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KEYSPAN

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December 15, 2005

VIA OVERNIGHT MAIL
Hon. Jaclyn A. Brilling, Secretary
New York State Department of Public Service
Three Empire State Plaza
Albany, NY 12223-1350

Re: Case No. 04-T-1687 – LIPA Newbridge Connector Project

Dear Secretary Brilling:

Pursuant to the Joint Proposal and Certificate Conditions filed on October 21, 2005 in the above-captioned proceeding, enclosed for filing are four copies of the Environmental Management and Construction Plan ("EM&CP") for Phase 2 of the Newbridge Connector Project in the above referenced proceeding. The accompanying Notice of the filing of the EM&CP required by the Certificate Conditions in the Joint Proposal, which will be served on all parties required by Certificate Conditions, is attached to the EM&CP.

Also enclosed is a Certificate of Service of the EM&CP on the parties listed on the attached Service List. Additional copies will be served on any other New York State agency (and its relevant regional offices) which requests the document as well on any active parties on the service list who request the Phase 2 EM&CP.

A copy of written notice of filing the Phase 2 EM&CP will be shortly be served on all active parties to this proceeding, on each person on the Commission's service list considered potentially affected by the subject matter in the EM&CP, and on all statutory parties to this proceeding.

Please call me if you have any questions.

Very truly yours,

Anna S. Chacko
Attorney for LIPA

STATE OF NEW YORK)
) SS.:
COUNTY OF ERIE)

CERTIFICATE OF SERVICE

I, Joseph Forti, being duly sworn, deposes and says that I have this day served true and complete copies of the *Environmental Management and Construction Plan for Phase II of the Newbridge Connector Project* upon each person designated in the attached Service List by UPS Next Day Air service.

Dated: December 15, 2005

Joseph Forti

Sworn to before me

this 15 day of December, 2005

Notary Public

JANET A STEINBRUCKNER
NOTARY PUBLIC STATE OF NEW YORK
No 01ST4809341
QUALIFIED IN ERIE COUNTY
Commission Expires. OCT 31, 2006

SERVICE LIST

(for EM&CP Phase 2 pursuant to paragraph 18 to Appendix D of the Joint Proposal)

Jaclyn A. Brilling *(4 copies-- only hers included the Certificate of Service and Service List)*
New York State Department of Public Service
Three Empire State Plaza
Albany, NY 12223-1350

Andrew Davis
New York State Department of Public Service
Three Empire State Plaza
Albany, New York 12223-1350

Paul Agresta
New York State Department of Public Service
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State of New York Department of Transportation
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Commissioner of Parks
c/o Petra Kreshik
Associate Counsel
New York State Office of Parks, Recreation and Historic Preservation
Empire State Plaza
Agency Building #1
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James Sponable
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c/o Long Island Rail Road
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Richard Bennett, L.S.
Public Lands Surveyor Examiner
Bureau of Land Management
State of New York Executive Department
Office of General Services
Mayor Erastus Corning 2nd Tower
Empire State Plaza
Albany, New York 12242

Joseph Gartner
Poseidon Pool & Spa Recreational
25 Ruland Road
Melville, New York 11747

Hicksville Public Library
169 Jerusalem Avenue
Hicksville, New York 11801

Courtesy copies to:

Cynthia Psoras
Maria Jon
U.S. Environmental Protection Agency
290 Broadway, 20th Floor
New York, New York 10007

Hon. Frank P. Petrone
Town Supervisor
Town of Huntington
100 Main Street
Huntington, NY 11743

Hon. Kate Murray
Supervisor
Town of Hempstead
Town Hall
Town Hall Plaza
Hempstead, NY 11550

Hon. John Venditto
Supervisor
Town of Oyster Bay
Town Hall
54 Audrey Avenue
Oyster Bay, NY 11771

Betsy Hohenstein
New York State
Department of Environmental Conservation
625 Broadway
Albany, NY 12233-1750

Carl Schroeter
Chief Real Estate Negotiator
Nassau County Department of Real Estate Planning and Development
One West Street
Suite 200
Mineola, NY 11501

6.11 Gas System Operations (NY)

6.11.1 As a waste generator organization, meet the responsibilities of Section 6.1, and:

6.11.2 Notify the System Control Center (SCC) or Distribution Central Dispatching (DCD) of a spill or discharge of liquids (e.g., natural gas condensates or oil) or powder immediately upon discovery and provide information for SCC/DCD to complete the Spill Notification Checklist (**Exhibit 9.3**).

6.11.3 Ensure SCC/DCD notifies Environmental Operations & Customer Support Department, and if required the Environmental Engineering & Compliance Department.

6.11.4 If necessary, request Environmental Operations & Customer Support Department support to initiate emergency spill clean-up or cleanup contractor notification.

6.11.5 At any time during normal operations, if liquids or solids (dust) are found in the gas system, a sample shall be collected and forwarded to the Analytical Laboratory for analysis. Testing should be done for concentration of Benzene. Copies of all results shall be provided to Environmental Engineering and Compliance Department. If the frequency of occurrence is considered unusually high, the operating department shall contact Environmental Operations & Customer Support Department to jointly determine a suitable sampling frequency.

6.12 Gas Central Operations (NY), and Gas Field Operations (NY)

6.12.1 As a waste generator organization, meet the responsibilities of Section 6.1, and:

6.12.2 Notify the System Control Center (SCC) or Distribution Central Dispatching (DCD) of a spill or discharge of liquids (e.g., natural gas condensates or oil) or powder immediately upon discovery and provide information for SCC/DCD to complete the Spill Notification Checklist (**Exhibit 9.3**).

6.12.3 Ensure SCC/DCD notifies Environmental Operations & Customer Support Department, and if required the Environmental Engineering & Compliance Department.

6.12.4 If necessary, request Environmental Operations & Customer Support Department support to initiate emergency spill clean-up or cleanup contractor notification.

6.12.5 At any time during normal operations, if liquids or solids (dust) are found in the gas system, a sample shall be collected and forwarded to the Analytical Laboratory for analysis. Testing should be done for

concentration of Benzene. Copies of all results shall be provided to Environmental Engineering and Compliance Department. If the frequency of occurrence is considered unusually high, the operating department shall contact Environmental Operations & Customer Support Department to jointly determine a suitable sampling frequency.

6.13 Fleet Services Department shall be responsible to:

6.13.1 As a waste generator organization, meet the responsibilities of Section 6.1, and:

6.13.2 Notify the System Control Center (SCC) or Central Monitoring Station (CMS) of a spill immediately upon discovery and provide information for SCC/CMC to complete the Spill Notification Checklist (**Exhibit 9.3**).

6.13.3 Ensure SCC/CMS notifies Environmental Operations & Customer Support Department and if required the Environmental Engineering & Compliance Department.

6.13.4 If necessary, request Environmental Operations & Customer Support Department support to initiate emergency spill clean-up or cleanup contractor notification.

6.13.5 Provide field support and access to responding organizations in the event of a spill from the Fleet equipment or facility.

6.14 Maintenance Services Department shall be responsible to:

6.14.1 As a waste generator organization, meet the responsibilities of Section 6.1, and,

6.14.2 Notify the area Supervising Service Operator (SSO) for Distribution System spills or the Electric System Operator (ESO) for Substation or Generating Plant spills immediately upon discovery and provide information for SSO/ESO to complete Spill Notification Checklist (**Exhibit 9.3**),

6.14.3 Ensure ESO/SSO notifies Environmental Operations & Customer Support Department, and if required the Environmental Engineering & Compliance Department.

6.14.4 If necessary, request Environmental Operations & Customer Support Department support to initiate emergency spill clean-up or cleanup contractor notification.

6.14.5 Provide field support and access to responding organizations in the event of a spill from the Fleet equipment or facility.

6.15 Purchasing Section of Purchasing and Materials Management shall be responsible to:

6.15.1 Obtain services of qualified contractors to perform transport, disposal and spill cleanup services related to the management of PCB and hazardous and non-hazardous waste,

6.15.2 Forward all vendor qualification statements, bid solicitations, contractor proposals, contracts and permits to Environmental Engineering and Compliance for technical approval.

6.16 Claims shall be responsible to:

6.16.1 Make restoration arrangements for private property when directed by the SSO, GSO, ESO, Environmental Operations and Customer Support or Environmental Engineering and Compliance.

6.17 Division of Staffing & Development shall be responsible to:

6.17.1 Provide training to Company personnel for non-fuel oil spills to meet the federal, state and local regulations in this procedure.

6.18 Corporate Safety Services Division shall be responsible to:

6.18.1 Establish the training requirements to ensure protection of workers when responding to spills and handling OSHA hazardous materials.

6.19 Contractors providing services which may cause spills:

6.19.1 Notify the Company department with direct supervisory responsibility for the services being provided. Alternatively or if so directed, notify the Supervising Service Operator (SSO), Electric System Operator (ESO), Gas System Operator (GSO), System Control Center (SCC), Distribution Central Dispatching or the Central Monitoring Station (CMS) Operator, as appropriate, of the occurrence of the spill, and provide information to complete the Spill Notification Checklist (**Exhibit 9.3**).

CAUTION

Contractors must assure that all spills are reported to Environmental Operations Department within two hours of their occurrence or discovery. The notification must be made person-to-person (messages left on telephone answering devices are not acceptable).

6.19.2 Stand-by at the scene to ensure impacted or contaminated areas are secure and safe until Company supervision or response support arrives.

6.20 Departments employing contractors which may cause spills:

6.20.1 As a waste generator organization, meet the responsibilities of Section 6.1, and,

6.20.2 Ensure contractors are informed of their responsibilities as outlined in Section 6.1 and 6.16 of this procedure,

6.20.3 When notified of a spill by a Company contractor, obtain the necessary information to complete the Spill Notification Checklist (**Exhibit 9.3**),

6.20.4 Notify the Supervising Service Operator (SSO), Electric System Operator (ESO), Gas System Operator (GSO), System Control Center (SCC), Distribution Central Dispatching (DCD) or the Central Monitoring Station (CMS) Operator, as appropriate, of the occurrence of the spill and provide information to complete the Spill Notification Checklist (**Exhibit 9.3**),

6.20.5 Ensure the SSO/ESO/SCC/DCD/CMS notifies Environmental Operations & Customer Support Department, and if required the Environmental Engineering & Compliance Department,

6.20.6 Initiate spill response activities in accordance with guidelines in Section 7.0. Contact the SSO, ESO, GSO or CMS for assistance, if required (e.g., spill clean-up contractor). Standby at the scene to provide on-site supervision for spill cleanup contractor, if utilized. Support clean-up activities, if required,

6.20.7 Ensure appropriate cost documentation is obtained and action is initiated for reimbursement of costs from the contractor.

6.21 T&D Project Management shall be responsible to:

6.21.1 As a waste generator organization, meet the responsibilities of Section 6.1, and,

6.21.2 If T&D Project Management Department personnel discover a spill, notify the area Supervising Service Operator (SSO) of a spill immediately upon discovery and provide information for SSO to complete Spill Notification Checklist (**Exhibit 9.3**),

6.21.3 Ensure SSO notifies Environmental Operations & Customer Support Department, and if required the Environmental Engineering & Compliance Department,

7.0 INSTRUCTIONS

7.1 General

7.1.1 This section provides guidelines to be followed by Company personnel when dealing with spills from equipment, containers, tanks, vehicles, etc. Certain types of equipment on the Company gas and electric systems may contain PCB's.

7.1.2 **Transformers**

All fluid containing Company transformers contain mineral oil. There are three categories of transformers as defined by EPA.

Non-PCB Transformers - Those which have been tested and found to contain less than 50 ppm PCB or have a manufacturers nameplate stating that the unit contains less than 50 ppm PCB. Those determined (by laboratory testing) to be non-PCB are identified with the Company's "No PCB" label (See **Exhibit 9.1**).

PCB Contaminated Transformers - Transformers which were not specified to contain PCBs but contain another dielectric fluid such as mineral oil and are greater than 50 ppm PCB but less than 500 ppm PCB. No labeling is required on existing inservice PCB contaminated transformers. All mineral oil transformers must be considered "PCB Contaminated" unless tested and found to contain either less than 50 ppm PCB or greater than 500 ppm PCB.

PCB Transformers - Those purchased to contain PCBs such as an Askarel Transformer, were serviced with dielectric fluids containing 500 ppm or greater PCB, or are otherwise known to contain 500 ppm or greater PCB. The Company did not knowingly purchase any transformers that were designed to contain PCBs. If any transformer is found to contain 500 ppm or greater PCB by laboratory analysis, it is either replaced with a non-PCB transformer or serviced to replace the mineral oil.

7.1.3 Capacitors

Generally, all distribution and substation capacitors now contain a non-PCB dielectric fluid. All PCB capacitors on the distribution system were replaced with non-PCB types prior to October 1, 1988. Non-PCB capacitors can be identified as such by the manufacturer's label or by a company "No-PCB's" sticker (see **Exhibit 9.1**).

However, caution should be taken to ensure that no PCBs are present. Any capacitor whether in a substation or on the distribution system, not properly identified shall be treated as "PCB" until a laboratory test is conducted.

7.1.4 Other Electrical Equipment

All other electric equipment (such as oil circuit breakers) or oil recovered from electric equipment or spills, is categorized and labeled in the same manner as transformers, i.e., PCB (greater than 500 ppm PCB), PCB contaminated (50-500 ppm PCB) or non PCB (less than 50 ppm PCB).

7.1.5 Gas Piping and Equipment

Any natural gas condensate, oil, or powders (dusts) found in gas piping and equipment shall be considered "PCB Contaminated" (50-500 ppm PCB) unless a laboratory test is conducted to determine the PCB concentration. Gas line drip waters may be treated as non-PCB in accordance with historical results of laboratory tests. However, gas line drip waters may contain other contaminates which make it a hazardous waste such as benzene or lead.

7.1.6 Oil Filled Cables

Oil filled transmission pipe-type cables should be considered non-PCB. This is based on repeated samples tested to date. Environmental Engineering may request additional samples after any spill.

7.1.7 Mercury sealed gas pressure regulators contain one to three ounces (by weight) of mercury. Retired mercury sealed gas pressure regulators are a hazardous waste. The mercury also is a hazardous waste if it is spilled outside the regulator body. Spills from mercury sealed gas pressure regulators shall be handled by trained personnel in accordance with WM-11006, Handling Mercury Spills in a Customer's House".

