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APR 13 2015

DIVISION OF WATER QUALITY

ATTACHMENT E – NOTICE OF INTENT

ORDER WQ 2014-XXXX-DWQ
GENERAL PERMIT NO. CAG990002

STATEWIDE GENERAL NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM
(NPDES) PERMIT FOR DISCHARGES FROM UTILITY VAULTS AND UNDERGROUND
STRUCTURES TO WATERS OF THE UNITED STATES

I. NOTICE OF INTENT STATUS (See Instructions)

MARK ONLY ONE ITEM	1. <input type="checkbox"/> New Discharger	2. <input checked="" type="checkbox"/> Existing Discharger	WDID # 5000000059
	3. <input type="checkbox"/> Change of Information: WDID # _____		
	4. <input type="checkbox"/> Change of ownership or responsibility: WDID# _____		

II. OWNER/OPERATOR (If additional owners/operators are involved, provide the information in a supplemental page.)

A. Name Wild Goose Storage Inc. (Niska Partners)		Owner/Operator Type (Check One)		
		1. <input type="checkbox"/> City	2. <input type="checkbox"/> County	3. <input type="checkbox"/> State
		4. <input type="checkbox"/> Gov. Combo	5. <input checked="" type="checkbox"/> Private	
B. Mailing Address 2780 West Liberty Road				
C. City Gridley	D. County Butte	E. State CA	F. Zip Code 95948	
G. Contact Person Pat Baynard	H. Title Production Coordinator, Engineering & Operations		I. Phone (530)-846-7385	
J. Email Address Patrick.Baynard@niskapartners.com				

Additional Owners _____

III. BILLING ADDRESS (Enter information only if different from II. above)

Send to: <input checked="" type="checkbox"/> Owner/Operator <input type="checkbox"/> Other	A. Name	B. Title		
	C. Mailing Address			
D. City	E. County	F. State	G. Zip Code	

IV. RECEIVING WATER INFORMATION

A. Attach a project map(s) that shows (1) the service area within the a specific Regional Water Board boundary and maps of(2) the corresponding major surface water(s) bodies and watersheds to which utility vault or underground structure water may be discharged. Map features must also include ASBS boundaries, MS4 discharge points to the ASBS, and major roadways.
Attached as: Figure 1 - RWQCB Discharge Region, and Figure 2 - Discharge Receiving Waters

B. Regional Water Quality Control Board(s) where discharge sites are located
List the Water Board Regions where discharge of wastewater is proposed, i.e. Region(s) 1, 2, 3, 4, 5, 6, 7, 8, or 9:
Region 5

V. LAND DISPOSAL/RECLAMATION

The State Water Resources Control Board's water rights authority encourages the disposal of wastewater on land or re-use of wastewater where practical. You must evaluate and rule out this alternative prior to any discharge to surface water under this Order.

Is land disposal/reclamation feasible for all sites? Yes No

Is land disposal/reclamation applicable to a portion of the total number of sites? Yes No

If **Yes** to one or both questions, you should contact the Regional Water Board. This Order does not apply if there is no discharge to surface waters. If **No** to either or both questions, explain:
Wastewater is not discharged directly into surface waters but the land discharges eventually reach surface waters. The Well Pad Site is surrounded on all sides by jurisdictional wetlands. Water is discharged from vaults to the inside of the WPS berms where it eventually flows out through a gate valve to the wetlands. Similarly, the Remote Facility Site is surrounded on three sides by rice fields. Water that is discharged overland flows southward eventually draining into the drainage ditch along West Liberty Road.

VI. VERIFICATION

Have you contacted the appropriate Regional Water Board or verified in accordance with the appropriate Basin Plan that the proposed discharge will not violate prohibitions or orders of that Regional Water Board? Yes No

VII. TYPE OF UTILITY VAULT OR UNDERGROUND STRUCTURE (Check All That Apply)

Electric Natural Gas Telecommunications Other: _____

VIII. POLLUTION PREVENTION PLAN CONTACT INFORMATION

Each Discharger is required to provide a copy of their PLAN with their completed NOI. The PLAN requirements are provided in Section VII.C.3 of the Order. In the space below, provide the contact information for the person responsible for the development of the PLAN.

A. Company Name Wild Goose Storage Inc.		B. Contact Person Pat Baynard	
C. Street Address Where PLAN is Located 2780 West Liberty Road		D. Title of Contact Person Production Coordinator, Engineering & Operations	
E. City Gridley	F. County Butte	G. State CA	H. Zip Code 95948
I. Phone (530)-846-7385		J. Email Address Patrick.Baynard@niskapartners.com	

IX. DESCRIPTION OF DISCHARGE(S)

Describe the discharge(s) proposed. List any potential pollutants in the discharge. Attach additional sheets if needed.

Discharges of stormwater occur from subsurface gas valve vaults located at the Well Pad Site, and from liquid above-ground tank secondary containment basins located at the Remote Facility Site (RFS).

Only scheduled discharges occur from Wild Goose Storage (WGS) facility sites. No automatic or unscheduled discharges occur since all discharges occurring from WGS facilities are directly controlled by the operators, either by activating a manual valve or by using a portable pump. Furthermore, WGS facilities that produce stormwater discharges are not affected by emergency operations of the natural gas storage project, so no emergency discharges occur at the facility.

Potential pollutants that may mix with stormwater, either in the subsurface vaults at the Well Pad Site or in secondary containment at the RFS, include hydraulic oil, oil and grease lubricants, glycol, aqueous urea, and methanol. In all cases, volumes subject to contact with stormwater are limited only to residual surface films found on the valves, piping, flanges or other similar components, or small puddles where these pollutants might have dripped from the components.

X. REMINDERS

- | | | |
|--|---|---|
| A. Have you included service territory/watershed map(s) with this submittal?
Separate maps must be submitted for each Regional Water Board where a proposed discharge will occur. | <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> No |
| B. Have you included payment of the filing fee (for first-time enrollees only) with this submittal? | <input type="checkbox"/> Yes | <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A |
| C. Have you included your PLAN? | <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> No |

XI. CERTIFICATION

"I certify under penalty of law that this document and all attachments were prepared under my direction and supervision in accordance with a system designed to ensure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine or imprisonment."

