III.2.b III.2.c III.3.d
(x) Critique of response and follow-up	II.3 III.4 III.4.a III.6
(xi) PPE and emergency equipment	III.3.e.(6) III.3.f.(3) III.3.d.(2) III.3.e.(6) III.3.f.(3)
(3) Procedures for handling emergency incidents	
(i) Additional elements of emergency response plans	
(A) Site topography, layout, and prevailing weather conditions	III.1.c
(B) Procedures for reporting incidents to local, state, and federal government agencies	II.2.a III.2
(ii) The emergency response plan shall be a separate section of the Site Safety and Health Plan	
(iii) The emergency response plan shall be compatible with the disaster, fire, and/or emergency response plans of local, state, and federal agencies	III.3.e
(iv) The emergency response plan shall be rehearsed regularly as part of the overall training program for site operations	III.5

OSHA HAZWOPER (29 CFR 1910.120)	ICP Citation(s)
(v) The site emergency response plan shall be reviewed periodically and, as necessary, be amended to keep it current with new or changing site conditions or information	
(vi) An employee alarm system shall be installed in accordance with 29 CFR 1910.165 to notify employees of an emergency situation; to stop work activities if necessary; to lower background noise in order to speed communications; and to begin emergency procedures	
(vii) Based upon the information available at time of the emergency, the employer shall evaluate the incident and the site response capabilities and proceed with the appropriate steps to implement the site emergency response plan	II.2.c II.2.d
1910.120(p)(8) Emergency response program	I.1
(i) Emergency response plan	
(ii) Elements of an emergency response plan	
(A) Pre-emergency planning and coordination with outside parties	I.4.f II.2.b II.2.b III.2.b III.2.c III.3.b.(4) III.3.d
(B) Personnel roles, lines of authority, and communication	I.4.f II.2.b III.2.c III.2.c III.3.b.(4) III.3.e.(4)
(C) Emergency recognition and prevention	II.1 III.7
(D) Safe distances and places of refuge	III.3.b.(3) III.3.d.(2)
(E) Site security and control	III.3.d.(2) III.3.e.(2)
(F) Evacuation routes and procedures	II.2.d III.3.b.(3)
(G) Decontamination procedures	III.3.c.(6)
(H) Emergency medical treatment and response procedures	II.2.d III.3.c.(7) III.3.e.(1)
(I) Emergency alerting and response procedures	II.2 II.2.a II.2.f II.4 III.2 III.2.a III.2.b III.2.c III.3.d
(J) Critique of response and follow-up	II.3 III.4 III.4.a III.6
(K) PPE and emergency equipment	III.3.e.(6) III.3.f.(3) III.3.d.(2) III.3.e.(6) III.3.f.(3)

(iii) Training	III.5
(iv) Procedures for handling emergency incidents	
(A) Additional elements of emergency response plans	
(1) Site topography, layout, and prevailing weather conditions	III.1.c III.3.d.(1)
(2) Procedures for reporting incidents to local, state, and federal government agencies	II.2.a III.2
(B) The emergency response plan shall be compatible and integrated with the disaster, fire and/or emergency response plans of local, state, and federal agencies	III.3.e
(C) The emergency response plan shall be rehearsed regularly as part of the overall training program for site operations	
(D) The site emergency response plan shall be reviewed periodically and, as necessary, be amended to keep it current with new or changing site conditions or information	
(E) An employee alarm system shall be installed in accordance with 29 CFR 1910.165	
(F) Based upon the information available at the time of the emergency, the employer shall evaluate the incident and the site response capabilities and proceed with the appropriate steps to implement the site emergency response plan	II.2.d II.2.e III.3.d.(1)
1910.120(q) Emergency response to hazardous substance releases	
(1) Emergency response plan	III.3.1
(2) Elements of an emergency response plan	
(i) Pre-emergency planning and coordination with outside parties	I.4.f II.2.b II.2.c III.2.b III.2.c III.3.b.(4) III.3.d
(ii) Personnel roles, lines of authority, training, and communication	I.4.f II.2.b III.2.b III.2.c III.3.b.(4) III.3.e.(4)
(iii) Emergency recognition and prevention	II.1 III.7
(iv) Safe distances and places of refuge	III.3.b.(3) III.3.d.(2)
(v) Site security and control	III.3.d.(2) III.3.e.(2)
(vi) Evacuation routes and procedures	II.2.d III.3.b.(3)
(vii) Decontamination procedures	III.3.c.(6)
(viii) Emergency medical treatment and response procedures	II.2.d III.3.c.(7) III.3.e.(1)
(ix) Emergency alerting and response procedures	II.2 II.2.a II.2.f II.4 III.2 III.2.a III.2.b III.2.c III.3.d
(x) Critique of response and follow-up	II.3 III.4 III.4.a III.6
(xi) PPE and emergency equipment	III.3.e.(6) III.3.f.(3) III.3.d.(2) III.3.e.(6) III.3.f.(3)
(xii) Emergency response plan coordination and integration	III.3.e III.8