7.2 Initial Actions

Immediately upon discovery of any spill from equipment, containers, tanks vehicles, etc., the Company employee should:

7.2.1 Assess extent of the spill and initiate notifications (per Section 7.3).

7.2.2 Secure the area wherever possible by means of caution tape, security cones, etc. (Barricade tape is an M&S item - No. 509002)

7.2.3 Assess the extent of potential health and physical hazard, including the extent of equipment damage.

7.2.4 Determine PCB status if nameplates or labels are on equipment and intact.

7.2.5 Attempt to secure the source of the spill, obtain a sample for PCB analysis and if leak is from a transformer, perform a field test (per Section 7.5) if:

- You are familiar with the hazards (physical and chemical) of the spilled material.
- You have the appropriate personal protective equipment (if applicable).
- You have the proper level of OSHA training (as applicable).

7.2.5 Contain the spill to its present affected area by application of speedi-dry (oil-dry) or earthen dikes around the perimeter of the spill or by placing plastic around or below leaking equipment, containers or tanks.

CAUTION

At no time should any employee endanger their own safety while initially trying to secure a spill.

7.3 Notifications

The type and location of the affected equipment shall determine notifications. See Section 10, Appendix B - Spill Notification Flow Chart for an illustration of the notification process.

The type of information needed to be conveyed includes but is not limited to the following:

- Time and location of spill (include cross street and pole numbers)Equipment responsible and amount of fluid
- What was impacted by the spill (storm drain, water, vehicles, roadways, private property, etc.)
- Results of field test for PCB (taken only of transformer oil) and lab sample number
- Immediate actions taken/assistance required
- Cause of spill, e.g., equipment failure, vehicle accident, etc.

This information is the minimum that will be needed to provide guidance to field crews and inform regulatory agencies. The more complete the information, the better procedures and information can be provided to support field crews in the event of a spill incident. Such information as transformer manufacturer, the quantity of oil spilled, private property, etc. can be essential.

CAUTION

All spills shall be reported immediately in accordance with instructions provided below, in the Spill Notification Directory and various other Contingency Plans.

* * * * * * * * * * *

Failure to report a spill may be a violation of Federal, State or County Regulations, Laws or Codes.

7.3.1 Electric Distribution System

7.3.1.1 The Company employee who discovers a spill from any electrical equipment on the distribution system shall notify the Supervising Service Operator (SSO) for that division, by providing information required by the Spill Notification Checklist (**Exhibit 9.3**).

NOTE

Notification of regulatory agencies must be completed within two hours of the discovery of a spill.

7.3.1.2 The SSO shall utilize the Spill Notification Checklist (**Exhibit 9.3**) and prompt the reporting individual so as much information as possible may be obtained. A copy of this form, when completed shall be forwarded to Environmental Operations & Customer Support.

7.3.1.3 The SSO shall then notify Environmental Operations & Customer Support for all spills and Environmental Engineering for spill classes 2,3 &4 (**see Exhibit 9.8**) as described in the Spill Notification Directory Tab I and provide information from the Spill Notification Checklist.

7.3.1.4 In the case where all information is not immediately available, the SSO should make the above notifications with preliminary information and forward additional details at a later time.

7.3.1.5 Environmental Operations & Customer Support shall make all required initial governmental and regulatory agency notifications

as per the Spill Notification Directory (SND).

7.3.1.6 Environmental Operations & Customer Support shall complete a Spill Incident Report (**Exhibit 9.4**) and the Spill Incident Form (SND TAB I) for each occurrence for use in spill tracking.

7.3.2 Substations and Generating Stations

7.3.2.1 The Company employee who discovers a spill from any piece of electric equipment, containers, tanks, etc. within a substation or generating station shall notify the Electric System Operator (ESO), by providing information required by the Spill Notification Checklist (see **Exhibit 9.3** and Section 7.3.1.1).

NOTE

Notification of regulatory agencies must be completed within two hours of the discovery of a spill.

7.3.2.2 The ESO shall utilize the Spill Notification Checklist (**Exhibit 9.3**) and prompt the reporting individual so as much information as possible may be obtained. A copy of this form, when completed shall be forwarded to Environmental Operations & Customer Support.

7.3.2.3 The ESO shall make required notifications as per the Spill Notification Directory (SND) and complete the Spill Incident Form in Tab I of the SND.

7.3.2.4 In the case where all information is not immediately available, the ESO should make the notifications with preliminary information and forward additional details at a later time.

7.3.2.5 Environmental Operations & Customer Support shall complete a Spill Incident Report (**Exhibit 9.4**) for each occurrence for use in spill tracking

7.3.3 Gas System

7.3.3.1 The Company employee who discovers a spill or release of fluid or powder (dust) from gas equipment or piping shall notify the Gas System Operator (GSO) for LI and the System Control Center

(SCC) or Distribution Central Dispatching (DCD) for NY, by providing information required by the Spill Notification Checklist (see **Exhibit 9.3** and Section 7.3.1.1).

7.3.3.2 The GSO/SCC/DCD shall utilize the Spill Notification Checklist (**Exhibit 9.3**) and prompt the reporting individual so as much information as possible may be obtained. A copy of this form, when completed shall be forwarded to Environmental Operations & Customer Support.

7.3.3.3 The GSO/SCC/DCD shall make required notifications as described in existing "Gas Emergency Procedures".

7.3.3.4 The GSO/SCC/DCD shall then notify Environmental Operations & Customer Support for all spills and Environmental Engineering for spill classes 2, 3 &4 (**see Exhibit 9.8**) as described in the Spill Notification Directory Tab I

7.3.3.5 In the case where all information is not immediately available, the GSO/DCD/SCC should make the notifications with preliminary information and forward additional details at a later time.

NOTE

Notification of regulatory agencies must be completed within two hours of the discovery of a spill.

7.3.3.6 Environmental Operations & Customer Support shall make all required initial governmental and regulatory agency notifications as per the Spill Notification Directory (SND).

7.3.3.7 Environmental Operations & Customer Support shall complete a Spill Incident Report (**Exhibit 9.4**) and the Spill Incident Form (SNF TAB I) for each occurrence for use in spill tracking.

7.3.4 KeySpan Operations Centers or Other Field Sites

7.3.4.1 The Company employee who discovers a spill from any company equipment at an Operations Center or other field location not covered by the above sections shall notify the Central Monitoring Station (CMS) for LI locations, or the System Control Center

(SCC) or Distribution Central Dispatch (DCD) for NY locations, by providing information required by the Spill Notification Checklist (see **Exhibit 9.3** and Section 7.3.1.1).

7.3.4.2 The CMS/SCC/DCD shall utilize the Spill Notification Checklist (**Exhibit 9.3**) and prompt the reporting individual so as much information as possible may be obtained. A copy of this form, when completed shall be forwarded to Environmental Operations & Customer Support.

7.3.4.3 The CMS/SCC/DCD shall then notify Environmental Operations & Customer Support for all spills and Environmental Engineering for spill classes 2,3 &4 (**see Exhibit 9.8**)as described in the Spill Notification Directory Tab I

7.3.4.4 In the case where all information is not immediately available, the CMS/SCC/DCD should make the above notifications with preliminary information and forward additional details at a later time.

7.3.4.5 Environmental Operations & Customer Support shall make all required initial governmental and regulatory agency notifications as per the Spill Notification Directory (SND).

7.3.4.6 Environmental Operations & Customer Support shall complete a Spill Incident Report (**Exhibit 9.4**) and the Spill Incident Form (SND TAB I) for each occurrence for use in spill tracking.

7.4 Worker Handling and Protection

7.4.1 This section has been prepared to assist employees in the selection and use of personal protective equipment when engaged in spill cleanup response.

7.4.2 The personal protective equipment supplied in the "Personal Protective Kit" (M&S No. 00101701) will afford protection against oil/PCBs which can become airborne or that can contact the skin and clothing or get into the eyes. Any item in the kit used in a PCB cleanup shall be considered contaminated and shall be disposed along with other cleanup debris. Hand tools such as wrenches, shovels, etc., shall be wiped with a clean rag soaked in "oil cleaner" (M&S No. 00126053) and can be reused. Employees who are engaged in cleanup activities are advised to wash their hands and exposed skin before eating, drinking, smoking or using toilet facilities, during and after a cleanup.

CAUTION

Action taken to cleanup a hazardous material or waste (including PCB) spill may require OSHA training in accordance with 29 CFR 1910.120. Each organization shall determine with Corporate Safety Services Division the required level of OSHA training to respond to spills of material which is routinely handled.

7.4.3 It is recommended that during a cleanup involving an ongoing or recent spill, gloves, boots, monogoggles and coveralls be worn so as to eliminate personal body or clothing contamination. However, the only mandatory equipment to be worn is rubber gloves, disposable boots and monogoggles.

Oil Spill Personal Protective Kits (M&S No. 00101701)

1. Chemical Resistant Coveralls
2. Monogoggles
3. Rubber Gloves
4. Rubber Boots
5. Organic Vapor Respirator

7.4.4 On spills involving PCB capacitors (i.e., at substations) which have completely blown the bottoms out and fluid has been released over a large area, it is recommended that the organic vapor respirator be worn. Employees involved in these cleanups should rotate work activity between individuals so that fresh air breaks can be taken with greater frequency than normal workdays.

7.4.4 In situations where there has been a PCB capacitor fire or for high concentration PCB spills in confined spaces, special respiratory protection is warranted. Contact Environmental Operations & Customer Support for the appropriate response action and cleanup support. In these situations, the appropriate initial response is immediate evacuation to a suitable upwind location.

7.4.5 Personal protective equipment recommended during normal operations involving PCB liquids and dusts are as follows:

7.4.5.1 Liquids –

Workers should wear impenetrable gloves, such as rubber or neoprene (M&S 00541 series) when handling contaminated tools or equipment. Disposable coveralls (M&S #00136300) may be

worn when working in contaminated areas. If the scope of work requires long term exposure, respirators (M&S #00557034) with organic vapor cartridges (M&S #00557037) may be worn provided the worker has undergone Corporate Respirator Training and has been proven medically fit to wear a respirator. Organic vapor cartridge respirators are NOT adequate for confined space work. Appropriate confined space procedures MUST be followed for such conditions.

7.4.5.2 Dusts –

Workers should wear impenetrable gloves or work gloves (provided they are dedicated to PCB dust related tasks) when handling dusts that may contain PCBs. If exposure is prolonged, workers may wear disposable dust masks (M&S #00501164) and disposable coveralls (M&S #00524500 series). Protective goggles are also recommended (M&S #00542166).

7.4.6 In the event of spills of hazardous or non-hazardous material/waste, Environmental Operations should be contacted for specific instructions and precautions.

7.5 Sampling

7.5.1 For transformers not identified by nameplate or labeling as "No PCBs" a "Quick Kit" (Chlor-N-Oil Field Test Kit For Transformer Oils or approved equivalent) should be used to obtain preliminary results.

7.5.1.1 If a clean sample can be obtained directly from the transformer, the "Quick Kit" analysis can be used to determine if the PCB content in the oil is less than, or greater than, 50 ppm (the actual number is probably closer to 40 ppm).

7.5.1.2 These "Quick Kits" are stored at each of the Riverhead, Brentwood, Hicksville and Hewlett Customer Service Departments and are available through storerooms as M&S Stock Item Number 00101008. (NOTE: only the 50 ppm range kit should be used, a 500 ppm kit is available but should not be used for initial testing.) These kits enable Company crews to have an immediate determination of possible PCB's in the oil contained in electrical equipment involved in spills or requiring field servicing.

7.5.1.3 The "Quick Kits" are subject to interferences which may lead to "false positive" results. Field experience has shown that water, burnt oil, salt spray, sweat, poor kit storage conditions (heat) and expired shelf life often yield false positive results. Be sure to check the expiration date indicated on the end of the box. It should be noted that the kit actually measures chloride, not PCB. If a

positive result is obtained, the test should be repeated to confirm the positive result indicating the oil may contain 50 ppm or greater PCB.

7.5.2 Regardless of component labeling or "Quick Kit" results, a sample for analysis at the Analytical Laboratory shall be taken from each spill. A Sampling Kit has been assembled for use, and is a stock item (M&S No. 00101702). The kit provides all the necessary equipment needed to take either an oil, soil or swab sample. Instructions for proper sampling are contained in the kit as well as a sample label which should be used so that analysis can be tracked back to the piece of equipment sampled.

7.5.2.1 Fluid samples should contain a minimum of 1 ounce of liquid in a sample jar and placed in a sample bag with a properly completed label affixed.

7.5.2.2 Soil or Solids (dust) samples should be taken with a clean sampling device (e.g. tongue depressor) and placed in the provided sample jar which should be filled. The jar should then be placed in a sample bag and label affixed.

7.5.2.3 Swab or Wipe samples should be taken by wiping the surface to be sampled with a 12 ply, 3 inch x 3 inch sterile gauze pad (saturated with hexane) on a surface of 100 sq. cm. (about 4 x 4 inches). The swabs should then be packaged in a sample vial, labeled with a description of the location.

7.5.3 All samples regardless of "non PCB" labeling or "Quick Kit" results must be sent to the Analytical Laboratory for complete analysis by gas chromatography for confirmation. Analytical results will be telephoned back to the sampling department within several hours to several days depending on work load and priority.

7.5.4 For all spills into soils beneath pad mount transformers or any spill requiring excavation below 12 inches, post clean up soil samples must be taken for either PCB or oil and grease/TPH analysis.

7.5.5 Any gas line drip liquids must be sampled and sent to the Analytical Laboratory for analysis. Gas line drip liquids including water may contain benzene in excess of .5 ppm and as a result may be considered a hazardous waste. See Reference 4.5.13 for additional information.

7.6 Cleanup

Cleanup and disposal may be by Company personnel, or an outside vendor may be used. Environmental Operations & Customer Support has established contracts with approved vendors. The Spill Notification Directory contains a listing of the qualified vendors. However, prior to calling an outside vendor it

should be verified with Environmental Operations and Customer Support that the particular vendor is still approved for use and a valid contract is in existence.

7.6.1 Spill Supervision:

In most cases, the Field Supervisor of the response crew (or Environmental Operations & Customer Support if involved), will have control over the timing, type and extent of cleanup. In severe spills or those PCB spills where Environmental Operations & Customer Support's participation is necessary, Environmental Operations & Customer Support will determine the type and extent of cleanup. In the event Regulatory Agencies are present, (Nassau County Health Department; Suffolk County Department of Health; New York State DEC), they will determine (within reason) the extent of cleanup.

