Resource Report 12

PCB Contamination

Permian Basin Expansion Project

FERC Docket No. CP26-____-000

May 2026

RESOURCE REPORT 12 - PCB CONTAMINATION	
MINIMUM FILING REQUIREMENTS	
INFORMATION	**DATA SOURCE**
1. For projects involving the replacement or abandonment of facilities determined to have polychlorinated biphenyls (PCBs), provide a statement that activities would comply with an approved U.S. Environmental Protection Agency disposal permit or with the requirements of the Toxic Substances Control Act – 18 CFR § 380.12 (n)(1)	Section 12.2
2. For compressor station modification on sites that have been determined to have soils contaminated with PCBs, describe the status of remediation efforts completed to date – 18 CFR § 380.12 (n)(2)	Not applicable

Contents

List of Appendices

Abbreviations and Acronyms

CFR	Code of Federal Regulations
FERC	Federal Energy Regulatory Commission
Northern	Northern Natural Gas Company
PCB	polychlorinated biphenyl
ppm	parts per million
Project	Permian Basin Expansion Project

12.0 PCB CONTAMINATION

Northern Natural Gas Company (Northern) owns and operates a natural gas transmission pipeline system and associated aboveground facilities in New Mexico and Texas. Northern is seeking a Certificate of Public Convenience and Necessity from the Federal Energy Regulatory Commission (FERC) under Section 7(c) of the Natural Gas Act, as amended, for its Permian Basin Expansion Project (Project).

The Project includes constructing approximately 15.1 miles of 24-inch-diameter and 1.1 miles of new 16-inch-diameter pipelines, a new International Organization for Standardization-rated 7,700 horsepower compressor station, one interconnect with Transwestern Pipeline Company, LLC within the existing Phillips 66 Linam Ranch Plant, one bi-directional receiver within Northern's existing launcher facility, replacing a recycle valve at Northern's Plains compressor station, and one new delivery point for the customer at the Gaines County Generating Station.

In accordance with the FERC regulations at 18 Code of Federal Regulations (CFR) 380.12(n), *Resource Report 12 – PCB Contamination* describes the replacement, abandonment by removal, or abandonment in place of pipeline facilities determined to have polychlorinated biphenyls (PCBs) in excess of 50 ppm in pipeline liquids.

12.1 PRESENCE OF PCBS

Since much of Northern's pipeline system was installed prior to the 1980s, there is a potential that the pipelines have PCBs in excess of 50 ppm in pipeline liquids (e.g., lubricants, sealants) associated with facilities being removed.

Northern's pipeline system south of Beatrice, Nebraska has been certified PCB-free under the provisions outlined in the Toxic Substances Control Act regulations (40 CFR 761.60) as established under U.S. Environmental Protection Agency regulations.

In the unlikely event that suspected PCB containing material is encountered during tie-ins with foreign and existing pipelines, Northern will follow its PCB Handling Procedures[1] provided as Appendix 12A and the Toxic Substances Control Act regulations.

12.2 PIPE REMOVAL

All pipe removal and tie-ins will either be within Northern's pipeline that has been certified PCB-free or will be tied into Transwestern at Northern's proposed Transwestern – Lea County interconnect. Northern will install a separator at the interconnect location to remove pipeline liquids prior to gas entering Northern's system.

[1] Northern's PCB Handling Procedures includes PCB Mega Rule Marking Requirements (environmental procedure 410.403), PCB Disposal Requirements (environmental procedure 410.301), and Sampling for PCBs During Pipeline Removal (environmental procedure 410.405).

APPENDIX 12A

Northern's PCB Handling Procedures

- PCB Mega Rule Marking Requirements (environmental procedure 410.403)
- PCB Disposal Requirements (environmental procedure 410.301)
- Sampling for PCBs During Pipeline Removal (environmental procedure 410.405)

1 PURPOSE:

The purpose of this procedure is to ensure all portions of the Northern system subject to the PCB Mega Rule are marked using the PCB marked as required under the PCB regulations.

2 RESPONSIBILITY FOR ADMINISTRATION:

Team, DES or Project Manager

3 GENERAL:

None

4 RELATED PROCEDURES:

EA 410.202 PCB Marking Requirements

5 PROCEDURE:

5.1 Mark all aboveground sources of PCB contamination such as compressors, valves, drips, pipeline liquid tanks, etc. that contain or collect pipeline liquids contaminated with PCBs at levels at or greater than 50 ppm using the Large PCB Mark described in Procedure 410.202 PCB Marking Requirements.

