

# **Fire Prevention and Suppression Plan**



FERC Docket No. CP09-\_\_\_\_-000

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## List of Abbreviations and Acronyms

BIA	Bureau of Indian Affairs
BLM	U.S. Bureau of Land Management
EI	Environmental Inspectors
NUIFC	Northern Utah Interagency Fire Center
OSFM	Office of State Fire Marshall
Plan	Fire Prevention and Suppression Plan
Project	Ruby Pipeline Project
Ruby	Ruby Pipeline, LLC.
USDA	U.S. Department of Agriculture
USFWS	U.S. Fish and Wildlife Service

# 1 Purpose

The Ruby Pipeline Project (Project), proposed by Ruby Pipeline, LLC (Ruby), is comprised of approximately 675.2 miles of 42-inch diameter natural gas pipeline, along with associated compression and measurement facilities, located between Opal, Wyoming and Malin, Oregon. An approximate 2.6-mile lateral, PG&E Lateral, would also be constructed south from the Malin Hub. As proposed, the Project would have a design capacity of approximately 1.5 million Dekatherms per day (MMDth/d), depending on final subscriptions. The Project's rights-of-way (ROW) would cross four states: Wyoming, Utah, Nevada, and Oregon. In addition to the pipeline facilities, Ruby proposes the installation of four compressor stations for the Project: one located near the Opal Hub, one in western Utah, one near the mid-point of the Project north of Elko, Nevada, and one northwest of Winnemucca, Nevada.

The purpose of the Fire Prevention and Suppression Plan (Plan) is to define responsibilities for prevention and suppression of fires during the construction Project. The Plan delineates the minimum requirements that shall be followed for the project construction activities. Ruby shall work with its construction contractors to assign specific rolls and responsibilities consistent with this Plan.

## 2 Objectives

The first objective of this Plan is to provide an implementation strategy to facilitate immediate, aggressive action to extinguish any wildfires that occur during construction of the Project. This Plan requires increased commitments of fire protection equipment, fire watch/monitoring efforts, and personnel during high fire risk periods.

The second objective of this plan is to establish protocols and lines of communication for reporting fires that occur as a result of construction activities or wildfires that are observed outside of the Project area.

### 3 Responsibilities

A Project map of each construction spread is included as Figure 1. The key persons responsible for fire prevention and suppression during the Project are the Chief Inspector, Spread Superintendents, Field Safety Officers, Environmental Inspectors, and Authorized Officers. Contact information for these positions in each spread is provided in Table 3.1.

The Chief Inspector is responsible for oversight of all activities along the pipeline or compressor station spread.

Spread Superintendents are responsible for general construction operations for their construction area and for ensuring that all aspects of this Plan and contractor fire control plans are being implemented. Spread Superintendents will be in communication with Chief Inspectors, Field Safety Officers, Environmental Inspectors, Authorized Officers, and local fire fighters, as necessary, to ensure that all personnel involved are aware of current fire hazards and the prevention methods being implemented. The Spread Superintendent will coordinate with federal and state fire management personnel during periods of high or severe fire conditions to ensure that all permit stipulations are being met and appropriate preventive measures are in place during all construction-related activities.

The Field Safety Officer (FSO) is responsible for managing all on-site fire suppression documentation. The FSO is responsible for ensuring that all fire suppression equipment is available and maintained, and that crewmembers are trained and certified to use the equipment properly. The FSO is also responsible for communicating current fire hazards and emphasizing any changes to the prevention methods to crew members on a daily basis. One FSO will be assigned to each spread and will report directly to the Spread Superintendent. When multiple activities require the presence of a FSO, the FSO shall appoint a designee for monitoring purposes.

Environmental Inspectors primarily function as environmental regulatory oversight. This oversight extends to the prevention and suppression of wildfires within and in the vicinity of the Project area. Environmental Inspectors should be familiar with all federal, state and local laws, ordinances, and regulations that pertain to the prevention, pre-suppression, and suppression of fires. Environmental Inspectors, in the event of an emergency, should also be briefed on, and have the ability to advise regarding all site-specific and contractor fire control plans for their jurisdictional area.

Authorized Officers are representatives from the jurisdictional land agency who supply information regarding potential fire hazard conditions or changes in prevention methods. This information includes, but is not limited to, current Fire Danger Ratings, presence of

other wildfires in the vicinity, and temporary restrictions on construction activities. If extreme fire danger is determined by the land management agency, the Authorized Officer, can direct the Spread Superintendent to increase the level of fire monitoring, install additional fire prevention or suppression equipment, or stop work, as necessary.

