Spill Prevention Control and Countermeasure (SPCC) Plan &

Preparedness, Prevention, and Contingency (PPC) Plan for Construction Projects

Revised October 2017

Environmental Construction Permitting
5400 Westheimer Court
Houston, Texas 77056-5310

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ABBREVIATIONS AND DEFINITIONS

CERCLA	Comprehensive Environmental Response, Compensation and Liability Act
CI	Chief Inspector (Company employee or Contractor Employee performing the duties of the onsite Construction Manager or Engineer)
Company	Enbridge, Inc.
Company SC	Company Spill Coordinator (The Environmental Inspector or the Chief Inspector)
Contractor	Third party service provider performing construction activities for the Company on property owned or under the control of the Company. This role may be filled by the Company on small projects constructed by Company personnel and equipment.
Contractor SC	Contractor Spill Coordinator
CWA	Clean Water Act
DOT	U. S. Department of Transportation
E&C	Engineering & Construction
ECP	Environmental Construction Permitting
EHS, EH&S	Environmental Health and Safety
EI	Environmental Inspector (Company employee or Contractor Employee performing the duties of onsite environmental specialist overseeing Contractor compliance with environmental permit conditions, laws and regulations)
E&SCP	Erosion & Sedimentation Control Plan
FERC	Federal Energy Regulatory Commission
FWPC	Federal Water Pollution Control Act
HDD	Horizontal Directional Drill
JSA	Job Safety Analysis
MSDS	Material Safety Data Sheets
ppm	Parts per Million
Environmental Lead	Environmental Construction Permitting Specialist assigned to the project
OPA	Oil Pollution Act
RCRA	Resource Conservation and Recovery Act
SPCC Plan or Plan	Spill Prevention, Control and Countermeasure Plan
TSCA	Toxic Substances Control Act

1.0 PURPOSE/PLAN OBJECTIVE

Enbridge, Inc. ("Company") has prepared this Spill Prevention, Control and Countermeasure ("SPCC") Plan ("Plan") for construction projects in the United States. The purpose of this Plan is to reduce the probability and risk of a potential spill or release of oil or hazardous materials by the Company or Contractor during construction-related activities, by providing training to the Company and Contractor and expediting spill response and cleanup. This plan is not intended to meet the requirements of existing facility operations.

The Plan's specific objectives are to identify and address:

- The type and quantity of material handled, stored, or used on site during construction;
- The measures to be taken for spill preparedness and prevention;
- Emergency response procedures;
- Spill incident reporting/notification procedures; and
- Local emergency response team arrangements.

This plan has been prepared to meet the requirements of the Federal Energy Regulatory Commission's ("FERC's") *Upland Erosion Control, Revegetation, and Maintenance Plan* (Plan) and *Wetland and Waterbody Construction and Mitigation Procedures* (Procedures), the Oil Pollution Act ("OPA"), the Federal Water Pollution Control Act ("FWPC"), the Comprehensive Environmental Response, Compensation and Liability Act ("CERCLA") of 1980, the Resource Conservation and Recovery Act ("RCRA"), the Toxic Substances Control Act ("TSCA") and the Clean Water Act ("CWA").

The Company Environmental Construction Permitting ("ECP") group is responsible for the development and maintenance of this Plan. The Plan will be distributed to the Company Engineering & Construction ("E&C") Department's teams and associated Company personnel and will be included in the construction contract. It is the responsibility of the E&C teams to distribute to any necessary Contractors for implementation.

This Plan outlines both Company and Contractor responsibilities by topic. The Contractor is responsible for implementation of the Plan. In the absence of a Contractor, the Company will be responsible for both Company and Contractor responsibilities as they are laid out in this Plan.

A copy of the Plan must be on site during active construction and should also be maintained at the closest construction field office.

2.0 TRAINING

The Company requires all Contractor and Company personnel engaged in any construction activity to receive training in the implementation of the Plan prior to the commencement of on-site construction related activities.

Site visitors are to be given a brief review of the Plan as part of their orientation on safety and emergency procedures prior to the start of any on-site activities.

Contractor Responsibility

The Contractor will be responsible for the following:

- Keep training records
- Perform training briefings through ongoing meetings like tailgates and the daily project Job Safety Analysis ("JSA") that include:
  - Precautionary measures to prevent spills;
  - Potential sources of spills, including equipment failure or malfunction;
  - Standard operating procedures in the event of a spill;
  - Applicable notification requirements;
  - Equipment, materials and supplies available for clean-up of a spill;
  - Hazardous waste identification procedures;
  - Generation and proper handling of all non-hazardous waste, hazardous waste, and other toxic substances;
  - Proper storage, labeling, transportation and disposal of non hazardous and hazardous waste; and
  - Sample collection procedures.

Company Responsibility

The Company Chief Inspector ("CI"), Environmental Inspector ("EI"), or their designate will perform the following:

- Teach awareness-level training at the initial project environmental training session;
- Ensure further training is available for other new project personnel; and
- Audit training records kept by the Contractor as necessary.

3.0 PRE-PLANNING - MATERIAL INVENTORY AND DOCUMENTATION

Contractor Responsibility

The Contractor will be responsible for the following **prior** to the start of construction:

- Develop an inventory of all oil/hazardous material stored or used during construction;
- Complete Tables I, II, IV, V and VI (see Appendix A);
- Obtain material safety data sheets ("MSDS") (Appendix B) for all hazardous and non-hazardous substances listed in Table I (see Appendix A);
- Prepare a basic facility diagram or sketch for any storage areas, including pipe yards and temporary storage areas. The diagram should include locations of oil-filled containers, direction of run-off, emergency evacuation routes and assembly areas (see Appendix E); and
- Submit the required Tables, MSDS, and signature pages to the ECP's Environmental Lead for review and approval.