A. Printed Name: Pat Baynard

B. Signature: Pat Baynard C. Date: 4/6/2015

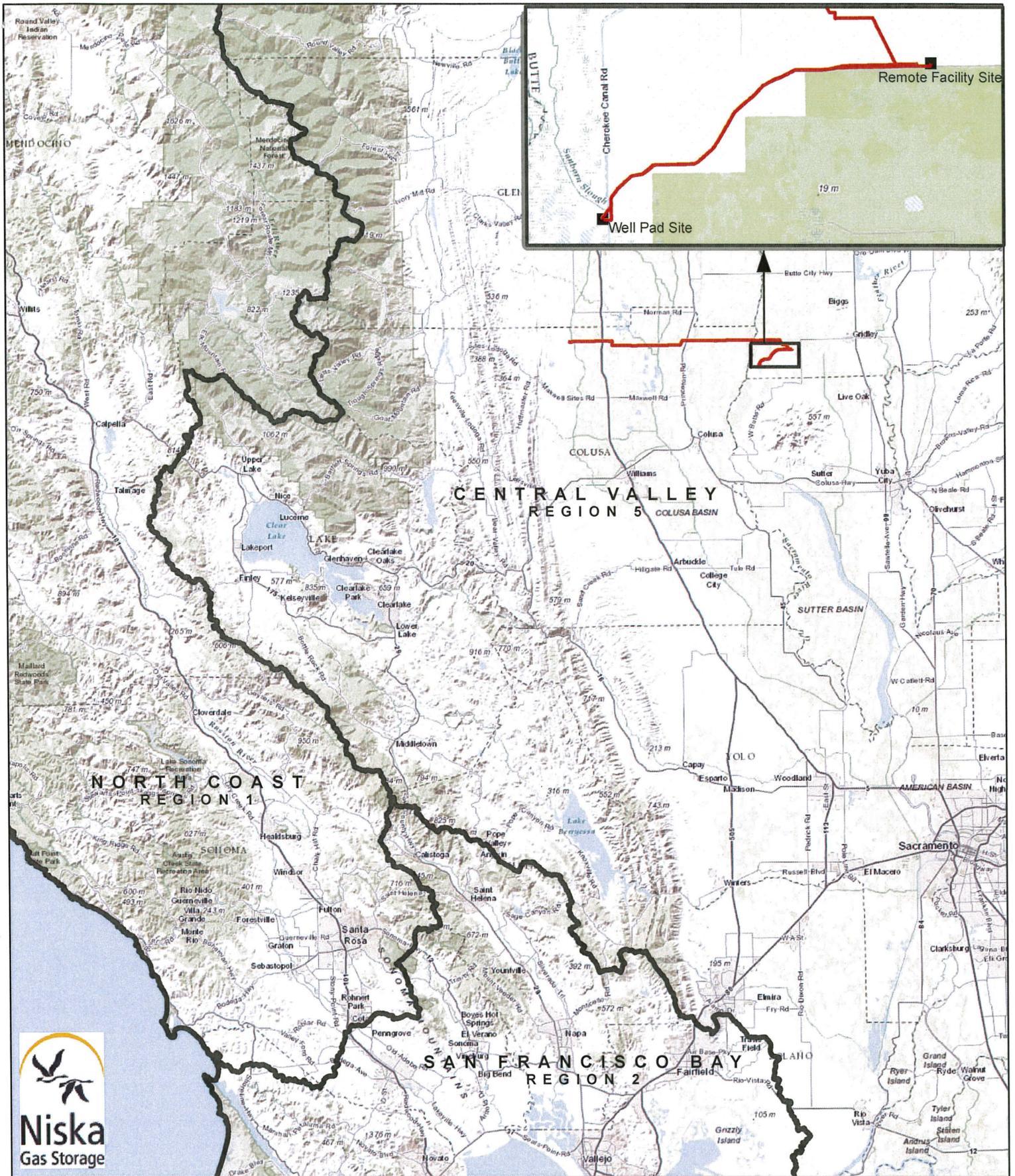
D. Title: Production Coordinator

PLEASE SUBMIT THE NOI, FIRST ANNUAL FEE, PLAN, AND MAP
TO THE FOLLOWING ADDRESS:

UTILITY VAULTS NOI
NPDES UNIT
DIVISION OF WATER QUALITY
STATE WATER RESOURCES CONTROL BOARD
P.O. BOX 100
SACRAMENTO, CA 95812-0100

STATE USE ONLY

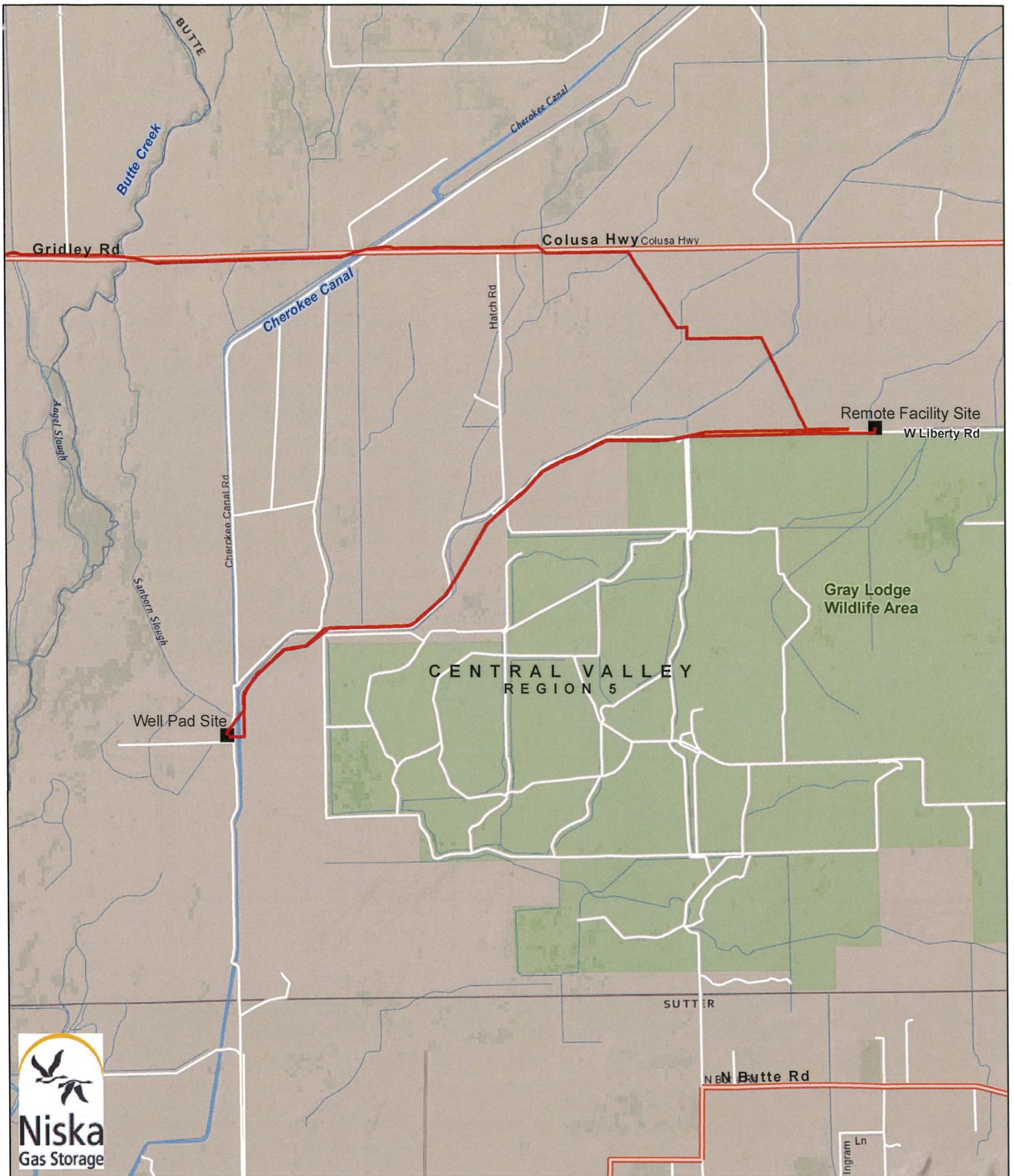
WDID:	Regional Board Office	Date NOI Received:	Date NOI Processed:
Case Handler's Initial:	Fee Amount Received: \$	Check #:	



3/23/2015

- Discharge Locations
- Natural Gas Pipeline Alignment
- RWQCB Jurisdictions

Figure 1 - RWQCB Discharge Region
 Pollution Prevention Plan
 Wild Goose Storage, LLC



3/23/2015



0 0.25 0.5 1 1.5 2 miles

- Discharge Locations
- Natural Gas Pipeline Alignment

Figure 2 - Discharge Receiving Waters
 Pollution Prevention Plan
 Wild Goose Storage, LLC

**General Permit for
Discharge from Utility Vaults and Underground Structures to Surface
Waters**

**Order WQ 2014-0174-DWQ
NPDES No. CAG990002**

**POLLUTION
PREVENTION PLAN**



**Niska
Gas Storage**

April 2015

Prepared For
**Wild Goose Storage, LLC
Wild Goose Gas Storage Project
2780 West Liberty Road
Gridley, CA 95948**

Prepared By

**505 Sansome Street, Suite 1600
San Francisco, CA 94111**

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APPENDIXES

APPENDIX A: REGIONAL WATER QUALITY CONTROL BOARD (RWQCB) DISCHARGE REGION

APPENDIX B: DISCHARGE RECEIVING WATERS

APPENDIX C: REMOTE FACILITY SITE AND WELL PAD SITE MAPS



1.0 INTRODUCTION

Wild Goose Storage Inc. (WGS) became a public natural gas utility upon certification of its natural gas storage project by the California Public Utilities Commission on June 25, 1997. WGS is unique in that it does not have a defined 'service area', but can offer its natural gas storage services to any customer based on that customer's particular natural gas needs. In 2006, EnCana, parent company of WGS, sold its United States gas storage assets to Niska Gas Storage Partners LLC, (Niska) whereupon the legal name for this facility became Wild Goose Storage, LLC (WGS).

Utility companies, including WGS, may have multiple discharges from utility vaults, other underground structures, and secondary containment areas as a result of subterranean seepage and/or stormwater inflow. These structures may have small quantities of oil and grease present due to the normal operation of equipment, as well as small quantities of other pollutants. The State of California Water Resources Control Board (SWRCB) has elected to issue a statewide National Pollutant Discharge Elimination System General Permit CAG990002 (General Permit) that may be applied to most discharges from utility companies. The purpose of the General Permit is to facilitate regulation of discharges from these kinds of multiple discharges. To obtain authorization for continued and future discharges to waters of the United States, utility dischargers must submit a Notice of Intent to Comply in order to be regulated under this General Permit, as provided in 40 Code of Federal Regulations Part 122.28 (b)(2).