These key people will be responsible for the following procedures, as appropriate:

- Initiating and implementing all fire control activities during construction until relieved by professional fire suppression crews, if necessary. Actions should not be taken that may endanger employee safety. The Spread Superintendent and FSO must determine if the equipment on hand and training of crewmembers is capable of suppressing the fire. If the fire is determined to be too extensive or spreading too rapidly to be contained by equipment and personnel on hand, then the Spread Superintendent and FSO should instruct crewmembers to evacuate the site and yield to professional fire suppression crews to control the wildfire.
- Complying with all federal, state, and local laws, ordinances, and regulations that pertain to the prevention, pre-suppression, and suppression of fires.
- Immediately reporting all uncontrolled fires within the Project area or wildfires that are observed outside of the Project area, regardless of the source, to the nearest fire dispatch office as outlined in Table 4.1.

The Chief Inspector, Authorized Officer, Spread Superintendent, and Environmental Inspector will have the authority to stop or reduce construction activities or operations that pose a fire hazard until appropriate measures have been implemented.

The FSO will accompany the Spread Superintendent, Authorized Officer, or other third-party compliance inspector on fire inspections and take corrective action when observing or having been notified that fire protection measures have not been properly installed or maintained.

Additional responsibilities of the FSO will include:

- Ensure that all Project employees are informed of the Fire Control Plan.
- Conduct weekly inspections during fire season of tools, equipment, and first aid kits.
- Conduct regular inspections of flammable fuels and explosives storage and handling areas.
- Post “No Smoking” and “Designated Smoking Area” signs and fire rules at appropriate locations within the Project area.
- Provide initial response support in the event of a fire in the Project area and supervise fire suppression activities until relieved.

- Report all wildfires to the Spread Superintendent. In the absence of the Spread Superintendent, the FSO would report the wildfire to the appropriate federal, state, or local fire control jurisdiction.
- Provide weekly written burning and blasting schedules to the appropriate federal, state, and local fire control jurisdiction.
- Monitor construction site areas where activities may present fire safety issues, such as blasting.
- Maintain a 4X4, ¾ ton pick-up truck with designated equipment (See Table 8.1) at all times.

**Table 3.1 Project Contacts for each Spread**

<b>Title</b>	<b>Contact</b>	<b>Telephone (Day)</b>	<b>Telephone (Night)</b>
<b>Chief Inspector</b>	<b>TBD</b>	<b>TBD</b>	<b>TBD</b>
<b>Spread Superintendent</b>	<b>TBD</b>	<b>TBD</b>	<b>TBD</b>
<b>Field Safety Officer</b>	<b>TBD</b>	<b>TBD</b>	<b>TBD</b>
<b>Environmental Inspector</b>	<b>TBD</b>	<b>TBD</b>	<b>TBD</b>
<b>Authorized Officer</b>	<b>TBD</b>	<b>TBD</b>	<b>TBD</b>

## 4 Fire Notification

In the event of an uncontrolled fire, construction personnel on the scene are to notify the Spread Superintendent immediately. The Spread Superintendent is responsible for notifying the appropriate federal, state, or local fire control jurisdiction.

Table 4.1 outlines personnel that will require notification in the event of a fire.

Following an uncontrolled fire, the Spread Superintendent will be responsible for providing a written report within 24 hours to the appropriate land management agency and to the Chief Inspector.

