



Marathon Petroleum Company LP

EMERGENCY RESPONSE ACTION PLAN

COLUMBUS, GA TERMINAL

EPA-FRP-04GA220
DOT/PHMSA MCG9

Marathon Petroleum Company
(hereafter referred to as "MPC")

5030 Miller Road
Columbus, GA 31908

Located in Muscogee County

TERMINAL, TRANSPORT & RAIL

**(Asphalt & Southern Light Products District –
Atlanta Area)**

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RESPONSE PLAN COVER SHEET (ERAP COPY)
Original is Located in the Introduction Section

General Information:

Owner/Operator of Facility: Marathon Petroleum Company

Facility Name: Columbus, GA Light Products Terminal

Facility Address: 5030 Miller Road
Columbus, GA 31908

Facility Phone Number: 706/561-0121

24-Hour Contact Number: 1/877/MAPLINE (1-877-627-5463)

(b) (7)(F)

Dun & Bradstreet Number: 15-291-3448

Date of Initial Operation: 1954

(b) (7)(F)

Number of Underground Storage Tanks: 0 Capacity (Gallons): N/A

Number of Storage Drums: 2 drums Capacity (Gallons): 11 gal.

Number of Transformers Containing Oil: 1

Total Transformer Volume (Gallons): 30 gals approx.

Number of Surface Impoundments: 0 Capacity (Gallons): N/A

North American Industry Classification System Code: 424710

(b) (7)(F)

Facility Distance to Navigable Water. Mark the appropriate line.

0 - ¼ mile X ¼ - ½ mile _____ ½ - 1 mile _____ > 1 mile _____

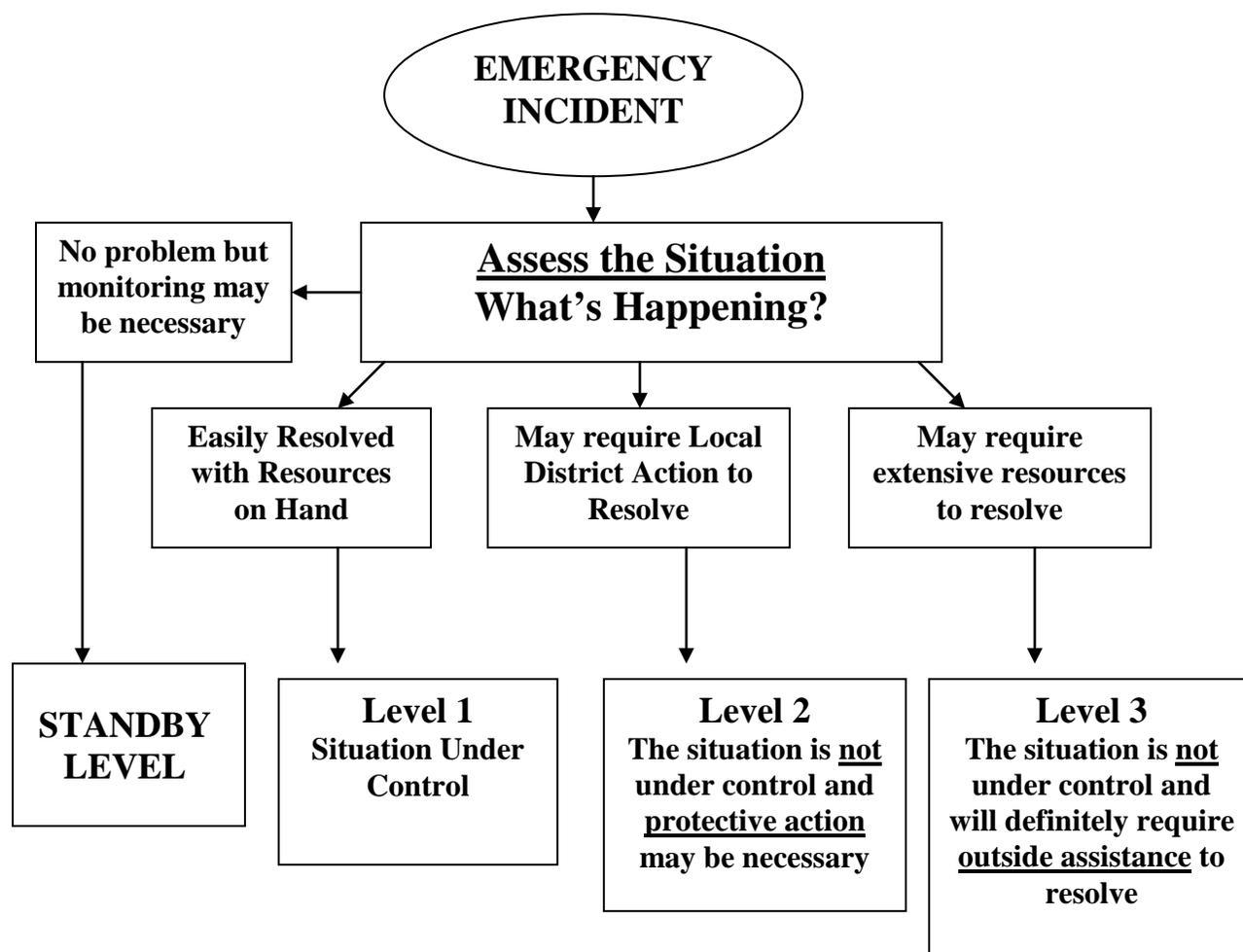
- The terminal is located adjacent to Cooper Creek.
- The “Applicability of Substantial Harm Criteria” with the signed Certification is located in the Introduction Section.

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Emergency Events and Immediate Response Actions

Emergency Event	Response Guidance
General Emergency	Response Guide A
Product Release	Response Guide B
Medical Problem	Response Guide C
Severe Weather	Response Guide D
Security or Bomb Threat	Response Guide E
Fire or Explosion	Response Guide F

MPC EMERGENCY LEVELS



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RESPONSE GUIDE A – GENERAL EMERGENCY

Action	Considerations
1. Sound the alarm.	Ensure all site personnel are accounted for and are aware of the problem.
2. Assess the situation.	What's happening? Could it get worse? Corrective action needed? Additional assistance needed?
3. Take corrective actions.	Modify operations? Shut down operations? Evacuate the facility? Call Police? Call Fire Department? Call contractor?
4. Call 1-877-MAPLINE (1-877-627-5463).	Report the problem to MPC.
5. Reassess situation.	Situation being resolved? Situation worsening?
6. Take additional corrective actions.	Modify operations? Shut down operations? Evacuate the facility? Call Police? Call Fire Department? Call contractor?

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RESPONSE GUIDE B – PRODUCT RELEASE

Action	Considerations
1. Sound the alarm.	Ensure all site personnel are accounted for and are aware of the problem.
2. Assess the situation.	What's happening? Check the MSDS. Is available PPE adequate? Could it get worse? Corrective action needed? Additional assistance needed?
3. Take corrective actions.	Protect personnel. Shut down operations? Secure ignition sources? Evacuate the facility? Call Police? Call Fire Department? Call contractor?
4. Perform containment, confinement, and control. (But only if you have monitored the atmosphere with your Multigas Detector and can do so safely without risk of exposure to the released material!)	Confine spill to piping or tank by closing valves, securing pumps, etc. Confine spill to smallest area possible by diking and damming. Control hazards to personnel by minimizing exposure.
5. Consider protective booming if water release.	See First Response Strategy Report at end of Emergency Response Action Plan (ERAP).
6. Call MPC QI listed in Notification List and 1-877-MAPLINE (1-877-627-5463).	Report the problem to MPC QI and MAPLINE (1-877-627-5463) to initiate response.
7. Assist MPC ERT in response as directed.	Complete Notification Form (Form 100). Make required notifications.

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RESPONSE GUIDE C – MEDICAL PROBLEM

Action	Considerations
1. Sound the alarm.	Radio or phone for assistance, or send someone to call EMS.
2. Remain with the injured person.	Move injured person only if imminent danger threatens.
3. Perform first aid only if you are qualified. (Note: If a chemical exposure is involved, have an MSDS ready and available for responding EMS personnel.)	Keep injured person warm and dry. Stop bleeding. Maintain breathing. Keep injured person calm.
4. Direct assistance to injured person.	Be ready to direct vehicle and personnel to location.
5. Call MPC 1-877-MAPLINE (1-877-627-5463).	Report the problem to MPC.

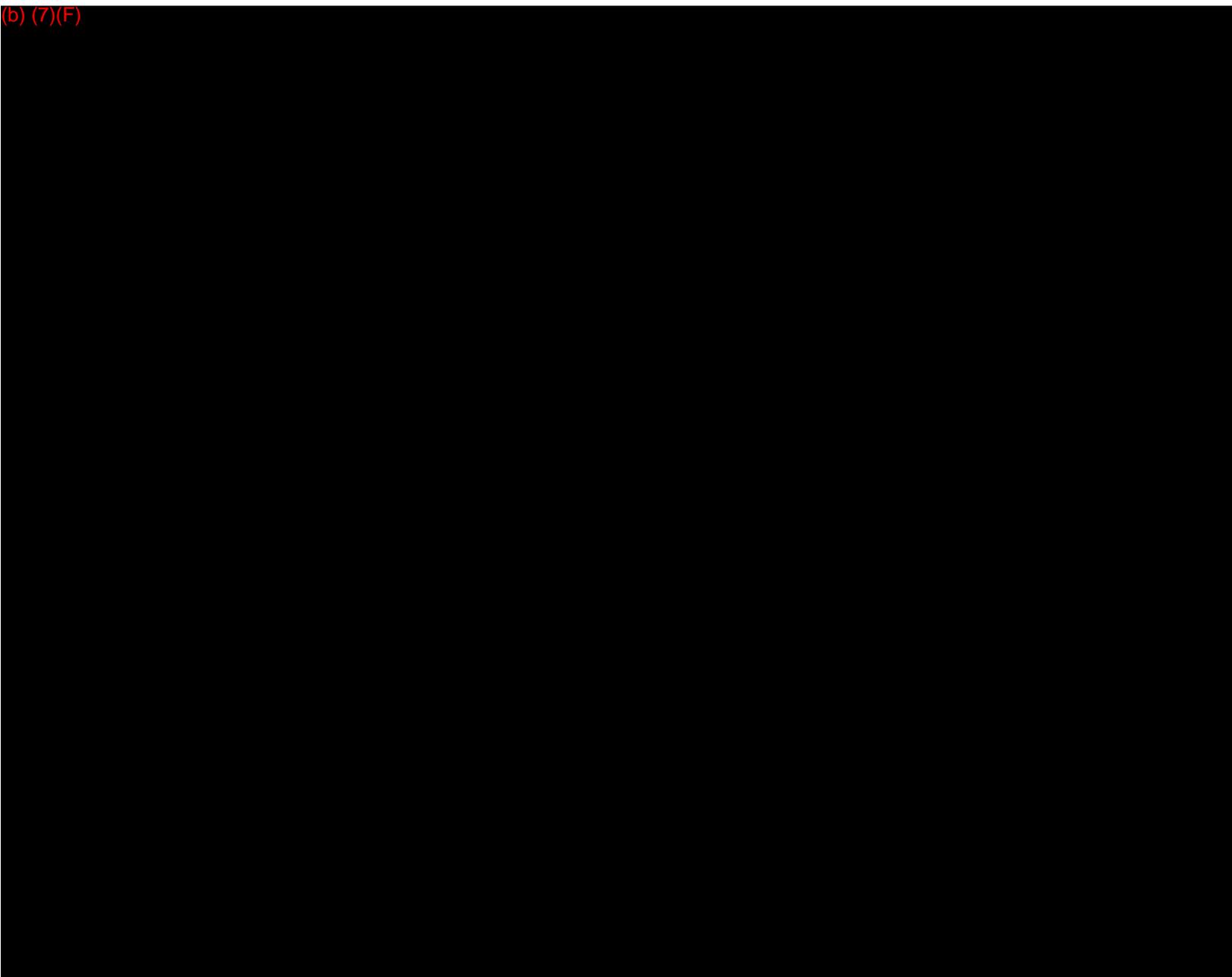
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RESPONSE GUIDE D – SEVERE WEATHER

Action	Considerations
1. When severe weather is forecast or imminent, maintain tornado/hurricane watch	Curtail or stop operations. Make preparations for severe weather. Reduce staff.
2. If a tornado or high winds occur, seek inside shelter.	Designated shelter areas available? Go there. Otherwise, seek inside room in stoutest building.
3. While inside during tornado event	Stay away from windows. Get under furniture. Protect head and neck. Put on PPE such as safety hat, safety glasses, and gloves.
4. If shelter is not available and you're caught outside	Get out of vehicle. Seek protection in ditch or alongside building. Protect neck and head. Put on PPE. Watch out for flooding.
5. After tornado has passed	Assist any injured. Watch out for downed electrical lines. Watch out for critters or stray animals. Inspect terminal for possible releases. Take head count. Call 1-877-MAPLINE (1-877-627-5463).

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(b) (7)(F)



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RESPONSE GUIDE F – FIRE OR EXPLOSION

Action	Considerations
1. Sound the alarm.	Ensure all site personnel are accounted for and are aware of the problem and depart area if not safe. Protect personnel!
2. Call Fire Department.	Report circumstances. <i>Note:</i> All fires, regardless of magnitude, must be reported to the Fire Department. You still need to notify the Fire Department even if the fire has been extinguished.
3. Assess the situation.	What's happening? Check the MSDS. Could it get worse? Corrective action needed? Additional assistance needed?
4. Take protective actions.	Protect personnel Turn off equipment Shut down operations Evacuate the facility
5. If possible, fight the fire.	Activate fixed fire fighting systems if available. Do not enter burning buildings. Use extinguishers only if trained.
6. Protect surrounding tanks and structures.	If possible move equipment.
7. Call 1-877-MAPLINE (1-877-627-5463).	Report the problem to MPC.

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EMERGENCY COORDINATOR / DESIGNATED PERSON IN CHARGE / INCIDENT COMMANDER

Name & Address	Title	Office Phone Number	Home Phone Number	24 hour / Cellular Number	Response Time
Jason Perez 8054 Garret Pines Dr. Midland, GA 31820	Terminal Manager	706/561-0121	N/A	C/954-495-1432	1 hour
Designated Alternate					
Brian Faniel 1544 Celia Drive Columbus, GA 31907	Terminal Operator	706/561-0121	N/A	C/706/615-9654	1/2 hour

When a spill or an emergency incident is discovered, it will be reported to the Emergency Coordinator/Designated Person in Charge/QI/Incident Commander who is the Terminal Manager. The Terminal Manager will take immediate action as required to mitigate the emergency and act as the QI. If the terminal manager is not available, the designated alternate will take immediate action as required to mitigate the emergency and make required notifications. If deemed necessary, the Area Manager and/or District Manager will be notified via MAPLINE (1-877-627-5463), calling directly, or paging, and in consultation with the Area Manager/District Manager, a determination will be made of the level of response required.

Via the 1/877/MAPLINE (1-877-627-5463), the emergency operator can connect all parties on a conference call.

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LIST OF QUALIFIED INDIVIDUALS

Qualified Individual					
Name & Address	Title	Office Phone Number	Home Phone Number	24 Hour/Cellular Number	Response Time
Jason Perez (b) (6)	Terminal Manager	706/561-0121	N/A	C/954-495-1432	1 hour
<u>Work Address</u> 5030 Miller Road Columbus, GA 31908					
Alternate Qualified Individual(s)					
Steve Gerschutz (b) (6)	Terminal Support Manager	478/788-2361	(b) (6)	C/813/326-5668	2 hours
<u>Work Address</u> 2445 Allen Road Macon, GA 31216-6301					

QUALIFIED INDIVIDUAL TRAINING

QIs have received OSHA 24-hour Incident Commander and/or 24-hour Hazardous Materials Technician Training; QI/IC training; participated in PREP Deployment and Spill Management Team Exercises; and received spill prevention and spill response training. Training records are maintained at the facility or office by the QI.

QUALIFIED INDIVIDUAL DUTIES & AUTHORITY

MPC has designated Qualified Individuals (QI) with responsibilities and full authorities to implement removal actions, and manage spill incidents of different volumes and magnitude. The QIs are required to have a minimum of 24 hours of HAZWOPER Training - OSHA - 29CFR 1910.126 and be familiar with the implementation of the Terminal Facility Response Plan. Qualified Individuals have authority to:

- Ensure the activation of internal alarms and hazard communication systems to notify all Terminal personnel, contract personnel, transport drivers, etc.
- Ensure the notification of all response personnel (police, fire, medical, etc.) as needed.
- Ensure the identification, character, exact source, amount, and extent of the release, as well as other items needed for notification.
- Ensure the notification of appropriate Federal, State, and local authorities, including the National Response Center, State Emergency Response Commission, and Local Emergency Planning Committee, via the Environmental Engineer or Environmental Professional.
- Ensure the assessment of the interaction of the spilled substance with water and/or other substances stored at the Terminal and ensure the communication of that information to the response personnel at the scene of that assessment.

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the release. This assessment must consider both the direct and indirect effects of the release (*i.e.*, the effects of any toxic, irritating, or asphyxiating gases that may be generated, or the effects of any hazardous surface water runoffs from water or chemical agents used to control fire and heat-induced explosion), via the Safety Specialist or Safety Professional and/or the Environmental Engineer or Environmental Professional.

- Ensure the assessment and prompt actions to contain and remove the substance released.
- Ensure the coordination of rescue and response actions as previously arranged with all response personnel.
- Use authority to immediately access company funding to initiate cleanup activities.
- Direct cleanup activities until relieved.
- Ensure implementation incident mitigation procedures.
- Ensure the notification of a ny o f t he O il S pill R esponse O rganizations (OSRO) or response contractor(s) listed in Section F in addition to any OSRO with which MPC has an Environmental Service Contract.
- Ensure notification of any Terminal Transport & Rail District Manager and Support Managers for additional support.
- Ensure a liaison relationship with the pre-designated FOSC.
- Obligate funds requested to carry out response activities.
- All MPC Q Is will comply with the requirements as set forth by Federal regulations, including:
 - Speaking fluent English
 - Located within the United States
 - Being available on a 24-hour basis
 - Being familiar with the implementation of the Facility Response Plan
 - Being trained in the responsibilities of the Qualified Individual within the Facility Response Plan

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EMERGENCY NOTIFICATION / PHONE LIST

CONTACT NAME	NUMBER
Terminal Manager/EC – Jason Perez	O/706/561-0121
Columbus, GA LP Terminal	C/954-495-1432
Local Emergency Responders	
MAPLINE Emergency Operator	1/877/MAPLINE (1/877/627-5463)
Police/Fire/Ambulance	911
Fire Department-Columbus, GA	706/653-3000
Police Department-Columbus, GA	706/653-3000
Sheriff's Department-Muscogee County	706/653-4225
Medical Facilities (From Section P)	
Medical Service, Inc.-Ambulance	706/563-2121
Medical Center Hospital	706/571-1000
St. Francis Hospital	706/596-4000
Doctor's Hospital	706/494-4262
Federal & State Agencies	
National Response Center	800/424-8802 or 202/267-2675
EPA-Region 4 (24-hour Emergency)	404/562-8700
Civil Defense/Emergency Management	706/653-3267
Georgia State Patrol	706/845-4104
State Fire Marshall	770/981-9339
Columbus Public Safety Office of Emergency Management (LEPC)	706/653-3267
OSROs	
KAM, Inc. (24-hour #) (Columbus)(AMP)	706/324-5765 or 706/324-5766
SWS Environmental First Response (24-hour #)(Atlanta; Savannah-WCD; Panama City Beach)	800/852-8878
HEPACO, Inc. (24-hour #)	800/888-7689
U.S. Environmental (Meraux)	888/279-9930
Utilities	
Electric: Local Power Company	888/660-5890
Gas: Local Gas Company	800/556-5469
Water: Local Water Company	706/649-3400
Weather and Media	
Local Radio	706/323-8255
Local TV	706/324-6471
MPC/SSA/PIPELINE	
Primary Command Post - Primary Terminal Office	706/561-0121 or 706/561-0122
Secondary Command Post(s) - Florida Rock & Tank Line Office	706/563-5671
Global Procurement	Craig Kuhlman O/419-421-4508 C/419-619-0878 Kevin Geise O/419-421-3565 C/419-306-5812

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EMERGENCY NOTIFICATION / PHONE LIST

CONTACT NAME	NUMBER
Neighboring Facilities	
Kinder Morgan	706/561-0221
Omega Partners	706/561-0160
Response Support – Aviation (From Section F)	
Total Flight	706/324-2453
Advance International, Inc.	478/788-1200
Response Support – Portable Housing Source (From Section F)	
Action Portable Buildings	706/322-6607
Banner Buildings	706/568-0500
Response Support – Potable Water Source (From Section F)	
Buck Ice & Coal Company	706/322-5451
Georgia Mountain Water	800/277-9283
Response Support – Sanitary Facilities Source (From Section F)	
Phoenix Rental Center, Inc.	334/298-9900
Environmental Partners	706/323-3660
Response Support – Fuel Source (From Section F)	
Crown Central Petroleum Corporation	706/561-0016
Fletcher Oil Company, Inc.	706/327-3297
Disposal Firms (From Section M)	
Georgia Petroleum, Inc.	229/244-9110
Aaron Oil, Inc.	229/244-9110
Transporters (From Section M)	
Holland Oil Company, Inc.	912/244-9110
Aaron Oil Company, Inc.	251/479-1616
Florida Rock & Tank Lines	706/563-5671
Container Suppliers (From Section M)	
Waste Management of GA	404/361-1182
Sandman, Inc.	706/322-6776
Communication Equipment Suppliers (From Section N)	
Radio Shack	706/324-1791
Radio Wholesale Marketing	706/561-7000
Rental Service Corporation	706/327-7407
Security Contractors (From Section O)	
Securitas	706/323-9769
Fire Fighting Services & Equipment	
Local Fire Equipment Supplier	706/653-3008
Williams Fire & Hazard Control	281/999-0276 or 409/727-2347

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INCIDENT RESPONSE NOTIFICATION FORM 100 INSTRUCTIONS

- Never include information **which has not been verified**
- **Never speculate** as to **the cause of an incident** or **make any acknowledgment of liability**
- **DOCUMENT THE FOLLOWING**
 - agency notified
 - time agency notified
 - person notified
 - content of message given
- **DO NOT DELAY reporting** due to incomplete information
- Provide as much information as possible

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Form 100 – Incident Response Notification Form

Form 100 – Incident Response Notification Form, Page 1 of 4

Columbus, GA LP Terminal

40 CFR Part 112 Appendix F 1.3.1

09/00

Caller Information				
Date	Time	Reporter's Name	Position within Company	
Reporter's Facility (address)		Facility Owned by Company	Division of Company	
Responsible Party				
Phone Number	Fax Number	Calling for Responsible Party (Y or N)	Calling for Federal Reporting Obligations (Y or N)	
Incident Description				
Date of Incident		Time	Weather	
Reason for Discharge		Incident Latitude/Longitude	Incident River Mile Post	
Incident Address/Location		Nearest City/County/State	Distance from City (Miles & Direction)	
Material Discharged (Y or N) Confidential (Y or N)		Material in Water? (Y or N)	Name of Water Body	
Container (Drum/Tank/Line, etc.)		Storage Capacity (bbl. or gal.)	Facility Total Storage Capacity	
Chris Code (Material)	Total Discharge Amount (est.)	Unit bbl. or gal.	Material in water (est.)	Unit bbl. or gal.

Initial notifications should not be delayed pending the collection of all information.ENV/RELPP/60C
TTM FRP (Form 100)CUSTODIAN: OPA Coordinator
COPY: None

REVISED: 3/2005

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Form 100 – Incident Response Notification Form, Page 3 of 4

Columbus, GA LP Terminal

40 CFR Part 112 Appendix F 1.3.1

09/00

Reporters Name	
Date	
Facility Name	
Owner's Name	
Facility ID Number	
Agency Notification NRC, USCG, EPA, State LEPC, etc.	
Agency:	Agency Person Notified: Phone Number:
Date Notified:	Time Notified:
Agency:	Agency Person Notified: Phone Number:
Date Notified:	Time Notified:
Agency:	Agency Person Notified: Phone Number:
Date Notified:	Time Notified:
Agency:	Agency Person Notified: Phone Number:
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Date Notified:	Time Notified:
Agency:	Agency Person Notified: Phone Number:
Date Notified:	Time Notified:

Initial notifications should not be delayed pending the collection of all information.ENV/RELPP/60C
TTM FRP (Form 100)CUSTODIAN: OPA Coordinator
COPY: None

REVISED: 3/2005

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Form 100 – Incident Response Notification Form, Page 4 of 4

Columbus, GA LP Terminal

40 CFR Part 112 Appendix F 1.3.1

09/00

Agency Response	
Agency on Site:	Agency Representative:
Date Arrived:	Time Arrived:
Agency on Site:	Agency Representative:
Date Arrived:	Time Arrived:
Agency on Site:	Agency Representative:
Date Arrived:	Time Arrived:
Agency on Site:	Agency Representative:
Date Arrived:	Time Arrived:
Agency on Site:	Agency Representative:
Date Arrived:	Time Arrived:
Contractor Notifications	
Contractor: Name of Contact: Time Contacted:	Comments: Arrival Time:
Contractor: Name of Contact: Time Contacted:	Comments: Arrival Time:
Contractor: Name of Contact: Time Contacted:	Comments: Arrival Time:
Contractor: Name of Contact: Time Contacted:	Comments: Arrival Time:
Company Notifications	
Contact:	Comments:
Time:	Arrival Time:
Contact:	Comments:
Time:	Arrival Time:
Contact:	Comments:
Time:	Arrival Time:

Initial notifications should not be delayed pending the collection of all information.**Send completed form to an OPA Coordinator in Findlay.**ENV/RELPP/60C
TTM FRP (Form 100)CUSTODIAN: OPA Coordinator
COPY: None

REVISED: 3/2005

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TERMINAL RESPONSE TEAM

The following personnel are Terminal employees and District employees that comprise the Terminal Response Team which is considered the Core Level I Response Team.

Columbus Light Products Terminal Response Team						
Name	Title	Office Phone Number	Home Phone Number	24 hour/ Cellular Number	Response Time	Emergency Response Duties
Jason Perez	Terminal Manager	706/561-0121	N/A	C/954-495-1432	1 hour	IC/OP
Brian Faniel*	Terminal Operator	706/561-0121	N/A	C/706/615-9654	1/2 hour	IC/OP/Plan/Log
Angela Williams	Terminal Assistant	706/561-0121	N/A	C/706/589-3656	1 hour	OP/Plan/Log
Doug Bonk	Environmental Professional	770/427-3800 x605	N/A	C/404/313-5606	2 hours	Env/Lia
Wade Callaway	Safety Specialist	770/427-3800 x615	N/A	C/419-619-8688	2 hours	Safe

*Designated Alternate

MPC's emergency response management program has adopted the Incident Command System (ICS). The ICS is compatible with the USCG Incident Management Handbook (USCG COMDT PUB P3120.17) and National Interagency Incident Management Systems (NIIMS).

MPC provides training for personnel as required by OSHA 29CFR 1910.120 and 29 CFR 1910.1200 which is appropriate for their assigned roles and responsibilities in the event of an incident.

Emergency Response Duties*

QI	Qualified Individual
IC	Incident Commander
OP	Operations Section
Plan	Planning Section
Log	Logistics Section
Fin	Finance Section
Adv	Advisor
PA	Public Affairs
Lia	Liaison
Safe	Safety
Leg	Legal

* Job descriptions for Emergency Response Duties are as described in the USCG Incident Management Handbook.

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DISTRICT RESPONSE TEAM (Company Response Team)

The following personnel are District employees and Corporate employees that comprise the District Response Team (Company Response Team). The District Response Team is considered the Core Level II Response Team.

Asphalt & Southern Light Products District - Atlanta Area Response Team (Company Response Team)						
Name	Title	Office Phone Number	Home Phone Number	24 hour/Cellular Number	Response Time	Emergency Response Duties
Kevin Miller	District Manager	419/421-3891	N/A	C/419/351-1529	12 hours	IC
Matthew Brown	District Engineer	419/421-3995	N/A	C/419/348-7573	12 hours	Plan
Foster Clark	Atlanta Area Manager	770/427-3800 x601	N/A	C/419/348-8881	2 hours	IC
Doug Bonk	Environmental Professional	770/427-3800 x605	N/A	C/404/313-5606	2 hours	Env/Lia
Wade Callaway	Safety Specialist	770/427-3800 x615	N/A	C/419-619-8688	2 hours	Safe
Jill Smith	Analyst	419/421-3755	N/A	C/567-208-1021	12 hours	Fin
Roseanne Colasante	HR Advisor	770/427-3800 X 603	N/A	C/404/313-5131	2 hours	PA
Steve Gerschutz Macon, GA Terminal	Terminal Support Manager	478/788-2361	N/A	C/813/326-5668	1 hour	QI/OP
David Mathews Powder Springs, GA Terminal	Terminal Support Manager	770/948-8550	N/A	C/404/597-1676	1 hour	OP
Craig Kuhlman	Global Procurement	419/421-4508	N/A	C/419/619-0878	12 hours	Log

MPC's emergency response management program has adopted the Incident Command System (ICS). The ICS is compatible with the USCG Incident Management Handbook (USCG COMDT PUB P3120.17) and National Interagency Incident Management Systems (NIIMS).

MPC provides training for personnel as required by OSHA 29CFR 1910.120 and 29 CFR 1910.1200 which is appropriate for their assigned roles and responsibilities in the event of an incident.

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Emergency Response Duties*

QI	Qualified Individual
IC	Incident Commander
OP	Operations Section
Plan	Planning Section
Log	Logistics Section
Fin	Finance Section
Adv	Advisor
PA	Public Affairs
Lia	Liaison
Safe	Safety
Leg	Legal

* Job descriptions for Emergency Response Duties are as described in the USCG Incident Management Handbook.

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RESPONSE EQUIPMENT LIST AND LOCATION

The following oil spill response equipment is available at the Columbus, GA LP Terminal:

Equipment	Location
Absorbent Pads (3 bundles)	Warehouse
Absorbent Boom	Warehouse
Tools	Warehouse

The equipment located at the Terminal is accessible within minutes.

This Terminal relies on contracted Oil Spill Response Organizations (OSROs) for all additional response equipment.

RESPONSE EQUIPMENT TESTING AND DEPLOYMENT DRILL LOG

- Last Inspection or Response Equipment Test Date: See the Response Equipment Inspection Log (Form 601) available online at the facility or a sample at the end of Section L.
- Inspection Frequency: Monthly
- Last Deployment Drill Date: Deployment Frequency: OSRO deploys equipment annually as indicated in the OSRO deployment letter at the end of Section F. If terminal has containment boom, deployments are performed bi-annually and recorded on PREP form 800 as outlined in Section F.
- Oil Spill Removal Organization Certification (if applicable): See Section F - USCG OSRO classification & OSRO Deployment Letter.

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EVACUATION PLAN

In the event Terminal evacuation becomes necessary, the following Plan should be followed to ensure employee/visitor safety. A nouncement of an evacuation will be made by the Terminal Manager or Designated Alternate.

It shall be the Terminal Manager or Designated Alternate's responsibility to train each employee annually on the proper evacuation procedures.

The Terminal will cooperate with local officials during any evacuation of the area. In the event of a c ommunity evacuation, t he Columbus, G A F ire D epartment will b e in c ontrol o f th e evacuation.

The following safety authorities shall be notified:

- 911 Central Dispatch
- Columbus Fire Department
- Columbus Police Department
- Muscogee County Sheriff's Department

The local public safety authorities may need to establish traffic control at:

- Intersection of Miller Road and Hodges Drive
- Intersection of Miller Road and Bishop Drive

Spill equipment and Fire Department staging areas are:

- The primary staging area will be established east of the Marathon Petroleum Company office building. The primary staging area is located inside the fenced area. If conditions exist that will not permit this area, relocating the staging area to the secondary staging area will occur.
- The alternate site for the staging area is located across Miller Road to the east about 1/4 of a mile

Evacuation centers are:

- Parking lot west of Terminal office building
- Florida Rock and Tank Lines

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Medical treatment is available at:

Medical Service, Inc.-Ambulance
706/563-2121

Medical Center Hospital
710 Center Street
Columbus, GA
706/571-1000

St. Francis Hospital
2122 Manchester Expressway
Columbus, GA
706/596-4000

Doctor's Hospital
616 19th Street
Columbus, GA
706/494-4262

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Terminal Office Building(s)

If immediate evacuation of the office area becomes necessary, use the Main Terminal office building door if possible, the alternate would be the door by the drivers restroom. Everyone should go to the mustering point, which is located in the employee parking lot, to be accounted for and receive any additional information that may be necessary for their safety.

The Terminal Manager or the Designated Alternate will be responsible for taking the head count and administering instructions.

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Entire Terminal Property

If evacuation of the entire Terminal grounds becomes necessary, employees working outside the office will be notified via a verbal announcement to immediately start taking the necessary steps in shutting the Terminal down. Personnel should immediately discontinue their current activity and report to the on-site mustering point for accountability and further instructions.

In the case of a complete evacuation of the Terminal property, the off-site mustering point is located at the Florida Rock and Tank Line Office.

In case of severe weather the Terminal's designated "shelter in place" location is the Terminal office building.

The Terminal Manager or the Designated Alternate will be responsible for taking the head count and administering instructions.

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MPC**Columbus, GA LP Terminal****Terminal Evacuation Plan
Summary Sheet**

- | | | |
|------|--|--|
| I. | Sound fire alarm. | By a verbal announcement |
| II. | Call Fire/Police Dept. | 911 – Central Dispatch, if applicable
Columbus Fire Department, Columbus
Police Department |
| III. | Extinguish fire if safe to do so. | (If fire is out of control or too dangerous,
wait at a safe distance for help to arrive.) |
| IV. | Evacuate employees and personnel vehicles. | |

THE FOLLOWING WILL BE ACCOMPLISHED BY TERMINAL PERSONNEL ONLY!

- | | |
|-------|--|
| V. | Open gates for emergency vehicles. |
| VI. | Close piping valves. |
| VII. | Essential personnel, necessary to interface with the Fire Department, move away a safe distance to await Fire Department. |
| VIII. | Non essential personnel go to the Offsite Mustering Point: |

Florida Rock and Terminal Tank Line Office
5214 Miller Road
Columbus, GA 31909
706/563-5671

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Evacuation Plan Checklist

Evacuation Plans - Columbus, GA LP

Terminal Evacuation Checklist	Priority	< 15 min	< 1 hr	< 24 hrs	> 24 hrs	Responsible Person	Completed
Power/Electrical							
Turn off Local Power (Main Disconnect) - if needed or required, Install LOTO (Safety)	1		X				
Turn Power off to from the Main Grid to the terminal - Power Company - Install LOTO (Safety)				X			
Tanks/Tank Farm							
Shut down pipeline, rail, and truck receipts	1		X				
Close Tank Valves - leave PRV's open				X			
Dike drains on horizontal tank containment - open to prevent floating				X			
Transfer Product to maintain safe inventory levels				X	X		
Fill additive tanks, if necessary				X	X		
Fuel Above Ground Re-fuel tanks, Empty Under Ground Re-fuel tanks							
Fuel Heating Oil tanks (Asphalt)							
Tank gauges - pull? Discuss with Area Mngt					X		
Pull pumps - Discuss with Area Mngt					X		
Shut down emulsion mill (Asphalt)							
Shut down polymer system (Asphalt)							
Shut down hot water system (Asphalt)							
Shut down cross linker system (Asphalt)							
Disconnect power to Cathodic Protection			X				
Tie down any tanks not in their own containment or not anchored					X		
Tie empty milk/soda containers to valves (ease in locating when flooded)					X		
Drain dike containment water, if practical				X			
Intermediate dikes - open				X			

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Evacuation Plans - Columbus, GA LP

Terminal Evacuation Checklist	Priority	< 15 min	< 1 hr	< 24 hrs	> 24 hrs	Responsible Person	Completed
Outfall Valves - ensure main outfalls are closed	1		X				
Rail							
Containment at Rail Site - are there valves to close? What to do?							
Rail Cars empty or full? - what to do							
Rail Cars offloading - shut down and disconnect							
Move the railcars off site							
Office/Computer Systems							
Raise computer equipment to higher ground				X			
Records - move to higher ground					X		
Perform back-ups of computer systems, as applicable				X			
Shut down computer systems (TAS, Lenel, Security Cameras, if applicable)				X			
Truck Rack							
Turn off Rack Sales - contact SD&P to make notification	1		X				
Disable Fire Suppression System and close valves - Foam tank, dry chemical			X				
Plug rack trench drains/offload areas				X			
Oil Water Separator - pump out oil side, close valves, install sewer plugs					X		
WAT/Holding Tank - Close valves, then on , Above Ground, fill up, Below Ground, leave alone					X		
Meter Preset boards - pull					X		
Scales (Asphalt) - leave in place							
Vapor Recovery/Combustor Units - Terminal							
Shut down the VRU/VCU - push the E-stop button	1		X				
Hot Oil Heaters (Asphalt) - shutdown and isolate hot oil valves							
Shut down Boilers (Asphalt)	1						
Shut down steam system (Asphalt)	1						

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Evacuation Plans - Columbus, GA LP

Terminal Evacuation Checklist	Priority	< 15 min	< 1 hr	< 24 hrs	> 24 hrs	Responsible Person	Completed
Shut off assist/enrichment gas, if applicable				X			
Facility - Security							
Secure and lock the facility - gates, offices, warehouses, etc.	1		X				
Security cameras need disconnected? Considered but not applicable							
Facility - Misc.							
Frac Tanks/Roll Offs - move to higher ground					X		
Ensure storm water drains are clear of debris				X			
Secure loose equipment, drums, etc that are stored outside (Waste Storage)				X			
Move electronic testing room equipment to higher ground					X		
Move polymer boxes to safe and secure spot							
Move terminal trucks, equipment to higher ground				X			
Spill Response Equipment - location - will it be accessible?							
Warehouse - clean out if time permits					X		
Environmental Issues							
Agency notification needed? (filling tanks with river water, dike water)					X		
POTW notifications needed?					X		
Post Evacuation Activities (pre planning)							
Put Logistics, Contractors, Equipment on standby					X		

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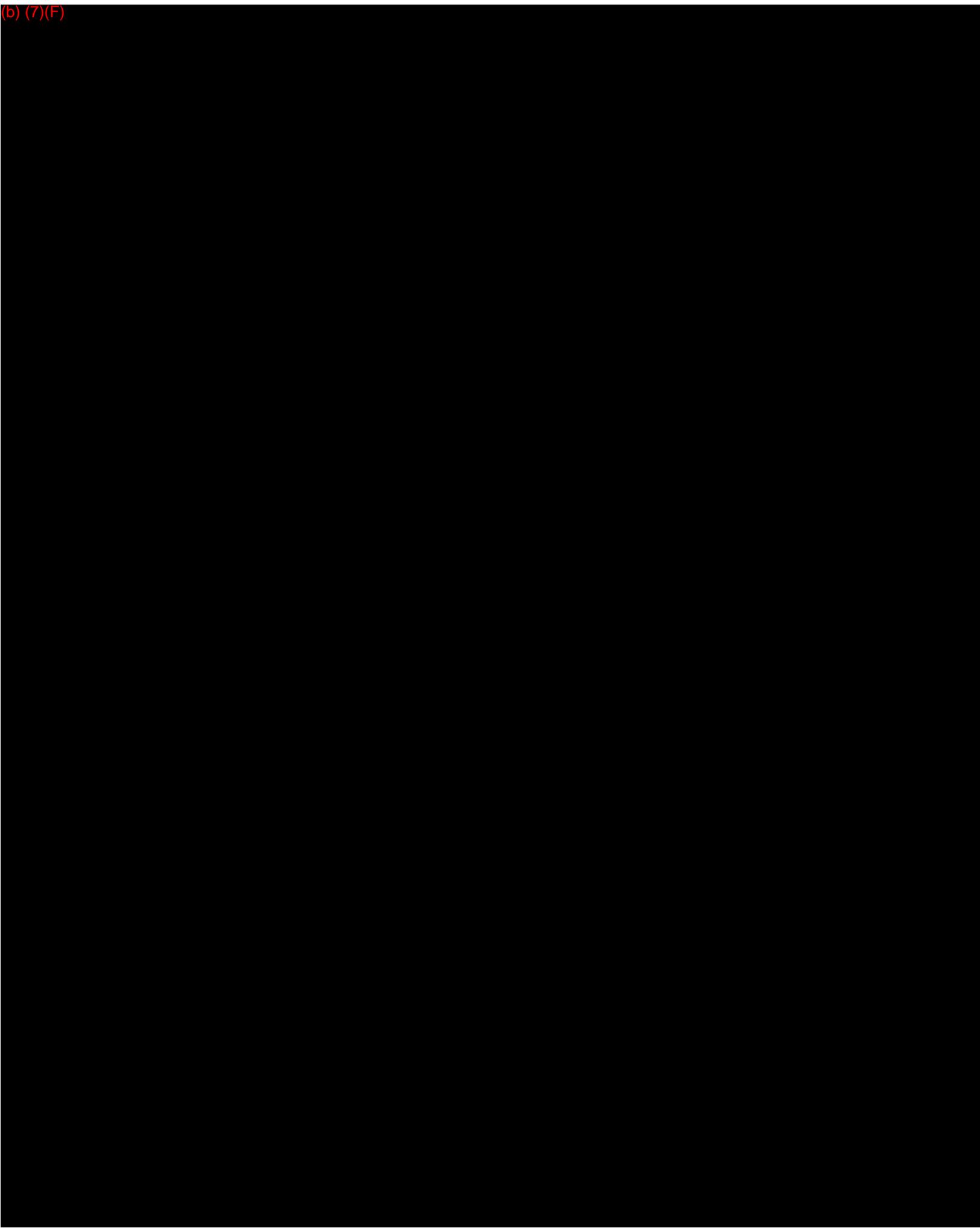
Evacuation Plan Considerations

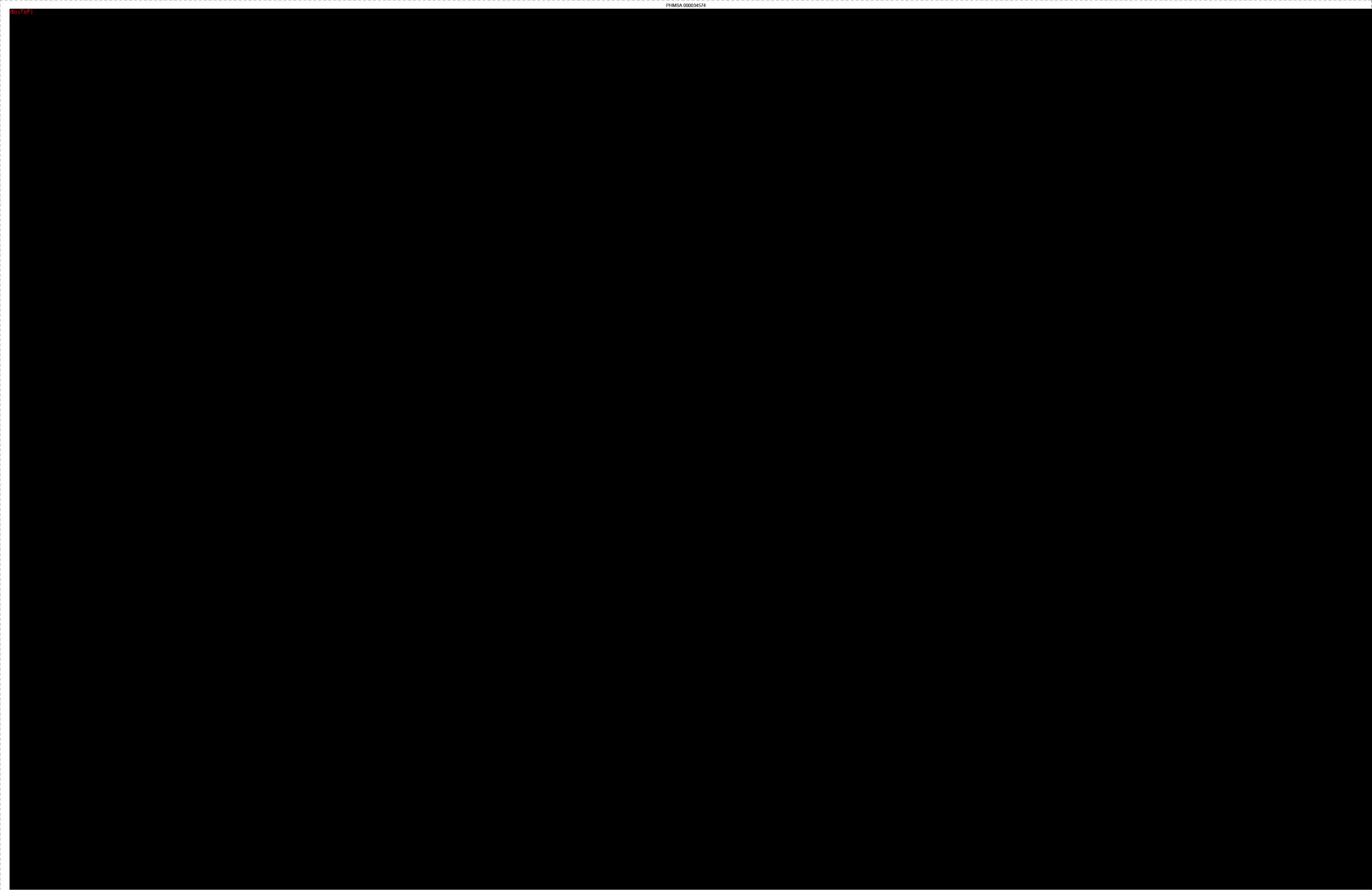
No.	EPA Evacuation Plan Considerations	MPC Terminal Responses
1.	Location of stored materials	Primary material stored in tankage is gasoline, ethanol, and light petroleum products such as diesel fuel. Evacuation routes are away from the storage tanks toward Miller Road.
2.	Hazard imposed by spilled material	Gasoline and ethanol are flammable. Diesel is combustible. All are hazardous from inhalation, contact, and ingestion. Evacuation routes are away from the storage tanks.
3.	Spill flow direction	Spills would flow to the west and then SSW in Cooper Creek.
4.	Prevailing wind direction and speed	Winds are from the ENE Nov - Feb, from the NW Mar - Apr, from the WNW May - June, from the S Jul - Aug, and from the E Sep - Oct, all between 6-8 mph.
5.	Water currents, tides, and wave conditions (as applicable)	Cooper Creek, a small creek that passes adjacent to the terminal, is not considered a factor in any evacuation.
6.	Arrival route of emergency response equipment and personnel	Emergency personnel and vehicles would arrive on the north side of the terminal at the entrance gate on Miller Road. Personnel would evacuate out the gate onto Miller Road.
7.	Evacuation routes	Evacuation routes are towards the north through the main gate and are indicated on The Evacuation Diagram.
8.	Alternative routes of evacuation	In an emergency, terminal personnel could also evacuate through several gates located around the terminal.
9.	Transportation of injured personnel to nearest emergency facility	Local medical facilities are indicated on page E-3.
10.	Location of alarm/notification systems	A description of the terminal alarm and notification system is found on page E-11.
11.	The need for a centralized check-in area for evacuation validation (roll call)	An initial evacuation location has been established in the parking lot on the west side of the building. A secondary evacuation location has been established at the Florida Rock & Tank Lines approximately ¼ mile east of the terminal on the north side of Miller Road.
12.	Selection of a mitigation command center	Initially the terminal office, and if evacuation is necessary, then at Florida Rock & Tank Lines.
13.	Location of shelter at the facility as an alternative to evacuation	The terminal office building has been established as the designated "Shelter-in-place" location.

NOTE: In the event of a community evacuation, the Columbus, GA Fire Department will be in control of the evacuation.

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FIRST RESPONSE STRATEGY REPORT

(Following Pages)

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Marathon Petroleum Company LP

First Response Strategy Report

4 to 6 hours "Outside the Fence"

Marathon Petroleum Company LP – Columbus, GA Light Products Terminal

5030 Miller Road

Columbus, GA 31908

Located in Muscogee County

(b) (7)(F)

Date Prepared: May 28, 2012

Scope:

This "First Response Strategy Report" was developed to assist Marathon Petroleum Company LP (MPCLP) in addressing initial response activities and objectives that should be included with the Emergency Response Action Plan (ERAP) for the Terminal facility located in Columbus, GA.

This report is based on observations and analysis gathered during a site visit conducted on March 28, 2012.

The key objectives of this report are to:

- Assess likely routes and flow patterns of uncontrolled releases that escape beyond the MPCLP facility's perimeter, considering primarily the first 4-6 hours of a release and assuming a large (worst case) discharge,
- Assess and locate the best possible points for initial containment and collection of uncontrolled releases based on the likely flow patterns identified,
- Identify other key issues that could impact the first response efforts (i.e. environmental and/or economically sensitive areas, evacuation requirements, traffic control issues, etc.)

Overview of the Columbus, GA Light Products Terminal site:

The Columbus, GA, Light Products ("LP") terminal is located in an area bordered by a wooded area and a railroad line (railroad recently removed), with a primary drainage flow pathway that travels near residential communities. The facility is a petroleum storage and distribution terminal which receives refined petroleum products by pipeline and tank truck, stores petroleum

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First Response Strategy Report – Columbus, GA LP Terminal

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products in oil storage tanks, and discharges those products by tank truck. Products stored on site include gasoline, diesel oil, additives, additive dyes, transmix and ethanol.

(b) (7)(F)

and which is used to store gasoline.

The topography of the facility presents a high point at the northeast corner of the facility and the primary flow path from the facility runs to the south by way of Cooper Creek. All large above-ground storage tanks at the facility are located within containment areas capable of holding the contents of the tanks in the event of a spill (CA-1). Drainage from these containment areas is serviced by means of valves which are maintained in a closed position, with specific procedures in place to exclude the discharge of contaminated water (i.e., procedures associated with NPDES outfall operation).