As a condition of the General Permit, utility companies' that propose to discharge at numerous points are required to prepare and implement a Pollution Prevention Plan (PLAN) for all discharge locations. The PLAN characterizes the pollutants discharged, identifies existing control measures to reduce pollutants, and describes best management practices (BMPs) to be implemented to further reduce or prevent pollutants from encountering stormwater(s). In addition, the PLAN includes appropriate scale maps showing the location of potential discharges and potential waters that discharges might encounter within the utilities' specific SWRCB service area (see Appendix A, B, and C). The PLAN also includes a Pollution Prevention Team and Employee Training Program to ensure implementation of the PLAN and proper execution of its procedures. Lastly, the PLAN is intended to comply with Best Available Technology Economically Achievable (BAT) and Best Conventional Pollutant Control Technology (BCT) for the types of facilities and the anticipated discharges associated with those facilities.

The PLAN will be evaluated annually to evaluate its overall effectiveness in controlling the discharge of pollutants during a discharge event. WGS will amend this PLAN whenever there is a change in construction, operation or maintenance, or when such an amendment is necessary to ensure compliance with BAT or BCT and receiving water limits. The PLAN will also be amended if it is in violation of any conditions of the General Permit or has not achieved the objective of controlling pollutants in discharges to surface waters. This PLAN will be maintained at the WGS facility at 2780 West Liberty Road Gridley, CA 95948, as well as maintained electronically by WGS, and will be available for inspection by SWRCB and Regional Water Board personnel.

2.0 GENERAL DESCRIPTION OF THE PROJECT

Construction of the existing Wild Goose Gas Storage Project in Butte County, California, has occurred over numerous phases between April 1997 and September 2013. Development of this facility has involved the transformation of a depleted and abandoned underground natural gas field for its current use in gas storage. The entire project area is located within the jurisdiction of the Redding Office of the Central Valley Regional Water Quality Control Board. As depicted on the attached map (see Appendix A).



Wild Goose Storage LLC – Pollution Prevention Plan

2.1 WELL PAD SITE

The approximately 8.5-acre Well Pad Site was created at the location of the abandoned original Wild Goose Gas Field production compression facility on the Wild Goose Club. The Club consists of over 1,400 acres of wetland and riparian lands which are managed as habitat for waterfowl and other wetland/marsh species. As part of the Butte Sink, the entire area is subject to winter flooding when high flows from the Butte Creek watershed encounter Sacramento River flood flows in the Colusa Bypass via Moulton Weir, backing the water up into Butte Sink. At the Well Pad Site, flood levels have been measured at depths of up to 4 feet, and the site may be at least partially inundated for up to several weeks. The Well Pad Site is surrounded by an approximately 3- to 4-foot high landscaped berm, contains 17 injection/withdrawal wells, four gas field observation monitoring wells, associated piping, two pig launcher/receivers, and a small instrument building which houses the monitoring and control equipment. The well head valves are contained in subsurface concrete vaults, (caissons) approximately 10 feet by 15 feet by 8 feet deep, each with an approximately 4,300 gallon capacity, and are normally covered by steel tubing. All equipment and facilities are designed to withstand this periodic inundation; except the instrument building, which is elevated above the flood water level. Hydraulic pressure provided by a pump in the instrument building is used to operate the valves. The site is covered with compacted aggregate road base, providing a virtually impervious surface, and drainage is toward the southwest corner where a gate valve controls runoff releases into an adjacent wetland area. Stormwater in the subsurface vaults (caissons) at this site results from rainfall, surface runoff and the flood waters which may inundate the site.

2.2 REMOTE FACILITY SITE

The approximately 16.7-acre Remote Facility Site (RFS) for metering, processing, and compressing of natural gas, is located on West Liberty Road approximately 4.5 miles northeast of the Well Pad Site. The RFS connects natural gas pipelines to both the Well Pad Site and to Pacific Gas and Electric Company's (PG&E's) gas transmission pipeline system in Colusa County, to the west. The RFS is comprised of four plants containing facility equipment, including material storage tanks with secondary confinement areas. The following table details equipment located at each of the four RFS plants, including those areas that are sampled for evaluation of contained stormwater for discharge.

Equipment/Containment	Associated Sampling Location (SL) Number	Approximate Capacity (gallons)
RFS Plant 1		
Produced Water Tank Containment	SL-1	110,880
Glycol Regenerator Unit Containment	SL-2	12,100
Methanol Pumps Containment	SL-3	440
SWD Pumps Containment Area	SL-17	14,500
Glycol Regenerator C Containment	SL-33	6,200
RFS Plant 2/3		



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Equipment/Containment	Associated Sampling Location (SL) Number	Approximate Capacity (gallons)
Building Drain Tank Containment	SL-4	3,600
Aqueous Urea Tank Containment	SL-5	9,400
RFS Plant 4		
Building Drain Tank and Process Drain Tank Containment	SL-28	5,582
Urea Containment	SL-29	8,931
Glycol Regenerator Containment	SL-30	2,200
Glycol Storage Containment	SL-31	2,208

The RFS also contains an office, various vessels and piping runs, and a compressed air and materials storage building. While such facilities are normally located at the same site as the wells, this location was chosen to avoid impacts to wetlands. The RFS is outside the 100-year flood plain, surrounded on three sides by rice fields. Across the county road from the facility is the State of California’s Gray Lodge Wildlife Management Area which provides extensive riparian and wetland acreage. The site is covered with aggregate providing a permeable surface, and drainage is generally southerly toward the ditch along the north edge of the county road. This ditch drains toward the west, consistent with the very flat gradient in the vicinity.

2.3 NATURAL GAS PIPELINE

The RFS and the Well Pad Site are connected by 18-inch and 24-inch diameter, bi-directional flow natural gas pipelines of approximately 4.5 miles in length. There are no water discharges associated with the pipelines.

A 25.5-mile long, 30-inch diameter underground pipeline connects the RFS to PG&E’s backbone gas transmission pipeline system west of Delevan, in Colusa County. Ancillary facilities include a mainline block valve lot just west of the Sacramento River, and a meter station at the Interconnect Site adjacent to PG&E’s Delevan Compressor Station. Both locations are fenced, graveled lots with above-ground equipment and piping. There are no water discharges associated with the pipeline or ancillary facilities.

3.0 PLAN ADMINISTRATION

3.1 POLLUTION PREVENTION TEAM

The Pollution Prevention Team is led by Mr. Patrick Baynard, Production Coordinator for WGS. Mr. Baynard is responsible for implementation, maintenance, and overall effectiveness of the PLAN, and is the appropriate contact person for questions from the SWRCB or Regional Water Board personnel concerning the PLAN. Names, responsibilities, and contact information for the team are listed below.



Wild Goose Storage LLC – Pollution Prevention Plan

Name	Title	Responsibilities	Contact Information
Patrick Baynard	Production Coordinator	PLAN team oversight, PLAN team training	Office: 530.846.7353 Cell: 530.363.0032 Email: patrick.baynard@niskapartners.com
Kelly Baltimore	HSE Coordinator	Reviewing, revision and auditing of PLAN	Office: 403.513.8663 Cell: 403.988.7041 Email: kelly.baltimore@niskapartners.com
Gary Theberge	Manager Engineering & Operations	Support , review and revision of PLAN	Office: 403.513.8631 Cell: 403.863.8586 Email: gary.theberge@niskapartners.com

3.2 EMPLOYEE TRAINING PROGRAM

WGS will ensure that all employees involved with dewatering procedures and maintenance will be trained in all aspects of the permit. Specifically, staff who dewater utility vaults, underground structures, or secondary containment areas will be trained in the use of Secondary Containment Discharge Record dewatering checklists prior to the discharge of any contained waters to ensure PLAN compliance. A blank copy of Secondary Containment Discharge Record checklists can be found on the WGS share drive at S:\REPORTS\FORMS. Employee training will be repeated on an annual basis to assure adequate understanding of the PLAN goals, objectives, and procedures, and will be administered by the Pollution Prevention Team lead, as described in the table above. The Employee Training Program will include the following general topics:

- Good housekeeping practices
- Sampling, visual observation techniques, and performing visual inspections for sheen on collected stormwater
- Material transfer procedures
- Preventive maintenance
- Spill prevention and response
- Dewatering checklist procedures
- Recordkeeping
- Best Management Practices

Records of employee training will be maintained at the WGS facility at 2780 West Liberty Road Gridley, CA 95948, maintained electronically by WGS, and will be available for inspection by the SWRCB and Regional Water Board personnel.



