

**TENNESSEE GAS PIPELINE COMPANY
COMMONWEALTH OF MASSACHUSETTS
2011 YEARLY OPERATIONAL PLAN**

Submitted by:
Tennessee Gas Pipeline Company

Prepared By:
 Vegetation Control Service, Inc.

Submitted: April 29, 2011

SUMMARY

In compliance with the Massachusetts Department of Agricultural Resources' Rights-of-Way Regulations (333 CMR 11.00), this Yearly Operational Plan (YOP) informs municipalities of Tennessee Gas Pipeline Company's (Tennessee) intent to utilize state recommended herbicides on electric rights-of-way (ROW) in 2011.

The application of herbicides will be carried out within the specifications of our Integrated Vegetation Management program, outlined in our five year Vegetation Management Plan.

This YOP identifies target vegetation; the affected rights-of-way and towns; the herbicides, rates and methods of application; alternative control methods; the individual responsible for supervising the YOP, and the qualified contractors that will perform the application. It explains how sensitive areas; buffer zones and sites where herbicides are either restricted or not permitted are identified, appropriately marked, treated and protected. It addresses procedures for the mixing, handling and loading of herbicide concentrates. Finally, it includes Herbicide Fact Sheets and Labels, a list of emergency resources and telephone numbers, and maps marked with known *Sensitive Areas*.

The YOP process provides for a forty-five day public review and comment period, in conjunction with the twenty-one day municipal Rights-of-Way notification period. These review periods give communities an opportunity to provide information that will help identify additional areas that may require specific precautions or protection. Notice will also be published in general circulation newspapers at least 48 hours before the scheduled application.

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THE INDIVIDUAL RESPONSIBLE FOR SUPERVISING THE YOP:

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SECTION 1: INTRODUCTION

To manage vegetation on its natural gas pipelines system under an IVM program in the Commonwealth of Massachusetts, Tennessee Gas Pipeline Company (Tennessee), part of El Paso Corporation's Eastern Pipeline Group, hereby submits this 2011 Yearly Operational Plan in compliance with 333 CMR 11.00, *Rights of Way Management* regulations; Chapter 132B, *Pesticide Control Act*; all pertinent clauses in *Chapter 85 of the Acts of 2000*; MGL c.131, *Massachusetts Endangered Species Act* and its regulations, 321 CMR 10.00, *Massachusetts Endangered Species Regulations*; 310 CMR 10.00, *Wetlands Protection* regulations and 310 CMR 22.00, *Drinking Water* regulations of the Massachusetts Department of Environmental Protection.

Tennessee must also comply with all applicable federal regulations including, but not limited to *The Endangered Species Act*; *The Migratory Bird Treaty Act*; *The Federal Natural Gas Act*, 15 U.S.C. §§ 717 *et seq.*; the *Federal Natural Gas Pipeline Safety Act*, 49 USC §§ 60101 *et seq.*; the *Federal Hazardous Materials Transportation Act*, 49 CFR, Part 192; all applicable Federal Energy Regulatory Commission (FERC) standards, Federal *Occupational Safety and Health Act* (OSHA) regulations, and Department of Environmental Protection (EPA) regulations.

The YOP details Tennessee's plans for 2011 and is a companion document to the *Tennessee Gas Pipeline Company Commonwealth of Massachusetts Five-Year Vegetation Management Plan, 2011-2015* (VMP) which may be viewed at the following location:

<http://www.tennesseeadvantage.com/EnvironmentalProjectNotifications.asp>

The VMP details Tennessee's Integrated Vegetation Management Program (IVM) which takes into consideration all factors involved in the maintenance and operation of pipeline ROWs and unfenced equipment. Both the VMP and the YOP reflect Tennessee's intent to prevent any unreasonable adverse effects to the environment and to the safety and health of animals and humans while supporting Tennessee's primary obligation of delivering natural gas. As defined in the VMP, the IVM program supports this goal by combining mechanical, chemical and natural controls.

Tennessee, has over 500 miles of high-pressure natural gas pipeline and associated equipment in the Commonwealth of Massachusetts. It maintains its pipeline in easements ranging from twenty feet in width on its laterals and up to 120 feet in areas of multiple pipelines. To maintain regulatory compliance, these pipeline rights-of-way (ROWs) need to be kept clear of all but low vegetation, therefore, in 2011,

three ROWs are scheduled for IVM treatments. These are listed below, and are illustrated on the maps in Appendix 1, along with a list of the twelve affected municipalities:

1. Blackstone Laterals – 266A-100 and 266A-102A (same easement) & TGP 266B-200 (tap)
2. Rhode Island Lateral – 265E-100
3. Worcester Delivery 265A-100 and 265A-200 (same easement)

In addition, throughout Tennessee's New England system—not just on the three IVM ROWs—Tennessee personnel must maintain cathodic protection installations and appurtenances including rectifiers, magnesium groundbeds and test stations along the buried steel pipelines. The plant communities around many of these installations and appurtenances tend to be dominated by noxious weeds, particularly poison ivy, and other plants that impede access to the equipment for maintenance and emergencies. Since it has been Tennessee's experience that mechanical methods do not reduce the spread of these plants, Tennessee contracts herbicide spot treatments at sites identified by operations personnel as having a high risk of exposure (See Appendix 2 for maps and municipality list).