Flow from the facility will travel southward, with all drainage pathways leading to Cooper Creek, which flows south. Once product reaches Cooper Creek it will be conveyed along the creek until it enters Cooper Creek Reservoir (located in a public park just south of the facility). The reservoir would act to contain product for some period of time, but in its southeast corner there is an open outfall (catch basin) which would allow floating contaminant to pass if not closed off by appropriate municipal authorities. Product passing through this outfall would re-enter Cooper Creek, which passes through residential areas as it continues to flow. At a point upstream of St. Mary's Road (refer to Action Point #10 below) Cooper Creek empties into Bull Creek, a more substantial waterway which continues to flow southward. Bull Creek eventually empties into the Chattahoochee River at a point eastward of 22nd Street and Highway 27 in Columbus, GA.

Based on this flow path, an effort should be made to quickly mount response operations in areas nearer the facility, specifically at Action Points #1 through #4 (i.e., up to the outfall on the Cooper Creek Reservoir). By containing a spill to this area responders would significantly reduce the logistic requirements for a response and lessen exposure to the public by restricting impact to residential areas. The Cooper Creek Park, which includes Action Points #2 through #4, provides ample space for personnel and equipment staging, and the trajectory of the spill is likely to slow as the product would need to make its way across this widened water body.

The Columbus, GA LP Terminal flow potentials:

All tanks are located within earth berms affording appropriate containment of tank contents. However, in order to address the possibility of a spill breaching containment dikes at the facility all perimeter fence lines were inspected and potential flow paths associated with spills crossing the perimeters were considered, described and analyzed in the text, diagrams and figures.

Flow Scenario One – North Side

The northern perimeter of the terminal is bounded by Miller Road, with a significant slope

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formed from the northeast corner westward to the northwest corner. Product crossing the north fence line would enter into the surface drainage ditch adjacent to the roadway and rapidly move downhill (west) to enter into the small, unnamed creek that is located there. Product entering this creek would be conveyed southward to Cooper Creek

Response Strategies Associated with the North Side – (Note: Please refer to “General Response Strategies” section below for a comprehensive review of response strategies referred to in this report). Berms or underflow dams, constructed of sand, clay or other appropriate materials should be installed along the drainage ditch to perform containment. Recovery operations could take place using vacuum recovery systems such as vacuum trucks or tankers, skimmers, or similar methods, with smaller pockets of residual product, or small spills, being addressed using suitable absorbent materials. It should be noted that appropriate traffic control measures would be needed to mount a response operation in this area.

Flow Scenario Two – South Side – Primary Flow Path

Spills crossing the southern perimeter fence line will enter into a densely wooded area behind the facility, move along surface flow pathways, settle into low-lying areas and eventually into Cooper Creek. Once product enters the creek it will follow the pathway described above, which eventually leads to the Chattahoochee River. During any spill event from this facility, responders should mobilize to Action Point #1, which is located at the point where Cooper Creek passes under Milgren Road just south of the facility. If the leading edge of the spill has not reached this area, set containment booms here and continuously monitor for contamination while working at points upstream. If the leading edge has passed this location, responders should move to Action Points downstream until the leading edge is contained.

Response Strategies Associated with South Side – At points upstream of Action Point #1, trenching and berming would be employed in order to contain the product in the wooded areas before it reaches Cooper Creek. Once working on the creek, small (6”) and then standard size (18”) containment booms would be used. To gain access to the creek various methods for shoring will be required (i.e., ladders and or access pathways). Responders would likely need hip waders to work in shallower areas, and small boats could be used in areas where the creek is deeper. As the creek moves southward its flow velocity and volume increases, and during high-water events areas of significant flood stage were evident during the survey. It is likely that during high flood stage response operations on these waterways would be significantly impaired (although operations on the reservoir would remain fairly stable under most conditions). Recovery operations would follow suit as described above and below.

Flow Scenario Three – East Side

A wooded area and a railroad line bound the eastern perimeter of the facility. A spill crossing the eastern fence line would flow southward to join the south flow path.

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Response Strategies Associated with the East Side/Primary Flow Path – Containment along the surface drainage routes would consist of berming and/or trenching operations. Recovery operations would follow suit to the other perimeters.

Flow Scenario Four – West Side

As with the east perimeter, the west side of the facility includes a wooded area. Material crossing this fence line would migrate westward through the wooded area to the small, unnamed creek, and then be conveyed southward to Cooper Creek.

Response Strategies Associated with the West Side - Containment along the surface drainage routes would consist of berming and/or trenching operations. Recovery operations would follow suit to the other perimeters.

Initial Response: Containment and Recovery Points (First 4-6 Hours of Incident)

General Notes on Response Options:

Several options are common to all spill pathways associated with this site.

Containment: On hard land surface areas, the use of sand or clay berms (or similar materials) should be employed to contain a spill. In softer ground the option for trenching becomes viable. Such methods are particularly important when sewer inlets are present, which should be bermed or protected with sewer mats to avoid unnecessary contamination (no sewer outfalls were seen during the survey). When ditches, drains or creeks are involved, containment techniques would include the use of small and medium sized oil containment booms (6" to 18"), underflow dams (low flow conditions) and berms (low flow conditions - usually requiring pumps to evacuate water collection without releasing oil). When subsurface conduits are involved sewer plugs can be used (but may require that bypass pumps are installed upstream of contamination to deal with the normal water flow through the pipes).

Recovery: The recovery of spilled petroleum is normally performed using vacuum trucks or tankers, by means of skimmers (suction/weir, drum, rope mop, etc.), using pumps or by means of absorbent devices (booms, pads, pom-poms, etc.). Other means may require excavation (product which has seeped into the ground or sediments on shorelines) or the recovery of contaminated vegetation and debris (manually or using mechanical devices). Other methods that are used less often include bioremediation strategies, dispersion and/or insitu burning. These last methods are far less common, particularly as first response options, and are not considered in detail in this report.

Low Flash Materials (Gasoline, etc.): The containment and recovery of low-flash products (Gasoline, etc.) should be handled with extreme caution. The use of booms and other containment devices must be undertaken only after a thorough analysis of the risks involved has been performed. In certain cases it may be advantageous to allow low-flash materials to naturally evaporate or otherwise dissipate as opposed to collecting

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them in large pools without the ability to prevent the possibility of ignition. Booming gasoline or other low-flash products must be considered on a case-by-case basis. Recovery operations involving low-flash products should only be undertaken using spark-proof tools and special procedures, and all transfer equipment should be properly grounded and bonded prior to and during use. An important component of responding to a low-flash incident will involve restricting access to contaminated sites to reduce the risk to responders and the public. Low-flash spills may necessitate evacuations and traffic restrictions due to the presence of hazardous vapors.

Ethanol: Note on Ethanol Response measures: Two critical points must be understood regarding spill response practices for the product Ethanol. The first is that Ethanol, as stored at bulk facilities, is mixed with 5-15% unleaded gasoline. The second is that pure Ethanol is entirely soluble in water. With these principles in mind, MPC LP recommends that an Ethanol spill be treated using the same basic principles as a gasoline spill (see “low-flash products” note above). However, once Ethanol impacts a large water body, responders should understand that the main volume of the spill will eventually become mixed with the water body (with the remaining percentage in turn reacting similarly to gasoline when it enters a water body).

Table 1 - Action Points Associated with this Facility (refer to maps for locations of these sites):

Action Point	GPS	Description of Site and Recommended Strategy	Map No.
1 N32	(b) (7)(F)	<ul style="list-style-type: none"> Cooper Creek as it passes under Milgren Road. Strategy: Install small booms; vacuum trucks, skimmers or absorbent materials for recovery Traffic control See Figure 7 	1
2 N32		<ul style="list-style-type: none"> Cooper Creek running through Cooper Creek Park along the Dick Collier Memorial Trail (upstream of reservoir) Strategy: Install booms; vacuum trucks, skimmers or absorbent materials for recovery. Large areas for operations and equipment staging available See Figure 8 	1
3 N32		<ul style="list-style-type: none"> Cooper Creek Reservoir Strategy: Product likely to move slowly on large, wide open water area. Install booms to prevent migration westward and direct product to appropriate recovery points; vacuum trucks, skimmers or absorbent materials for recovery. See Figure 9 	1

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4 N3	(b) (7)(F)	<ul style="list-style-type: none"> • Outfall (catch basin) at southwest corner of reservoir. During normal operation product can pass through catch basin • Strategy: Contact appropriate municipal authorities and close flow (if possible). Install booms to isolate outfall and prevent floating contaminants from entering; vacuum trucks, skimmers or absorbent materials for recovery. • See Figures 10 & 11 	1
5 N3		<ul style="list-style-type: none"> • Cooper Creek at Northwood Avenue • Strategy: Install small booms to perform containment; vacuum trucks, skimmers or absorbent materials for recovery. • Residential area • Traffic Control • See Figure 12 	1
6 N3		<ul style="list-style-type: none"> • Cooper Creek at Reese Road (access from Guinevere Road) • Strategy: Install small booms to perform containment; vacuum trucks, skimmers or absorbent materials for recovery. • Residential area • Traffic Control • Note: Unstable shorelines will require shoring or other means of supporting response operations (i.e., ladders, etc.); Heavy vegetation lining shoreline must be cleared to support response operations. Limited access. • Figure 13 	1
7 N3		<ul style="list-style-type: none"> • Cooper Creek at Conisburgh Way • Strategy: Install small booms to perform containment; vacuum trucks, skimmers or absorbent materials for recovery. • Residential area • Traffic Control • See Figure 14 	1
8 N3		<ul style="list-style-type: none"> • Cooper Creek at Macon Road • Strategy: Install booms to perform containment; vacuum trucks, skimmers or absorbent materials for recovery. • Traffic Control • Note: Unstable shorelines will require shoring or other means of supporting response operations (i.e., ladders, etc.); Heavy vegetation lining shoreline must be cleared to support response 	1

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		operations. Limited access. • Figure 15	
9 N3	(b) (7)(F)	<ul style="list-style-type: none"> • Cooper Creek at Forest Road • Strategy: Install booms to perform containment; vacuum trucks, skimmers or absorbent materials for recovery • Traffic Control • Note: Unstable shorelines will require shoring or other means of supporting response operations (i.e., ladders, etc.); Heavy vegetation lining shoreline must be cleared to support response operations. Limited access. 	1
10 N3		<ul style="list-style-type: none"> • Bull Creek at St. Mary's Road • Strategy: Install booms to perform containment; vacuum trucks, skimmers or absorbent materials for recovery. • Residential area • Traffic Control • Note: Unstable shorelines will require shoring or other means of supporting response operations (i.e., ladders, etc.); Heavy vegetation lining shoreline must be cleared to support response operations. Limited access. 	2
11 N3		<ul style="list-style-type: none"> • Bull Creek at Cusetta Road • Strategy: Install booms to perform containment; vacuum trucks, skimmers or absorbent materials for recovery • Traffic Control • Note: Unstable shorelines will require shoring or other means of supporting response operations (i.e., ladders, etc.); Heavy vegetation lining shoreline must be cleared to support response operations. Limited access. 	2
12 N3		<ul style="list-style-type: none"> • Bull Creek at Highway 27 • Strategy: Install small booms to perform containment; vacuum trucks, skimmers or absorbent materials for recovery • Traffic Control • Note: Unstable shorelines will require shoring or other means of supporting response operations (i.e., ladders, etc.); Heavy vegetation lining shoreline must be cleared to support response 	2

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	(b) (7)(F)	<ul style="list-style-type: none"> operations. Limited access. Figures 20 & 21 	
13 N3		<ul style="list-style-type: none"> Bull Creek as it enters the Chattahoochee River (accessed via Riverwalk entrance at 22nd Street and Highway 27 – or via water route on the Chattahoochee River) Strategy: Install booms to perform containment; vacuum trucks, skimmers or absorbent materials for recovery. Note: Unstable shorelines will require shoring or other means of supporting response operations (i.e., ladders, etc.); Heavy vegetation lining shoreline must be cleared to support response operations. Limited access. Figures 22, 23 & 24 	

Environmentally and/or Economically Sensitive Areas

Environmentally Sensitive Areas

Refer to Facility Response Plan; some evidence of wildlife present during survey.

Economically Sensitive Areas

If the spill involves a low flash product residential and commercial areas, as well as high traffic roadways and railroads, could become impacted and require evacuation.

Miscellaneous Observations: Action Items

During the 3/28/12, the MPC evaluator (B. Hazel) made the following suggestions:

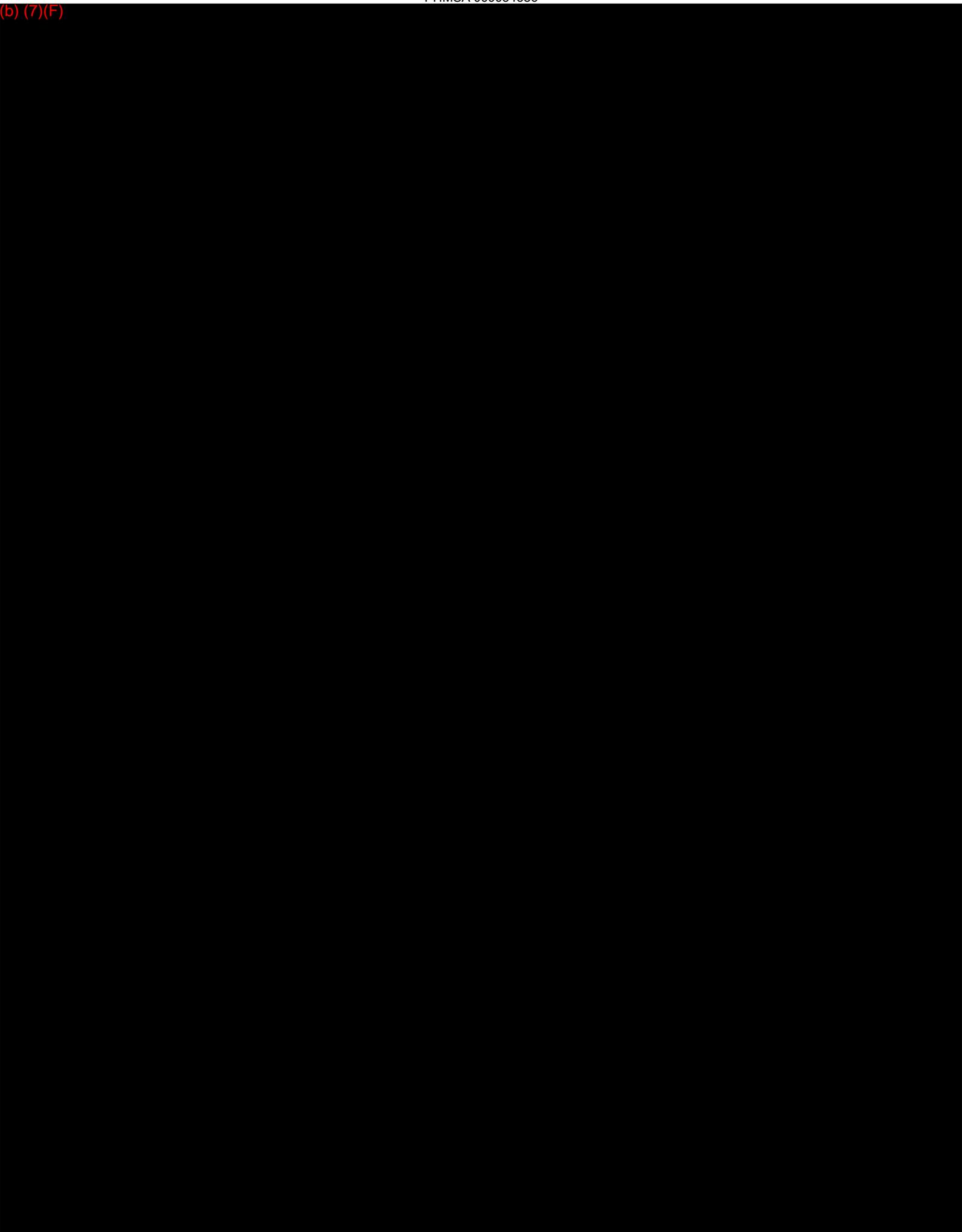
- Successful implementation of Action Points #1 through #4 (upstream of the outfall on the Cooper Creek Reservoir) would significantly lower the complexity of a response operation associated with this terminal. Impacts beyond that point have significant residential area components to address.
- Understanding of how to close the outfall at the reservoir would aid in facilitating the first observation.
- Natural containment afforded by the reservoir works in the favor of responders attempting to contain a spill from the terminal.
- Traffic control will be required at many of the Action Point locations, and right-of-way to access response sites on private property should be examined in advance of the need for a response operation.
- Low-flash products – public evacuations possible.
- For any questions relating to this report contact Bill Hazel, Marine Pollution Control (Detroit, MI) - Office: 313-849-2681.

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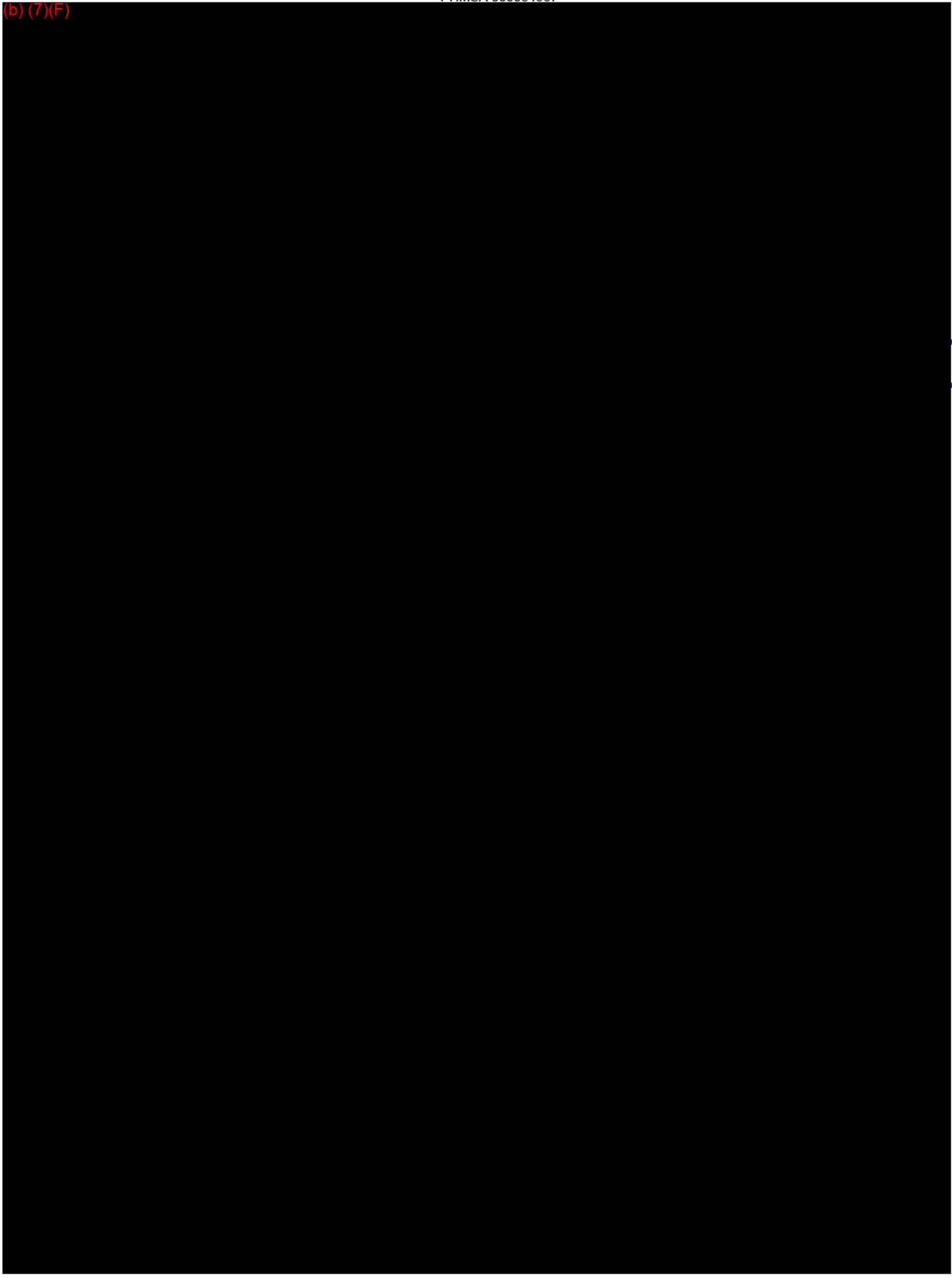
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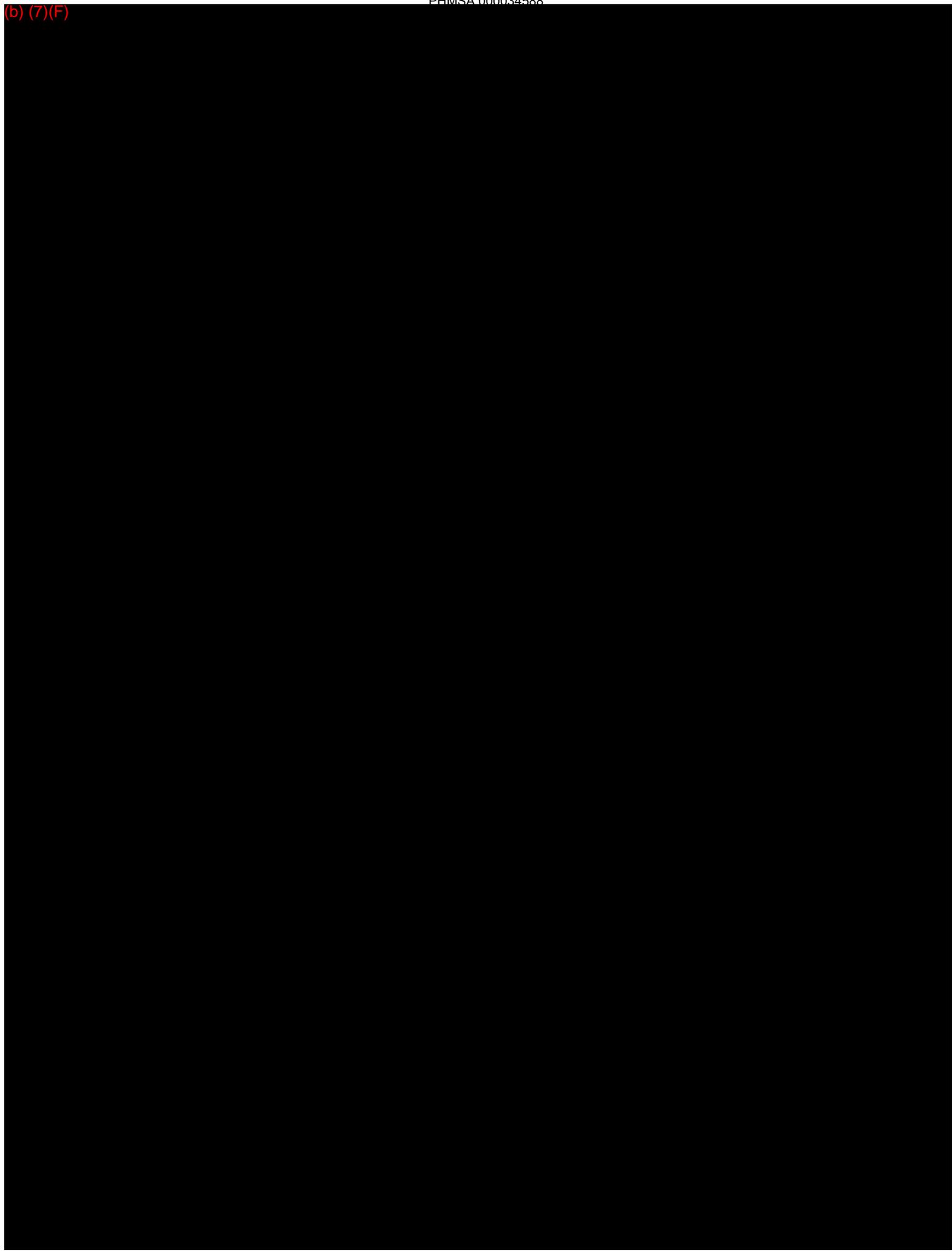
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Marine Pollution Control
8631 West Jefferson
Detroit, MI 48209 USA
313.849.2333 – 24/hour
marinepollutioncontrol.com

Marathon Petroleum Company LP – Columbus, GA LP Terminal
Figures 1 - 3



Figure 1 – The north fence line, taken from the northeast corner looking eastward. Note the pronounced slope eastward, leading to the small creek that flows southward toward Cooper Creek. Product will flow along the surface drainage ditch. Containment could be achieved using berms, underflow dams or (during high water events) using small booms.



Figure 2 – The point where the drainage ditch running eastward along the north fence line enters the small creek that flows south to Cooper Creek. During low water events it may be possible to install underflow dams on this creek, but most likely small containment booms would be used.



Figure 3 – The west fence line, looking southward. Product crossing this fence line would move westward to the small creek, then flow south to Cooper Creek. Berming and/or trenching could be used to prevent westward migration. If product reaches the creek small booms could be installed to prevent flow southward.

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Marine Pollution Control
8631 West Jefferson
Detroit, MI 48209 USA
313.849.2333 – 24/hour
marinepollutioncontrol.com

Marathon Petroleum Company LP – Columbus, GA LP Terminal
Figures 4 - 6



Figure 4 – The south fence line, looking eastward at an access gate along the perimeter. The area to the right (south) is dense woods leading to the creek that flows to/becomes Cooper Creek. Product will migrate southward through surface drainage pathways, and settle in low-lying areas.



Figure 5 – Dense woods to the south of the facility. Access through this area will require light footprint mechanized equipment such as Bobcats, small bulldozers and 4-wheel drive vehicles.



Figure 6 – The east fence line, looking northward. Product released over this perimeter will flow south near the fence line, then reach the south flow path to Cooper Creek. Trenching or berming should be used to perform containment.

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Terminal
Figures 7 - 9



Figure 7 – Action Point #1 – Cooper Creek as it passes below Milgren Road. Containment booms should be used on the creek, except during extreme low water conditions. Staging at this site is on the upstream (north) side. Provide stable footing for workers using shoreline shoring methods (i.e., ladders, etc.).



Figure 8 – Action Point #2 - Cooper Creek as it runs through Cooper Creek Park (along the Dick Collier Memorial Trail). This area provides ample room for response and for staging of equipment. Installing booms along the creek at this point would prevent product from impacting Cooper Creek Reservoir.



Figure 9 – Action Point #3 – The point where Cooper Creek enters into the reservoir (northeast corner). Containment booms should be used to close off the mouth of the creek and direct product to shore for recovery. It is suggested that 2,000 – 3,000 feet of boom is deployed at the park to facilitate operations at Action Points #2, #3 and #4.

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Figure 10 – Action Point #4 – The drainage outfall (catch basin) at the southwest corner of the reservoir. In the event of product reaching the reservoir this outfall should be protected by a containment boom, and municipal authorities should be contacted to close the outfall down (if possible). This would prevent migration southward along Cooper Creek.



Figure 11 – Action Point #4 - The discharge pipe from the outfall at the reservoir. Product passing beyond this point will enter into residential areas.



Figure 12 – Action Point #5 – Cooper Creek at Northwood Avenue. Small booms should be used to perform containment, and recovery operations can take place provided appropriate traffic control is maintained. Note the proximity of residences to the creek; in the case of low-flash materials significant evacuations are a potential.

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Figure 13 – Action Point #6 – Cooper Creek as it passes beneath Reese Road (access off of Guinevere Road just west of the creek). There is some room for response activities in this area but limited area for staging without traffic control.



Figure 14 – Action Point #7 – Cooper Creek as it passes beneath Conisburgh Way. Booms can be used for containment, and there is room for staging of other equipment provided traffic control is performed.

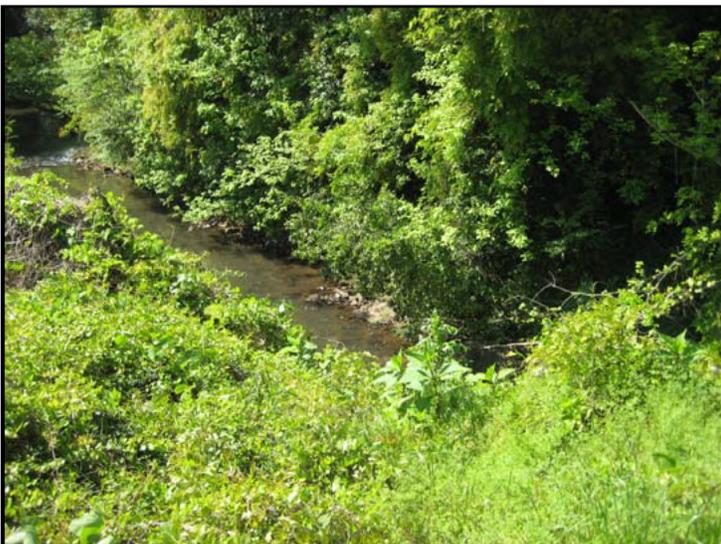


Figure 15 – Action Point #8 – Cooper Creek at Macon Road. Equipment staging should be located at the northeast axis of the cross formed by the creek passing under the roadway. Access to the creek becomes more difficult at this point and shoring to protect workers moving to the creek will be necessary.

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Figure 16 – Action Point #9 – Cooper Creek at Forest Road. Staging is available on the northwest axis (church parking lot).



Figure 17 – Action Point #10 – Bull Creek at St. Mary's Road (downstream of the convergence of Cooper's Creek). Bull Creek is a larger waterway than Cooper Creek, although response tactics are similar (i.e., the use of booms for containment operations). Note the access restrictions for watercraft operating on the creek (i.e., the municipal drainage pipe).

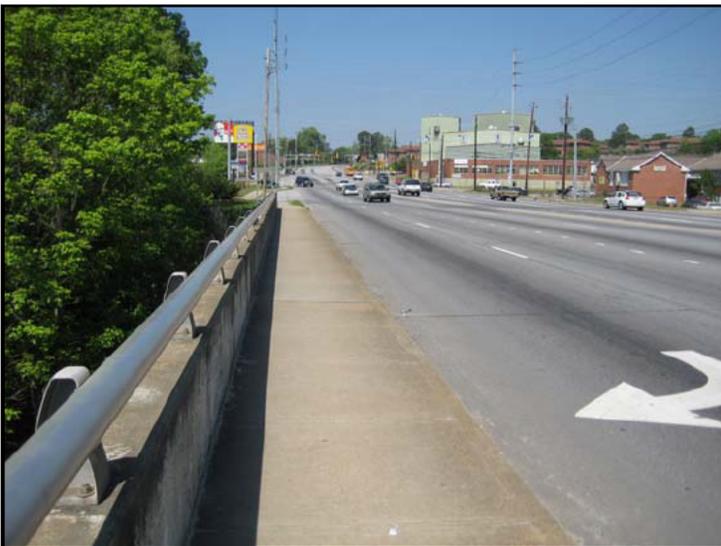


Figure 18 – Action Point #10 – Bull Creek at St. Mary's Road. Many access points for Bull Creek exhibit high bridges over the waterway (to allow for flood stage conditions), complicating access to the creek and posing a significant traffic control hazard.

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Figures 19 - 21



Figure 19 – Action Point #11 – Bull Creek at Cusetta Avenue. Access to the creek is difficult and traffic control requirement remains significant.

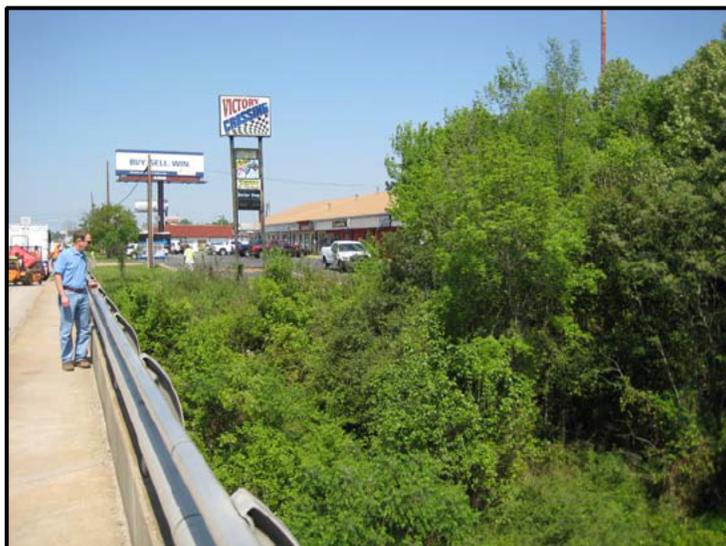


Figure 20 – Action Point #12 – Bull Creek at St. Highway #27. Again, creek access and traffic control will be a major component of responding at this site.

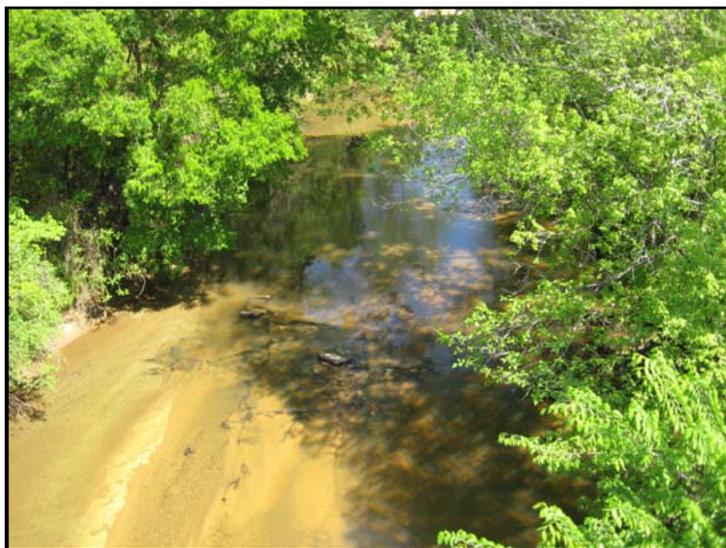


Figure 21 – Action Point #12 – Bull Creek at Highway 27.

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Figure 22 – Action Point #13 – Bull Creek just upstream of the Chattahoochee River (photo taken from the Riverwalk accessed at the end of 22nd Street at Highway 27). Access to the creek will be difficult and will require making a pathway through dense woods (except as noted below in Figure 24).



Figure 23 – Action Point #13 – The Riverwalk providing access to Bull Creek, This area could support some light machinery but would require right-of-way access and likely site restoration activities after an operation had concluded.



Figure 24 – Action Point #13 – The mouth of Bull Creek at the Chattahoochee River (end point of the survey). It would be possible to drive small watercraft upstream on the creek from this point, but responders are likely to encounter impassible obstacles a short distance up the way. The Chattahoochee flows southward from this point (i.e., towards the viewer in this picture).

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First Response Strategy Report – Columbus, GA LP Terminal
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Introduction Section

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RESPONSE PLAN COVER SHEET

General Information:

Owner/Operator of Facility: Marathon Petroleum CompanyFacility Name: Columbus, GA Light Products TerminalFacility Address: 5030 Miller Road
Columbus, GA 31908Facility Phone Number: 706/561-012124-Hour Contact Number: 1/877/MAPLINE (1-877-627-5463)

(b) (7)(F)

Dun & Bradstreet Number: 15-291-3448Date of Initial Operation: 1954

(b) (7)(F)

Number of Aboveground Oil Storage Tanks: thirteen (13)Number of Underground Storage Tanks: 0 Capacity (Gallons): N/ANumber of Storage Drums: 2 drums Capacity (Gallons): 11 gal.Number of Transformers Containing Oil: 1Total Transformer Volume (Gallons): 30 gals approx.Number of Surface Impoundments: 0 Capacity (Gallons): N/ANorth American Industry Classification System Code: 424710

(b) (7)(F)

Facility Distance to Navigable Water. Mark the appropriate line.

0 - ¼ mile X ¼ - ½ mile _____ ½ - 1 mile _____ > 1 mile _____

- The terminal is located adjacent to Cooper Creek.
- The “Applicability of Substantial Harm Criteria” with the signed Certification is located in the Introduction Section.

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INTRODUCTION

This Facility Response Plan (hereafter referred to as the “the Plan”) was designed by MPC in accordance with City and State Regulations and Section 4202 of the Oil Pollution Act of 1990. Reproduction of this Plan is prohibited without the express written permission of MPC. The Plan has been developed to minimize hazards to human health and the environment from spills, fires, explosions, or other emergencies.

PLAN CONTENTS

This MPC Columbus, GA Light Products Terminal Facility Response Plan describes organizational lines of responsibility and procedures to be followed when responding to oil spills involving MPC’s operations at this Terminal.

This document fulfills the requirements of the following regulatory plans:

- OPA 90 Facility Response Plan (This includes EPA Regulations in 40 CFR 112; and for marine terminals includes Coast Guard Regulations 33 CFR 154, Subpart F; and for terminals with attached MPC owned pipelines includes DOT/PHMSA/OPS Regulations in 49 CFR 194.
- **Spill Prevention, Control, and Countermeasure Plan (SPCC Plan)**
- Fire Prevention Plan
- Security Plan
- Evacuation/Employee Emergency Plan
- Emergency Response to Hazardous Substance Release Response Plan
- RCRA Contingency Plan
- Site Safety Plan

This Plan:

- Contains comprehensive technical and procedural information necessary for effective management of an emergency incident within the geographic location boundaries of the Plan.
- Defines procedures and systems in place to assist in preventing oil spills.
- Defines alert and notification procedures for contacting company management, government authorities, and the public.
- Identifies equipment, manpower, and other resources, which can be used during a response operation.
- Contains environmental data and spill response guidelines which can provide support for oil spill response planning and response operations.

Federal/State Approval Certification and Record of Changes

Insert a copy of Federal Agency submittals and approval documents in Section A when received. They may also be located at the Terminal, District Office and TT&R HES&S Office in Findlay.

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PLAN REFERENCES

This Terminal is regulated by the following regulatory agencies:

- EPA-Region 4
- DOT/PHMSA (For Pipeline Segment)

Terminal Complex Statement

- The terminal is a complex facility as described under OPA '90.

Reference documents used in preparing this Plan.

- OSROs Contracts and Equipment Lists
- MSDS Sheets for the Terminal's Products
- Columbus Light Products Terminal Spill Prevention Control and Countermeasure Plan
- National Contingency Plan (NCP)
- MPC TT&R Plan Review and Update Procedures

MPC has reviewed the NCP and appropriate ACPs and certifies that this Plan is consistent with the NCP and ACPs.

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MANAGEMENT APPROVAL OF SPCC PLAN

The Columbus, GA Light Products Terminal SPCC Plan is a carefully thought-out plan, prepared in accordance with good engineering practices, which has the full approval of management of Marathon Petroleum Company, (MPC) to commit the necessary resources to fully implement the plan.

The MPC Area Manager and the MPC Terminal Manager, who is the designated Qualified Individual in the Facility Response Plan, have each been given the full authority to commit whatever resources are necessary to fully implement this SPCC Plan.



Harold Rinehart
TT&R HES&S Manager

9-5-2012

Date

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DISCUSSION OF FACILITY'S CONFORMANCE WITH 40 CFR 112

MPC makes every effort to comply with the regulatory requirements in 40 CFR 112.

Specifically:

- 40 CFR 112.7(c) - All oil-filled operational equipment is located within secondary containment that will contain the discharge until cleanup occurs.
- 40 CFR 112.7(h)(1) – All truck and tank car loading / unloading racks have secondary containment sufficient to contain at least the capacity of the largest single compartment on the tank truck or tank car.
- 40 CFR 112.8(c)(2) – All bulk storage tanks are located within secondary containment sufficient to contain the shell capacity of the largest tank plus additional freeboard for precipitation. The secondary containment is sufficiently impervious to contain discharged oil.
- 40 CFR 112.7(g) – All oil handling, processing, and storing facilities are fully fenced with access controls in place. All master flow and drain valves from tanks are locked shut when in a non-operating status. Pump starter controls are located in a secure area and are turned off when not in an operating condition. All piping is capped or blank flanged when not in use. During darkness, all areas of the terminal are sufficiently lighted to prevent vandalism and allow discovery of discharges.
- 40 CFR 112.7(h)(2) – Load racks are equipped with an interlock system that prevents drivers from departing without properly disconnecting transfer hoses.
- 40 CFR 112.7(h)(3) – Both before loading or offloading, and after loading or offloading, drivers are required to inspect and verify there are no leaks from bottom outlets and all connections.
- 40 CFR 112.7(i) – Measures have been put in place to inspect all field constructed above ground oil storage tanks after repair or failure.

Exceptions, if any, will be listed on the PE Certification later in this section.

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CERTIFICATION & REVIEW OF SPCC PLAN

In accordance with 40 CFR, Part 112, Marathon Petroleum Company (MPC) has prepared a Spill Prevention Control and Countermeasure (SPCC) Plan for the Columbus, GA Light Products Terminal. The SPCC Plan is contained within this document (Facility Response Plan). A cross reference is included in the Table of Contents Section.

Part 112.5: Amendment of SPCC Plans

- (a) Amend the SPCC Plan for your facility in accordance with the general requirements in Part 112.7, and with any specific section of this part applicable to your facility, when there is a change in the facility design, construction, operation, or maintenance that materially affects its potential for a discharge as described in Part 112.1 (b). Examples of changes that may require amendment of the Plan include, but are not limited to: commissioning or decommissioning containers; replacement, reconstruction, or movement of containers; reconstruction, replacement, or installation of piping systems; construction or demolition that might alter secondary containment structures; changes of product or service; or revision of standard operation or maintenance procedures at a facility. An amendment made under this section must be prepared within six months, and implemented as soon as possible, but not later than six months following preparation of the amendment.
- (b) Notwithstanding compliance with paragraph (a) of this section, complete a review and evaluation of the SPCC Plan at least once every five years from the date your facility becomes subject to this part; or if your facility was in operation on or before August 16, 2002, five years from the date your last review was required under this part. As a result of this review and evaluation, you must amend your SPCC Plan within six months of the review to include more effective prevention and control technology if such technology has been field-proven at the time of the review and will significantly reduce the likelihood of a discharge as described in Part 112.1 (b) from the facility. You must implement any amendment as soon as possible, but not later than six months following preparation of any amendment. You must document your completion of the review and evaluation, and must sign a statement as to whether you will amend the Plan, either at the beginning or the end of the Plan or in a log or appendix to the Plan. The following words will suffice, "I have completed review and evaluation of the SPCC Plan for (name of facility) on (date), and will (will not) amend the Plan as a result."
- (c) Have a Professional Engineer certify any technical amendment to your Plan in accordance with Part 112.3 (d).

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Professional Engineer's Certification of SPCC Plan

MARATHON PETROLEUM COMPANY LP

COLUMBUS, GEORGIA TERMINAL

SPILL PREVENTION CONTROL AND COUNTERMEASURE PLAN

PROFESSIONAL ENGINEER CERTIFICATION

I hereby certify that my agent, Doug Bonk, has examined the Columbus, GA, Light Products Terminal and I attest that: I am familiar with the provisions of 40 CFR 112; this Plan has been prepared with good engineering practice and applicable standards; the procedures for required inspections and tests have been established; and, the Plan is adequate for the facility.

Exceptions: 1. SOIL PERMEABILITY NOT KNOWN: Soil permeability tests have not been conducted for the secondary containment dike walls and dike floors. The exact permeability is not known. However, the dike walls and floors are reported to be sufficiently impervious so that any discharge from primary containment will not escape secondary containment before cleanup occurs. 2. SECONDARY CONTAINMENT NOT ADEQUATE: Containment area CA-1 has only a 2" freeboard for a rain event. The EPA-recommended freeboard for this location is 7". I recommend that secondary containment be improved to meet the EPA recommendation. 3. NOT ALL PIPING IN CONTAINMENT: Piping from the pipe line manifold to Tank 15-2 runs outside containment. I recommend that this be corrected and containment be provided.



Fred Halvorsen

Printed Name of Registered Professional Engineer

Fred Halvorsen
Signature of Registered Professional Engineer

Registration No: **PE.49151** State: **OHIO**

Date: **October 1, 2011**

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SPCC Certification History

Spill Prevention, Control, and Countermeasures Plan	
Columbus, GA Light Products	
Listed below is the adoptive date or initial certification, review dates, revision dates, and amendment or recertification dates of the SPCC Plan.	
Review Status	Status Date
Revised	April 1997
Revised	April 1998
Revised	July 2000
Revised & Certified	December 2002
Revised	April 2005
Revised & Certified	July 2006
Revised & Certified	October 2011

In the past, review and evaluation of the SPCC Plan for the Columbus, GA Light Products Terminal has been conducted on the above dates and has been amended as outlined in the Record of Change page as a result.

Current and future 5 Year Reviews will be found in the SPCC FIVE YEAR REVIEW DOCUMENTATION on the following pages.

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SPCC FIVE YEAR REVIEW DOCUMENTATION

This Plan will be reviewed and evaluated at least once every five years to determine if more effective prevention and control technology has been field-proven and will significantly reduce the likelihood of a spill to navigable waters from this facility. The following pages document the 5 year reviews for this facility.

I have completed a review and evaluation of the SPCC Plan for the Columbus, GA Light Products facility and

WILL WILL NOT

amend the plan as a result.

Signature of Reviewer 

Printed Name JULIUS BLANCO

Title HES PROFESSIONAL

Date 08-06-12

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APPLICABILITY OF SUBSTANTIAL HARM CRITERIA

Does the facility transfer oil over-water to or from vessels and does the facility have a total oil storage capacity greater than or equal to 42,000 gallons?

Yes No X

Does the facility have a total oil storage capacity greater than or equal to 1 million gallons and does the facility lack secondary containment that is sufficiently large to contain the capacity of the largest aboveground oil storage tank plus sufficient freeboard to allow for precipitation within any aboveground oil storage tank area?

Yes No X

Does the facility have a total oil storage capacity greater than or equal to 1 million gallons and is the facility located at a distance (as calculated using the appropriate formula in Appendix C or a comparable formula) such that a discharge from the facility could cause injury to fish and wildlife and sensitive environments?

Yes X No

Does the facility have a total oil storage capacity greater than or equal to 1 million gallons and is the facility located at a distance (as calculated using the appropriate formula in Appendix C or a comparable formula) such that a discharge from the facility would shut down a public drinking water intake?

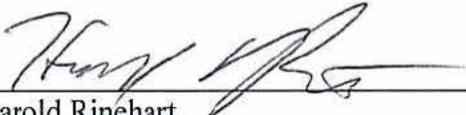
Yes No X

Does the facility have a total oil storage capacity greater than or equal to 1 million gallons and has the facility experienced a reportable oil spill in an amount greater than or equal to 10,000 gallons within the last 5 years?

Yes No X

CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this document, and that based on my inquiry of those individuals responsible for obtaining this information, I believe that the submitted information is true, accurate, and complete.



 Harold Rinehart
 TT&R HES&S Manager

9-5-2012

 Date

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PLAN DISTRIBUTION LIST**Columbus, GA Light Products Terminal**

Name	Address	Phone	Plan Reference #	No. of Copies
Federal				
Ted Walden FRP Coordinator	EPA-Region 4 Atlanta Federal Center 61 Forsyth Street SW Atlanta, GA 30303-8960	404/562-8752	EPA-FRP-04GA220	CD w/Action Plan
Melanie Barber Environmental Planning Officer	U.S. DOT Office of Pipeline Safety Room E22 210 1200 New Jersey Ave. S.E. Washington, DC 20590	Office: 202/366-4560 Cell: 202/384-4043	DOT/PHM SA	2 CDs
State/Local				
Fire Chief	Columbus, GA Fire Department 510 10th Street, P.O. Box 1340 Columbus, GA 31902	706/653-3500		CD
Chief of Police	Columbus Police Department 510 10th Street Columbus, GA 31902	706/653-3000		CD
Medical Director	Medical Center Hospital 710 Center Street Columbus, GA 31902	706/571-1000		CD
OSRO Contractor				
	SWS 16 Foundation Drive Savannah, GA 31402	912/966-0686		CD
Tony Wright	Kam, Inc. 2723 Manchester Rd. P.O. Box 4039 Columbus, GA 31904	706/324-5765		CD
Internal				
Chad Naiman Terminal Manager	Marathon Petroleum Company 5030 Miller Road Columbus, GA 31908	706/561-0121		1
Kevin Miller District Manager	Marathon Petroleum Company 539 South Main Street Findlay, OH 45840	419/421-3891		Database Distribution
Foster Clark Atlanta Area Manager	Marathon Petroleum Company 112 Town Park Drive, Suite 125 Kennesaw, GA 30144	770/427-3800 x601		Database Distribution
Steve Gerschutz Support Manager Macon, GA Terminal	Marathon Petroleum Company 2445 Allen Road Macon, GA 31216	478/788-2361		CD
Doug Bonk Environmental Professional	Marathon Petroleum Company 112 Town Park Drive, Suite 125 Kennesaw, GA 30144	770/427-3800 x605		Database Distribution
TT&R FRP Library	Marathon Petroleum Company 539 South Main Street Findlay, OH 45840			File Copy 2

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FACILITY INFORMATION / GEOGRAPHIC AREA

Facility Name: Marathon Petroleum Company
Columbus, GA Light Products Terminal

Facility Location: 5030 Miller Road
Columbus, GA 31908

Telephone: 706/561-0121

Fax: 706/561-6883

Facility County: Located in Muscogee County

(b) (7)(F)

River Mile: Not located on a river.

Wellhead Protection Area:

To the best of our knowledge, there is no groundwater protection plan for this area.

Owner/Operator: Marathon Petroleum Company
539 S. Main Street
Hancock County
Findlay, OH 45840
419/422-2121
MAPLINE Emergency Operator
1/877/MAPLINE (1-877-627-5463)

Terminal Manager/Qualified Individual/Person Accountable for Oil Spill Prevention:

Jason Perez
706/561-0121

QI Information (24-hour availability): See Section B (Also in ERAP).