5.2 Underground equipment, including pipe, does not need to be marked.

5.3 All pipe and equipment that is removed from service and has been determined to be contaminated with PCBs at levels at 50 ppm PCBs or 10 ug/100cm^2 or above, must be marked in accordance with Procedure 410.202 PCB Marking Requirements. Use large or small mark depending on the size of the equipment removed.

5.4 As pipe is being removed from service, it must also be marked as follows for the purpose of characterizing the pipeline:

5.4.1 Use a permanent marker

5.4.2 Mark on the external service

5.4.3 Mark on the upstream side of the pipe segment

5.4.4 Mark the joint number

5.4.5 Mark the flow direction using an arrow

5.4.6 Mark the top of the joint by the words “TOP”

5.4.7 Mark where wipe sample was collected, if appropriate with the words “Sample Point.”

6 RECORDS:

None

7 REVISION HISTORY:

Responsibility for Procedure:

Address all questions on this procedure to the director of environmental.

Revisions:

Rev. 3	02/28/04	
Rev. 4	01/01/06	
Rev. 5	11/27/24	Publish Only: Updated the company logo

1 PURPOSE:

The purpose of this procedure is to provide regulatory guidance for transportation and disposal of polychlorinated biphenyl (PCB) wastes off-site in accordance with Environmental Protection Agency (EPA) regulations under the Toxic Substance Control Act (TSCA), 40 CFR Part 761.

2 RESPONSIBILITY FOR ADMINISTRATION:

Operations Manager, Environmental Skill Employees, Division Environmental Specialist (DES) or Project Manager

3 GENERAL:

3.1 The following are the disposal methods available for PCB wastes:

3.1.1 Liquid PCB waste (50 ppm PCBs or greater) must be incinerated at an incinerator approved to accept PCB wastes. Organic liquid PCB waste (e.g., condensate and diesel fuel) that is between 2 and 50 ppm PCBs must be managed as used oil.

3.1.2 PCB contaminated articles, such as pipe and equipment can be disposed of at a municipal landfill, non-hazardous industrial landfill, or scrap metal smelter if it is contaminated at levels less than 500 ppm or 100ug/100cm^2 PCBs. If pipe is less than 4-inches in diameter *and a wipe sample cannot be obtained, the pipe is considered PCB-contaminated at a level of 50 to 500 ppm and disposed of accordingly.* If pipe is 4-inches or greater in diameter and contaminated at levels 500 ppm or greater or 100ug/100cm^2 or greater, the material must be decontaminated before it can be disposed of at a municipal landfill, industrial landfill, or scrap smelter. It can be disposed of at a chemical waste landfill if drained of all free flowing liquids without decontamination. (Per environmental procedure 410.401, *Sampling and Recordkeeping for PCBs*, a wipe template is 10cm x 10cm, which equals 100cm^2.)

4 RELATED PROCEDURES:

OP 110.420	Motor Carrier Safety
EA 390.106	Manifesting and Other Transport Requirements for Off-Site Disposal
EA 410.101	PCB Storage and On-site Handling
EA 410.202	Marking Requirements
*EA 410.401	Sampling and Recordkeeping for PCBs*

5 PROCEDURE:

5.1 Package PCB wastes or material in a secure, non-leaking, Department of Transportation (DOT) approved containers or in a manner approved under the DOT regulations. See environmental procedure 410.101, Storage and On-site Handling, for packaging requirements and/or consult with the safety department.

5.2 Determine the type of facility at which the PCB waste will be disposed using the information in the General section above. Contact the DES for guidance and information on available disposal facilities.

5.3 For PCB wastes that fill more than ½ of a gondola, contact the DES directly to determine arrangements for disposal.

5.4 Prior to offering the PCB waste for transport to a disposal facility, prepare a hazardous waste manifest in accordance with the instructions located in section 9 of this manual and include the additional information set out below:

5.4.1 For each bulk load of PCBs: The identity of the PCB waste, the earliest date of removal from service for disposal, and the weight in kilograms of the PCB waste.

5.4.2 For each PCB article container or PCB container: The unique identifying number of the container, the type of waste (e.g., soil, debris, small capacitors), the earliest date of removal from service for disposal, and the weight in kilograms of the PCB waste. (Note: Each PCB article within a PCB article container does not require a unique identifying number.)