7.6.2 General:

If the spill is "Non PCB", the extent of the cleanup will be determined by visual inspection. All spilled material is required to be removed.

Cleanup of spills containing PCBs must be initiated within 24 hours after the Company becomes aware of the spill. Small spills (<270 gal of untested mineral oil, low concentration PCB) must be cleaned up within 48 hrs. Although delays due to adverse weather, lack of access, emergency operating conditions and civil emergencies are acceptable, delays due to weekend or overtime costs are specifically listed as not acceptable as a reason for missing the 48-hour deadline.

If the spill is "PCB" or "PCB contaminated", hazardous or non-hazardous the initial cleanup will consist of removing all affected materials as determined by visual inspection. PCB or other chemical analysis of soil from the area will determine the final cleanup after the initial cleanup. By law, we are required to remove any contaminated item and to clean to a level of 10 ppm PCB or 10 ug/100 sq. cm. on hard surfaces (see **Exhibit 9.5** for PCB spills).

Non-hazardous or hazardous material or waste spills will generally require cleanup to standards determined by applicable regulatory agencies.

When responding to a spill where the affected ground is snow or ice covered, a follow-up visit should be performed to verify spill cleanup is complete.

7.6.3 Spills on grass, soil, or sand:

Mineral oil or dielectric fluid travels very slowly through grass and soil. In most cases, cleanup consists of removing the sod or the top 2-4 inches of soil. If over 500 ppm PCB oil is involved, 10 inches of soil must be removed and for any spill over 500 ppm, samples must be collected from the bottom of the excavation for PCB analysis prior to backfilling. Spills

onto sand or coarse soils travel much faster and will most likely need contractor assistance for cleanup. The cleanup crew (Company or contractor) is responsible for immediately backfilling excavations resulting from non-PCB spill cleanups. Spills involving PCBs shall be made safe pending post cleanup sampling results. The on-site supervisor may determine that backfilling is the only method to make a site absolutely safe and may do so with the knowledge that the backfill may need to be removed at a later date and disposed of as hazardous waste pending post cleanup analyses.

7.6.4 Spills on trees and shrubs:

Trees and shrubs that give the appearance of being wet with oil should be pruned back to the non-affected area.

If the affected area is private property, assure the owner that it is the Company's intent to restore the property to its former condition. Obtain the name, address and phone number of the owner and forward to Claims. If the owner is not available for notification, the cleanup crew supervisors or Environmental Operations representative is responsible for preparing and placing a copy of the "Property Absence Notification Letter" (FC-10126) in the owner's mailbox. Check the version of the form to assure that the Claims phone number is 516-545-5353. If incorrect, cross-out the old number and write in the new (see **Exhibit 9.6**).

7.6.5 Spills into storm drains, submersible transformer vaults, manholes:

Since oil floats on water, there are two ways to clean up oils in manholes, storm drains and submersible transformer vaults. One way is to place absorbent pads (M&S #101201) or cloth on the oil and wait for it to accumulate. This works well in situations involving small quantities of oil and in cases where oil is trapped between storm drains. The second method is to vacuum or pump off both oil and water into a tank truck or 55 gallon drum. This is often required in the event that equipment in the vault is to be replaced. The water fraction of the vault may under certain limited circumstances be discharged to the storm sewer system. First, the oil fraction must be completely removed, and second, a laboratory analysis must be performed, reviewed and approved by Environmental Operations & Customer Support. This option will not be practical under emergency circumstances. Contractor assistance may be required for the use of a vacuum truck. The use of oil booms may be required and left in place following the cleanup if the possibility of further oil seepage exists. Some booms are available in Hicksville and may also be obtained from the cleanup contractor.

7.6.6 Spills under padmount transformer:

Oil trapped in the below grade vault area or pit of a padmount transformer should be pumped out and the remaining material stabilized and excavated to a point where either all evidence of oil is removed or just prior to the point where the transformer pad is in danger of being undermined. If the vault is a dirt bottom configuration, post clean up soil samples must be taken for PCB and non-PCB spills as directed in Section 7.5.4.

7.6.7 Spills on private vehicles:

CAUTION

At no time should vehicle owners be told to take their vehicles to a car wash until the spilled substance is proven to be non-PCB.

Every attempt should be made to retain any private vehicle involved in a spill of over 50 ppm PCB for cleaning. Cleaning involves thoroughly wiping down the affected surface of the vehicle using rags and the "oil cleaner" (M&S #00126053) or full strength "Windex". Do not use 1, 1, 1, Trichloroethane, it will dissolve the rubber gaskets on the vehicle and damage paint. Once a vehicle has been thoroughly wiped down, the owner should be instructed to call the Claims. All rags, gloves and other waste, solid or liquid material, shall be collected for disposal. Environmental Operations & Customer Support shall be contacted to determine the proper storage and transportation requirements. If the spill is non-PCB (e.g., less than 50 ppm PCB), the owner may be instructed to go to a car wash. If the spill is over 50 ppm PCB, the car will require sampling and analysis prior to release to the owner to verify that the PCB level is less than 10 ug/100 sq. cm.

If the owner is available, obtain their name, address and phone number, and forward to Claims.

If any private vehicles require cleaning and the owner is not available for notification, the vehicle shall be secured with barrier tape to prevent contamination of the public. The field supervisor is to then place a copy of the "Vehicle Absence Notification Letter" (FC-10127) either on the vehicle windshield or in the owner's mailbox. Check the version of the form to assure that the Claims phone number is 516-545-5353. If incorrect, cross-out the old number and write in the new (see **Exhibit 9.7**).

7.6.8 Spills on Company vehicles:

Spills on Company vehicles should be removed with rags and the "oil cleaner" (M&S #00126053) or full strength "Windex". In the event the entire vehicle needs cleaning and the spilled material has been confirmed by laboratory analysis to be less than 50 ppm PCB, after the spill area has been thoroughly wiped down, vehicles can then be washed at Company Transportation facilities. If the spilled material is 50 ppm or greater PCB, cleaning involves thoroughly wiping down the affected surface of the vehicle using rags and the "oil cleaner" (M&S #00126053) or full strength "Windex". Do not use 1, 1, 1, Trichloroethane, it will dissolve the rubber gaskets on the vehicle and damage paint. All rags, gloves and other waste, solid or liquid material, shall be collected for disposal. Environmental Operations & Customer Support shall be contacted to determine the proper storage and transportation requirements. The vehicle will require sampling and analysis prior to release to the use department to verify that the PCB level is less than 10 ug/100 sq. cm.

7.6.9 Spills on lakes, rivers, etc. or during rain storms:

Under these circumstances, the initial action is to control the source of the spill into the water by diking. Spillage on the water body should then be managed with oil absorbent material, preferably booms and pads. In those cases involving water bodies, an oil absorbent boom (which can be obtained from any Company power station) or a series of absorbent blankets (M&S #00101201) stretched across the lake or stream discharge will contain the spilled oil. In rainstorms, sometimes storm drains can be stuffed with absorbent pads or pieces of absorbent blanket in order to contain oil from traveling great distances. In any of the above cases, cleanup is difficult at best, however, every effort should be made to try to contain oil to the smallest possible area. The field supervisor or Environmental Operations & Customer Support representative will determine the need for contractor services for larger spills. In all cases, every effort should be made to eliminate any source of spillage into the water body before, during and after cleanup efforts.

7.6.10 Spills on hard surfaces, sidewalks and pavement:

PCBs spilled on a solid surface must be double washed/rinsed with an approved solvent. Each of the two washes requires a volume of fresh solvent sufficient to cover the contaminated area completely, combined with vigorous cleansing. The regulations specifically state that mere spreading of solvent over the surface or wiping with a solvent-soaked cloth is not sufficient.

A thin layer of speedi-dry should be placed on top of the affected area and allowed some time to soak up the spilled substance. Carefully work in the speedi-dry (oil-dry) then sweep up. Then the approved solvent can be poured on top of the surface and scrubbed with a street broom to a foamy

state. Allow a few minutes for the oil cleaner to work. Then apply speedi-dry again, work in, then sweep up. This will, in effect, clean the surface when the speedi-dry is vigorously worked into the pavement with a broom and the entire area is swept up. This process needs to be repeated at least once more, until the area is visibly clean. Speedi-dry should not be left behind. For non-PCB spills a single scrubbing with oil cleaner is usually sufficient. For spills where the oil was over 50 ppm PCB, the operation should be repeated three (3) times with follow-up sampling required. All equipment employed in the cleanup should be decontaminated if possible. The spill contaminated area will require sampling and analysis prior to release for public access to verify that the PCB level is less than 10 ug/100 sq. cm. All debris shall be removed from the site.

7.6.11 Spills on members of the public:

This is the most sensitive spill situation and it is imperative that it be correctly handled. Environmental Engineering and Compliance shall be contacted immediately. If possible, Environmental Engineering and Compliance personnel should provide instruction to the affected person(s) as to what actions to take. However, if the situation calls for immediate action, the following instructions should be given. The affected person(s) should be told to wash thoroughly as soon as possible. The person should be told to place all impacted clothing in a plastic bag until analysis of the spilled substance has been received. If non-PCB, then the person can simply wash their clothing (or be reimbursed and no further action is required). If the spilled substance is PCB, the person should be asked to turn over all contaminated clothing for proper disposal. The name, address and phone number of the individual should be obtained and forwarded to Claims. Response crew personnel should not try to explain the health effects of PCBs to members of the public. Instead, inquiries should be directed to Environmental Engineering and Compliance Department. In any event, EE&C should contact affected person(s) to answer any questions they might have.

7.7 Storage and Handling for Disposal

All activities for handling, transportation and storage of Hazardous waste, non-hazardous regulated waste and PCB waste shall be conducted in accordance with GO-10302 and GO-10284. Environmental Engineering and Compliance and Environmental Operations & Customer Support shall be contacted for specific guidance for non-routine wastes or suspected hazardous wastes.

7.7.1 Non-PCB, Non-hazardous Debris

Non-PCB debris can be disposed of by conventional methods (drums, spoils bin, roll-off, dumpster, etc.). Caution should be used in containing

and labeling gas equipment spills since condensate may be extremely flammable. Do not put PCB labels on non-PCB debris. Label or mark each container with the date and location of spill. Contact Environmental Operations & Customer Support in Hicksville for specific directions concerning disposal location and transportation.

7.7.2 Hazardous Debris

Hazardous waste contaminated debris, containers or equipment should be contained to stop any leakage. Debris and liquids shall be placed in drums, secured and labeled. The label shall be used in accordance with GO-10284 and each piece of equipment and/or drum shall be marked with the location of the spill and the date. Contact Environmental Operations & Customer Support in Hicksville for specific directions concerning disposal location and transportation.

7.7.3 PCB Debris

PCB equipment, liquids and debris should be labeled as such and placed in drip pans or plastic bags to prevent further leakage. PCB debris shall be placed in drums, secured and labeled. The PCB label (**Exhibit 9.2**) shall be used and each piece of equipment and/or drum shall be marked with the location of the spill and the date. Contact Environmental Operations & Customer Support in Hicksville for specific directions concerning disposal location and transportation.

8.0 RECORDS

8.1 Hazardous Waste Manifests - By law the generator copy of the eight page NYS Hazardous Waste Manifest document must be maintained by the generator (Environmental Engineering **and Compliance** Department) for five (5) years from the date the waste was accepted by the initial transporter (except for company vehicles used to move PCB units or debris from field sites to the nearest operations center on an emergency basis).

Company policy is to retain manifests, records and all related documentation for ten (10) years followed by microfilming for archiving.

Environmental Operations & Customer Support will maintain records of shipments into and out of Sub-storeroom Facilities to prevent exceeding of the 90 day storage limitations imposed at all locations other than the Hicksville Operations Center. Records should be retained on site for a period of five (5) years.

Individual generator organizations will maintain their own inventory records at each storage site and shall be responsible for ensuring the shipment of their wastes within the 90 day statutory period. See GO-10284 for further information.

8.2 NYS Annual Hazardous Waste Generators Reports - By law, copies of each Annual Report (prepared by the Environmental Engineering Department) must be retained for a minimum of five (5) years.

Company policy is to retain reports for ten (10) years followed by micro-filming for archiving.

8.3 Toxic Substances Control Act (TSCA) PCB Annual Report/PSC PCB Bi-Annual Report: PCB management and inventory reports are prepared by the Environmental Engineering Department. Reports are retained for a period of ten (10) years followed by microfilming for archiving.