QI Training: See Sections B & K

Date of Initial Operation: 1954

(b) (7)(F)

NAICS Code: 424710

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**DOT/PHMSA/OPS INFORMATION SUMMARY
For MPC Columbus, GA, Light Products Terminal**

Name and Address of Owner/Operator:

Marathon Petroleum Company LP
539 S. Main Street
Findlay, OH 45840
419/422-2121 / 1-800 MAPLINE (Emergency Operator)

Facility Location: 5030 Miller Road, Columbus, GA 31908

Qualified Individual (24 hour): See list of Qualified Individuals in Action Plan

DOT/PHMSA/OPS Pipelines: This terminal is a petroleum storage and distribution terminal which receives refined petroleum products by pipeline and tank truck, stores petroleum products in oil storage tanks, and discharges petroleum products by tank truck. The terminal itself is regulated by the EPA. DOT/PHMSA/OPS regulates the pipeline segment from the Plantation Pipeline (PPL) Station located approximately 1000' to the northeast of the terminal. This segment consists of a gate valve and check valve inside the PPL station and approximately 1,120' of a 8" diameter pipeline. The single pipeline segment flows to the pipeline receipt manifold on the terminal and delivers both gasoline and diesel oil. The terminal cannot pump back into the pipeline. See the Site Diagram in Section G for the schematic of the pipeline segment.

RSPA Operator's Statement of Basis for Determination of Harm: We have determined that the pipeline segments meet the requirements for a significant harm facility under 49 CFR 194.103. Specifically, the pipelines are less than 10 miles in length.

(b) (7)(F)



No oil storage tanks at the terminal serve as breakout tanks regulated by DOT/PHMSA/OPS.

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Terminal History, Reportable Spill History, Dates, and Types of Substantial Expansion & Current Operation

The Terminal engages in the receipt, storage, and distribution of petroleum products, additives, and other products used as motor fuels. (b) (7)(F)



(b) (7)(F)



Tank specific information is detailed on Form 300 and Secondary Containment information is detailed on Form 301 all in Section H. Section G has the tank and Secondary Containment information on a plot plan of the Terminal. Information concerning MSDS for each product is also listed in Section H.

This Terminal receives product via pipeline and transport and distributes via transport.

There have been no reportable spills at this facility.

In 2005, the name of the owner changed from Marathon Ashland Petroleum LLC to Marathon Petroleum Company LLC. In 2010, the name changed from Marathon Petroleum Company LLC to Marathon Petroleum Company LP.

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Facility Reportable Oil Spill History Documentation Instruction

As described in 40 CFR Part 110, reportable oil spills are those that: (a) violate applicable water quality standards, or (b) cause a film or sheen upon or discoloration of the surface of the water or adjoining shorelines or cause a sludge or emulsion to be deposited beneath the surface of the water or upon adjoining shorelines.

In the event a spill occurs, the following table should be used to gather the spill information, to the extent that such information is reasonably identifiable, to be reported in the FRP.

Discharge History Information Table		
Date of Discharge	Discharge Cause	
Material Discharged	Amount Discharged (gallons)	Amount Discharged to Navigable Waters (gallons)
Effectiveness and Capacity of Secondary Containment		
Clean-up Actions Taken		
Steps Taken to Reduce Possibility of Recurrence		
Total Oil Storage Capacity of the Tank or Impoundment from which the Material Discharged		
Enforcement Actions		
Effectiveness of Monitoring Equipment		
Description of How Spill Was Detected		

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FACILITY RESPONSE PLAN RECORD OF CHANGE

RR review = Latest Agency 5 year re-submittal date

Facility Name			Agency	Agency Plan No.	Next 5 year resubmission due
Columbus, GA Terminal			EPA	EPA-FRP-04GA220	2013
			Coast Guard		
			PHMSA	DOT/PHMSA	2013
Date Revised	Revision Number	Remove Section/Pages(s)	Insert Section/Page(s)	Brief Description	Prepared By
5/1999	7	Remove All Pages	Insert All Pages	The Manual has been completely updated. Please replace all pages.	Vickie Lawson-Stephens
2/2001	8	Remove All Pages	Insert All Pages	The Manual has been completely updated. Please replace all pages.	Vickie Lawson-Stephens
5/2002	9	Remove All Pages	Insert All Pages	The Manual has been completely updated. Please replace all pages.	Jack Ritchie
7/2003	10	Remove All Pages	Insert All Pages	The Manual has been completely updated. Please replace all pages.	Fred Halvorsen
10/2005	11	Remove Action Plan - Section W	Insert Action Plan - Section P	Removed unnecessary sections, Q-W	Fred Halvorsen/Tommy Davis/Kristi Miehl
11/2008	12	Remove Action Plan - Section P	Insert Action Plan - Section P	Regular Update, new TM	Chad Naiman/Kristi Miehl/Fred Halvorsen
7/2012	13	Remove Action Plan - Section P	Insert Action Plan - Section P	Scheduled Update, phone number updates and integrated SPCC Plan	Kristi Miehl/Fred Halvorsen

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ADDITIONAL SPCC DOCUMENTATION

The area behind this page should be used for storage of any of the following:

- Copies of individually certified Technical Amendments to the SPCC Plan,
- Any past PE Certification documents (where available),
- Recommendation letters, or
- Additional SPCC notes that do not otherwise have a specified location in the plan.

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PE Certification Recommendations (page 8):

Programs have been implemented to further review the recommendations regarding permeability and piping as discussed by the Professional Engineer on the Certification.

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MARATHON PETROLEUM COMPANY LLC

COLUMBUS, GEORGIA TERMINAL

SPILL PREVENTION CONTROL AND COUNTERMEASURE PLAN

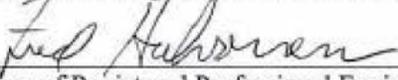
PROFESSIONAL ENGINEER CERTIFICATION

I hereby certify that my agent, DeAnne Redman, has examined the Columbus, GA, Light Products Terminal and I attest that: I am familiar with the provisions of 40 CFR 112; this Plan has been prepared with good engineering practice and applicable standards; the procedures for required inspections and tests have been established; and, the Plan is adequate for the facility.

Exception: Soil permeability tests have not been conducted for the secondary containment dike walls and dike floors. The exact permeability is not known. However, the dike walls and floors are considered sufficiently impervious so that any discharge from primary containment will not escape secondary containment before cleanup occurs.

Fred Halvorsen

Printed Name of Registered Professional Engineer


Signature of Registered Professional Engineer

Registration No: **E-49151**

State: **OHIO**



Date: **July 31, 2006**

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EPA – OPA 90
40 CFR 112 Appendix F

EPA OPA 90 - 40 CFR 112 Appendix F.	Brief Description	Location in Plan <u>See Table of Contents at Front of Each Section</u>
1.1	Emergency Response Action Plan	
	1. Qualified Individual Information	Emergency Response Action Plan (ERAP or Action Plan) -QI List & Contact Information, QI Training, QI Duties and Authority.
	2. Emergency Notification Phone List	Emergency Response Action Plan (ERAP or Action Plan) -Emergency Notification/Phone List
	3. Spill Response Notification Form	Emergency Response Action Plan (ERAP or Action Plan) -Form 100 - Incident Response Notification Form
	4. Response Equipment List and Location	Emergency Response Action Plan (ERAP or Action Plan) -Response Equipment List and Location
	5. Response Equipment Testing and Deployment	Emergency Response Action Plan (ERAP or Action Plan) -Response Equipment Testing and Deployment Log
	6. Facility Response Team	Emergency Response Action Plan (ERAP or Action Plan) -Terminal Response Team
	7. Evacuation Plan	Emergency Response Action Plan (ERAP or Action Plan) -Evacuation Plan
	8. Immediate Action	Emergency Response Action Plan (ERAP or Action Plan) -Emergency Events and Immediate Response Action -First Response Strategy Report (@ rear of ERAP)
	9. Facility Diagram	Emergency Response Action Plan (ERAP or Action Plan) -Site Diagram(s) -Site & Flow Diagram(s) -Terminal Office Building(s) Evacuation Diagram(s) -Site Evacuation, Site Fire & Site Security Diagrams
1.2	Facility Information	
1.2.1	Facility Name and Location	Introduction – Cover Page Introduction – Facility Information/Geographic Area
1.2.2	Latitude and Longitude	Introduction – Cover Page Introduction – Facility Information/Geographic Area
1.2.3	Wellhead Protection Area	Introduction – Facility Information/Geographic Area
1.2.4	Owner/Operator Information	Introduction – Cover Page Introduction – Facility Information/Geographic Area
1.2.5	Qualified Individual Information	Section B - QI List & Contact Information, QI Training, QI Duties and Authority. Section K - Training
1.2.6	Date of Oil Storage Start-Up	Introduction – Facility Information/Geographic Area
1.2.7	Current Operation	Introduction - Terminal History, Reportable Spill History, Dates, and Types of Substantial Expansion & Current Operation Section C – Daily Operations
1.2.7	NAICS Code	Introduction – Cover Page (NAICS Code) Introduction – Facility Information/Geographic Area
1.2.8	Dates and Type of Substantial Expansion	Introduction – Terminal History, Reportable Spill History, Dates, and Types of Substantial Expansion & Current Operation

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EPA – OPA 90
40 CFR 112 Appendix F

EPA OPA 90 - 40 CFR 112 Appendix F.	Brief Description	Location in Plan <u>See Table of Contents at Front of Each Section</u>
1.3	Emergency Response Information	
1.3.1	Notification	Section B – Emergency Notification Phone List -Form 100 - Incident Response Notification Form
1.3.2	Response Equipment List	Section F – Small (AMPD) Responder Audit Form/Equipment List, OSRO Certifications (USCG OSRO Classifications) Section L – Terminal Response Equipment List
1.3.3	Response Equipment Testing/Deployment	Section K – Terminal Drills/Exercises Section L – Response Equipment Testing & Deployment Section F – OSRO Certification (USCG OSRO Classification) & OSRO Deployment Letter.
1.3.4	Response Personnel	Section B – Terminal Response Team and District Response Team (Company Response Team) Section B – Emergency Response Information Section F – All (Including evidence of contracts) Section K – Training & Drills
1.3.5	Evacuation Plans	Section E – All
1.3.5.1	Facility-Wide Evacuation Plan	Same as 1.3.5
1.3.5.2	Resources to Assist in Evacuation Planning	Same as 1.3.5
1.3.5.3	Community Evacuation Plans	Same as 1.3.5
1.3.6	Qualified Individual's Duties	Section B – Qualified Individual Duties
1.4	Hazard Evaluation	
1.4.1	Hazard Identification	Section C – All Section H – All
1.4.2	Vulnerability Analysis	Section D – Vulnerability Analysis
1.4.3	Analysis of the Potential for an Oil Discharge	Section D – Analysis for the Potential for an Oil Spill Section H – Tank Ages
1.4.4	Facility Reportable Oil Spill History	Introduction – Terminal History, Reportable Spill History, Dates, and Types of Substantial Expansion & Current Operation Section D – Analysis for the Potential for an Oil Spill
1.5	Discharge Scenarios	
1.5.1	Small and Medium Discharges	Section D – EPA Regulated Discharges / Small Case Discharge / Medium Case Discharge Section F – Terminal OSROs and Response Times Introduction – Plan References
1.5.1.1	Facility Operations Contributing to Small and Medium Discharges	Section C – Daily Operations Section D – EPA Regulated Discharges / Small Case Discharge / Medium Case Discharge
1.5.1.2	Factors Affecting Response Efforts	Section D – EPA Regulated Discharges / Small Case Discharge / Medium Case Discharge
1.5.2	Worst Case Discharge	Section D – EPA Discharge Scenario / Worst Case Discharge Section F – Terminal OSROs and Response Times

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EPA – OPA 90
40 CFR 112 Appendix F

EPA OPA 90 - 40 CFR 112 Appendix F.	Brief Description	Location in Plan <u>See Table of Contents at Front of Each Section</u>
1.5.2.1	Calculation of the WCD Planning Volume	Section D – Planning Volume Calculations
1.5.2.2	Permanently Manifolder Oil Storage Tanks	Section D – Planning Volume Calculations
1.6	Discharge Detection Systems	
1.6.1	Discharge Detection by Personnel	Section C – Daily Operations Section J – Automated Detection Systems
1.6.2	Automated Discharge Detection	Section C – Daily Operations Section J – Automated Detection Systems
1.7	Plan Implementation	
1.7.1	Response Resources for Small, Medium, and WCD Spills	Section B – Plan Implementation/Response Resources for Small, Medium and Worst Case Discharges Section F – Terminal OSRO and Response Times
1.7.1.1	Implementation of Response Actions -Emergency plans for spill response -Additional response training -Additional contracted help -Access to additional response equipment/experts -Ability to implement the plan including response training and practice drills.	Section B – Emergency Plans for Spill Response Section F – Additional Response Training Section F – Additional Contracted Help Section F – Additional Support, USCG & Navy Resources, & Volunteers. Section B – Intra-Company Interaction, Coordination w/Federal /State / Local Response, Incident Response Team Approach Level I-III Section K – Ability to Implement the Plan Including Response Training And Practice Drills
1.7.1.2	Oil Spill Response Immediate Action	Section B – Description of Immediate Response Actions
1.7.2	Disposal Plans	Section M – Disposal Plans
1.7.2.1	Disposal Plan Description & Permits	Section M – Disposal Plans Section M – Transportation & Disposal Permits, Disposal / Transporters
1.7.2.2	Compliance with Federal, State & Local Regulations	Section M – Compliance with Federal, State & Local Regulations
1.7.3	Containment and Drainage Planning	Section C – Terminal Drainage/Secondary Containment and Containment and Recovery Section G – Site & Flow Diagram
1.8	Self-Inspection, Drills/Exercises, and Response Training	
1.8.1	Facility Self-Inspection	Section L – Terminal Self-Inspection, Form 600 and Form 601
1.8.1.1	Tank Inspection	Section L – Terminal Self-Inspection, Form 600 and Form 601
1.8.1.2	Response Equipment Inspection	Section L – Terminal Self-Inspection, Form 600 and Form 601
1.8.1.3	Secondary Containment Inspection	Section L – Terminal Self-Inspection, Form 600 and Form 601

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**EPA – OPA 90
40 CFR 112 Appendix F**

EPA OPA 90 - 40 CFR 112 Appendix F.	Brief Description	Location in Plan <u>See Table of Contents at Front of Each Section</u>
1.8.2	Facility Drills/Exercises (PREP)	Section K – All
1.8.2.1	QI Notification Drill Logs	Section K –Form 800, logs are maintained in the Terminal Office, online, and in Findlay OPA office
1.8.2.2	Spill Management Team Tabletop Exercise Logs	Section K –Form 800, logs are maintained in the Terminal Office, online, and in Findlay OPA office
1.8.3	Response Training	Section K
1.8.3.1	Personnel Response Training Logs	Section K – form logs are maintained in the Terminal and in Findlay employee database
1.8.3.2	Discharge Prevention Meeting Logs	Section K – form logs are maintained in the Terminal and in Findlay employee database
1.9	Diagrams	<u>See Cross Reference for Diagrams on page G-2.</u>
	Site Plan Diagram	Diagrams used are the Site Diagram; Site &Flow Diagram; Site Evacuation, Site Fire, &Site Security Diagram; USCG Dock and EPA/USCG Jurisdictional Diagram; Emergency Response Diagram; and others as referenced.
	Site Drainage Diagram	
	Site Evacuation Diagram	
1.10	Security	Section O
2.0	Response Plan Cover Sheet	Introduction – Response Plan Cover Sheet
2.1	General Information	Introduction – Facility Information/Geographic Area
2.2	Applicability of Substantial Harm Criteria	Introduction – Applicability of Substantial Harm Criteria
2.3	Certification	Introduction – Facility Response Plan Certification
3.0	Definitions, Acronyms, and References	Table of Contents

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DOT/ Pipeline and Hazardous Materials Safety Administration
Office of Pipeline Safety

DOT/PHMSA 49 CFR 194	Brief Description of Regulatory Requirement	Location in MPC Response Plan
194.107(a)	Resources for responding to a WCD or threat of a WCD	Action Plan, Section D, Section F, Section L
194.107(b)	Reviewed NCP and ACP and certify consistent with NCP and ACP	Section A
194.107(b)(1)(i)	Demonstrate understanding of Federal response structure and means to contact NRC and FOSC	Action Plan, Introduction
194.107(b)(1)(ii)	Provisions to ensure safety	Section P
194.107(b)(2)(i)	Address removal of WCD or threat of WCD	Section C, Section D
194.107(b)(2)(ii)	Identify sensitive areas	Section D
194.107(b)(2)(iii)	Describe responsibilities of operator in removing discharge or mitigating threat of discharge	Section A, Section B
194.107(c)(1)(i)	DOT/PHMSA/OPS Information Summary	Introduction
194.107(c)(1)(ii)	Immediate notification procedures	Action Plan
194.107(c)(1)(iii)	Spill detection and mitigation procedures	Section C, Section D, Section J
194.107(c)(1)(iv)	OSRO information	Section F
194.107(c)(1)(v)	Response activities and response resources	Action Plan, Section B, Section F, Section L
194.107(c)(1)(vi)	Contact information for agencies	Action Plan
194.107(c)(1)(vii)	Training procedures	Section K
194.107(c)(1)(viii)	Equipment testing	Action Plan, Section L
194.107(c)(1)(ix)	Drill program	Section K
194.107(c)(1)(i)	Plan review and update procedures	Section A
194.107(c)(3)	Description of response management system	Section B

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OSHA Emergency Action Plan
29 CFR 1910.38

OSHA Emergency Action Plan – 29 CFR 1910.38	Brief Description	Location in Plan
(c) (1)	Procedures for reporting a fire or other emergency	Section E / Action Plan
(c) (2)	Procedures for emergency evacuation, types of evacuation, and exit route assignments	Section E
(c) (3)	Procedures to be followed by employees who remain to operate critical plant operations before they evacuate	Section E
(c) (4)	Procedures to account for all employees after evacuation	Section E
(c) (5)	Procedures to be followed by employees performing rescue or medical duties	Section E
(c) (6)	Name and job title of every employee who may be contacted for further information	Section E
(d)	Employee alarm system. An employer must have and maintain an employee alarm system. The employee alarm system must use a distinctive signal for each purpose and comply with the requirements in § 1910.165.	Sections E & G
(e)	Training. An employer must designate and train employees to assist in a safe and orderly evacuation of other employees.	Section K
(f)	Review of emergency action plan. An employer must review the emergency action plan with each employee covered by the plan:	Section E

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Fire Prevention Plan
29 CFR 1910.39 Elements

Fire Prevention Plan Elements – 29 CFR 1910.39	Brief Description	Location in Plan
(c) (1)	A list of all major fire hazards, proper handling and storage procedures for hazardous materials, potential ignition sources and their control, and the type of fire protection equipment necessary to control each major hazard	Section I
(c) (2)	Procedures to control accumulations of flammable and combustible waste materials	Section I
(c) (3)	Procedures for regular maintenance of safeguards installed on heat-producing equipment to prevent the accidental ignition of combustible materials	Section I
(c) (4)	The name or job title of employees responsible for maintaining equipment to prevent or control sources of ignition or fires	Section I
(c) (5)	The name or job title of employees responsible for the control of fuel source hazards.	Section I
(d)	Employee information. An employer must inform employees upon initial assignment to a job of the fire hazards to which they are exposed. An employer must also review with each employee those parts of the fire prevention plan necessary for self-protection.	Section K

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**Hazardous Waste Operations and Emergency Response
29 CFR 1910.120 (q) 2**

Hazardous Waste Operations and Emergency Response – 29 CFR 1910.120 (q) 2	Brief Description	Location in Plan
2. Elements of an Emergency Response Plan		
	i. Pre-Emergency Planning and Coordination with Outside Parties	Terminal
	ii. Personnel Roles, Lines of Authority, Training and Communication	Introduction; Sections B, K & N
	iii. Emergency Recognition and Prevention	Action Plan
	iv. Safe Distances and Places of Refuge	Sections E & O
	v. Site Security and Control	Section O
	vi. Evacuation Routes and Procedures	Action Plan; Section E
	vii. Decontamination	Section P
	viii. Emergency Medical Treatment and First Aid	Section P
	ix. Emergency Notification and Response Procedures	Section E
	x. Critique of Response and Follow-up	Section K, Form 800
	xi. PPE and Emergency Equipment	Action Plan; Section L
	xii. Emergency Response Organizations	Action Plan; Section B

Note: Hazardous Waste Sampling and Disposal Information is located in Section M.

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RCRA Contingency Plan
40 CFR 262-272 RCRA Hazardous Waste Regulations

RCRA Contingency Plan – 40 CFR 262-272 RCRA Hazardous Waste Regulations	Brief Description	Location in Plan
General Facility Standards		
265.16	Personnel Training	Section K
Subpart C Preparedness and Prevention		
265.31	Maintenance and Operation of the Facility	Sections C & L
265.32	Required Equipment	Action Plan; Sections F, L, N, & G
265.33	Testing and Maintenance of Equipment	Section L
265.34	Access to Communications or Alarm Systems	Section N
265.36	Arrangements with Local Authorities	Introduction
Subpart D Contingency Plan and Emergency Procedures		
265.51	Purpose and Implementation of Contingency Plan	Facility Response Plan
265.52	Contents of Contingency Plan	Action Plan; Sections B, D, E, F, G & L
265.53	Copies of Contingency Plan	Introduction
265.54	Amendment of Contingency Plan	Section A
265.55	Emergency Coordinator	Action Plan; Section B
265.56	Emergency Procedures	Action Plan; Section D

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**EPA SPCC PLAN
40 CFR 112**

**“Location in MPC Integrated Plan” is the Section Name or Letter followed by:
Headings and Sub-Headings.**

Heading/Sub-Heading Pg numbers are listed in the Section’s Table of Contents.

EPA SPCC PLAN – 40 CFR 112	Requirement from 40 CFR 112	Location in MPC Integrated Plan
112.3(d)	Professional Engineer’s certification and certification history	<u>INTRO Section</u> <ul style="list-style-type: none"> • “Professional Engineer’s Certification of SPCC Plan” • “SPCC Certification History”
112.5(a)-(c)	SPCC Plan amendment procedures	<u>INTRO Section</u> <ul style="list-style-type: none"> • “Certification and Review of SPCC Plan”
112.5 & 112.7	Management approval and review	<u>INTRO Section</u> <ul style="list-style-type: none"> • “Management Approval & Review of SPCC Plan”
112.7(a)(1) and (2)	Discussion of the facility’s conformance with Part 112	<u>INTRO Section</u> <ul style="list-style-type: none"> • “Discussion of Facility’s Conformance with 40 CFR 112”
112.7(a)(3)	Physical layout and facility diagrams	<u>INTRO Section</u> <ul style="list-style-type: none"> • “Facility Information / Geographic Area” <u>Section G</u> <ul style="list-style-type: none"> • “Site Diagram” • “Core Piping Plot Plan”
112.7(a)(3)(i)	Type of oil and container capacities	<u>Section G</u> <ul style="list-style-type: none"> • “Site Diagram” <u>Section H</u> <ul style="list-style-type: none"> • “Storage Tank Identification & Secondary Containment / Diked Areas”
112.7(a)(3)(ii);	Discharge prevention measures & Routine Handling.	<u>Section C</u> <ul style="list-style-type: none"> • “Daily Operations” <u>Section D</u> <ul style="list-style-type: none"> • “EPA regulated Discharges”
112.7(a)(3)(iii)	Drainage controls and secondary containment	<u>Section C</u> <ul style="list-style-type: none"> • “Facility Drainage / Secondary Containment” <u>Action Plan</u> <ul style="list-style-type: none"> • “First Response Strategy Report” or “Tactical Response Plan” (report name varies w/facility)
112.7(a)(3)(iv)	Emergency response and discharge countermeasures	<u>Action Plan</u> <ul style="list-style-type: none"> • “First Response Strategy Report” or “Tactical Response Plan” (report name varies w/facility) <u>Section B</u> <ul style="list-style-type: none"> • “Plan Implementation” <u>Section C</u> <ul style="list-style-type: none"> • “Containment & Recovery” <u>Section D</u> <ul style="list-style-type: none"> • (All) – “Incident Strategies / Oil Spill Response Planning”

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40 CFR 112**

**“Location in MPC Integrated Plan” is the Section Name or Letter followed by:
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Heading/Sub-Heading Pg numbers are listed in the Section’s Table of Contents.

EPA SPCC PLAN – 40 CFR 112	Requirement from 40 CFR 112	Location in MPC Integrated Plan
112.7(a)(3)(v)	Disposal methods	<u>Section M</u> <ul style="list-style-type: none"> • (All) – “Sampling and Disposal Information”
112.7(a)(3)(vi)	Contact list and phone numbers	<u>Action Plan Section and Section B</u> <ul style="list-style-type: none"> • “Emergency Notification / Phone List”
112.7(a)(4)	Spill notification form	<u>Action Plan Section and Section B</u> <ul style="list-style-type: none"> • “Form 100 – Incident Response Notification Form”
112.7(a)(5)	Arrangement of information (not required if the facility has submitted an FRP)	n/a - FRP submitted under 112.20
112.7(b)	Prediction of potential discharge from equipment failure	<u>Section D</u> <ul style="list-style-type: none"> • “EPA Regulated Discharges” <ul style="list-style-type: none"> ○ “Potential for Other Equipment Failure, Type , & Control”
112.7(c)(1)	Dikes, berms or retaining walls sufficient to contain spilled oil	<u>Section C</u> <ul style="list-style-type: none"> • “Facility Drainage / Secondary Containment” • “Containment and Recovery” <u>Section G</u> <ul style="list-style-type: none"> • “Site and Flow Diagram”
112.7(d)(1)	Oil Spill Contingency Plan (not required if the facility has submitted an FRP)	n/a - FRP submitted under 112.20
112.7(d)(2)	Management written commitment to respond (not required if the facility has submitted an FRP)	n/a - FRP submitted under 112.20
112.7(e)	Inspections, tests and records	<u>Section L</u> <ul style="list-style-type: none"> • “SPCC Plan Inspection Records ”
112.7(f)(1)	Personnel training	<u>Section K</u> <ul style="list-style-type: none"> • (All) – “Training and Drills”
112.7(f)(2)	Designated person who is accountable for discharge prevention	<u>INTRO Section</u> <ul style="list-style-type: none"> • ”Facility Information / Geographic Area” <ul style="list-style-type: none"> ○ “Terminal Manager / Qualified Individual / Person Accountable for Oil Spill Prevention”
112.7(f)(3)	Schedule and conduct discharge prevention briefings	<u>Section K</u> <ul style="list-style-type: none"> • “Annual EPA/USCG Training Requirement”
112.7(g)	Security	<u>Section O</u> <ul style="list-style-type: none"> • “Section 4 – Security Measures”

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40 CFR 112**

**“Location in MPC Integrated Plan” is the Section Name or Letter followed by:
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Heading/Sub-Heading Pg numbers are listed in the Section’s Table of Contents.

EPA SPCC PLAN – 40 CFR 112	Requirement from 40 CFR 112	Location in MPC Integrated Plan
112.7(h)(1),(2),(3)	Facility tank car and tank truck loading/unloading rack	<u>Section C</u> <ul style="list-style-type: none"> • “Daily Operations” <ul style="list-style-type: none"> ○ “Loading/Unloading Facilities” • “Facility Drainage / Secondary Containment” <ul style="list-style-type: none"> ○ “Secondary Containment and Drainage for Loading Facilities”
112.7(i)	Brittle fracture evaluation	<u>Section L</u> <ul style="list-style-type: none"> • “Terminal Self Inspection” <ul style="list-style-type: none"> ○ “Tank Farm Inspections”(by type) <ul style="list-style-type: none"> ▪ “Brittle Fracture”
112.7(j)	Discussion of conformance with state rules	<u>INTRO Section</u> <ul style="list-style-type: none"> • “Introduction” • “Plan References”
112.7(k)	Oil Filled Operational Equipment	<u>Section D</u> <ul style="list-style-type: none"> • “EPA Regulated Discharges” <ul style="list-style-type: none"> ○ “Potential for Other Equipment Failure, Type , & Control”
112.8(b)(1),(2),(3),(4),(5)	Facility Drainage	<u>Section C</u> <ul style="list-style-type: none"> • “Facility Drainage / Secondary Containment” <u>Section G</u> <ul style="list-style-type: none"> • “Site and Flow Diagram”
112.8(c)(1) & (2)	Bulk Storage Containers – Material & Containment	<u>Section C</u> <ul style="list-style-type: none"> • “Daily Operations” <ul style="list-style-type: none"> ○ “Bulk Storage Tanks” • “Facility Drainage / Secondary Containment” <u>Section H</u> <ul style="list-style-type: none"> • “Storage Tank Identification & Secondary Containment / Diked Areas” – Table • “Hazard Evaluation / Identification”
112.8(c)(3)(i),(ii),(iii),(iv)	Bypass Valves	<u>Section C</u> <ul style="list-style-type: none"> • “Facility Drainage / Secondary Containment” <ul style="list-style-type: none"> ○ “General Facility Drainage”
112.8(c)(4),(5)	Bulk Storage Tanks – Buried or partially buried metallic tanks.	<u>Section C</u> <ul style="list-style-type: none"> • “Daily Operations” <ul style="list-style-type: none"> ○ Bulk Storage Tanks
112.8(c)(6)	Bulk Storage Tanks – Test & Inspect	<u>Section L</u> <ul style="list-style-type: none"> • “Terminal Self Inspection” • “SPCC Plan Inspection Records”
112.8(c)(7)	Bulk Storage Tanks – Internal Heating Coils	<u>Section C</u> <ul style="list-style-type: none"> • “Daily Operations” <ul style="list-style-type: none"> ○ “Bulk Storage Tanks”

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**EPA SPCC PLAN
40 CFR 112**

**“Location in MPC Integrated Plan” is the Section Name or Letter followed by:
Headings and Sub-Headings.**

Heading/Sub-Heading Pg numbers are listed in the Section’s Table of Contents.

EPA SPCC PLAN – 40 CFR 112	Requirement from 40 CFR 112	Location in MPC Integrated Plan
112.8(c)(8)	Bulk Storage Tanks – High level alarms, signals, devices	<u>Section C</u> <ul style="list-style-type: none"> ● “Daily Operations” <ul style="list-style-type: none"> ○ “Bulk Storage Tanks”
112.8(c)(9)	Bulk Storage Tanks – Observe Effluent Treatment Facilities	<u>Section C</u> <ul style="list-style-type: none"> ● “Facility Drainage / Secondary Containment” <ul style="list-style-type: none"> ○ “General Facility Drainage” <u>Section L</u> <ul style="list-style-type: none"> ● “SPCC Plan Inspection Records” – Terminal Inspections.
112.8(c)(10)	Prompt removal of discharges	<u>Section B</u> <ul style="list-style-type: none"> ● “Plan Implementation” <ul style="list-style-type: none"> ○ “Emergency Plans for Spill Response”
112.8(c)(11)	Mobile or Portable Oil Storage Containers	<u>Section C</u> <ul style="list-style-type: none"> ● “Daily Operations” <ul style="list-style-type: none"> ○ “Bulk Storage Tanks”
112.8(d)(1)	Facility Transfer Operations, Pumping and Facility Process – Buried Piping Protection	<u>Section C</u> <ul style="list-style-type: none"> ● “Daily Operations” <ul style="list-style-type: none"> ○ “In Plant Piping”
112.8(d)(2)	Facility Transfer Operations, Pumping and Facility Process – Out of Service Piping Controls	<u>Section C</u> <ul style="list-style-type: none"> ● “Daily Operations” <ul style="list-style-type: none"> ○ “In Plant Piping”
112.8(d)(3)	Facility Transfer Operations, Pumping and Facility Process – Pipe Supports	<u>Section C</u> <ul style="list-style-type: none"> ● “Daily Operations” <ul style="list-style-type: none"> ○ “In Plant Piping”
112.8(d)(4)	Facility Transfer Operations, Pumping and Facility Process – Inspection of Above Ground Valves Piping, Etc.	<u>Section C</u> <ul style="list-style-type: none"> ● “Daily Operations” <ul style="list-style-type: none"> ○ “In Plant Piping”
112.8(d)(5)	Facility Transfer Operations, Pumping and Facility Process – Warn All Vehicles Entering Facility	<u>Section C</u> <ul style="list-style-type: none"> ● “Daily Operations” <ul style="list-style-type: none"> ○ “In Plant Piping”

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Definitions, Acronyms, and References

ACP	Area Contingency Plans
ANPRM	Advanced Notice of Proposed Rulemaking
BBL	Barrels
CERT	Corporate Emergency Response Team
CHRIS	Chemical Hazards Response Information System
COTPs	Captains of the Port
CWA	Clean Water Act
DOT	Department of Transportation
EC	Emergency Coordinator
EDP	Emergency Planning Districts
EEZ	Exclusive Economic Zone
EMT	Emergency Management Team
EPA	Environmental Protection Agency
ES	Emergency Services
FEMA	Federal Emergency Management Agency
FFOS	First Federal on Scene
FOSC	Federal On-Scene Coordinator
FWPCA	Federal Water Pollution Control Act
GAL	Gallons
HAZMAT	Hazardous Materials
IC	Incident Commander
ICC	Incident Command Center
ICS	Incident Command System
LCP	Local Oil and Hazardous Substances Contingency Plan
LEPC	Local Emergency Planning Committees
MPC	Marathon Petroleum Company
MTR	Marine Transportation Related
NAICS	North American Industry Classification System
NAVIC(NVIC)	Navigation and Vessel Inspection Circular
NCP	National Oil and Hazardous Substances Pollution Contingency Plan
NPRM	Notice of Proposed Rulemaking
NRC	National Response Center
NRDA	Natural Resource Damage Assessment
NRS	National Response System
NRT	National Response Team
NSFCC	National Strike Force Coordinator Center
OPA	Oil Pollution Act
QI	Qualified Individual
RA	Regional Administrator
RCRA	Resource Conservation and Recovery Act
RRT	Regional Response Team
RSPA	Research and Special Programs Administration

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SARA	Superfund Amendments and Reauthorization Act
SDWA	Safe Drinking Water Act of 1986
SERC	State Emergency Response Commission
SI	Surface Impoundment
SONS	Spill of National Significance
SPCC	Spill Prevention, Control, and Countermeasures
TAPAA	Trans-Alaska Pipeline Authorization Act
USCG	United States Coast Guard
UTM	Universal Transverse Mercator coordinates

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Section A: Plan Revisions Procedures

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PLAN REVISIONS PROCEDURES

The Plan will be reviewed annually by the Terminal Manager and will be revised and updated as necessary to reflect any changes. This plan has been created in accordance with Marathon Petroleum Company standard number TTMHES110.

The Terminal Manager should periodically review the National Contingency Plan (NCP) and the Area Contingency Plan (ACP) as they change and make provisions for incorporation into the Plan.

All changes will be sent to the FRP Staff at the TT&R HES&S Findlay office for incorporation into the Plan.

The FRP Staff is responsible for the Plan maintenance and distribution. When the changes are received the FRP staff will hold the changes for the next scheduled update, revision, or re-submittal. At the scheduled time the FRP Staff will review and make all changes as necessary and will distribute the changes to the appropriate parties as outlined in the distribution list.

When distributions are received, the revisions should be immediately reviewed and inserted into the Plan and the obsolete pages discarded. This revision will be recorded on the Record of Change which will be included with most distributions.

PLAN REVISION UPDATE / RE-SUBMITTAL

The Plan is subject to update and revision for the following changes:

- Identification of a deficiency in the Plan
- Installation or significant changes in equipment or processes
- A change in Company Personnel (Terminal, District, or Response Team)
- A change in telephone numbers
- A change in OSRO (that does not materially change support capabilities)
- Revisions determined to be necessary following review of an exercise or incident

The Plan is subject to re-submittal for the following changes:

- A change in the facility's configuration that materially alters the information in the Plan
- A change in the type of oil handled, stored or transferred that materially alters the required response resources
- A material change in capabilities of the OSRO's equipment and personnel that impacts their response time or capability
- A material change in the facility's spill and response equipment or procedures
- New pipeline construction or purchase
- Change in worst case discharge volume
- Change in NCP/ACP that has a significant impact on the appropriateness of response equipment or strategies

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EPA

The Plan will be revised and resubmitted to the EPA Regional Administrator within 60 days.

DOT/PHMSA

The plan will be revised and submitted to PHMSA within 30 days and resubmit the plan every 5 years from the date of the last submission.

PLAN DISTRIBUTION

A copy of this Plan is distributed to stakeholders (see INTRO for distribution) and company personnel who may provide assistance during an emergency at the Columbus, GA Light Products Terminal.

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PLAN APPROVAL LETTERS

(Following Pages)

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**EMERGENCY COORDINATOR / DESIGNATED PERSON IN CHARGE / INCIDENT
COMMANDER**

Name & Address	Title	Office Phone Number	Home Phone Number	24 hour / Cellular Number	Response Time
Jason Perez 8054 Garret Pines Dr. Midland, GA 31820	Terminal Manager	706/561-0121	N/A	C/954-495-1432	1 hour
Designated Alternate					
Brian Faniel 1544 Celia Drive Columbus, GA 31907	Terminal Operator	706/561-0121	N/A	C/706/615-9654	1/2 hour

When a spill or an emergency incident is discovered, it will be reported to the Emergency Coordinator/Designated Person in Charge/QI/Incident Commander who is the Terminal Manager. The Terminal Manager will take immediate action as required to mitigate the emergency and act as the QI. If the terminal manager is not available, the designated alternate will take immediate action as required to mitigate the emergency and make required notifications. If deemed necessary, the Area Manager and/or District Manager will be notified via MAPLINE (1-877-627-5463), calling directly, or paging, and in consultation with the Area Manager/District Manager, a determination will be made of the level of response required.

Via the 1/877/MAPLINE (1-877-627-5463), the emergency operator can connect all parties on a conference call.

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LIST OF QUALIFIED INDIVIDUALS

Qualified Individual					
Name & Address	Title	Office Phone Number	Home Phone Number	24 Hour/Cellular Number	Response Time
Jason Perez (b) (6) <u>Work Address</u> 5030 Miller Road Columbus, GA 31908	Terminal Manager	706/561-0121	N/A	C/954-495-1432	1 hour
Alternate Qualified Individual(s)					
Steve Gerschutz (b) (6) <u>Work Address</u> 2445 Allen Road Macon, GA 31216-6301	Terminal Support Manager	478/788-2361	(b) (6)	C/813/326-5668	2 hours

QUALIFIED INDIVIDUAL TRAINING

QIs have received OSHA 24-hour Incident Commander and/or 24-hour Hazardous Materials Technician Training; QI/IC training; participated in PREP Deployment and Spill Management Team Exercises; and received spill prevention and spill response training. Training records are maintained at the facility or office by the QI.

QUALIFIED INDIVIDUAL DUTIES & AUTHORITY

MPC has designated Qualified Individuals (QI) with responsibilities and full authorities to implement removal actions, and manage spill incidents of different volumes and magnitude. The QIs are required to have a minimum of 24 hours of HAZWOPER Training - OSHA - 29CFR 1910.126 and be familiar with the implementation of the Terminal Facility Response Plan. Qualified Individuals have authority to:

- Ensure the activation of internal alarms and hazard communication systems to notify all Terminal personnel, contract personnel, transport drivers, etc.
- Ensure the notification of all response personnel (police, fire, medical, etc.) as needed.
- Ensure the identification, character, exact source, amount, and extent of the release, as well as other items needed for notification.
- Ensure the notification of appropriate Federal, State, and local authorities, including the National Response Center, State Emergency Response Commission, and Local Emergency Planning Committee, via the Environmental Engineer or Environmental Professional.
- Ensure the assessment of the interaction of the spilled substance with water and/or other substances stored at the Terminal and ensure the communication of that

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- Ensure the assessment the possible hazards to human health and the environment due to the release. This assessment must consider both the direct and indirect effects of the release (*i.e.*, the effects of any toxic, irritating, or asphyxiating gases that may be generated, or the effects of any hazardous surface water runoff from water or chemical agents used to control fire and heat-induced explosion), via the Safety Specialist or Safety Professional and/or the Environmental Engineer or Environmental Professional.
- Ensure the assessment and prompt actions to contain and remove the substance released.
- Ensure the coordination of rescue and response actions as previously arranged with all response personnel.
- Use authority to immediately access company funding to initiate cleanup activities.
- Direct cleanup activities until relieved.
- Ensure implementation incident mitigation procedures.
- Ensure the notification of any of the Oil Spill Response Organizations (OSRO) or response contractor(s) listed in Section F in addition to any OSRO with which MPC has an Environmental Service Contract.
- Ensure notification of any Terminal Transport & Rail District Manager and Support Managers for additional support.
- Ensure a liaison relationship with the pre-designated FOOSC.
- Obligate funds requested to carry out response activities.
- All MPC QIs will comply with the requirements as set forth by Federal regulations, including:
 - Speaking fluent English
 - Located within the United States
 - Being available on a 24-hour basis
 - Being familiar with the implementation of the Facility Response Plan
 - Being trained in the responsibilities of the Qualified Individual within the Facility Response Plan

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EMERGENCY NOTIFICATION / PHONE LIST

CONTACT NAME	NUMBER
Terminal Manager/EC – Jason Perez Columbus, GA LP Terminal	O/706/561-0121 C/954-495-1432
Local Emergency Responders	
MAPLINE Emergency Operator	1/877/MAPLINE (1/877/627-5463)
Police/Fire/Ambulance	911
Fire Department-Columbus, GA	706/653-3000
Police Department-Columbus, GA	706/653-3000
Sheriff's Department-Muscogee County	706/653-4225
Medical Facilities (From Section P)	
Medical Service, Inc.-Ambulance	706/563-2121
Medical Center Hospital	706/571-1000
St. Francis Hospital	706/596-4000
Doctor's Hospital	706/494-4262
Federal & State Agencies	
National Response Center	800/424-8802 or 202/267-2675
EPA-Region 4 (24-hour Emergency)	404/562-8700
Civil Defense/Emergency Management	706/653-3267
Georgia State Patrol	706/845-4104
State Fire Marshall	770/981-9339
Columbus Public Safety Office of Emergency Management (LEPC)	706/653-3267
OSROs	
KAM, Inc. (24-hour #) (Columbus)(AMP)	706/324-5765 or 706/324-5766
SWS Environmental First Response (24-hour #)(Atlanta; Savannah-WCD; Panama City Beach)	800/852-8878
HEPACO, Inc. (24-hour #)	800/888-7689
U.S. Environmental (Meraux)	888/279-9930
Utilities	
Electric: Local Power Company	888/660-5890
Gas: Local Gas Company	800/556-5469
Water: Local Water Company	706/649-3400
Weather and Media	
Local Radio	706/323-8255
Local TV	706/324-6471

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EMERGENCY NOTIFICATION / PHONE LIST

CONTACT NAME	NUMBER
MPC/SSA/PIPELINE	
Primary Command Post - Primary Terminal Office	706/561-0121 or 706/561-0122
Secondary Command Post(s) - Florida Rock & Tank Line Office	706/563-5671
Global Procurement	Craig Kuhlman O/419-421-4508 C/419-619-0878 Kevin Geise O/419-421-3565 C/419-306-5812
Neighboring Facilities	
Kinder Morgan	706/561-0221
Omega Partners	706/561-0160
Response Support – Aviation (From Section F)	
Total Flight	706/324-2453
Advance International, Inc.	478/788-1200
Response Support – Portable Housing Source (From Section F)	
Action Portable Buildings	706/322-6607
Banner Buildings	706/568-0500
Response Support – Potable Water Source (From Section F)	
Buck Ice & Coal Company	706/322-5451
Georgia Mountain Water	800/277-9283
Response Support – Sanitary Facilities Source (From Section F)	
Phoenix Rental Center, Inc.	334/298-9900
Environmental Partners	706/323-3660
Response Support – Fuel Source (From Section F)	
Crown Central Petroleum Corporation	706/561-0016
Fletcher Oil Company, Inc.	706/327-3297
Disposal Firms (From Section M)	
Georgia Petroleum, Inc.	229/244-9110
Aaron Oil, Inc.	229/244-9110
Transporters (From Section M)	
Holland Oil Company, Inc.	912/244-9110
Aaron Oil Company, Inc.	251/479-1616
Florida Rock & Tank Lines	706/563-5671
Container Suppliers (From Section M)	
Waste Management of GA	404/361-1182
Sandman, Inc.	706/322-6776
Communication Equipment Suppliers (From Section N)	
Radio Shack	706/324-1791
Radio Wholesale Marketing	706/561-7000
Rental Service Corporation	706/327-7407

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EMERGENCY NOTIFICATION / PHONE LIST

CONTACT NAME	NUMBER
Security Contractors (From Section O)	
Securitas	706/323-9769
Fire Fighting Services & Equipment	
Local Fire Equipment Supplier	706/653-3008
Williams Fire & Hazard Control	281/999-0276 or 409/727-2347

INCIDENT RESPONSE NOTIFICATION FORM 100 INSTRUCTIONS

- Never include information **which has not been verified**
- **Never speculate** as to **the cause of an incident** or **make any acknowledgment of liability**
- **DOCUMENT THE FOLLOWING**
 - agency notified
 - time agency notified
 - person notified
 - content of message given
- **DO NOT DELAY reporting** due to incomplete information
- Provide as much information as possible

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Form 100 – Incident Response Notification Form, Page 1 of 4

Columbus, GA LP Terminal

40 CFR Part 112 Appendix F 1.3.1

09/00

Caller Information				
Date	Time	Reporter's Name	Position within Company	
Reporter's Facility (address)		Facility Owned by Company	Division of Company	
Responsible Party				
Phone Number	Fax Number	Calling for Responsible Party (Y or N)	Calling for Federal Reporting Obligations (Y or N)	
Incident Description				
Date of Incident		Time	Weather	
Reason for Discharge		Incident Latitude/Longitude	Incident River Mile Post	
Incident Address/Location		Nearest City/County/State	Distance from City (Miles & Direction)	
Material Discharged (Y or N) Confidential (Y or N)		Material in Water? (Y or N)	Name of Water Body	
Container (Drum/Tank/Line, etc.)		Storage Capacity (bbl. or gal.)	Facility Total Storage Capacity	
Chris Code (Material)	Total Discharge Amount (est.)	Unit bbl. or gal.	Material in water (est.)	Unit bbl. or gal.

Initial notifications should not be delayed pending the collection of all information.ENV/RELPP/60C
TTM FRP (Form 100)CUSTODIAN: OPA Coordinator
COPY: None

REVISED: 3/2005

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Form 100 – Incident Response Notification Form, Page 4 of 4

Columbus, GA LP Terminal

40 CFR Part 112 Appendix F 1.3.1

09/00

Agency Response	
Agency on Site:	Agency Representative:
Date Arrived:	Time Arrived:
Agency on Site:	Agency Representative:
Date Arrived:	Time Arrived:
Agency on Site:	Agency Representative:
Date Arrived:	Time Arrived:
Agency on Site:	Agency Representative:
Date Arrived:	Time Arrived:
Agency on Site:	Agency Representative:
Date Arrived:	Time Arrived:
Contractor Notifications	
Contractor: Name of Contact: Time Contacted:	Comments: Arrival Time:
Contractor: Name of Contact: Time Contacted:	Comments: Arrival Time:
Contractor: Name of Contact: Time Contacted:	Comments: Arrival Time:
Contractor: Name of Contact: Time Contacted:	Comments: Arrival Time:
Company Notifications	
Contact: Time:	Comments: Arrival Time:
Contact: Time:	Comments: Arrival Time:
Contact: Time:	Comments: Arrival Time:

Initial notifications should not be delayed pending the collection of all information.**Send completed form to an OPA Coordinator in Findlay.**ENV/RELPP/60C
TTM FRP (Form 100)CUSTODIAN: OPA Coordinator
COPY: None

REVISED: 3/2005

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TERMINAL RESPONSE TEAM

The following personnel are Terminal employees and District employees that comprise the Terminal Response Team which is considered the Core Level I Response Team.

Columbus Light Products Terminal Response Team						
Name	Title	Office Phone Number	Home Phone Number	24 hour/ Cellular Number	Response Time	Emergency Response Duties
Jason Perez	Terminal Manager	706/561-0121	N/A	C/954-495-1432	1 hour	IC/OP
Brian Faniel*	Terminal Operator	706/561-0121	N/A	C/706/615-9654	1/2 hour	IC/OP/Plan/Log
Angela Williams	Terminal Assistant	706/561-0121	N/A	C/706/589-3656	1 hour	OP/Plan/Log
Doug Bonk	Environmental Professional	770/427-3800 x605	N/A	C/404/313-5606	2 hours	Env/Lia
Wade Callaway	Safety Specialist	770/427-3800 x615	N/A	C/419-619-8688	2 hours	Safe

*Designated Alternate

MPC's emergency response management program has adopted the Incident Command System (ICS). The ICS is compatible with the USCG Incident Management Handbook (USCG COMDT PUB P3120.17) and National Interagency Incident Management Systems (NIIMS).

MPC provides training for personnel as required by OSHA 29CFR 1910.120 and 29 CFR 1910.1200 which is appropriate for their assigned roles and responsibilities in the event of an incident.

Emergency Response Duties

QI	Qualified Individual
IC	Incident Commander
OP	Operations Section
Plan	Planning Section
Log	Logistics Section
Fin	Finance Section
Adv	Advisor
PA	Public Affairs
Lia	Liaison
Safe	Safety
Leg	Legal

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DISTRICT RESPONSE TEAM (Company Response Team)

The following personnel are District employees and Corporate employees that comprise the District Response Team (Company Response Team). The District Response Team is considered the Core Level II Response Team.