5.4.3 For each PCB article not in a PCB container or PCB article container: The serial number, if available, or other method of unique identification, the date of removal from service for disposal, and the weight in kilograms of the PCB waste in each PCB Article.

5.5 Label each container to be shipped offsite in accordance with DOT and TSCA requirements as follows:

5.5.1 DOT substance or waste by name and UN or NA identification number, (e.g., Polychlorinated Biphenyls UN2315).

5.5.2 TSCA PCB sticker. Refer to environmental procedure 410.202, Marking Requirements.

5.6 If the Northern Natural Gas (Northern) facility uses an independent transporter to transport the PCB waste to a commercial storer or disposer, the facility shall confirm by telephone, or by other means of confirmation agreed to by both parties, that the commercial storer or disposer actually received the manifested waste in the following manner:

5.6.1 The Northern facility shall confirm receipt of the waste by close of business the day after it receives the manifest hand-signed by the commercial storer or disposer.

5.6.2 If the Northern facility has not received the hand-signed manifest within 35 days after the independent transporter accepted the PCB waste, the facility shall telephone, or communicate with by some other agreed-upon means, the disposer or commercial storer to determine whether the PCB waste was actually received. If the PCB waste was not received, the facility shall contact the independent transporter to determine the disposition of the PCB waste.

5.6.3 If the Northern facility does not receive a hand-signed manifest from an EPA-approved facility within 10 days from the date of the telephone call or other agreed upon means of communication, to the independent transporter, the facility must submit an “exception report” to the EPA. See environmental procedure 390.106, Manifesting and Other Transport Requirements for Off-Site Disposal.

5.6.4 If the Northern facility is required to keep an Annual Document Log, all telephone conversations must be recorded in that document. See environmental procedure 410.101, PCB Storage and On-site Handling.

5.7 PCBs must be disposed of within 1 year of the date that they were removed from service and placed in a storage area. Always ship PCB waste to an off-site disposal location at least 90 days before the 1 year time period will elapse.

5.8 If an independent transporter is used, contact the commercial facility by telephone when the signed copy of the manifest is received to confirm the waste material was received by the commercial facility. If the waste was not received by the commercial facility, contact the DES.

5.9 The disposal facility is required to prepare and submit to the generating facility a "Certificate of Disposal" within 30 days of disposal so that the facility can verify that the waste was disposed within the 1 year time limit. Contact the disposal facility if the Certificate of Disposal is not received in a timely manner.

6 RECORDS:

6.1 Submit shipping manifests and Certificates of Disposal to the company's records management system. Use the category, PCB DISPOSAL on the Document Submittal Form. These records will be kept for the life of the facility.

7 CHANGE MANAGEMENT:

Responsibility for Procedure:

Address all questions on this procedure to the *director of environmental affairs*.

Revision History:

Rev. 3	02/28/04	
Rev. 4	01/01/06	
Rev. 5	10/13/11	Corrected denominators in section 3.1.2. Added section 5.3 to contact the DES for disposal options if PCB wastes fill more than ½ of a gondola.
Rev. 6	07/31/12	Updated the Related Procedures section and added detail stating that if the pipe is less than 4-inches in diameter and a wipe sample cannot be obtained, the pipe is considered PCB-contaminated at a level of 50 to 500 ppm and disposed of accordingly.

1 PURPOSE:

The purpose of this procedure is to ensure all portions of the Northern system, subject to the PCB Mega Rule, comply with the regulations when pipe is removed from the system for reuse or disposal.

2 RESPONSIBILITY FOR ADMINISTRATION:

Team Leader, Environmental Skilled Person, DES, Project Manager and Construction Coordinator

3 GENERAL:

None

4 RELATED PROCEDURES:

EA 410.401	Sampling for PCBs
EA 410.403	PCB Mega Rule Marking Requirements
EA 410.101	Storage an On-Site Handling
EA 410.408	Storage for Reuse
EA 470.101	Sale and Purchase of Used Material

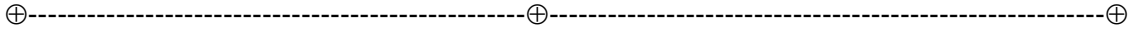
5 PROCEDURE:

5.1 Prior to removal of pipe, characterization of the pipe to determine PCB contamination may be required. All coal tar based coatings must be sampled for the presence of PCBs prior to removal or disposal. Follow environmental procedure 410.401, Sampling for PCBs.