The YOP provides guidance for both Tennessee and contract personnel and serves as a communication link for state and municipal officials, property owners, abutters and the public-at-large. This objective will be accomplished through the VMP, YOP, appropriate notification documentation and procedures, and with professionalism and courtesy on the part of Tennessee and contract field personnel.

SECTION 2: REGULATIONS AND NOTIFICATION

As a natural gas pipeline company, Tennessee must comply with a large number of federal laws and regulations. The objective of a number of detailed environmental protection regulations in Massachusetts also serve as guides in the proper implementation of annual IVM programs. All Tennessee and contractor personnel involved in the 2011 IVM program, must, therefore, be familiar with how these various regulations affect their actions.

To aid municipal officials, property owners, abutters and the public-at-large, this section is a short discussion of the two primary Massachusetts legal documents, Chapter 132B and 333 CMR 11.00 (both of which may be found in the VMP) that guide IVM, along with the additional voluntary notification that Tennessee will perform before implementing the 2011 IVM program.

The establishment of Chapter 132B created a clear and uniform set of standards for the entire Commonwealth of Massachusetts *in order to protect the public from the negative impacts that arise from fragmented, decentralized, sets of standards*. In this effort, the Commonwealth, through the Department of Agricultural Resources (DAR) retains the sole right to regulate the use of pesticides, including herbicides, throughout Massachusetts. DAR takes this responsibility extremely seriously and the regulations promulgated from Chapter 132B are stricter than Federal EPA standards.

333 CMR 11.00 is the most comprehensive rights of way regulation in New England. It requires an Integrated Pest Management (in this case IVM) approach to ROW vegetation management; the establishment of standards and procedures to prevent unreasonable risks to humans or the environment, and a multi-layered system of public and municipal notification that requests input about environmentally and culturally sensitive areas. All of this is outlined in Tennessee's VMP, annual YOPs, *The Environmental Monitor* notice, 21 day notification, Public Water Supplier notification and 48 hour newspaper notice.

Tennessee also voluntarily notifies landowners (includes houses and businesses that are within 300 feet of the ROWs treated in that year) before treatments begin. Tennessee will mail out a notification letter to landowners with instructions to call the listed offices for additional information, questions or concerns, including the identification of private wells. Treatment contractors will also leave door hangers or talk personally with landowners, which allow the contractor to answer site specific questions, identify private wells and help explain the program (See Appendix 3).

SECTION 3: TARGET VEGETATION

To stay in compliance with various federal codes of regulations, Tennessee's goal is to establish stable, predominately grass or forbs plant communities along the ROW by the management and removal of undesirable vegetation types ("target vegetation"). Most woody vegetation and noxious vegetation—invasive and poisonous plant species—interfere with the safe, efficient and regulatory compliant operation of a pipeline.

The primary target vegetation on Tennessee's ROWs includes, but is not limited to:

1. **Trees** such as Aspen, Beech, Birch, Cherry, Maples, Oak and Pines
2. **Shrubs** such as Dogwood, High Bush Blueberry, Mountain Laurel, Speckled Alder, Sumac, Viburnum and Witch Hazel
3. **Woody vines and other vegetation** such as Virginia Creeper, Greenbrier, wild grapes and blackberries
4. **Invasive plant species** such as Oriental Bittersweet, Japanese Knotweed, Multiflora Rose, Autumn Olive, Buckthorn, Honeysuckle, Purple Loosestrife and Phragmites
5. **Poisonous plant species** such as Poison Ivy, Poison Sumac, Poison Oak and Giant Hogweed.

Very low growing woody and herbaceous plants, grasses and forbs that compete with taller woody vegetation do not generally interfere with the functioning of the pipeline. At the same time, these early successional ecological communities are excellent wildlife habitat for many plant, mammal, bird, reptile, amphibian and invertebrate species, including a number of Federal and/or State-listed rare, endangered or threatened species. A partial list of compatible early successional plant species includes, but is not limited to, Low-bush Blueberry, Huckleberry, Sweet fern, grasses, ferns and wildflowers.

SECTION 4: VEGETATION MANAGEMENT METHODS

The following is a short descriptive listing of Tennessee's intended vegetation management methods detailing the individual techniques available. The goal is to achieve a long term, low maintenance IVM program (A more detailed description is included in the VMP). The treatment methods used on any given ROW are based on site sensitivity, regulatory mandates, target species composition, density and height, site access and topography.

CHEMICAL (HERBICIDE) CONTROL METHODS:

Chemical control methods—foliar, basal and CST—consist of herbicides applied as mixtures consisting of herbicide(s), adjuvants, carriers and additives.

The following guidelines are observed in all herbicide applications:

1. Herbicide applications follow all restrictions in 333 CMR 11.00
2. Herbicide applications follow all *sensitive area* restrictions in 333 CMR 11.04
3. Foliar herbicide applications are not applied to targets over 12 feet in height
4. Foliar treatments are allowed in wetland areas where no standing water is present, as per the Department of Food and Agriculture *Decision Concerning the Wetland Impact Study Conducted Pursuant to 333 CMR 11.04 (4)(C)(2)*, dated October, 1995.
5. All herbicide applications are performed by experienced, trained vegetation management personnel with Massachusetts pesticide applicator licenses working under the direct supervision of a certified pesticide applicator.