Asphalt & Southern Light Products District - Atlanta Area Response Team (Company Response Team)						
Name	Title	Office Phone Number	Home Phone Number	24 hour/Cellular Number	Response Time	Emergency Response Duties
Kevin Miller	District Manager	419/421-3891	N/A	C/419/351-1529	12 hours	IC
Matthew Brown	District Engineer	419/421-3995	N/A	C/419/348-7573	12 hours	Plan
Foster Clark	Atlanta Area Manager	770/427-3800 x601	N/A	C/419/348-8881	2 hours	IC
Doug Bonk	Environmental Professional	770/427-3800 x605	N/A	C/404/313-5606	2 hours	Env/Lia
Wade Callaway	Safety Specialist	770/427-3800 x615	N/A	C/419-619-8688	2 hours	Safe
Jill Smith	Analyst	419/421-3755	N/A	C/567-208-1021	12 hours	Fin
Roseanne Colasante	HR Advisor	770/427-3800 X 603	N/A	C/404/313-5131	2 hours	PA
Steve Gerschutz Macon, GA Terminal	Terminal Support Manager	478/788-2361	N/A	C/813/326-5668	1 hour	QI/OP
David Mathews Powder Springs, GA Terminal	Terminal Support Manager	770/948-8550	N/A	C/404/597-1676	1 hour	OP
Craig Kuhlman	Global Procurement	419/421-4508	N/A	C/419/619-0878	12 hours	Log

MPC's emergency response management program has adopted the Incident Command System (ICS). The ICS is compatible with the USCG Incident Management Handbook (USCG COMDT PUB P3120.17) and National Interagency Incident Management Systems (NIIMS).

MPC provides training for personnel as required by OSHA 29CFR 1910.120 and 29 CFR 1910.1200 which is appropriate for their assigned roles and responsibilities in the event of an incident.

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Emergency Response Duties

QI	Qualified Individual
IC	Incident Commander
OP	Operations Section
Plan	Planning Section
Log	Logistics Section
Fin	Finance Section
Adv	Advisor
PA	Public Affairs
Lia	Liaison
Safe	Safety
Leg	Legal

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RESPONSE TEAM RESPONSIBILITIES

Activation of the Terminal Spill Response Team

- The Terminal Oil Spill Response Team is modular, depending on the size and scope of the incident. Response team positions will be filled by personnel from the Terminal on an as needed basis depending on the circumstances of the spill situation.
- The staffing level needed to cover all task assignments that might be required to respond to an incident will be determined based on the situation.

The Spill Observer/First Responder:

- Will notify an Operator or Supervisor
- Will notify Terminal Manager/Emergency Coordinator/Designated Person in Charge/Incident Commander/QI

The Terminal Manager may:

- Assume QI responsibility and assume Incident Commander responsibility
- Activate the Terminal Spill Response Team
- Activate spill response contractors, as needed
- Notify the Fire and/or Police Departments, as needed
- Notify the District Manager or Area Manager or his Alternate (other District Manager or Area Manager)

The District Manager, or Alternate:

- Will notify Terminal, Transport & Rail (TT&R) Manager
- Will notify the Level II Response Team, as needed
- May go to the site and assume duties of the Incident Commander duties depending on the size and magnitude of the incident
- May notify Legal
- May notify Marine Transportation
- May notify Rail Fleet
- May notify the CERT Team leader via 1/877/MAPLINE (1-877-627-5463)

The Environmental Engineer/Environmental Professional

- Will notify the appropriate regulatory agencies

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PLAN IMPLEMENTATION

This section is a guide for immediate response actions to be taken when an incident such as a spill, fire or explosion is first observed. Contracted response resources are detailed in Section F of the plan. An immediate action form is shown below and in Section J of the plan.

Response Resources for Small, Medium and Worst Case Discharges

Small Discharge

In the event of a small spill, the Level 1 Facility Response Team will use the available spill response equipment at the terminal as required. Note that there is only limited response equipment, only a small quantity of absorbent material. The contracted small spill OSRO, KAN, Inc., located nearby in Columbus (5 miles away), will be called and will respond with personnel and response equipment within one hour for planning purposes. The Marathon Level 2 Response Team will be available to assist by telephone, and can be called upon to travel to the terminal if required. If necessary additional contracted OSROs can be called upon to respond and assist with personnel and equipment. See section J for contracted OSROs.

Medium Discharge

In the event of a medium spill, the Facility Response Team will use the available spill response equipment at the terminal as required, although response equipment is limited. The contracted medium spill OSRO, SWS Environmental First Response (SWS) located in Atlanta will be called and will respond with personnel and equipment within three hours for planning purposes. In addition, the small spill OSRO will also be called and can respond with personnel and equipment within an hour for planning purposes. If additional equipment and personnel are needed, a second medium spill OSRO, HEPACO, in Tucker, GA, will also be called to respond. The Marathon Level 2 Response Team will be available to assist by telephone, and will also be called upon to travel to the terminal to assist in managing the spill. An Incident Command Center will likely be established and be manned by the Marathon Level 2 Response Team. See Section J for the full listing of contracted OSROs and contact information.

Worst Case Discharge

In the event of a WCD, SWS with offices in Atlanta, Savannah, and Panama City, FL will be called and would be expected to initially respond within about 3 hours for planning purposes. The local small spill OSRO will also likely be called. An Incident Command Center will be established at the terminal or a convenient nearby location and be manned by the Marathon CERT members for the duration of the spill cleanup. In addition, the WCD backup OSROs, U. S. Environmental can be called out if additional personnel or response equipment is necessary. A senior Marathon employee will be designated to serve as the Incident Commander for MPC.

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Description of Immediate Response Actions

In the event of an actual release, terminal personnel will immediately respond as outlined in Section B of the FRP.

In addition the following actions must be taken as outlined in Section 1.7.1.2A to Appendix F to 40 CFR 112, **as long as the actions can be done safely:**

Oil Spill Response Immediate Actions

1. Stop the product flow.....Act quickly to secure pumps, close valves, etc
2. Warn personnel.....Enforce safety and security measures.
3. Shut off ignition sources.....Motors, electrical circuits, open flames, etc.
4. Initiate containment.....Around the tank and/or in the water with oil boom.
5. Notify MAPLINE (1-877-627-5463) who will contact the MPC Environmental Professional (EP) who will contact the NRC at 1-800-424-8802. In addition, the EP may notify the FOSC and SOSC, as appropriate
6. Notify, as appropriate OSRO, local officials, and neighbors.

(This form may also be found in Section J of this plan).

Emergency Plans for Spill Response

Emergency Recognition

Anyone discovering an oil spill or other emergency must first determine their potential involvement in the event based on many factors including the following:

- Level of training for responding to an oil spill
- Size of the spill/event
- Location of spill/event
- Product involved
- Personal Protective Equipment (PPE) available
- Response equipment available
- Availability of back-up personnel

All employees are trained to recognize a spill event and to begin the notification procedures appropriate for the event.

Prompt Correction of Visible Discharges

Any visible discharge from any container, including seams, gaskets, piping, pump, valves, rivets and bolts will be promptly corrected.

Any oil accumulation in diked areas will be promptly removed.

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Initial Hazard Assessment

The first trained MPC employee will assume command of the incident until relieved by a more senior MPC employee and must begin assessing the hazard(s) of the spill or other emergency event. When assessing the hazards, the First Responder/Incident Commander (IC) must always evaluate the hazards based on the following priorities:

1. Personnel Protection
2. Environmental Protection
3. Property/Assets Protection

When performing the hazard assessment the First Responder/IC should consider the following hazard categories and specify appropriate controls based on the recognized hazards.

Chemical Hazards

The IC must undertake a chemical hazard assessment. This begins by determining the source of the leak/spill, the identity of the spilled product and the chemical and physical properties of the spilled product based on the current environmental conditions.

Primary concerns would include the following:

- Volatility – Determine the vapor pressure of the product and based on current environmental conditions determine the potential for flammable/toxic vapor conditions.
- Vapor Density – Determine the vapor density of the spilled product. This will aid in the initial air monitoring conducted at the site.
- Specific Gravity – If the spilled product has the potential to impact a waterway, determine the specific gravity of the product. This information will aid in the air monitoring of vapors from the product and the ability to confine/contain the product and determine clean-up methods.

After performing the initial chemical hazard assessment, the IC must verify the current and near term weather conditions to determine how the weather (temperature, rain, inversions, fog) will affect the site condition and the hazards posed by the spill product.

Physical Hazards

Next the IC must begin assessing the physical hazards present as a result of the site conditions or the unexpected tasks required for the containment, confinement and/or control of the spill event.

Common physical hazards include:

- Slips, trips and falls
- Struck by or between equipment
- Heavy lifting and back injuries

- Liquid transfers – bonding and grounding
- Excavations
- Water hazards

After the assessment of the physical hazards, the IC must specify control measures that will be implemented to eliminate or reduce the risk. All control measures must be communicated to the affected employees and contractors exposed to these hazards.

Environmental Hazards

Environmental hazards pose a great risk for emergency response workers in the form of heat stress and cold stress. The IC must evaluate the risk of heat stress and/or cold stress and implement controls to reduce the hazards. When performing the assessment the IC must recognize the heat stress risks associated with the increased level of PPE including the use of Flame Resistant (FR) clothing and the cold stress risk of work on or near water. Other environmental hazards that may be encountered include:

- Poisonous plants
- Wild animals
- Insects
- Lightning

Appropriate control measure must be implemented for any other recognized environmental hazards.

Establishing Personal Protective Equipment Levels

Based on the initial chemical, physical, and environmental hazards, the IC must establish minimum levels of PPE appropriate for the recognized hazards and the tasks that must be performed.

MPC TT&R will utilize the Hazardous Waste Operations and Emergency Response (HAZWOPER) level D or modified level D PPE for response to spills involving petroleum hydrocarbons. This will include the following:

- Standard work uniform
- FR coveralls, if applicable
- Safety glasses
- Steel toe boots
- Over boots
- Leather, cotton or chemical resistant gloves
- Hard hat (if appropriate based on task)
- Face shield (if appropriate based on task)
- Goggles (if appropriate based on task)

Field Hazard Assessment

After performing the initial hazard assessment the IC or Designated Alternate will perform a field assessment using a combination LEL/O₂ air monitoring instrument (H₂S monitoring also for asphalt facilities).

The field assessment will determine the flammability and toxicity hazards. This initial assessment will be used to determine the extent of the hazardous area (exclusion zone). The exclusion zone will be established using warning tape or other equally effective means and will be illustrated on a map prepared during the spill event.

Information from the initial hazard assessment and the field hazard assessment will be incorporated into the Site Safety and Health Plan (Section P). Information in the Site Safety and Health Plan will be communicated to all affected responders including MPC employees, contractors and local emergency response personnel.

Mitigation

After performing the hazard assessments, if it is safe to do so, attempt to stop the source of the discharge and shut down all ignition sources.

Transfer System Leak

If a manifold fails, shut down upstream pumps, close upstream valves.

If a hose fails, shut down upstream pumps, close upstream valves. Drain hose in catch basin, if feasible.

Tank Overflow

If a tank is leaking or overflowing, shut down upstream pump(s) and close the fill line valve. Transfer oil to an alternative tank, if feasible.

Tank Failure

If a tank fails (*i.e.*, collapse) and safety conditions permit, divert oil to an alternative tank and shut all valves associated with the tank. If this is not possible, shut the closest upstream valve. Close all tandem lines associated with the tank.

Piping Release

If the source of the release originates from a pipeline (low pressure), shut down pumps, close pipeline, block valves on both sides of the spill, and drain blocked section of line.

If the source of the release originates from a pipeline (high pressure), shut down pumps, close pipeline, block valves on both sides of spill, construct or obtain temporary containment, bleed pressure off of pipeline into containment.

Explosion or Fire

In response to an explosion or fire, evaluate personnel injuries. Once all personnel have been removed from danger, then:

- Terminate all transfers or receipts
- Shut down all associated equipment, valves, pumps

Where liquids and gases are involved attempt to:

For Liquids:

- Control or disperse vapor
- Cool heated structures
- Divert and control runoff

For Gases:

- Disperse vapors
- Isolate source of gas
- Protect exposures

Equipment Failure

For all equipment failures, upstream valves will be closed and appropriate lines or vessels will be drained or, if pressurized, will be bled down into containment structures.

Isolate the Area/Warn Other Personnel

Notification

Information gathered during the assessments may be documented on Form 100 – Incident Response Notification Form (located earlier in this section) to facilitate reporting efforts.

The First Responder/IC will then begin the notification process, see the Emergency Reporting Flow Chart.

Containment, Confinement and Control Methods

After initial mitigation actions are complete, and notifications have been made to the required agencies, MPC will continue spill containment, confinement and control methods.

Containment methods may include:

- Tightening fittings
- Closing valves, depressurizing the lines
- Plugging and or patching
- Cargo transfer/lightering
- Reorienting the container

Confinement techniques and apparatus for land and water may include:

- Diking
- Diversion
- Retaining
- Overflow dam
- Siphon dam
- Booms
- Filter fence
- Skimming
- Absorbents
- Dispersants
- Mechanical removal
- Biological media

Control methods may include:

- Absorption
- Vapor dispersion
- Vapor suppression
- Venting
- Flaring
- Adsorption
- Neutralization
- Solidification
- Burning
- Flaring
- Chemical reaction

Based on the assessment by the Terminal Manager, Emergency Coordinator, Designated Person in Charge or IC, additional clean-up personnel and equipment may be dispatched to the site and deployed to contain, confine and control the spill.

MPC will coordinate the spill recovery and clean-up activities and ensure that these operations are being done to the satisfaction of the various agencies involved.

Additional Response Training

See Section F of this plan for “Additional Response Training”.

Ability to Implement Plan, Including Response Training and Practice Drills

See Section K of this plan for “Ability to Implement Plan, Including Response Training and Practice Drills”.

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MPC's EMERGENCY RESPONSE ORGANIZATIONAL STRUCTURE

MPC recognizes the different regulations and the different terminology such as Emergency Coordinator, Designated Person in Charge, Incident Commander and Qualified Individual.

Due to staffing size at our Terminals, the Emergency Coordinator, the Designated Person in Charge, the Qualified Individual, and the Incident Commander are the same person and this person is the Terminal Manager or his Designated Alternate.

The Terminal Manager or Designated Alternate has the authority to contact any or all spill response contractors, emergency agencies and government agencies.

EMERGENCY COORDINATOR DUTIES

Incident Responsibilities

- Coordinating response in an emergency, the Emergency Coordinator shall be called to the Terminal by Terminal personnel in the event of an actual or threatened emergency.
- Making an assessment of the situation and its direct or indirect health effects and determining what actions to take.
- Reacting to an imminent or actual emergency situation by:
 - Activating facility alarms or communications systems where applicable, to notify Terminal personnel
 - Notifying emergency response agencies such as the paramedics, ambulance, fire and police departments
 - Notifying Response Contractor, if necessary
 - Identifying the character, exact source, amount, and the extent of emitted or discharged materials
 - Documenting the incident, via Form 100
 - Monitoring the response
 - Taking all reasonable measures necessary to ensure that fire, explosion, emission, or discharges do not occur, reoccur, or spread to other materials or structures at the Terminal
 - Immediately after an emergency, with assistance from the District Environmental Professional, and approval of Federal and State environmental agencies, provide for treating, storing, or disposing of residues, contaminated soil, etc., from an emission, discharge, fire, or explosion at the Terminal
 - Communicating with Media

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Post Incident Responsibilities

- Restoring the emergency response capabilities of the Terminal by replacing used supplies, damaged equipment, and any damaged hazard detectors.
- Restoring the site and/or the operating equipment. The site and/or the equipment may need to be decontaminated and may have suffered physical damage.
- Notifying the appropriate authorities when cleanup is completed and that operations are ready to resume.
- Submitting a written report on the incident to the state environmental agency within 15 days of any incident that results in an environmental release. The report must include the following:
 - Name, address, and telephone number of the individual filing the report
 - Name, address, and telephone number of the Terminal
 - Date, time, weather conditions and location of the incident
 - A brief description of the circumstances causing the incident
 - Description and estimated quantity by weight or volume of material or waste involved
 - Assessment of any contamination of land, water, or air that has occurred due to the incident
 - Description of actions the Terminal intends to take to prevent a similar occurrence in the future

Note: Copy the District Office and the TT&R HES&S Office in Findlay.

- Updating the Facility Response Plan as Terminal changes are made and forwarding those changes to the TT&R HES Office in Findlay. The OPA Coordinators at the Findlay Office make the changes and distribute those changes.
- Conducting monthly inspections of safety, emergency, and monitoring equipment.

The Emergency Coordinator is responsible for being thoroughly familiar with all aspects of this Plan, all operations and activities at this Terminal, the location and characteristics of materials of the Terminal, the location of records and the layout of the Terminal.

DESIGNATED PERSON IN CHARGE DUTIES

Person In Charge - The highest ranking MPC employee on site during an incident is deemed to be the “person in charge.”

This person or the Designated Alternate will assume responsibility for coordination of all emergency response activities. This employee will be thoroughly familiar with all aspects of this

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Plan, all operations and activities at the Terminal, the locations and characteristics of hazardous substances, the location of all records within the Terminal, and the Terminal layout. In addition, this person will have the authority to begin committing the resources needed to implement the provisions of this Plan.

Incident Responsibilities

- If possible in a safe manner, stop the spill and begin containment. Determine the cause of the spill, fire, or explosion. Monitor for other leaks, pressure build-up, valve or pipe releases, etc.
- Shut down power sources and stop Terminal operations as necessary.
- As soon as feasible, fill out Form 100. Initial notifications should not be delayed pending the collection of all information.
- Initiate all necessary incident phone calls.
- **Keep MPC management updated.**
- Continue initial containment and recovery steps.
- Mobilize response - contractors, additional MPC support, etc.
- Set up a command center.
- Begin determining objectives, priorities, and needed actions for the next 4, 12, and 24 hour periods.
- **Prepare initial media statement.**
- **Increasing the Spill Response.** In the event a spill exceeds the capability of the Terminal Spill Response Team:
 - The Terminal Manager will request additional assistance from his District Manager.
 - The District Manager may activate and mobilize the members of the entire MPC CERT Team.

INCIDENT COMMANDER DUTIES

The Incident Commander is in charge of emergency response operations. He is responsible for the overall management of operations, including the development of strategic objectives that provide overall guidance for the tactical strategies that will be developed to address the emergency situation. The Incident Commander approves the General Plan and Incident Action Plans and the ordering and release of resources, supervises the work of the command staff, and monitors and evaluates the performance of the Emergency Response Team. He also communicates with senior company management, government agencies, and the media, as necessary.

QUALIFIED INDIVIDUAL DUTIES

MPC has designated Qualified Individuals (QI) with responsibilities and full authorities to implement removal actions, and manage spill incidents of different volumes and magnitude. The QIs are required to have a minimum of 24 hours of HAZWOPER Training - OSHA - 29CFR 1910.126 and be familiar with the implementation of the Terminal Facility Response Plan. Qualified Individuals have authority to:

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- Ensure the activation of internal alarms and hazard communication systems to notify all Terminal personnel, contract personnel, transport drivers, etc.
- Ensure the notification of all response personnel (police, fire, medical, etc.) as needed.
- Ensure the identification, character, exact source, amount, and extent of the release, as well as other items needed for notification.
- Ensure the notification of appropriate Federal, State, and Local authorities, including the National Response Center, State Emergency Response Commission, and Local Emergency Planning Committee, via the Environmental Engineer or Environmental Professional.
- Ensure the assessment of the interaction of the spilled substance with water and/or other substances stored at the Terminal and ensure the communication of that information to the response personnel at the scene of that assessment.
- Ensure the assessment the possible hazards to human health and the environment due to the release. This assessment must consider both the direct and indirect effects of the release (*i.e.*, the effects of any toxic, irritating, or asphyxiating gases that may be generated, or the effects of any hazardous surface water runoffs from water or chemical agents used to control fire and heat-induced explosion), via the Safety Specialist or Safety Professional and/or the Environmental Engineer or Environmental Professional.
- Ensure the assessment and prompt actions to contain and remove the substance released.
- Ensure the coordination of rescue and response actions as previously arranged with all response personnel.
- Use authority to immediately access company funding to initiate cleanup activities.
- Direct cleanup activities until relieved.
- Ensure implementation incident mitigation procedures.
- Ensure the notification of any of the Oil Spill Response Organizations (OSRO) or response contractor(s) listed in Section F in addition to any OSRO with which MPC has an Environmental Service Contract.
- Ensure notification of any Terminal Transport & Rail District Manager and Support Managers for additional support.
- Ensure liaison relationship with the pre-designated FOSC.
- Obligate funds requested to carry out response activities.
- All MPC QIs will comply with their requirements as set forth by Federal regulations, including:
 - Speaking fluent English
 - Located within the United States
 - Being available on a 24-hour basis
 - Being familiar with the implementation of the Facility Response Plan
 - Being trained in the responsibilities of the Qualified Individual within the Facility Response Plan

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REGULATORY REPORTING

In the event of a release of oil or hazardous substance, the MPC Environmental Professional is charged with making the required telephone notifications and written reports to local, state, and federal regulatory agencies. As required by local, state, and federal regulations, in the event of a spill, MPC's Environmental Professional will notify as necessary the parties as listed on the Emergency Notification/Phone List in Section B. The MPC Environmental Professional must keep an accurate list of telephone notifications and written reporting in the event of a release. The Incident Response Notification Form 100, contains a list of basic information that must be gathered and reported concerning the spill.

Required Notifications and Reporting:

1. Telephone Notification to the National Response Center – The MPC Environmental Professional must ensure that spills into or upon navigable waters (in essence, any spill) of the United States are reported as soon as there is knowledge of the spill to the National Response Center (NRC). The reporting requirement is immediate, and should be by telephone to the NRC at 800-424-8802. Do not wait to call while gathering information for the Incident Response Notification Form, Form 100, regarding the spill. Follow up calls may be necessary to communicate all information. The MPC Environmental Professional is responsible for documenting the fact that the report to the NRC has been made, or the Environmental Professional shall personally make the report to the NRC.
2. Telephone Notification to Other Federal Agencies – The MPC Environmental Professional must also notify, as appropriate, the EPA Regional Administrator(s) for the EPA Region(s) affected by any release, the appropriate U. S. Coast Guard Marine Safety Office if in a designated COTP Zone, and DOT/PHMSA/OPS if the release is from a regulated facility. In some cases, the notification to the NRC fulfills this requirement. Any release must be reported as soon as possible, but after notifying the NRC.
3. Telephone Notification to State Agencies – Each state has immediate telephone reporting requirements in the event of a release of oil or a hazardous substance, including notifying the State Emergency Response Commission (SERC). MPC Environmental Professionals must make telephone notifications to state agencies in the event of a release. This FRP contains an Emergency Notification/Phone List in Section B which should be consulted. State notifications always include the SERC. Most states have internet web sites that outline the immediate reporting requirements. In addition, the SERC can provide guidance as to each state's immediate telephone reporting requirements. MPC's OPA Coordinator can assist in determining required state notification requirements.
4. Telephone Notification to Local Agencies – Local reporting requirements include notifying the Local Emergency Planning Committee, the local Fire Chief and/or the local Emergency Management Agency (EMA). The MPC Environmental Professional must make the required local notifications. This will always include the local Fire Chief and the LEPC.

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5. State Written Reporting – Many states also have written follow up reporting requirements following a spill. The MPC Environmental Professional must determine the reporting requirements for any state affected by a release of oil or hazardous substance and prepare and submit the required report in the required time frame. Most states have internet web sites that outline the immediate reporting requirements. MPC OPA Coordinators assist in determining which written reports are required.
6. MPC Written Report – The MPC Environmental Professional should send a completed Incident Response Notification Form, Form 100, to the MPC OPA Coordinator within five days of the incident.

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INCIDENT RESPONSE TEAM APPROACH LEVEL I – III

Responders to a spill will use a tiered approach by first utilizing resources and manpower available locally. The level of response can then be increased by bringing in resources from outlying areas as required by the size of the incident, the ability to control it, and the gravity of the situation. As subsequent tiers are activated, they absorb the lower tiers and assume responsibility for management of the response.

TIERED LEVEL OF RESPONSE

MPC follows the Incident Command System.

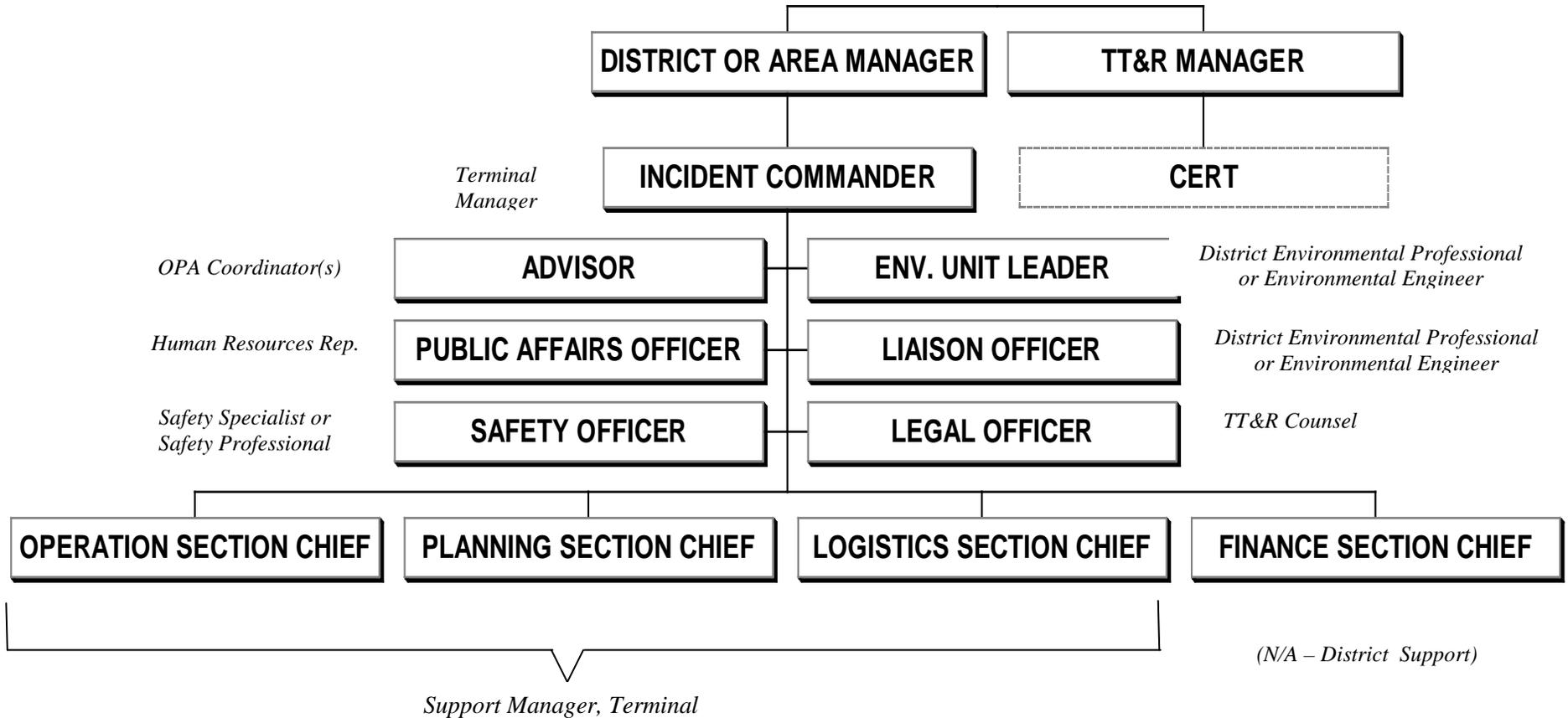
Level I - Those incidents that can be managed locally, with local personnel, equipment, and contractors. The Terminal Response Team is modular, depending on the size and scope of the incident, positions will be filled by personnel from the Terminal on an as needed basis depending on the circumstances of the spill situation.

Level II - Those incidents that require area resources for spill management, response, and support. The District Response Team will combine with the Terminal Response Team.

Level III - Those incidents that require resources from the entire organization for spill management, response, and support.

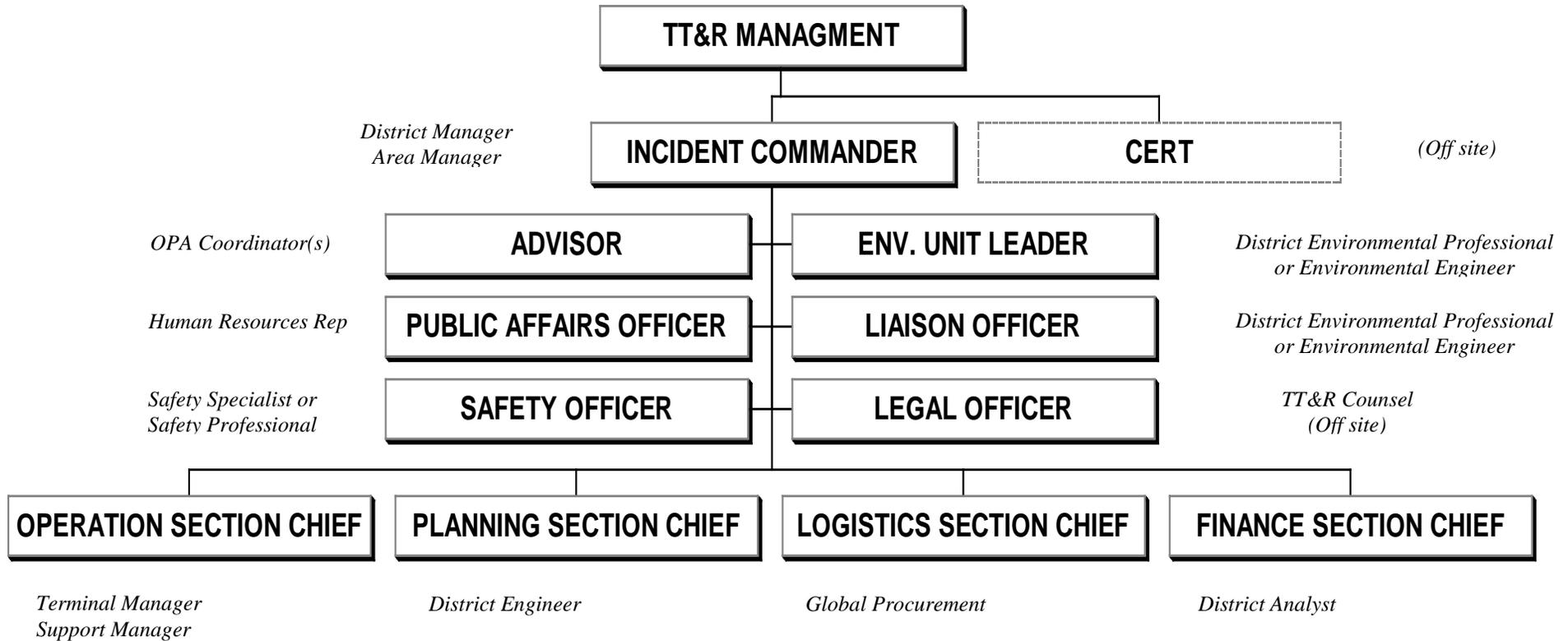
MPC's response organization is intended to be flexible and depending on the situation, all ICS units may not be staffed or several units may be handled by the same person depending on the situation.

TERMINAL, TRANSPORT & RAIL (TT&R) LEVEL I RESPONSE TEAM



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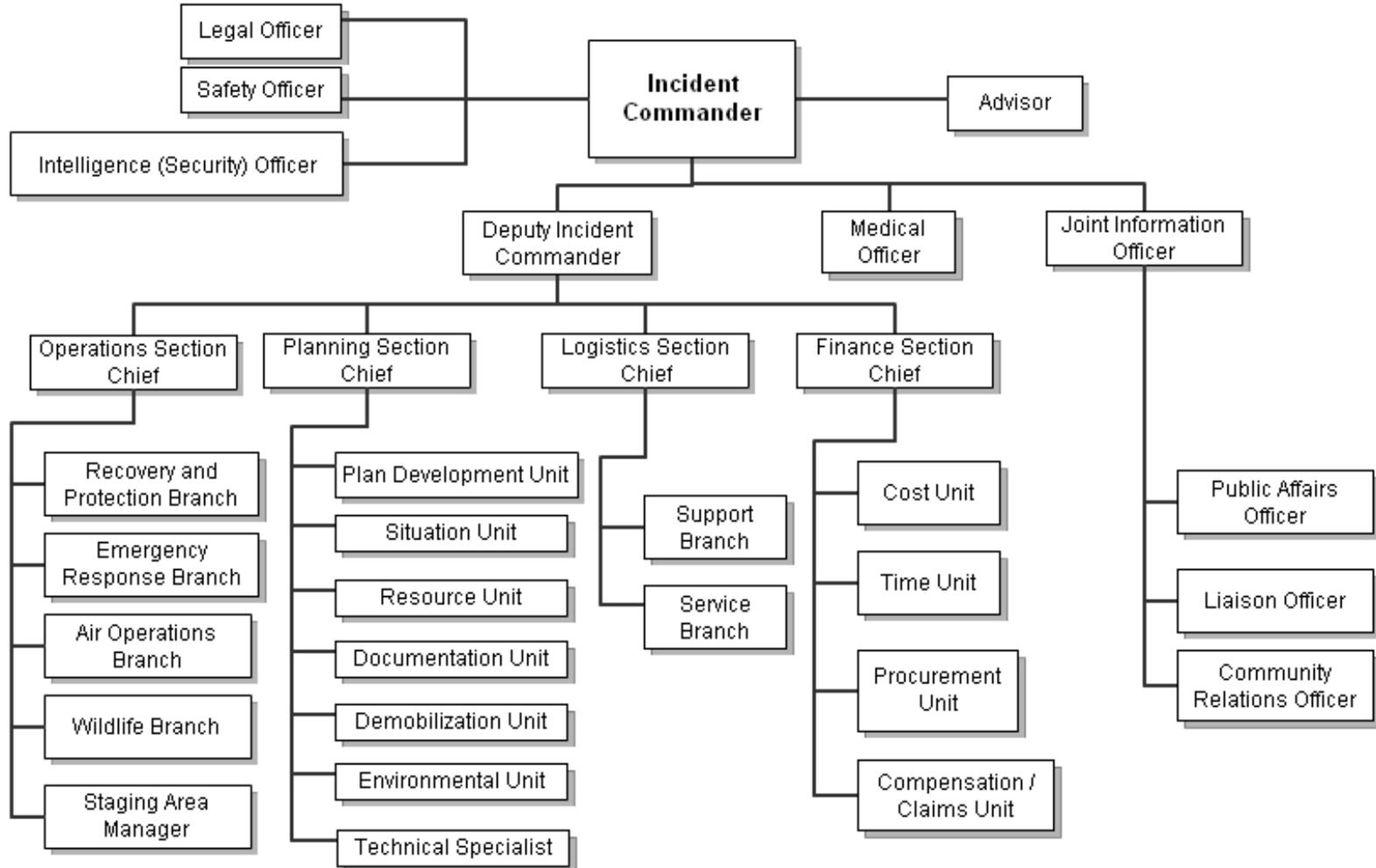
TERMINAL, TRANSPORT & RAIL (TT&R) LEVEL II RESPONSE TEAM



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CORPORATE EMERGENCY RESPONSE TEAM – (CERT) LEVEL III RESPONSE TEAM

DOMESTIC EMERGENCY STRIKE TEAM INCIDENT ORGANIZATION CHART (ICS 207)



Note: Not all positions listed above need to be filled and will be filled on an as needed basis.

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INTRA COMPANY INTERACTION

Listed below are several MPC Departments that TT&R may call for additional support in the event of an incident.

- 1) Marine Operations. This group could provide Operations support.
- 2) TT&R Rail Operations. This group could provide Operations support.
- 3) Marketing, Transportation & Engineering. MT&E could provide Operations support.
- 4) Refineries, Technical Services Group & Health, Safety and Environment. The different refineries could provide Operations, Safety and Environmental support.
- 5) Marathon Pipeline LLC. The pipeline group could provide Operations, and Environmental support.
- 6) Global Procurement. This group can provide Logistic support.
- 7) Law. In addition to Legal support, Legal also documents the incident.
- 8) Human Resources. HR supports Community Relations.
- 9) Environment and Safety. This group can provide Environmental, Safety, and Natural Resource Damage Assessment support.
- 10) Medical Services and Human Resources and the Environment. These two groups could provide Health Services and Environmental support.
- 11) Research and Development. This group can provide environmental sampling and analysis.
- 12) Financial Planning & Treasurer. This group can provide Finance and Treasury support.
- 13) Communications. This group can provide Public Affairs/Media support.

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COORDINATION WITH FEDERAL / STATE / LOCAL RESPONSE

MPC'S response organization will utilize an Incident Command System (ICS) to manage the response internally. Using this management system will ensure all MPC response personnel, spill response contractors and agency representatives are coordinating the response effort within a specified organizational structure.

In the event of a discharge or a substantial threat of a discharge that would involve the activation of the Federal On-Scene Coordinator (FOSC), this Plan is designed to be consistent with both the National Contingency Plan (NCP) and the Area Contingency Plan (ACP) which designates the coordination and responsibilities between the responsible party and the FOSC. MPC intends to remain in command of all response activities. A Unified Command Structure will be formed by MPC that will include MPC's Response Teams and representatives of federal, state and local agencies to manage the response activities.

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Section C: Daily Operations, Drainage Controls, Containment & Recovery

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DAILY OPERATIONS

The Columbus, GA Terminal is a full scale bulk Terminal with loading facilities for transport tank trucks. Products include all grades of gasoline, fuel oil, and additives. Products are received via pipeline and transport and distributed via transports.

(b) (7)(F)

Bulk Storage Tanks

The capacity, dimension, type of construction, and roof type for each tank is listed in Section H.

All product storage tanks are welded steel construction, are compatible with the products stored and conditions of storage, and comply with API or UL specifications.

The aboveground storage tanks and buried pipelines are cathodically protected.

If temporary mobile or portable oil storage tanks are ever used at this Terminal, such storage will be positioned or located so as to prevent spillage from reaching the surface streams, and a secondary means of containment will be provided. Such temporary or portable oil storage tanks will be sited in locations that are not subject to periodic flooding.

When a tank has been cleaned inside, and before being placed back in service, a visual inspection of the bottom will be made. If massive corrosion is evident, a system of non-destructive thickness testing will be initiated. A record of the tests will be attached to this plan with proper reference to the Terminal file where the full report is maintained.

A comprehensive external inspection of the tanks is made every ten (10) years in accordance with company standard procedures. This inspection includes ultrasonic thickness testing of shell plates, roof plates, and nozzles as well as checking foundation elevations. All tank inspection records are retained permanently.

In Plant Piping

Whenever sections of buried pipeline are exposed, they will be carefully examined and appropriate corrective action will be taken. Periodic pressure testing may be used on piping in areas where facility drainage is such that a failure may occur. Any inspections and/or pressure testing results will be recorded and kept in Terminal files.

If a section of line is exposed for any reason, it will be carefully examined for deterioration and corrosion. If damage is found, corrective repairs will be undertaken or the line will be replaced. If replaced, the new line will be coated and/or wrapped.

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Terminated pipe connections are capped or blank-flanged if the pipeline is not in service or on standby for extended periods. All open-ended lines that have product contained behind a closed valve shall be capped or flanged. The cap or flange shall be removed carefully and slowly, with a drip pan placed underneath to avoid spills in the event product seeps from the line. Lines taken out of service will be tagged to identify the origin of the line if known.

Pipe supports are designed to minimize abrasion and corrosion and allow for expansion and contraction. Pipe operating at ambient temperatures sit on I-beam type supports and are anchored at certain points to minimize movement and, therefore, reduce abrasion.

Aboveground valves and pipelines are visually observed during routine operations, by Terminal personnel, at which time a failure of items such as flange joints, expansion joints, valves, pipeline supports, and any metal surfaces shall be reported to the Terminal Manager, so that corrective action can be taken as necessary.

Almost all piping has been installed outside of areas subject to traffic; however, in some areas, the pipes and equipment are protected by bumper posts and concrete curbs.

Loading/Unloading Facilities

Tank truck loading/unloading occurs at the facility. This is a bottom loading/unloading truck facility. This facility does not have a rail tank car loading/unloading area.

Loading/unloading procedures meet the minimum requirements and regulations of the Department of Transportation.

The light oil loading racks have drains under the bays. The drains are directly connected to the 10,000-gallon oil/water separator.

The loading rack area has safety procedure signs displayed above each bay. Each sign is printed legibly and in full view of any arriving truck. In addition to the posted safety procedures, the Scully system is utilized in filling the trucks. This is a highly effective safety system in preventing spills and overfilling incidents.

Written procedures are posted at the light oil loading rack facilities. All Terminal personnel involved in loading operations are trained by MPC Terminal Manager or a designate prior to being allowed to operate loading rack equipment.

Prior to the loading and departure of any tank truck, all drains and outlets of any such vehicle/tank trailer shall be closely examined by the driver for leakage and, if necessary, tightened, adjusted, or repaired prior to departure to prevent liquid leakage while in transit.

Drivers must remain physically present during all loading operations.

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Pipeline Receipts

At least 12 hours prior to a receipt, the opening tank volume will be verified. The Plantation Pipeline Company pumping or control station is contacted to verify the batch size, product(s), the time and date of start up and projected shut down, the projected pumping rates, and other matters necessary to ensure an orderly and safe receipt operation. The Terminal verifies that the tank(s) can hold the volume to be received.

The Terminal is manned at the start of the receipt by assigned personnel. All tank and Terminal pipeline valves are kept closed prior to the beginning of the receipt. The normal receipt rate for gasoline is 1,400 bph and for fuel oils is 1,200 bph. These rates keep the Terminal line pressures under a maximum of 150 psi for which the Terminal's lines are rated. The start up is coordinated by telephone with the Plantation Pipeline Company operator. At the beginning of the receipt, the Terminal's receipt tank and pipelines are checked to ensure that there is no leakage and that the product is being received into the proper tank.

The Terminal is manned during the receipt when product or tank changes are made. Terminal personnel coordinate this activity with the pipeline operator.

The Terminal is manned at the end of the receipt. All tank and Terminal pipeline valves are closed after the receipt. Samples are taken from each tank which received product. Samples are tested for gravity, appearance, color, and flashpoint depending on the product sampled.

The Terminal has a direct telephone line to the Plantation Pipeline Company's pumping or control center to direct all pumping start ups and shut downs.

All tanks have a high level alarm system. The Plantation Pipeline Company's pumping station or control center has access to this alarm system. The pipeline operator can initiate an emergency shutdown if necessary. The alarm system on each tank is set at a level to allow the pipeline operator sufficient time to immediately cease pumping operations prior to a tank overflow. Subsequent to such a shutdown, the Terminal Manager or the designated person in charge would be notified via the Terminal's 24-hour emergency phone number.

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DOT / PHMSA /OPS Pipeline at the Columbus, GA, Terminal

The Colonial Pipe Line Company provides petroleum products to the terminal through an 8” diameter pipe line segment from their nearby pipe line stations. This 1,120’ pipe line segment connects directly to the pipeline receipt manifold in the terminal. The Plantation Pipe Line segment into the terminal is the property of MPC. A synopsis of information on the pipeline follows:

Pipe Line Name	Description	Owner	DOT/PHMSA/OPS Responsibility
Plantation Pipe Line from nearby station to terminal pipeline manifold	One buried 8” diameter diesel oil / gasoline pipe line approximately 1120’ long,, supply only, no discharge capability.	MPC	MPC

The MPC-owned Plantation Pipe Line segment is subject to regulation by the DOT/PHMSA/OPS and is covered by this response plan. A regulatory cross reference is provided in the Table of Contents, a DOT/PHMSA/OPS Information Summary is included in the INTRO Section, and a schematic jurisdictional drawing is provided in Section G on the Site diagram This pipeline segment consist of a gate valve and check valve at the manifold in the PPL station and the connecting pipeline segment to the pipeline manifold in the MPC terminal. The pipe line segment can only be used for delivery – the terminal cannot pump back into the segment.

Compliance with DOT/PHMSA/OPS regulations requires that written procedures be prepared for “**Abnormal and Emergency Situations and Response for Pipelines.**” These procedures have been prepared and are an appendix to this section.

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FACILITY DRAINAGE / SECONDARY CONTAINMENT

General Facility Drainage

Drainage valves will be kept closed until a drainage event occurs.

All potential drainage water is inspected before the dike drains are opened to ascertain that water may be drained without releasing pollutants. Visual inspection for any hydrocarbon sheen on the water is conducted throughout discharge. Prior to discharge of water any hydrocarbon sheens observed would be removed by use of oil absorbent materials, skimmers, vacuum truck, or other means.

All water drainage from secondary containment is performed by facility personnel under the direction of the Terminal Manager or Lead Operator.

The procedure is monitored until a sufficient amount of water has been removed. The drainage valve will then be closed and locked.

A written record of dike drainage events will be kept, utilizing the drainage form shown in Section L of this FRP. This written record will be maintained at the terminal in accordance with established regulations and records management procedures.

Outside of dikes storage areas, a natural drainage path has developed in the graveled manifold and additive tank area located south of the loading rack and east of the office building. Drainage from the concrete area surrounding the loading rack as well as the grassy area south of the manifold area flows to a natural path which flows westward through the O/W separator and VRU area and along the west side of the waste water accumulation tanks to the concrete spillway located at the northwest corner of the site. Site personnel have maintained this natural path for effective site drainage. Any rupture or leakage of aboveground piping in these areas, leaks or spills during unloading operations at the additive tanks, rupture of 55 gallon drums, or truck ruptures or leaks while not within the loading rack area would flow to this drainage path. Upon exiting the site, the flow would readily enter Cooper Creek.

Secondary Containment and Drainage for Tankage

All product tanks at the Terminal are surrounded by dikes. The dikes were built out of native soils. The additive tanks are either diked, curbed, or have a concrete retaining wall surrounding them. The tank dikes are sufficiently impervious to contain spilled oil until the oil spill contingency plan can be implemented. Storm water from the areas surrounding the bulk storage tanks gravity drains to environmental catch basins. The area around Tanks 15-1, 15-2, 20-4, and 30-5 drain to one catch basin. The other two tanks, 20-7 and 30-6, drain to another point. Both catch basins have manually-controlled dike drains with locked gate valves.

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Available Volume of Containment

See the Site & Flow Diagram in Section G for containment particulars.

(b) (7)(F)

Routes of Stormwater Drainage from Oil Storage Areas

Containment of an oil spill, leak, or drip and prevention of spilled materials from reaching navigable waters is accomplished by means of dikes. Stormwater from the areas surrounding the bulk storage tanks gravity drains to environmental catch basins. The area around tanks 15-1, 15-2, 20-4, and 30-5 drain to one catch basin. The other two tanks, 20-7 and 30-6, drain to another point. Both catch basins have manually controlled dike drains with locked gate valves. The drains' outfalls are toward Cooper Creek, which is located just to the west of the terminal.

Construction Materials Used in Drainage Troughs

Drainage is over earth, gravel, blacktop and cement.

Type and Number of Valves Used in the Drainage System

See the Site & Flow Diagram in Section G for valves locations.

All valves are open and closed type valves. No flapper valves are used. See the Site & Flow Diagram in Section G for valve locations.

Sump Pump Capacities

There are no sump pumps in drainage.

Containment Capacity of Weirs and Booms

There are no weirs or booms in containment.

Other Cleanup Materials

None

Secondary Containment and Drainage for Loading Facilities

The light oil loading racks at the Terminal have drains under every bay. The drains are connected directly to the 10,000-gallon oil/water separator. The recovered product is returned to the transmix tank and the accumulated water is diverted to the 12,500-gallon wastewater accumulation tanks (WAT). This water is then hauled off-site.

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CONTAINMENT AND RECOVERY

Many techniques exist for containing petroleum product spills. Natural features, weather conditions, and local situations will dictate how the spill is to be contained. This should be done during the initial assessment phase of the contractor's response. At times and under certain conditions it may be necessary to deploy multiple containment areas and protective/deflective booms to aid in the collection and the sheltering of environmentally sensitive areas.

Containment scenarios involving gasoline products must be treated with extreme caution. Due to the flammable/combustible nature of these products, vapor suppression should be exercised. Explosimeter readings should be taken at regular intervals at various locations.

Containment Considerations – Land

In the event of a catastrophic loss of a tank storing gasoline or oil, secondary containment is designed to contain the volume of the largest tank. Assuming this is an instantaneous release, some of the product might surge over the dike. In this case, the product could possibly flow in a southern direction.

Containment boom should be used as a precautionary measure.

Extreme caution should be exercised when determining if containment by booms of product is feasible.

Extreme caution should be employed when electing to contain gasoline. All efforts should be made to monitor and suppress vapors.

When recovering gasoline products, ensure that all mechanical, electrical, and manual equipment are rated for Class I, Group D environments.

Containment Considerations – Water

Booms will be deployed to contain any releases. Any environmentally sensitive areas requiring deflecting boom are noted on the maps in Section G.

Recovery Considerations – Land

Once stable containment has been achieved, cleanup and recovery will begin. Several methods exist to cleanup and recover product.

In containment ditches, sorbent material, vacuum trucks, or soil removal can be utilized.

For product standing on soil, a collection point can be excavated and lined to receive product by herding.

For product standing on semi-permeable ground, sorbent materials, vermiculite/perlite, or flushing to a collection pond can be utilized.

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Product that remains inside the permanent diked area can be recovered by means of vacuum units, earth removal equipment, and sorbent material.

Any product that flows into the storm drain can be flushed, contained, or removed at the outfall location. This would need to be coordinated with local government agencies.

Recovery Considerations – Water

Once stable containment has been achieved, cleanup and recovery will begin. Many methods exist to clean up and recover product.

Directing the containment boom towards a collection point is most common. Skimmers and direct vacuum can be used at narrow collection points along with sorbent materials for residual sheen. Prop wash and herding can be used to drive the product to the collection point. Skimmer boats can be used in a wide open boom situation where a collection point would be difficult to establish. Small inlets, coves, and slips, which are completely enclosed, make ideal collection areas.

When cleaning and recovering product from beaches, standard sand removal is utilized. Restoration of the beach will commence after the area is deemed clean.

When cleaning riprap and seawalls, high pressure hosing is generally used. Secondary methods include steam cleaning. Before steam cleaning is chosen, be sure to contact the governing environmental agency to determine whether steam cleaning is detrimental to certain marine organisms.

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GUIDELINE 1

Considerations for Spills of High Flash Oils into Water

(Flash Point Higher than 100° Fahrenheit)

NOTE: Personnel safety is the primary consideration in any emergency. Avoid excessive exposure to liquid and vapors. These procedures are considerations only. Actual circumstances may dictate that procedures followed may differ somewhat from those listed below.