Company Responsibility

- Complete Tables III (see Appendix A);
- Review the Tables, MSDS, and signature pages submitted by the Contractor for approval; and
- Distribute approved Tables, MSDS, and signature pages to include in Plan as Appendices A, B and D.
- Fill out any signature pages or forms (see Appendix D)
    - Management Approval and Cleanup Commitment
    - Certificate of Determination of Substantial Harm Criteria

4.0 SPILL AND LEAK PREPAREDNESS AND PREVENTION

4.1 Prevention and Preparedness

Contractor Responsibility

- Complete Appendix A, Table I, Material and Waste Storage Inventory, and Table VI, Areas for Potential Leaks and Spills, prior to construction;
- Provide spill prevention, containment, and clean up equipment, and keep it available on-site;
- Perform daily inspections of all equipment, storage tanks, and/or container storage areas;
- Repair all leaking equipment, machinery or tools immediately. If items cannot be repaired, remove them immediately from the project site;
- Maintain a minimal spill kit (absorbent diapers, plastic bags, gloves, etc.) for each piece of hydraulically operated equipment and personnel vehicles within the project area;
- Store materials as indicated in the storage facility diagram or sketch provided by the Contractor in Appendix E;
- Submit a secondary containment plan for any hazardous material storage within the project area to the Company for approval **prior** to storage; and
- Obtain written approval from the project CI or EI for hazardous material storage within 100 feet of a wetland or waterbody.

Company Responsibility

- Review any secondary containment or storage plans submitted by the Contractor for approval.

4.1.1 Secondary Containment

Contractor Responsibility

- PCB (50 parts per million (“ppm”) or greater) storage tanks shall be double-walled or have secondary containment that will hold 200 percent of the tank capacity;
- All containers with a storage capacity greater than 55 gallons shall have temporary containment (see Appendix A, Table I for type of temporary containment); and
- Pumps and other portable fuel burning equipment used within 100 feet of a jurisdictional wetland or waterbody will be placed and operated within appropriate secondary containment systems to prevent spills. Secondary containment will hold at least 110% of the tank capacity of the largest tank inside the containment area.

4.1.2 Storage/Inspection (Tanks/Containers)

Contractor Responsibility

- Operate only those tanks for fuel and material storage that meet the approval of the Company;
- Elevate tanks a maximum of two feet above grade;
- Inspect vehicle-mounted tanks to ensure all are equipped with flame/spark arrestors on all vents to prevent self-ignition;
- Locate tank storage in areas that are at least 100 feet from all waterbodies, wetlands, and designated municipal watershed areas, with certain exceptions as approved by ECP and listed in Appendix A, Table IV;
- Complete Appendix A, Table IV, Tank and Container Storage Exception Areas, and submit to the Company for approval prior to construction;
- Inspect all tanks daily for leaks and deterioration. The results of all inspections shall be made available to the Company upon request;
- Do not store incompatible materials in sequence in tanks prior to decontamination (A general list of potentially incompatible materials that may be used during construction are included in Appendix A, Table I);
- Store small cans of gasoline, diesel, solvents, etc., within the temporary secondary containment or within secured trailers or vehicles when not in use;
- Replace leaking and/or deteriorated containers as soon as the condition is first detected; and
- Ensure that all container storage and containment areas being used to store hazardous materials or wastes are in compliance with applicable local, state and federal requirements.

4.1.3 Loading/Unloading Areas

Contractor Responsibility

- Transfer liquids and refuel only in pre-designated and pre-approved locations that are at least 100 feet from all waterbodies and wetlands, with certain exceptions as approved by the EI and listed in Appendix A;
- Inspect the area beneath loading/unloading location for spills before and after each use;
- Utilize drip pans at all hose connections while loading/unloading liquids. If a leak or spill occurs, the loading/unloading operation will be stopped and the spill will be contained, cleaned up and collected prior to continuing the operation;
- Inspect all outlets of the tank trucks prior to leaving the loading and unloading area to prevent possible leakage from the truck while in transit;
- Equip any service vehicle used to transport lubricants and fuel with an emergency response spill kit. At a minimum, this kit must include:
  - 25 lbs of granular oil absorbent
  - 10, 48" x 3" oil socks

- 5, 17" x 17" oil pillows
- 1, 10" x 4" oil boom
- 20, 24" x 24" x 3/8" oil mats
- Garden size, 6 mil, polyethylene bags
- 10 pair of latex gloves
- 1, 55-gallon polyethylene open-head drum;

- Equip any service vehicle used to transport lubricants and fuel with a chemical response kit. At a minimum, this kit must include:
  - 1 bag of loose chemical pulp
  - 2 to 3, 17" x 17" chemical pillows
  - 2, 48" x 3" chemical socks
  - 5, 18" x 18" x 3/8" adsorbent mats
  - garden-size, 6 mil, polyethylene bags
  - 10 pair of latex gloves
  - 1, 30-gallon polyethylene open-head drum
  - hazardous waste labels

Company Responsibility

- Personnel shall be present during loading and unloading activities.

5.0 CONTINGENCY PLAN AND EMERGENCY PROCEDURES

All Company and Contractor personnel have responsibilities for spill prevention, control, and countermeasure.