Low Volume Backpack Foliar Techniques utilize hand-operated pumps or motorized, backpack sprayers that deliver the herbicide mixture in small droplets from three to five gallon spray tank to the target vegetation. Both techniques only require the applicator to dampen or lightly wet the target leaf area not to the point of runoff.

Vehicle Mounted Techniques generally utilizes a 100-500 gallon hydraulic sprayer mounted on a truck, tractor or tracked vehicle equipped with hand-held spray guns. The herbicide mixture is directed at selective vegetation or broadcast for uniform coverage. Specially designed showerhead type nozzles deliver effective spray coverage at relatively low spray pressures of sixty psi and less.

CUT STUMP SURFACE TREATMENTS: The application of an herbicide mixture directly to the cut surface of a stump immediately following or during a cutting operation to prevent resprouts and root suckering. Application equipment includes hand-pump backpack sprayers; hand held squirt bottles; paintbrushes, or sponge applicators.

LOW VOLUME BASAL TREATMENT: the selective application of an herbicide diluted in specially formulated oil using a hand pump backpack sprayer to wet the entire lower twelve to eighteen inches of the main stem of target plants.

ALTERNATIVE MECHANICAL METHODS:

Mechanical control methods include mowing, hand cutting and side trimming. These methods are used to maintain the edge of the ROW; remove hazard trees; remove or control target vegetation greater than twelve feet in height, in areas of dense vegetation and to protect environmentally and culturally sensitive areas particularly where herbicide use is prohibited or not appropriate for the site.

HAND CUTTING: the use of chain and brush saws to remove the stem and/or branches from the plant's root system. Hand cutting is used in preparation for herbicide applications and on sites where terrain, target species size or sensitivity renders mowing impossible or impractical.

MOWING: the cutting, severing or shattering of vegetation by large rotary or flail mowers.

SIDE TRIMMING: the side trimming or removal of encroaching tops and/or branches of trees growing on or near the ROW which may cause a hazard, hamper access and/or impede visual inspections. This management technique is usually accomplished by the use of an aerial lift mounted on a street or off-road vehicle, although, tree climbing is sometimes employed in situations where terrain prevents the passage of equipment.

SECTION 5 PROPOSED HERBICIDES, CARRIERS, ADJUVANTS, RATES AND GENERAL INFORMATION

Beyond regulatory requirements, Tennessee only approves the use of herbicides from the *Herbicides Recommended for Use in Sensitive Areas List (Sensitive Area Materials List)*. Licensed and/or certified applicators will only apply these herbicides in compliance with all labeled directions.

All herbicides will be handled, mixed and applied strictly according to *Label Instructions* and in compliance with all applicable federal and state laws and regulations. All herbicide mixing should be done at the contractor's facilities and extreme care shall be exercised during all mixing, handling and loading to prevent careless spills or splashes. No herbicide concentrates will be mixed, handled or loaded on a ROW within one hundred (100) feet of a Sensitive Area.

For more information on the herbicides listed below, Commonwealth of Massachusetts Herbicide Fact Sheets and Manufacturer's Labels are included in Appendices 4 and 5, respectively.

Table 1. Tank Mixes for Low Volume Foliar Applications:

Herbicides & Adjuvants	Active Ingredient	EPA Registration Number(s)	Mix Concentration (Carrier: Water)	Estimated Application Rate Per Acre
Accord Concentrate or Rodeo	Glyphosate	62719-324	3-5%	16-128 oz.
Krenite S	Fosamine	352-395	6-10%	32-128 oz.
Escort XP	Metsulfuron-Methyl	352-439	2-4 oz.	0.125-0.8 oz.
Arsenal, Arsenal Powerline or Polaris ¹	Imazapyr	241-346, 241-431 or 241-346-228	0.125%-.5%	2-8 oz.
Induce, Clean Cut, or Aqua Fac or equivalent surfactant ²	n.a. ³	n.a.	0.125%-1%	1-16 oz.
Point Blank, Stay Put Plus or equivalent anti-drift adjuvant	n.a.	n.a.	6-64 oz.	1-2 oz.

Table 2. Tank Mix for Cut Surface Treatment (CST) Applications:

Herbicides & Adjuvants	Active Ingredient	EPA Registration Number(s)	Mix Concentration (Carrier: Water)	Estimated Application Rate Per Acre
Accord Concentrate or Rodeo	Glyphosate	62719-324	40% to 50%	Per density of target stems
Arsenal, Arsenal Powerline or Polaris	Imazapyr	241-346, 241-431 or 241-346-228	3%-5% (mixed with Accord Concentrate)	Per density of target stems

¹Imazapyr will not be applied on the same right-of-way in two consecutive years.

²Equivalent surfactants, drift retardants and basal oils will only be used in case those listed are no longer available or more effective alternatives become available.

³ n.a.—not applicable

Table 3: Tank Mix for Poison Ivy, Noxious and Invasive Species

Herbicides & Adjuvants	Active Ingredient	EPA Registration Number(s)	Mix Concentration (per 100 gals. water)
Accord Concentrate or Rodeo	Glyphosate	62719-324	2-5%
Escort XP	Metsulfuron-Methyl		1.25-4 z
Induce, Clean Cut, or equivalent surfactant	not applicable	n.a.	0.125%-1%
Point Blank, Stay Put Plus or equivalent anti-drift adjuvant	n.a.	n.a.	4-16 oz.
Carrier: Water	n.a.	n.a.	n.a.