(3) Procedures for handling emergency response	
(i) The senior emergency response official responding to an emergency shall become the individual in charge of a site-specific Incident Command System (ICS)	II.2.b III.3 III.3.a III.3.b III.3.b.(1) III.3.b.(2) III.3.e.(3)
(ii) The individual in charge of the ICS shall identify, to the extent possible, all hazardous substances or conditions present and shall address as appropriate site analysis, use of engineering controls, maximum exposure limits, hazardous substance handling procedures, and use of any new technologies	II.2.c II.2.d III.3.c.(3)
(iii) Implementation of appropriate emergency operations and use of PPE	II.2.c II.2.d II.2.e III.3.c III.3.c.(1) III.3.d.(1) III.3.d.(2)
(iv) Employees engaged in emergency response and exposed to hazardous substances presenting an inhalation hazard or potential inhalation hazard shall wear positive pressure self-contained breathing apparatus while engaged in emergency response	II.2.d
(v) The individual in charge of the ICS shall limit the number of emergency response personnel at the emergency site, in those areas of potential or actual exposure to incident or site hazards, to those who are actively performing emergency operations	III.3.c III.3.e.(5)
(vi) Backup personnel shall stand by with equipment ready to provide assistance or rescue	II.2.d III.3.e.(5)
(vii) The individual in charge of the ICS shall designate a safety official, who is knowledgeable in the operations being implemented at the emergency response site	II.2.d III.3.b.(3)
(viii) When activities are judged by the safety official to be an IDLH condition and/or to involve an imminent danger condition, the safety official shall have authority to alter, suspend, or terminate those activities	III.3.b.(3)
(ix) After emergency operations have terminated, the individual in charge of the ICS shall implement appropriate decontamination procedures	III.3.c.(6)
(x) When deemed necessary for meeting the tasks at hand, approved self-contained compressed air breathing apparatus may be used with approved cylinders from other approved self-contained compressed air breathing apparatus provided that such cylinders are of the same capacity and pressure rating	
(4) Skilled support personnel	
(5) Specialist employees	
(6) Training	III.5
(7) Trainers	
(8) Refresher training	
(9) Medical surveillance and consultation	
(10) Chemical protective clothing	
(11) Post-emergency response operations	

(5) EPA's Risk Management Program (40 CFR part 68)

EPA's Risk Management Program (40 CFR part 68)	ICP Citation(s)
68.20-36 Offsite consequence analysis	III.3.d.(1)
68.42 Five-year accident history	III.4.b
68.50 Hazard review	III.3.d.(1)
68.60 Incident investigation	III.4.a
68.67 Process hazards analysis	III.3.d.(1)
68.81 Incident investigation	III.4.a
68.95(a) Elements of an emergency response program	
(1) Elements of an emergency response plan	
(i) Procedures for informing the public and emergency response agencies about accidental releases	II.2.a III.2
(ii) Documentation of proper first-aid and emergency medical treatment necessary to treat accidental human exposures	III.3.c.(7) III.3.e.(1)
(iii) Procedures and measures for emergency response after an accidental release of a regulated substance	II.1 II.2

EPA's Risk Management Program (40 CFR part 68)	ICP Citation(s)
	II.3 II.4 III.3.a - c
(2) Procedures for the use of emergency response equipment and for its inspection, testing, and maintenance	III.3.e.(6)
(3) Training for all employees in relevant procedures	III.5
(4) Procedures to review and update the emergency response plan	III.6
68.95(b) Compliance with other federal contingency plan regulations	
68.95© Coordination with the community emergency response plan	