9.0 EXHIBITS

9.1 **Non-PCB Label**

9.2 **PCB Label**

9.3 **Spill Notification Checklist**

9.4 **Spill Incident Report**

9.5 **PCB Spill Cleanup Performance Standards**

9.6 **Property Absence Notification Letter**

9.7 **Vehicle Absence Notification Letter**

9.8 **Spill Classification Chart**

10.0 APPENDICES

A. **New York State PCB Waste Codes**

B. **Spill Notification Flow Chart**

C. **Spill Notification Example Scenarios**

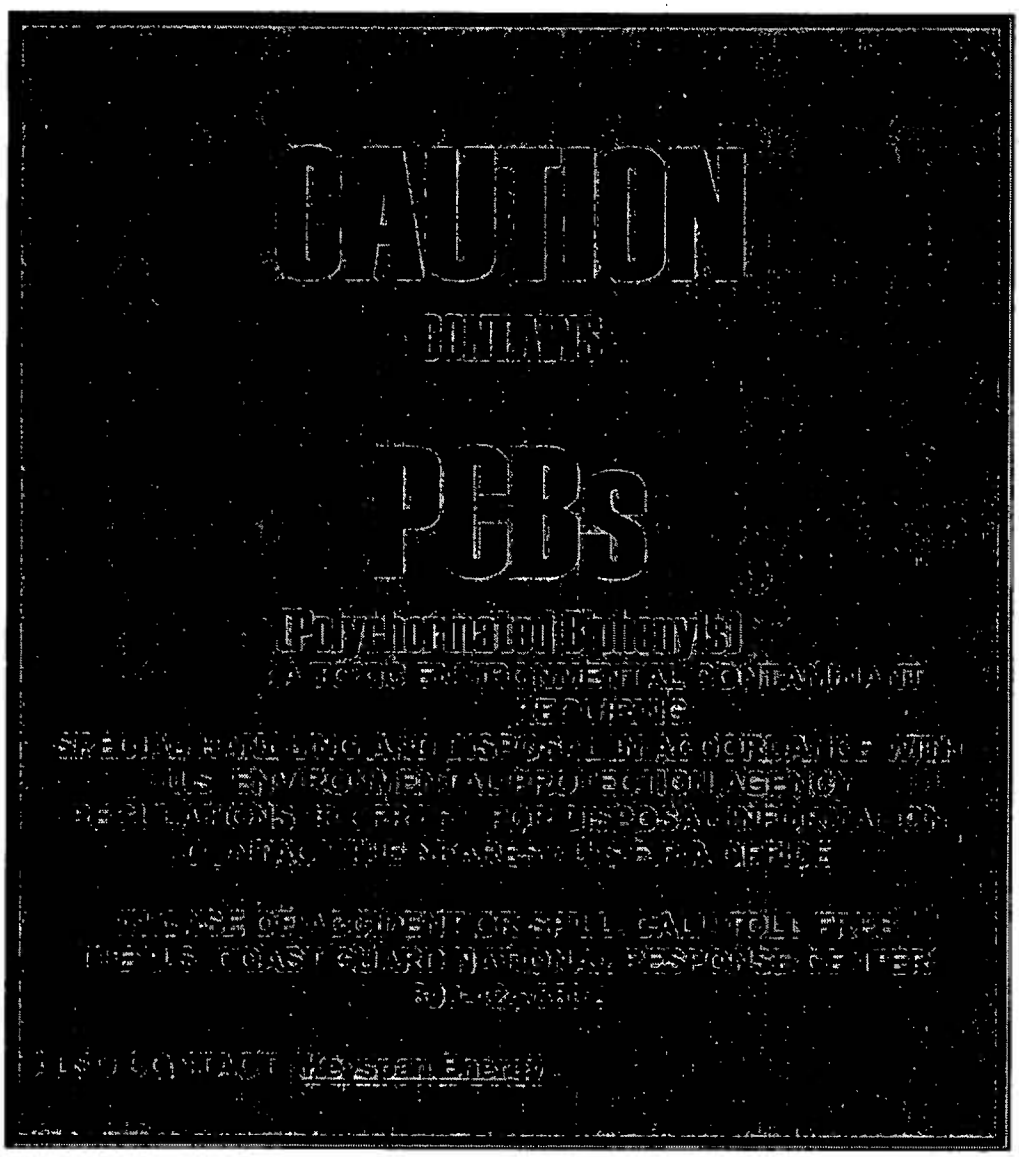
D. **OSHA 1910.120 Training**

NON PCB LABEL

NO PCBs

THE OIL CONTAINED WITHIN THIS CAPACITOR, TRANSFORMER OR CONTAINER, HAS BEEN TESTED AND PROVEN TO BE BELOW 50 PPM PCB. DO NOT RECYCLE OR REUSE WITH UNTESTED TRANFORMER OIL

PCB Label



Spill Notification Checklist

(To be used by SSO, ESO, GSO, CMS, SCC, or DCD for notifying Environmental Operations)

NOTE: Do not delay the call to Environmental Operations simply because some of the information may not be readily available. **This is essential to meet federal reporting requirements to the National Response Center.**

NOTIFICATION:

1. Caller's Name:_____
2. Recipient Name: _____

   Dept.:_____ Date:_____

   Location:_____ Time:_____

Person to be contacted for additional information:_____

SPILL INFORMATION:

1. Equipment Involved:_____
2. Type of Fluid:_____
3. Amount of Fluid:_____
4. Date:_____ Time:_____
5. Town:_____ Street:_____ X-Street:_____
6. Pole #:_____
7. Rear Property? Yes_____ No_____
8. Chlor-N-Oil Test: Positive:_____ Negative_____ Not Done:_____
9. Water Body Involved: Yes_____ No_____
10. Storm Drain Involved: Yes_____ No_____
11. Private Property Affected:_____
12. Lab Sample Taken: Yes_____ No_____
13. Sample & Label Number:_____
14. Cleanup Status/Need for Outside Assistance:_____
15. Spill Classification per SND Tab I _____I _____II _____III _____IV

OPTIONAL INFORMATION:

1. Equipment Information: Manufacturer:_____ Size:_____ Serial Number:_____
2. Line Section Referral:_____
3. Grid Number:_____

Spill Incident Report

Tracking Numbers
Internal #: ____ - ____
NYSDEC: ____
KSpan ☐
LIPA ☐ ____ - ____

SPILL INCIDENT REPORT

EPA ID# ____
Manifest # ____

Certification Statement
To the best of my knowledge this spill incident has been remediated in accordance with applicable regulations and all information documented in this record is accurate.

Signed: ____
Date: ____

Initial Notification Information

Received From:	Received By:
Name: ____	Name: ____
Ext: ____	Date: ____
Dept: ____	Time: ____
Loc: ____	Office: ____ Off-Duty: ____

Additional Information

CLOR-N-OIL	CLOR-N-SOIL
Pos ___	Pos ___
Neg ___	Neg ___
Not Done ___	Not Done ___

Non PCB Label? Yes ___ No ___
Water Body? Yes ___ No ___
Storm Drain? Yes ___ No ___

Motor Veh Acc? Yes ___ No ___
Private Property? Yes ___ No ___

Describe Damage: ____

For Accidents or Storm-Related Spills, promt Notifier to provide Charge Number

Charge No. ____

Spill Information
Trans Cap Fuel Haz Chem Other

Fluid Type ____ Amount Spilled ____
Date ____ Time ____

Location
Town ____
Street ____
X-Street ____
Rear Property Yes ___ No ___
Other Info: ____

Pole # ____
Path# ____
System Grid ____

Equipment Information
Manu ____
Size ____
Serial/Company # ____

Describe Spill and Origin / Cause

Cleanup
HazMat ___
Electric ___
Contractor ____
None Needed ___

Trade Winds 631-435-8900
MEG 631-369-4900

Spill Samples — **Post Cleanup / Redrum Samples**

Sample #	Result	Sample #	Result
Oil		Soil	
Soil		Wipe	
Veg			
Wipe			

Rev Date12/16/99

Spill Incident Report

Regulatory Notifications

National Response Center
800 - 424 - 8802
Date: _____ Time ____ Contact _____
Call for Class III or Class IV Spills
It is not necessary to wait for all information before calling the NRC.

New York State DEC
800 - 457 - 7362
or
(631) 444-0320 or (718) 482-4933 in NYC
Date: _____ Time ____ Contact _____
Call the DEC 800 number to obtain a Spill Reference Number

LIPA
333 Earle Ovington Blvd.
Suite 403
Uniondale, New York 11553

☐ AOG ☐ 3Party ☐ Storm

Suffolk County Health Dept Medical Examiners Office	Nassau County Health Dept.	Nassau County Fire Marshall	New York City DEP
(631) 853-5555 or between 11PM and 7 am Miles Quinn (631) 852-4814 All Spills in Suffolk County	(516) 571 - 3691 or after 5 PM (516) 742 - 6154 PCB, HazMat and Class II, III, IV	(516) 572 - 1092 If voice mail or no answer (516) 742 - 3170 All Spills in Nassau County	(718) 595 - 4681 or after 5 PM (718) - 595 - 6700 All Spills in Queens, Brooklyn or Staten Island
Date: _____	Date: _____	Date: _____	Date: _____
Time: ____	Time: ____	Time: ____	Time: ____
Contact: _____	Contact: _____	Contact: _____	Contact: _____

Comments, Other Contacts and Follow Up:

Claims:	Nassau 516-545-5353 Suffolk 631-348-4100

Hicksville TSDF (516) 545-5511 Pager: (516) 824-6666
(other numbers on pocket card)

Rev. Date 12/16/99

PCB Spill Cleanup Performance Standards

		Contaminated Soil				Solid Surfaces			
Mass of PCBs	Location	Visible Traces + 1ft. Lateral Buffer	50 ppm + Notice	25 ppm	10 ppm +10ppm Excavation	Double Rinse Wash	100 ug/ 100cm^2	100ug/ 100cm^2 + cap	10ug/ 100cm^2
Low Conc. 50-500ppm <270 gal.	Indoor Residential Areas								X
	All Other Areas	X				X			
	Electrical Substations		X	X			X		
	Restricted Access Areas Hi Contact Outdoors Lo Contact Indoor			X					X
All High Conc. Spills. >500 ppm and Low Conc. Spills >270 gallons	Lo Contact Indoor Non-impervious			X				X	X
	Lo Contact Outdoors			X			X		
	Non-Restricted Access Areas All Indoor Hi Contact Outdoors				X				X
	Vaults Indoor Lo contact Outdoors				X				X
	Lo Contact Outdoor Non-Impervious				X			X	X

Property Absence Notification Letter

Address of Incident _____

_____

Dear Customer:

On __/__/____ during your absence an accidental release of a substance from LIPA or KeySpan equipment impacted your property. By law we were required to promptly remediate the spill which involved the cleaning or removal of the affected areas. We apologize for the inconvenience this may cause you. Please be assured that your property will be restored. A representative from KeySpan's Claims Area will contact you to make arrangements.

Substance Spilled: ____ Transformer Oil ___ Non-PCB ___ Hydraulic Fluid ___ Other

___ PCB

Affected Area: _____ Grass/Soil _____Shrubs/Plants _____Vehicle ____ Other

Comments:

_____

_____

_____

_____

_____

If you have any environmentally related questions please contact KeySpan's Environmental Operations Department at 516-545-5511

If you have any questions pertaining to the restoration of your property please contact KeySpan's Claims Area at 516-545-5353 (Nassau/Queens County), 631-348-4100 (Suffolk County) or 718-403-3161 (Brooklyn/Staten Island

Signed : _____

Department: _____

Location: _____

Vehicle Absence Notification Letter

Date: _____

Location of Incident_____

Vehicle License Plate: _____

Dear Vehicle Owner:

During your absence, a substance was accidentally spilled on your vehicle which we are required by law to promptly remove. Since we were unable to locate you, we were obliged to clean this substance off your vehicle without prior notification to you.

Please accept the apologies of LIPA and KeySpan for any inconvenience or concern this may have caused you.

Substance Spilled: ____ Transformer Oil ___ Non-PCB ___ Hydraulic Fluid ___ Other
___ PCB

Comments:

_____
_____
_____
_____
_____

If you have any environmentally related questions please contact KeySpan's Environmental Operations Department at 516-545-5511

If you have any questions pertaining to the cleaning of your vehicle please contact KeySpan's Claims Area at 516-545-5353 (Nassau/Queens County), 631-348-4100 (Suffolk County) or 718-403-3161 (Brooklyn/Staten Island).