Contractor Responsibility

- Maintain adequate manpower and equipment at the pipe yard or contractor ware yard necessary to divert any spill from reaching waterbodies and wetland areas; and
- Complete Appendix A, Table I, Emergency Response and Personal Protective Equipment, with a list of emergency equipment and storage location.

Company Responsibility

- Complete Appendix A, Table III, Key Emergency Contacts, prior to construction, and update as necessary.

First Responder Responsibility

The first responder is the person who first observes a spill or release of oil or other hazardous materials to the environment.

This person will take the following steps:

- Assess the situation to determine if the situation poses an immediate threat to human health or the environment;
- Identify hazardous material involved, if any;
- Report the spill to the Company Spill Coordinator ("Company SC") and Contractor Spill Coordinator ("Contractor SC") immediately; and
- Standby at a safe distance and keep others away.

Contractor SC Responsibility

- Coordinate the response to all spills which occur as a result of Contractor operations;
- Report the spill to the Company;
- Coordinate with the Company SC; and
- Conduct subsequent site investigations and associated incident reports unless otherwise directed by the Company.

The Contractor SC may be removed by the Company SC as spill response coordinator at the discretion of the Company.

The Contractor SC will direct Contractor personnel to:

- Shut off source of spill or leak as quickly as possible;
- Minimize affected area with appropriate containment or dike/berm;
- Assemble required spill response equipment as required (protective clothing, gear, heavy equipment, pumps, absorbent material, empty drums, etc.);
- Ensure that spilled material is placed in appropriate containers, in accordance with the best management practices and applicable laws and regulations;
- Properly label and store containers in accordance with applicable requirements; and
- Ensure that all spill response equipment is fully functional. Any equipment that cannot be reused shall be replaced.

Company SC Responsibility

The Company SC will be responsible for overseeing the Contractor SC's clean up of all spills of oil or hazardous materials.

Upon notification, the Company SC shall:

- Assess situation for potential threat to human health, environment and the neighboring community;
- Implement evacuation, if necessary;
- Activate emergency shutdown, if necessary;
- Control source as conditions warrant;
- Ensure that incompatible materials are kept away from the impacted area;
- Keep any potential ignition source away from the impact area, if spilled material is flammable;
- Coordinate sampling, disposal and equipment decontamination with Environmental Health and Safety ("EHS") in Houston, if necessary;
- For spills of PCBs, contact EHS for special spill response requirements related to PCB spills;
- Assist with the coordination of cleanup and disposal activities;
- If necessary, contact outside remediation services, in coordination with EHS, to assist with clean up;
- Notify EHS of all quantities and description of wastes to be handled by EHS;
- Complete the *EH&S Incident Investigation Form* (see Appendix C) and distribute accordingly;
- For unanticipated release of hydrostatic test waters, notify state contact if required by state permit, in accordance with timeframes required by state permit;
- Review permits to determine if immediate water sampling of test water is required and arrange if necessary; and
- Determine if local Right of Way agent will notify public officials (e.g. township manager and/or mayor).

6.0 SPILL CLEAN-UP/WASTE DISPOSAL PROCEDURES OF HYDROSTATIC TEST WATER

6.1 Oil/Fuel a;nd Hazardous Material Spills and Unanticipated Releases

Contractor Responsibility

- Ensure no immediate threat to surrounding landowners or environment;
- Identify/verify the material and quantity released;
- Review MSDS to determine the proper handling;
- Ensure that Personal Protective Equipment and containers are compatible with the substance;
- Remediate small spills and leaks as soon as feasible. Use adsorbent pads whenever possible to reduce the amount of contaminated articles;
- Restrict the spill by stopping or diverting flow to the oil/fuel tank;
- If the release exceeds the containment system capacity, immediately construct additional containment using sandbags or fill material. Every effort must be made to prevent the seepage of oil into soils, wetlands and surface waters;
- Block off drains and containment areas to limit the extent of the spill. For chemical spills, never wash down a spill with water;
- If a release occurs into a storm drain or stream, immediately pump any floating layer into drums. For high velocity streams, place oil booms or hay bales between the release area and the site boundary and downstream of affected area. As soon as possible, excavate contaminated soils and sediments within approved work areas;
- Collect and reclaim as much of the spill as possible using a hand pump or similar device. Containerize contaminated soils in an appropriate Department of Transportation ("DOT") container in accordance with applicable requirements. Never place incompatible materials in the same drum;
- For larger quantities of soils, construct temporary waste piles using plastic liners placing the contaminated soils on top of the plastic and covered by plastic. Plastic-lined roll-off bins should be leased for storing this material as soon as feasible;
- Properly label any drums, containers or storage piles in accordance with applicable requirements;
- Move drum to secure staging or storage area;
- Decontaminate all equipment in a contained area and collect fluids in drums;
- Document and report cleanup activities to the Company SC as soon as feasible; and
- If environmentally sensitive resources (wetlands, waterbodies) exist in the area, ensure that Best Management Practices as described in Company's Erosion &Sedimentation Control Plan ("E&SCP") are utilized to minimize impact to these resources.

Company Responsibility

- If necessary, arrange for sampling the substance for analysis and waste profiling, according to instructions from the Company Standard Operating Procedures, and/ or EHS;
- Document and report activities to EHS as soon as feasible.

6.2 Disposal of Contaminated Materials/Soils

For Company and Contractor protocol on the disposal of contaminated materials, soils, or any other waste materials, please see the Company Waste Management Plan.