**Table 4.1 Emergency Personnel to be Notified in the Event of a Fire**

<b>911 should be used for emergency purposes, unless otherwise instructed by local officials.</b>				
<b>Spread</b>	<b>Land Type/ District</b>	<b>Responding Agency</b>	<b>Contact</b>	<b>Contact Number</b>
<b>WYOMING</b>				
Spread No. n/a	BLM	Rawlins Interagency Dispatch Center	No contact specified	<b>800-295-9953</b> or <b>307-328-4393</b>
Spread No. n/a	Wyoming State Land	District Forester	Dana Stone	<b>307-787-6148</b>
Spread No. n/a	Private Land	Wyoming Office of State Fire Marshall (OSFM)	Lanny Applegate	<b>307-777-7288</b>
Spread No. n/a	Private Land (Lincoln County)	Local Fire Station	South Lincoln County Sheriff Dispatcher	<b>800-442-9001</b>
Spread No. n/a	Private Land (Uinta County)	Local Fire Station	Uinta County Sheriff Dispatcher	<b>307-783-1000</b>
<b>UTAH</b>				
Spread No. n/a	BLM	Northern Utah Interagency Fire Center (NUIFC)	Teresa Rigby	<b>801-977-4344</b>
Spread No. n/a	Wasatch-Cache NF	NUIFC	Kathy Jo Pollock	<b>801-236-3409</b>
Spread No. n/a	U.S. Fish and Wildlife Service (USFWS)	NUIFC	Tracy Swenson	<b>435-734-6449</b>
Spread No. n/a	State of Utah Land	NUIFC	Barbra Gardner	<b>435-538-5315</b>
Spread No. n/a	Indian Nations	NUIFC	Ute Indian Tribe (Rich County) Ronald Wopsock	<b>435-772-4992</b>
Spread No. n/a	Private Land	Utah OSFM	Ron Morris	<b>801-284-6350</b>
<b>NEVADA</b>				
Spread No. n/a	Elko BLM District (Including: BLM, Nevada Division Of Forestry, FS, BIA, Sho-Pai Firefighters, and USFWS)	Elko Interagency Dispatch Center	No contact specified	<b>775-748-4000</b>
Spread No. n/a	Winnemucca BLM District (Including: BLM, FS, BIA, USFWS)	Central Nevada Interagency Dispatch Center	No contact specified	<b>775-623-3444</b> (24hr fire reporting) <b>775-623-1555</b> (Business line)
Spread No. n/a	Surprise BLM District (CA and NV) (Including: BLM, FS, California Department of Forestry, public and private lands)	Surprise Valley Fire Station	No contact specified	<b>503-279-2729</b>
Spread No. n/a	Private Land	Nevada OFSM	James Wright	<b>775-684-7500</b>
<b>OREGON</b>				
Spread No. n/a	Lakeview BLM District (Including: BLM, FS, Oregon Department of Forestry, and USFWS)	Lakeview Interagency Fire Center	No contact specified	<b>541-947-2177</b>
Spread No. n/a	Private Land	Oregon OSFM	General office number	<b>503-378-3473</b>

# 5 Emergency Fire Protocols During Fire Season

Fire condition classes based on standard vegetation fuel models will be used by the land managing agencies to determine the required fire prevention, control, and monitoring efforts. Based on the fire condition class, certain activities such as blasting, welding, or grinding could be restricted during periods of high or severe fire danger. The Authorized Officer may modify or change requirements based on the assessment of specific fire restriction notices or localized risks or hazards.

Each morning, the FSO will contact the federal state or local fire management office to obtain information on the fire restriction level and the potential for a “red flag warning”. The FSO will communicate this information to the Spread Superintendent, Environmental Inspectors, and field crews.

Fire restriction levels and required preventive measures are listed in Table 5.1.

**Table 5.1 Fire Restriction Stages**

<b><i>No Fire Restrictions</i></b>
<ul style="list-style-type: none"> <li>• Normal Fire Precautions</li> </ul>
<b><i>Stage 1 Fire Restrictions</i></b>
<ul style="list-style-type: none"> <li>• Normal fire precautions with the exception of designated smoking areas.</li> <li>• A permit is required for warming or cooking fires.</li> </ul>
<b><i>Stage 1 Fire Restrictions with “Red Flag Warning”</i></b>
<ul style="list-style-type: none"> <li>• All machine treatment of slash, skidding, yarding, blasting, welding, metal cutting, and offloading on the right-of-way are subject to BLM requirements.</li> <li>• No smoking or warming/cooking fires are permitted.</li> <li>• Power saws shut down from 9:00 P.M. to 8:00 A.M (local standard time).</li> <li>• Hauling trucking must stay on the right-of-way or surfaced roads after 5:00 P.M. (local standard time).</li> <li>• Utilization of additional personnel, equipment, and prevention measures.</li> </ul>
<b><i>Stage 2 Fire Restrictions</i></b>
<ul style="list-style-type: none"> <li>• Shutdown of all construction activities except operations on soil or graded ROW, road excavation, watering, grading, trench excavation, padding, backfilling, and clean-up.</li> <li>• All other activities, such as blasting and welding, require an exemption from the Authorized Agent.</li> </ul>

**Table 5.1 Fire Restriction Stages**

- **The Chief Inspector or Environmental Inspector have the discretion to restrict or shutdown construction activities on private lands during all precautionary periods.**
- **In extreme cases, the Authorized Agent has the discretion to shut down all construction activities and bar all right-of-way areas from entry.**

# 6 Fire Precautions During Construction

## 6.1 Blasting

The Spread Superintendent will provide, in writing, a blasting schedule to the Superintendent Chief Inspector and Environmental Inspector that includes locations and times. The Spread Superintendent will also provide blasting schedules to the Authorized Officer. When possible, an Environmental Inspector, the FSO or his designee should be on site during blasting activities.