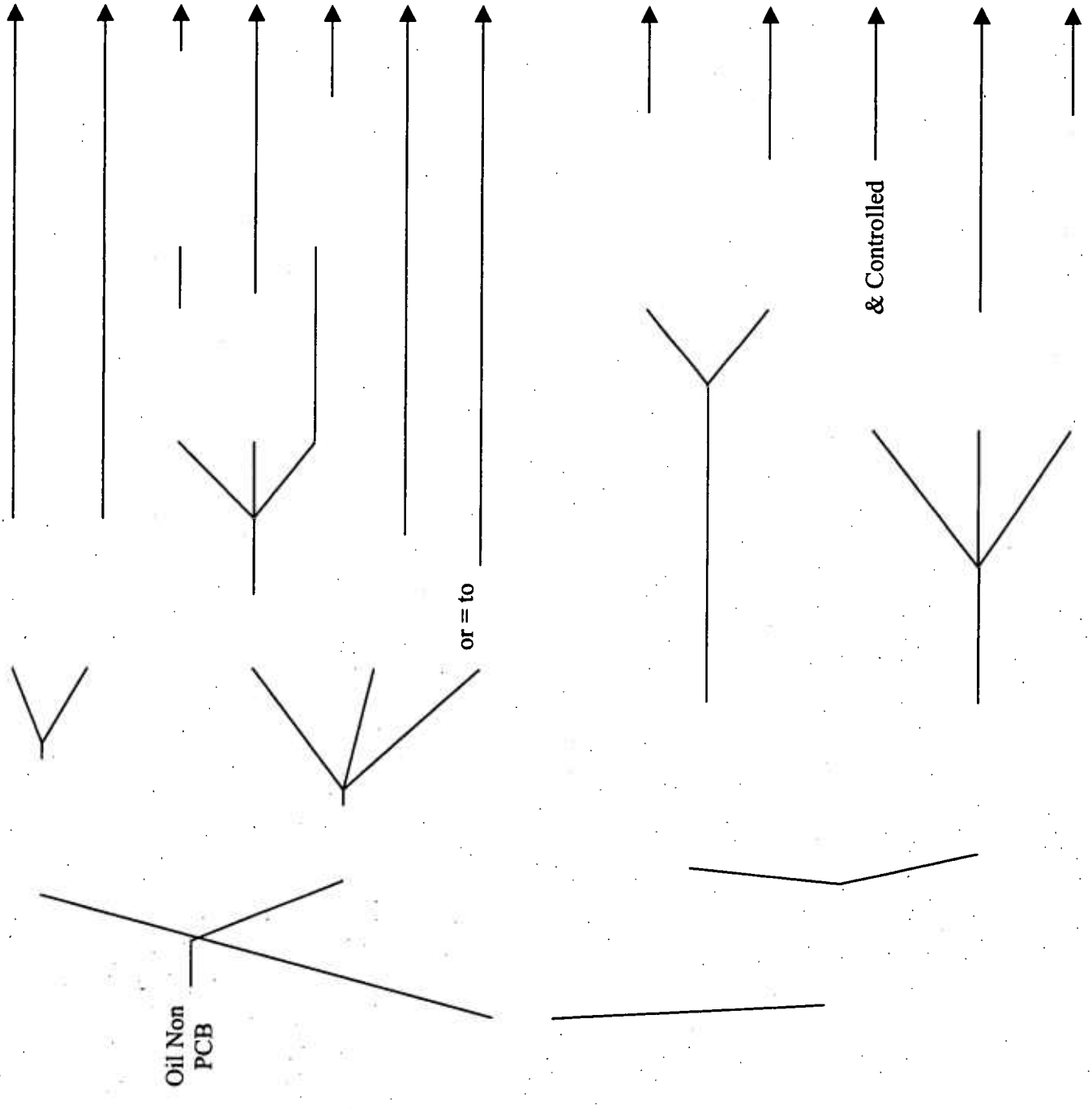
Signed : _____

Department: _____

Location: _____

	GENERAL OPERATIONS PROCEDURE	GO-10329 Rev. 2 Exhibit 9.8 Page 1 of 1

Spill Classification Chart



New York State PCB Waste Codes

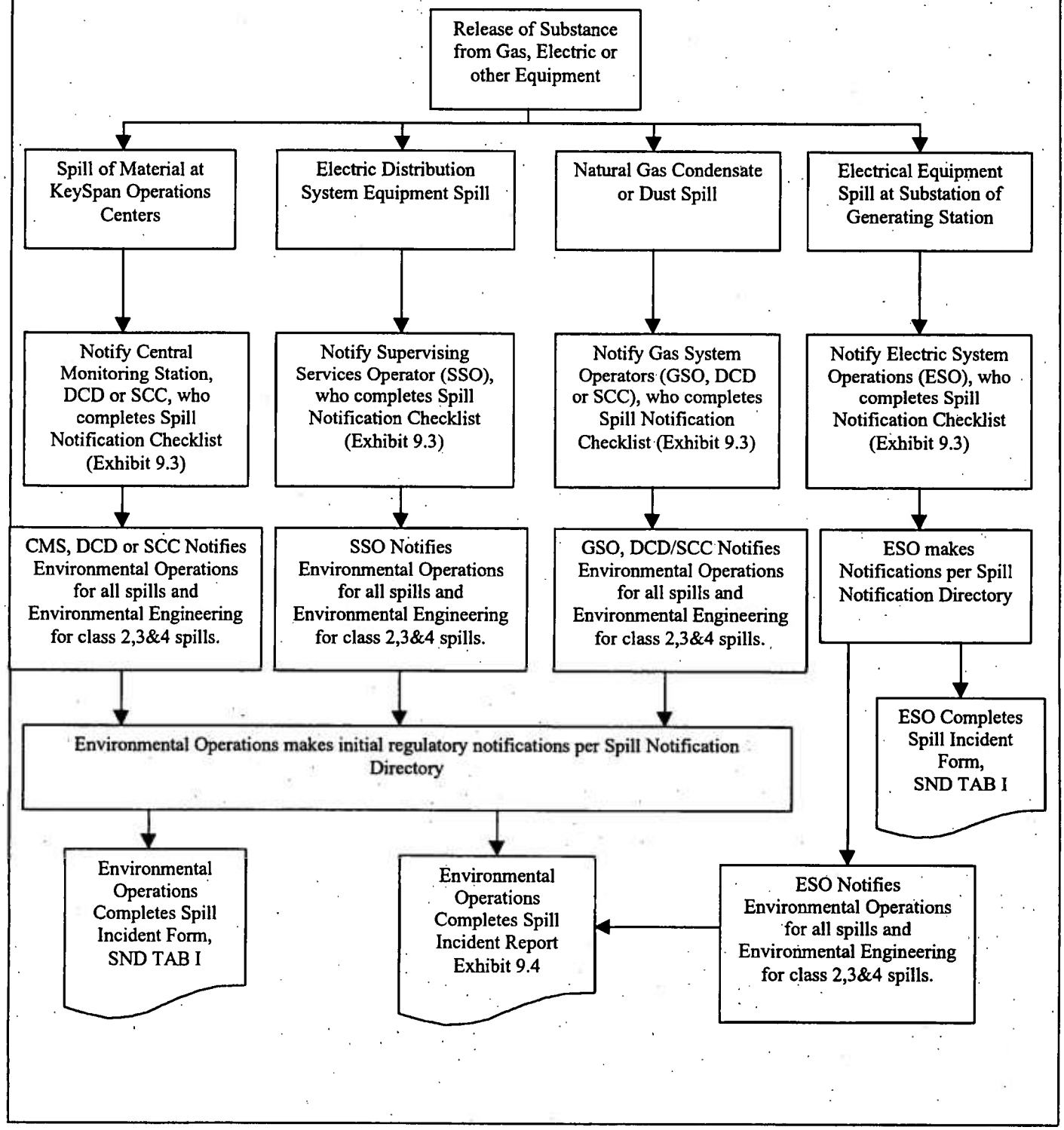
The following equipment and materials are identified as subject to the regulations and are applicable to this procedure under New York State 6NYCRR Part 371.4(E):

DEC Hazardous Waste Number	Waste Description
B001	PCB Oil (concentrated) from transformers, capacitors, etc.
B002	Petroleum oil or other liquid containing 50 ppm or greater of PCBs, but less than 500 ppm PCBs. This includes oil from electrical equipment whose PCB concentration is unknown, except for circuit breakers, reclosers, and cable
B003	Petroleum oil or other liquid (e.g., dielectric fluids) containing 500 ppm or greater PCBs.
B004	PCB Articles containing 50 ppm or greater of PCBs but less than 500 ppm PCBs, excluding small capacitors. This includes oil-filled electrical equipment whose PCB concentration is unknown, except for circuit breakers, reclosers, and cable
B005	PCB Articles, other than transformers, that contain 500 ppm or greater of PCBs, excluding small capacitors
B006	PCB Transformers. "PCB Transformers" means any transformer that contains 500 ppm PCB or greater.
B007	Other PCB Wastes including contaminated soil, solids, sludges, clothing, rags , and dredge materials.

- All newly purchased capacitors. (Since 1979, newly manufactured transformers and capacitors and capacitors contain non-PCB dielectric fluid)

The Company's non PCB label is depicted in **Exhibit 9.1**. This label is blue in color with black painting. It should be affixed to all equipment containing mineral oil with less than 50 ppm PCBs

Spill Notification Flow Chart



Spill Notification Example Scenarios

This procedure does not contain the actual telephone or pager numbers. This information in contained in the Spill Notification Directory (SND. These scenarios are some examples of what notifications would be made based on the assumed spill conditions. For the latest instructions the SND must be consulted.

1.0 Spill from the **Gas Transmission & Distribution System on Long Island.**

Spill is assumed to be approximately 2 gallons of potentially PCB contaminated condensate on the ground in Nassau County. The PCB concentration is initially unknown, but the spill is contained and controlled.

1.1 Person discovering spill notifies their immediate supervisor and the Gas System Operator (GSO).

1.2 GSO Pages only Environmental Operations based on the fact that GSO has categorized the spill as Class I. This is based on PCB Concentration Testing showing 1000ppm PCB and determination that this is less than a Reportable Quantity per Appendix A of the SND.

1.3 Environmental Operations makes internal and external Company notifications per the SND Tab XXXIII (New).

Notifications Include: Media Relations, Government Relations, NYSDEC Region 1, Nassau County Health Department, Nassau County Fire Marshall.

2.0 Spill from the **Gas Transmission & Distribution System in New York City**

Spill is assumed to be approximately 2 gallons of PCB contaminated oil on street in Brooklyn and has flowed down a storm sewer.

2.1 Person discovering spill notifies their immediate supervisor and the System Control Center (SCC) or Distribution Central Dispatching (DCD).

2.2 SCC or DCD pages Environmental Operations and Environmental Engineering based on the fact that the spill is categorized as a Class III spill.

2.3 Environmental Operations makes internal and external Company notifications per the Spill Notification Directory Tab XXXIII (New).

Notification Include: Emergency Preparedness, National Response Center, NYSDEC Region 2, Brooklyn Media Relations, Government Relations, New York City Department of Environmental Protection, NYC Fire Department.

3.0 Spill from the **Electric Distribution System**

Spill is assumed to be approximately 5 gallons of non-PCB distribution transformer oil. The spill is on the street in Suffolk County and is contained.

3.1 Person discovering spill notifies their immediate supervisor and the Supervising Services Operator (SSO).

3.2 SSO notifies only Environmental Operations based on the fact that the spill is categorized as a Class I spill.

3.3 Environmental Operations makes internal and external Company notifications per the SNP Tab XXI

Notification Include: NYSDEC Region 1, Suffolk County Department of Health Services

4.0 Spill at a **Company Operations Center in New York City**

Spill is approximately 5 gallons of Ethylene Glycol (anti-freeze) at the Greenpoint Operations Center. The spill in on the ground and contained.

4.1 Person discovering spill notifies their immediate supervisor and Distribution Central Dispatching (DCD).

4.2 DCD notifies only Environmental Operations based on the fact that the spill is categorized as a Class I spill. This classification is based on the fact that the 5 gallons is less than the Reportable Quantity per Appendix A of the SND.

4.3 Environmental Operations makes notifications per the SND Tab XVIII

Notification Include: BU Media Relations, NYSDEC, Region 2, NYC Department of Environmental Protection.

5.0 Spill at a **Company Operations Center on Long Island**

Spill is assumed to be 55 gallons of used motor oil in the Hicksville Yard on the blacktop parking lot. The spill is contained.

5.1 Person discovering spill notifies their immediate supervisor and the Central Monitoring Station (CMS)

5.2 CMS contacts only Environmental Operations based on the fact that the spill is categorized as a Class I spill.

5.3 Environmental Operations makes internal and external Company notifications per the SND Tab XVIII.

Notifications Include: Media Relations, Government Relations, NYSDEC Region 1, Nassau County Fire Marshal

6.0 Spill at an **Electric Substation**

Spill is assumed to be approximately 200 gallons of Non-PCB Transformer Oil. The spill is contained. However, the spill is at the Newbridge Road Substation and has attracted public and media attention.

6.1 Person discovering spill notifies their immediate supervisor and the Electric System Operator (ESO)

6.2 ESO notifies Environmental Operations and Environmental Engineering based on the spill categorized as a Class II.

6.3 ESO makes internal and external Company notifications per the SND Tab XVI.

Notifications Include: Media Relations, LIPA Media Relations, Government Relations, LIPA Management, Substation Maintenance Hicksville, Supervising Services Operator, Legal Department, NYSDEC Region 1, Nassau County Health Department, Nassau County Police, Nassau County Fire Marshall,

7.0 Spill at an **Electric Generating Facility** (Non-Fuel Oil)

Spill is assumed to be 20 Gallons of Hydrazine at the Port Jefferson Power Station. The spill is not contained and has entered Port Jefferson Harbor.

7.1 Person discovering spill notifies their immediate supervisor and the Electric System Operator (ESO)

7.2 ESO notifies Environmental Operations and Environmental Engineering based on the spill categorized as a Class IV. This classification is based on the fact that a quantity greater than the Reportable Quantity is outside the Site Boundary.

7.3 ESO makes internal and external Company notifications per the SND Tab V.

Notifications Include: Emergency Preparedness, National Response Center, Media Relations, LIPA Media Relations, Government Relations, LIPA Management, NYSDEC Region 1, Suffolk County Department of Health Services, Suffolk County Fire Marshall, Brookhaven Town Fire Marshall, Port Jefferson Village Hall, Legal Department, Claims.

OSHA 1910.120 Training Requirements

Hazardous Waste Cleanup Sites	
Staff	
Routine Site Employees	40 Hours Initial, 24 Hours Field, 8 Hours Annual Refresher
Routine Site Employees (minimal exposure)	24 hours initial, 8 hours field, 8 hours annual refresher
Non-routine site employees	24 hours initial, 8 hours field, 8 hours annual refresher
Supervisors or Managers of	
Routine Site Employees	40 hours initial, 24 hours field, 8 hours hazardous waste management, 8 hours annual refresher
Routine Site Employees (minimal exposure)	24 hours initial, 8 hours field, 8 hours hazardous waste management, 8 hours annual refresher
Non-routine site employees	24 hours initial, 8 hours field, 8 hours hazardous waste management, 8 hours annual refresher
Treatment, Storage, and Disposal Sites	
Staff	
General Site Employees	24 hour initial or equivalent, 8 hours annual refresher
Emergency Response Personnel	Trained to a level of competency, annual refresher
Note: See 29CFR1910.120 (e) and (p)(7)	
Other Emergency Response Staff	
Level 1 – First responder (awareness) level [1]	Sufficient training or proven experience in specific competencies, annual refresher
Level 2 – First responder (operations level)[2]	Level 1 Competency and 8 hours initial or proven experience in specific competencies, Annual refresher
Level 3 – Hazmat Technician [3]	24 hours or Level 2 and proven experience in specific competencies, Annual refresher
Level 4 – Hazmat Specialist [4]	24 hours and Level 3 and proven experience in specific competencies, Annual refresher
Level 5 – On-the –Scene Incident Commander [5]	24 hours of Level 2 and additional competencies, Annual refresher
Note: See 29CFR1910.120 (q) (6)	

[1] *Witnesses* or *discovers* a release of hazardous materials and who are trained to notify the proper authorities
[2] Responds to releases of hazardous substances in a defense manner, without trying to stop the release.
[3] Responds aggressively to stop the release of hazardous substances.
[4] Responds with and in support to Hazmat technicians, but who have specific knowledge of various hazardous substances.
[5] Assumes control of the incident scene beyond the first responder awareness level.

Note: These training requirements are associated with emergency response to hazardous materials incidents. The applicability of training requirements to specific facility staff should be verified through Corporate Safety or Environmental engineering & Compliance.

OSHA 1910.120 Hazwoper Training
Emergency Response Activities

29 CFR 1910.120(q)(6) addresses the OSHA training requirements associated with emergency response to hazardous substance releases, and Disposal Facility (TSDF) site activities. The OSHA training requirements are based on the duties of, or functions served by, each responder in an emergency response organization.
The applicability of the OSHA training requirements to specific job functions or the determination of what conditions constitute an emergency response under OSHA, should be determined with the assistance of Corporate Safety Services Department of Environmental Engineering & Compliance Department.
The specific OSHA training requirements of 29 CFR 1910.120(q)(6) 1999 are provided below:

(q)(6) Training. Training shall be based on the duties and function to be performed by each responder of an emergency response organization. The skill and knowledge levels required for all new responders, those hired after the effective date of this standard, shall be conveyed to them through training before they are permitted to take part in actual emergency operations on an incident. Employees who participate, or are expected to participate, in emergency response, shall be given training in accordance with the following paragraphs:

(q)(6) (i) First responder awareness level. First responders at the awareness level are individuals who are likely to witness or discover a hazardous substance release and who have been trained to initiate an emergency response sequence by notifying the proper authorities of the release. They would take no further action beyond notifying the authorities of the release. First responders at the awareness level shall have sufficient training or have had sufficient experience to objectively 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 the role of the first responder awareness
- individual in the employer's emergency response plan including site
- security and control and the U.S. Department of Transportation's
- Emergency Response Guidebook.
- The ability to realize the need for additional resources, and to
- make appropriate notifications to the communication center.