6.3 Notification

Company Responsibility

- The Company SC shall notify the Emergency Spill Hotline at (800) 735-6364 and those listed in Appendix A, Table III, immediately for spills that meet any of the following criteria:
  - one pound or more of a solid material (excluding Horizontal Directional Drill ("HDD") mud) spilled on land;
  - five gallons or more of a liquid spilled on land;
  - creates a sheen on water; or
  - unanticipated release of hydrostatic test water.
- If necessary, notify the local fire department, law enforcement authority, or health authority as appropriate. The following information should be provided:
  - the name of the caller and callback number;
  - the exact location and nature of the incident;
  - the extent of personnel injuries and damage;
  - the extent of release; and
  - the material involved and appropriate safety information.
- An incident report form should be filled out following containment and cleanup of the spill or release. Incident data should be gathered using the *EH&S Incident Investigation Form* (see Appendix C) and should be sent to the appropriate ECP project manager for records retention and entry into the EPASS/ILP database.

7.0 HOUSEKEEPING PROGRAM

7.1 Construction Area

Contractor Responsibility

- Maintain construction area in neat and orderly manner; and
- Routinely collect and properly dispose of all trash off-site.

7.2 Contractor Yards/Ware Yards

Contractor Responsibility

- Produce a "site specific" plan to address storage, spill prevention and overall yard organization for all contractor yards and ware yards. Contractor yard "site specific" plans should include the following:
    - facility name;
    - physical address;
    - longitude and latitude coordinates;
    - directions to facility (including road names);
    - date of first oil and hazardous material storage;
    - location of oil and hazardous material containers greater than 55 gallons;
    - loading/unloading areas;
    - direction of drainage flow; and
    - primary and secondary evacuation routes.
- Provide adequate aisle spacing to allow unobstructed movement of personnel, fire protection equipment, spill control equipment, and decontamination equipment as necessary in storage areas;
- Ensure similar housekeeping practices enforced in construction areas are also implemented in storage areas; and
- Any facility with an aggregate aboveground oil storage capacity greater than 1,320 US gallons but less than 10,000 gallons must have the plan self-certified by the owner or operator of the qualified facility or a licensed Professional Engineer. Any facility with an aggregate aboveground oil storage capacity greater than 10,000 gallons must have the plan reviewed and certified by a licensed Professional Engineer.

7.3 Security

Contractor Responsibility

- Hazardous wastes and waste containing PCBs greater than 50 ppm will be stored in a secured location (i.e. fenced, locked, etc.). Fuel storage areas will be located to minimize, as much as possible, tampering by unauthorized personnel during non-operational hours.
- Complete Table V, Waste Storage Security Information, in Appendix A, prior to construction.

Company Responsibility

- Review Table V, Waste Storage Security Information in Appendix A, that has been prepared by the Contractor prior to construction.

Project Signatures:

Company Spill Coordinator:

Print Name

Signature Date

Contractor Spill Coordinator

Print Name

Signature Date

APPENDIX A - TABLES

TABLE I – MATERIAL AND WASTE INVENTORY

Oil and Fuel to be used or stored on site during construction:

STORAGE CAPACITY OF OIL FILLED-CONTAINERS

Container Number[a/]	Storage capacity (volume)	Location

[a/] The reference container numbers should correspond to the facility diagram in Appendix E.

Commercial Chemicals to be used or stored on site during construction:

Hazardous and Non-Hazardous Wastes to be used or stored on site during construction:

Incompatible Materials to be used or stored on site during construction:

Type of Temporary Containment containers to be used:

TABLE I TO BE COMPLETED BY CONTRACTOR
Prior to the Start of Construction and updated as necessary

TABLE II – EMERGENCY RESPONSE AND PERSONAL PROTECTIVE EQUIPMENT

Spill Response:

Equipment	Quantity	Location

Fire Protection:

Equipment	Quantity	Location

Personnel Protection:

Equipment	Quantity	Location

TABLE II TO BE COMPLETED BY CONTRACTOR
Prior to the Start of Construction and updated as necessary

TABLE III – KEY EMERGENCY CONTACTS

The list of key personnel who will be contacted in the event of an emergency or spill incident include:

1. ***Company Emergency Contacts*** Contact Name Phone Number

Company Spill Coordinator & Environmental
Inspector (within 15 minutes identifying of incident)

24-hour Emergency Spill Hotline -- 1-800-735-6364
(within 15 minutes of identifying incident)

Regional Environmental Coordinator
(within 15 minutes of identifying incident)

ECP's Project Environmental Lead / PM
(notify within 60 minutes of incident & submit
Spill Report Form within 24 hours to ECP PM)

Company Project Manager

Company Environmental Coordinator

Field Construction
Company Construction Coordinator

2. ***Contractor Emergency Contact***

Contractor Spill Coordinator

3. ***Local Authorities*** – As necessary

Emergency contact for Police, Fire & Medical assistance ***Dial 911***

Non-Emergency Local Authorities or Contacts		
Location	**Contact**	**Phone Number**

4. ***Environmental Agencies***

Notification to be made by Regional Environmental Coordinator and ECP's PM

5. ***Potential Environmental Remedial Service Contractors***

Clean Harbors Environmental Services, Inc.	Howard Alexander	(800) 782-8805
Safety-Kleen (FS), Inc	Edward A. Mitchell	(281) 478-7700
U.S.A. Environment	Cesar Garcia	(713) 425-6925 or (832) 473-5354
WRS Infrastructure and Environment Inc	Steve Maxwell	(281) 731-0886

TABLE III TO BE COMPLETED BY COMPANY
Prior to the Start of Construction and updated as necessary

TABLE IV – TANK AND CONTAINER STORAGE EXCEPTION AREAS

Tank and container storage shall be located in areas that are at least 100 feet from all waterbodies and wetlands.

