

Appendix M.3

Visual Assessment Plan

Version 1.0

February 20, 2025





UPPER MAKEFIELD RESPONSE WASHINGTON CROSSING, PENNSYLVANIA VISUAL ASSESSMENT PLAN

Version 1.0

Prepared on Behalf of:
Energy Transfer LP

Prepared By:
CTEH, LLC
5120 Northshore Drive
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February 20, 2025

	NAME/ORGANIZATION	SIGNATURE	DATE SIGNED
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1.0 Introduction and Purpose

This Visual Assessment Plan (VAP) was prepared by CTEH, LLC (CTEH) on behalf of Energy Transfer LP (Energy Transfer) and will be implemented to provide technical guidance for on-water observation and documentation in support of initial assessment activities following the Upper Makefield Response in Washington Crossing, Pennsylvania. A leak from a pipeline that transports refined petroleum products, including jet fuel, was identified in January 2025. The GPS coordinates for the approximate location of the release site (hereinafter referred to as Site) are: 40.271184, -74.875953. A map of the incident location is provided in **Attachment A**.

This VAP describes the methods and procedures that will be followed during product on-water assessment and observation as a result of the incident and associated response activities.

2.0 Health and Safety

Field personnel will review and adhere to the site-specific Health and Safety Plan (HASP). Assessment and documentation activities will only be conducted under weather and other environmental conditions that do not create an unsafe working environment. Daily tailgate safety briefings will be conducted prior to going into the field. The appropriate personal protective equipment (PPE) will be utilized for each task.

3.0 Visual Assessment Methodology

The Visual Assessment Plan utilizes a rapid methodology for visual observation and documentation of oil or product on water and on land, derived from the more detailed Shoreline Cleanup Assessment Technique (SCAT)¹. The VAP field observer will conduct field assessments on foot and utilize a mobile app to input observational data using categories that are established specifically for an incident. This categorization allows for color-coded mapping and presentation of VAP data, which allows for ease of reference and comparison of data over time.

Visual assessments will be conducted daily, as weather and water conditions allow. This frequency may be reduced as the risk of a release to water reduces and with approval from Energy Transfer. VAP surveys shall be conducted by CTEH personnel; Agency personnel may join VAP surveys at their discretion. Locations for VAP surveys shall be determined based on the flow pathway of groundwater migration from the incident site and downstream water bodies, including the Delaware Canal and the Delaware River. Locations for visual assessment observations will be in areas of easy and public access to the canal and river, such as footpaths or bridges/road crossings. Upstream locations will be selected outside the

¹ https://response.restoration.noaa.gov/sites/default/files/manual_shore_assess_aug2013.pdf

investigation area for monitoring of background conditions of each waterway. A map of proposed monitoring locations can be found in **Attachment B**.

Initial visual assessment data will be reviewed to determine whether additional or more detailed surveys will be necessary and identify potential locations for surface water and/or sediment sampling (if required).

4.0 VAP Categorization

Incident-specific visual assessment categories have been developed for the description and documentation of on-water observations. Observations will be made for product, sheen, and odor (**Table 1**).

Table 1: VAP Categorization

Value	Category	Oil or Product on Water Description
0	Ice/Snow	Unable to observe due to ice/snow
1	NOO, partial ice/snow	No observed product or sheen; partial observation due to ice/snow cover
2	NOO	No observed product or sheen
3	Sheen - Light	<10% sheen or odor
4	Sheen - Moderate	11 – 50% sheen
5	Sheen - Heavy	>50% sheen
6	Product - Light	<10% product
7	Product - Moderate	11 – 50% product
8	Product - Heavy	>50% product

5.0 Data Management

VAP data is recorded using a handheld application that electronically captures field data, including geo-spatial information, oiling categories, and photographs. These data are synchronized in real time with CTEH's data management program, allowing for utilization in data management applications, such as mapping and online data dashboards. Daily VAP data maps may be developed for presentation of observation data, if needed.

6.0 Records Management

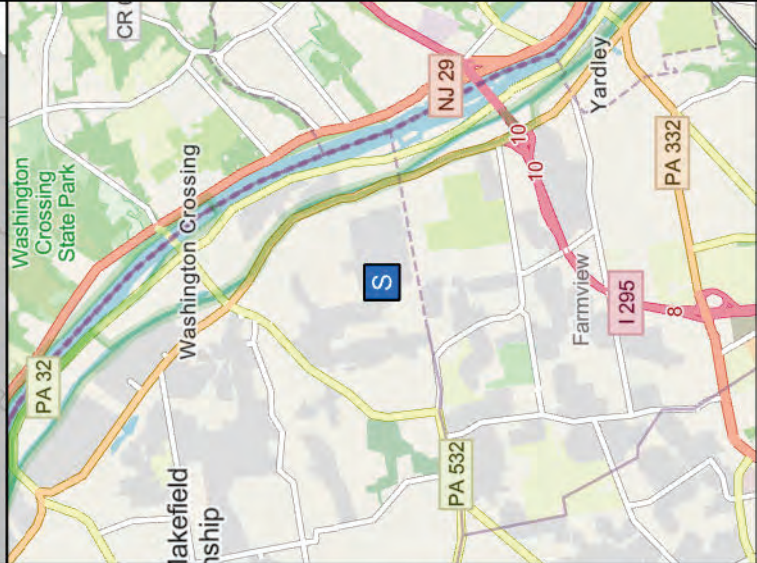
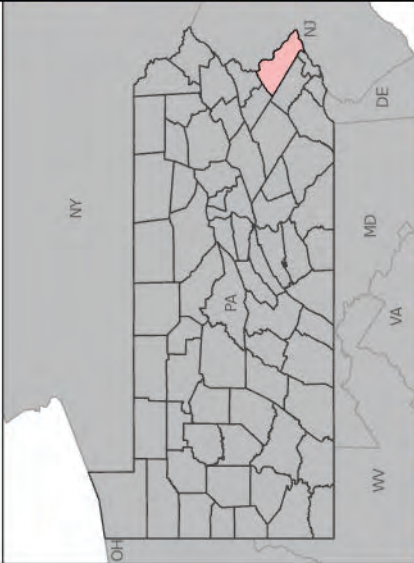
Records management refers to the procedures for generating, controlling, and archiving project-specific records and records of field activities. Project records, particularly those that are anticipated to be used as evidentiary data, directly support current or ongoing technical studies and activities, and provide historical evidence needed for later reviews and analyses, will be legible, identifiable, retrievable, and protected against damage, deterioration, and loss on a centralized electronic database. Handwritten records will be written in indelible ink. Records may include, but are not limited to, the following: bound