During Stage I Fire Restrictions, the Ruby FSO is required to be on site during the operation and remain on site for one hour after the completion of blasting. At least one Size 0 or larger shovel and one water-filled backpack pump must be on site.

During Stage II Fire Restrictions, blasting is prohibited unless an exemption has been granted by the Authorized Agent. If an exemption has been granted, additional fire prevention equipment and personnel must be on site prior to blasting. Equipment may include fire tankers, shovels, backpack pumps, bulldozers, etc. Equipment must be kept on site for at least two hours after the completion of blasting activities.

## 6.2 Welding

During fire season, welding, cutting, or drilling of metal components of the Project require the approval of the Spread Superintendent. In areas where approval has been granted, vegetation must be cleared at a minimum diameter of 20 feet around the center of the work area. Each welding crew should be outfitted with at least one Size 0 or larger shovel, one water-filled backpack pump, and one 5-pound dry powder CO<sub>2</sub> fire extinguisher.

During Stage I Fire Restrictions with a “Red Flag Warning”, the above measures are required. In addition, a Fire Watch will be assigned to each crew. The Fire Watch will remain on site for one hour after the completion of welding activities.

During Stage II Fire Restrictions, an exemption by the Authorized Officer is required prior to any welding activities. If an exemption is granted, all Stage I Fire Restriction measures must be implemented. In addition, a water tanker and bulldozer are required to be on site during all operations and remain on site for at least two hours after the completion of welding activities.

Fire restriction measures also apply to welding operations performed for equipment maintenance within the Project area.

### **6.3 Equipment Provisions**

The contractor shall furnish a list of construction equipment proposed for the Project. All equipment assigned to the Project may be inspected by the Authorized Officer for the land jurisdiction involved or other third party compliance inspector before it is used in construction of the Project. The equipment may be used on the Project only while in good operating order.

If required, flues used in construction camps and material staging yards shall be equipped with spark arresters in good working order and meeting U.S. Department of Agriculture (USDA) Forest Service standards.

### **6.4 Spark Arrestors**

All internal combustion engines, stationary and mobile, shall be equipped with spark arresters, meeting USDA Forest Service standards. Spark arresters shall be in good working order. Light trucks and cars with factory-installed (type) mufflers, in good condition, may be used on roads where the roadway is cleared of all vegetation. On roads where vegetation exists, spark arresters shall be used.

Vehicles equipped with catalytic converters are potential fire hazards and will be parked on areas cleared of vegetation.

### **6.5 Equipment Parking and Storage Areas**

Equipment parking areas and small stationary engine sites shall be cleared of all extraneous flammable materials.

Gas and oil storage areas shall be cleared of extraneous flammable material and "No Smoking" signs shall be posted throughout the area at all times.

All used and discarded oil, oil filters, oily rags, or other waste shall be disposed of in approved and marked containers. Containers shall be stored in approved locations and removed from the site by licensed contractors or approved personnel and disposed or recycled at approved facilities.

Glass jugs or bottles shall not be used as containers for gasoline or other flammable materials.

### **6.6 Power Saws**

All gasoline-powered saws shall be provided with approved spark arresters/ mufflers, which shall be in good operating condition. Gasoline-powered chain saws shall be maintained in

good condition throughout their assignment to the Project. Chain saws and the operation of chain saws shall comply with the following requirements.

- Arrester/muffler shall contain a 0.023-inch mesh, stainless steel screen.
- During operation of chain saws, the following conditions shall be adhered to:
  - a) Chainsaw operators shall have a fire extinguisher or water backpack and shovel available.
  - b) Power saws shall be moved at least 10 feet from the place of fueling or refueling before starting.
  - c) All gas shall be carried in metal safety cans.

## **6.7 Warning Devices**

Torches, fuses, highway flares, or other devices with open flames shall not be allowed. The Contractor shall use only electric or battery-operated warning devices within the Project area.

## **6.8 Warming and Cooking Fires**

Permits shall be obtained from the Authorized Officer for lunch or warming fires when Stage 1 or higher fire conditions are declared. Permits shall:

- Specify the use and location of fires.
- Require all fire location to have shovels, extinguishers, and water available.
- Require that fires be completely extinguished at the end of the day and/or when abandoned.
- Permits will be issued for use only in areas that require them.

## **6.9 Smoking**

Smoking is allowed only in areas designated by Ruby's FSO. Smoking signs that are visible to all employees should be posted at designated areas and the Contractor's supervisory personnel will be responsible for enforcing smoking restrictions. "No Smoking" signs shall be posted in all refueling areas and areas where flammable liquids or materials are used, stored, or discarded.