Table 4: Alternate Tank Mix for Poison Ivy, Noxious and Invasive Species

Herbicides & Adjuvants	Active Ingredient	EPA Registration Number(s)	Mix Concentration (per 100 gals. water)
Garlon 4 or Garlon 4 Ultra	Triclopyr	62719-40 or 62719-527	2-4%
Induce, Clean Cut, or equivalent surfactant	n.a.	n.a.	0.125%-1%
Point Blank, Stay Put Plus or equivalent anti-drift adjuvant	n.a.	n.a.	4-16 oz.

Note: Anti-drift Adjuvants are added to the mix or solution in foliage applications to reduce potential exposures to non-target organisms, reduce the break-up of sprays into fine droplets and increase selectivity and herbicide deposition onto target plants.

SECTION 6: THE COMPANIES THAT WILL PERFORM THE HERBICIDE TREATMENT

Vegetation Control Service, Inc.
 2342 Main Street
 Athol, MA 01331
 (978) 249-5348

NaturChem, Inc.
 1029 Brompton Lane
 Greenville, NC 27834
 (252) 355-1002

SECTION 7: SENSITIVE AREA IDENTIFICATION AND PROPOSED CONTROL STRATEGIES

Per 333 CMR 11.02, *sensitive areas* are "any areas within rights-of-way...in which public health, environmental or agricultural concerns warrant special protection to further minimize risks of unreasonable adverse effects.

Sensitive areas consist of no-spray areas in which herbicide use is prohibited, limited spray areas where herbicide use is permitted under certain conditions, and areas that require special treatment recommendations. Protecting these environmentally and culturally sensitive sites is accomplished by establishing treatment prescriptions based on the sensitivity of each site and the requirement to minimize any unreasonable adverse impacts within that area (See Table 5).

Only herbicides from the *Sensitive Area Materials List*—pursuant to 333 CMR 11.04 (1)(d)—will be applied in limited spray areas according to the application restrictions in 333 CMR 11.04 or in the case of the Priority Habitat of state-listed species, approval of the YOP by the Natural Heritage and Endangered Species Program of the Massachusetts Department of Fisheries and Wildlife (NHESP).

Above and beyond the regulation, Tennessee's policy is to use herbicide on the *Sensitive Areas Materials List* on their entire ROW system in Massachusetts, which besides the general environmental benefits of this policy, further protects limited spray *sensitive areas*.

IDENTIFICATION OF SENSITIVE AREAS

Sensitive areas can be divided into two categories that help the individuals assigned the task of identifying and treating them in the field: "readily identifiable in the field" and "not readily identifiable in the field." Readily identifiable in the field areas will be treated, identified and when appropriate, marked according to all applicable restrictions listed in 333 CMR 11.00. Not readily identifiable in the field areas will likewise be treated and marked when appropriate, but they are identified by the use of data marked on maps and collected in the YOP and notification processes.

As appropriate, therefore, *sensitive areas* will be identified and marked in the field by either trained and experienced Tennessee and/or vegetation management contractor personnel, and/or by individuals trained in the identification of *sensitive areas* using the complete list of resources detailed in the VMP that includes:

1. Tennessee's pipeline alignment sheets, maps, records and institutional knowledge
2. Massachusetts Department of Environmental Protection water supply GIS mapping layers
3. Information from municipalities and abutters on private wells
4. Municipality and abutter correspondence, meetings and input, including information from the notification process
5. USGS topographical maps
6. Confidential information from NHESP

CONTROL STRATEGIES FOR SENSITIVE AREAS:

Mandated *sensitive areas* will be treated following the restrictions and appropriate recommendations in all applicable state and federal regulations. Tennessee also reserves the right to designate additional areas as sensitive that require special treatment considerations including, but not limited to landowner agreements, original agreements from the construction permitting process, visual or environmental impact considerations, and other considerations that arise during the treatment cycles.

TABLE 5: CONTROL STRATEGIES FOR SENSITIVE AREAS

<i>Sensitive Area</i>	No-Spray and Limited Spray Areas (feet)	Control Method	Restriction Code
Public Ground Water Supplies	400'	Mechanical Only	None
Primary Recharge Area	Designated buffer zone or 1/2 mile radius	Mechanical, Recommended Herbicides*	24 months
Public Surface Water Supplies (Class A & Class B)	100'	Mechanical Only	None
	100'-400'	Recommended Herbicides	24 months
Tributary to Class A Water Source, within 400' upstream of water source	100'	Mechanical Only	None
	100'-400'	Recommended Herbicides	24 months
Tributary to Class A Water Source, greater than 400' upstream of water source	10'	Mechanical Only	None
	10'-200'	Recommended Herbicides	24 months
Class B Drinking Water Intake, within 400' upstream of intake	100'	Mechanical Only	None
	100'-200'	Recommended Herbicides	24 months
Private Drinking Water Supplies	50'	Mechanical Only	None
	50'-100'	Recommended Herbicides	24 months
Surface Waters	10'	Mechanical Only	None
	10'-100'	Recommended Herbicides	12 months
Rivers	10' from mean annual high water line	Mechanical Only	None
	10'-200'	Recommended Herbicides	12 months
Wetlands	100' (treatment in wetlands permitted up to 10' of standing water)* [†]	Low-pressure Foliar, CST, Basal Recommended Herbicides	12 months
Inhabited Areas	100'	Recommended Herbicides	12 months
Agricultural Area (Crops, Fruits, Pastures)	100'	Recommended Herbicides	12 months
Certified Vernal Pools	10'	Mechanical Only when water is present	None
Certified Vernal Pool Habitat	10'-outer boundary of habitat	No treatment without written approval per 321 CMR 10.14(12)	
Priority Habitat	No treatment without written approval per 321 CMR 10.14(12)		