The below exceptions have been approved by ECP and EHS:

1.

2.

3.

4.

TABLE IV TO BE COMPLETED BY CONTRACTOR
Prior to the Start of Construction and updated as necessary

TABLE V – WASTE STORAGE SECURITY INFORMATION

TABLE V TO BE COMPLETED BY CONTRACTOR
Prior to the Start of Construction and updated as necessary

TABLE VI–AREAS FOR POTENTIAL LEAKS AND SPILLS

1.

2.

3.

4.

TABLE VI TO BE COMPLETED BY CONTRACTOR Prior to the Start of Construction and updated as necessary

APPENDIX B - MSDS

APPENDIX C – EH&S INCIDENT INVESTIGATION FORM

HSF-004 1/1/2011
AVAILABLE ELECTRONICALLY

Enbridge, Inc.

EHS Incident Investigation/Data Collection Form

This form replaces: C-23 Occupational Injury and Illness Report, 19-06 Field Spill Report, 19-20 Outside Agency Inspection, 19-21 Natural Gas Release Record, and 19-25 Contamination Encounter Report

(Must Be Completed)

BUSINESS UNIT	REGION (Circle One)	AREA	LOCATION (Entity)
US	Northeast / Southeast / Corporate		

Complete each section and field as applicable for the Incident Type you are entering. *All required fields **(bold)** are EPASS ILP system required and must be completed.*

Common fields applicable to all types of incidents.

Incident Type: ☐ Injury / Illness ☐ Vehicle ☐ Environmental ☐ Complaint ☐ Near Miss
(Check multiple incident types as appropriate)

Category: ☐ Incident with Loss ☐ Incident without Loss Initiating Event: _____

Status: Open ☐ **Do not include in rates and counts:** ☐ Note: (Pertains to all incidents without loss.)

Date Reported: _____ **Date Occurred:** _____ Time Occurred: _____ AM ☐ PM ☐

Describe exactly how the incident occurred. Be very specific in details without reference to individual(s) names.

Employee Name: _____ **Incident Owner (Supervisor) Name:** _____

Contractor Incident: ☐ Yes ☐ No **Dependent** ☐ **Independent** ☐

Contract Employee Name: _____ **Phone Number:** _____

Contractor Contact Name: _____ **Contractor Company Name:** _____

Contractor Address, City, State, Zip code _____

Time Work Began: _____ AM ☐ PM ☐ **Time work began cannot be confirmed:** ☐

Response Agency Involved: ☐ Police ☐ Fire ☐ Ambulance ☐ HazMat ☐ Insurance ☐ External Response Support

Emergency Response Coordination: ☐ Internal ☐ External **Third Party Damage:** _____

Description of Immediate Response: (Note: This information is included in the ILP e-mail initial incident notification.)

Section A

Injury / Illness Incident Detail **SRS TeleClaim Contact #: 1-866-880-1777** Enbridge, Inc. Account #: 57568

Classification: ☐ First Aid ☐ Medical Treatment ☐ Modified / Restricted Work ☐ Lost Time ☐ Fatality

NOTE: Contact Human Resources to determine if Certificate of Disability is appropriate.

Event/Exposure (i.e. fall, slip/trip, strain) _____ **Injury source (i.e. tool, chemicals)** _____

Body Part (i.e. R/L leg, hand, back) _____ **Nature of Injury (i.e. cut, bruise, burn)** _____

Reported to Case Manager / SRS : ☐ Yes ☐ No **OSHA Log Injury Type(i.e. injury, illness, hearing loss)** _____

OSHA Log Injury Short Description: _____

Section B

Vehicle Incident Detail Driver **MUST CALL** PHH @ 800-446-7052 and provide vehicle unit #.
For any other claims, contact SRS Teleclaim @ 866-880-1777 w/Enbridge, Inc. Account #: 57568

Vehicle Type: (i.e. car, pickup) _____ **Ownership (i.e. company, rental)** _____

Activity (i.e. turning, passing, backing): _____ **Location:(i.e. urban, ROW, highway):** _____

Collision Location (i.e. ROW, parking lot, intersection) _____ **Road Type (i.e. concrete, dirt)** _____

Contributing Factors (i.e. failure to yield, keep safe distance): _____

Traffic Controls (i.e. stop sign, traffic signal, railroad crossing): _____

Collision Type i.e. backing, turning, rear ended) _____ **Collision Object (i.e. vehicle, animal, object)** _____

Road Conditions (i.e. dry, wet, ice, snow) _____ **Weather Conditions (i.e. rain, snow, clear)** _____

Journey Purpose (i.e. Business, Personal, T/F Work) _____ Lighting (i.e. dawn, day, night): _____

Third Party Name _____ Address: _____

Environmental Incident Detail

Section C

Spill/release Source: _____ **Reportable:** ☐ Yes ☐ No **Unplanned Release:** ☐ Yes ☐ No

Unexpected Contaminated Soil Encountered: ☐ Yes ☐ No

Medium: ☐ Air ☐ Containment ☐ Ground ☐ Treatment System ☐ Water

Units: ☐ Gallons ☐ Pounds ☐ mmscf (millions) ☐ mcf (thousands) **Spill / Release Amount:** _____