4.0 POTENTIAL POLLUTION SOURCES

4.1 POTENTIAL POLLUTANTS

Potential pollutants that may mix with stormwater, either in the subsurface vaults at the Well Pad Site or in secondary containment at the RFS, include hydraulic oil, oil and grease lubricants, glycol, aqueous urea, and methanol. In all cases, volumes subject to contact with stormwater are limited only to residual surface films found on the valves, piping, flanges or other similar components, or small puddles where these pollutants might have dripped from the components. The systems and equipment and pollutants subject to stormwater contact and discharges are listed in the table below.

System/Equipment	Associated Sampling Location (SL) Number	Potential Pollutant	Trade Name
Well Pad Site			
Gas Well Valve Vaults	SL-6 through SL-16 and SL-18 through SL-27	Hydraulic Oil	Chevron Clarity
		Grease	--
RFS Plant 1			
Produced Water Tank Containment	SL-1	Oil & Grease	--
Glycol Regenerator Unit Containment	SL-2	Oil & Grease	--
		Glycol	Triethylene Glycol
Methanol Pumps Containment	SL-3	Oil & Grease	--
		Methanol	Methanol Alcohol
SWD Pumps Containment Area	SL-17	Oil & Grease	--
Glycol Regenerator C Containment	SL-33	Oil & Grease	--
		Glycol	Triethylene Glycol
RFS Plant 2/3			
Building Drain Tank Containment	SL-4	Oil & Grease	--
Aqueous Urea Tank Containment	SL-5	Oil & Grease	--
		Aqueous Urea	NO _x OUT



Wild Goose Storage LLC – Pollution Prevention Plan

System/Equipment	Associated Sampling Location (SL) Number	Potential Pollutant	Trade Name
RFS Plant 4			
Building Drain Tank and Process Drain Tank Containment	SL-28	Oil & Grease	--
Aqueous Urea Containment	SL-29	Oil & Grease	--
		Aqueous Urea	NO _x OUT
Glycol Regenerator Containment	SL-30	Oil & Grease	--
		Glycol	Triethylene Glycol
Glycol Storage Containment	SL-31	Oil & Grease	--
		Glycol	Triethylene Glycol

4.2 DRAINAGE MAPS

Maps illustrating the location of the permitted facilities and discharge locations within the RWQCB service area are included in Appendix A, B, and C. Discharges at the RFS drain south across the gravel surface to the drainage ditch on the edge of West Liberty Road. This drainage flows west into Reclamation District 833 Main Drain Canal, then onto Cherokee Canal, and finally into Butte Creek. Drainage at the Well Pad Site is towards the center of the southern berm where a gate valve controls releases into a waterway in the adjacent managed wetlands of the Wild Goose Club, which eventually flows into Butte Creek.

4.3 DISCHARGE POLLUTION TYPES

Only scheduled discharges occur from WGS facility sites. No automatic or unscheduled discharges occur since all discharges occurring from WGS facilities are directly controlled by operations personnel, either by activating a manual valve or by using a portable pump. Furthermore, WGS facilities that produce stormwater discharges are not affected by emergency operations of the natural gas storage project, so no emergency discharges occur at the facility. The types of discharges, expected pollutant constituents in those discharges, duration of discharges, and control measures to reduce pollutants are described in the following section.

4.4 DISCHARGE POLLUTION ASSESSMENT

Sources of potential pollutants which may mix with stormwater, either in the subsurface vaults at the Well Pad Site or in secondary containment areas at the RFS, those potential pollutants, and control measures are discussed below.



Wild Goose Storage LLC – Pollution Prevention Plan

System/Equipment	Associated Sampling Location (SL) Number	Potential Pollutant					
		Oil & Grease	Total Suspended Solids	pH	Glycol	Methanol	Urea
Well Pad Site							
Gas Well Valve Vaults	SL-6 through SL-16 and SL-18 through SL-27	X	X	X			
Remote Facility Site, Plant 1							
Produced Water Tank Containment	SL-1	X	X	X			
Glycol Regenerator Unit Containment	SL-2	X	X	X	X		
Methanol Pumps Containment	SL-3	X	X	X		X	
SWD Pumps Containment	SL-17	X	X	X			
Glycol Regenerator C Containment	SL-33	X	X	X	X		
Remote Facility Site, Plants 2/3							
Building Drain Tank Containment	SL-4	X	X	X			
Aqueous Urea Tank Containment	SL-5	X	X	X			X
Remote Facility Site, Plant 4							
Building Drain Tank and Process Drain Tank Containment	SL-28	X	X	X			
Urea Containment	SL-29	X	X	X			X



Wild Goose Storage LLC – Pollution Prevention Plan

System/Equipment	Associated Sampling Location (SL) Number	Potential Pollutant					
		Oil & Grease	Total Suspended Solids	pH	Glycol	Methanol	Urea
Glycol Regenerator Containment	SL-30	X	X	X	X		
Glycol Storage Containment	SL-31	X	X	X	X		

4.5 Control Measures

Control measures used to minimize the risk of pollutants contacting any discharged stormwater are described below for each potential pollutant.

- Oil & Grease – Following maintenance of gas well valve vaults (caissons), tank valves, and other equipment, all oils and greases are manually cleaned from affected surfaces using conventional methods, such as rags and solvents. Between scheduled maintenance activities, visual inspections of valves and flanges are conducted routinely for any material leakage or seepage.
- Total Suspended Solids – Prior to manually releasing the stormwater to the ground, the operator inspects the contained water for evidence of an oil sheen. If a sheen is detected, absorbent pads are placed on the water surface to remove the visible sheen.
- pH – Based on analysis of previous sampling data from 2011, 2012, 2013, and 2014, subsurface vaults at the Well Pad Site, Building Drain Tank Containment area, Aqueous urea Storage Tank Containment area, and the SWD Pumps Containment area have historically reported pH levels outside of the 6.5 to 9.0 standard units (SU) range and present an increased risk of contributing basic or acidic pH levels in exceedance of receiving water limitations to waters of the United States and California. In order to minimize risks of pH exceedances, prior to discharge of contained stormwater, pH will be tested in the field through the use of a pH Meter with an electrochemical pH electrode that indicates the acidity or alkalinity of the liquid. If the pH is outside of the normal range, as described in Section VI.A.6 of the General Permit, the contained waters will be discharged to the ground where it will not enter receiving waters or removed by a vacuum truck and disposed of at an appropriate water treatment facility.
- Glycol, Methanol, and Urea – Following maintenance of tank valves and other equipment, all glycol, methanol, and urea is manually cleaned from affected surfaces using conventional methods, such as rags and solvents. Between scheduled maintenance activities, visual inspections of valves and flanges are conducted routinely for any material leakage or seepage. In the unlikely event that a spill were to occur from any tanks or containment areas at the WGS facility, WGS would implement the facility’s Hazardous Materials Release Response Plan prepared for Butte County, which is described in more detail below under Pollution Control and Waste Disposal Procedures.



5.0 PROCEDURES FOR DISCHARGES

Under the General Permit, inspection and evaluation of water contained in vaults (caissons) and containment areas is required before discharge of those waters to any receiving waters of the United States and the State of California. Discharge operations will be conducted by qualified WGS Pollution Prevention Team members and in accordance with the WGS Employee Training Program. The following sections cover the inspection, evaluation, discharge procedures, and recordkeeping activities related to discharges under the General Permit.

5.1 INSPECTION OF UTILITY VAULTS AND SECONDARY CONTAINMENT AREAS

Prior to any scheduled water discharge activities, the operator will inspect the contained water in the vaults (caissons) and secondary containment areas for evidence of an oily sheen, or for evidence of any other free-floating or suspended solid constituents. The operator will also inspect the vaults (caissons) and containment areas for the presence of any chemical odors. Visual inspection of all valves and flanges is also conducted on a regular basis between scheduled maintenance activities. Inspections are conducted by qualified WGS operations personnel, trained in accordance with the WGS Employee Training Program, and all other applicable standards.

5.2 EVALUATIONS OF WATERS CONTAINED IN UTILITY VAULTS AND SECONDARY CONTAINMENT AREAS

If oily sheen is detected by the WGS operator, oil absorption pads will be placed on the water surface to remove this visible sheen. A representative sample of the contained water, and pH level, will be taken by the operator for inclusion in the annual monitoring and reporting program documentation using approved sampling and testing methods. If the pH of the sample is outside of the range of 6.5 to 9.0, as described in Section VI.A.6 of the General Permit, or if concentrations of pollutant constituents may cause a violation of any applicable water quality objective for the receiving waters, the contained waters will be discharged to land in a way that it does not reach receiving waters or removed by a vacuum truck and disposed of in compliance with applicable regulations.

It's WGS practice that even if collected water from vaults/caissons meets the inspection and evaluation requirements discussed above, WGS will discharge collected waters to land whenever possible. WGS does not intentionally or directly discharge collected waters to receiving waters of the United States and the State of California.