(q)(6) (ii) First responder operations level. First responders at the operations level are individuals who respond to releases or potential releases of hazardous substances as part of the initial response to the site for the purpose of protecting nearby persons, property, or the environment from the effects of the release. They are trained to respond in a defensive fashion without actually trying to stop the release. Their function is to contain the release from a safe distance, keep it from spreading, and prevent exposures. First responders at the operational level shall have received at least eight hours of training or have had sufficient experience to objectively demonstrate competency in the following areas in addition to those listed for the awareness level and the employer shall so certify:

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

(q)(6) (iii) Hazardous materials technician. Hazardous materials technicians are individuals who respond to releases or potential releases for the purpose of stopping the release. They assume a more aggressive role than a first responder at the operations level in that they will approach the point of release in order to plug, patch or otherwise stop the release of a hazardous substance. Hazardous materials technicians shall have received at least 24 hours of training equal to the first responder operations level and in addition have competency in the following areas and the employer shall so certify:

- Know how to implement the employer's emergency response plan.
- Know the classification, identification and verification of known and unknown materials by using field survey instruments and equipment.

- Be able to function within an assigned role in the Incident Command System.
- Know how to select and use proper specialized chemical personal protective equipment provided to the hazardous materials technician.
- Understand hazard and risk assessment techniques.
- Be able to perform advance control, containment, and/or confinement operations within the capabilities of the resources and personal protective equipment available with the unit.
- Understand and implement decontamination procedures.
- Understand termination procedures.
- Understand basic chemical and toxicological terminology and behavior.

(q)(6) (iv) **Hazardous materials specialist**. Hazardous materials specialists are individuals who respond with and provide support to hazardous materials technicians. Their duties parallel those of the hazardous materials technician, however, those duties require a more directed or specific knowledge of the various substances they may be called upon to contain. The hazardous materials specialist would also act as the site liaison with Federal, state, local and other government authorities in regards to site activities. Hazardous materials specialists shall have received at least 24 hours of training equal to the technician level and in addition have competency in the following areas and the employer shall so certify:

- Know how to implement the local emergency response plan.
- Understand classification, identification and verification of known and unknown materials by using advanced survey instruments and equipment.
- Know of the state emergency response plan.
- Be able to select and use proper specialized chemical personal protective equipment provided to the hazardous materials specialist.
- Understand in-depth hazard and risk techniques.
- Be able to perform specialized control, containment, and/or confinement operations within the capabilities of the resources and personal protective equipment available.
- Be able to determine and implement decontamination procedures.
- Have the ability to develop a site safety and control plan.
- Understand chemical, radiological and toxicological terminology and behavior.

(q)(6) (v) **On scene incident commander**. Incident commanders, who will assume control of the incident scene beyond the first responder awareness level, shall receive at least 24 hours of training equal to the first responder operations level and in addition have competency in the following areas and the employer shall so certify:

- Know and be able to implement the employer's incident command system.
- Know how to implement the employer's emergency response plan.
- Know and understand the hazards and risks associated with employees working in chemical protective clothing.
- Know how to implement the local emergency response plan.
- Know of the state emergency response plan and of the Federal
- Regional Response Team.
- Know and understand the importance of decontamination procedures.

(q)(7) **Trainers**. Trainers who teach any of the above training subjects shall have satisfactorily completed a training course for teaching the subjects they are expected to teach, such as the courses offered by the U.S. National Fire Academy, or they shall have the training and/or academic credentials and instructional experience necessary to demonstrate competent instructional skills and a good command of the subject matter of the courses they are to teach.

(q)(8) **Refresher training**. (i) Those employees who are trained in accordance with paragraph (q)(6) of this section

shall receive annual refresher training of sufficient content and duration to maintain their competencies, or shall demonstrate competency in those areas at least yearly. (ii) A statement shall be made of the training or competency, and if a statement of competency is made, the employer shall keep a record of the methodology used to demonstrate competency.

J Highway Work Permit Application Cover Letters

LIPA

Transmittal

To: Gene Smith – NYS DOT

From: Lou Donofrio—LIPA Project Management

CC:

Date: 12/08/2005

Re: Rt 135 Drawings – LIPA's 345kV Underground Electric Cable

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These drawings show the access control line.

Attached are the following:

1. **Ten sets of 8 Drawings** :

   - F-81379, F-81378, F-81348, F-81349, F-81350, F-81351, F81352 and F-81353

These drawings include the access control lines and supplemental request from Mr. Steve Lauer as it relates to the proposed installation of LIPA's 345kV underground cable. and requested to LIPA's Substation and Transmission Engineering Manager, Mr. Gary Petschauer P. E.

LIPA

Transmittal

To: Gene Smith – NYS DOT

From: Lou Donofrio—LIPA Project Management

CC:

Date: 11/09/2005

Re: RT 135 Permit

Attached are the following:

1. **Six sets of 11 Drawings :**
   - F-81348, F-81349, F-81350, F-81351, F-81352, F-81353, F-81354, F-81376, F-81377, F-81378 and F-81379.
2. **Six sets of a written description of NYS Rte 135 cable installation and associated access roads.**
3. **Three sets of NYS permit application including:**
   - NYS Highway Work Permit Application for Utility Work. (PERM 32m (2/00))
   - Major Construction Inspection Requirements Agreement with Permittee for Highway Work Permits.
   - Undertaking (Public Utilities) in Connection with Highway Work Permits issued by NYS Dept of Transportation. (PERM 2(09/05))

CC. Mr. Michael Mariotti

LIPA

Transmittal

To: Gene Smith – NYS DOT

From: Lou Donofrio—LIPA Project Management

CC:

Date: 12/09/2005

Re: Permit – as per attached

These drawings show all state roads accept Rt. 135.

Attached are the following:

1. **Six sets of 7 Drawings :**
   - F-80169, F-80170, F-80145, F-80146, F-81336, F-81345, F81368

2. **Three sets of NYS permit application including:**
   - NYS Highway Work Permit Application for Utility Work. (PERM 32m (2/00))
   - Major Construction Inspection Requirements Agreement with Permittee for Highway Work Permits.
   - Undertaking (Public Utilities) in Connection with Highway Work Permits issued by NYS Dept of Transportation. (PERM 2(09/05))

CC. Mr. Michael Mariotti

TABLE OF CONTENTS

1.0 PURPOSE

1.1 To provide instructions (i.e., reporting, clean-up, response, disposal) to management to address:

- oil spills from the electric distribution system,
- oil spills from electrical equipment at generating stations and substations and,
- releases of fluids or powders (dust) from equipment or piping within the gas transmission and distribution system.

1.2 To provide specific directions for responding to spills which contain PCBs and spills where the PCB content is unknown.

1.3 To provide instructions for responding to other hazardous or non-hazardous spills from Company operations in the New York Area.

2.0 SCOPE

2.1 This procedure documents the responsibilities and required actions related to notification, reporting, worker protection, sampling, remediation and proper handling of waste product and debris of the following:

- Spills of mineral oil or dielectric fluid from;
  - a) electrical equipment within a substation or generating station and/or,
  - b) equipment which is part of the electrical distribution system.
- Spills or releases of any fluids or dust (powders) from any portion of the gas transmission or distribution system, and
- Spills or releases of other non-hazardous or hazardous materials or wastes occurring during Company operations, including transportation related incidents.

2.2 This procedure does not cover spills associated with the LIPA-CL&P 138kV Submarine Cable under Long Island Sound. Such Spills are addressed by a separate procedure (see section 4.5.12).

2.3 This procedure does not cover spills of #2 fuel oil or #6 fuel oil at generating stations. These spills are addressed in the Spill Prevention, Control and Counter-measure plans (SPCC) developed for each location, the Spill Notification Directory (SND) and the Oil Spill Contingency Plan.

2.4 This procedure does not cover spills and/or releases of asbestos or asbestos containing materials

3.0 POLICY

3.1 General Requirements

3.1.1 This procedure has been designated as a Corporate Procedure.

3.1.2 This procedure supercedes BU Distribution SOP/Environmental Guideline 12-1 and LILCO General Operating Procedure 10329 Rev. 1

3.1.3 Outside notifications are required. See Section 7.3.

3.1.4 The actions detailed in this procedure are responsive to various federal, state and local regulations. See Section 4.0.

3.1.5 This procedure shall be reviewed annually with all field and supervisory personnel responsible for its implementation to ensure familiarity with all procedure steps, and material to be handled. See Section 6.0.

3.1.6 This procedure shall be reviewed, and revised as necessary at least every three (3) years.

3.1.7 The Lead Organization for the procedure is the Environmental Engineering and Compliance Department.

3.2 Company Policy

3.2.1 The Company's Environmental Policies are described in Reference 4.5.1

3.2.2 Regulatory Compliance

Company operations involving the handling of spills that contain or may contain PCBs, hazardous or non-hazardous regulated materials or waste shall comply with all applicable federal, state and local regulations. See Section 4.0.

3.2.2 Employee Compliance Responsibility

All Company management employees shall ensure that they and all involved employees working under their supervision are familiar with and comply with Company policies and procedures concerning handling of spills which contain or may contain PCBs or other hazardous or non-hazardous regulated materials.

All employees and their supervisors who participate in emergency response operations for releases of, or substantial threats of releases of, OSHA hazardous substances and/or are involved in Hazardous Waste Treatment, Storage and Disposal Facility (TSDF) operations; both of which may subject the employee to exposure or the reasonable possibility for employee exposure to safety or health hazards; must be trained in accordance with OSHA Hazardous Waste Operations and Emergency Response Requirements (29 CFR 1910.120).

4.0 REFERENCES

The laws, regulations and related Company procedures referenced by this document are noted below.

4.1 Federal Regulations & Laws

4.1.1 Resource Conservation and Recovery Act (RCRA)

4.1.2 Toxic Substances Control Act (TSCA) of 1976 and its implementing regulations:

4.1.2.1 40CFR116 – Designation of Hazardous Substances,

4.1.2.2 40CFR117 – Determination of Reportable Quantities for Hazardous Substances,

4.1.2.3 40CFR302 – Designation, Reportable Quantities, and Notification,

4.1.2.4 40CFR 761 – Polychlorinated Biphenyl (PCB) Manufacturing, Processing, Distribution in Commerce and use Prohibitions.

4.1.3 Federal Water Pollution Control Act of 1972

4.1.4 Department of Transportation Hazardous Materials Regulations

4.1.5 Occupational Safety and Health Act, and its implementing regulations:

4.1.5.1 29CFR1910.120, Hazardous Waste Operations and Emergency Response

4.1.5.2 29CFR1910.1200, Hazard Communication

4.2 New York State

4.2.1 NYS Hazardous Waste Regulations, 6 NYCRR 370 Series

4.2.2 NYS Solid Waste Regulations, 6 NYCRR 360 Series

4.2.3 Public Service Commission, PCB Inventory Reports, 16 NYCRR Part 730

4.2.4 Article 12 of the Navigation Law, State Environmental Conservation Law

4.3 New York City

4.3.1 Administrative Code, Title 16 Sanitation

4.3.2 Administrative Code, Title 24 Environmental Protection and Utilities

4.3.3 Rules, Title 3 Fire Department, Chapter 7 Bulk Oil Storage

4.3.4 Rules, Title 15 Department of Environmental Protection

4.3.5 Rules, Title 16 Sanitation

4.4 Nassau and Suffolk Counties

4.4.1 Nassau County Public Health Ordinance, Article XI, Toxic and Hazardous Materials Storage, Handling and Control

4.4.2 Nassau County Fire Prevention Ordinance, Article III

4.4.3 Suffolk County Sanitary Code, Article XII, Toxic and Hazardous Materials Storage and Handling Controls

4.5 Applicable Company Procedures

4.5.1 GO-96, Environmental Policy and General Compliance Procedure

4.5.2 GO-10284, Procedure for Management of Hazardous Wastes

4.5.3 GO- 10312 Asbestos Management Procedure

4.5.4 GO-10302, Procedure for Management of Non-hazardous Regulated Wastes

4.5.5 GO-10326, Hazard Communication Program including Procurement and Handling of Hazardous Materials

4.5.6 WM-11006, Handling Mercury Spills in a Customer's House

4.5.7 WM-12005, Handling Gas Meters, Regulators and Meter Headers Laden with Oil

4.5.8 WM-15006, Handling Gas Equipment Subjected to Powder Conditions

4.5.9 Spill Notification Directory

4.5.10 Gas System Operator, "Emergency Notification Procedures" (e.g., Gas Emergency Plan or facility specific notification procedures.)

4.5.11 NYS DEC/HWMF Part 373 Permit Application (two volumes, Company Binders, Environmental Engineering Dept.)

4.5.12 LIPA-CL&P 138kV Submarine Cable Dielectric Fluid Leak Contingency Implementing Procedures Manual

4.5.13 Distribution SOP/Environmental Guideline 12-3 Handling of Low Pressure Drip Liquids

5.0 DEFINITIONS

5.1 The definitions of terms used throughout this procedure are listed for uniformity and consistency with government regulations.

5.2 Terms

DEC (also NYSDEC) - The New York State Department of Environmental Conservation.

DISPOSAL - The discharge, deposit, injection, dumping, spilling, leaking, or placing of any solid waste including PCB waste, into or on any land or water, so that such waste or any constituent thereof may enter the environment, or be emitted to the air, or discharged to any waters, including groundwater, of the State of New York (6 NYCRR 370.2(b)(43)).

DOT - The United States Department of Transportation.

ECL or ENVIRONMENTAL CONSERVATION LAW - Chapter 43-B of the Consolidated Laws of New York State, entitled the Environmental Conservation Law (6 NYCRR 370.2(b)(47)).

EPA (also USEPA) - The United States Environmental Protection Agency.

GENERATOR - Any person, by site, whose act or process produces hazardous waste as defined in 6 NYCRR Part 371 or whose act first causes a hazardous waste to become subject to regulation (6 NYCRR 370.2(b)(75)).