These materials are not extremely flammable and the preferred response is containment and mechanical recovery.

- Determine the direction and expected duration of spill movement.
- Deploy containment boom and skimmers in attempt to contain and recover as much oil as possible. Monitor the boom for effectiveness.
- Advise boats operating in the area of potential danger and direct them out of the area.
- Request that the U.S. Coast Guard establish vessel traffic control or a “no wake” zone in the area.
- If the spill escapes the immediate area, review the location of environmentally sensitive areas and the Response Maps. Determine which of these may be threatened by the spill and direct the clean-up contractor to proceed to these locations and protectively boom sensitive areas.

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GUIDELINE 2

Considerations for Spills of Low Flash Oils into Water

(Flash Point Lower than 100° Fahrenheit)

NOTE: Personnel safety is the primary consideration in any emergency. Avoid excessive exposure to liquid and vapors. These procedures are considerations only. Actual circumstances may dictate that procedures followed may differ somewhat from those listed below.

These materials float on water and are extremely flammable. With low flash oils (gasoline) significant evaporation will occur if the material is dispersed over water. Consideration should be given to whether or not permitting the material to evaporate and disperse is preferable to attempting to contain an extremely flammable material that may be at explosive concentrations. The preferred response is to protect shorelines from fouling and/or allow evaporation to occur, then contain the spill, and recover.

- Determine the direction and expected duration of spill movement.
- Deploy containment boom and skimmers in an attempt to contain and recover as much oil as possible. Monitor the boom for effectiveness.
- Advise boats operating in the area of potential danger and direct them out of the area.
- Request that the U.S. Coast Guard establish vessel traffic control or a “no wake” zone in the area and an advisory noting “High Flammability.”
- If the spill escapes the immediate area, review the location of environmentally sensitive areas. Determine which of these may be threatened by the spill and direct the clean-up contractors to proceed to these locations to protectively boom sensitive areas.
- After light ends have dissipated so that the flash point is above 100°F, containment will become more practical.

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GUIDELINE 3

Considerations for Spills on Land

NOTE: Personnel safety is the primary consideration in any emergency. Avoid excessive exposure to liquid and vapors. These procedures are considerations only. Actual circumstances may dictate that procedures followed may differ somewhat from those listed below.

- Start confinement operations immediately to prevent oil from reaching waterways or groundwater.
- Consider covering oil with foam.
- If the ground is permeable, line and dike a temporary storage location.
- Be alert for underground utilities and water-bearing formations. Remember that oil may penetrate deeper if impermeable natural layers are disturbed.
- If oil enters any underground piping system (electrical, cable, telephone, etc.), contact operator immediately.
- Do not allow vehicles to run over saturated areas.
- For low flash product, use non-sparking systems, have fire trucks or firefighting equipment nearby, and inform personnel involved of the product's flammability.

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MARATHON PETROLEUM COMPANY LLC (MPC)

Abnormal and Emergency Situations and Response for Pipelines Servicing MPC TT&R Terminals

NORMAL, ABNORMAL, AND EMERGENCY ALARMS AND GENERAL RESPONSES

The purpose of this section is to define Normal and Abnormal operations and Emergency events, and provide general guidelines for MPC TT&M terminals serviced by Pipelines.

MPC TT&M's foremost objective is to operate terminals within the respective design limits of those facilities. In most cases, Pipelines deliver refined products to MPC terminals and in some cases MPC terminals pump into Pipelines. To ensure the safe operation of Pipelines connected to MPC terminals, safety devices are installed and operating procedures are developed to insure that normal operating conditions do not exceed the design limits of the Pipeline. The following definitions should be considered when determining the proper response to a given situation.

DEFINITIONS FOR NORMAL AND ABNORMAL OPERATIONS AND EMERGENCY EVENTS

- A. Normal Operations - Operations that are within current operating parameters (e.g. flow rate, pressure)
- B. Abnormal Operations - Operations that are outside current operating parameters.
 - 1. Typical response for any Abnormal Operation:
 - a. Attempt to determine the cause of the Abnormal Operation.
 - b. Take appropriate action to correct cause of Abnormal Operation.
 - c. Notify the designated responsible person, Pipeline Operator, and 1-877-MAPLINE.
 - d. Check for variations from Normal Operations after Abnormal Operation has ended to assure the integrity and safety of the system.
 - 2. Examples of Abnormal Operation:
 - a. Unintended Pipeline valve closures or shutdowns.
 - b. Pressure surges exceeding 110% of Pipeline operating pressure limits.

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- c. Sustained pressure or flow rates above or below current operating limits.
 - d. Sustained loss of communication.
 - e. Operations of any safety device, including alarms, relief valves, or rupture discs.
 - f. Any other component malfunction or personnel error that could cause a hazard to persons or property.
- C. Emergency Event – A Pipeline event involving, or which could imminently involve, a MPC terminal which might be hazardous to persons or property. An emergency event requires immediate response.
- 1. Typical response for any Emergency event:
 - a. Shut down the Pipeline and isolate the emergency area.
 - b. Notify the appropriate Pipeline Operations Center personnel immediately by telephone.
 - c. If warranted, designated MPC personnel should notify the local fire, police or sheriff.
 - d. If warranted, designated MPC personnel should notify government agencies.
 - e. Check for variations from normal operations when restarting the system to assure the integrity and safety of the system.
 - f. Notify 1-877-MAPLINE.
 - 2. Examples:
 - a. Fire or explosion occurring near or directly involving a Pipeline at a terminal.
 - b. Accidental release of hazardous liquid from a Pipeline.
 - c. Pipeline operational failure causing a hazardous condition.
 - d. Natural disaster affecting a Pipeline

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STANDARD PROCEDURES FOR NORMAL, ABNORMAL, AND EMERGENCY ALARMS

The following procedures address specific alarms or situations and describe a general response. Terminal personnel must use their judgement in any situation in order best respond to a given situation. The Pipeline Operations Center personnel should be contacted immediately to be sure of the procedure when in doubt. MPC should be notified by calling 1-877-MAPLINE.

All abnormal and emergency situations should be documented and logged in the terminal log. Items that should be indicated are time of incident or alarm, who was contacted, what time the contact was made, what was done to correct the situation, and any other information which may be important to determining the cause of situation.

I. ABNORMAL AND EMERGENCY SITUATIONS AND RESPONSES

Terminal personnel must react immediately to abnormal or emergency situations. Abnormal situations must be immediately evaluated and corrective action taken. Emergency situations require that the Pipeline be shut down and the emergency area isolated. In addition, the appropriate Pipeline Operations Center personnel and Pipeline field personnel should be notified immediately. Prior to restarting the affected Pipeline, terminal personnel should receive notification from Pipeline personnel that the integrity and safety of the Pipeline is intact.

A. COMMUNICATIONS FAILURE (Abnormal)

1. Contact the appropriate Pipelines Operations Center personnel and Pipeline field person for the affected location immediately. If communications are lost to the delivery station and communications have not been restored within 15 minutes, shut down the line.
2. After repairs are completed, the designated field person and/or company representative should contact Pipeline Operations Center personnel to verify the problem has been corrected. The time of this call should be logged in the terminal log.

B. FIRE (EMERGENCY)

The required action in this event is as follows:

1. Shut down the Pipeline and other terminal operations.
2. Make notification to appropriate Emergency Agencies.
3. Notify the Pipeline Operations Center personnel.
4. Take emergency response action as required by this FRP.

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5. Notify 1-877-MAPLINE.

C. FLOW RATE CHANGE (UNEXPLAINED) (Abnormal) Normally, terminal personnel will not be aware of flow rate changes. Most likely, the Pipeline Operations Center servicing the terminal will detect a fluctuation and notify terminal personnel. Terminal personnel may be asked to investigate and assist with determining the cause of the flow rate change.

The required action in this event is as follows:

1. Determine leak possibility from log checks, or meter readings.
 - a. Look for an established pattern of flow rate variation by reviewing logs or meters.
 - b. Attempt to explain the variation by presence of combinations of light and/or heavy fluids in the line, variations in pressures, or packing of the line due to unit run combinations changing.
 - c. If possible, verify meter reading with local personnel. Also compare tank gauges with meters if possible.
 - e. Inform appropriate field person of situation if problem persists.
 - f. Check receipt and delivery stations for flow rates, pressures and other pertinent data to see if they indicate the possibility of a leak.

D. GRAVITY CHANGE (UNEXPLAINED) (Abnormal)

The required action in this event is as follows:

1. Refer to appropriate schedule for explanation. The gravity change could be a result of cuts made along the system, manifold and tank line fills, unit starts, and pressure fluctuations.
2. Check for communications interruptions.
3. If the gravity change can't be explained, notify the appropriate Pipeline Operations Center personnel. If the risk of commingling product is imminent, shut down line.

E. HAZARDOUS ATMOSPHERE (EMERGENCY)

This condition could be caused by a leak in the station piping.

The required action in this event is as follows:

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1. If the units do not shut down, attempt to shut them down.
2. Notify field personnel immediately.
3. Potentially, the Pipeline Operations Center personnel may detect an alarm and request that terminal personnel investigate the cause of the alarm.

Delivery or Receipt Location -

The required action in this event is as follows:

1. Shut down the pipeline system affected by the alarm.
2. Notify field personnel immediately.
3. Notify the appropriate Pipeline Operations Center personnel if the alarm is determined to be valid upon investigation by field personnel.

F. HIT LINE/SUSPECTED LEAK NOTIFICATION (Abnormal)

A notification that one of our pipe lines may be experiencing a release or has been hit will in all probability be reported to MPC by a person other than a MPC employee. The required action in this event is as follows:

Be sure to get as much information as possible, with special attention to the following:

- Name of caller and phone number

- Location Information

State, County, Township, City, Street, Cross Street

1. Shut down the line(s) involved. If there are several lines in the area and a determination cannot be made as to which line is involved, shut down any Pipelines in the area until the hit line has been identified.
2. Immediately relay above information to the appropriate field person.
3. The line(s) will remain shut down until the damage is inspected by field personnel and a determination made whether to start up or remain down for repairs.
4. The appropriate Pipeline Operations Center personnel will notify terminal personnel of decisions regarding Pipeline start up or remaining shut down.
5. Notify 1-877-MAPLINE.

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G. LINE OVERAGES (Abnormal)

The required action in this event is as follows:

1. Try to determine if there is a measurement problem.
 - a. Look for established pattern of running over by reviewing previous logs.
 - b. Compare tank gauges with meters if possible.
 - c. Inform appropriate Pipeline Operations Center personnel of situation if problem persists.

H. LINE SHORTAGES (Abnormal)

The required action in this event is as follows:

1. Determine leak possibility from logs and meters.
 - a. Look for an established pattern of being short by reviewing previous logs.
 - b. If possible, verify meter reading with local personnel. Also compare tank gauges with meters if possible.
 - c. Inform appropriate Pipeline Operations Center personnel of situation if problem persists.
 - d. If problem is unresolved or remains unexplained, inform the Operations Center Supervisor and/or the Area Supervisor of the situation.

I. PERSONNEL ERROR (Abnormal)

A personnel error could cause an abnormal operation situation. When any act, accident, occurrence, unwanted release of energy, unwanted release or commingling of product, or near miss situation occurs that would NOT BE construed as normal operating procedures, action should be taken.

The required action in this event is as follows:

1. Analyze the situation and initiate corrective measures as needed.
2. Notify the appropriate field person if deemed necessary.
3. Notify the Pipeline Operations Center personnel.

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J. PRESSURE INCREASE (UNEXPLAINED) (Abnormal)

Normally, pressure increases will be seen first by the Pipeline Operations Center personnel, who will take appropriate corrective action. Any sudden and unexplained increase of pressure is cause for great concern. If there is no explanation for it, the system must be shut down immediately and the terminal personnel will be notified. The affected system should be monitored closely while shutting it down. Trending should be used to help determine pressure increase versus other events if necessary. The required action in this event is as follows.

1. Shut down system.
2. Notify terminal personnel.
3. Investigate and correct the problem.

K. PRESSURE LOSS (UNEXPLAINED) (Abnormal)

Normally, pressure decreases will be seen first by the Pipeline Operations Center personnel. A sudden loss of pressure could indicate a leak on the system. The line must be shut down, and terminal personnel notified to investigate.

The system should be monitored closely while shutting it down. Trending should be used to help determine pressure drop versus other events if necessary.

The required action in this event is as follows:

1. If unexplained, shut down system.
2. Notify terminal personnel.

L. PRESSURE RELIEF (EMERGENCY)

The required action in this event is as follows:

1. Shut down the line on which the pressure relief is occurring.
2. Notify the appropriate Pipeline Operations Center personnel immediately.
3. Wait for clearance from Pipeline Operations Center personnel before restarting line.

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N. TANK FIRE (EMERGENCY)

The required action in this event is as follows:

1. Shut down the flow into tank if the alarm is generated by a tank that is being pumped into. (If the tank is being pumped down at the time the alarm is generated, continue pumping out).
2. Call the appropriate Pipeline Operations Center personnel immediately.
3. Take action as required by the Terminal Fire Plan.
4. Notify 1-877-MAPLINE.

O. TANK LEVEL CHANGE (UNEXPLAINED) (Abnormal)

The required action in this event is as follows:

1. Determine leak possibility:
 - a. Attempt to explain the change by communications interruptions, weather-related occurrences, or special usage (such as tanks used for truck unloads).
 - b. Verify tank gauge reading with local personnel. Compare tank gauges with meters.
 - c. Inform appropriate field person of situation if problem persists.
 - d. If problem is unresolved or remains unexplained, inform the Pipeline Operations Center personnel.

P. OIL SPILL (EMERGENCY)

NOTE: See the FRP for detailed response procedures.

An oil spill at one of our stations may be reported to the Operations Center by a person other than a MPL employee using the 800 phone numbers.

The required action in this event is as follows:

1. Immediately relay above information to the appropriate field personnel and be sure that the Pipeline Operations center Personnel is aware of the situation.
2. Shut down line section involved unless advised otherwise by the field personnel.

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4. Take action as required by this FRP.
5. Notify 1-877-MAPLINE.

Q. UNIT SHUTDOWN (UNEXPLAINED) (Abnormal)

The required action in this event is as follows:

1. Any restart must be coordinated with the appropriate Pipeline Operations center personnel and terminal personnel. Attempt to restart unit as directed. Monitor the unit and station closely for any variations from normal.
2. If unit will not restart and is needed for throughput requirements, take action as directed by the Pipeline Operations Center personnel.

R. UNIT STARTUP (UNEXPLAINED) (Abnormal)

Manned Station

The required action in this event is as follows:

1. Call the station operator to investigate the problem.

S. VALVE CLOSURE (UNEXPLAINED) (EMERGENCY)

Normally, the Pipeline Operations Center personnel will determine that a valve has closed and take appropriate action. Terminal personnel may be asked to assist in determining the cause of the valve closure.

1. As directed, attempt to reopen the valve. If the valve remains closed and has inhibited the flow of fluid, shut down the affected line. Whether or not the valve opens, proceed with step 2.
2. Call the Pipeline Operations Center personnel for direction.

T. VALVE OPENING (UNEXPLAINED) (Abnormal)

Normally, the Pipeline Operations Center personnel will determine that a valve has opened and take appropriate action. Terminal personnel may be asked to assist in determining the cause of the valve opening.

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The required action in this event is as follows:

1. As directed, attempt to close valve. If valve will not go closed and a possibility of contamination exists, shut down the affected system. Whether or not the valve closes, proceed with step 2.
2. Call the appropriate Pipeline Operations Center personnel for direction.

U. TANK OVERFILL

All MPC oil storage tanks are fitted with high-high level alarms connected to an uninterruptible power supply. If a high-high level alarm is triggered, an alarm sounds at the terminal, and at the appropriate Pipelines Operations Center. The autodialer is triggered and calls terminal personnel and MAPLINE. The autodialer message must be acknowledged or it will continue to dial. It also might want to be noted that the two alarms are from two independent systems. Therefore, there is a backup in case one fails. The signals are "supervised" meaning that if a connection comes loose or there is a broken wire, you will also be notified.

If terminal personnel become aware of a tank overfill, do the following:

1. Shutdown the pipeline.
2. Investigate the problem and take corrective action.
3. Notify 1-877-MAPLINE.

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**Section D: Incident Strategies / Oil Spill Response Planning
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PLANNING DISTANCE CALCULATION

In order to determine an appropriate area of concern between the Terminal and sensitive environments in the event of a release, the EPA has developed mechanisms for the calculation of a facility's planning distance.

40 CFR 112 Appendix C, Attachment C-III provides instruction for the calculation of a planning distance from a facility's point of discharge over land and on still, tidal-influenced, and moving, navigable waters.

Horizontal Range Over Land

As outlined in 40 CFR 112, appendix C, Attachment C-III, Sections 5.5 and 5.6, there is no requirement to calculate flow over land if the facility is less than 0.5 mile from a navigable waterway.

A discharge of product of any size that would leave the Terminal property would most likely flow in a southwest direction into Cooper Creek. Cooper Creek is a shallow, winding, slow-moving creek that is joined by Cooper Branch and flows into Cooper Creek Lake. The distance between the likely point of entry into Cooper Creek and the point of entry into Cooper Creek Lake is approximately one mile. If released material traverses across Cooper Creek Lake, it would reenter Cooper Creek and flow for approximately 2.6 miles before flowing into Bull Creek. Product may flow approximately 6.1 miles on Bull Creek before reaching the Chattahoochee River.

The Worst Case Planning Distance for the Columbus, Georgia Terminal consists of multiple parts: (1) the distance between the point of entry into Cooper Creek and Cooper Creek Lake, (2) the distance across Cooper Creek Lake, (3) the distance between the point of reentry into Cooper Creek and point of entry into Bull Creek, (4) the distance between the point of entry into Bull Creek and the point of entry into the Chattahoochee River, and (5) the distance product may travel along the Chattahoochee River.

Because no flow data for Cooper Creek or Bull Creek were available from the U.S.G.S. or local sources, the planning distance for a worst case discharge was calculated based on an average flow for the Chattahoochee River.

Equation to Determine Planning Distance for Oil Transport on Navigable Waters

$$d = d_1 + d_2 + d_3 + d_4 + d_5$$

d_1 = distance between point of entry into Cooper Creek and Cooper Creek Lake

d_2 = distance across Cooper Lake

d_3 = distance between point of reentry into Cooper Creek and point of entry into Bull Creek.

d_4 = distance between point of reentry into Bull Creek and point of entry into Chattahoochee River.

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d_5 = distance that spilled material could travel down the Chattahoochee River.

d_1 = .75 mile

d_2 = 4 mile

d_3 = 2.6 miles

d_4 = 6.1 miles

$d_5 = (v_5) * (t_5) * (c)$

v_5 = 1.62 ft/s; estimated river velocity

t_5 = time necessary to travel d_5 ; up to the designated 27 hr response time (24 hours for arrival of spill response organization plus 3 hours for deployment)

c = .68 [(s*mi)/(hr*ft)]; constant conversion factor

Estimated River Velocity (ft/s)

In lieu of using the Chezy-Manning's equation to estimate the velocity of the Chattahoochee river, U.S.G.S. data were available. A mean velocity of 1.62 ft/s for U.S.G.S. Station 02341505 (Chattahoochee River at US 280, near Columbus, GA) was obtained at the following internet address:

http://nwis.waterdata.usgs.gov/nwis/measurements/?site_no=02341505&agency_cd=USGS

Based on the velocity obtained for the Chattahoochee River, released product would travel the distance between the Columbus Terminal and the Chattahoochee River in approximately nine hours. Because the total time for calculating a planning distance is 27 hours, the time remaining for the product to flow on the Chattahoochee River is 18 hours.

Planning Distance Calculation

$$d = d_1 + d_2 + d_3 + d_4 + d_5$$

$$d = d_1 + d_2 + d_3 + d_4 + [(v_5) * (t_5) * (c)]$$

$$d = 0.75 + 0.4 + 2.6 + 6.1 + [(1.62) * (18) * (0.68)]$$

$$d = 9.89 + 20$$

$$d = 30 \text{ miles}$$

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EPA PLANNING VOLUME CALCULATIONS

In order to satisfy EPA requirements at 40 CFR 112.20, an owner or operator must complete planning volume calculation worksheets if the facility could cause substantial harm to the environment. These worksheets are contained in Appendix D to 40 CFR 112.

For MPC Columbus, GA Light Products Terminal

Part A.1 For facilities containing only one aboveground oil storage tank, the worst case discharge planning volume equals the capacity of the oil storage tank. If adequate secondary containment (sufficiently large to contain the capacity of the aboveground oil storage tank plus sufficient freeboard to allow for precipitation) exists for the oil storage tank, multiply the capacity of the tank by 0.8.

A.1 N/A

Part A.2 Are *all* aboveground storage tanks or groups of aboveground oil storage tanks at the facility *without* adequate secondary containment?

A.2 No

Part A.2.2 If the answer is no, calculate the total aboveground oil storage capacity of tanks without secondary containment. If *all* aboveground oil storage tanks or groups of aboveground oil storage tanks at the facility have adequate secondary containment, ENTER "0" (zero).

A.2.2 0

Part A.2.3 Calculate the capacity of the largest single aboveground oil storage tank within an adequate secondary containment area or the combined capacity of a group of aboveground oil storage tanks permanently manifolded together, whichever is greater, PLUS THE VOLUME FROM QUESTION A.2.2.

A.2.3 There are no permanently manifolded tanks at this Terminal.

(b) (7)(F)

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Attachments to Appendix E

Attachment E-1
Worksheet to Plan Volume of Response Resources
for Worst Case Discharge

Gasoline

Part I Background Information

Step (A) Calculate Worst Case Discharge in barrels (Appendix D) [**Group I Oils**] (b) (7)
(A)

Step (B) Oil Group¹ (Table 3 and section 1.2 of this appendix) 1
(B)

Step (C) Operating Area (choose one) Nearshore/Inland Great Lakes or Rivers and Canals

Step (D) Percentages of Oil (Table 2 of this appendix)

Percent Lost to Natural Dissipation
80
(D1)

Percent Recovered Floating Oil
10
(D2)

Percent Oil Onshore
10
(D3)

Step (E1) On-Water Oil Recovery $\frac{\text{Step (D2)} \times \text{Step (A)}}{100}$ (b) (7)
(E1)

Step (E2) Shoreline Recovery $\frac{\text{Step (D3)} \times \text{Step (A)}}{100}$ (b) (7)
(E2)

Step (F) Emulsification Factor (Table 3 of this appendix) 1.0
(F)

Step (G) On-Water Recovery Resource Mobilization Factor (Table 4 of this appendix)

Tier 1
0.30
(G1)

Tier 2
0.40
(G2)

Tier 3
0.60
(G3)

¹ A facility that handles, stores, or transports multiple groups of oil must do separate calculations for each oil group on site except for those oil groups that constitute 10 percent or less by volume of the total oil storage capacity at the facility. For purposes of this calculation, the volumes of all products in an oil group must be summed to determine the percentage of the facility's total oil storage capacity.

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Environmental Protection Agency

Pt. 112, App. E

Attachment E-1 (Continued)
Worksheet to Plan Volume of Response Resources
for Worst Case Discharge

Part II On-Water Oil Recovery Capacity (barrels/day)

Tier 1	Tier 2	Tier 3
(b) (7)(F)		
Step (E1) x Step (F) x Step (G1)	Step (E1) x Step (F) x Step (G2)	Step (E1) x Step (F) x Step (G3)

Part III Shoreline Cleanup Volume (barrels) (b)
Step E2 x Step (F)

Part IV On-Water Response Capacity By Operating Area
(Table 5 of this appendix)
(Amount needed to be contracted for in barrels/day)

Tier 1	Tier 2	Tier 3
1,875	3,750	7,500
(J1)	(J2)	(J3)

Part V On-Water Amount Needed to be Identified, but not Contracted for in Advance (barrels/day)

Tier 1	Tier 2	Tier 3
---	---	---
Part II Tier 1 – Step (J1)	Part II Tier 2 – Step (J2)	Part II Tier 3 – Step (J3)

NOTE: To convert from barrels/day to gallons/day, multiply the quantities in Parts II through V by 42 gallons/barrel.

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Attachments to Appendix E

Attachment E-1
Worksheet to Plan Volume of Response Resources
for Worst Case Discharge

Diesel Oil

Part I Background Information

Step (A) Calculate Worst Case Discharge in barrels (Appendix D) [**Group II Oils**] (b) (7)
(A)

Step (B) Oil Group¹ (Table 3 and section 1.2 of this appendix) 2
(B)

Step (C) Operating Area (choose one) Nearshore/Inland Great Lakes or Rivers and Canals

Step (D) Percentages of Oil (Table 2 of this appendix)

Percent Lost to Natural Dissipation	Percent Recovered Floating Oil	Percent Oil Onshore
40	15	45
(D1)	(D2)	(D3)

Step (E1) On-Water Oil Recovery $\frac{\text{Step (D2)} \times \text{Step (A)}}{100}$ (b) (7)
(E1)

Step (E2) Shoreline Recovery $\frac{\text{Step (D3)} \times \text{Step (A)}}{100}$ (b) (7)
(E2)

Step (F) Emulsification Factor (Table 3 of this appendix) 1.8
(F)

Step (G) On-Water Recovery Resource Mobilization Factor (Table 4 of this appendix)

Tier 1	Tier 2	Tier 3
0.30	0.40	0.60
(G1)	(G2)	(G3)

¹ A facility that handles, stores, or transports multiple groups of oil must do separate calculations for each oil group on site except for those oil groups that constitute 10 percent or less by volume of the total oil storage capacity at the facility. For purposes of this calculation, the volumes of all products in an oil group must be summed to determine the percentage of the facility's total oil storage capacity.

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Environmental Protection Agency

Pt. 112, App. E

Attachment E-1 (Continued)
Worksheet to Plan Volume of Response Resources
for Worst Case Discharge

Part II On-Water Oil Recovery Capacity (barrels/day)

Tier 1	Tier 2	Tier 3
(b) (7)(F)	(b) (7)(F)	(b) (7)(F)
Step (E1) x Step (F) x Step (G1)	Step (E1) x Step (F) x Step (G2)	Step (E1) x Step (F) x Step (G3)

Part III Shoreline Cleanup Volume (barrels) (b) (7)
Step E2 x Step (F)

Part IV On-Water Response Capacity By Operating Area
(Table 5 of this appendix)
(Amount needed to be contracted for in barrels/day)

Tier 1	Tier 2	Tier 3
1,875	3,750	7,500
(J1)	(J2)	(J3)

Part V On-Water Amount Needed to be Identified, but not Contracted for in Advance (barrels/day)

Tier 1	Tier 2	Tier 3
---	---	---
Part II Tier 1 – Step (J1)	Part II Tier 2 – Step (J2)	Part II Tier 3 – Step (J3)

NOTE: To convert from barrels/day to gallons/day, multiply the quantities in Parts II through V by 42 gallons/barrel.

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VULNERABILITY ANALYSIS / SENSITIVE AREAS

The following pages discuss critical and sensitive areas considered in developing priorities for deploying spill response resources in the area of the Columbus Terminal. The information in this section will assist in identifying critical environmentally sensitive areas and aid in determining booming strategies.

Information regarding the actual location of a spill and visual observation/verification of spill movement must be used to make a final determination in developing a response strategy.

Response Considerations

A description of key features is provided below.

Critical Areas to Monitor or Protect

- Critical areas are those areas which, if impacted by spilled oil, may result in threats to the safety or health of the general public. These include commercial water intakes/water wells, highly developed or populated public areas, or marinas.

Developed

- These areas are defined as areas with a concentrated presence of man-made structures.
- The impacts are in terms of public safety, visibility, aesthetics, and public relations, as well as oiling of piers and potential property damage/loss claims.

Water Intakes/Wells

- Intakes for commercial, industrial, and municipal water usage are subject to impact due to safety hazards, loss of use, and damage claims.
- Booming or other measures to protect these intakes/wells should be undertaken.

Recreation Areas

- Publicly accessible recreation areas generally have good water/shoreline access for logistical purposes.
- More importantly, these areas should be monitored for potential public safety/health threats.

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Marinas

- Marinas have a great potential for public exposure to hazards and damage. They should be boomed to exclude oil.

Environmental Sensitivities

The environmental sensitivity of shoreline types and habitats are prioritized into three categories (high, moderate, and low – see below), which will allow the responder to allocate response resources during the first stages of a response. The priorities are intended to assist responders initially with the knowledge that responsible federal and state resource agency representatives will arrive on site to further clarify priorities within each category. Areas with known populations of federal/state listed threatened or endangered species are also noted in this section.

High

- Habitats that have particularly high productivity or the presence of threatened or endangered species.
- Shallow flats, marshes, wetlands, and areas used for nesting by birds.
- Areas that are sheltered from energy generated by water movement and will tend to retain oil over time.
- Highly sensitive shorelines which are biologically productive environments where cleaning can be difficult and time consuming.
- Flats and marshes that support significant wildlife species.
- Marshes that are important to migrating bird species as stop-over, feeding, and overwintering areas.

Moderate

- Habitats that are somewhat resistant to the effects of oiling.
- Coarse and fine-grained sand beaches and gravel beaches.

Low

- Low productivity habitats and man-made structures, including erosional scarps, sand beaches, seawalls, jetties, piers, and bulkheads.

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Sensitive Areas Within Planning Distance of Facility

In order to determine specific vulnerable sites located within the planning distance of the facility, the Area Contingency Plan and the Geographic Names Information System (GNIS) database were reviewed and a comprehensive listing of vulnerable sites was compiled. The potential effect of an oil spill on each type of vulnerable site that is located within the planning distance is presented below. Additionally, the methods to prevent and/or minimize the impacts to the identified sensitive sites are discussed.

The specific actions considered to protect a vulnerable site, or to minimize the potential effects of a spill on a vulnerable site, would be tempered in a real spill event by the actual path of the spill and the actual hazards presented. For light product terminals, the spilled product could be gasoline, diesel (including kerosene and No. 2 diesel oil), ethanol or additives. For asphalt terminals, the spilled product could be kerosene, asphalt, asphalt emulsions, heavy fuel oil or additives. For specific guidance on the actual hazards of a release, the MSDS and the DOT Emergency Response Guidebook can be consulted for hazards and recommended evacuation distances. The specific actions taken should be as directed by the Unified Command under the Incident Command System.

Water Intakes

Water intakes are underwater structures used to collect water for public drinking water, public utilities, or private industry. In the event that a spill enters a body of water on which water intakes are present, the direct effects may include petroleum contamination of intake water, intake structures, and facility equipment. Indirectly, oiled vegetation or wildlife may be impinged onto or entrained into the structure resulting in damages to the intake structure. In addition to the emergency notifications detailed in Section B, response efforts may include strategic booming immediately around the spill area (source control), shutting down the water intake, or exclusion (protective) booming around potentially affected intake structures. The shutdown of water intakes as a preventative measure may result in social and economic impacts. Potential effects and specific response actions will depend on the nature of the released material.

There are no identified water intake areas at risk within the planning distance.

Schools

There are two potential effects from a release, direct contact with spilled material or exposure to flammable or irritating vapors. Direct contact with the spilled material would occur if the school was located in the spill pathway. In the event that a spill directly impacts the property of an educational institution, the effects may include: oiling of the school facility, equipment, and property; interruption of traffic flow to and from the facility; and potential fire hazards. Should human contact result from the spill, the potential exposure routes might include skin contamination, inhalation, or accidental ingestion. If confined in a waterway or low area, vapor impingement may occur on downwind areas. In this event, air monitoring for potential fire hazards and irritating vapors is the response requirement, depending on the nature of the released material. In

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addition to the emergency notifications detailed in Section B, responses to these effects may include source control, strategic booming immediately around the spill area, evacuation of students and personnel, rerouting of traffic near the facility, excavation of contaminated soil, monitoring and possible suppression of flammable/irritating vapors, and decontamination of oiled equipment, buildings, and pavement. Potential effects and specific response actions will depend on the nature of the released material.

(b) (7)(F)

Medical Facilities

Medical facilities are more likely affected by vapors downwind of the spill path than by direct contact with released product. In the event that a spill impacts the property of a medical facility, the effects may include: oiling of the facility, equipment, and property; interruption of traffic flow to/from the medical facility; and potential fire hazards. Should human contact result from the spill, the potential exposure routes might include skin contamination, inhalation, or accidental ingestion. Air monitoring for flammable and/or irritating vapors should be considered, depending on the nature of the released material. In addition to the emergency notifications detailed in Section B, responses to these potential problems might include the following: source control, strategic booming immediately around the spill area, rerouting of traffic near the facility, excavation of contaminated soil, monitoring and possible suppression of flammable/irritating vapors, and decontamination of oiled equipment, buildings, and pavement. Potential effects and specific response actions will depend on the nature of the released material.

There are no identified medical facilities at risk within the planning distance.

Residential Areas

A release of oil in the vicinity of a residential area may affect property, structures, and inhabitants. Specific effects may include oiled animals and vegetation, oiled homes and associated structures, and potential fire hazards. Should human contact result from the spill, the potential exposure routes might include skin contamination, inhalation, or accidental ingestion. If the spill has reached a waterway, or has been confined to a low area, vapor impingement is a potential problem downwind of the spill path. Vapors can be flammable, irritating, or may only pose an odor problem. Air monitoring should be conducted downwind of the spill path to monitor for vapors, depending on the nature of the released material. Responses to these effects may include strategic booming

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immediately around the spill area, evacuation of residents, rerouting of traffic, excavation of contaminated soil, suppression of flammable vapors, and decontamination of oiled buildings, structures, pavement, etc. Potential effects and specific response actions will depend on the nature of the released material.

Residential Areas
Shenandoah Forest (subdivision)
Northgate (subdivision)
Camelot (subdivision)
Kenwood (subdivision)
Castlewood (subdivision)
Georgian Hills (subdivision)
Woodlawn Estates
Edgewood
Alta Vista
Edgewood Terrace (subdivision)
East Edgewood
Glen Arden
Ridgeview Heights (subdivision)
Rosewood (subdivision)
Starmount (subdivision)
Pembrook (subdivision)
Carriage Estates (subdivision)
Parkchester
Brookhaven
Muscogee
Avondale Heights (subdivision)
Riverland Terrace
Broadmoor (subdivision)
Bradley Landing
Bon Acre Landing

Businesses

In the event that a spill impacts the property of a business, the effects may include: oiling of the facility, equipment, inventory, and property; interruption of traffic flow to/from the business; and potential fire hazards. A spill event that results in the closure of roads surrounding a business may also indirectly affect the business by the loss of revenue. Should human contact result from the spill, the potential exposure routes might include skin contamination, inhalation, or accidental ingestion. If the spill has reached a waterway, or has been confined to a low area, vapor impingement is a potential problem downwind of the spill path. Vapors can be flammable, irritating, or may only pose an odor problem. In addition to the emergency notifications detailed in Section B, responses to these effects may include strategic booming immediately around the spill area, protective booming of docks and marinas, evacuation of business owners, employees, and patrons, rerouting of traffic near the business, excavation of contaminated soil, suppression of flammable vapors, and decontamination of oiled buildings, structures,

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pavement, etc. Air monitoring should be conducted downwind of the spill path to monitor for vapors. Potential effects and specific response actions will depend on the nature of the released material.

Businesses
Fountain Park Shopping Center
Starmount Plaza Shopping Center
Saint Marys Hills Plaza Shopping Center

Wetlands

The effects of a release of oil into a wetland area might include oiling of animals, vegetation, and sediment and the creation of an oil slick on areas of open water. Because water movement within a wetland habitat is minimal, oil spilled in these areas may pool and may persist. Swamps and marshes often serve as nurseries for fish and shellfish and exhibit high biodiversity. Due to the typically soft sediments that underlie wetland areas, the use of mechanized equipment for clean up efforts may cause more harm than the initial oiling. Responses to these effects include strategic booming immediately around the spill area and protective booming around identified sensitive wetland areas, and will depend heavily on the nature of the wetlands and potential routes of access for collection equipment. Potential effects and specific response actions will depend on the nature of the released material.

There are no identified wetland areas at risk within the planning distance.

Fish and Wildlife

Fish and wildlife species may be impacted directly or indirectly by an oil spill. A direct impact on wildlife would include physical contact with the released oil (oiling of a bird's feathers or an otter's fur) and toxic contamination (inhalation of petroleum vapors or ingestion of oil). Indirect impacts on wildlife would include the destruction of a species' habitat or food source or the displacement of the species or food source.

Direct effects of oil on fish populations include fish kills, specifically the egg and larval stages, which are more vulnerable to oil pollution than those in the adult stage. Spills to rivers used for spawning or used for migration to spawning grounds can affect future populations. Fish that have been tainted by an oil spill may not be fit to eat, thus affecting animals higher in the food chain.

Depending on the life cycle, behavior, and physiology of a particular wildlife species, the effects of an oil spill can vary. Otters and beavers are vulnerable due to the structure of their fur as well as their swimming behaviors. Birds that utilize the water-surface interface are at risk of contamination. Heavily oiled birds typically die as a result of their contamination. The specific effects on wildlife will depend on the nature of the released material.

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Responses to these effects include strategic booming immediately around the spill area, protective booming around identified fish and wildlife habitat, and cleaning of affected animals by properly trained professionals. The response efforts in the direct vicinity of the impacted habitat depend heavily on the nature of the habitat and potential routes of access for collection equipment. Potential effects and specific response actions will depend on the nature of the released material.

Wildlife Rehabilitation

In an oil spill incident, it is possible that birds, aquatic life, and/or other wildlife may come in contact with the spilled material. If wildlife becomes involved in the spilled material, it will be necessary to perform wildlife rescue and rehabilitation operations. The capture and treatment of wildlife, especially endangered species, is highly regulated by the U.S. Department of the Interior. To conduct these operations, it will be necessary to obtain assistance from properly trained, licensed, and permitted organizations and personnel. It is important to ensure that any personnel involved in wildlife rescue and rehabilitation operations, including volunteers, have received the appropriate level of Hazardous Waste Operations and Emergency Response (HAZWOPER) training.

In the event that wildlife is impacted, advice and assistance from trained and experienced persons in the area of wildlife rescue and rehabilitation may be requested.

The Corporate Emergency Response Team (CERT) will arrange for various agencies to be available for this service, such as:

- Tri-State Bird Rescue and Research, Inc.
Newark, DE
Administrative: 302/737-9543
- International Bird Rescue Research Center (IBRRC)
Fairfield, CA
Administrative: 707/207-0830

There are no identified fish and wildlife areas at risk within the planning distance.

Lakes and Streams

Lakes are characterized by generally very low wave and current energy, although the surface may often become choppy. Water levels may fluctuate widely throughout the seasons and over time. Often other sensitive environments are in close proximity to lakes, such as wetlands, habitat for migratory birds, nesting birds and mammals, and fish nursery grounds. Lakes also often support various recreational activities. Depending on

the severity of the spill, the effects may range from shoreline damages to fish and wildlife kills. Wind and tidal exchange will control the distribution of a slick, and can either hold the slick against a lee shore or spread it along shores or even into previously clean areas.

Small rivers and streams are characterized by shallow water (one to two meters in depth) and narrow channels. These systems are highly variable. The flow rates can range from fast-flowing to slow-moving. The channels may be free of debris or choked with log jams, mid-channel sand bars, and islands. The shoreline may have a high slope or a low bank fringed with vegetation or wetlands. Slicks typically contaminate both banks. The oil may mix throughout the entire water column in shallower streams, thus potentially affecting both aquatic and benthic organisms.

Responses to these effects include strategic booming immediately around the spill area and protective booming around vulnerable areas such as the mouths of creeks and inlets, and will depend heavily on the nature of the habitat and potential routes of access for collection equipment. Deflection boom can also be used to direct floating spills from vulnerable areas. Potential effects and specific response actions will depend on the nature of the released material.

Lakes and Streams
Cooper Branch
Bull Creek Watershed Dam Number Three
Bull Creek Watershed Lake Number Three
Cooper Creek Dam
Cooper Creek Reservoir
Cooper Creek
Dram Branch
Lindsey Creek
Werocoda Creek
Bull Creek
Cochgalechee Creek
Mill Creek
Upatoi Creek
Broken Arrow Creek
Sewelson Creek
Uchee Creek
Gilbert Creek
Oswichee Creek
Harp Creek
Red Mill Creek
Smith Creek
Shell Creek

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Endangered Flora and Fauna

Oil spills affect endangered flora and fauna by either directly impacting the individual or by destroying the habitat in which the species lives. In addition to the emergency notifications detailed in Section B, responses to these effects may include strategic booming immediately around the spill area, excavation of contaminated soil, suppression of flammable vapors, and cleaning of affected animals by properly trained professionals. Protective booming around vulnerable areas, as well as booming the mouths of creeks where sensitive species have been identified, should be conducted. Deflection boom can also be used to direct floating spills from vulnerable areas. Potential effects and specific response actions will depend on the nature of the released material.

Based on our current findings, there are no known endangered flora or fauna species within the planning distance of the Terminal. Georgia has an Endangered and Threatened Species listing of 65 species. This list is provided solely for information purposes only.

Fauna	
Common Name	Status
Southern acornshell	Endangered
American alligator	Threatened
Purple bankclimber	Threatened
Gray bat	Endangered
Indiana bat	Endangered
Ovate clubshell	Endangered
Southern clubshell	Endangered
Upland combshell	Endangered
Amber darter	Endangered
Cherokee darter	Threatened
Etowah darter	Endangered
Goldline darter	Threatened
Snail darter	Threatened
Bald eagle	Threatened
Triangular kidneyshell	Endangered
Conasauga logperch	Endangered
West Indian manatee	Endangered
Alabama moccasinshell	Threatened
Coosa moccasinshell	Endangered
Gulf moccasinshell	Endangered
Ochlockonee moccasinshell	Endangered
Oval pigtoe	Endangered

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Fauna	
Common Name	Status
Southern pigtoe	Endangered
Piping plover (except Great Lakes Watershed)	Threatened
Finelined pocketbook	Threatened
Shinyrayed pocketbook	Endangered
Flatwoods salamander	Threatened
Green sea turtle	Threatened
Hawksbill sea turtle	Endangered
Kemp's ridley sea turtle	Endangered
Leatherback sea turtle	Endangered
Loggerhead sea turtle	Threatened
Blue shiner	Threatened
Eastern indigo snake	Threatened
Wood stork	Endangered
Shortnose sturgeon	Endangered
Roseate tern	Threatened
Fat three-ridge	Endangered
Bog turtle	Threatened
Finback whale	Endangered
Humpback whale	Endangered
Right whale	Endangered
Red-cockaded woodpecker	Endangered

Flora	
Common Name	Status
Little amphianthus	Threatened
Hairy rattleweed	Endangered
Smooth coneflower	Endangered
Swamp pink	Threatened
Black spored quillwort	Endangered
Mat-forming quillwort	Endangered
Small whorled pogonia	Threatened
Pondberry	Endangered
Mohr's Barbara button	Threatened

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Flora	
Common Name	Status
Canby's dropwort	Endangered
Harperella	Endangered
Michaux's sumac	Endangered
Kral's water-plantain	Threatened
Green pitcher-plant	Endangered
American chaffseed	Endangered
Large-flowered skullcap	Endangered
Fringed campion	Endangered
Virginia spiraea	Threatened
Florida torreyia	Endangered
Persistent trillium	Endangered
Relict trillium	Endangered
Tennessee yellow-eyed grass	Endangered

In the event of a release, MPC will coordinate with the United States Fish and Wildlife Service (USFWS), and state and local wildlife management groups to ensure the protection of all threatened and endangered species within a release area.

Recreational Areas

In the event that a spill impacts a recreational area, the effects may include: oiling of the area, structures, and property; interruption of traffic flow to/from the area; and potential fire hazards. Should human contact result from the spill, the potential exposure routes might include skin contamination, inhalation, or accidental ingestion. In addition to the emergency notifications detailed in Section B, responses to these effects may include strategic booming immediately around the spill area, evacuation of visitors and employees of the areas, rerouting of traffic near the recreational area, excavation of contaminated soil, suppression of flammable vapors, and decontamination of oiled structures, buildings, and pavement. Potential effects and specific response actions will depend on the nature of the released material.

Recreational Areas
Cooper Creek Park

Transportation Routes

Transportation routes are typically indirectly affected by a spill event through the interruption of traffic flow. Other effects may include: oiling of pavement, vegetation, and soil; the creation of an oil slick on areas of open water; and potential fire hazards. Should human contact result from the spill, the potential route of exposure might include

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skin contamination, inhalation, or accidental ingestion. In addition to the emergency notifications detailed in Section B, responses to these effects may include strategic booming immediately around the spill area, evacuation of persons traveling the route, rerouting of traffic by authorized personnel, excavation of contaminated soil, suppression of flammable vapors, and decontamination of oiled structures, buildings, and pavement, etc. The halting of river traffic in the case of a spill to a major waterway or rerouting vehicular traffic from business areas would likely result in economic impacts. Potential effects and specific response actions will depend on the nature of the released material.

Transportation Routes
Interchange 3
Nuckols Bridge
Eddy Bridge

Utilities

In the event that a spill impacts a utility line or right-of-way, the effects may include: oiling of pavement, vegetation, and structures; interruption of utility services to homes and businesses; the creation of an electrical hazard; and potential fire hazards. Should human contact result from the spill, the potential exposure routes might include skin contamination, inhalation, or accidental ingestion. In addition to the emergency notifications detailed in Section B, responses to these effects may include strategic booming immediately around the spill area, evacuation of persons near the utility line or right-of-way, rerouting of traffic by authorized personnel away from the utility line or right-of-way, excavation of contaminated soil, suppression of flammable vapors, and decontamination of oiled structures, buildings, and pavement, etc. Potential effects and specific response actions will depend on the nature of the released material.

There are no identified utilities at risk within the planning distance.

Others Areas of Economic Importance

In the event that a spill impacts an area of economic concern, the effects may include: oiling of vegetation, soil, and structures; interruption of traffic flow to/from the area; and potential fire hazards. Should human contact result from the spill, the potential exposure routes might include skin contamination, inhalation, or accidental ingestion. Responses to these effects depend heavily on the nature of the sensitive area and potential routes of access for collection equipment, but may include strategic booming immediately around the spill area, evacuation, rerouting of traffic, excavation of contaminated soil, suppression of flammable vapors, and decontamination of oiled equipment, buildings, and pavement, etc. Potential effects and specific response actions will depend on the nature of the released material.

Other Areas of Economic Importance
Milgen Industrial Park

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Other Areas of Economic Importance
Park Hill Cemetery
Holly Industrial Park
Super Drive-in Speedway
Bradley Landing
Uchi (historical)
Chambers Landing
Owens Hill
Stevenson Hill
Bon Acre Landing
Delario Hill
Cody Landing

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ANALYSIS FOR THE POTENTIAL FOR AN OIL SPILL

Oil Spill History

To our knowledge, there has never been a reportable spill in the history of the terminal.

Horizontal Range of a Potential Spill

The horizontal range of a spill is as indicated in the beginning of this section, beneath the heading “**PLANNING DISTANCE CALCULATION**”. Spills move with time, therefore, immediate action should be taken to minimize the potential impact and damage that a spill may have on an area. Oil moves across the surface of the water as a result of wind and current. It is important to have knowledge of tides, currents, prevailing winds, and other factors which will permit the prediction of how and where a slick will move.

Site Conditions

The Columbus Terminal is situated in Muscogee County, Georgia.

The tank farm is located near Cooper Creek.

The area in the vicinity of the Terminal consists of mixed residential and light industry.

The climate of Columbus is typical of the humid southeastern United States. It is sometimes influenced by maritime effects or by continental effects.

The weather in Columbus is moderate, with neither extreme heat nor extreme cold. The average high temperature is 76° F while the average low temperature is 54° F. High humidity is present, which adds to heat levels. Rain falls mostly during March and July with the driest months being October and November. Summer thunderstorms bring in large amounts of precipitation which averages 50.3 inches per year.

(Climate information was obtained on the Internet from the following sites:

<http://www.weatherbase.com/weather/weather.php3?s=552227&refer=> and

<http://www.pe.net/~rksnow/gacountycolumbus.htm>.)

Geographic Boundaries

The location boundaries established for the Columbus, Georgia Terminal are Interstate I-185, railroad tracks, forest, and industrial property.

Trajectory Analysis

Assumptions:

- Slicks move with the wind at approximately three to four percent of the wind velocity.
- When the wind velocity is low or wind is absent, the slick will tend to move with the current at about the same velocity and in the same direction as the current.
- When the wind is blowing, the slick will be affected by both water and wind currents, and the movement of the slick will be a function of both forces.
- When the wind direction is opposite to the current, the wind may reduce or possibly reverse the oil slick velocity at the surface.
- When high rainfall creates fast currents, wind will have little effect, if any, on slick movement. The slick will move at the same velocity and direction of the fast current.

A computer model may be used to estimate spill movements. Aerial surveillance provides the most effective means of determining spill size, location, and movement. Frequent helicopter and/or fixed wing aircraft overflights may be utilized for surveillance purposes.

Facility drainage information describing the movement of a released product over land or water may be found in Section C.

Vulnerability to Natural Disaster

Normal communications with area Disaster Services agencies will address planning contingencies for events such as, but not limited to the following:

- Earthquakes
- Tornadoes
- Flooding
- Severe thunderstorms

Storage tanks can be vulnerable to damage by very heavy rains if sufficient storm water accumulates in the tank's secondary containment, increasing the tank's buoyancy. Storage tanks can also be affected by very strong winds which can cause the tank to collapse. Both situations can be prevented by increasing the inventory in the tank to adequately anchor the system.

Tank Age and Other Factors Influencing the Potential for an Oil Spill

No other factors were noted.

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EPA REGULATED DISCHARGES

Small Case Discharge

Small Spill Response Resources

The terminal is a complex facility as described under OPA '90. The EPA small discharge amount for this facility is 2100 gallons.

From 40 CFR 112, Appendix E, the required small response resources consist of the following:

- 1000' of containment boom deployable within an hour of the detection of an oil discharge
- Oil recovery devices with an effective daily recovery capacity equal to 2100 gallons available within 2 hours of the detection of an oil discharge
- Daily oil storage capacity of 4200 gallons available for recovered oily material.

These resources are available from the local small spill OSRO..