Material (i.e. natural gas, oil, pipeline condensate, glycol) _____ Occur near wetlands: ☐

Environmental Impact: _____ Wind: Direction: _____ Speed: _____ Temperature: _____

Line Size: _____ Line Pressure: _____ Start Time: _____ End Time: _____

Section D

Transportation Incident Detail

Type of Shipment:

☐ Hazardous Material Shipment ☐ Undeclared shipment with no release ☐ Specification cargo tank

Type of Report: ☐ Initial Report ☐ Follow-up Report

Mode of Transportation: ☐ Air ☐ Highway/Roadway ☐ Rail ☐ Water

Spill Occurred: ☐ In transit ☐ Loading ☐ Unloading ☐ In Transit Storage

Carrier: _____ **Shipper:** _____

Spill Location - Address, City, State, Zip code: _____

Hazardous Material: _____ **Quantity:** _____ **Units (i.e. gallons)** _____

Comments: _____

Section E

Regulatory Information / Notification / Outside Agency Inspection Detail

Regulatory Notification: ☐ **Date:** _____ **Routine Inspection:** ☐ **Tests conducted:** ☐ **Explain:** _____

Regulatory Agency: _____ **Officer Name:** _____

Warning Issued: ☐ **Fine Issued:** ☐ **Amount:** _____ **Order / NOV Issued:** ☐ **Date:** _____

Reference #: _____ **Extension:** ☐ **Date:** _____ **Rescind:** ☐ **Date:** _____

Found During Inspection: ☐ **Suspect Soil:** ☐ **Sampling Required:** ☐ **Permit Exceedance:**

Accompanied by (name): _____ **Comments:** _____

Section F

EHS Complaint Detail

Complaint type (i.e. noise, odor, property damage): _____ ☐ New ☐ Ongoing

Parameters of Concern: _____

Attach any additional doctor injury status, police or agency reports as appropriate for the incident.

FAX OR EMAIL THIS DOCUMENT TO YOUR REGION EHS SPECIALIST for data entry into ILP within 24 hours of an environmental or safety incident AND fax a copy to Houston EHS at 713-386-4249.

Reported by: _____ Signature: _____ Phone: _____

Causal Factors (TapRoot®) and Corrective Actions*

(Contact Region EHS Specialist for help in completing this section.)
(EHS Specialist will utilize the most current version of the TapRoot® Root Cause Tree® Dictionary*)

Section G

ILP Incident #: _____ **Investigation End Date:** _____

It is essential to record the unique identifying number from the ILP database.

Risk Rank: ☐ 1 ☐ 2 ☐ 3 ☐ 4 (Check only one box.)
(See Risk Matrix)

TapRoot® Cause Outcome*

Causal Factor: A problem or issue that, if corrected, could have prevented and incident from occurring or significantly reduced the incident's consequences.*

Effective Corrective Action is **SMART**, effective, and reviewed for unintended consequences.*
- **S**pecific
- **M**easureable
- **A**ccountable
- **R**easonable
- **T**imely

1. Identify causal factors - up to 4 cause codes. (Free form text.)
2. Select from the following menu. Note: the line number on this form relates to text on the drop down menu in the ILP database. The number is not found in ILP.

Section H

No. Cause Code Menu (Not inclusive of all TapRoot® Cause Codes*)

1	Human Performance Difficulty	Procedures	Not Used/Not Followed
2	Human Performance Difficulty	Procedures	Wrong
3	Human Performance Difficulty	Procedures	Followed Incorrectly
4	Human Performance Difficulty	Training	No Training
5	Human Performance Difficulty	Training	Understanding NI (Needs Improvement)
6	Human Performance Difficulty	Quality Control	No Inspection
7	Human Performance Difficulty	Quality Control	QC NI (Quality Control Needs Improvement)
8	Human Performance Difficulty	Communications	No Communication or Not Timely
9	Human Performance Difficulty	Communications	Turnover NI
10	Human Performance Difficulty	Communications	Misunderstood Verbal Communication
11	Human Performance Difficulty	Management System	SPAC NI (Standard Practices and Controls Need Improvement)
12	Human Performance Difficulty	Management System	SPAC Not Used (Standard Practices and Controls Not Used)
13	Human Performance Difficulty	Management System	Oversight/Employee Relations
14	Human Performance Difficulty	Management System	Corrective Action
15	Human Performance Difficulty	Human Engineering	Human/Machine Interface
16	Human Performance Difficulty	Human Engineering	Work Environment
17	Human Performance Difficulty	Human Engineering	Complex System
18	Human Performance Difficulty	Human Engineering	Non Fault Tolerant System
19	Human Performance Difficulty	Human Engineering	Preparation
20	Human Performance Difficulty	Work Direction	Selection of Worker
21	Human Performance Difficulty	Work Direction	Supervision During Work
22	Equipment Difficulty	Tolerable Failure	
23	Equipment Difficulty	Design	Design Specs
24	Equipment Difficulty	Design	Design Review
25	Equipment Difficulty	Design	Independent Review NI (Needs Improvement
26	Equipment Difficulty	Equipment/Parts Defective	Procurement
27	Equipment Difficulty	Equipment/Parts Defective	Manufacturing
28	Equipment Difficulty	Equipment/Parts Defective	Handling
29	Equipment Difficulty	Equipment/Parts Defective	Storage
30	Equipment Difficulty	Equipment/Parts Defective	Quality Control
31	Equipment Difficulty	Preventive/Predictive Maintenance	PM NI (Preventive Maintenance Needs Improvement)
32	Equipment Difficulty	Repeat Failure	Management System
33	Natural Disaster	Sabotage	
34	Other		

Complete the Causal Factors and Cause Code on page 4.