HAZARDOUS WASTE - Any solid or liquid waste defined in 40 CFR Part 261 and 6 NYCRR Part 371 (6 NYCRR 370.2 (b) (78)). PCBs are defined as a hazardous waste in the State of New York. Petroleum products that present or may present a threat to the quality of the drinking water supply or a hazard to human health are defined as a hazardous waste in the counties of Nassau and Suffolk. Refer to GO-10284 for additional information.

LABEL - A proper DOT shipping label as described in 49 CFR Part 172.

MANIFEST - An approved hazardous waste manifest as defined in 6 NYCRR Part 372.

MARKING - Any label, writing or other marking used to identify the contents of hazardous waste containers.

NOTIFICATIONS - Spill incident reporting as required in the Company's Spill Notification Directory. Requires internal notifications (i.e., SSO, GSO, Claims, Media, etc.) and external notifications (i.e., regulatory agencies, police, fire and rescue, etc.).

NEW YORK STATE PART 373 PERMIT - Issued by NYSDEC to operate a hazardous waste management facility in accordance with 6 NYCRR Parts 370 through 373.

PCB - Polychlorinated Biphenyl, the chemical name of a dielectric fluid marketed under various trade names. The following are regulatory classifications of PCB:

- **Non-PCB** - Equipment or material, liquid or solid, which contains less than 50 ppm PCB.
- **PCB Contaminated** - Equipment or material, liquid or solid, which contains 50 ppm or greater PCB, but less than 500 ppm PCB. Equipment or material, liquid or solid, with unknown concentrations of PCB shall be assumed to be PCB contaminated.
- **PCB** - Equipment or material, liquid or solid, which contains 500 ppm or greater PCB.

POSING AN EXPOSURE RISK TO FOOD AND FEED ESTABLISHMENTS

PCB equipment "posing an exposure risk" means being in any location where human food or animal feed products could be reasonably exposed to PCBs released from PCB equipment. EPA considers human food and animal feed to include items regulated by the U.S. Department of Agriculture or the Food and Drug Administration. Special procedures and regulations regarding spills apply in this case. Food and feed used or stored in private homes is excluded.

SMALL QUANTITY GENERATOR - a generator who generates less than 1000 kilograms of **non-acute hazardous waste** in a month and who stores less than 1000 kilograms of this waste at any one time; or a generator who generates less than one kilogram of **acute hazardous waste** in a month and stores less than one kilogram of this waste at a time (6 NYCRR 370.2(b)(154)).

NON-ACUTE HAZARDOUS WASTE - Any Hazardous waste defined in 6 NYCRR 371 except those designated as acute hazardous waste.

ACUTE HAZARDOUS WASTE - Any waste listed in 6 NYCRR, Section 371.4(d)(5) and any waste listed in Section 371(b) and 3714(c) with "H" Hazard Code (6 NYCRR 370.2(b)(6)).

NOTE

The Company does not typically generate "acute hazardous waste".

SOLID WASTE - Material defined as a solid waste in 6 NYCRR 371.1(c), including garbage refuse, sludge and other waste material. "Other solid waste" is any solid, liquid, semisolid or contained gaseous material resulting from industrial operations which is discarded or being accumulated/stored prior to being discarded. Generally, all materials used by the Company which are destined for disposal or recycling are considered solid waste.

SPILL - Any discharge or escape of material from the ordinary containers employed in the normal course of storage, transfer, processing or use (Nassau County Health Department Article XI).

SPILL CLASSIFICATIONS

Class I A Class I spill meets all the following requirements:

- Small quantity (e.g., less than 100 gallons of oil)
- Fully contained on-land either within existing secondary containment structure, within dike constructed in response to the particular event or immobilized on ground surface.
- No discharge to navigable water or storm drain.
- Material spilled is not a flammable liquid* or combustible liquid*

*NOTE A flammable liquid is a liquid with a flash point less than 100°F. A combustible liquid is a liquid with a flash point between 100°F and 200°F. (See Table 1 for typical flash points.)

Class II A Class II spill meets any of the following criteria:

- Large quantity (e.g., greater than 100 gallons of oil but less than 1000 gallons), or
- Containment of spill is questionable, or
- Material spilled is a flammable or combustible liquid (i.e., flash point less that 200°F - refer to Table 1 for typical flash points) and there is no discharge to navigable water

Class III A Class III spill meets the following criterion:

- Discharge of a small amount oil (e.g., 10 gallons or less) into navigable water occurs or is imminent.

Class IV A Class IV spill meets either of the following requirements:

- Discharge of significant amount of oil (i.e., greater than 10 gallons) into navigable water, or

- An on-land spill which threatens to significantly impact the environment (e.g., greater that 1000 gallons on-land, or a spill which materially affects private property)

Exhibit 9.8, Spill Classification Chart may be used to assist in classifying a spill.

STORAGE - The temporary containment of any hazardous waste, in such a manner as not to constitute disposal of such hazardous waste (6 NYCRR 370.2(b)(178)).

TRANSFORMER - Company transformers are mineral oil filled and may contain a very low level of PCB or none at all. There are three classes of transformers as defined by regulation and therefore are applicable to this Procedure.

1. **Non-PCB Transformer**: Transformers known to contain less than 50 ppm PCB in the dielectric oil. No transformer can be classified as non-PCB unless the dielectric fluid has been tested by laboratory analysis and found to contain less than 50 ppm PCB or the manufacturer's nameplate indicates the PCB level to be less than 50 ppm PCB. Dielectric fluid found to be non-PCB has only one disposal restriction; it cannot be used as a dust control agent. Non-PCB transformers have no servicing or storage restrictions. All transformers tested and determined to be non-PCB and all

incoming new transformers (since 1979) will be conspicuously labeled "No PCBs". See **Exhibit 9.1**.

2. **PCB Contaminated Transformer**: Transformers **with** a dielectric oil which contain 50 ppm or greater PCB but less than 500 ppm PCB. All mineral oil transformers (i.e., those purchased by the Company prior to 1979) with unknown concentrations of PCB must be assumed to be PCB contaminated unless tested and found to contain less than 50 ppm PCB or 500 ppm or greater PCB. There are no servicing restrictions or labeling requirements on existing inservice PCB contaminated transformers. A drained "PCB contaminated" transformer tank has no storage or disposal restrictions. PCB contaminated dielectric fluids must be disposed in either a licensed high efficiency boiler, an approved chemical waste landfill for solids (in bulk or in drums and stabilized with absorbent material) or in a high temperature incinerator specifically licensed for PCB destruction.
3. **PCB Transformer**: Transformers containing 500 ppm or greater PCB in the dielectric oil. The Company does not own any transformers which were designed to contain PCBs. If a transformer is found that contains 500 ppm or greater PCB, it is removed from service as soon as possible. Transformers fall into this category either by collecting a mineral oil sample and subsequent laboratory analysis or from other information available to the owner (e.g., nameplate). Any servicing that requires the removal of the core and coils from the tank is prohibited. PCB dielectric fluid must be disposed of in a permitted high efficiency incinerator. PCB transformer tanks which have been drained and properly rinsed can be disposed of in either a permitted chemical waste landfill or incinerator. These transformers will be labeled with a PCB label as shown in **Exhibit 9.2**.

TRANSPORTER - A person engaged in the off-site transportation of hazardous waste by air, rail, highway or water (6 NYCRR 370.2(b)(173)).

TREATMENT - Any method, technique, or process, including neutralization, designed to change the physical, chemical or biological character or composition of any hazardous waste to:

(i) neutralize such waste;

(ii) recover energy or material resources from the waste; or

(iii) render such waste:

(a) non-hazardous or less hazardous;

(b) safer to transport, store, or dispose of;

(c) amendable for recovery, or storage; or

(d) reduced in volume.

TREATMENT, STORAGE OR DISPOSAL FACILITY (TSDF) - A facility that is utilized to treat, store or dispose of hazardous waste and has obtained all necessary permits and approvals to operate as such. Only the Hicksville Operations Center has been designated as a TSDF and is the only Company facility permitted to store hazardous waste in excess of 90 days. No disposal activities take place at Hicksville.

WASTE GENERATING ORGANIZATION - Means any Company organization which produces a hazardous, non-hazardous or PCB waste or manages PCB equipment and materials which could result in a reportable spill.

6.0 RESPONSIBILITIES

6.1 Waste Generating Organizations, including but not limited to:

- Electric Design and Construction Department,
- Electric Service Department,
- Electric System Operations Department,
- Electric Production Department,
- Gas System Operations Department (NY),
- Gas Central Operations Department (NY),
- Gas Field Operations (NY),
- Gas Construction, Maintenance & Services Departments (LI),
- Gas System Operations Department (LI),
- Purchasing and Materials Management,
- Facilities Management Department,
- Maintenance Services Department,
- Fleet Services Department,
- Division of Staffing & Development
- T&D Project Management

NOTE

Departments, which employ contractors to supply services that may result in a spill, are responsible to see that contractor personnel meet the notification requirements of this procedure. See Section 6.17 for additional details regarding contractor requirements.

shall be responsible to;

6.1.1 With administrative assistance from Environmental Engineering and Compliance Department, or from Environmental Operations each organization shall:

- budget for spill response services, if required,
- issue a requisition for these services under the common corporate purchase order through the Accounting, Materials, Purchasing System (AMPS) (purchase order established for T&D emergency spill response),
- issue releases against the purchase order through AMPS, and
- process invoices for payment through AMPS.

6.1.2 Each waste generator organization shall advise Environmental Engineering and Compliance Department of any special requirements associated with their preparation of requisitions for emergency response services.

6.1.3 Waste generator organizations who elect to initiate emergency spill response services independently (without the assistance of Environmental Operations & Customer Support Department) shall provide to Environmental Operations & Customer Support Department a specific contact or equivalent means to initiate an emergency spill response within a maximum of two hours of the initial notification.

6.1.4 Ensure all applicable personnel receive sufficient training:

6.1.4.1 On PCBs, hazardous and non-hazardous materials/waste that the department uses or generates,

6.1.4.2 On spill cleanup consistent with the necessary level of response in accordance with 29 CFR 1910.120, where applicable and 29 CFR 1910.1200. See Section 10, Appendix D - OSHA 1910.120 Training,

6.1.4.3 Assistance may be requested from the Division of Staffing & Development Corporate Safety Services Division, or the Environmental Engineering and Compliance Department, and

6.1.4.4 With the assistance of the Division of Staffing & Development, ensure records of employee training are maintained and certifications associated with this training are available at generating sites (Operations Centers, Power Stations, etc.).

CAUTION

Spills must be reported to the DCD, (or SCC),SSO (or GSO), ESO, Environmental Operations & Customer Support Department, and to outside regulatory agencies within two hours of their occurrence or discovery. The notification must be made person to person (messages left on telephone answering devices are not acceptable).

*Environmental Engineering & Compliance Department is to be notified for Class 2,3 & 4 spills (**see Exhibit 9.8**)only per the Spill Notification Directory*

6.1.5 When a spill is observed, conduct initial defensive measures to secure the spill location to prevent, where possible, the spilled material from spreading and to minimize the potential contact by the public or other workers.

6.1.5.1 The extent of the area affected shall be immediately determined for all spills. These areas shall be adequately protected (e.g., barrier tape, traffic cones, etc.) to prevent unknowing entry by the employees, the public or residents. Personal property (e.g., vehicles, etc.) shall also be treated in this manner.

6.1.5.2 Personnel discovering an unknown spill shall treat the spill as a hazardous material spill until information of the source of the material has been ascertained or testing has indicated its hazard class.

6.1.5.3 Owners of affected property shall be notified in person, where possible. If an owner cannot be contacted in person, notification shall be made using **Exhibits 9.6** and **9.7**, Property/Vehicle Absence Notification (or similar) Letters.

6.1.5.4 Claims is be notified if the spill affects private or public property.

6.1.6 Immediately notify one of the following, as appropriate (See Appendix B "Spill Notification Flow Chart" and Section 7.3 Notifications) of the occurrence of the spill and provide information to complete the Spill Notification Checklist (**Exhibit 9.3**).

- Electric System Operator (ESO)
- Supervising Services Operator (SSO)
- Gas System Operator (GSO)
- Distribution Central Dispatching (DCD) at 718-403-2866, or 2867,
- System Control Center (SCC) at 718-403-2922, or 2923
- Central Monitoring Station (CMS) operator at 516-545-4333.
- The caller shall provide the following information:

– Nature of the emergency, to include, if possible, the source, character and amount of materials discharged.

– Location.

– If injuries are involved.

– Caller's name.

6.1.7 If properly trained supervision and personnel are present:

6.1.7.1 Initiate spill response activities in accordance with guidelines in Section 7. Consult with Environmental Operations & Customer Support and contact spill clean-up contractor, if required,

6.1.7.2 Standby at the scene to provide on-site supervision for spill cleanup contractor, if utilized,

6.1.7.3 Provide backfill to make excavated areas safe when necessary (see Section 7.6.3),

6.1.7.4 Obtain samples of dielectric fluid or other hazardous material/waste and transmit to the Environmental Operations & Customer Support Department Analytical Laboratory for analysis, and

6.1.7.5 Perform a field test (Chlor-N-Oil or approved equivalent) on oil from the leaking equipment (if the electric system is involved) when possible. This test kit is not to be used on condensate from the gas system (See Section 7.5.)

6.1.8 Where required, transport equipment and spill debris in accordance with regulations or arrange for transportation with departments that have permitted vehicles or through Environmental Operations & Customer Support Department.

6.1.8.1 Coordinate the transportation of equipment and spill debris to the Hicksville TSDF, Greenpoint Hazardous Waste Storage Area, Canarsie Service Center or Staten Island Service Center through the Environmental Operations & Customer Support Department -

Hazardous Materials Supervisor. Material generated in New York City should only be transported to the work-out location from which the truck originated.

6.1.8.2 Coordinate the preparation and signature of a hazardous waste manifest or shipping paper, as applicable, in accordance with GO-10284 and with the assistance of Environmental Operations & Customer Support Department, or the spill response contractor.

6.1.9 Any Employee at the scene of a spill shall not sign any forms from governmental agencies on the scene. If necessary, advise the appropriate officials that the Company's Legal Department must first review these forms. Environmental Engineering and Compliance and the Legal Department shall be notified immediately under these circumstances.