A spill of this size could occur in one of six areas.

- Loading or Unloading of Surface Transportation
- Facility Maintenance
- Facility Piping
- Pumping Stations and Sumps
- Oil Storage Tanks
- Vehicle Refueling

Small Spill Scenarios & Factors

Loading or Unloading of Surface Transportation

Loading or Unloading of Surface Transportation Small Spill Scenarios

It's unlikely that a spill during loading would result in a release. The load rack has a quick drainage system leading to the oil water separator, and the driver's stand by during loading and would take immediate response actions.

Age and condition of loading or unloading equipment

The loading equipment at the Terminal was built in the 1960s and is in good working condition.

Estimate of size of a small case discharge that could occur in this area

If a small case discharge were to occur during the loading or unloading of surface transportation, the spill would likely be up to 50 barrels (2,100 gallons).

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Proximity to downgradient wells, waterways, and drinking water intakes

Please refer to the Vulnerability Analysis/Sensitive Areas portion of this section for well, waterway and water intake information.

The terminal is adjacent to Cooper Creek. There are no known water intakes.

Proximity to fish and wildlife and sensitive environments

Please refer to the Vulnerability Analysis/Sensitive Areas portion of this section for fish and wildlife and sensitive environment information.

The terminal is adjacent to Cooper Creek. There are no identified wetlands or sensitive areas downstream.

Likelihood that the discharge will travel off-site

If a small case discharge were to occur during the loading or unloading of surface transportation, it is unlikely for any released material to travel off-site. Released product will flow to trench drains then to the oil/water separator.

Location of the material spilled

If a small case discharge were to occur during the loading or unloading of surface transportation, the spilled material would be contained within the curbed loading area and would drain into an oil/water separator. The spilled material would remain in the truck unloading area.

Material discharged

If a small case discharge were to occur during the loading or unloading of surface transportation, the released material would be gasoline, diesel oil, transmix, ethanol or additive.

Weather or aquatic conditions

If a small case discharge were to occur during the loading or unloading of surface transportation, the released material would not be affected by weather or aquatic conditions. A small spill will be contained by trench drains and the oil/water separator.

Available remediation equipment

A full listing of emergency equipment at this Terminal is provided in Section L.

Probability of a chain reaction of failures

If a small case discharge were to occur during the loading or unloading of surface transportation, there is little probability of a chain reaction of failures. A truck spill is not likely to trigger additional discharges.

Direction of spill pathway

If a small case discharge were to occur during the loading or unloading of surface transportation, the released material would likely remain in the truck unloading area.

Facility Maintenance

Facility Maintenance Small Spill Scenarios

A release during facility maintenance likely would be small and contained. In addition, personnel would immediately see any release and take appropriate response action.

Estimate of size of a small case discharge that could occur in this area

If a small case discharge were to occur during facility maintenance activities, the spill would likely be up to 50 barrels (2,100 gallons).

Proximity to downgradient wells, waterways, and drinking water intakes

Please refer to the Vulnerability Analysis/Sensitive Areas portion of this section for well, waterway and water intake information.

The terminal is adjacent to Cooper Creek. There are no known water intakes.

Proximity to fish and wildlife and sensitive environments

Please refer to the Vulnerability Analysis/Sensitive Areas portion of this section for fish and wildlife and sensitive environment information.

The terminal is adjacent to Cooper Creek. There are no identified wetlands or sensitive areas downstream.

Likelihood that the discharge will travel off-site

If a small case discharge were to occur during facility maintenance activities, it is unlikely for any released material to travel off-site. All equipment subject to maintenance is contained within a secondary containment area.

Location of the material spilled

If a small case discharge were to occur during facility maintenance activities, the spilled material would be contained within adequate secondary containment.

Material discharged

If a small case discharge were to occur during facility maintenance activities, the released material would be gasoline, diesel oil, transmix, ethanol, or additive.

Weather or aquatic conditions

If a small case discharge were to occur during facility maintenance activities, the released material would not be affected by weather or aquatic conditions. The potentially affected equipment is contained within adequate secondary containment.

Available remediation equipment

A full listing of emergency equipment at this Terminal is provided in Section L.

Probability of a chain reaction of failures

If a small case discharge were to occur during facility maintenance activities, there is little probability of a chain reaction of failures. The Terminal has in place a program to isolate equipment undergoing maintenance from the process flow (Lock Out-Tag Out Program).

Direction of spill pathway

If a small case discharge were to occur during facility maintenance activities, the released material would likely drain to the secondary containment area.

Facility Piping**Facility Piping Small Spill Scenarios**

If a release occurs from facility piping it will likely be a slow leak since all piping is low pressure. In addition, almost all piping is located within secondary containment and almost all leaks would be contained. All piping is inspected each workday for leaks.

Age and condition of facility piping components

The piping from the tanks to the load racks is between 10 and 50 years old. All lines are in good condition.

Estimate of size of a small case discharge that could occur in this area

If a small case discharge were to occur within facility piping, the spill would likely be up to 50 barrels (2,100 gallons).

Proximity to downgradient wells, waterways, and drinking water intakes

Please refer to the Vulnerability Analysis/Sensitive Areas portion of this section for well, waterway and water intake information.

The terminal is adjacent to Cooper Creek. There are no known water intakes.

Proximity to fish and wildlife and sensitive environments

Please refer to the Vulnerability Analysis/Sensitive Areas portion of this section for fish and wildlife and sensitive environment information.

The terminal is adjacent to Cooper Creek. There are no identified wetlands or sensitive areas downstream.

Likelihood that the discharge will travel off-site

If a small case discharge were to occur within facility piping, it is possible for released material to travel off-site because facility piping is located both inside and outside of secondary containment.

Location of the material spilled

If a small case discharge were to occur within facility piping, the spilled material would remain on the ground or in a drain system that is contained.

Material discharged

If a small case discharge were to occur within facility piping, the released material would be gasoline, diesel oil, transmix, ethanol, or additive.

Weather or aquatic conditions

If a small case discharge were to occur within facility piping, the released material would be not affected by weather or aquatic conditions. A small case discharge would be contained within adequate secondary containment.

Available remediation equipment

A full listing of emergency equipment at this Terminal is provided in Section L.

Probability of a chain reaction of failures

If a small case discharge were to occur within facility piping, there is little probability of a chain reaction of failures. Piping to all tanks are separated by block valves at piping manifolds. If one pipe fails, it would be segregated from other piping by block valves.

Direction of spill pathway

If a small case discharge were to occur within facility piping, the spilled product could move in all directions, but would be contained by curbing or dikes.

Pumping Stations and Sumps

Pumping Station and Sumps Small Spill Scenarios

There are no sump pumps. All pumps are located above ground in secondary containment and any release would be contained. Any leaking pump would be found during the inspection conducted each workday.

Age and condition of pumping stations and sumps

The components used in pumping stations and/or sumps are 10 years old and are in good condition.

Estimate of size of a small case discharge that could occur in this area

If a small case discharge were to occur within pumping stations and/or sumps, the spill would likely be up to 50 barrels (2,100 gallons).

Proximity to downgradient wells, waterways, and drinking water intakes

Please refer to the Vulnerability Analysis/Sensitive Areas portion of this section for well, waterway and water intake information.

The terminal is adjacent to Cooper Creek. There are no known water intakes.

Proximity to fish and wildlife and sensitive environments

Please refer to the Vulnerability Analysis/Sensitive Areas portion of this section for fish and wildlife and sensitive environment information.

The terminal is adjacent to Cooper Creek. There are no identified wetlands or sensitive areas downstream.

Likelihood that the discharge will travel off-site

If a small case discharge were to occur within pumping stations and/or sumps, it is unlikely that any released material would travel off-site. All tank pumps are located adjacent to their corresponding tank or at the pump manifold next to the office. All tank pumps are located in contained areas.

Location of the material spilled

If a small case discharge were to occur within pumping stations and/or sumps, the spilled material would be contained within close proximity of the pump or sump and inside secondary containment.

Material discharged

If a small case discharge were to occur within pumping stations and/or sumps, the released material would be gasoline, diesel oil, transmix, ethanol or additive.

Weather or aquatic conditions

If a small case discharge were to occur within pumping stations and/or sumps, the released material would not be affected by weather or aquatic conditions due to the location of the pumps and sumps inside secondary containment.

Available remediation equipment

A full listing of emergency equipment at this Terminal is provided in Section L.

Probability of a chain reaction of failures

If a small case discharge were to occur within pumping stations and/or sumps, there is little probability of a chain reaction of failures. Each pump is segregated by piping manifolds and block valves.

Direction of spill pathway

If a small case discharge were to occur within pumping stations and/or sumps, released material would likely move in all directions, but would be contained by curbs or dikes.

Oil Storage Tanks

Oil Storage Tanks Small Spill Scenarios

Any leak from an oil storage tank should be of concern. Tanks are inspected for leaks each workday. While any leak would likely be contained in secondary containment, immediate action should be taken upon discovery of a tank leak to correct or isolate the problem.

Age and condition of oil storage tanks

The ages of all tanks may be found in Section H.

Estimate of size of a small case discharge that could occur in this area

If a small case discharge were to occur from the failure of oil storage tanks, the spill would likely be up to 50 barrels (2,100 gallons).

Proximity to downgradient wells, waterways, and drinking water intakes

Please refer to the Vulnerability Analysis/Sensitive Areas portion of this section for well, waterway and water intake information.

The terminal is adjacent to Cooper Creek. There are no known water intakes.

Proximity to fish and wildlife and sensitive environments

Please refer to the Vulnerability Analysis/Sensitive Areas portion of this section for fish and wildlife and sensitive environment information.

The terminal is adjacent to Cooper Creek. There are no identified wetlands or sensitive areas downstream.

Likelihood that the discharge will travel off-site

If a small case discharge were to occur from the failure of oil storage tanks, it is unlikely for any released material to travel off-site. All storage tanks are contained within a dike area that will hold the volume of a small case discharge.

Location of the material spilled

If a small case discharge were to occur from the failure of oil storage tanks, the spilled material would drain into and be contained in the confines of the diked area around the tanks.

Material discharged

If a small case discharge were to occur from the failure of oil storage tanks, the released material would be gasoline, diesel oil, ethanol, transmix, or additive.

Weather or aquatic conditions

If a small case discharge were to occur from the failure of oil storage tanks, the released material would not be affected by weather or aquatic conditions. The diked area around the tanks will hold the volume of a small case discharge.

Available remediation equipment

A full listing of emergency equipment at this Terminal is provided in Section L.

Probability of a chain reaction of failures

If a small case discharge were to occur from the failure of oil storage tanks, there is little probability of a chain reaction of failures. No manifolded tanks exist at this Terminal. The tanks are connected by piping, but they are segregated by piping manifolds and block valves.

Direction of spill pathway

If a small case discharge were to occur from the failure of oil storage tanks, the released material would move in all directions around the tanks, but would be contained within the diked areas.

Vehicle Refueling

Vehicle Refueling Small Spill Scenarios

No vehicle refueling occurs at this Terminal.

Medium Case Discharge

Medium Spill Response Resources

The terminal is a complex facility as described under OPA '90. The EPA medium discharge for this facility is 36,000 gallons.

This is not a designated high volume port area so the required response time is 12 hours.

From 40 CFR 112, Appendix E, the required medium discharge response resources consist of the following:

- Sufficient quantity of containment boom available to arrive within the response times for oil collection and containment and for protection of fish and wildlife and sensitive environments.
- Oil recovery devices with a daily recovery rate equal to 50 percent of the planning volume (18,000 gallons) available within the response times
- Daily oil storage capacity of 36,000 gallons available for recovered oily material.

These resources are available from the medium spill OSROs listed in Section F of this FRP

Medium Spill Scenarios & Factors

A release of this size would result in the same scenarios and factors as described for a small case discharge, with the following exception:

- A spill in the entrance drive could possibly impact soils adjacent to the driveway and could potentially leave the property or enter storm ditches. In the event that a spill occurs in the entrance area, loading should immediately be terminated and no further transports should be allowed to enter Terminal premises. The following areas are to be protected:
 - A storm ditch located at the entrance gate, approximately 50 feet from the loading rack which runs along the edge of the drive.
 - Cooper Creek Lake, southwest of the Terminal.
- A spill in the exit drive could possibly impact soils adjacent to the driveway and could potentially leave the property or enter storm ditches. In the event that a spill occurs in the entrance area, loading should immediately be terminated and no further transports should be allowed to enter Terminal premises. The following areas are to be protected:
 - A storm ditch located at the exit gate, approximately 50 feet from the loading rack which runs along the edge of the drive.
 - Cooper Creek Lake, southwest of the Terminal.

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Worst Case Discharge

Worst Case Discharge Spill Response Resources

The terminal is a complex facility as described under OPA '90.

(b) (7)(F)

This is not a designated high volume port so the required response time is 12 hours for Tier 1 resources, 36 hours for Tier 2 resources, and 60 hours for Tier 3 resources.

(b) (7)(F)

From 40 CFR 112, Appendix E, the required WCD response resources consist of the following:

- The above indicated on-water oil recovery capacity in barrels per day to arrive on-scene within the time for each response tier.
- Shoreline recovery capacity as shown above.
- Firefighting resources.
- Sufficient quantities of boom for the protection of fish and wildlife and sensitive environments within the area potentially impacted by a worst case discharge from the facility.
- Daily oil storage capacity equal to twice on-water recovery capacity noted above.

As indicated in Section F of this FRP, all contracted WCD OSROs are USCG-classified indicating they have adequate resources for responding to a WCD for the designated USCG COTP location.

WCD Scenarios

There are no permanently manifolded tanks at this Terminal.

(b) (7)(F)

(b) (7)(F)

In the event of a catastrophic failure of the largest tank at this facility, the containment dikes could be breached due to product surge, allowing a portion of this volume to escape. Due to the terrain, the uncontained volume would likely flow in a southwest direction to Cooper Creek. Cooper Creek is approximately 200 feet from Tank 30-5. Secondary containment drainage discharge is through a NPDES permitted discharge point into Cooper Creek. The product flow continues along Cooper Creek to Cooper Creek Lake, located approximately 1.5 miles from the Terminal.

No vehicular traffic will be allowed in areas of vapors. Only trained personnel will enter the contaminated area for the recovery process.

Whenever petroleum products are released, the potential for fire and/or explosion exists.

Released product is likely to be in four areas:

- Remaining in the tank
- Contained within the tank dike
- On land, but outside the containment area
- On water, or in a pathway that could contaminate water with continued inclement weather

In the event of a spill of this size, the Terminal Manager would be notified, the Terminal Response Team would be alerted, and this Plan would be activated.

The Terminal Response Team would begin control and containment efforts.

The OSRO contractor(s) would be called to contain, recover, and clean up.

Product Remaining in the tank

Product remaining in the affected tank should be transferred to other available tankage as soon as it is safe to do so. It is likely that clean-up of product in the tank dike will be necessary before it is deemed safe to transfer. Potential means to transfer are:

- Portable Pumps and Hoses
- Vacuum Trucks
- Terminal Product Pumps

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Product Contained within the tank dike

Steps should be taken as soon as possible to repair/reinforce the breached area of the dike to restrict the amount of product escaping the property.

When safe to do so, boom and/or earth moving equipment can be utilized to repair the dike.

Product remaining within the dike should be recovered and stored in any available tankage, at either the Terminal or in portable tankage as soon as it is safe to do so. This can be accomplished by:

- Portable Pumps and Hoses
- Vacuum Trucks
- Skimmers

If the release occurs in inclement weather, water may be present under the product in the tank dike. In this event, see Section C, which outlines considerations for oil on water.

Product On land, but outside the containment area

Initial actions should center on attempting to contain the released product within as limited an area as possible, and avoid introducing the product to a waterway.

Product On water, or in a pathway that could contaminate water with continued inclement weather

Boom is likely to be the best available method to control product in this area. Begin boom deployment to protect critical and sensitive areas and to contain product.

Product

Planning Factors for the Worst Case Discharge

(b) (7)(F)

Proximity to downgradient wells, waterways, and drinking water intakes

The terminal is adjacent to Cooper Creek. There are no known water intakes. Please refer to the Vulnerability Analysis/Sensitive Areas portion of this section for well, waterway and water intake information.

Please refer to the Vulnerability Analysis/Sensitive Areas portion of this section for more well, waterway and water intake information.

Proximity to fish and wildlife and sensitive environments

The terminal is adjacent to Cooper Creek. There are no identified wetlands or sensitive areas downstream. Please refer to the Vulnerability Analysis/Sensitive Areas portion of this section for fish and wildlife and sensitive environment information.

Please refer to the Vulnerability Analysis/Sensitive Areas portion of this section for fish and wildlife and sensitive environment information.

Likelihood that the discharge will travel off-site

In the event of a WCD, it's likely that the release would travel off site.

Location of the material spilled

Into secondary containment and then in drainage to Cooper Creek which is adjacent to the terminal.

Material discharged

The Worst Case Discharge material is gasoline.

Weather or aquatic conditions

Any rain event would likely exacerbate the release.

Available remediation equipment

A full listing of emergency equipment at this Terminal is provided in Section L.

A full listing of emergency equipment at this Terminal is provided in Section L.

Probability of a chain reaction of failures

In the event of a WCD, the probability of a chain reaction of failures is quite possible.

Direction of spill pathway

Drainage from the terminal flows to the SSW in Cooper Creek.

Potential for Other Equipment Failure, Type & Control

SOURCE	PRODUCT SERVICE	CAPACITY (GALS)	DIMENSIONS DIA. X HGT.	(b) (7)(F)	SECONDARY CONTAINMENT
Drum Storage	Petroleum Products	55	Drum		None
Tanker Truck Loading Rack	Gasoline, Ethanol, Distillates, Additive, Dye, Transmix	9,000	Tank Truck		Curbing, Ramped Pad, O/W Separator
Tanker Truck Unloading	Additive (AA-1-2) Additive (AA-3-1)	9,000 9,000	Tank Truck		Dike – CA2 Dike CA-3
Tanker Truck Unloading	Ethanol	8,500	Tank Truck		Curbing, Ramped Pad, O/W Separator
Drum	Conductivity Additive	35	Drum		Concrete Pad (Pump Area)
Vapor Control System	All Products	500	N/A		Dike – concrete
				(b) (7)(F)	

For direction of flow in the event of an incident see the Site & Flow Diagram in Section G.

Any oil-filled operational (electrical) equipment located on the property resides in a location where any release/discharge would not likely spread beyond the property boundaries before clean-up occurs. Oil-filled operational (electrical) equipment is inspected for failure and/or discharge during the daily walk-around and any identified released/discharged oil would be promptly addressed.

- 55-gallon drums containing petroleum products that are used at the facility are stored in the north western portion of the site. Drums are stored on an undiked concrete pad (former refrigeration unit location) and others are stored on the north side of the VRU on gravel surface. A rupture or leak of one of these drums would flow to a drainage pathway leading to a concrete water spillway at the northwest corner of the site.
- Aboveground piping is located in the graveled manifold area located directly south of the loading rack and leading to bulk storage tanks. Above ground piping is also located in the graveled area leading from the VRU to the bulk storage tanks. A rupture or leak from this piping would flow to a drainage pathway leading to a concrete water spill way at the northwest corner of the site.
- There are no large, pad mounted electrical transformers containing oil at the facility.
- The most likely source of equipment failure can be found at the tanker truck loading area. Overfill of a tank truck, at the loading rack could occur due to equipment malfunction or human error, resulting in ruptures or leaks of the truck. Major leaks can be caused from improperly connected loading arms or equipment malfunction. A spill associated with the loading rack or unloading area is most likely a result of a bad connection between the truck and arms/pipes or a design or equipment malfunction of the arms and piping.

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- When loading a tanker truck at the load rack, the pump rate is a maximum of 600 gallons per minute, when unloading the pump rate is 400 gallons per minute. The maximum capacity of a tank truck is 9,000 gallons. A major rupture of a tank truck could release the entire contents almost immediately. However, most tank trucks have multiple compartments varying from 1,000 – 4,000 gallons per compartment. Drainage would be directed to an oil/water separator at the loading rack. All trucks that load at this terminal are equipped with sensors to prevent overfill. There is also an emergency shut off at each end of the rack to stop the flow of product. Signs are posted to remind drivers of proper loading techniques.
- Should a major rupture of a tank truck on-site located outside of the loading area occur, such as unloading operations at the additive tanks or ethanol off-load, curbing and slope would direct flow to a drainage pathway leading to a concrete water spill way at the northwest corner of the site.

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ARRANGEMENT WITH STATE AND LOCAL AGENCIES

MPC has made arrangements with various state and local agencies to coordinate emergency services. Contact names and phone numbers of emergency response agencies are listed in Section B.

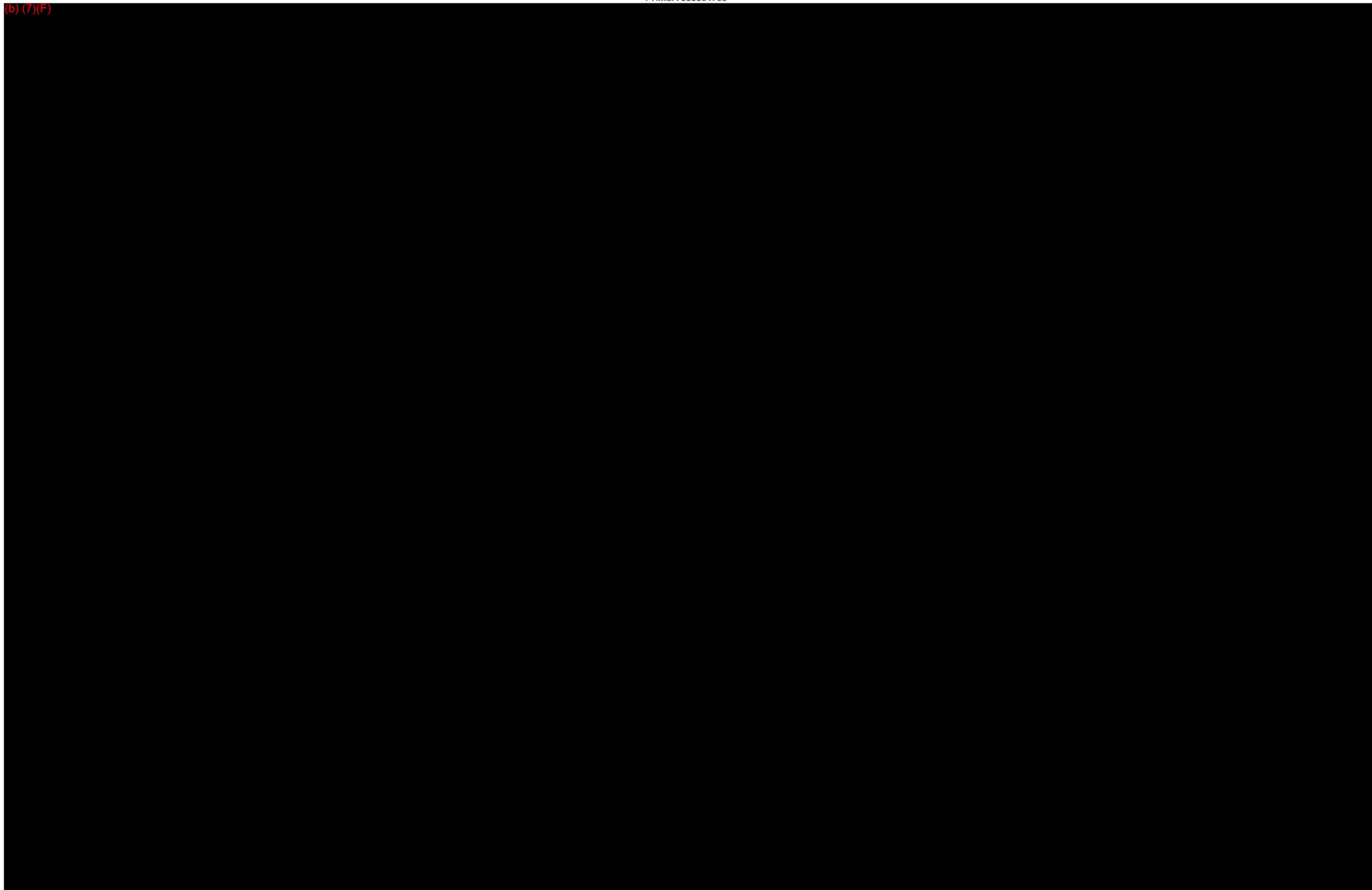
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COLUMBUS VULNERABILITY ANALYSIS DIAGRAM

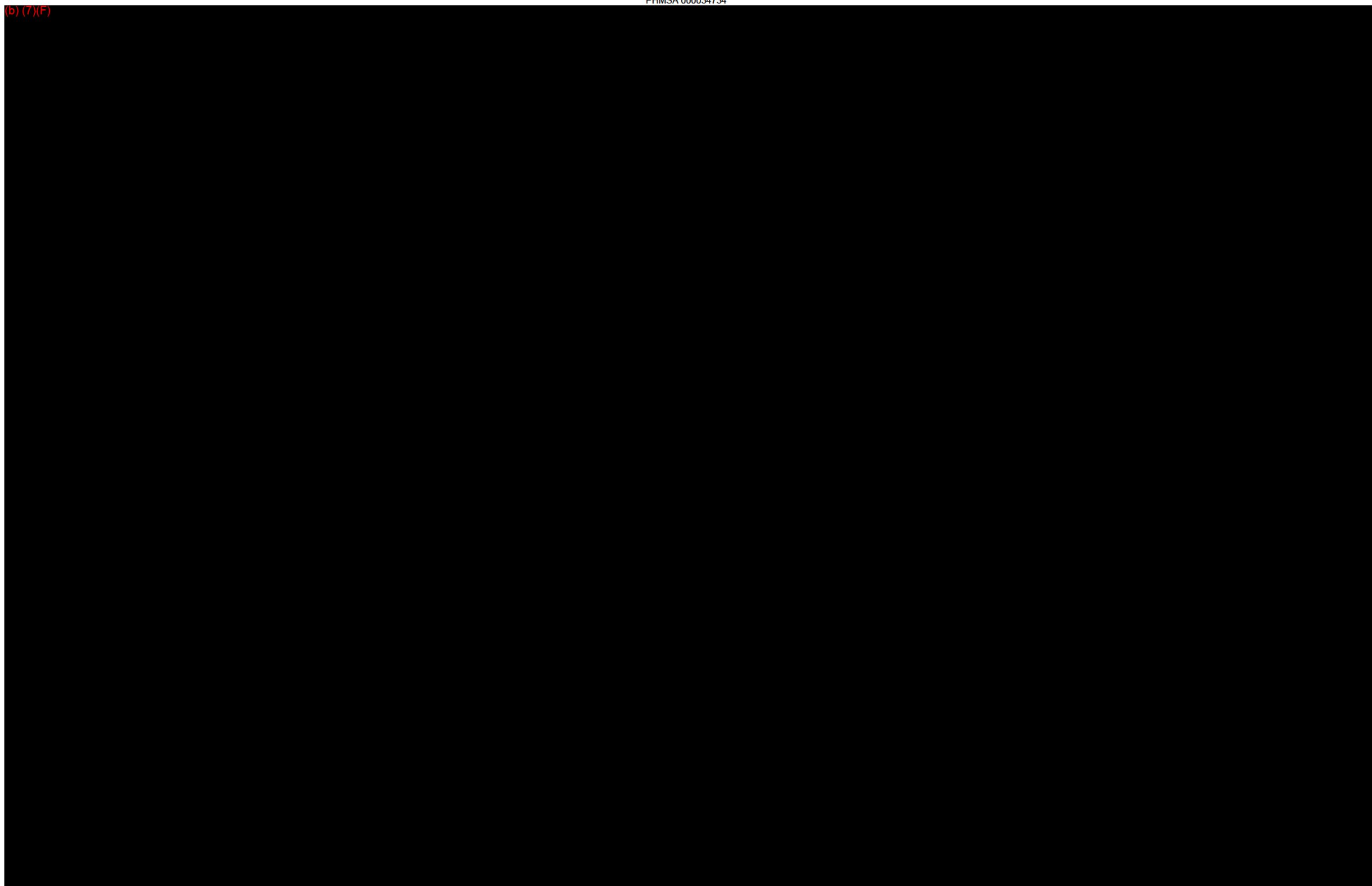
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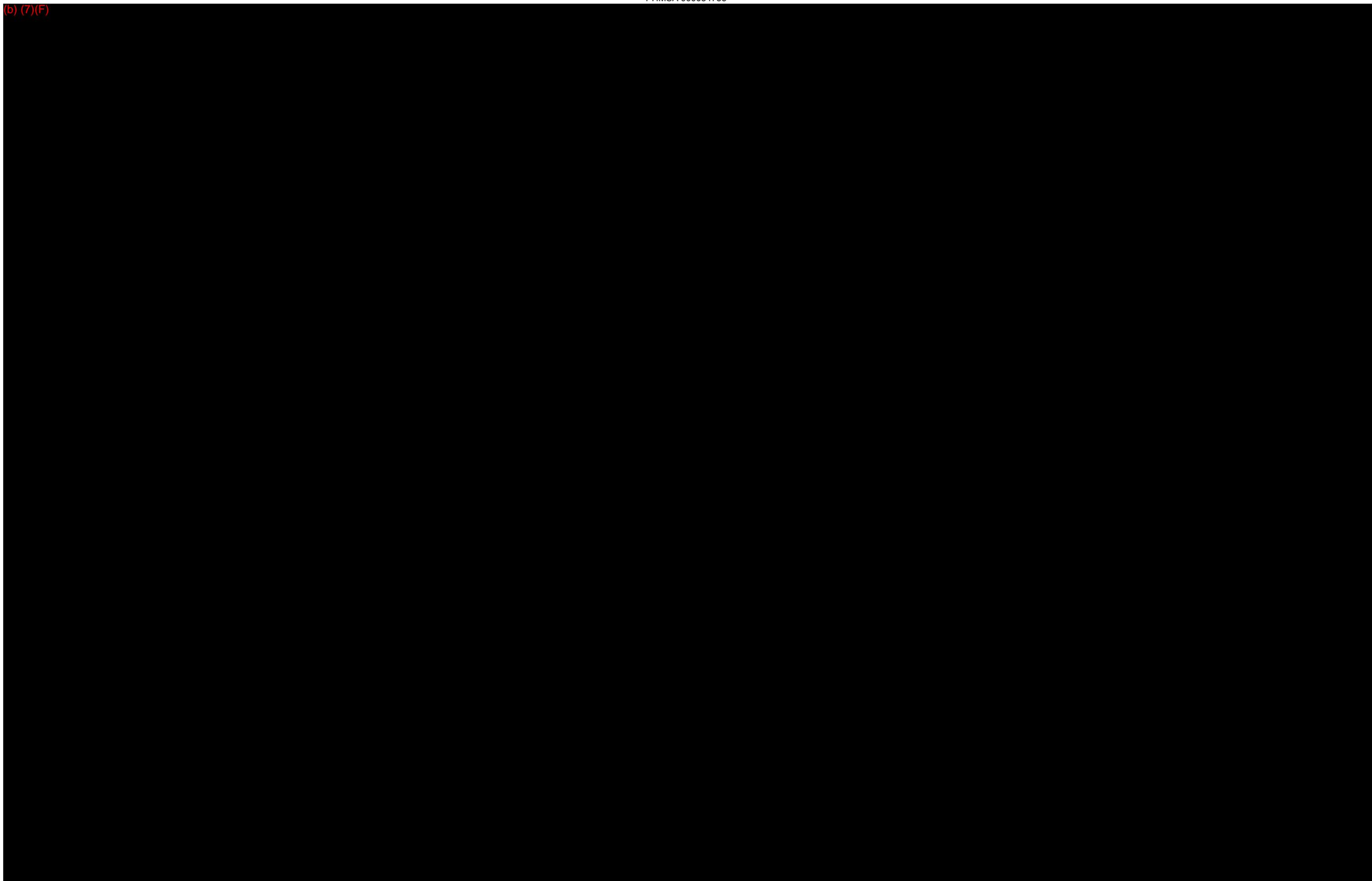
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OSHA Emergency Action Plan

This plan is meant to meet the requirements of the written emergency action plan in 29 CFR 1910.38 *Emergency action plan*.

Procedures for reporting a fire or other emergency - In the event of an emergency, the person observing the emergency shall communicate immediately with other persons at the terminal and alert them of the incident. The Terminal Manager or senior person present at the terminal shall take charge of responding to the incident. The Emergency Action Guides in the FRP shall serve as the basis for taking action in the event of a fire/explosion, product release, tornado or heavy weather, or security incident. There is also a guide for a General Emergency which provides guidance for any unexpected type of emergencies.

Procedures for emergency evacuation - The Terminal Manager or senior person present at the terminal shall determine the need for an evacuation and order an evacuation, if determined necessary. Evacuation routes are shown in the FRP Evacuation Plan Diagram. In addition, each building has a diagram showing exit routes. Exit signage within the normally occupied indicates exits within each building. If an evacuation is ordered, employees shall proceed to the designated mustering area.

Procedures to be followed by employees who remain to operate critical plant operations before they evacuate – There are no critical operations that would require any employees to remain at the terminal in the event of an evacuation.

Procedures to account for all employees after evacuation – The Terminal Manager or senior person present will take a head count at the mustering location to ensure all employees have evacuated.

Procedures to be followed by employees performing rescue or medical duties – The Facility Manager at each location shall conduct an assessment to determine their response capabilities.

If the following criteria are not met, all employees shall be first aid and CPR trained:

- If responder is located greater than 10 miles from location or;
- If the responder station is not manned at all times during a 24-hour, 7 days/week period.
- Please note: Employees trained in first aid and CPR shall provide medical assistance on a voluntary basis and only if they feel proficient in the treatment to be administered. The procedures established in the Bloodborne Pathogen Control Policy (TTMHES401) shall be followed.

AED's – For further detailed information see MPC HES Standard HLT-2023-DN – Automatic External Defibrillator and TTMHES402 – First Aid/CPR.

Name of employee who can be contacted for additional information on the emergency action plan – The Terminal Manager can be contacted by any employee who needs more information.

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Employee alarm system – If the terminal has 10 or less employees, word of mouth, cell phones, or intrinsically safe radios will be used to communicate the nature of the emergency and the required actions. This satisfies the requirements of 29 CFR 1910.165(d) for an employee alarm system.

Training – If there are 10 or less employees at the terminal, the Terminal Manager or senior person present at the terminal shall train all personnel as scheduled below in how to conduct a safe and orderly evacuation.

Training Schedule – Employees shall be trained on this plan when the employee is first assigned to the terminal, when any employee's responsibilities under the plan change, when the plan changes, and at least annually.

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EVACUATION PLAN

In the event Terminal evacuation becomes necessary, the following Plan should be followed to ensure employee/visitor safety. Announcement of an evacuation will be made by the Terminal Manager or Designated Alternate.

It shall be the Terminal Manager or Designated Alternate's responsibility to train each employee annually on the proper evacuation procedures.

The Terminal will cooperate with local officials during any evacuation of the area. In the event of a community evacuation, the Columbus, GA Fire Department will be in control of the evacuation.

The following safety authorities shall be notified:

- 911 Central Dispatch
- Columbus Fire Department
- Columbus Police Department
- Muscogee County Sheriff's Department

The local public safety authorities may need to establish traffic control at:

- Intersection of Miller Road and Hodges Drive
- Intersection of Miller Road and Bishop Drive

Spill equipment and Fire Department staging areas are:

- The primary staging area will be established east of the Marathon Petroleum Company office building. The primary staging area is located inside the fenced area. If conditions exist that will not permit this area, relocating the staging area to the secondary staging area will occur.
- The alternate site for the staging area is located across Miller Road to the east about 1/4 of a mile

Evacuation centers are:

- Parking lot west of Terminal office building
- Florida Rock and Tank Lines

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Medical treatment is available at:

Medical Service, Inc.-Ambulance
706/563-2121

Medical Center Hospital
710 Center Street
Columbus, GA
706/571-1000

St. Francis Hospital
2122 Manchester Expressway
Columbus, GA
706/596-4000

Doctor's Hospital
616 19th Street
Columbus, GA
706/494-4262

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TERMINAL OFFICE BUILDING(S)

If immediate evacuation of the office area becomes necessary, use the Main Terminal office building door if possible, the alternate would be the door by the drivers restroom. Everyone should go to the mustering point, which is located in the employee parking lot to be accounted for and receive any additional information that may be necessary for their safety.

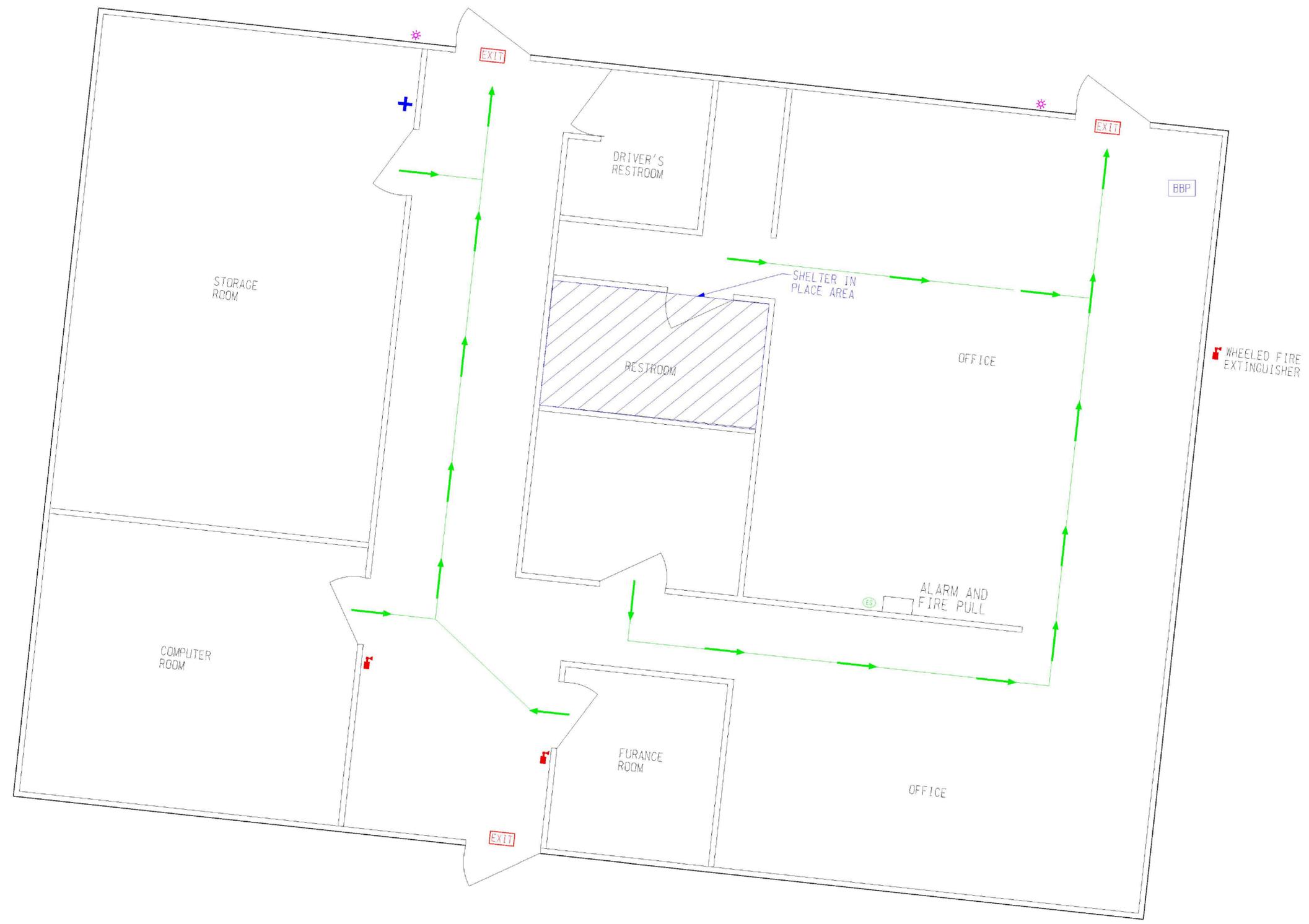
The Terminal Manager or the Designated Alternate will be responsible for taking the head count and administering instructions.

Following this write up is a diagram of the Terminal Office.

The Evacuation Plan Terminal Office Diagram details:

- Preferred exit doors, routes to exit the building
- Fire extinguishers
- First aid kits
- Blood borne pathogen kits
- Exit signage (illuminated or not)
- Emergency lighting
- Eye shower stations, if applicable
- Emergency showers, if applicable
- Immediate mustering point(s) outside of building, either written directions or marked on diagram
- Shelter in place area(s)

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- LEGEND**
- FIRE EXTINGUISHER
 - LIGHT OR LIGHT POLE
 - EMERGENCY STOP
 - ILLUMINATED EXIT SIGN
 - FIRST AID KIT
 - BLOOD BORNE PATHOGEN
 - EVACUATION ROUTES

WHEELED FIRE EXTINGUISHER

NO	DATE	DATE	REVISIONS	DSNR.
1	5/20/02	TLP	ADDED BLOOD BORNE PATHOGEN KIT	

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**EVACUATION PLAN
TERMINAL OFFICE**

COLUMBUS, GA TERMINAL

SCALE	NONE
DATE	10-04-2000
DRAFTER	S.T. LAFFERTY
DESIGNER	N/A
AFE	N/A
CORE NO	083-01085-01-FRP
UNIT-DWG-SHT-TYPE	
DWG NO	083-01085-01-FRP



ENTIRE TERMINAL PROPERTY

If evacuation of the entire Terminal grounds becomes necessary, employees working outside the office will be notified via a verbal announcement to immediately start taking the necessary steps in shutting the Terminal down. Personnel should immediately discontinue their current activity and report to the on-site mustering point for accountability and further instructions.

In the case of a complete evacuation of the Terminal property, the off-site mustering point is located at the Florida Rock and Tank Line Office.

In case of severe weather the Terminal's designated "shelter in place" location is the Terminal office building.

The Terminal Manager or the Designated Alternate will be responsible for taking the head count and administering instructions.

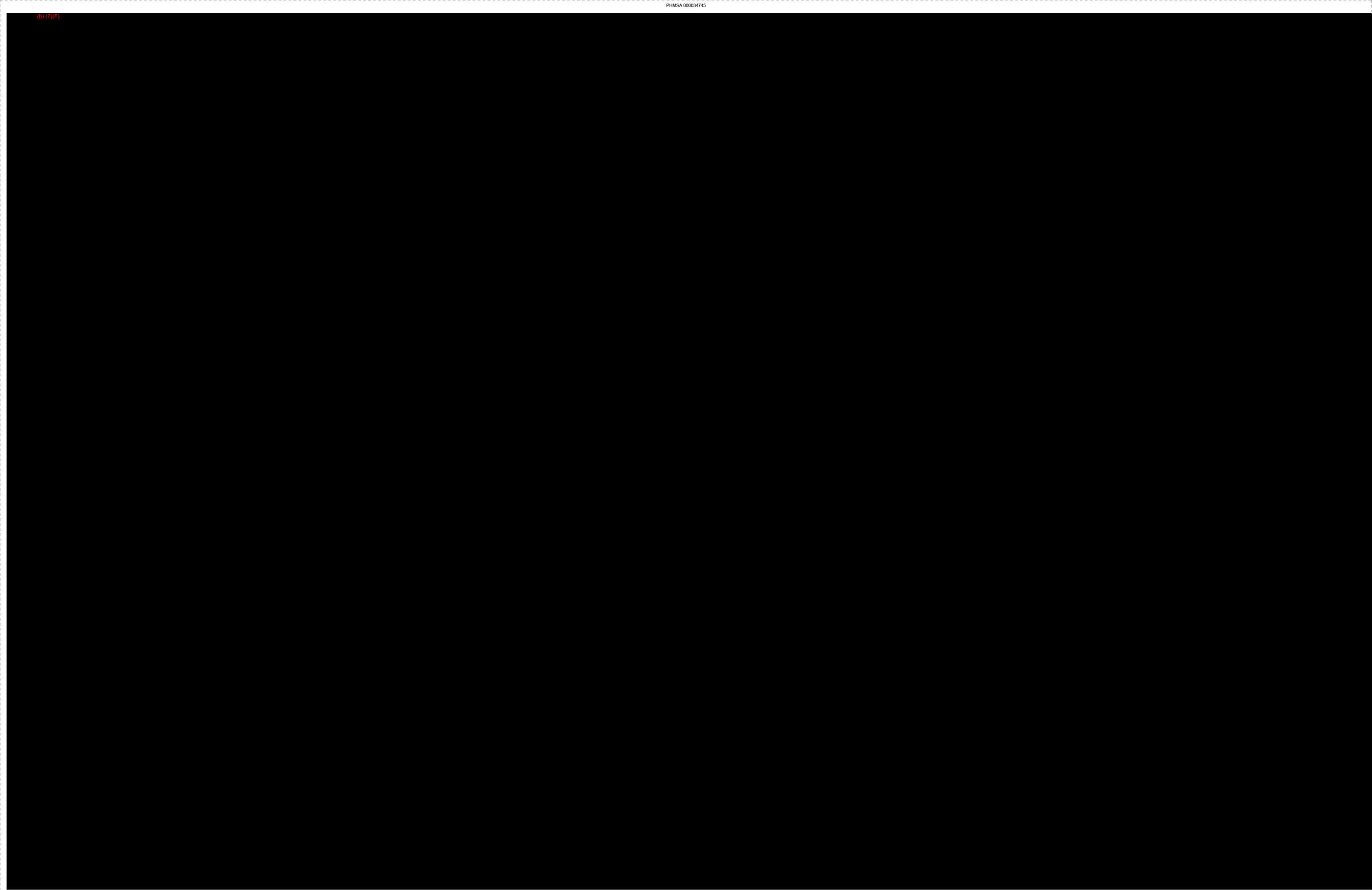
Following this write up is a diagram of the Terminal.

The Evacuation Plan Terminal Site Diagram details:

- Pedestrian routes within the tank farm(s)
- Entire Terminal Evacuation Mustering Point
- Shelter in place location(s)
- External communications, speakers, sirens or horns, if applicable
- Written directions to off site evacuation point
- Alternate Command Post
- Transport safe haven, if applicable

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MPC**Columbus, GA LP Terminal****EVACUATION PLAN****SUMMARY SHEET**

- | | | |
|------|--|--|
| I. | Sound fire alarm. | By a verbal announcement |
| II. | Call Fire/Police Dept. | 911 – Central Dispatch, if applicable
Columbus Fire Department, Columbus
Police Department |
| III. | Extinguish fire if safe to do so. | (If fire is out of control or too dangerous,
wait at a safe distance for help to arrive.) |
| IV. | Evacuate employees and personnel vehicles. | |

THE FOLLOWING WILL BE ACCOMPLISHED BY TERMINAL PERSONNEL ONLY!

- | | |
|-------|--|
| V. | Open gates for emergency vehicles. |
| VI. | Close piping valves. |
| VII. | Essential Personnel, necessary to interface with the Fire Department, move away a safe distance to await Fire Department. |
| VIII. | Non Essential Personnel, go to the Offsite Mustering Point: |

Florida Rock and Terminal Tank Line Office
5214 Miller Road
Columbus, GA 31909
706/563-5671

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Evacuation Plan Checklist

Evacuation Plans - Columbus, GA LP

Terminal Evacuation Checklist	Priority	< 15 min	< 1 hr	< 24 hrs	> 24 hrs	Responsible Person	Completed
Power/Electrical							
Turn off Local Power (Main Disconnect) - if needed or required, Install LOTO (Safety)	1		X				
Turn Power off to from the Main Grid to the terminal - Power Company - Install LOTO (Safety)				X			
Tanks/Tank Farm							
Shut down pipeline, rail, and truck receipts	1		X				
Close Tank Valves - leave PRV's open				X			
Dike drains on horizontal tank containment - open to prevent floating				X			
Transfer Product to maintain safe inventory levels				X	X		
Fill additive tanks, if necessary				X	X		
Fuel Above Ground Re-fuel tanks, Empty Under Ground Re-fuel tanks							
Fuel Heating Oil tanks (Asphalt)							
Tank gauges - pull? Discuss with Area Mngt					X		
Pull pumps - Discuss with Area Mngt					X		
Shut down emulsion mill (Asphalt)							
Shut down polymer system (Asphalt)							
Shut down hot water system (Asphalt)							
Shut down cross linker system (Asphalt)							
Disconnect power to Cathodic Protection			X				
Tie down any tanks not in their own containment or not anchored					X		
Tie empty milk/soda containers to valves (ease in locating when flooded)					X		
Drain dike containment water, if practical				X			
Intermediate dikes - open				X			

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Evacuation Plans - Columbus, GA LP

Terminal Evacuation Checklist	Priority	< 15 min	< 1 hr	< 24 hrs	> 24 hrs	Responsible Person	Completed
Outfall Valves - ensure main outfalls are closed	1		X				
Rail							
Containment at Rail Site - are there valves to close? What to do?							
Rail Cars empty or full? - what to do							
Rail Cars offloading - shut down and disconnect							
Move the railcars off site							
Office/Computer Systems							
Raise computer equipment to higher ground				X			
Records - move to higher ground					X		
Perform back-ups of computer systems, as applicable				X			
Shut down computer systems (TAS, Lenel, Security Cameras, if applicable)				X			
Truck Rack							
Turn off Rack Sales - contact SD&P to make notification	1		X				
Disable Fire Suppression System and close valves - Foam tank, dry chemical			X				
Plug rack trench drains/offload areas				X			
Oil Water Separator - pump out oil side, close valves, install sewer plugs					X		
WAT/Holding Tank - Close valves, then on , Above Ground, fill up, Below Ground, leave alone					X		
Meter Preset boards - pull					X		
Scales (Asphalt) - leave in place							
Vapor Recovery/Combustor Units - Terminal							
Shut down the VRU/VCU - push the E-stop button	1		X				
Hot Oil Heaters (Asphalt) - shutdown and isolate hot oil valves							
Shut down Boilers (Asphalt)	1						
Shut down steam system (Asphalt)	1						

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Evacuation Plans - Columbus, GA LP

Terminal Evacuation Checklist	Priority	< 15 min	< 1 hr	< 24 hrs	> 24 hrs	Responsible Person	Completed
Shut off assist/enrichment gas, if applicable				X			
Facility - Security							
Secure and lock the facility - gates, offices, warehouses, etc.	1		X				
Security cameras need disconnected? Considered but not applicable							
Facility - Misc.							
Frac Tanks/Roll Offs - move to higher ground					X		
Ensure storm water drains are clear of debris				X			
Secure loose equipment, drums, etc that are stored outside (Waste Storage)				X			
Move electronic testing room equipment to higher ground					X		
Move polymer boxes to safe and secure spot							
Move terminal trucks, equipment to higher ground				X			
Spill Response Equipment - location - will it be accessible?							
Warehouse - clean out if time permits					X		
Environmental Issues							
Agency notification needed? (filling tanks with river water, dike water)					X		
POTW notifications needed?					X		
Post Evacuation Activities (pre planning)							
Put Logistics, Contractors, Equipment on standby					X		

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**MPC Columbus, GA Light Products Terminal
Evacuation Plan Considerations**

No.	EPA Evacuation Plan Considerations	MPC Terminal Responses
1.	Location of stored materials	Primary material stored in tankage is gasoline, ethanol, and light petroleum products such as diesel fuel. Evacuation routes are away from the storage tanks toward Miller Road.
2.	Hazard imposed by spilled material	Gasoline and ethanol are flammable. Diesel is combustible. All are hazardous from inhalation, contact, and ingestion. Evacuation routes are away from the storage tanks.
3.	Spill flow direction	Spills would flow to the west and then SSW in Cooper Creek.
4.	Prevailing wind direction and speed	Winds are from the ENE Nov - Feb, from the NW mar - Apr, from the WNW May - June, from the S Jul- Aug, and from the E Sep - Oct, all between 6-8 mph.
5.	Water currents, tides, and wave conditions (as applicable)	Cooper Creek, a small creek that passes adjacent to the terminal, is not considered a factor in any evacuation.
6.	Arrival route of emergency response equipment and personnel	Emergency personnel and vehicles would arrive on the north side of the terminal at the entrance gate on Miller Road. Personnel would evacuate out the gate onto Miller Road.
7.	Evacuation routes	Evacuation routes are towards the north through the main gate and are indicated on The Evacuation Diagram.
8.	Alternative routes of evacuation	In an emergency, terminal personnel could also evacuate through several gates located around the terminal.
9.	Transportation of injured personnel to nearest emergency facility	Local medical facilities are indicated on page E-3.
10.	Location of alarm/notification systems	A description of the terminal alarm and notification system is found on page E-11.
11.	The need for a centralized check-in area for evacuation validation (roll call)	An initial evacuation location has been established in the parking lot on the west side of the building. A secondary evacuation location has been established at the Florida Rock & Tank Lines approximately ¼ mile east of the terminal on the north side of Miller Road.
12.	Selection of a mitigation command center	Initially the terminal office, and if evacuation is necessary, then at Florida Rock & Tank Lines.
13.	Location of shelter at the facility as an alternative to evacuation	The terminal office building has been established as the designated "Shelter-in-place" location.