Restrictions "24 Months": A minimum of twenty-four months shall elapse between applications

"12 Months": A minimum of twelve months shall elapse between applications

*Massachusetts recommended herbicides for sensitive sites

[†]Per "DFA Decision Concerning the Wetlands Impact Study"

Wetlands

Pursuant to 333 CMR 11.04 (4) (c) (2), based upon the results of two ROW, Wetland impact studies, the Massachusetts Department of Agriculture in consultation with the Massachusetts Department of Environmental Protection and the VMP Advisory Panel, made a determination that herbicides, when used under the guidance of an IVM program and other conditions as set forth in the determination, have less impact on wetlands than mechanical only techniques. Therefore in accordance with the conditions of the Department's determination, Tennessee will selectively apply herbicides to wetland sites, except within ten feet of standing and flowing water and to conifers which will be cut.

Public and Private Water Supplies

Appropriate sources and references will be consulted to determine the location of public and private water supplies. Tennessee's permanent records and YOP maps will include all known public and private water supplies at the time of printing. The information used by contractors will be updated as necessary during the treatment cycle.

Under 333 CMR 11.01(3), Tennessee requests that during the notification processes and during the treatment cycle, that public and municipal agencies share information on unidentified or new public and private water supplies.

Landowners are encouraged to post signs on the edge of the ROW to help identify private water supplies (the no-spray treatment area is fifty feet from a private well).

Massachusetts Endangered Species Act

To comply with 321 CMR 10.14, Massachusetts Endangered Species Act Regulations, Part II Exemptions and 333 CMR 11.04(3)(a-c), Tennessee will submit this YOP to the NHESP. Under the approval process, details about state-listed species that might be affected by our activities and management recommendations are shared with Tennessee under strict confidentiality agreements. Using this data and best management practices, Tennessee and contract personnel will follow the appropriate vegetation management treatment methods within these *sensitive areas*.

To identify Priority Habitats, Tennessee personnel, NHESP approved review botanists and vegetation management crews must use proper identification procedures. Contractors are, therefore, required to train their personnel to recognize the location of state-listed species.

SECTION 9: REMEDIAL SPILL AND EMERGENCY PLAN

This section is offered as a general procedural guide for responding to chemical spills or related accidents (related accidents include but are not limited to fire, poisoning and vehicle accidents). Tennessee contracts with independent, professional, certified herbicide applicators that are responsible for the containment, clean up and reporting of chemical spills or accidents. However, this section is a guide to the items that *shall be* available to the treatment crew in the event of a chemical spill or emergency:

Types of Chemical Spills that Require Action

Chemicals include, but are not limited to the following:

- Herbicides
- Bar and Chain Oil
- Motor and Hydraulic Oil/Fluids
- Diesel Fuel
- Gasoline
- Title 3 Hazmat Materials

Required Spill Response Equipment

As a minimum, the treatment crew should have available on the job site:

- YOP with Emergency Contact List
- Material Safety Data Sheets(MSDS)
- Product Label
- Product Fact Sheets (when applicable)
- Appropriate absorbent material
- Shovel
- Broom
- Flagging
- Leak Proof Container
- Heavy-duty Plastic Bags

Personal Contact

In the event of **Personal Contact** with hazardous chemicals:

1. Wash affected area with plenty of soap and water
2. Change clothing which has absorbed hazardous chemicals
3. If necessary, contact a physician
4. If necessary, contact the proper emergency services
5. If necessary, follow the procedures for Major or Minor Spills as outlined below
6. Avoid breathing the fumes of hazardous chemicals.

Clean-up Procedures

Education and attention will constantly be directed at accident and spill prevention, however, in the event of an unfortunate incident, a spill response check list as a guide that will be included in the YOP's.

Reference Tables (information subject to change as necessary)

Table 6: Herbicide Manufacturers

MANUFACTURER	TELEPHONE NUMBER	SPECIAL INSTRUCTIONS
BASF Corporation	(800) 832-4357	
Dow Agro Sciences	(800) 992-5994	
E.I. du Pont de Nemours and Co.	(800) 441-3637	Medical Emergencies
Monsanto	(314) 694-4000	
NuFarm	(877) 325-1840	Medical Emergencies

Table 7: State Agencies

STATE AGENCY	TELEPHONE NUMBER	SPECIAL INSTRUCTIONS
MDAR, Pesticide Bureau	(617) 626-1700	A.S.A.P. (within 48 hours)
Massachusetts Department of Environmental Protection, Emergency Response Section	Main Office: (888) 304-1133	For emergencies involving reportable quantities of hazardous materials, call within 2 hours. Required info: City/town, street address, site name (if applicable), material, quantity released, environment impacted
	Southeast Region: (508) 946-2700	
	Northeast Region: (978) 694-3200	
	Central Region: (508) 792-7650	
	Western Region: (413) 784-1100	
Massachusetts Poison Information Centers	800-682-9211	For medical emergencies involving suspected or known pesticide poisoning symptoms