## **6.10 Refueling and Refueling Areas**

All fuel trucks shall be equipped with a 35-lb minimum CO<sub>2</sub> fire extinguisher. If required, helicopter refueling trucks will be electrically grounded to the helicopter during refueling.

Storage areas shall be cleared of all extraneous flammable materials. All discarded oil, oil filters, oily rags, or other potentially flammable wastes shall be disposed as described in Section 6.5 above. Only approved and properly maintained containers will be used to store or transport flammable liquids.

# 7 Fire Prevention Equipment

## 7.1 Construction Vehicles

All man-hauls, trucks, tractors, pickup trucks, and personnel vehicles assigned to the job must be equipped with one 5-lb minimum dry chemical fire extinguisher and one shovel.

Water tankers on site during blasting “red flag warnings”, and Stage II scenarios will be outfitted with a pressure pump, adjustable nozzle, threaded rubber-lined hose, a minimum of 300 feet of 1-1/2-inch cotton jacket, and have a minimum water storage capacity of 1,500 gallons.

## 7.2 Fire Fighting Tool Caches

At least three 10-person tool caches will be maintained per spread. One cache will be placed in an Environmental Inspector’s 4 x 4 vehicle associated with the ROW clearing, the improvement of access roads, and other construction activities. The second tool cache will be located with the Spread Superintendent and the third will be assigned to the FSO, who will have a radio in his vehicle. The tool boxes shall be red in color, sealed with metal box-car-type seals, and labeled “For Fire Fighting Only”. The tool caches shall have the following tools placed therein:

- Ten electric headlamps with batteries.
- One first aid kit, 10-man unit.
- Two knapsacks.
- Five pulaskies with sheaths.
- Five long-handled, rounded, Size 0 shovels.
- Five fire rakes.
- Ten one-gallon canteens, filled with water.

The Spread Superintendent will immediately expedite delivery of the tool caches upon request of the FSO, the Authorized Officer, or when alerted to an emergency requiring the tools.

In case any tool cache has been used, it shall be immediately replenished. When a first aid kit is used (seal broken), it shall be replaced by a new (sealed) first aid kit. All replenished first aid boxes shall be inspected by the FSO. The first aid box shall then be wired or resealed before being returned to the construction site.

### 7.3 Field Safety Officer

The FSO vehicle will maintain the required equipment list at all times, although suitable substitutions may be made as necessary (Table 7.1).

**Table 7.1 Minimum FSO Equipment**

Item	Description	Quantity
1	Pickup Truck (4X4), ¾ Ton	1
2	Two-Way Mobile Radio Operating (Administrative Unit) Frequency	1
3	Fire-Fighting Tool Cache (for contents see above)	1
3	“Slip On” Water Tank with 125 Gallon Capacity and Pump Units with Hose Fittings	1
4	Axe, Double Bit, Cruiser Type	1
5	Sheath for Axe	1
	Round-Pointed Size 0 Shovel	2
6	Hard Hat	2
7	Backpack Pump, Complete (filled with water)	2
8	Hoses Cotton Jacket, 1-1/2” (NS Thread) Cotton Jacket, 1” (IP Thread) High Pressure, 1” (IP Thread) Suction, 1-1/2”	200’ 400’ 250’ 24’
9	Hose Fittings R-F Forester Nozzles R-S Nozzle, Tips (a) Fog (b) Straight Stream Reducer, 1-1/2” NS to 1” IP Stainer, Suction, 1-1/2” Siamese, 1-1/2” NS Thread, both Male and Female	2 6 6 4 1 1 1
10	Tools Spanner-Wrench, Large, 1-1/2” Hose Spanner-Wrench, Small, 1” Hose Carpenter Hammer Pliers, Slip Joint	1 1 1 1
	Fire Extinguishers 35-lb minimum CO <sub>2</sub>	1

# 8 Mandatory Training

## 8.11 Field Crew Training Requirements

In addition to personnel listed in 3.0, Foremen, Lead Personnel and Inspectors must complete a site specific fire prevention and suppression training which will include:

- Briefing on the chain of command and fire reporting process;
- Emergency contacts and numbers;
- Basic fire prevention behavior controls;
- Basic training and uses of handtools, water backpacks, etc.;
- Briefing on all other information contained in this document;
- Specific actions and expectations when a fire occurs and safety precautions; and
- Evacuation procedures if ordered by the FSO.

# A. Construction Spreads

**Figure 1 Construction Spreads**