5.3 WATER DISCHARGE PROCEDURES

Waters contained in vaults (caissons) that pass the inspection and evaluation procedures outlined above will not be discharged to the receiving waters in accordance with the conditions in the General Permit. As described above in Section 5.2, contained water typically recedes into the ground without requiring intervention, however, in the occasional event of high water at the Well Pad Site, a berm valve along the southern berm allows water to flow from the facility. Discharges from WGS facilities are conducted by either using manually operated pumps to remove contained stormwater, or through manually-operated drain valves allowing for gravity flow removal of water.

As previously described, discharges at the RFS drain south across the gravel surface to the drainage ditch on the edge of West Liberty Road. This drainage flows west into Reclamation District 833 Main Drain Canal, then onto Cherokee Canal, and finally into Butte Creek. Drainage from the Well Pad Site is towards the center of the southern berm where a berm valve controls releases into a waterway in the adjacent managed wetlands of the Wild Goose Club, which eventually flows into Butte Creek.

As previously discussed, all discharges occurring from WGS facilities are scheduled. WGS facilities that produce stormwater discharges are not affected by emergency operations of the natural gas storage project, so no emergency discharges occur at the facility.



Wild Goose Storage LLC – Pollution Prevention Plan

5.4 RECORD KEEPING

All records of discharges occurring under the General Permit within each Regional Water Board will be maintained at the WGS facility, and will be available for inspection by SWRCB and Regional Water Board personnel.

6.0 POLLUTION CONTROL AND WASTE DISPOSAL PROCEDURES

WGS will maintain measures and controls to ensure that waters discharged from its vaults (caissons) are in compliance with the General Permit. These measures include good housekeeping, use of oil absorption pads, preventive maintenance, spill prevention and response procedures, and sediment and erosion control. The table below provides an overview of the included BMPs, the conditions under which they will be deployed, and each BMP's advantages and limitations.

Best Management Practices Summary			
BMP	Conditions for Deployment	BMP Advantages	BMP Limitations
General Good Housekeeping	Following equipment or facility maintenance activities.	Essential to assure minimal contact of potential pollutants with stormwater.	Trace amounts of potential pollutants could remain on equipment and contribute to an exceedance of water quality standards.
Oil Absorption Pads	Prior to any discharge if an oily sheen is detected on the surface of contained waters.	Removes petroleum products ensuring a potential release does not exceed receiving water standards.	Trace amounts of petroleum products could remain in contained waters, and be released during discharge.
Preventative Maintenance	Conducted at least annually for tanks and containment valves/fittings.	Ensures proper function of facility equipment to minimize the risk of release of potential pollutants.	Potential for equipment failure between scheduled maintenance events, leading to potential release of pollutants.
Spill Prevention and Response	During the unlikely event that stored liquids escape containment areas.	Minimizes the extent of adverse environmental impacts in the unlikely event of a release.	Potential for minimal amounts of pollutants to remain in environment after spill prevention and response measures are implemented.



Best Management Practices Summary			
BMP	Conditions for Deployment	BMP Advantages	BMP Limitations
Sediment and Erosion Control	During discharges at the RFS to gravel surfaces.	Minimizes the discharge of sediment to receiving waters.	Trace amounts of sediment could be released to receiving waters during a discharge event.

6.1 GENERAL GOOD HOUSEKEEPING

Good housekeeping of all utility vaults (caissons), containment areas, and equipment is essential to assure potential pollutants are kept to a minimum. Following well head valve maintenance, oils and greases are manually cleaned from affected valve surfaces using conventional methods, such as rags and solvents. Following filling of the glycol, methanol, and urea tanks, or maintenance of the tank and containment discharge valves and other fittings, all spilled product, oils and greases are manually cleaned from affected surfaces using conventional methods, such as rags and solvents. The rags are contained and disposed of, as appropriate.

6.2 OIL ABSORPTION PADS

The use of oil absorption pads prior to discharge will ensure that releases of potential petroleum products to receiving waters are minimized. Prior to pumping or manually discharging contained stormwater to the ground, the qualified WGS operator will inspect the contained water for evidence of an oil sheen. If a sheen is detected, oil absorption pads will be placed on the water surface to remove the visible sheen. All used oil absorption pads will be contained and disposed of, as appropriate.

6.3 PREVENTATIVE MAINTENANCE

Preventative maintenance is conducted at least annually for tanks and containment valves/fittings on the various sources previously described. Water levels in the vaults (caissons) and containment areas are also monitored and inspected weekly at the RFS, when appropriate and accessible at the Well Pad Site (as inspections can be precluded by flood waters during storm events). Inspections are completed by qualified Pollution Prevention Team personnel during the rainy season. Visual inspections of tanks, valves, and flanges for leakage or seepage are conducted routinely at the Remote Facility Site between scheduled maintenance activities. Inspections are intended to determine if any maintenance or corrective action is required to reduce the risk of potential pollutants contacting stormwater.

6.4 SPILL PREVENTION AND RESPONSE

Spills are possible from storage tanks on the project. However, all tanks are inside secondary containment providing 110 percent of the capacity of the largest tank. The glycol, produced water and methanol containment structures do not have discharge valves, so all discharges are completed by pumping, thereby precluding a spill where the stored liquids could reach surface waters. The building drain and urea tank containments have discharge valves that are in the closed position and capped/bull-plugged except when manually opened for discharge of the collected stormwater. Only in the improbable case where a discharge valve is left in the open position and the cap/bull-plug missing is not installed, would a spill inadvertently occur allowing these stored liquids to escape containment. With routine inspections of the valves, as described below, and with proper employee training, a spill reaching surface waters is highly improbable. However, the facility’s Hazardous Materials Release Response Plan prepared for Butte County would be implemented in the unlikely event a spill



Wild Goose Storage LLC – Pollution Prevention Plan

were to occur. In the event of a tank leak or rupture, the containment area would be evacuated by a vacuum truck and the liquid recycled or disposed of at an authorized disposal facility. Reporting procedures established for the unlikely event of a spill are described below.

- Spills: For any oil spill which reaches a water body, the spill will be reported to the National Response Center at (800) 424-8802 (24 hours) and to Butte County Health Department consistent with the Project's Hazardous Materials Release Response Plan. The report will include a description of incidents (such as spills or other discharges), along with other information describing the quality and quantity of discharges, responsible parties, date and time of incident, weather conditions, duration and cause of spill/leak/discharge, response procedures, resulting environmental problems and persons notified.

6.5 SEDIMENT AND EROSION CONTROL

The topography surrounding the RFS and the Well Pad Site is very flat, hence there is virtually no potential for soil erosion associated with the discharges. The discharges at the RFS are to the gravel surface either by gravity or by pumps, both of which can be controlled and directed to ensure erosion does not occur. At the Well Pad Site the culvert gate valve controls the flow through the culvert to an existing wetland management waterway, and the flow rate is visually monitored to ensure the discharge does not erode the waterway.

7.0 ANNUAL MONITORING AND REPORTING

WGS implements a representative sampling and analysis program to characterize the discharges occurring from the facilities/locations described above. Samples are analyzed for oil and grease, pH, total petroleum hydrocarbons (diesel range organics and gasoline range organics), and total suspended solids. In accordance with the General Permit, WGS will also initiate a Discharge Characterization Study (Study1), as described in Section VII.C.2.a, consistent with the requirements contained in Attachment G, Discharge Characterization Studies, of the General Permit, in order to characterize discharges from WGS facilities. Samples will be analyzed for constituents described in Attachment G of the General Permit. In compliance with the General Permit, WGS will submit a Monitoring Work Plan within eight months following the effective date of the General Order, describing how Discharge Characterization Study 1 will be completed, including sample collecting procedures, sampling handling procedures, sample locations, sample analyses, and monitoring requirements. Concentrations of pollutant constituents which exceed reporting limits will be included in the Characterization Study 1 Report and Annual Monitoring Report. Concentrations of pollutant constituents which may cause a violation of applicable water quality objective for the receiving waters, will be removed by a vacuum truck and disposed of in compliance with applicable regulations.¹

Findings will be reported in an annual monitoring report, which will cover the period from May 1 through April 30. Annual monitoring reports will be submitted by WGS by June 1.