6.2 Environmental Operations & Customer Support Department shall be responsible to:

6.2.1 Develop and implement disposal contracts with qualified vendors for the transport and disposal of PCB and hazardous and non-hazardous regulated waste, with assistance from Environmental Engineering and Compliance.

6.2.2 Manage the Bulk Non-hazardous Oil Spill Debris Facility in accordance with applicable solid waste regulations.

6.2.3 Implement all provisions related to PCB and hazardous and non-hazardous waste management as detailed in the Hicksville Operations Center Part 373 Permit as follows:

6.2.3.1 Accept all properly identified, packaged and labeled wastes and debris,

6.2.3.2 Inspect all incoming wastes to insure that the materials are properly identified, packaged and labeled,

6.2.3.3 Ensure that all waste materials received are promptly placed into appropriate storage areas, and maintain storage areas in accordance with the applicable regulations,

6.2.3.4 Sample waste materials as required,

6.2.3.5 Secure all storage areas,

6.2.3.6 Maintain an inventory of all PCB and hazardous waste materials received, including sampling results,

6.2.3.7 Maintain records for a minimum of five (5) years,

6.2.3.8 Maintain a copy of all incoming and outgoing waste manifests,

6.2.3.9 Perform inspections of waste storage areas as detailed in the 373 Permit, and

6.2.3.10 If problems are discovered during inspections, they are to be logged and corrective actions taken and signed off by appropriate supervisory personnel.

6.2.4 In accordance with G.O.10284 and the Hicksville Part 373 Permit requirements, if applicable, take appropriate corrective action in the event of an emergency situation, i.e., spills, fires, etc.

6.2.5 If a spill of PCB, hazardous, or non-hazardous waste occurs, spill notifications will be made in accordance with the Spill Notification Report (**Exhibit 9.4**), the Contingency Plan for the Hicksville Operations Center, and the Spill Notification Directory for all other locations.

6.2.6 Provide spill response and initial regulatory notifications for responsible departments, where appropriate.

6.2.6.1 Perform initial government agency notification on spill incidents in conformance with the Spill Notification Directory.

6.2.6.2 Initiate emergency spill response services when notified of a non-fuel oil (Electric Production) spill for all waste generator organizations, unless otherwise directed by an individual waste generator organization. See Section 6.1. (Waste Generator Organization Responsibilities).

6.2.6.3 Perform sampling for PCB and/or hazardous materials at spill incidents to determine extent of contamination and to verify spill cleanup, as necessary.

6.2.6.4 Provide analytical services for the identification of PCB and hazardous materials associated with spill incidents.

6.2.6.5 Provide spill cleanup services for small land based spills that do not require a cleanup contractor.

6.2.6.6 Direct, coordinate and provide field supervision of spill contractor.

6.2.6.7 Develop and maintain a spill-tracking program.

6.2.6.8 Complete the Spill Incident Report (**Exhibit 9.4**) and the Spill Incident Form (SND TAB I), and when complete send copy to Environmental Engineering & Compliance Department

6.2.6.9 Notify Claims when necessary for restoration of private property damaged by spills and cleanup operations.

6.2.6.10 Notify Public Relations if potential media impact results from incident.

6.2.7 Provide for the transportation of waste through Environmental Operations & Customer Support Department :

6.2.7.1 Prepare eight (8) page NYS Hazardous Waste Manifest in accordance with GO-10284,

6.2.7.2 Ensure that transportation of PCB and hazardous wastes is accomplished by permitted vehicles and that transporter is familiar with requirements under 49 CFR Parts 172 through 178, and 6 NYCRR Part 364,

6.2.7.3 Arrange for disposal of PCBs and hazardous and non-hazardous wastes to authorized disposal facility(s),

6.2.7.4 Contact disposer contracted for the particular waste and establish schedule for pickup,

6.2.7.5 Check 6 NYCRR Part 364 Permit of contractor transporter for valid permit identifying waste classification and disposal site identification,

6.2.7.6 Prepare all waste materials for disposal, record all waste ID numbers and all other pertinent information,

6.2.7.7 Assist affected department in the proper preparation of manifests for non-hazardous waste,

6.2.7.8 Obtain transporter's signature on manifest and ensure that all entries are legible,

6.2.7.9 Ensure that shipment of waste arrives at the designated TSD facility on schedule,

6.2.7.10 Forward certificates of disposal or recycle and other requisite documentation to regulatory agencies to close out active spills, when requested,

6.2.7.11 Forward appropriate copies of manifests to Environmental Engineering and Compliance; retain photocopies of manifests at the generating facility, and

6.2.7.12 Notify all appropriate regulatory agencies as required regarding waste shipments not in compliance with applicable regulations or consistent with manifesting requirements.

6.2.8 Provide on-the-job training, OSHA training, refresher training and other appropriate training for Environmental Operations & Customer Support Department personnel involved with the handling of PCB waste materials.

6.2.8.1 Maintain training records for individuals trained. Records are to be kept a minimum of five (5) years.

6.3 Environmental Engineering and Compliance Department shall be responsible to:

6.3.1 Ensure compliance with Federal, State and local regulations related to the management of PCBs and hazardous and non-hazardous materials/wastes,

6.3.2 Act as regulatory liaison to ensure overall compliance with regulations,

6.3.3 Review periodically this procedure (GO-10329) and all other relevant corporate procedures and update as necessary or at least every three years,

6.3.4 Revise procedures and PCB and hazardous and non-hazardous material/waste management practices to insure compliance with revised regulations,

6.3.5 Support operations at the Company facilities involved in PCB and hazardous and non-hazardous material management to insure regulatory compliance and compliance with procedures,

6.3.6 Obtain all necessary Federal, State and local permits;

6.3.6.1 Secure NYS Part 364 permits, as requested, for the transport of PCB and hazardous materials,

6.3.6.2 Every five years and when required, revise the NYS Part 373 permit for the Hicksville Operations Center to facilitate PCB and hazardous waste management,

6.3.7 Provide technical and management assistance and/or regulatory interface for responsible departments for spill incidents, where appropriate;

6.3.7.1 Provide technical assistance to responsible departments on spill clean up techniques, as required,

6.3.7.2 Manage long term remediation efforts and analyses beyond initial cleanup.

6.3.8 Work with Purchasing in the development of contracts related to the management of PCBs and hazardous and non-hazardous waste;

6.3.8.1 Prepare and maintain a Corporate wide specification for non-fuel oil emergency and non-emergency spill response to establish one purchase order for use by the "waste generating organizations" described in this procedure,

6.3.8.2 Develop technical specifications for contracts related to the disposal of PCBs and hazardous and non-hazardous wastes (including waste oil and oily rags),

6.3.8.3 Develop technical specifications for contracts related to the cleanup of PCBs and hazardous and non-hazardous waste spills,

6.3.8.4 Review qualifications and proposals of transporters, disposers and other contractors involved with the management of PCBs and hazardous and non-hazardous wastes in conjunction with the

Purchasing, Environmental Operations & Customer Support and, as necessary, Waste Generating Organizations,

6.3.9 Prepare and file reports to appropriate government agencies and other Company organizations as follows;

6.3.9.1 Monthly reports to LIPA of spills and other T&D activities,

6.3.9.2 Bi-annually, the PSC PCB report for the management of PCB items,

6.3.9.3 Toxic Substances Control Act (TSCA) Annual PCB Document Log for the management of PCB waste material,

6.3.9.4 Annual New York State and County Hazardous Waste Generator reports for Company waste generators and for the Hicksville Operations Center as a TSD facility,

6.3.9.5 Provide quarterly reports to the Tax Department entailing the type and amount of PCB wastes disposed of during the preceding quarter.

6.3.10 Manage documentation related to spill close-out reporting to regulatory agency as follows;

6.3.10.1 Develop and maintain a tracking system for the manifests,

6.3.10.2 Forward appropriate copies of manifests to state agencies.

6.3.11 Along with Environmental Operations & Customer Support, assist requesting departments in developing and conducting training programs on PCB and hazardous and non-hazardous waste management and spill cleanup, either directly or through the Division of Staffing & Development,

6.4 Facilities Management Department shall be responsible to:

6.4.1 As a waste generator organization, meet the responsibilities of Section 6.1, and:

6.4.2 Notify the area Central Monitoring Station (CMS), DCD or SCC of a spill immediately upon discovery and provide information for CMS, DCD or SCC to complete Spill Notification Checklist (**Exhibit 9.3**).

6.4.3 Ensure CMS/DCD/SCC notifies Environmental Operations & Customer Support Department, and if required the Environmental Engineering & Compliance Department.

6.4.4 Provide field support and access to responding organizations in the event of a spill from the Facilities Equipment or support contractors at Common Plant Facilities.

6.5 Electric System Operations Department shall be responsible to:

6.5.1 As a waste generator organization, meet the responsibilities of Section 6.1, and,

6.5.2 If Electric System Operations Department personnel discover a spill, notify the Electric System Operator (ESO) immediately upon discovery and provide information for ESO to complete Spill Notification Checklist (**Exhibit 9.3**),

6.5.3 The ESO will notify Environmental Operations & Customer Support Department per the SND TAB I for all spill incidents at power stations and substations. Notify Environmental Engineering & Compliance Department if the spill is Class 2, 3 or 4 (**see Exhibit 9.8**) per the SND TAB I.,

6.5.4 The ESO may request spill class verification or assistance from Environmental Operations & Customer Support, if necessary,

6.5.5 If necessary, the ESO will request Environmental Operations & Customer Support to notify the emergency spill clean-up contractor,

6.5.6 The ESO will notify the appropriate regulatory agencies in accordance with the Spill Notification Directory,

6.5.7 The ESO will complete a Spill Incident Form in accordance with Tab I of the Spill Notification Directory and forward a copy to Environmental Operations & Customer Support Department.

6.6 Electric Design and Construction Department (ED&C) shall be responsible to:

6.6.1 As a waste generator organization, meet the responsibilities of Section 6.1, and,

6.6.2 If ED&C Department personnel discover a spill, notify the area Supervising Service Operator (SSO) of a spill immediately upon discovery and provide information for SSO to complete Spill Notification Checklist (**Exhibit 9.3**),

6.6.3 Ensure SSO notifies Environmental Operations & Customer Support Department, and if required the Environmental Engineering & Compliance Department,

6.6.4 Provide field support in the event of a spill from the electric transmission and distribution system.

6.7 Electric Service Department shall be responsible to:

6.7.1 As a waste generator organization, meet the responsibilities of Section 6.1, and,

6.7.2 If Electric Service Department personnel discover a spill, notify the area Supervising Service Operator (SSO) of a spill immediately upon discovery and provide information for SSO to complete Spill Notification Checklist (**Exhibit 9.3**),

6.7.3 If a spill is observed from the electric transmission and distribution system, request the support of Electric Design and Construction Department (as necessary) and standby at the spill location until their arrival,

6.7.4 When a spill is reported to the SSO, the SSO shall obtain the information outlined in Spill Notification Checklist (**Exhibit 9.3**) and promptly notify Environmental Operations & Customer Support Department per SND TAB I, to perform initial regulatory notifications. Environmental Engineering & Compliance is to be notified if the spill is Class 2,3, or 4 (**see Exhibit 9.8**) per the SND TAB I,

6.7.5 The SSO will also request that appropriate spill cleanup equipment be brought to spill location for use by Electric Design and Construction or will contact the outside cleanup contractor and arrange for supervision of contractor's activities as necessary, until arrival of Electric Design and Construction personnel,

6.8 Electric Production Department shall be responsible to:

6.8.1 As a waste generator organization, meet the responsibilities of Section 6.1, and:

6.8.2 If Electric Production Department personnel discover a spill, notify the Electric System Operator (ESO) of a spill immediately upon discovery and provide information for ESO to complete Spill Notification Checklist (**Exhibit 9.3**).

6.8.3 Ensure ESO notifies Environmental Operations & Customer Support Department, and if required the Environmental Engineering & Compliance Department.

6.8.4 If a spill is observed from the electric transmission and distribution system, request the support of Electric Design and Construction Department (as necessary) and standby at the spill location until their arrival.

6.9 Gas System Operations Department (LI) shall be responsible to:

6.9.1 As a waste generator organization, meet the responsibilities of Section 6.1 and,

6.9.2 Notify the Gas System Operator (GSO) of a spill or discharge of liquids (e.g., natural gas condensates or oil) or powder immediately upon discovery and provide information for GSO to complete the Spill

Notification Checklist (**Exhibit 9.3**). Provide information as indicated in Gas Plant Emergency Action Procedure.

6.9.3 The GSO will notify Environmental Operations & Customer Support Department per the SND TAB I for all spills and provide information concerning the spill or release as outlined in the Spill Notification Checklist (**Exhibit 9.3**.) Notify Environmental Engineering & Compliance Department for spill classes 2, 3 & 4 (**see Exhibit 9.8**)per the SND TAB I.

6.9.4 If necessary, request Environmental Operations & Customer Support Department support to initiate emergency spill clean-up contractor notification.

6.9.5 At any time during normal operations, if liquids or solids (dust) are found in the gas system, a sample shall be collected and forwarded to the Analytical Laboratory for analysis. Testing should be done for concentration of Benzene. Copies of all results shall be provided to Environmental Engineering and Compliance Department. If the frequency of occurrence is considered unusually high, the operating department shall contact Environmental Operations & Customer Support Department to jointly determine a suitable sampling frequency.

6.10 Gas Construction, Maintenance, and Services Departments shall be responsible to:

6.10.1 As a waste generator organization, meet the responsibilities of Section 6.1, and:

6.10.2 Notify the Gas System Operator (GSO) of a spill or discharge of liquids (e.g., natural gas condensates or oil) or powder immediately upon discovery and provide information for GSO to complete Spill Notification Checklist (**Exhibit 9.3**).

6.10.3 Ensure GSO notifies Environmental Operations & Customer Support Department, and if required the Environmental Engineering & Compliance.

6.10.4 If necessary, request Environmental Operations & Customer Support Department support to initiate emergency spill clean-up contractor notification.

6.10.5 At any time during normal operations, if liquids or solids (dust) are found in the gas system, a sample shall be collected and forwarded to the Analytical Laboratory for analysis. Testing should be done for concentration of Benzene. Copies of all results shall be provided to Environmental Engineering and Compliance Department. If the frequency of occurrence is considered unusually high, the operating department shall contact Environmental Operations & Customer Support Department to jointly determine a suitable sampling frequency.