Causal Factors free form text box. Cause Code Number i.e. 1 through 34

Section H

Causal Factor 1: _____

- **Cause Code Number:** _____
- **Cause Code Number:** _____
- **Cause Code Number:** _____

Causal Factor 2: _____

- **Cause Code Number:** _____
- **Cause Code Number:** _____
- **Cause Code Number:** _____

Causal Factor 3: _____

- **Cause Code Number:** _____
- **Cause Code Number:** _____
- **Cause Code Number:** _____

Causal Factor 4: _____

- **Cause Code Number:** _____
- **Cause Code Number:** _____
- **Cause Code Number:** _____

Section I

Corrective Action Information:

Title: _____

Author: _____

Author Date: _____

Origin Cause: _____

Proposed Corrective Action: _____

Proposed Completion Date: _____

Assigned to: _____

Actual Corrective Action: _____

Actual Completion Date: _____

After the investigation is complete, and when a corrective action is developed, ensure the causal factors, codes and corrective action information in this document is sent to the person responsible for data entry into ILP i.e. Region EHS Specialist or Supervisor.

FAX OR EMAIL THIS DOCUMENT TO YOUR REGION EHS SPECIALIST for data entry into ILP AND fax a copy to Houston EHS at 713-386-4249.

Prepared by: _____ Signature: _____ Phone: _____

* © System Improvements, Inc.

DISTRIBUTION:

Original - Station ENV File 9.2 or 10.0
Original - S&H File # 22.1, 22.2, or 22.5 as appropriate per H&S SOP
Copy - Region EHS
Copy - Houston EHS - fax 713-386-4249
Copy - Houston Fleet Services

RETENTION:

Original - See SOP 3 or 5 years
Original - See EHS Retention Rule
Copy - As needed
Copy - Permanent
Copy - As needed

ENBRIDGE, INC. EHS RISK MATRIX

Frequency	Likelihood *(facility, region, major project)*	Likelihood Category		C1	C2	C3	C4	C5
> 1/yr	Expected to occur more than once per year at a facility/project		L5	III	II	II	I	I
>1/10yrs	Expected to occur several times in facility/project lifetime		L4	III	III	II	II	I
>1/100yrs	Expected to occur once in the facility/project lifetime		L3	IV	III	III	II	II
>1/1,000 yrs	May occur in the facility/project lifetime		L2	IV	IV	III	III	II
>1/10,000 yrs	Remote chance of happening		L1	IV	IV	IV	III	III
				Consequence Category →				
Consequence			**Injury Outcome**	First Aid or Minor Illness	Medical Aid / OSHA Recordable Restricted Work.	Lost Time Injury	Permanent Disability	Fatality
			Environment	Insignificant onsite / localized impact	Negligible onsite or offsite impact below	Environmental impact resulting in regulatory	Significant impact leading to enforcement	Catastrophic impact, long-term liability,
			Financial	<$1K	$1-10K	$10-100K	$100K-$1M	>$1M
			Reputation	Individual concern, no media attention	Community concern with local media attention	State / Provincial concern with regional media attention	Response causing impact on share price	Response causing major impact on share price

Risk Ranking	Guideline Interpretation
I	It is recommended that no activity be permitted without immediate mitigation taken to lower the risk rank.
II	Further risk controls should be considered to lower either the probability or consequence of the risk.
III	Some risk controls may be required.
IV	No further reduction in risk is required.

APPENDIX D – REQUIRED SIGNATURE FORMS

Management Approval and Cleanup Commitment
40 CFR §112.7

This Spill Prevention, Control and Countermeasures Plan (Plan), including the Spill Procedures Chart and Supplemental Document, which has been prepared in accordance with 40 CFR 112, has been reviewed and approved by the Project Manager. The Project Manager has the level of authority to commit the necessary resources to fully implement this Plan and to contain and clean up any oil discharged at this facility. By signing below, the **Project Manager** also **authorizes station supervisors to expediently commit manpower, equipment, and materials necessary to contain and remove any harmful quantity of oil discharged from this facility** (40 CFR §112.7). **This commitment includes the authority to use company and/or contract personnel and equipment.**

Facility Name: _____

Location: _____

Signature: _____

Name: _____

Date: _____

Title: _____

ENBRIDGE

CERTIFICATE OF DETERMINATION OF SUBSTANTIAL HARM CRITERIA

Facility Name: _____

Location: _____

Does the facility transfer oil over water to or from vessels and does the facility have a total oil storage capacity greater than or equal to 42,000 gallons? Yes___ No ___

Does the facility have a total oil storage capacity greater than or equal to 1 million gallons and does the facility lack secondary containment that is large enough to contain the capacity of the largest aboveground oil storage tank plus sufficient freeboard to allow for precipitation within any aboveground oil storage tank area?
Yes___ No ___

Does the facility have a total oil storage capacity greater than or equal to 1 million gallons and is the facility located at a distance (as calculated using the appropriate formula in rule 40 CFR 112 Attachment C-III or a comparable formula) such that a discharge from the facility could cause injury to fish and wildlife and sensitive environments? For further description of fish and wildlife and sensitive environments, see Appendices I, II, and III to DOC/NOAA's "Guidance for Facility and Vessel Response Plans: Fish and Wildlife and Sensitive Environments" (see Appendix E to this Part, Section 13, for availability) and the applicable Area Contingency Plan.