field notebooks on pre-numbered pages, personnel qualification and training forms, maps and drawings, reports issued as a result of the work, procedures used, correspondences, and any deviations from the procedural records. Documentation errors will be corrected by drawing a single line through the error so that it remains legible and writing the correction adjacent to the error; the change will be initialed by the individual responsible, along with the date of change.

Attachment A: Site Maps



Upper Makefield Response
Incident Location
Washington Crossing, PA | Bucks County
PROJ-051861

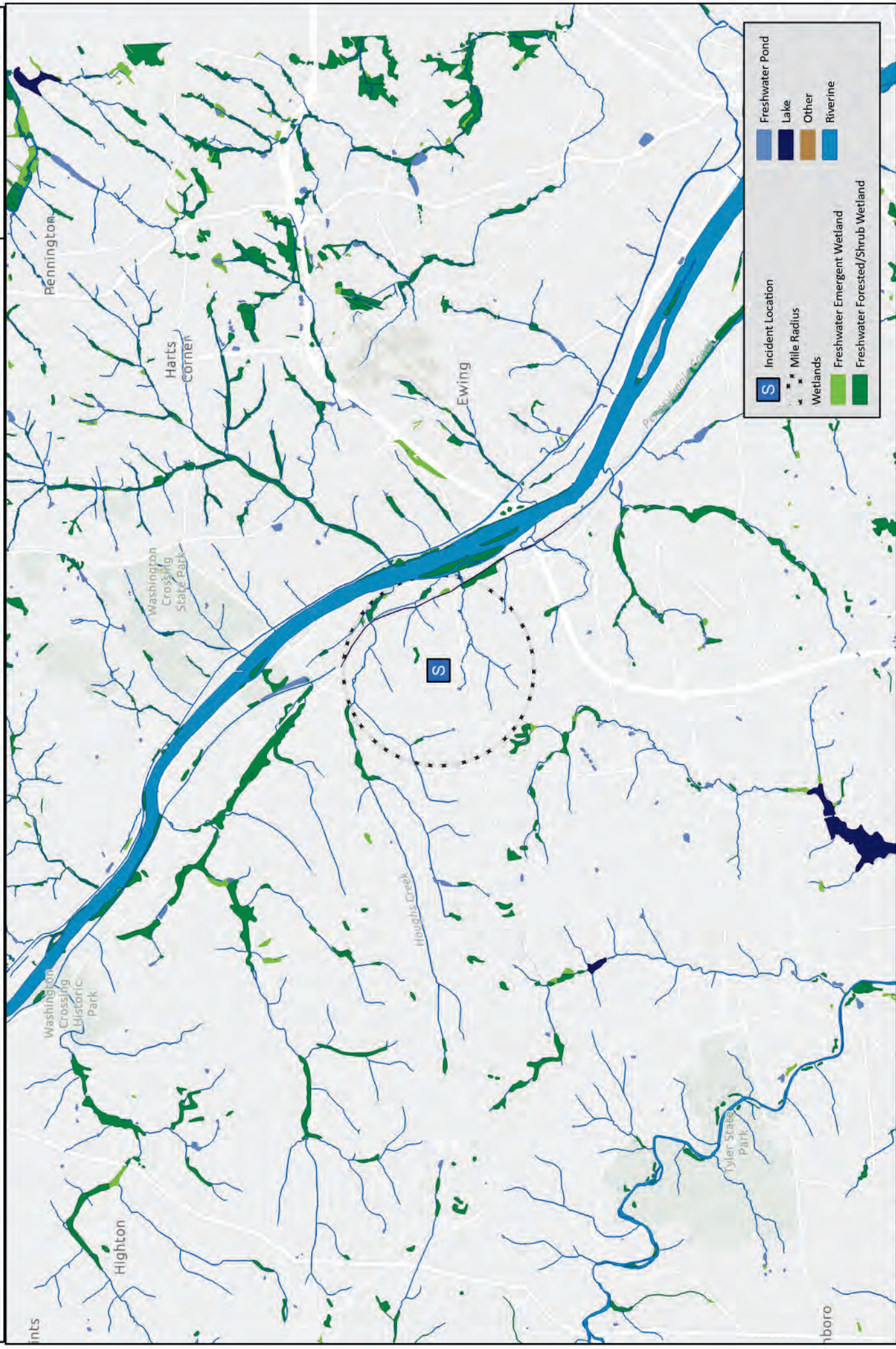


Updated At: 2/15/2025 4:18 PM
Projection: NAD 1983 2011 StatePlane Pennsylvania South
FIPS 3702 Ft US



Incident Site

Bucks County



Attachment B: Visual Assessment Locations