8.0 ANNUAL PLAN EVALUATION

The PLAN is designed to comply with the BAT/BCT to ensure WGS's compliance with the requirements of the General Permit. WGS will conduct an annual overall evaluation of the effectiveness of its PLAN in controlling the discharge of pollutants during a discharge event and revise the PLAN, as necessary, to address procedures and best management practices found not to be effective, whenever there is a change in operation or maintenance, or when such an amendment is necessary to ensure compliance with BAT or BCT and receiving water limits. The

¹ Discharge Characterization Study 2 is intended to determine whether dischargers that discharge to a municipal separate stormwater sewer system (MS4) owned or operated by a permittee listed in Attachment A of SWRCB Resolution 2013-0031 has potential to alter the natural ocean water quality in the area of special biological significance. WGS does not discharge to an MS4, and therefore, will not conduct Characterization Study 2.

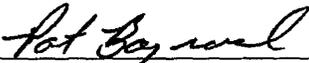


Wild Goose Storage LLC – Pollution Prevention Plan

PLAN will also be amended if it is in violation of the General Permit or has not achieved the objective of controlling pollutants in discharges to surface waters. Results of the annual PLAN evaluation will be incorporated as part of the Annual Monitoring Report described above, and in compliance with Attachment C, Monitoring and Reporting Program, of the General Permit. Records summarizing the scope of annual PLAN evaluation, personnel making the evaluation, the date of the evaluation, procedural observations related to the PLAN, and PLAN amendments will be retained in the project files for five years.

9.0 CERTIFICATION

"I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."

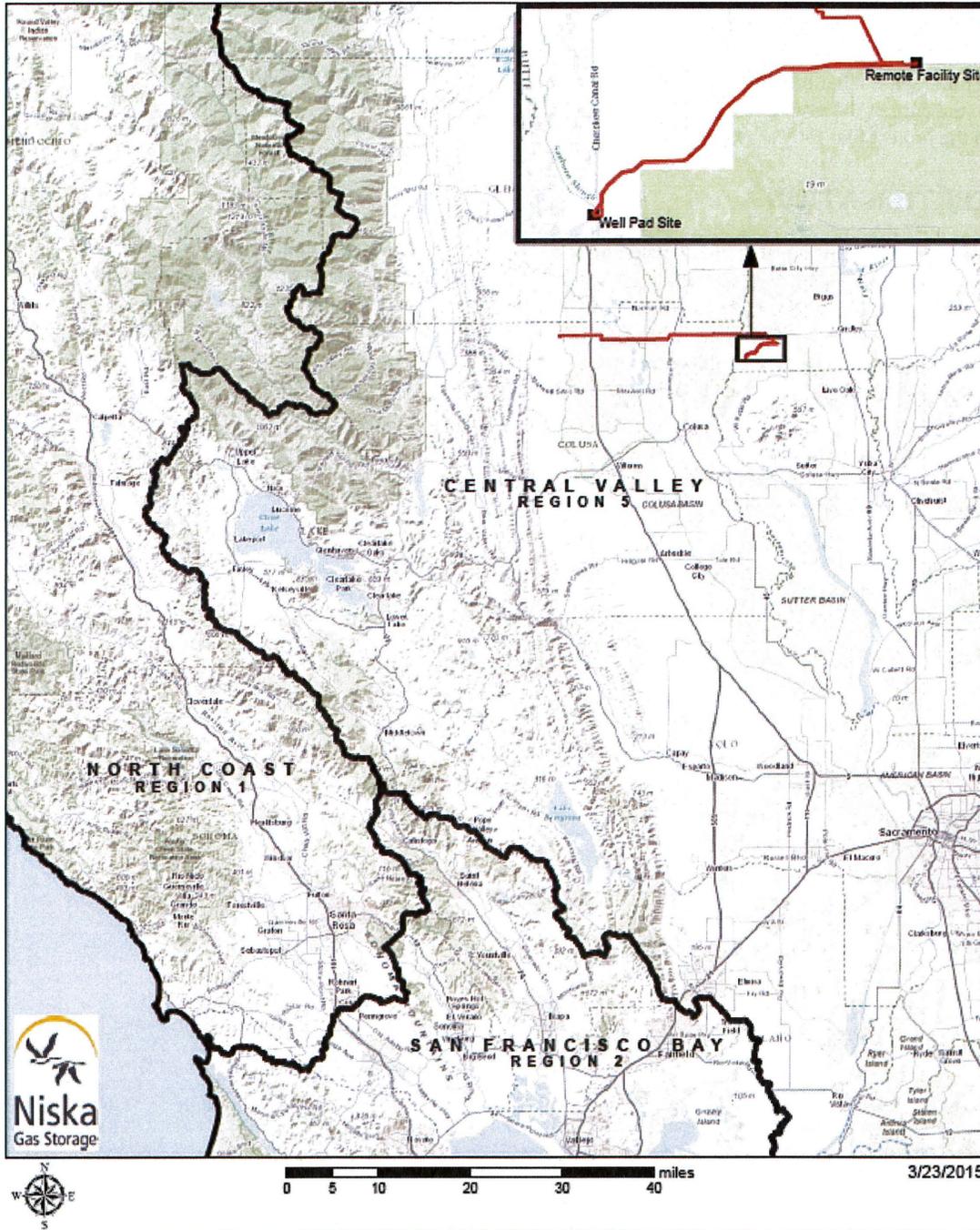


Patrick Baynard, Production Coordinator



Date

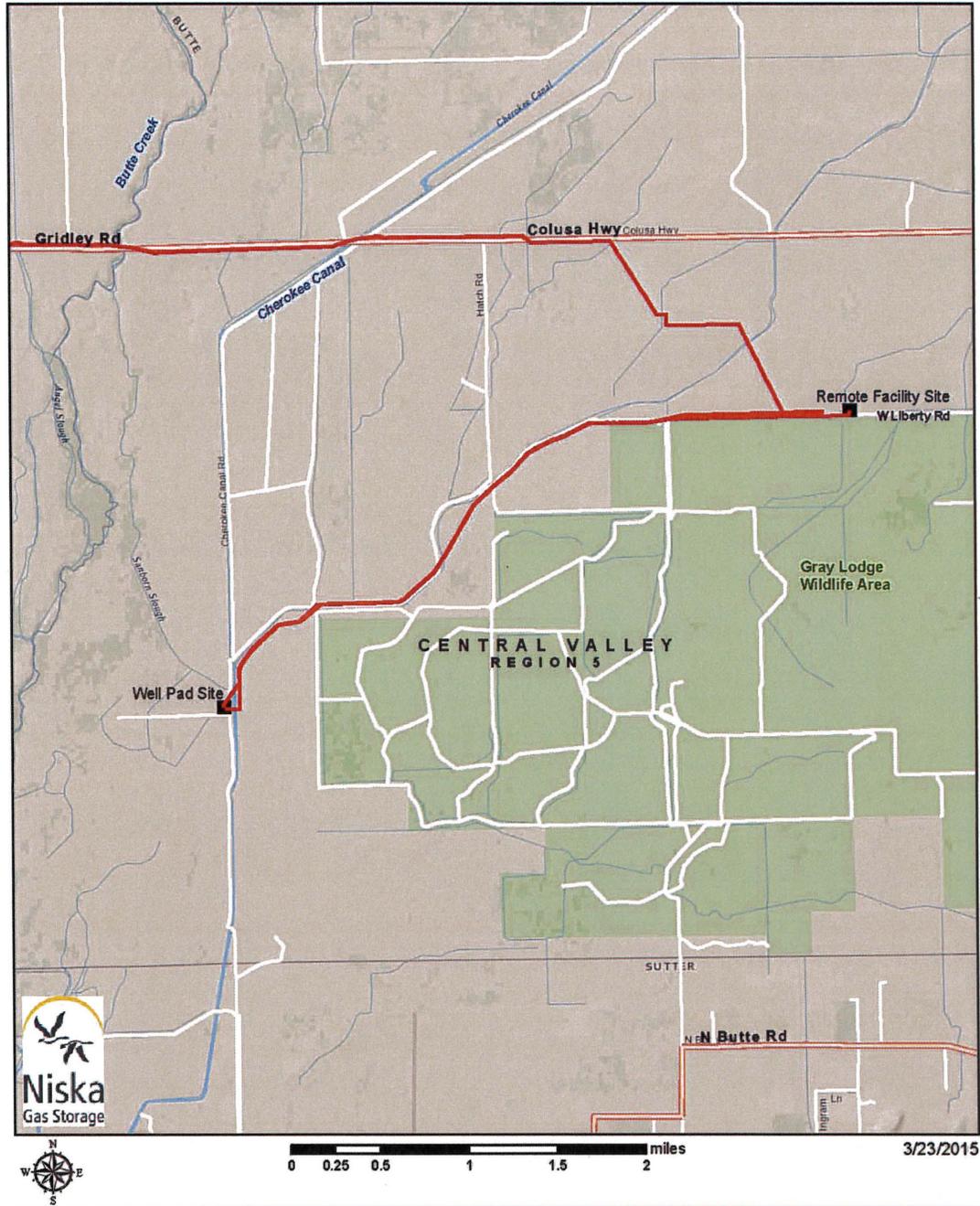
APPENDIX A – REGIONAL WATER QUALITY CONTROL BOARD (RWQCB) DISCHARGE REGION



- Discharge Locations
- Natural Gas Pipeline Alignment
- RWQCB Jurisdictions

Figure 1 - RWQCB Discharge Region
Pollution Prevention Plan
Wild Goose Storage, LLC