NOTE: In the event of a community evacuation, the Columbus, GA Fire Department will be in control of the evacuation.

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Section F: Response Support - Oil Spill Removal Organizations

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OIL SPILL REMOVAL ORGANIZATIONS (OSROs)

OSRO Contracts, Audits, and Site Familiarization Visits

MPC has developed an OSRO Program which includes written contracts with OSROs, MPC audits of OSRO facilities, and periodically inviting OSRO personnel for site familiarization visits.

Contracts - MPC has executed Environmental Services Contracts with all OSROs that MPC utilizes and lists in the FRP. MPC has written contracts with all spill response contractors and requires certain levels of insurance, personnel training, equipment maintenance, and safety performance. Prior to being accepted as a spill response contractor, each contractor must complete a safety questionnaire and be approved before a contract can be instituted. A copy of the signature page of the WCD OSRO for the terminal is located later in this section. (See TOC for location.)

Audits - MPC has an ongoing audit program in which a MPC employee periodically visits and inspects the locations of all spill response contractors cited in a MPC FRP. This audit includes an on-site inspection of the contractor's facility and includes documenting the available equipment, and ensuring the equipment is serviced and maintained properly. MPC has developed an audit form based on the forms used by the USCG in auditing OSROs. An audit report is generated from each visit which includes personnel training, exercises conducted, contracts, spill response equipment, firefighting equipment, support equipment, personal protective equipment, and transportation equipment. The MPC evaluator makes a subjective determination of acceptable qualification after each audit. Spill response contractors are audited when they first contract with MPC in order to qualify, and then are audited at approximate 2-3 year intervals thereafter. Whenever there is a change in ownership, contractors are normally again audited to ensure that an acceptable level of readiness is being maintained and equipment is acceptable. A completed audit form for the small (AMPD) responder is located later in this section. (See TOC for location.) Note that this completed audit form includes an equipment list for the small spill OSRO that would be available for a small spill to augment the terminal's spill response equipment.

Site Familiarization Visits - MPC Terminal Managers are encouraged to periodically invite listed OSROs to visit the terminal for site familiarization. MPC Form 850 OSRO Site Familiarization Checklist can be used to document the OSRO site familiarization visit and provides guidelines for the information to be reviewed. A copy of MPC Form 850 is located later in this section (See TOC for location.). At the discretion of the MPC Terminal Manager, the small spill OSRO or the WCD OSRO should be invited. OSRO site familiarization visits should be scheduled at least once every two years.

MPC also evaluates the performance of contractors and their equipment during drills and actual responses. If MPC deems any contractor unacceptable, or equipment is not acceptable, MPC will no longer cite the contractor in an FRP, or use that contractor for response.

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Terminal OSRO Contractors

The terminal does maintain some spill response equipment for immediate response to a small spill. MPC terminals rely on OSROs for all additional equipment.

The OSROs that will initially be called to respond to a small (AMPD), medium (MMPD), and WCD spill are listed on the following page. In addition, secondary OSROs are listed that may be called upon for additional support. The response times and the USCG OSRO classifications, if so classified, are also listed in the following pages.

Procedures for Ensuring Maintenance of Non-USCG Classified Contract Spill Responders

MPC has taken steps to ensure that all designated spill response contractors will provide well-maintained and properly serviced equipment in a timely fashion. MPC qualifies spill response contractors by both a written contract and an on-site audit.

MPC has written contracts with all spill response contractors and requires certain levels of insurance, personnel training, equipment maintenance, and safety performance. Prior to being accepted as a spill response contractor, each contractor must complete a safety questionnaire and be approved before a contract can be instituted. After being qualified, an on-site audit of the contractor's facility is performed.

MPC has an ongoing audit program in which a MPC employee periodically visits and inspects the locations of all spill response contractors cited in a MPC FRP. This audit includes an on-site inspection of the contractor's facility and includes documenting the equipment available and ensuring the equipment is serviced and maintained properly. In performing the audits, MPC has developed an audit form based on the audit forms used by the USCG in auditing OSROs. An audit report is generated from each visit which includes personnel training, exercises conducted, contracts, spill response equipment, firefighting equipment, support equipment, personal protective equipment, and transportation equipment. The MPC evaluator makes a subjective determination of acceptable qualification after each audit. Spill response contractors are audited when they first contract with MPC in order to qualify, and then are audited at approximate 2 to 3 year intervals thereafter. Whenever there is a change in ownership, contractors are normally again audited to ensure that an acceptable level of readiness is being maintained and equipment is acceptable.

MPC also evaluates the performance of contractors and their equipment during drills and actual responses. If MPC deems any contractor or their equipment unacceptable, MPC will no longer cite the contractor in an FRP

Terminal Equipment

The terminal response equipment list can be found in Section L (as noted in the Regulatory Cross Reference Index).

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TERMINAL OSROs & RESPONSE TIMES

OSRO	SPILL SIZE ADDRESSED	RESPONSE TIME
KAM, Inc. 2723 Manchester Road Columbus, GA 706/324-5765 or 706/324-5766	Small	1 hour
SWS 5850 Jacaranda Drive Atlanta, GA 800/852-8878	Medium	3 hours
HEPACO, Inc. 4745 Hugh Howell Road Tucker, GA 800/888-7689	Medium	4 hours
SWS 16 Foundation Drive Savannah, GA 800/852-8878 or 912/966-0686	Worst case	7 hours
SWS 1619 Moylan Road Panama City Beach, FL 800/852-8878	Worst case	8 hours
U.S. Environmental 2809 E. Judge Perez Drive Meraux, LA 888/279-9930	Worst case backup	12 hours

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OSRO Certifications (USCG OSRO Classifications)

The Worst Case Discharge (WCD) OSRO and additional support OSROs have USCG Classifications from the indicated Captain of the Port (COTP) zone. The bolded OSRO is the primary WCD responder.

SWS**Savannah, GA****912/966-0686****Rivers/Canals: MM, W1, W2, W3; Inland: MM, W1, W2, W3****SWS**

Panama City Beach, FL / Atlanta, GA

800/852-8878

Rivers MM, W1, W2, W3; Inland MM, W1, W2, W3

HEPACO, Inc.

Tucker, GA

800/888-7689

River/Canal MM; Inland MM

ADDITIONAL CONTRACTED HELP

Following is a partial listing of General Contractors that may be called for additional support.

Emergency Work Orders and Purchase Orders are available to the Terminal Manager.

ADDITIONAL RESPONSE TRAINING

In the event of a release incident, MPC will ensure that response personnel are adequately trained to respond to the incident. Both MPC and contracted response personnel are presently trained to the requirements of OSHA HAZWOPER Standard, 29 CFR 1910.120(q).

In addition, when a release incident occurs, MPC and MPC response contractors will perform a site hazard assessment and site characterization and develop a site-specific Health and Safety Plan (HASP) outlining specific site hazards and the methods by which workers can protect themselves from those hazards. The HASP will be used to provide training to response personnel prior to undertaking any response activities. The HASP will be updated as needed and response personnel will be trained as the incident develops.

In the event that untrained workers must be hired, MPC will work with the response contractors to qualify workers and develop and present a training program acceptable to the U.S. Coast Guard, EPA, and OSHA. In the event volunteer or casual day laborers are employed they will also have to meet the OSHA requirements in 29 CFR 1910.120.

TERMINAL PLANNING VOLUMES

Discharge volumes to be addressed at this facility are as follows:

SPILL SIZE	AMOUNT IN GALLONS	AMOUNT IN BARRELS
Small Spill (EPA)	2,100	50
Medium Spill (EPA)	36 000	858

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RESPONSE SUPPORT**AVIATION**

Total Flight
Metro Airport
Columbus, GA
706/324-2453

Advance International, Inc.
392 Flight Line Avenue
Macon, GA
478/788-1200

PORTABLE HOUSING/OFFICE

Action Portable Buildings
3427 Veterans Pkwy.
Columbus, GA
706/322-6607

Banner Buildings
4011 Warm Springs Road
Columbus, GA
706/568-0500

POTABLE WATER

Buck Ice & Coal Company
2400 12th Avenue
Columbus, GA
706/322-5451

Georgia Mountain Water
109 Westside Drive
Lagrange, GA
800/277-9283

SANITARY FACILITIES

Phoenix Rental Center, Inc.
1306 14th Street
Phoenix City, AL
334/298-9900

Environmental Partners
2015 Veterans Pkwy.
Columbus, GA
706/323-3660

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FUEL

Crown Central Petroleum Corporation
4840 Miller Road
Columbus, GA
706/561-0016

Fletcher Oil Company, Inc.
520 6th Street
Columbus, GA
706/327-3297

VOLUNTEERS

MPC will not hire and/or train volunteers for work on a spill response incident. Instead, MPC will refer volunteers to appropriate state and/or local agencies or organizations that are set up to handle volunteers.

USCG & NAVY RESOURCES

The USCG and Navy also have stockpiles of equipment that are generally available to the private sector after sources of equipment provided by private contractors have been exhausted. The USCG stores material in Mobile, Alabama, Ft. Dix, New Jersey, and Hamilton Field, California. The Navy maintains equipment in Stockton, California and Williamsburg, Virginia. The Navy also has salvage equipment. Requests for federal equipment can be expedited when made through the Federal On-Scene Coordinator.

Form 850 (OSRO Site Familiarization Checklist)

Terminal :

Columbus Light Products

Date :

Contractor: _____

06/00

Items to be Reviewed:		
	1.	Review the Terminal's FRP Action Plan.
	2.	Review key personnel and contacts for both the Terminal and Contractor. Note any personnel changes for both parties.
	3.	Review Contractor's regular hour, 24-hour emergency, and Terminal's telephone numbers to assure that the correct numbers are listed.
	4.	Discuss response time of Contractor from his location to the Terminal. Typical response time from initial call to arrival on site is _____ minutes.
	5.	Discuss contact individuals (<i>i.e.</i> , Incident Commander) when Contractor arrives on site.
	6.	Discuss the Contractor's primary and secondary routes to the Terminal and ingress and egress inside the Terminal.
	7.	Review the locations identified as staging areas and command centers for the Terminal.
	8.	Discuss site security measures that will be in place at the Terminal in the event of an incident.
	9.	Review potential personnel exposures (<i>i.e.</i> , H ₂ S, Benzene, MTBE) and other special Terminal site safety requirements to be followed during a response.
	10.	Review Contractor's equipment and resources. Discuss equipment available at the Terminal (if applicable), as well as the capability of the equipment.
	11.	Review the Site & Flow Diagrams as well as the Worst Case Discharge Diagram. (Onsite Oil flow patterns) Discuss Contain, Confine and Control Strategies.
	12.	Review the Spill Defensive Locations Diagram and the USGS Emergency Response Wall Chart (or equivalent). (Offsite Oil flow patterns) Discuss Contain, Confine and Control Strategies.
	13.	Review the types of products the Terminal handles and location of Material Safety Data Sheets.
	14.	Review items unique to the Terminal both operationally and site specific.
	15.	Walk the Terminal reviewing the operation and any changes since previous visit.
	16.	Comments:
Signatures:		
Terminal Manager		
	<i>Sign</i>	<i>Print Name</i>
Contractor Representative:		
	<i>Sign</i>	<i>Print Name</i>

Note: This sample Form 850 is to fulfill regulatory purposes only. Please use the online form in the PREP database for completion.

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WCD OSRO Environmental Services Contract

&

WCD OSRO Equipment Deployment Letter

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OSRO ENVIRONMENTAL SERVICES CONTRACT

(Following Pages)

Attention: Printed copies should be used with caution. The user of this document must ensure the current approved version of the document is being used.

EMERGENCY RESPONSE SERVICES CONTRACT
MARATHON PETROLEUM COMPANY LP
 539 South Main Street
 Findlay, Ohio 45840

THIS CONTRACT is entered into as of the 16th day of June, 2011 by and between **Marathon Petroleum Company LP**, a Delaware limited partnership with an address of 539 South Main Street, Findlay, Ohio 45840 (hereinafter "COMPANY") and **Progressive Environmental Services, Inc. d/b/a Eagle-SWS**, by and through its subsidiaries, a Delaware corporation having an address of 600 Grand Panama Boulevard, Suite 200, Panama City Beach, Florida 32407 (hereinafter "CONTRACTOR"). For purposes of this Contract, the term "COMPANY" includes any affiliates of Marathon Petroleum Company LP including, but not limited to, Catlettsburg Refining, LLC, Speedway LLC and Marathon Pipe Line LLC.

WITNESSETH:

THAT for and in consideration of the covenants, contract, terms, provisions and conditions hereinafter set forth, the parties do hereby mutually agree, each with the other, as follows:

ARTICLE 1 - SCOPE OF SERVICES

- 1.1 CONTRACTOR agrees to provide COMPANY, on an emergency basis, with services at Company's refineries, terminals, pipelines, service stations and transportation facilities (all hereinafter "Facilities") as may be required by Company to mitigate, remediate, cleanup or remove the conditions caused by a release, spill or discharge into the environment of crude oil, petroleum products, chemicals and other materials all as further described in Exhibit C to this Contract (hereinafter "Spill Response Services").
- 1.2 CONTRACTOR agrees, when called upon by COMPANY, that CONTRACTOR will respond with its best efforts using the appropriate personnel, equipment and supplies, ("Spill Response Resources") identified in Exhibit D to this Contract. CONTRACTOR further agrees, when called upon by COMPANY, that CONTRACTOR will utilize its best efforts to provide Spill Response Resources within response times stipulated by the COMPANY and/or applicable Federal and state laws, rules and regulations where such Spill Response Resources have not already been committed to a previous response. CONTRACTOR agrees to notify COMPANY promptly and in writing within seven (7) days, of any additions to or deletions from the list of Spill Response Resources identified in Exhibit D to this Contract, attached hereto and made a part hereof. CONTRACTOR also agrees to immediately notify COMPANY in writing in the event CONTRACTOR's response capability is reduced by 20% or more.
- 1.3 CONTRACTOR agrees that COMPANY may identify CONTRACTOR as a spill responder in any spill response plans required by or filed with applicable Federal and state governmental agencies including but not limited to the U.S. Coast Guard, provided COMPANY provides the CONTRACTOR the name, location, type of products and estimated worst case discharge.
- 1.4 In order to provide COMPANY with Spill Response Services capabilities, CONTRACTOR will:
- a. maintain or subcontract individuals on 24 hour call trained in current release control and clean-up technology in accordance with OSHA Hazwoper regulations 29CFR§1910.120 (including between 24 and 80 hours of training depending on the individual duties) and applicable regulations of the Department of Transportation and its subordinate agencies. All personnel must have attended an accredited training course, if so required by law, and be capable of administering the Spill Response Services required in this Contract;
 - b. maintain or subcontract for fully equipped emergency release control units adequate to provide coverage in the states and locations listed in Exhibit E, Facilities and States for Coverage of Spill Response Services, attached hereto and made a part hereof; and
 - c. upon receipt of an initiation of a request for Spill Response Services ("Initiation") as provided in this Article 1 below, promptly dispatch resources to arrive on the scene of the release within the time frame specified in Exhibit E, attached hereto and made a part hereof.
- 1.5 COMPANY may initiate a Spill Response Service by a direct telephone call to CONTRACTOR at the number identified in Exhibit D. Upon initiating Spill Response Services, COMPANY shall, to the best of its ability provide to CONTRACTOR such information as CONTRACTOR deems necessary. CONTRACTOR shall mobilize and dispatch initial CONTRACTOR

CONTRACTOR shall immediately report this information to COMPANY, and COMPANY shall, in its sole discretion make the required reports to said governmental authorities.

- 1.15 COMPANY recognizes that CONTRACTOR is not required to accept any waste transportation or disposal services, in connection with Spill Response Services, provided by CONTRACTOR nor is CONTRACTOR obligated to offer such waste transportation and disposal services. Any such services will be provided as agreed by the parties.

ARTICLE 2 NON-EMERGENCY RESPONSE SERVICES

- 2.1 In connection with providing Spill Response Services, CONTRACTOR may be requested by COMPANY to provide limited environmental services, including, but not limited to additional cleanup outside the scope of Spill Response Services, remediation or studies.
- 2.2 CONTRACTOR at COMPANY's request will develop jointly with COMPANY, an emergency response contingency plan. Such a contingency plan will be designed to be an extension to COMPANY's operation and would be directed by COMPANY personnel. It shall incorporate geographic response times, service type requirements, resource requirements, subcontractor recommendations and risk assessment information specifically for the locations specified at Exhibit E. CONTRACTOR will provide training, as necessary, to ensure that the subcontractors and COMPANY personnel understand the procedures set forth in Article 1 above.
- 2.3 CONTRACTOR shall, at the request of COMPANY, participate with COMPANY and any governmental agency designated by COMPANY in tests, inspections and drills to verify the availability and condition of the Spill Response Resources identified in Exhibit D to this Contract. CONTRACTOR shall fulfill the requirements to maintain its "OSRO" status at no charge to COMPANY and shall provide COMPANY with a copy of its certification by January 31 of each year.
- 2.4 CONTRACTOR shall immediately notify COMPANY of any safety related incident, including, but not limited to personal injury that occurs in connection with any Spill Response Services provided hereunder.

ARTICLE 3 – TERM

- 3.1 This Contract shall have a term of five (5) years commencing on June 16, 2011 and ending on June 15, 2016.

The term of this Contract shall be extended until completion of any outstanding Spill Response Services.

ARTICLE 4 - COMPENSATION

- 4.1 Spill Response Services to be furnished during the term of this Contract shall be furnished at the rates agreed to in writing by the parties (the "Rate Sheet") as identified on Exhibit F "Compensation" attached hereto and made a part hereof unless otherwise provided in the applicable Job Order.
- 4.2 For reimbursable Work:
- 4.2.1 Direct labor costs will be reimbursed at the actual payroll costs of direct labor wages, fringe benefits, payroll taxes and insurance required by collective bargaining agreement or by law, plus agreed profit margin and overhead;
- 4.2.2 Amounts in excess of such actual costs shall not be invoiced to COMPANY; and
- 4.2.3 Amounts invoiced for Social Security, payroll, unemployment, Workers' Compensation, or other federal, state, or local taxes or insurance in excess of CONTRACTOR's actual costs shall be promptly refunded to COMPANY.
- 4.3 No overtime work or premium rates will be paid or authorized by CONTRACTOR unless COMPANY has expressly approved such payment in writing.
- 4.4 CONTRACTOR must give thirty (30) days advance written notice of proposed rate changes to the Rate Sheet. No rate change or cost change will be effective until accepted by COMPANY in writing. Such change will not apply to any Spill Response Services in progress at time of notice without COMPANY's written consent.
- 4.5 CONTRACTOR shall comply with the requirements and procedures regarding compensation as outlined in Exhibit F attached hereto.

hereinabove.

ARTICLE 23 - SEVERABILITY

23.1 The provisions of this Contract are severable, and if any clause or provisions hereof shall be held invalid or unenforceable in whole or in part in any jurisdiction, then such invalidity or unenforceability shall affect only such clause or provision, or part thereof, in such jurisdiction and shall not in any manner affect such clause or provision in any other jurisdiction, or any other clause or provision in this Contract in any jurisdiction. Any such clause or provision held invalid or unenforceable, in whole or in part, to the extent permitted by law, shall be restricted in applicability or reformed to the minimum extent required for such clause or provision to be enforceable.

ARTICLE 24 - BINDING EFFECT

24.1 All rights conferred by this Contract shall be binding upon, inure to the benefit of, and be enforceable by or against the respective successors and assigns of the parties hereto.

ARTICLE 25 - HEADINGS

25.1 The subject headings in this Contract are for convenience only and are not determinative of the substance of the subject clause.

ARTICLE 26 - WAIVER

26.1 Any waiver by either party of any provision or condition of this Contract shall not be construed or deemed to be a waiver of any other provision or condition of this Contract, nor a waiver of a subsequent breach of the same provision or condition, unless such waiver is expressed in writing and signed by the parties. COMPANY's consent to delay in the performance by CONTRACTOR of any obligation shall not be applicable to any other obligation. Delay in the enforcement of any remedy in the event of a breach of any term or condition, or in the exercise by either party of any right, shall not be construed as a waiver of such remedy or right.

ARTICLE 27 - ETHICAL BUSINESS PRACTICES

27.1 No director, officer, employee or agent of CONTRACTOR shall give or receive any commission, fee, rebate, or gift, except those articles of nominal value given as sales promotion or holiday remembrances, or the value of reasonable entertainment consistent with local social and business custom, or enter into any business arrangement with any director, employee or agent of COMPANY without prior written notification thereof to COMPANY. CONTRACTOR shall promptly notify COMPANY of any violation of this paragraph and any consideration received as a result of such violation shall be paid or credited to COMPANY.

27.2 CONTRACTOR shall disclose in writing and shall assist COMPANY in identifying any financial transactions between any employee of COMPANY, including family members, and CONTRACTOR, its officers, directors, shareholders/owners and employees.

ARTICLE 28 - SURVIVAL

28.1 Except as otherwise provided herein warranties, covenants and obligations at Articles 7, 8, 12, and 14 shall survive termination or cancellation of this Contract, regardless of the reason for such termination or cancellation, and shall continue in full force and effect.

IN WITNESS WHEREOF, the parties hereto by their duly authorized representatives have executed this Contract as of the day and year first above written.

PROGRESSIVE ENVIRONMENTAL SERVICES, INC.

By: Terrence M. Healy
 Printed Name: Terrence m. Healy
 Title: SA Vice President Sales
 Taxpayer I.D.#: 26-3604581

MARATHON PETROLEUM COMPANY LP

By: MPC Investment LLC, its General Partner

By: Harold Rinehart
 Printed Name: Harold Rinehart
 Title: TTR ESTS Manager



(Revised: 10/01/2010)

WCD OSRO EQUIPMENT DEPLOYMENT LETTER

(Following Pages)

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Oil Spill Removal Organization

SWS Environmental Services

OSRO No. 247

SWS Environmental Services
600 Grand Panama Blvd
Suite 200
Panama City Beach, Florida 32407
1-877-742-4215
www.swsenvironmental.com
July 2011

Dear Valued Client,

SWS Environmental Services prides itself on being one of the premier *Emergency Response* contractors in the southeast United States. SWS Environmental Services is strategically located throughout multiple Marine Safety Office (MSO) / Captain of the Port (COTP) sectors allowing response coverage throughout the following MSO/COTP sectors:

- Key West, FL
- Miami, FL
- Tampa, FL
- Jacksonville, FL
- Savannah, GA
- Mobile, AL
- Paducah, KY
- Lower Mississippi (Formally MSO/COTP Memphis)
- Ohio Valley (Formally MSO/COTP Louisville)
- Corpus Christi
- Houston
- Port Arthur

Sub-ports:

- Jacksonville, (Port Canaveral, FL)
- Mobile (Port of Panama City, FL)
- Miami (Port Everglades, FL)
- Tampa (Port Manatee, FL)

SWS Environmental Services has met all criteria to qualify as a responder for all classifications (MMPD, WCD1, WCD2, WCD3) for the River/Canal and Inland categories within the Coast Guard OSRO classification guidelines dated April 27, 2001.

- MMPD = Maximum Most Probable Discharge
- WCD = Worst Case Discharge
- Tiers 1,2 and 3 = The combination of response resources and the times within which the resources must be capable of arriving on-scene to meet WCD resource requirements as defined in 33 CFR 154.1020 and 33 CFR 155.1025.

The attached documentation will provide a comprehensive overview of SWS Environmental Services and our capabilities for responding 24 hours a day, 7 days a week, 365 days a year.

SWS Environmental Services can provide a *Letter of Intent* or an *Environmental Response Services Agreement*. A *Letter of Intent* will confirm that the Contractor will be available for emergency response services. An *Environmental Response Services Agreement* outlines terms and conditions along with our rate schedule. For more information, please contact us at 1-877-742-4215 or you can visit us at our website at <http://www.eaglesws.com>.

Sincerely,

SWS Environmental Services



EQUIPMENT DEPLOYMENT REPORT

Documentation of SWS Environmental Services equipment used during spill response, drills or training.

PLEASE PROVIDE THE FOLLOWING INFORMATION UPON COMPLETION OF THE PROJECT

PROJECT DATE(S): July, 20, 2011 SWS JOB#: PD3-106-0427

NAME OF SUPERVISOR: Richard Kell PHONE/FAX: 270-444-8003

RESPONSIBLE PARTY: Yearly Spill Drill SERVICE CENTER Paducah, Ky.

MSO/COTP ZONE Louisville, Ky.

ENVIRONMENT (CIRCLE ONE)

PROTECTED

SHELTERED

{UNSHeltered}

GEOGRAPHICAL DESCRIPTION (FACILITY, BODY OF WATER, MILES OFFSHORE)

Ohio River between mile 934.5 and 936

EQUIPMENT DEPLOYED [Types of boom, boats, temporary storage devices, Command/Communications Center. 2-28' work boats, 1-26' work boat, 1-24' work boat, MSRC boat and barge with skimmer, 1300' 18" containment boom. The Command Center was at the Paducah Civic Center for the Table top portion of the drill.

PERSONNEL: [List by category]

Supervisors- 2, Foreman- 1, Boat Operator- 5, Technician-9

ADDITIONAL REMARKS:

This was a Table Top Drill and Equipment Deployment exercise put on for several of the local industries required to have these drills. The Coast Guard and other local government agencies play a part in the drill.

I certify that: 1) The equipment is in good working order and was properly operated in the environment indicated;
2) Involved personnel demonstrated competency in deployment and operation of the equipment.

July, 20, 2011

Richard Kell

DATE

PRINT NAME OF SUPERVISOR

SUPERVISOR SIGNATURE

This report is used for crediting SWS's client response plan holders for OSRO equipment deployment under the Preparedness Response Exercise Program (PREP), all deployments, whether during actual spill response, training or exercise / drills must be Properly documented. SWS must certify that: 1) Response equipment is operational; 2) Personnel are capable of deploying and



EQUIPMENT DEPLOYMENT REPORT

Documentation of SWS Environmental Services equipment used during spill response, drills or training.

PLEASE PROVIDE THE FOLLOWING INFORMATION UPON COMPLETION OF THE PROJECT

PROJECT DATE(S): 10-1-11 SWS JOB#: SV1-110-1012

NAME OF SUPERVISOR: Travis Young PHONE/FAX: 912-966-0686

RESPONSIBLE PARTY: Evergreen SERVICE CENTER Savannah

MSO/COTP ZONE Savannah Ga.

ENVIRONMENT (CIRCLE ONE)

PROTECTED

SHELTERED

UNSHeltered X

GEOGRAPHICAL DESCRIPTION (FACILITY, BODY OF WATER, MILES OFFSHORE)

Savannah River GPA CB 7

EQUIPMENT DEPLOYED [Types of boom, boats, temporary storage devices, Command/Communications Center.

1200 feet 18" Boom

17 foot Monark Boat

Boom Storage Trailer

PERSONNEL: [List by category

Bryan Lee -Tech

Randy Smith - Boat Operator

Mike Wilemon - Tech

Travis Young - Project Manager

ADDITIONAL REMARKS:

I certify that: 1) The equipment is in good working order and was properly operated in the environment indicated;
2) Involved personnel demonstrated competency in deployment and operation of the equipment.

10-1-11

Travis Young

DATE

PRINT NAME OF SUPERVISOR

SUPERVISOR SIGNATURE

This report is used for crediting SWS's client response plan holders for OSRO equipment deployment under the Preparedness Response Exercise Program (PREP), all deployments, whether during actual spill response, training or exercise / drills must be properly documented. SWS must certify that: 1) Response equipment is operational; 2) Personnel are capable of deploying and operating the equipment in a spill response; and 3) Response resources participate in annual deployment drills.

SMALL (AMPD) RESPONDER AUDIT FORM/EQUIPMENT LIST

(Following Pages)

Attention: Printed copies should be used with caution. The user of this document must ensure the current approved version of the document is being used.

MPC Audit Form

Oil Spill Removal Organization (OSRO)

Marathon Petroleum Company LLC

Site: KAM, Inc. (KAM)

OSRO Auditing Program

Date: 1/13/00

Signature of Auditor: _____

Updated: 2/7/2006**Owner and Site Information**

(Owner Information)		(Site Information)	
Owner Name:	(Same as Site)	Site Name:	KAM, Inc. (KAM)
Address 1:		Address 1:	2723 Manchester Road
Address 2:		Address 2:	P.O. Box 4039
City:		City:	Columbus
State:	Zip Code:	State:	GA Zip Code: 31904
Country:		Country:	USA
Contact 1:		Contact 1:	Tony Wright Cell: (706)577-9702
Contact 2:		Contact 2:	Michael Knight
Response Phone:		Response Phone:	(706)324-5765 or (334)297-2097
Business Phone:		Business Phone:	(706)324-5765 or (706)324-7508
FAX:		FAX:	(706)324-5639
Organization Type:	OSRO: <input type="checkbox"/> Yes <input type="checkbox"/> No	Organization Type:	C OSRO: <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Latitude/Longitude Coordinates:		Latitude/Longitude Coordinates:	
Degrees _____ <input type="checkbox"/> N _____ <input type="checkbox"/> E		(b) (7)(F)	
Minutes _____ <input type="checkbox"/> S _____ <input type="checkbox"/> W			
Seconds _____			
Is ER number answered 24 hrs/day, 7 days/wk?:	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	Insurance coverage? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	
Mobilization Time (minutes from call out to rolling):	7 days/wk 24 hr/day <u>45</u> Minutes.	Any off Hours?(when)	<u>NA</u>
LEGEND: ORGANIZATION TYPES			
OWNER: G = Government Agency	CO = CO-OP	SITE A = Administrative Site	C = Cleanup Site
S = Salvage Company	M = Manufacturer	W = Waste Site	O = Operator Site
O = OSRO	S = Support	M = Maintenance Site	V = Vessel Mooring Site
C = Cleanup Contractor			

MPC Audit Form

Oil Spill Removal Organization (OSRO)

Marathon Petroleum Company LLC

Site: KAM, Inc. (KAM)

OSRO Auditing Program

Date: 2/7/2006

Signature of Auditor: _____

PERSONNEL

Employee Title	Full Time	Part Time	No.#	Training Level/Specific Training/PPE Level
(KAM) Employees/Responders	X		18	HAZWOPER 40hr Technician Level
Total Responders @ Site: 18	X		18	(Confined Space Entry Trained)
	X		18	(First Aid/CPR Trained)
	X		18	(Patching Tools/Equipment)
	X		18	(Transfer/Trans-loading)
	X		18	(Cargo Tanks)
	X		18	(Diking/Containment)
	X		18	(Decontamination)
	X		18	(Fall Protection)
	X		18	(Lockout/Tagout)
	X		18	CDL Drivers A&B w/HAZMAT Endorsement.
	X		18	Heavy Equipment Operators
Project Management	X		4	Project Managers/Supervisors
	X		1	Safety Professional

Total Number of Employees at Site: 23

MPC Audit Form

Oil Spill Removal Organization (OSRO)

Marathon Petroleum Company LLC
OSRO Auditing Program

Date: 2/7/2006

Site: KAM, Inc. (KAM)

Signature of Auditor: _____

Prep. Exercises/Response to Incidents:

Date	Response/Drill	Location	Resources/Equipment at Response/Drill
Last 12 Months: Several responses were initiated that included the deployment of Boats, Containment Boom, Vac Truck, etc. These responses were for various petroleum and non-petroleum products.			
	Deployment Drills	Varies - several clients	Employee Training and Prep Requirements.
	Table Top Drills	Varies - several clients	Employee Training and Prep Requirements.

List Certifications, Licenses, Contracts, and Basic Order Agreements (BOA)

Federal, State, or Local Agency	Certification/License Number	Expiration Date	Comments
City of Columbus, GA Response			
Alabama licensed Env. Contractor			
24 hour Rental Agreements for additional equipment.			
Outside Laboratory work by client preference. No Sampling - would use 3rd party.			

List Geographical Area of Coverage: 120 Mile Radius of locations. (Will Travel Anywhere)

Operating Environments (check all that apply):

Land Inland rivers/lakes Marine near-shore Marine off-shore HAZMAT Responder Shoreline

MPC Audit Form

Oil Spill Removal Organization (OSRO)

Marathon Petroleum Company LLC

Site: KAM, Inc. (KAM)

OSRO Auditing Program

Date: 2/7/2006

Signature of Auditor: _____

Containment Boom:

Owner	Location	(BT)	(CT)	(Env)	Manufacturer	Freeboard (inches)	Skirt (inches)	Height (inches)	Length (feet)	Selection Codes					
										B	A	T	P	D	
(KAM)	Columbus, GA	U	C	RI	Containment Boom	-----	-----	18	200	Y	Y	Y	N	Y	
(Access to Boom from S&S Co. of GA)															
Owner	Location	(BT)	(CT)	(Env)	Manufacturer	Freeboard (inches)	Height (inches)	Length (feet)	Quantity	Selection Codes					
										B	A	T	P	D	
(KAM)	Columbus, GA	OT	U	RI	(Absorbent Boom)	-----	4" - 8"	-----	Several Bales	Y	Y	Y	Y	Y	
Bundles of absorbent pads, pillows, sweeps, and bags of dry/chemical absorbent stored at facility.											Y	Y	Y	Y	Y

LEGEND:			
Boom Type (BT)	Connector Type (CT)	Environment (Env)	Selection Codes
C = Curtain	AN = ANSI	R = River/Canal	B = USCG BOA/MOU
F = Fence	AS = ASTM	I = Inland	A = Available
FR = Fire	B = Bolt	O = Ocean	T = Transportable
I = Ice	Q = Quick	G = Great Lake	P = Packaged
IN = Intertidal	SLI = Slide		D = Dedicated
OT = Other	SLO = Slotted		
	U = Universal		
	OT = Other		

Additional Comments or Explanation Below:

(Several anchors are available for anchoring the boom)

MPC Audit Form

Oil Spill Removal Organization (OSRO)

Marathon Petroleum Company LLC
 OSRO Auditing Program
 Date: 2/7/2006

Site: KAM, Inc. (KAM)

Signature of Auditor: _____

Product Transfer Pumps

Owner	Location	Power (PC)	PUMP (TPT)	Qty (each)	Manufacturer/Additional Information	Capacity (gpm)	Weight (pounds)	Selection Codes				
								B	A	T	P	D
(KAM)	Columbus, GA	A	D	1	1" Double Diaphragm Pump	-----	Portable	Y	Y	Y	N	N
(KAM)	Columbus, GA	A	D	1	2" Double Diaphragm Pump	-----	Portable	Y	Y	Y	N	N
(KAM)	Columbus, GA	E	C	1	2" Submersible Pump	-----	Portable	Y	Y	Y	N	N
(KAM)	Columbus, GA	G	C	1	3" Trash Pump	-----	Portable	Y	Y	Y	N	N
(KAM)	Columbus, GA	G	C	1	6" Trash Pump	-----	Portable	Y	Y	Y	N	N

LEGEND:		
Power Codes (PC)	Transfer Pump Type (TPT)	Selection Codes
A = Air	A = Archimedian Screw	B = USCG BOA/MOU
D = Diesel	B = Bladeless	A = Available
E = Electric	C = Centrifugal	T = Transportable
G = Gas	D = Diaphragm	P = Packaged
H = Hydraulic	P = Peristaltic	D = Dedicated
N/A = Not Applicable	PC = Progressive Cavity	
OT = Other	S = Sliding Shoe	
	OT = Other	

List any special requirements or hoses for using equipment:

 Sufficient supply of suction, discharge, and chemical hose of various sizes and materials.

 Drum Pumps.

 Additional portable pumps and power packs available by rental.

MPC Audit Form

Oil Spill Removal Organization (OSRO)

Marathon Petroleum Company LLC
 OSRO Auditing Program
 Date: 2/7/2006

Site: KAM, Inc. (KAM)

Signature of Auditor: _____

Support Vessel(s)

Owner	Location	Type	(VT)	(Env)	H/P	Length (ft)	Transit (knots)	Storage (gal)	Qty (ea)	Selection Codes							
										B	A	T	P	D	O	N	S
(KAM)	Columbus, GA	John Boats w/Electric Trolling Motors	J	RI	-----	14	-----	NA	3	Y	Y	Y	N	N	N	N	Y

LEGEND:		
Environment (Env)	Vessel Type (VT)	Selection Codes
R = River/Canal	C = Crane	B = USCG BOA/MOU
I = Inland	D = Deck Barge	A = Available
O = Ocean	H = Hotel Barge	T = Transportable
G = Great Lakes	J = John Boat	P = Packaged
	T = Trawler	D = Dedicated
	U = Utility Work Boat	O = Offload Capable
	OT = Other	N = Night Capability
		S = Shallow Water

Describe any special requirements for using this equipment:

Sufficient Trailers and equipment to transport vessels.

Boating safety equipment (ie. Life rings, Life vests, Air Horns, & Flare Kits.)

(Several anchors are available for anchoring the vessels)

MPC Audit Form

Oil Spill Removal Organization (OSRO)

Marathon Petroleum Company LLC

OSRO Auditing Program

Date: 2/7/2006

Site: KAM, Inc. (KAM)

Signature of Auditor: _____

Skimmers

Owner	Location	Skimmer	(ST)	(Env)	Capacity (bpd)	Product Group	Storage (gal)	Qty (ea)	Selection Codes						
									B	A	T	P	D	S	
(KAM)	Columbus, GA	NONE													
		(Rental from Atlanta, GA)													

LEGEND:			
Environment (Env)	Skimmer Type (ST)	Selection Codes	Product Group
R = River/Canal	A/S = Air	B = USCG BOA/MOU	1
I = Inland	B/A = Belt/Adhesion	A = Available	2
O = Ocean	D/A = Disc/Adhesion	T = Transportable	3
G = Great Lakes	O = Oleophilic	P = Packaged	4
	R/A = Rope Adhesion	D = Dedicated	5
	V/S = Vortex/Suction	S = Self Propelled	
	W = Weir		
	W/S = Weir/Suction		
	OT = Other		

Describe special requirements for using this equipment:

MPC Audit Form

Oil Spill Removal Organization (OSRO)

Marathon Petroleum Company LLC
 OSRO Auditing Program
 Date: 2/7/2006

Site: KAM, Inc. (KAM)

Signature of Auditor: _____

Oil/Water Separators

Owner	Location	Type	Separator Type	Capacity (Gal)	Quantity (each)	Selection Codes				
						B	A	T	P	D
(KAM)	Columbus, GA	NONE								
		(Frac Tanks could be used for Oil/Water Separation.)	G	21000						

LEGEND:	
Selection Codes	Separator Type
B = USCG BOA/MOU	C = Centrifuge
A = Available	CO = Coalescing
T = Transportable	F = Filter
P = Packaged	G = Gravity
D = Dedicated	OT = Other

Comments:

Frac Tanks would be rented.

MPC Audit Form

Oil Spill Removal Organization (OSRO)

Marathon Petroleum Company LLC

Site: KAM, Inc. (KAM)

OSRO Auditing Program

Date: 2/7/2006

Signature of Auditor: _____

Portable/Temporary Storage

Owner	Location	Model	Storage (Type)	Capacity (Gals)	Quantity (each)	Selection Codes				
						B	A	T	P	D
(KAM)	Columbus, GA	Poly Tanks	M	1000	5	Y	Y	Y	N	N
(KAM)	Columbus, GA	Fuel Truck	T	6000	1	Y	Y	Y	N	N
(KAM)	Columbus, GA	Water Truck	T	3000	1	Y	Y	Y	N	N

Comments:

Drums and overpacks of different sizes and make of material are available at the facility.

Frac Tanks and Rolloff containers can be rented.

LEGEND:	
Selection Codes	Portable Storage Type
B = USCG BOA/MOU	I = Inflatable
A = Available	M = Modular Storage Container
T = Transportable	O = Oil Storage Bag
P = Packaged	T = Tank Trucks
D = Dedicated	OT = Other

MPC Audit Form

Oil Spill Removal Organization (OSRO)

Marathon Petroleum Company LLC

OSRO Auditing Program

Date: 2/7/2006

Site: KAM, Inc. (KAM)

Signature of Auditor: _____

Vacuum System(s)

Owner	Location	Manufacturer	Holding Capacity Storage In Gals	Vac Type	Capacity (bpd)	Quantity (each)	Selection Codes							
							B	A	T	P	D			
(KAM)	Columbus, GA	NONE												
		(Vacuum Truck Access via Rental Agency)												

LEGEND:	
Selection Codes	Type of Vac Sys
B = USCG BOA/MOU	L = Loader
A = Available	T = Truck
T = Transportable	
P = Packaged	
D = Dedicated	

Describe any special requirements for using this equipment:

Several Portable Wet/Dry Vacuums & Drum Vacuums.

MPC Audit Form

Oil Spill Removal Organization (OSRO)

Marathon Petroleum Company LLC

Site: KAM, Inc. (KAM)

OSRO Auditing Program

Date: 2/7/2006

Signature of Auditor: _____

Beach Cleaners

Owner	Location	Beach Cleaner Type	Quantity (each)	Selection Codes					
				B	A	T	P	D	S
(KAM)	Columbus, GA	Trailer Mounted Steam Cleaners w/500 gal Water Tank	2	Y	Y	Y	N	N	Y
(KAM)	Columbus, GA	1800psi Pressure Washer	1	Y	Y	Y	N	N	Y
Additional Equipment that could be used for this is included with the Support Equipment Section.									

Describe any special requirements for using this equipment:

Plenty of high pressure hose.

LEGEND:	
Selection Codes	Beach Cleaner Types
B = USCG BOA/MOU	M = Manual Cleaner
A = Available	M/C = Mechanical Cleaner
T = Transportable	M/H = Mechanical Hydraulic
P = Packaged	P/B = Paddle Belt
D = Dedicated	S/B = Screening Belt
S = Self Supported	V/C = Vacuum Washer
	OT = Other

MPC Audit Form

Oil Spill Removal Organization (OSRO)

Marathon Petroleum Company LLC

OSRO Auditing Program

Date: 2/7/2006

Site: KAM, Inc. (KAM)

Signature of Auditor: _____

Fire-Fighting Equipment

Owner	Location	Model	Quantity (each)	Weight (pounds)	Selection Codes				
					B	A	T	P	D
(KAM)	Columbus, GA	NONE							
(No fire-fighting equipment for major fires, hand held fire extinguishers are available for small fires.)									

LEGEND:
Selection Codes
B = USCG BOA/MOU
A = Available
T = Transportable
P = Packaged
D = Dedicated

Describe any special requirements for using this equipment:

MPC Audit Form

Oil Spill Removal Organization (OSRO)

Marathon Petroleum Company LLC
 OSRO Auditing Program
 Date: 2/7/2006

Site: KAM, Inc. (KAM)

Signature of Auditor: _____

Dispersant(s)

Owner	Location	Manufacturer	Model	Quantity (gal)	Weight (pounds)	Selection Codes				
						B	A	T	P	D
(KAM)	Columbus, GA									
(Oil dispersants used for dry land cleaning applications, such as equipment and roadways)										
NONE USED FOR WATERWAY CLEANUP										

Dispersant Delivery

Owner	Location	Manufacturer	Model	Quantity (each)	Weight (pounds)	Selection Codes				
						B	A	T	P	D
(KAM)	Columbus, GA									
NONE										

LEGEND:	
Selection Codes	Dispersant Delivery Types
B = USCG BOA/MOU	FS = Foam Stockpile
A = Available	T = Team
T = Transportable	V = Vessel
P = Packaged	OT = Other
D = Dedicated	

Describe any special requirements for using this equipment:

Regulatory Agency approval for use on waterways.

Oil Spill Removal Organization (OSRO)

Marathon Petroleum Company LLC
OSRO Auditing Program

Site: KAM, Inc. (KAM)

Date: 2/7/2006

Signature of Auditor: _____

(i.e. Transportation, Communication, Personal Protective, Salvage, Aerial Surveillance, Computerized Spill Tracking Equipment.)

Owner	Location	Equipment	Quantity (each)	Comments Concerning This Equipment
(KAM)	Columbus, GA	Tools	Several	(Shovels, Rakes, Hoes, Squeegees, Mops, Nets, Chainsaws, Rope, Plugging, Leaf Blowers, Heaters, Welders, Tamp, Etc.)
				Communication: (Mobile & Portable Radios)(Cellular Phones)(Pagers)
				Several: Generators, Air Compressors, Air Blowers, Power Supplies, & Portable Lighting.
	Direct Services Provided:	Site Remediation, Source & Incident Control, Product Transfer, Industrial Cleaning, Pond & Landfill Closures, Waste Transport, Construction, Excavation, UST's, Vapor Extraction Systems, and Emergency Response.		
	Responder PPE:	(Type "A,B,C,D" PPE), 1st Responder Suits, SCBA units, Portable Eyewashes, First Aid Kits, Hip Airs, Protective Gloves and Boots, Respirators w/Assorted Cartridges, Decontamination Equipment, Traffic Control.		
	Analytical services, equipment, and qualified operating personnel: Outside Lab work by client preference. No Sampling - use 3rd party. Oxygen Analyzers, Toxic Gas Analyzer, Combustible & Multi Gas Indicators, PH Indicators, Acid Neutralization, Hazcat Kits.			
(KAM)	Columbus, GA	24' ER Truck	1	Fully Equipped for Oil Spill Response.
(KAM)	Columbus, GA	16' ER Storage Trailer	1	Storage, Absorbents, Drums.
(KAM)	Columbus, GA	48' Flatbeds	2	Equipment Transport.
(KAM)	Columbus, GA	Lowboy Dropdeck	1	50 Ton
(KAM)	Columbus, GA	Lowboy	1	40 ton
(KAM)	Columbus, GA	24' Egar Beaver Trailer	1	Backhoe Transport.
(KAM)	Columbus, GA	Trackhoes	4	PC200 - PC300
(KAM)	Columbus, GA	Dozers	5	D37 - D65
(KAM)	Columbus, GA	End Loaders	2	
(KAM)	Columbus, GA	Backhoes	3	
(KAM)	Columbus, GA	Dump Trucks	8	16 Yds
(KAM)	Columbus, GA	Dump Trailers	2	24 Yds
(KAM)	Columbus, GA	Off Road Haul Trucks	2	30 Yds
(KAM)	Columbus, GA	Crew Cab Pickup Trucks	4	
(KAM)	Columbus, GA	Suburban	1	
(KAM)	Columbus, GA	Motro Grader	1	

Oil Spill Removal Organization (OSRO)

Marathon Petroleum Company LLC
OSRO Auditing Program
Date: 2/7/2006

Site: KAM, Inc. (KAM)

Signature of Auditor: _____

Group V Oil/Asphalt Cleanup

Owner	Location	Cleanup Equipment Type	Quantity (each)
(KAM)	Columbus, GA	Methods for locating the petroleum oil on the bottom or suspended in the water column. (ie. Sonar, sampling equipment, divers, or other)	
		List:	
		Rent and/or Subcontract.	
		Methods for containing the petroleum oil on the surface or suspended in the water column. (ie. Containment boom or fence, silt curtains, or other to reduce bottom spreading)	
		List:	
		Containment Boom, Containment Fence, and Silt Curtains.	
		Bottom and shoreline recovery equipment. (ie. Dredges, pumps, or other)	
		List:	
		Rent and/or Subcontract.	
		Equipment necessary to assess the impact of such discharges.	
		List:	
		Rent and/or Subcontract.	
		Other equipment necessary to respond to a discharge of the type petroleum oil stored or transported.	
		List:	
		Backhoes, Dump Trucks, Pressure Washers, Trackhoes, Dozers, End Loaders, Track Loader.	
Additional Equipment that could be used for this is included with the Support Equipment Section.			