(6) Hazardous Waste Contingency Plan (40 CFR part 265)

RCRA Hazardous Waste Contingency Plan Elements (40 CFR 265)	Description	Found in Plan at:	
		Section	Page
Subpart C	Preparedness and Prevention		
265.31	Maintenance and Operation of Facility	I 4	I-1
265.32	Required Equipment		
(a)	Internal Communications or Alarm System	III 3.b.2	III-35
(b)	Device Capable of Summoning Emergency Assistance	III 3.b.2	III-35
(c)	Portable Fire Extinguishers, Fire Control Equipment, Spill Control Equipment, Decontamination Equipment	III 3.e.6., App. I	III-59, App. I
(d)	Water at Adequate Volume and Pressure	III 3.e.6., App. I	III-59, App. I
265.33	Testing and Maintenance of Equipment	III 3.e.6.	III-59
265.34	Access to Communications or Alarm System	III 3.b.2.	III-35
(a)	Access to Internal Alarm or Emergency Communication Device During Hazardous Waste Handling	III 3.b.2.	III-35
(b)	Access to Device Capable of Summoning Emergency Assistance	III 3.b.2.	III-35
265.35	Required Aisle Space	III 3.d.4.	III-55
265.37	Arrangements With Local Authorities		
(a)	Arrangements with:		
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(2)	Primary Emergency Authority	III 3.b.	III-26
(3)	State Emergency Response Teams, Emergency Response Contractors, Equipment Suppliers	III 3.b.	III-26
(4)	Local Hospitals	III 3.b.	III-26
(b)	Documentation of Refusal for Arrangements	III 3.b.	III-26
Subpart D	Contingency Plan and Emergency Procedures		
265.51	Purpose and Implementation of Contingency Plan		
(a)	Facility Contingency Plan Designed to Minimize Hazards to Human Health and Environment	I 1	I-1
(b)	Plan Must Be Instituted Whenever There Is Threat	III 3	III-26
265.52	Content of Contingency Plan	I i	i
(a)	Emergency Response Actions	II 2, App. A	II-1, App. A
(b)	Incorporation into Existing SPCC Plan		
(c)	Arrangements with Police, Fire and Emergency Response Teams	III 3.b.	III-26
(d)	Emergency Coordinator Information	I 1	I-1
(e)	Emergency Equipment List	App. H	App. H
(f)	Evacuation Plan	II 2, App. A	II-1, App. A
265.53	Copies of Contingency Plan	III 3.b, App. R	III-26, App. R
265.54	Amendment of Contingency Plan	III 6.a	III-85
265.55	Emergency Coordinator	II-ii	II-ii
265.56	Emergency Procedures		
(a)	Whenever There Is Imminent or Actual Emergency, Emergency Coordinator Must Immediately:	II 2, App. A	II-1, App. A
(1)	Activate Facility Alarms or Communication Systems	II 2, App. A	II-1, App. A
(2)	Notify State or Local Response Agencies	II 2, App. A	II-1, App. A
(b)	Whenever There Is Release, Fire or Explosion, Emergency Coordinator Must Identify Character, Exact Source, Amount and Extent of Release Materials and		
(c)	Assess Possible Hazards to Human Health or Environment	II 2.d.	II-4
Subpart I	Use and Management of Containers		
265.171	Condition of Containers	III 3.d.4.	III-55
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265.173	Management of Containers	III 3.d.4.	III-55
(a)	Containers Storing Hazardous Waste Must Be Closed	III 3.d.4.	III-55
(b)	Containers Storing Hazardous Waste Must Not Leak	III 3.d.4.	III-55
265.174	Inspections	III-7, App. Q	III-91, App. Q
265.177	Special Requirements for Incompatible Wastes		
(a)	Incompatible Wastes Must Not Be Placed in Same Container	NA	NA

(b)	Hazardous Wastes Must Not Be Placed in Unwashed Container that Previously Held Incompatible Wastes	NA	NA
(c)	Incompatible Wastes Must Be Stored in Areas Separated by Secondary Containment	NA	NA