APPENDIX B – DISCHARGE RECEIVING WATERS



- Discharge Locations
- Natural Gas Pipeline Alignment

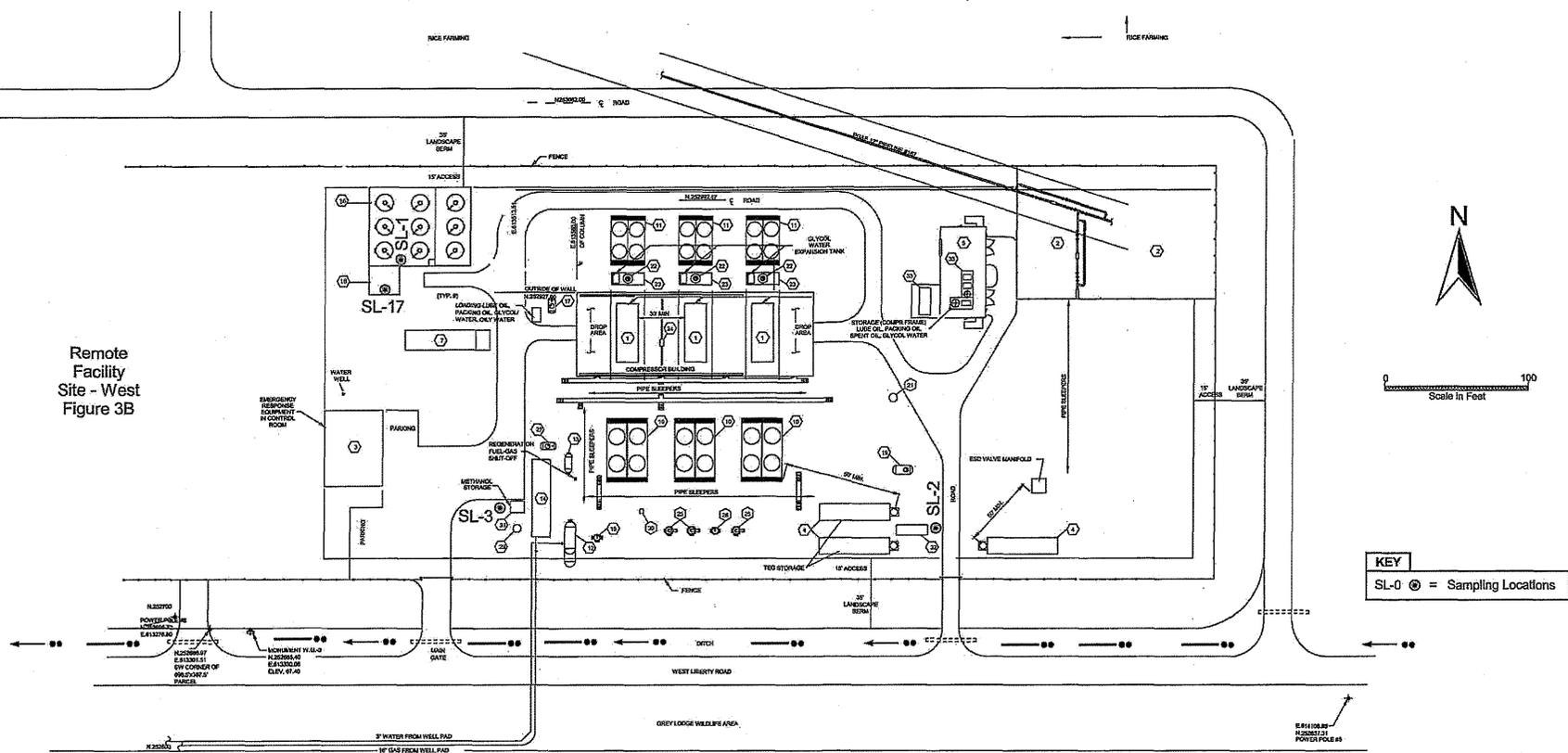
Figure 2 - Discharge Receiving Waters
Pollution Prevention Plan
Wild Goose Storage, LLC