Table 8: Emergency Services

EMERGENCY SERVICE	TELEPHONE NUMBER	SPECIAL INSTRUCTIONS
Massachusetts State Police	(508) 820-2121	Framingham, after hours number
Local Police/Fire Dept.	911	
ChemTrec	(800) 424-9300	
Clean Harbors	(800) OIL-TANK	
Pesticide Hotline	(800) 858-7378	PST: 6:30 am-4:30 pm, web: www.NPIC.orst.edu

Table 9: Tennessee's contact in the case of a spill or accident

Steve Morawski, (860) 763-6012

Herbicide Spill Procedure (form also to be included in the YOPs)

REPORTABLE SPILLS (Spills of reportable quantity of material): FOLLOW STEPS 1-10

NON-REPORTABLE SPILLS: FOLLOW STEPS 1, 2, 3, 4, 7, 8 & 9 and contact the Tennessee representative.

Table 10: Herbicide Spill Check List

Order	ACTION	Done (√)
1	Use any and all PPE as directed by product label or MSDS.	
2	Cordon-off spill area to unauthorized people and traffic to reduce the spread and exposure of the spill	
3	Identify source of spill and apply corrective action, if possible stop or limit any additional amounts of spilled product.	
4	Contain spill and confine the spread by damming or diking with soil, clay or other absorbent materials.	
5	Report spills of "reportable quantity" to the Mass. DEP and MDAR:	
	MDAR, Pesticide Bureau	(617) 626-1700
	Massachusetts Department of Environmental Protection, Division of Hazardous Waste	Main Office: (888) 304-1133 Central Region: (508) 792-7650
6	If the spill cannot be contained or cleaned-up properly, or if there is a threat of contamination to any bodies of water, immediately contact any of the following applicable emergency response personnel:	
	local fire, police, rescue	911
	Tennessee Representative: Steve Morawski	(860) 763-6012
	Product manufacturer(s)	
	1	1
	2	2
	3	3
	Chemtrec	(800) 424-9300
	additional emergency personnel	
	If there is a doubt as to who should be notified, contact local State Police Barracks: FILL IN	
7	Remain at the scene to provide information and assistance to responding emergency clean-up crews	
8	Refer to the various sources of information relative to handling and clean up of spilled product	
9	If possible, complete the process of "soaking up" with absorbent materials	
10	Sweep or shovel contaminated products and soil into leak proof containers for proper disposal at approved location	
11	Spread activated charcoal over spill area to inactivate any residual herbicide	

Table 11. Local Emergency Numbers:

Emergencies Services for All Municipalities: 911

Town	Board of Health	Town	Board of Health
Ashland	(508) 881-0114	Southampton	(413) 529-1003
Burlington	(781) 270-1955	Sturbridge	(508) 347-2504
Danvers	(978) 777-0001	Wales	(413) 245-7571
Dracut	(781)231-4115	Westfield	(413) 572-6210
Easthampton	(413) 527-1212		
Essex	(978)768-7614		
Framingham	(508) 620-4827		
Hampden	(413) 566-2151		
Holland	(413) 245-7108		
Holyoke	(413) 322-5595		
Lanesborough	(413) 442-1167		
Peabody	(978) 538-5900		
Saugus	(781) 231-4115		

APPENDIX 1: PIPELINE SYSTEM MAPS AND LIST OF MUNICIPALITIES

Blackstone Laterals – 266A-100 and 266A-102A (same easement) and 266B-200 (tap)

Bellingham
Blackstone
Hopedale
Mendon
Upton

Rhode Island Lateral – 265E-100

Douglas
Northbridge
Sutton
Uxbridge

Worcester Delivery 265A-100 and 265A-200 (same easement)

Auburn
Millbury
Sutton
Worcester

MAPS AVAILABLE AT:

<http://www.tennesseeadvantage.com/EnvironmentalProjectNotifications.asp>

APPENDIX 2: MAPS OF SPOT TREATMENT LOCATIONS AND LIST OF MUNICIPALITIES

Tennessee identifies the following municipalities as locations where they intend to use herbicides to spot treat with hand-held equipment up to 300 ft² around cathodic protection installations and appurtances including rectifiers, magnesium groundbeds and test stations on the ROW for noxious vegetation, particularly poison ivy:

Ashland	Holland
Burlington	Holyoke
Danvers	Lanesboro
Dracut	Monson
Easthampton	Peabody
East Longmeadow	Saugus
Essex	Sturbridge
Framingham	Wales
Hampden	Westfield

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APPENDIX 3: LANDOWNER NOTIFICATION PLAN

Affected landowners will be notified via mass mailing prior to commencing herbicide application. The mass mailing address list will be generated by DOT Compliance Services – based on a 600 ft. corridor (300 ft. on either side of the pipeline). The form of Landowner Notification Letter is attached hereto as **Exhibit 1**.

Landowners will be asked to review the letter and an attached information sheet carefully and contact TGP via toll-free number or email within 15 days of receipt should they have concerns or objections. A contract answering service will receive all initial calls from landowners responding to the letter and shall follow the steps outlined below.