Yes___ No ___

Does the facility have a total oil storage capacity greater than or equal to 1 million gallons and is the facility located at a distance (as calculated using the appropriate formula in Attachment C-III to this appendix or a comparable formula) such that a discharge from the facility would shut down public drinking water intake? For the purpose of 40 CFR 112, public drinking water intakes are analogous to public water systems as described in 40 CFR 143.2(c)

Yes___ No ___

Does the facility have a total oil storage capacity greater than or equal to 1 million gallons and has the facility experienced a reportable oil discharge in an amount greater than or equal to 10,000 gallons within the last five years?

Yes___ No ___

Certification

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this document, and that based on my inquiry of those individuals responsible for this information, I believe that the submitted information is true, accurate, and complete.

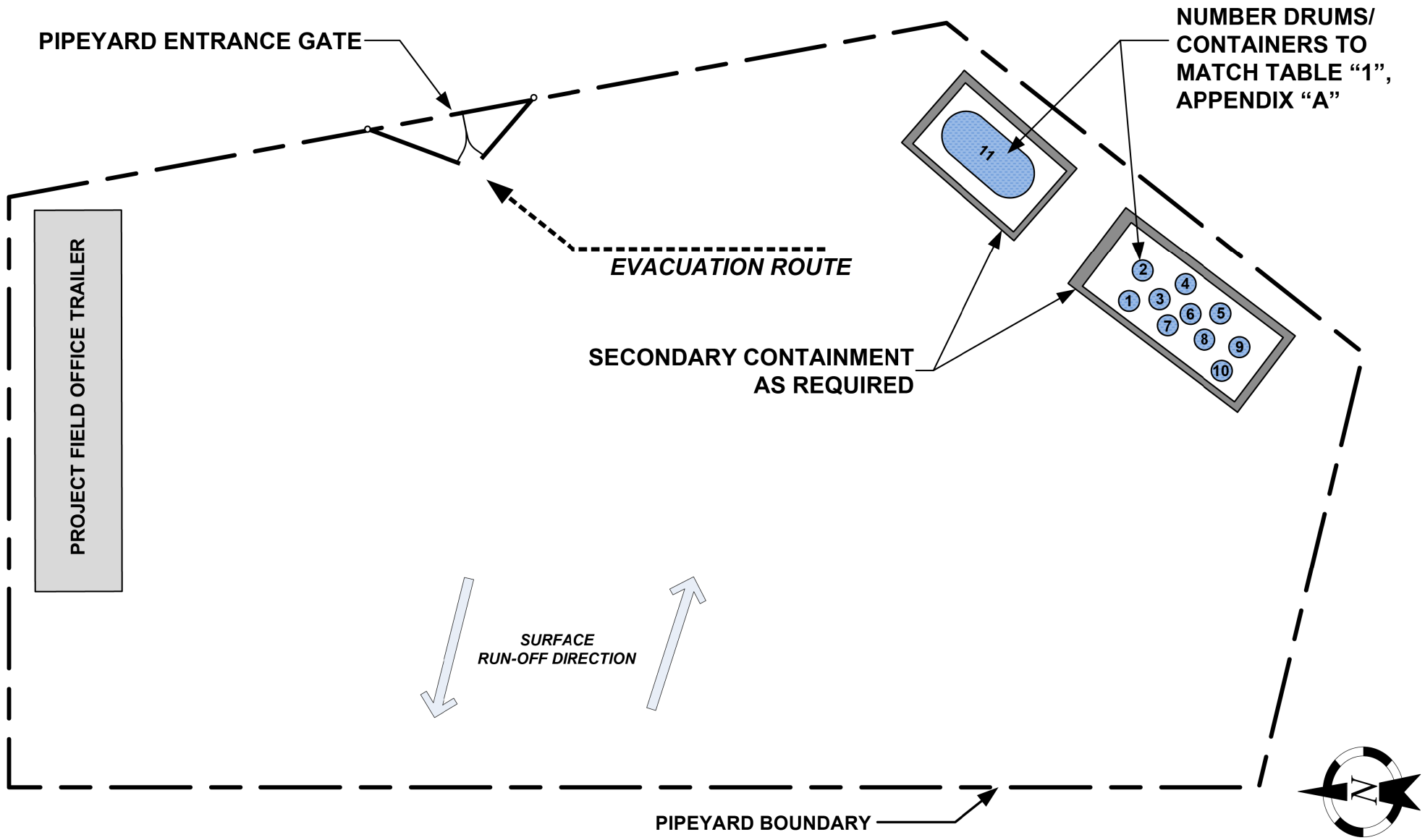
Signature: _____

Title: _____

Name (please type or print): _____

Date: _____

APPENDIX E – PIPEYARD / FACILITY STORAGE DRAWING



LEGEND

PIPEYARD BOUNDARY

STORAGE CONTAINERS

OFFICE TRAILER

SAMPLE
PIPEYARD: FACILITY STORAGE DRAWING

REV.	REV. DATE		REV. APRVD.
CKD.BY	ENG.	DATE 1/6/2011	W.O.
DRN.BY J.M.F.	SCALE NONE	DWG.NO .	

ENBRIDGE

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Houston, TX. 77056-5310
713.627.5400