5.2 If pipe is less than 4-inches in diameter, no sampling is required if the pipe is to be reused within the system or destined for disposal. If the pipe is to be used in another manner (e.g., sold) refer to environmental procedure 470.101, Sale and Purchase of Used Materials.

5.3 If the pipe is greater than 4-inches in diameter and still in service, collect liquid samples in accordance with environmental procedure 410.401, Sampling for PCBs from all condensate collection points along the portion of the pipeline to be abandoned. Collection points include compressors, filters, scrubbers, drips and tanks. Sampling must occur within 72 hours of the last transmission of gas. If no liquid samples can be collected due to lack of liquids in that portion of the system or sampling did not occur within 72 hours of the last transmission of gas, the wipe samples must be collected at the time of removal. If liquids are present, the line must be characterized based on collection of liquid samples.

5.4 Results should be evaluated by reviewing one upstream sample point to the next downstream sample point. The PCB concentration of the entire pipeline system between those two sampling points is assumed to be the concentration of the upstream sample point. For example, as to points A, B, and C below the results should be interpreted as follows:



A	B	C
Greater than 50 ppm	Less than 50 ppm	Greater than 50 ppm

5.5 The segment between A and B is contaminated at levels greater than 50 ppm PCBs.

5.6 The segment between B and C is contaminated at levels less than 50 ppm PCBs.

5.7 If only one sample is collected, the entire segment to be removed must be characterized based on the results of that sample.

5.8 If liquid samples cannot be collected, then the pipeline section to be removed must be wipe sampled as per environmental procedure 410.401, Sampling for PCBs.

5.9 Wipe samples must be collected as follows (joint = 40 ft. of pipe):

5.9.1 If fewer than seven joints are removed, every joint shall be sampled.

5.9.2 If seven joints or more are to be removed, sample sites shall be selected depending on the total length of pipeline to be removed. If the total contiguous length (L) of the pipeline to be removed:

5.9.2.1 If less than 3 miles (15,840 ft.), take one sample at the first upstream end joint and one sample at the last joint removed then select five more samples as follows. Assign a unique number to each joint, including the first and last joint. Divide the total number of joints by 6 (Total number/6 = S). Round result to the nearest whole number. In addition to sampling the first segment and last segment, also collect samples at segments 1+S, 1+2S, 1+3S, 1+4S, and 1+ 5S. See the attached example.

5.9.2.2 If greater 3 miles (15840 ft.), then take first sample from upstream end of first joint and then collect samples from every 1/2 mile of pipe until entire length of pipe is sampled. See the attached example.

5.10 Mark joints removed for reuse or disposal in accordance with environmental procedure, 410.403 - PCB Mega Rule Marking Requirements.

5.11 Store joints destined for disposal or reuse within the system in accordance with environmental procedure 410.202, Storage and On-site Handling.

5.12 Pipe that is less than 4 inches in diameter can be reused within the system or disposed of in a municipal landfill, industrial non hazardous waste landfill, hazardous waste landfill, or other TSCA disposal facility only after discussion with the DES. The material can also be sent to an authorized scrap metal smelter, refer to environmental procedure 470.101, Sale and Purchase of Used Materials. All free-flowing liquids must be removed.

5.13 Pipe that is greater than 4-inches in diameter and contaminated at levels less than 500 ppm PCBs or 100 ug/cm^2 can be reused within the system or disposed of in a municipal landfill, industrial non hazardous waste landfill, hazardous waste landfill, or other TSCA disposal facility. The material can also be sent to an authorized scrap metal smelter, refer to environmental procedure 470.101, Sale and Purchase of Used Materials. All free-flowing liquids must be removed.

5.14 Pipe that is greater than 4-inches in diameter and contaminated at levels greater than 500 ppm or 100 ug/cm^2 PCBs, must be decontaminated before it can be reused within the system or disposed in a municipal or industrial landfill. Contact the DES for options.

5.15 All coal tar based coatings contaminated at levels greater than 50 ppm must be removed before the pipe can be reused within the system. When the sale of used equipment is contemplated refer to environmental procedure 470.101, Sale and Purchase of Used Materials.

6 RECORDS:

6.1 Documentation of the abandonment process will be kept with the project file.

7 CHANGE MANAGEMENT:

Responsibility for Procedure:

Address all questions on this procedure to the Senior Director of Environmental Affairs, Pipeline Safety and Right of Way.

Revision History:

Rev. 3 02/28/04
Rev. 4 01/01/06
Rev. 5 02/28/08