- Collect from caller
 - Name
 - Address
 - County
 - Phone
 - Email
 - Best time to call
 - Description of concerns
- Compile information
 - Excel spreadsheet
- Convey to landowner

Email to Property Rights

Property Rights (Houston) will receive concerned landowner information (Excel spreadsheet) from answering service and post it to a master tracking log. Property Rights (Houston) will distribute the information to the appropriate Field Property Rights Specialist for handling.

Field Property Rights Specialists will coordinate landowner response activities and conduct proper follow-up using the resources/steps outlined below.

- Resources
 - Field Property Rights Specialists (primary caller)
 - Core Team members (if requested by Field Property Rights)
 - Local operations supervision (if requested by Field Property Rights)
- Approach
 - Answer questions/educate
 - Obtain permission or refusal

- Communication Methods
 - Phone call
 - Face-to-face (as needed)
- Documentation
 - Master log will be updated to reflect all results of landowner contacts:
 - Field Property Rights Specialist, or
 - Property Rights in Houston, or
 - Core Team (as appropriate)
- Pre-work review of Master Tracking Log (Property Rights and Core Team) to address unresolved issues as follows.
 - Landowners who have not been reached (blanks in the log)
 - Landowners who have been contacted but additional follow-up is needed
 - Landowners who have denied permission to use herbicides
- Core Team and Field Property Rights Specialist identifies “no herbicide use” areas
 - Core Team communicates “no-herbicide use” areas to Area Operations Manager and contractor prior to and during pre-job meetings
- Annual Review Landowner Notification Process – Property Rights and Core Team

Prior to the spraying operations, the Contractor will distribute “door hangers” on all residents within the 600 ft.-wide corridor informing the residents of the upcoming work. The form of the pre-work door hanger is attached hereto as **Exhibit 2**, which will be revised as needed to be pipeline subsidiary-specific (Tennessee Gas Pipeline, Southern Natural Gas Company, etc.)

PROGRESS AND PERFORMANCE TRACKER/ISSUES LOG

Once spraying operations commence, Core Team members will field calls from Operations supervision or landowners in their respective divisions and log information on a SharePoint-housed tracking spreadsheet. Contractor's Project Manager will have ready access to the online tracker and will be notified immediately for all items requiring a response from the contractor. Target response time for follow-up calls is 24 hours.

Core Team (division-specific) will notify Field Property Rights Specialist about any calls pertaining to landowner issues. Contractor's Project Manager has ultimate responsibility for responding to all calls from landowners and Operations supervision.

Core Team will review the tracker monthly and liaison with the Contractor's Project Manager to ensure all landowner and contract performance issues are being addressed, resolved and documented in a timely manner.

CORE TEAM

TGP intends to utilize the Core Team to manage the IVM Program and related processes on an ongoing basis.

EXHIBIT 1 – FORM OF LANDOWNER NOTIFICATION LETTER

{ **Insert Date**}

Dear Pipeline Neighbor,

Did you know that vegetation on a pipeline right-of-way has the potential to increase the likelihood of damage to critical natural gas transportation facilities? As part of our ongoing commitment to public safety and to our vision of being the Neighbor to Have across our operations, { **Insert Name of Pipeline Subsidiary**} ({ **Insert Pipeline Subsidiary Contraction, e.g., “TGP”, “SNG”...**}) uses a variety of vegetation control methods, including tree cutting, mowing and the application of herbicides as part of our comprehensive right-of-way management program. We’re writing today to tell you about the program and ask for your help.

Our program has three key objectives:

- **Prevention.** Keeping our right-of-way clear of trees, tall maturing shrubs, and vine species alerts contractors and others to the presence of the underground pipeline and related facilities, helping reduce the likelihood of third party damage to facilities.
- **Response.** A clear right-of-way will help workers and equipment respond quickly in the unlikely event of an emergency.
- **Monitoring.** A clear and open right-of-way allows us to frequently inspect our pipelines by patrolling them from the ground or air. These patrols help us meet our strict standards for public safety as well as requirements by the U.S. Department of Transportation, Pipeline Hazardous Materials Safety Administration.

We wanted you to know that beginning on or after { **Insert Date** } , and continuing until December of this year, we’ll be conducting right-of-way maintenance activities in your area that will involve the careful application of herbicides to targeted plant species on the right-of-way, where trees, tall maturing shrubs, and vine species are present. We will not be spraying in areas where there is no large vegetation or where the growth of such vegetation is prevented by other means, for example in pastures, lawns, croplands, etc. Also we will not be spraying in any areas where the environmental and other permits and approvals we have applied for are yet to be obtained. Here’s what you can expect. In most instances, our contractors use low-volume, backpack-type sprayers to target undesirable woody plant species and tall weeds to help keep our right-of-way clear. The sprayers will travel in pick-up trucks, four-wheel ATV’s or farm tractors.

This process has several advantages. First, it ultimately promotes a healthy, meadow-like habitat for desirable, native plant and wildlife species. Additionally, compared to traditional methods of right-of-way maintenance such as mowing and brush-hogging, this method reduces the spread of undesirable plant species, minimizes damage to ground-nesting animals. Finally, this method also helps reduce rutting on the surface of the right-of-way, minimizes emissions and noise from mowing equipment, and reduces the frequency of right-of-way maintenance activities that could impact your property in the future.

Herbicides have been applied to control vegetation on rights-of-way in an environmentally sound manner for many years. Our contractors use only herbicides that have been approved by the Environmental Protection Agency and **{ Insert State }** for use in sensitive areas will be used, and may include: **{ Insert Name of Herbicides }** . Our contractor will use these herbicides in accordance with all applicable laws, rules, and regulations. To learn more, please refer to the attached flyer for additional information.