Wild Goose Storage LLC – Pollution Prevention Plan

APPENDIX C – REMOTE FACILITY SITE AND WELL PAD SITE MAPS

Remote Facility Site - West
Figure 3B



0 100
Scale In Feet

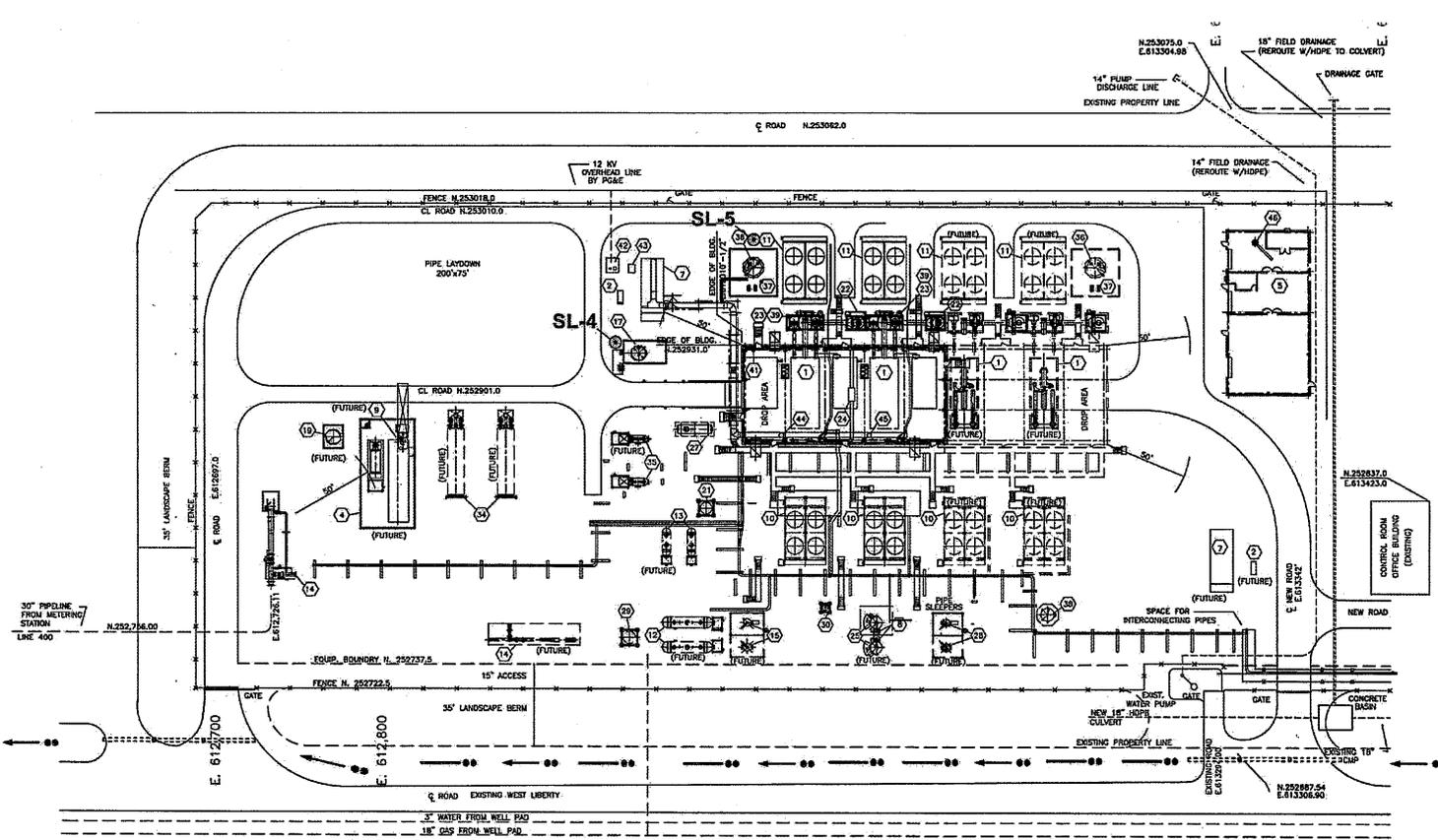
KEY
SL-0 = Sampling Locations

LEGEND

- | | | | |
|--|---|---|-----------------------------------|
| ① COMPRESSOR UNITS | ⑪ COMPRESSOR JACKET WATER COOLERS | ⑲ GLYCOL DRAIN TANK WITH SECONDARY CONTAINMENT | ⑳ GLYCOL CONTACTOR AFTER SCRUBBER |
| ② PG&E INTERCONNECTS (METER, INSTRUMENT BUILDING & ODORIZER) | ⑫ INLET SEPARATOR | ⑳ BLOWDOWN VENT SILENCER | ㉑ BLOWDOWN VENT SILENCER |
| ③ CONTROL ROOM / OFFICE BLDG. | ⑬ DISCHARGE SCRUBBER | ㉒ BLOWDOWN VENT SILENCER | ㉓ METHANOL INJECTION SYSTEM |
| ④ GLYCOL REGENERATION | ⑭ PIG RECEIVER | ㉔ ENGINE EXHAUSTS | ㉕ THERMAL OXIDIZER |
| ⑤ MECHANICAL BUILDING | ⑮ PROCESS WATER TANKS | ㉖ COMBUSTION AIR INTAKES | ㉗ INSTRUMENT AIR COMPRESSOR |
| ⑦ PDC / STAND-BY GENERATOR | ⑯ PRODUCED WATER TANKS | ㉘ OVERHEAD BRIDGE CRANE | |
| ⑩ COMPRESSOR GAS COOLERS | ⑰ OILY WATER DRAIN WITH SECONDARY CONTAINMENT | ㉙ GLYCOL CONTRACTOR TOWERS | |
| | ⑱ INJECTION WELL SKID CONTAINMENT | ㉚ PROCESS DRAIN TANK WITH SECONDARY CONTAINMENT | |

Figure 3A

Remote Facility Site - East
Sampling Locations
Pollution Prevention Plan



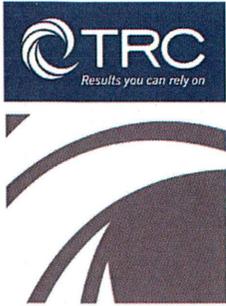
Remote Facility Site - East
Figure 3A

Key
SL-0 @ = Sampling Locations

- | | |
|--|---|
| <ul style="list-style-type: none"> ① INJECTION COMPRESSOR PACKAGE C-101AB-2 ② EMERGENCY GENERATOR 61-2 ③ DEHY REGENERATION PACKAGE U-201B-3 ④ SHOPS / WAREHOUSE BUILDING ⑤ PDC ⑥ TEG GLYCOL GAS EXCHANGER U-201A-224-1 ⑦ GLYCOL DRAIN PUMP P-303-3 ⑧ DISCHARGE GAS COOLER C-101AB-2 AT ⑨ COMPRESSOR JACKET WATER COOLERS ⑩ INLET SEPARATOR V-103-203 ⑪ DISCHARGE SCRUBBER V-103-203 ⑫ PIG RECEIVER (BY RE) V-203-2 ⑬ INJECTION COMPRESSOR PACKAGE C-101AB-2 ⑭ EMERGENCY GENERATOR 61-2 ⑮ DEHY REGENERATION PACKAGE U-201B-3 ⑯ SHOPS / WAREHOUSE BUILDING ⑰ PDC ⑱ TEG GLYCOL GAS EXCHANGER U-201A-224-1 ⑲ GLYCOL DRAIN PUMP P-303-3 ⑳ DISCHARGE GAS COOLER C-101AB-2 AT ㉑ COMPRESSOR JACKET WATER COOLERS ㉒ INLET SEPARATOR V-103-203 ㉓ DISCHARGE SCRUBBER V-103-203 ㉔ PIG RECEIVER (BY RE) V-203-2 ㉕ PROCESS GAS FILTER V-204-203 ㉖ BUILDING DRAIN TANK P-301-2 ㉗ GLYCOL DRAIN TANK F-303-3 (TEG STORAGE DURING SHUTDOWN) ㉘ COMPRESSOR AREA BLOWDOWN VENT/SILENCER X-201-2 ㉙ SCR / EXHAUST ㉚ COMBUSTION AIR INTAKES ㉛ COMPRESSOR BUILDING BRIDGE CRANE CR-101-2 ㉜ TEG CONTACTORS U-201A-201-1 ㉝ PROCESS DRAIN TANK T-302-2 (BURIED) ㉞ GLYCOL CONTACTOR AFTER SCRUBBER V-305-203 ㉟ INLET AREA BLOWDOWN VENT / SILENCER X-202-2 ㊱ DEHYDRATION AREA BLOWDOWN VENT / SILENCER X-203-2 ㊲ LINE HEATERS H-2001-3 ㊳ INLET FILTER / SEPARATOR V-101-203 ㊴ AQUEOUS UREA STORAGE TANK ㊵ AQUEOUS UREA TRANSFER PUMP P-101-2 ㊶ INSTRUMENT AIR RECEIVER V-301-2 ㊷ UREA SKID ㊸ COMPRESSOR BLDG SLUMP/PUMP P-301-2 ㊹ POWER TRANSFORMER (BY PG&E) ㊺ POWER METER PEDESTAL (BY PG&E) ㊻ START GAS VENT SILENCER X-204-2 ㊼ START GAS VENT SILENCER X-205-2 ㊽ SHOPS / WAREHOUSE JIB CRANE CR-102-2 | <ul style="list-style-type: none"> ㊾ CONTROL ROOM OFFICE BUILDING (EXISTING) ㊿ CONCRETE BASIN |
|--|---|

Figure - 3B

Remote Facility Site - West
Sample Locations
Pollution Prevention Plan



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APR 13 2015

DIVISION OF WATER QUALITY

April 8, 2015

Utility Vaults Permit Notice of Intent (NOI) – National Pollutant Discharge Elimination System (NPDES)
Wastewater Unit
Division of Water Quality
State Water Resources Control Board
P.O. Box 100
Sacramento, CA 95812-0100

To whom this may concern:

**RE: Utility Vault NPDES General Permit Discharges by Utility Companies to Surface Waters –
NOI Application – Existing Discharger Permit Renewal WDID # 9000U000059**

On behalf of Wild Goose Storage LLC (WGS), we are pleased to submit the attached NOI application package pursuant to Water Quality Order No. 2014-XXXX-DWQ – Statewide General NPDES Permit (General Permit) for Discharges from Utility Vaults and Underground Structures to Surface Waters, General Permit CAG990002.

WGS is unique in that it does not have a defined ‘service area’, but can offer its natural gas storage services to any customer based on that customer’s particular natural gas needs. Construction of the existing WGS facilities in Butte County, California, has occurred over numerous phases between April 1997 and September 2013. Development of the facility has involved the transformation of a depleted and abandoned underground natural gas field for its current use in gas storage. The entire project area is located within the jurisdiction of the Redding Office of the Central Valley Regional Water Quality Control Board. Scheduled discharges of stormwater occur from subsurface gas valve vaults located at the Well Pad Site, and from liquid above-ground tank secondary containment basins located at the Remote Facility Site. WGS does not discharge to any municipal separate storm sewer systems (MS4).

On February 10, 2000, WGS submitted a NOI to comply with the 2006-0008-DWQ General Permit terms; and on April 3, 2000, the State Water Resources Control Board issued WDID #9000U000059 in response to that NOI. WGS’s start date under the 2006-0008-DWQ General Permit was February 14, 2000. WGS respectfully requests that the State Water Resources Control Board process the enclosed NOI permit application and associated attachments for continuing coverage under the General Permit Order No. 2014-XXXX-DWQ. We appreciate your review of this information.

Contents of this Application Package:

The application package includes the following documents:

- Notice of Intent Application, provided by the State Water Resources Control Board as Attachment E of the General Permit, signed in accordance with the signatory requirements of the Standard Provisions in Attachment B of the General Permit
- Service Territory and Watershed Maps
- Pollution Prevention Plan

As WGS is an existing discharger enrolled under the General Permit Order No. 2006-0008-DWQ and applying for continuing coverage under Order No. 2014-XXXX-DWQ, we understand WGS will be billed during the regular billing cycle for any associated application fees, as outlined in the General Permit.

Please feel free to contact us at the letterhead address and telephone number should you have any questions regarding these materials.

Sincerely,



Julie D. Allison
Senior Manager/Lead Planner

Enc.

cc: Patrick Baynard, Wild Goose Storage, LLC
Kelly Baltimore, Wild Goose Storage, LLC
Gary Theberge, Wild Goose Storage, LLC