Our contractors also only use appropriately licensed and/or certified applicators that are trained to avoid and provide appropriate no-spray buffer zones around sensitive areas such as maintained yards, playgrounds, agricultural areas and wells.

What do you need to do? If you have a well, spring, garden or other environmentally sensitive area on or near the right-of-way, have large vegetation within our right-of-way on your property in areas we have traditionally mowed or maintained by other means, or you'd prefer we not use herbicides on your property, please call **{ Insert Smart Receptionist's Toll-Free Telephone Number }**. If we don't hear from you within 15 days of the date of this letter, we'll assume you authorize **{ Insert Pipeline Subsidiary Contraction }** to proceed with the herbicide control of vegetation on our pipeline right-of-way.

Finally, if you're not the owner of this property, please help us ensure the proper owner is notified by either informing the landowner about this letter or calling the number shown above and providing the owner's contact information so that we may do so.

{ Insert Pipeline Subsidiary Contraction } is committed to your safety and to being the Neighbor to Have in communities across our pipeline system where we operate. Working together, we can keep our pipeline safe and help protect your property.

If you have any questions or concerns, please call the number above and a company representative will contact you.

Sincerely,
{ Insert Contact Name }
{ Insert Contact Title }

Enclosure: Herbicide Information Sheet

Note: For the purpose of this communication, the term "right-of-way" includes any land area for which **{ Insert Pipeline Subsidiary Contraction }** possesses land rights, whether the rights were conveyed by a right-of-way easement, lease, or other land rights document. Also, this letter does not in any way amend or release any of **{ Insert Pipeline Subsidiary Contraction }** 's land rights on the property. In situations where a right-of-way agreement or other land rights document contains express authorization for herbicide use, that document will control and **{ Insert Pipeline Subsidiary Contraction }** will proceed in accordance with the document's provisions.

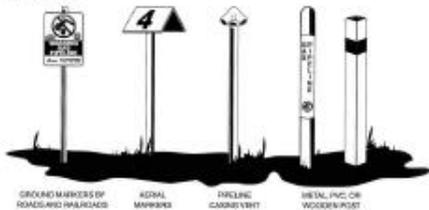
EXHIBIT 2 – FORM OF PRE-WORK DOOR HANGER
(Pipeline Subsidiary-Specific)



At Southern Natural Gas Company (SNG), we serve your energy needs by operating natural gas pipelines in this area. A recognized leader in safety and compliance, SNG is committed to the safety of the communities in which it operates.

Recognize pipeline markers

We mark all of our pipelines with warning signs that display information about what each pipeline transports and how to contact the pipeline company. The illustration below shows a few samples of different signs used by SNG and other pipeline companies to identify the general location of pipelines.



Understand the signs of a pipeline leak

Because of the stringent maintenance and inspection procedures employed by SNG, failures of pipeline systems are very rare. However, you should be aware of the possible signs of a pipeline leak:

- A blowing or hissing sound
- Dust blowing from a hole in the ground
- Blowing water, continuous bubbling, or an oil sheen in wet or flooded areas
- A gaseous, hydrocarbon, or other unusual odor
- A spot of dead or discolored vegetation in an otherwise green area
- Flames, if a leak has ignited
- Vapor clouds migrating to low lying areas

If you recognize any of the above signs, please contact Southern Natural Gas Company immediately at (800) 252-5860 or call 911 for emergency services.



**Know what's below.
Call before you dig.**



Date: ____ / ____ / ____

While you were out

{Insert Pipeline Subsidiary} representatives stopped by your home to let you know we will be performing right-of-way vegetation management activities (herbicide application) in your area during the next few days, as mentioned in a letter you should recently have received in the mail.

Please contact us at the number shown below if you would like to receive another copy of the letter, or if you would like to schedule a follow-up telephone call or site visit. If you are not the owner of this property, please either inform the landowner of the contents of this communication as soon as possible or call the number shown above and provide the owner's contact information so that we may do so.

1-888-555-5555

Safety First



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Sincerely,

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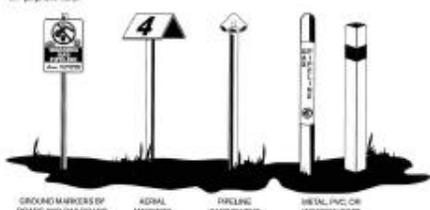
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- Flames, if a leak has ignited
- Vapor clouds migrating to low-lying areas

If you recognize any of the above signs, please contact Southern Natural Gas Company immediately at (800) 252-5950 or call 911 for emergency services.





Southern Natural Gas
 an El Paso company

Date: ____ / ____ / ____

While you were out
 {Insert Pipeline Subsidiary} representatives stopped by your home to let you know we will be performing right-of-way vegetation management activities (herbicide application) in your area during the next few days, as mentioned in a letter you should recently have received in the mail.

Please contact us at the number shown below if you would like to receive another copy of the letter, or if you would like to schedule a follow-up telephone call or site visit. If you are not the owner of this property, please either inform the landowner of the contents of this communication as soon as possible or call the number shown above and provide the owner's contact information so that we may do so.

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Safety First



APPENDICES 4 & 5 AVAILABLE AT:

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