Is equipment capable of being obtained and deployed within 24hrs ? Yes No

Describe any special requirements for using this equipment:

Section G: Terminal Drawings and Maps

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EPA – MPC FRP Diagram Cross Reference
(for Section 1.9 Diagrams from App F to 40 CFR 112)

EPA Site Plan Diagram

Item	EPA Item Description	MPC Diagram Location
A	Entire facility to scale	Site Diagram
B	Above and below ground oil storage tanks	Site Diagram
C	Contents and capacities of bulk oil storage tanks	Site Diagram
D	Contents and capacities of drum oil storage areas	Site Diagram (note if not present)
E	Contents and capacities of surface impoundments	Site Diagram (note if not present)
F	Process buildings	Site Diagram
G	Transfer areas	Site Diagram
H	Secondary containment systems	Site and Flow Diagram
I	Structures where hazmat is stored or handled	Site Diagram
J	Location of communication and emergency response equipment	Terminal Site Evacuation, Site Fire, and Site Security Diagram
K	Location of electrical equipment that contains oil	Site Diagram
L	Jurisdictional interface	USCG Dock and EPA/USCG Jurisdictional Diagram

EPA Site Drainage Plan Diagram

Item	EPA Item Description	MPC Diagram Location
A	Major sewers, manholes and drains	Site and Flow Diagram (SPCC)
B	Weirs and shut off valves	Site and Flow Diagram (SPCC)
C	Surface water receiving streams	Site and Flow Diagram (SPCC)
D	Fire fighting water sources	Terminal Site Evacuation, Site Fire, and Site Security Diagram
E	Other utilities	Terminal Site Evacuation, Site Fire, and Site Security Diagram
F	Response personnel ingress and egress	Emergency Response Diagram
G	Response equipment transportation routes	Emergency Response Diagram
H	Direction of spill flow from discharge points	Spill Defensive Locations Diagram (if present) and First Response Strategy Report (if present in Action Plan)

EPA Site Evacuation Plan Diagram

Item	EPA Item Description	MPC Diagram Location
A	Site plan diagram with evacuation routes	Terminal Site Evacuation, Site Fire, and Site Security Diagram
B	Location of evacuation regrouping areas	Terminal Site Evacuation, Site Fire, and Site Security Diagram

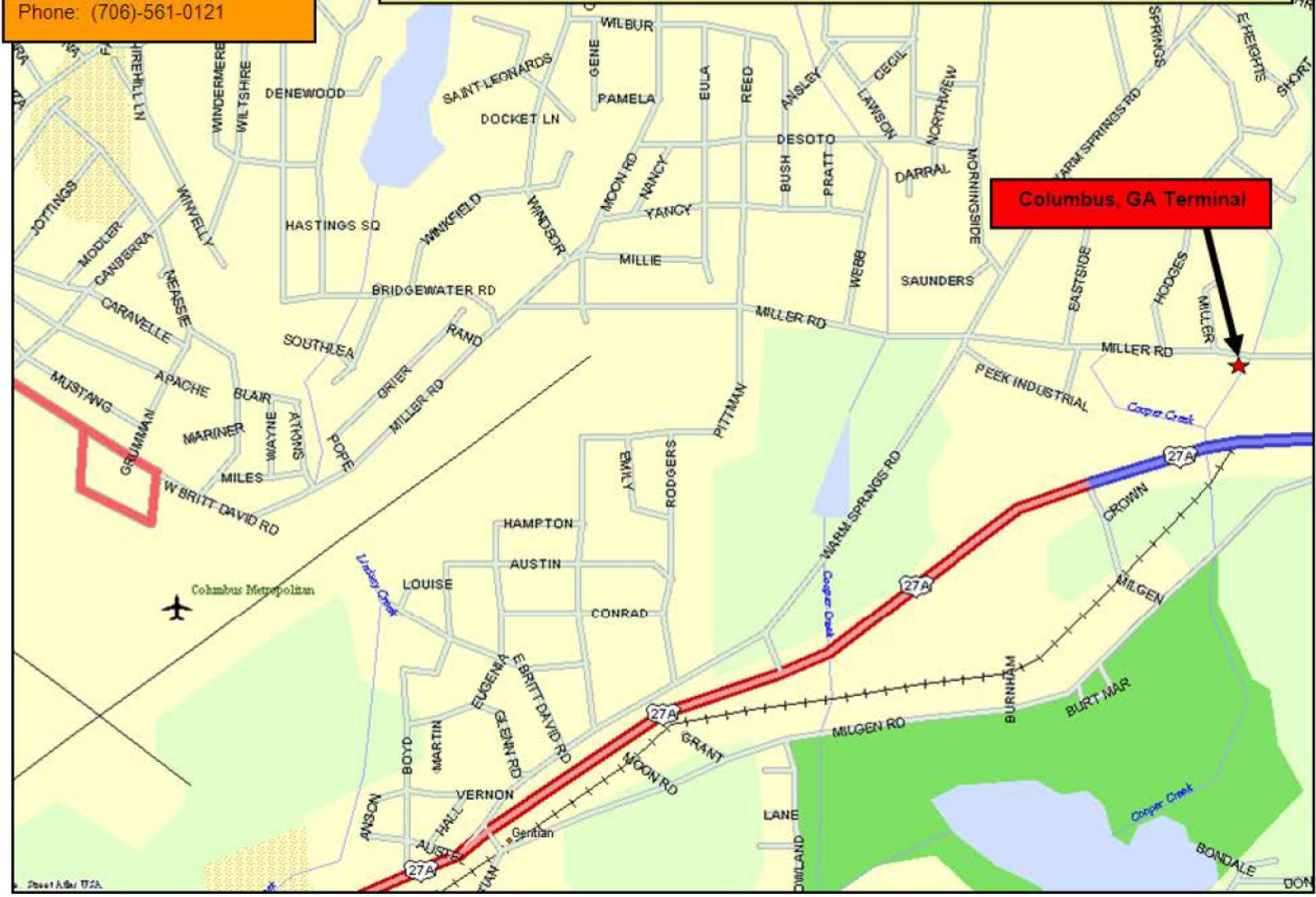
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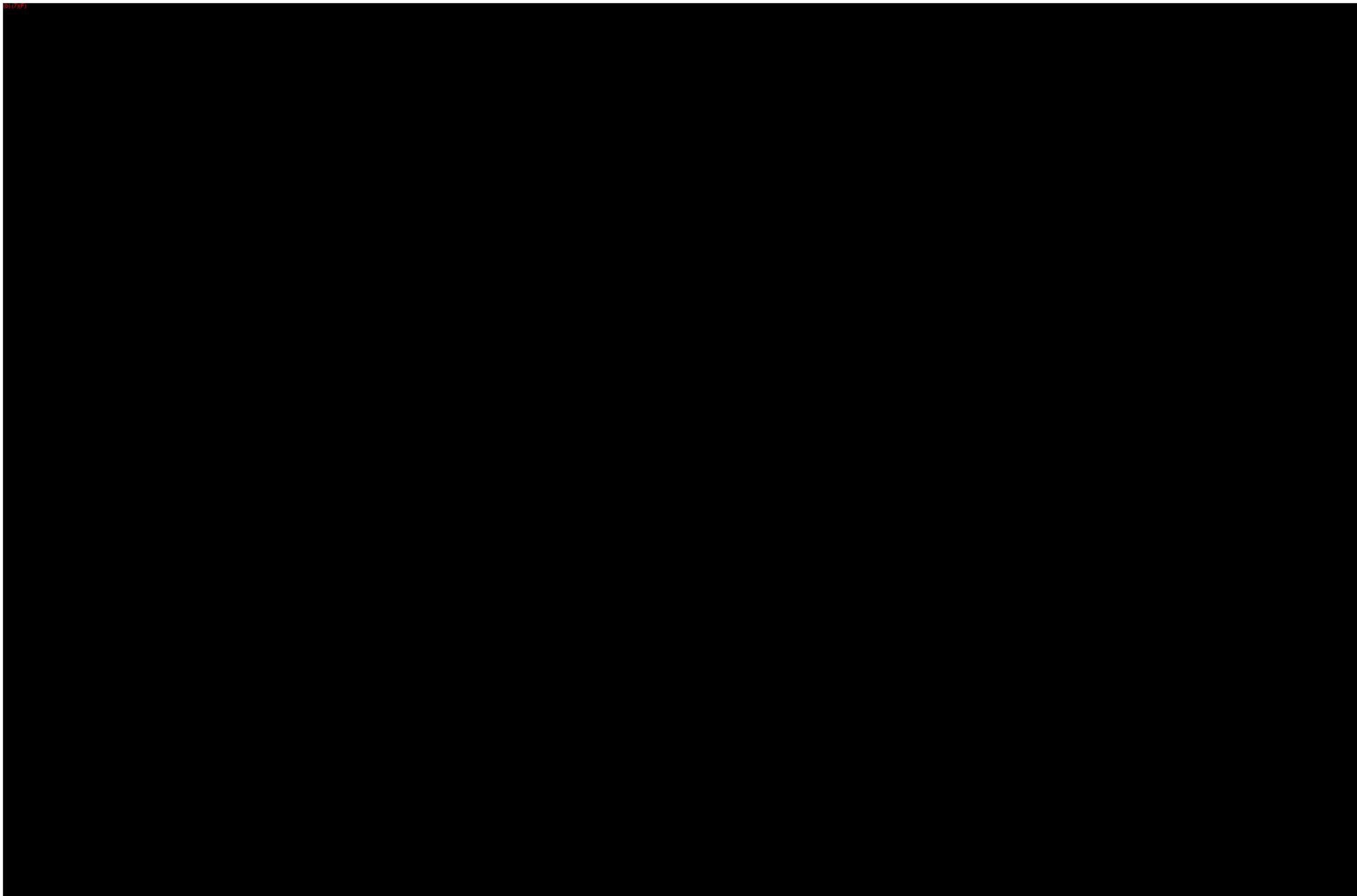
Columbus, GA LP Terminal
5030 Miller Road
Columbus, GA 31908
Phone: (706)-561-0121

From I-185
Take Airport Thruway east at Exit 6. Turn right on Miller Road Proceed on Miller and approximately 1 mile. Terminal will be on your right.

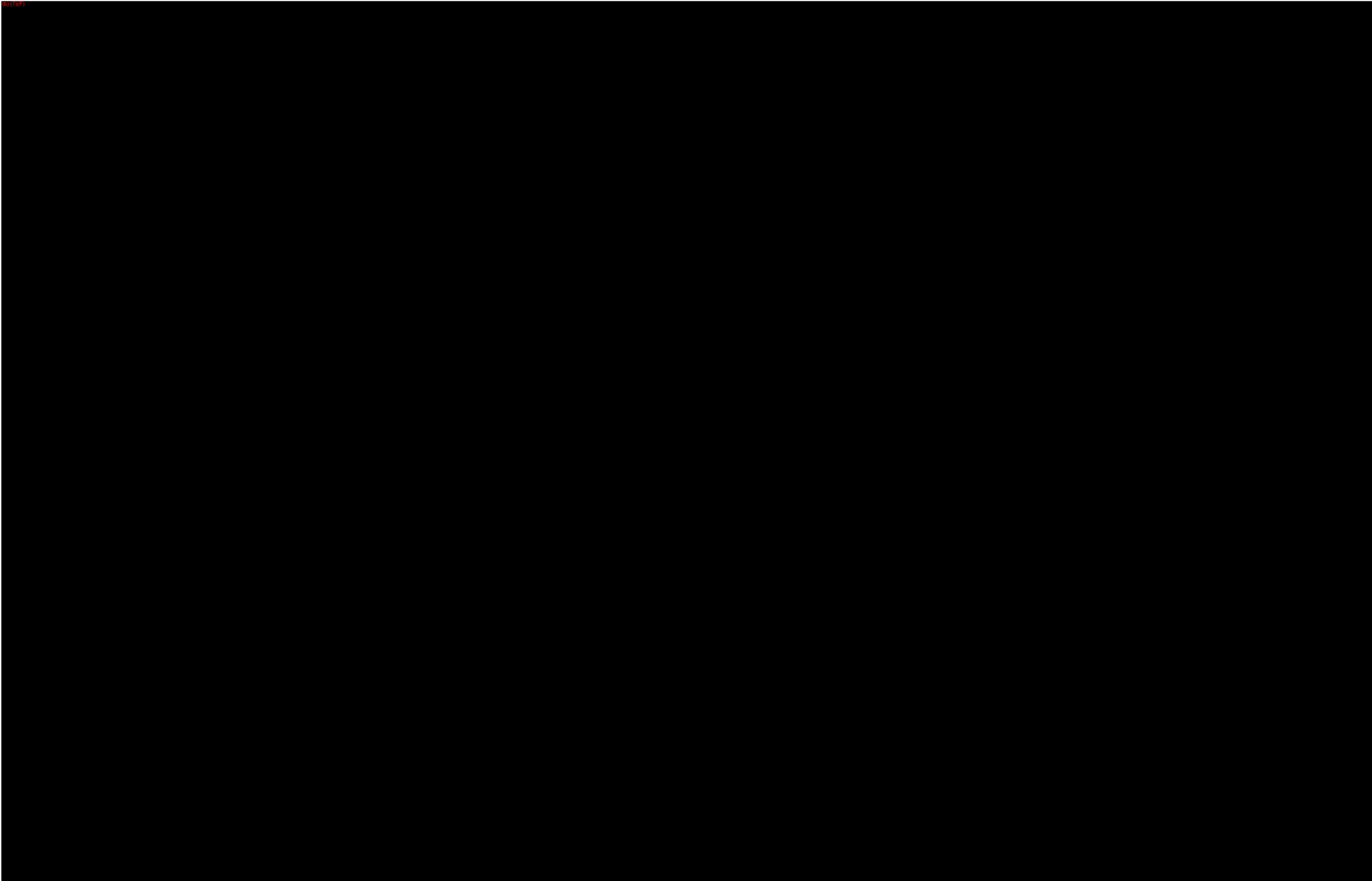


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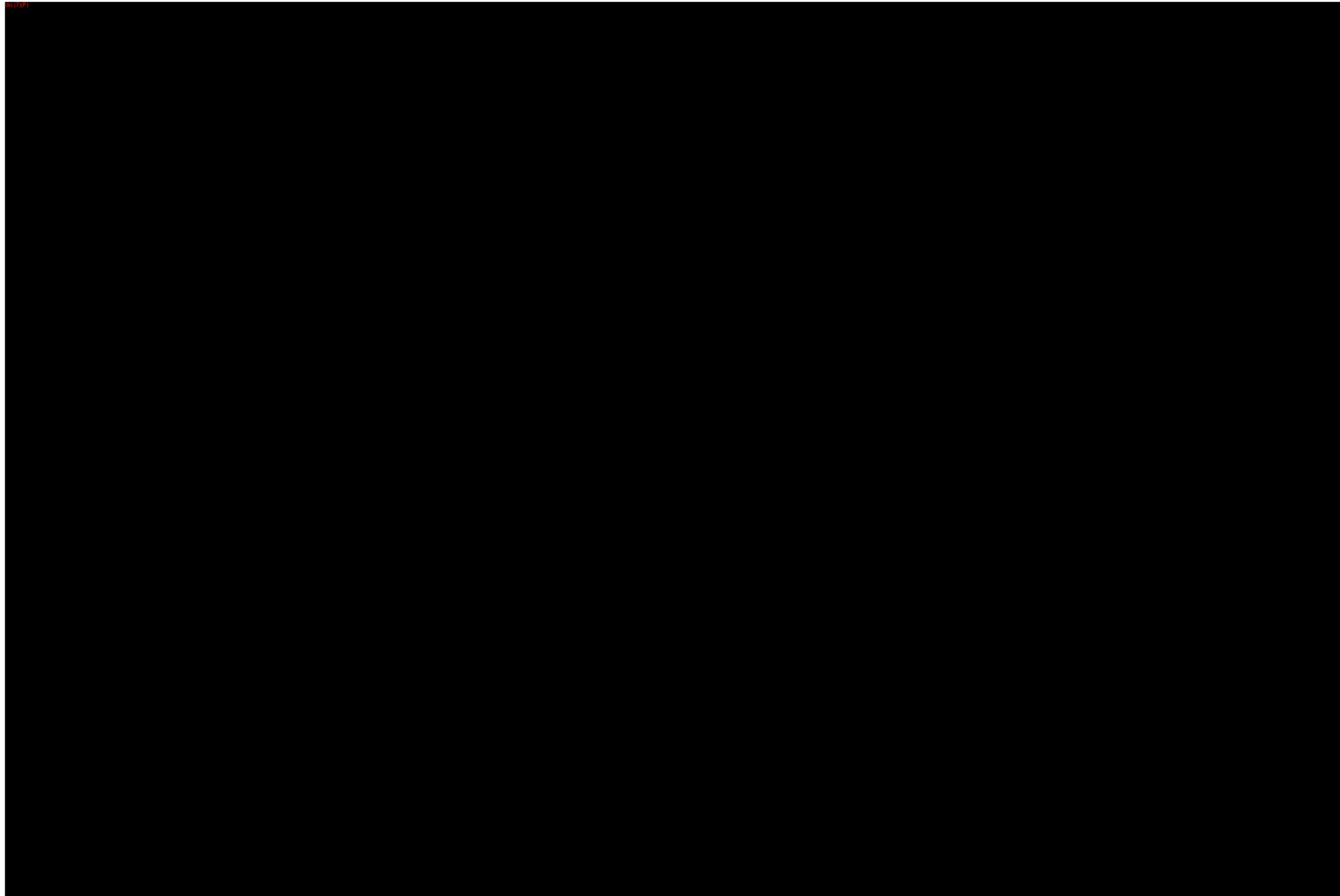
(b) (7)(F)



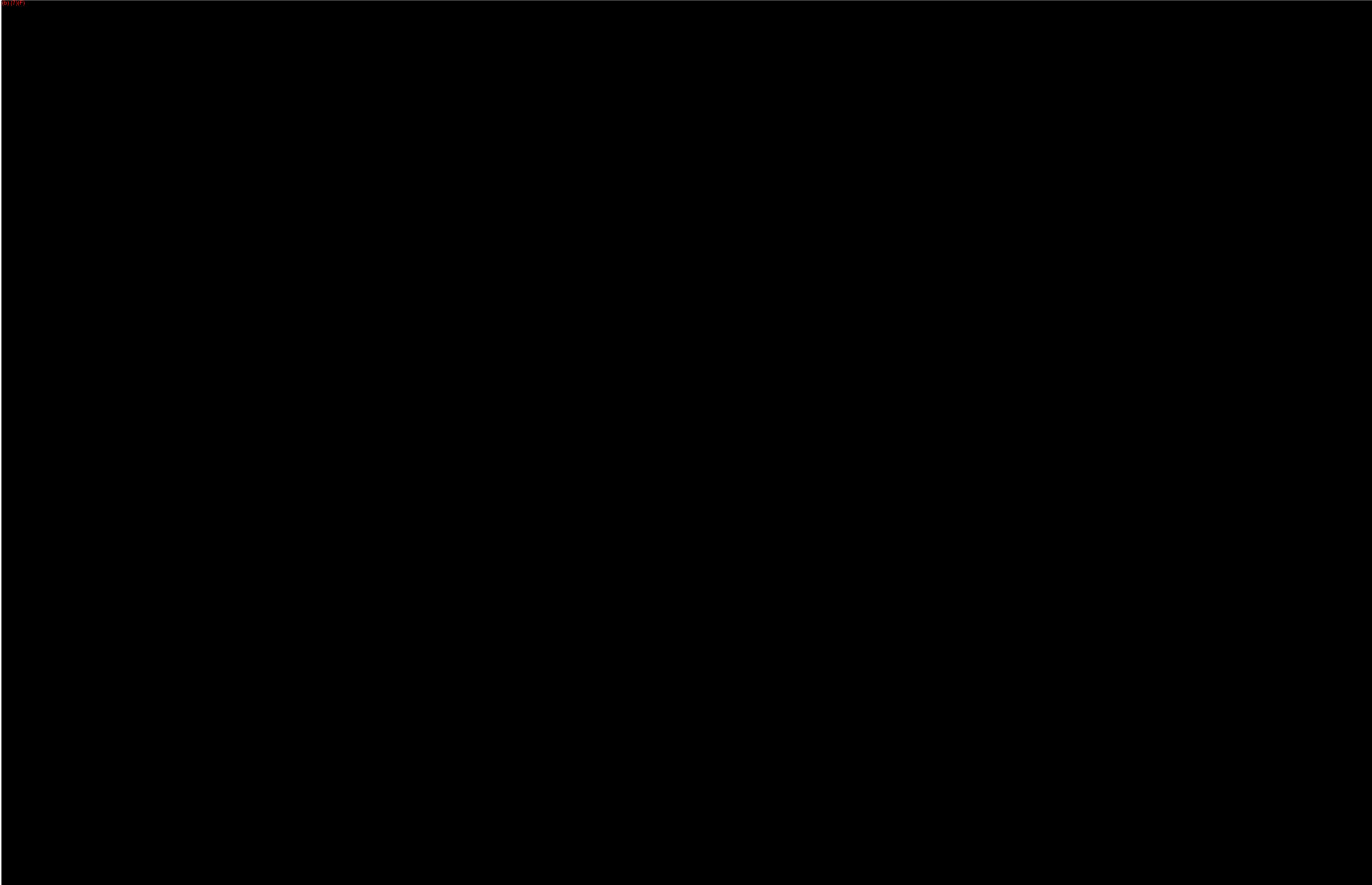
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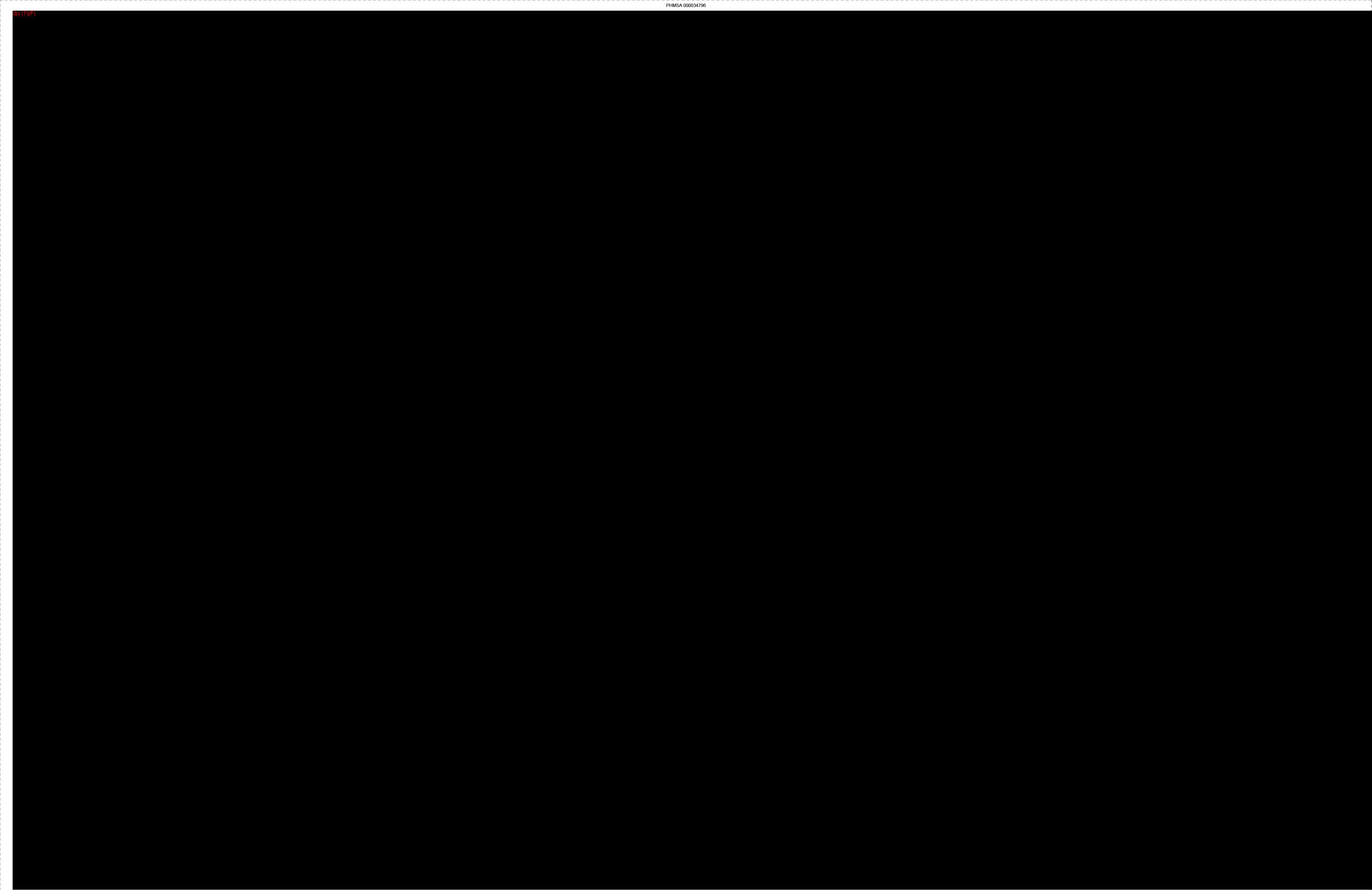


(b) (7)(F)

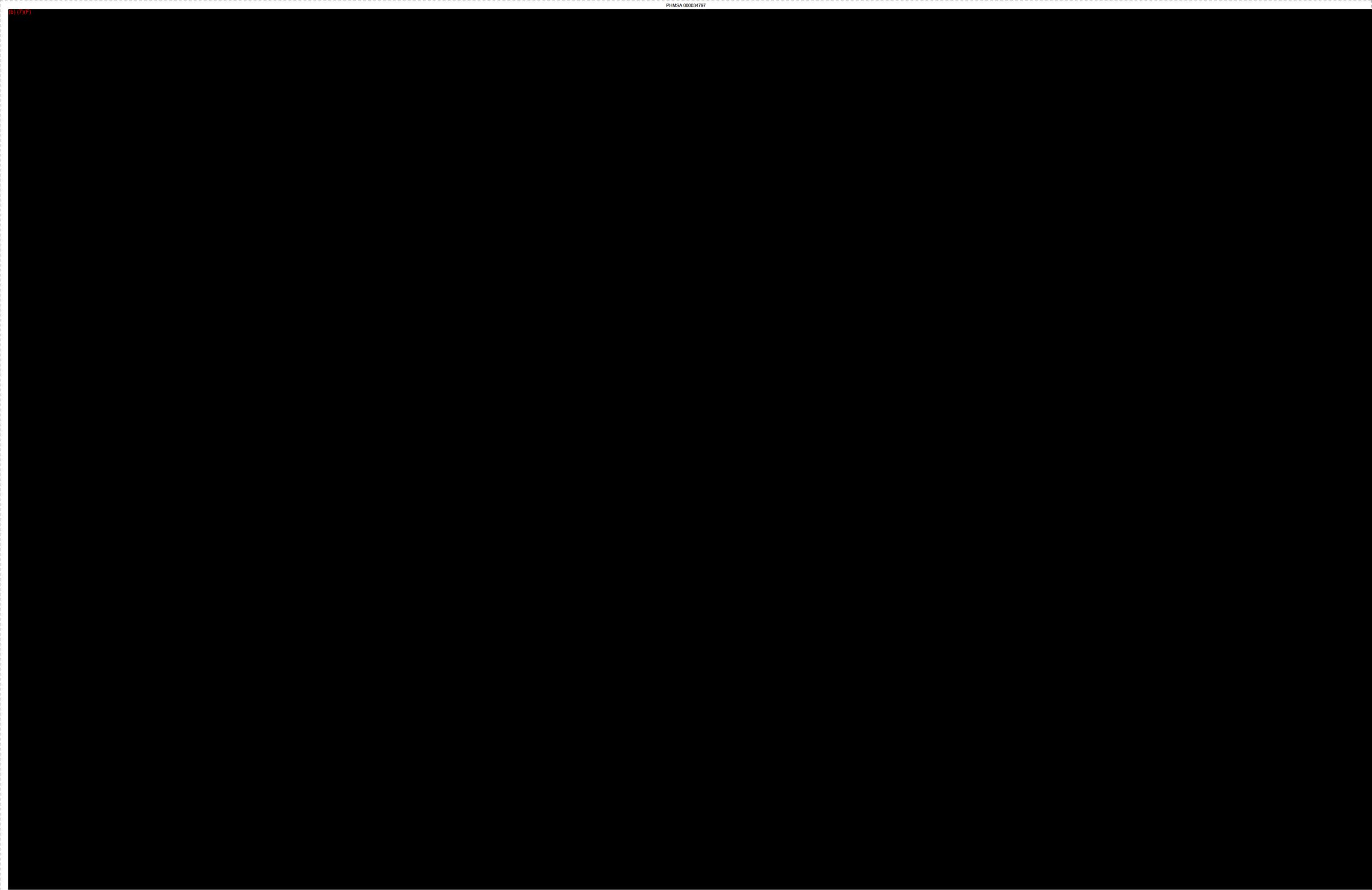


(b) (7)(F)

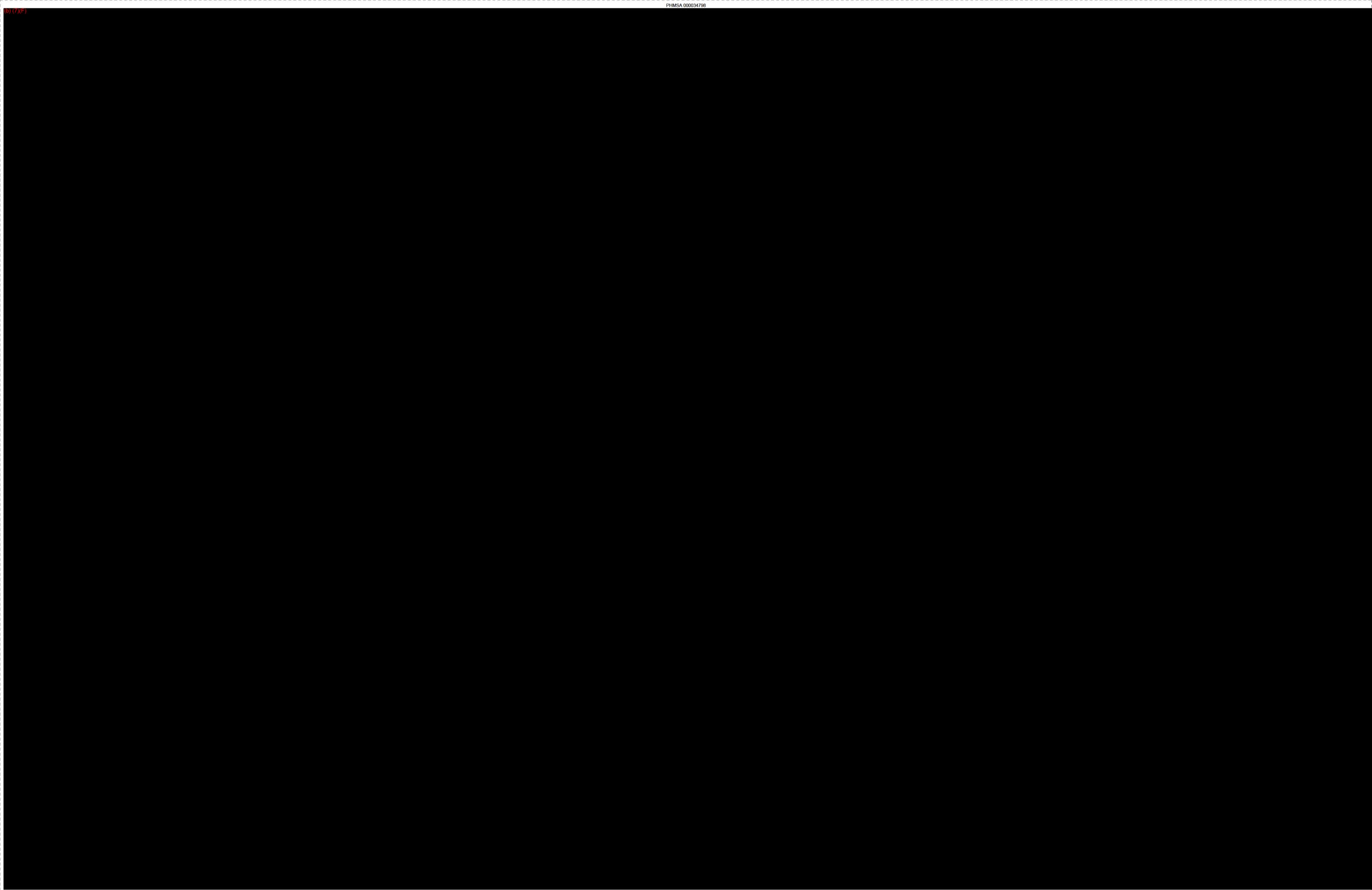




(b) (7)(F)



(b) (7)(F)



Section H: Hazard Evaluation / Identification

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HAZARD EVALUATION / IDENTIFICATION

This section describes the products stored at this Terminal and their hazards. All Terminal tanks and their identification number, product, capacity, type, year built and size are described on the Storage Tank Identification & Secondary Containment/Diked Areas pages.

There are fourteen (14) aboveground tanks at the Columbus, GA Light Products facility: (3) Gasoline, (1) Ethanol, (2) Diesel Oil, (1) Transmix, (4) Additive, (2) Water, (1) Out of Service..

All of the aboveground tanks that contain oil or hazardous materials have secondary containment sufficient to contain the shell capacity of the largest tank plus freeboard for a rain event.

Containment areas and tanks within each containment area are summarized below.

Containment Area Number	Tank Numbers
CA1	Tanks: T-3, 15-1, 15-2, 20-4, 20-7, 30-5, 30-6
CA2	Tanks: AA-1-2
CA3	Tank: AA-5-1
CA4	Tank: WA-12-1, WA-12-2
CA5	Tank: AA-2-5, AA-1-4

All of the above listed dike areas are sufficient to contain the shell capacity of the largest tank plus freeboard for a rain event.

Surface Impoundments

There are no surface impoundments as described in 40 CFR 112, Appendix F, Section 1.4.1.

Labeled Schematic Drawings

See Section G for labeled schematic drawings of the terminal.

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HAZARD CLASSIFICATION

Product	Hazard Class
Gasoline	Flammable
Diesel Oil	Combustible
Transmix	Flammable
Additive	Flammable
Ethanol	Flammable

* These products are not classified as oil under 40 CFR 112.

LOCATION OF MATERIAL SAFETY DATA SHEETS AND SARA 312 REPORTS

Material Safety Data Sheets (MSDS) for all products and substances listed above are located in the Terminal office and are readily accessible. At the discretion of the Terminal Manager, MSDS can be placed at the end of this section for ready reference. MSDS are also posted on MaraView.

SARA 312 Reports are located in the HES&S manuals.

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Storage Tank Identification & Secondary Containment / Diked Areas

Columbus, GA Light Products Terminal

40 CFR Part 112 Appendix F 1.4.1 and 49 CFR 194

5/01

Tank No.	Product	(b) (7)(F)	Roof Type/ Year of Construction or Re-fabrication Date	(b) (7)(F)	Composition of Tank	Failure/ Cause	(b) (7)(F)	Containment Area Number
T-3	Transmix		C 1976		Steel	N/A		CA1
15-1	Ethanol		CF 1957		Steel	N/A		CA1
15-2	Fuel Oil		C 1957		Steel	N/A		CA1
20-4	Gasoline		CF 1998		Steel	N/A		CA1
20-7	Gasoline		CF 1970		Steel	N/A		CA1
30-5	Gasoline		CF 1953		Steel	N/A		CA1
30-6	Gasoline		CF 1977		Steel	N/A		CA1
AA-1-2	Additive		H 1987		Steel	N/A		CA2
AA-10-3	Out of Service		H 1975		Steel	N/A		
AA-5-1	Additive		H		Steel	N/A		CA3
WA-12-1	Water		H 1990		Steel	N/A		CA4
WA-12-2	Water		H 1990		Steel	N/A		CA4

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Storage Tank Identification & Secondary Containment / Diked Areas

Columbus, GA Light Products Terminal

40 CFR Part 112 Appendix F 1.4.1 and 49 CFR 194

5/01

Tank No.	Product	(b) (7)(F)	Roof Type/ Year of Construction or Re-fabrication Date	(b) (7)(F)	Composition of Tank	Failure/ Cause	(b) (7)(F)	Containment Area Number
AA-1-4	Red Dye		Flat 2005		Steel/Welded	N/A		O/W Separator
AA-2-5	Lubricity		H		Steel	N/A		CA5

NOTE: Unless otherwise noted, all Terminal tanks are **Aboveground Tanks**

- Tank Number, tank identification (numbers or letters)
- Product stored in tank
- Shell Capacity – the volume equivalent of the design liquid level of a tank in gallons
- Normal Fill Level – the normal upper operating level of the tank in gallons
- Roof Type – C (cone roof); CF (covered floater); D (dome); H (horizontal above); IFR (internal floater roof); OFR (open floater roof); S (skid)
- Year of Construction or Refabrication Date in (parentheses)
- Tank dimensions diameter by height
- Composition of tank/construction material
- Failure/Cause, if there has been a failure in the history of the tank
- Maximum Capacity of Secondary Containment (diked area in gallons)

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AVERAGE DAILY THROUGHPUT

Storage tank and secondary containment information is detailed on the Storage Tank Identification & Secondary Containment/Diked Areas information pages found in Section H.

Section G has tank and secondary containment information on a plot plan of the Terminal. Information concerning MSDS for each product is located in the Terminal office and are readily accessible.

Product	Average Daily Throughput (Gallons)
Gasoline & Ethanol	235,584
Distillate & Transmix	66,568

TRANSFER VOLUMES

- **Barge Transfers:** 0
- **Pipeline Transfers:** 30,000 bbls
- **Truck Transfers:** 9,200 gallons

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Section I: Fire Prevention

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REGULATORY STANDARD:

OSHA 29 CFR 1910.39 Fire Prevention Plan
 29 CFR 1910.157 Portable Fire Extinguishers

GENERAL

Marathon Petroleum Company (MPC), Terminal, Transport, & Rail (TT&R) will ensure that potential fire hazards within our facility(s) are evaluated. This Fire Plan is intended to address evaluating and identifying potential fire hazards, providing proper exits, fire fighting equipment, emergency plans, written procedures, and communicating information concerning these hazards to employees.

WRITTEN PROGRAM

TT&R will review and evaluate this plan on an annual basis, when changes occur to 29 CFR 1910.39, or when facility operational changes occur that require revision. Effective implementation of this program requires support from all levels of management within this company. This written program will be communicated to all personnel that are affected by it. It encompasses the total workplace, regardless of number of workers employed or the number of work shifts. It is designed to establish clear goals, and objectives.

FACILITY EVALUATION

TT&R will evaluate this facility to determine where the potential for fuel and ignition sources is high and where ignition sources are present. When these two components are present the criteria required for designation as a high risk fire hazard area exists.

- **Information program** – Those areas/jobs meeting the criteria for a high risk fire hazard area or having a known potential to pose a hazard will be designated as high risk fire hazard areas. TT&R will inform exposed employees, by posting danger signs, conducting awareness training, or by any other equally effective means, of the existence and location of the hazard and the danger posed.
- **Equipment program** – Suitable fire protection equipment will be provided, worn, and used where machines, operations, or processes present a fire hazard. Any situation that could provide an ignition source, fuel, or a combination of these hazards will be reviewed. When information indicating limitations or precautions is received from the manufacturer concerning fire hazards associated with equipment used by or belonging to TT&R, they will be immediately transmitted to employees and care taken to see that such limitations and precautions are strictly observed.

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- **High risk fire hazard area/job listing.**

Area/Task	Ignition Source	Hazard	Current Control Method
Loading Rack	Smoking		No Smoking Permitted
	Hot Engines		Engine Shutdown While Loading
	Hot Work		Obtain Hot Work Permit
	Static		Transports Bonded & Grounded While Loading
Laboratory	Smoking		No Smoking Permitted in Lab
	Hot Work		Obtain Hot Work Permit
Tank Farm	Hot Work		Obtain Hot Work Permit
	Hot Engines		Obtain Hot Work Permit
	Smoking		No Smoking Permitted in Tank Farm
Marine Facility	Hot Engines		Obtain Hot Work Permit
	Hot Work		Obtain Hot Work Permit
	Static		Grounding
Office	Smoking		No Smoking Permitted in Office

MEANS OF EGRESS

All facilities belonging to MPC will meet as a minimum the basic building codes required for safety and health. This section details general fundamental requirements essential to providing a safe means of egress from fire and like emergencies.

- **Basic egress premise** – Every building or structure, new or old, designed for human occupancy owned by this company will be provided with exits sufficient to permit the prompt escape of occupants in case of fire or other emergency. The design of exits and other safeguards will be such that reliance for safety or life in case of fire or other emergency will not depend solely on any single safeguard. Where required, additional safeguards will be provided for life safety in case any single safeguard is ineffective due to some human or mechanical failure.
- **Design criteria** – All buildings or structures will be so constructed, arranged, equipped, maintained, modified, and operated as to avoid undue danger to the lives and safety of our employees from fire, smoke, fumes, or resulting panic during the period of time reasonably necessary for escape from the building or structure in case of fire or other emergency.

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- **Exit requirements** – All buildings or structures will be provided with exits of the type, number, location, and capacity appropriate to the individual building or structure, with due regard to the character of the occupancy, the number of persons exposed, the fire protection available, and the height and type of construction of the building or structure, to afford all occupants convenient facilities for escape. All exits will be so arranged and maintained as to provide free and unobstructed egress from all parts of the building or structure at all times when it is occupied. It is understood that no lock or fastening device designed to prevent free escape from the inside of any building will be installed except in mental, penal, or corrective institutions where supervisory personnel is continually on duty and effective provisions are made to remove occupants in case of fire or other emergency.
- **Egress marking** – Every exit will be clearly visible or the route to reach it will be conspicuously indicated in such a manner that every occupant of every building or structure who is physically and mentally capable will readily know the direction of escape from any point, and each path of escape, in its entirety, will be so arranged or marked that the way to a place of safety outside is unmistakable. Any doorway or passageway not constituting an exit or way to reach an exit, but of such a character as to be subject to being mistaken for an exit, will be so arranged or marked as to minimize its possible confusion with an exit and the resultant danger of persons endeavoring to escape from fire finding themselves trapped in a dead-end space, such as a cellar or storeroom, from which there is no other way out.
- **Illumination requirements** – In every building or structure equipped for artificial illumination, adequate and reliable illumination will be provided for all exit locations. Exit signs will be installed at the point of exit from the building.
- **Alarms** – In every building or structure of such size, arrangement, or occupancy that a fire itself may not provide adequate warning to occupants, fire alarm facilities will be provided where necessary to warn occupants of the existence of fire so that they may escape, or to facilitate the orderly conduct of fire exit drills.
- **Number of Exits** – Every building or structure, section, or area thereof of such size, occupancy, and arrangement that the reasonable safety of numbers of occupants may be endangered by the blocking of any single means of egress due to fire or smoke, will have at least two means of egress remote from each other, so arranged as to minimize any possibility that both may be blocked by any one fire or other emergency conditions.
- **Additional Provisions** – It is understood that compliance with these requirements will not be construed as eliminating or reducing the necessity for other provisions for safety of persons using a structure under normal occupancy conditions, or requiring or permitting any condition that may be hazardous under normal occupancy conditions.

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FIRE PREVENTION PLAN

The following elements, at a minimum, will be included in the fire prevention plan:

- **Workplace hazards** – The list in section **FACILITY EVALUATION** describes the major workplace fire hazards and their proper handling and storage procedures, potential ignition sources (such as welding, smoking and others) and their control procedures, and the type of fire protection equipment or systems which can control a fire involving them.
- **Smoking Guidelines**

Smoking, if permitted at a facility, is allowed only in designated safe areas that meet the designated requirements contained in the TT&R Smoking Policy.

 - Designated safe smoking areas must be clearly marked.
 - Designated safe smoking areas are indicated on the site diagram located in Section G and the Emergency Response Action Plan.
- **Manager Responsibilities** –
 - The terminal / facility manager is responsible for maintenance of equipment and systems installed to prevent or control ignitions or fires.
 - The terminal / facility manager is responsible for control of fuel source hazards.
- **Housekeeping for fire prevention** – Terminal managers will control accumulations of flammable and combustible waste materials and residues so that they do not contribute to a fire emergency. The housekeeping procedures will be included in the written fire prevention plan.
- **Training** –
 - TT&R will apprise employees of the fire hazards of the materials and processes to which they are exposed.
 - TT&R will review with each employee upon initial assignment those parts of the fire prevention plan which the employee must know to protect the employee in the event of an emergency.
- **Plan location** – The written plan will be kept in the workplace and made available for employee review.
- **Maintenance** – This employer will regularly and properly maintain, according to established procedures, equipment and systems installed on heat producing equipment to prevent accidental ignition of combustible materials. The maintenance procedures will be included in the written fire prevention plan.

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- **Equipment control devices** – Employees and supervisors will be aware of the specific type of control devices on equipment involved with combustible materials in the workplace and should make sure, through periodic inspection or testing, that these controls are operable. Manufacturers’ recommendations should be followed to assure proper maintenance procedures.

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PORTABLE FIRE SUPPRESSION EQUIPMENT

The requirements of this section apply to the placement, use, maintenance, and testing of portable fire extinguishers provided for the use of employees of TT&R.

- **General requirements** –
 - TT&R shall provide portable fire extinguishers and shall mount, locate and identify them so that they are readily accessible to employees without subjecting the employees to possible injury.
 - Only approved portable fire extinguishers shall be used to meet the requirements of this section.
 - This employer shall not provide or make available in the workplace portable fire extinguishers using carbon tetrachloride or chlorobromomethane extinguishing agents. Any employee finding such an extinguisher should report the find to the Safety Department.
 - TT&R shall assure that portable fire extinguishers are maintained in a fully charged and operable condition and kept in their designated places at all times except during use.
 - TT&R shall permanently remove from service all soldered or riveted shell self-generating soda acid or self-generating foam or gas cartridge water type portable fire extinguishers which are operated by inverting the extinguisher to rupture the cartridge or to initiate an uncontrollable pressure generating chemical reaction to expel the agent. Any employee finding such an extinguisher should report the find to the Safety Department.
- **Selection and distribution** – Portable fire extinguishers shall be provided for employee use and selected and distributed based on the classes of anticipated workplace fires and on the size and degree of hazard which would affect their use.
 - **Class A fires** – Class A fires are classed as ordinary combustibles or fibrous material, such as wood, paper, cloth, rubber and some plastics. Portable fire extinguishers for use by employees on Class A fires will be distributed so that the travel distance for employees to any extinguisher is 75 feet (22.9 m) or less.
 - **Class B fires** – Class B fires are classed as flammable or combustible liquids such as gasoline, kerosene, paint, paint thinners and propane. Portable fire extinguishers for use by employees on Class B fires will be distributed so that the travel distance from the Class B hazard area to any extinguisher is 50 feet (15.2 m) or less.
 - **Class C fires** – Class C fires are classed as energized electrical equipment, such as appliances, switches, panel boxes and power tools. Portable fire extinguishers for use by employees on Class C fires will be distributed so that the travel distance from the Class C hazard area to any extinguishing agent is 50 feet (15.2 m) or less.

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- **Class D fires** – Class D fires are classed as certain combustible metals, such as magnesium, titanium, potassium and sodium. Portable fire extinguishers or other containers of Class D extinguishing agent used by employees will be distributed so that the travel distance from the combustible metal working area to any extinguishing agent is 75 feet (22.9 m) or less.
- **Inspection, maintenance and testing** – This employer shall be responsible for the inspection, maintenance and testing of all portable fire extinguishers used by this company.
 - **Monthly inspections** – Portable extinguishers or hoses used in lieu thereof will be visually inspected monthly and documented in FTMS.
 - **Annual maintenance check** –
 - Portable fire extinguishers will be subjected to an annual maintenance check and documented.
 - TT&R shall record the annual maintenance date and retain this record for one year after the last entry or the life of the shell, whichever is less.
 - **Hydrostatic testing** – TT&R shall assure that hydrostatic testing is performed by trained persons with suitable testing equipment and facilities. Alternate equivalent protection will be provided when portable fire extinguishers are removed from service for maintenance and recharging.
 - **Hydrostatic Test records** - TT&R shall maintain and provide upon request, evidence that the required hydrostatic testing of fire extinguishers has been performed. Such evidence shall be in the form of a certification record which includes the date of the test, the signature of the person who performed the test and the serial number, or other identifier, of the fire extinguisher that was tested. Such records shall be kept until the extinguisher is hydrostatically retested at the specified time. Only the most current testing data shall be retained.
 - **Dry Chemical Extinguishers** – TT&R shall assure that stored pressure dry chemical extinguishers that require a 12 year hydrostatic test are emptied and subjected to applicable maintenance procedures every 6 years. Dry chemical extinguishers having non-refillable disposable containers are exempt from this requirement. When recharging or hydrostatic testing is performed, the 6 year requirement begins from that date.
 - **Hydrostatic Visual Inspection** – In addition to an external visual examination, an internal examination of cylinders and shells will be made prior to being tested or subjected to hydrostatic tests.
 - **Portable Extinguishers** – Portable extinguishers will be hydrostatically tested at the intervals required by the NFPA, except under any of the following conditions:
 - When the unit has been repaired by soldering, welding, brazing, or use of patching compounds.
 - When the cylinder or cell threads are damaged.

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- When there is corrosion that has caused pitting, including corrosion under removable name plate assemblies.
 - When the extinguisher has been burned in a fire.
 - When a calcium chloride extinguishing agent has been used in a stainless steel shell.
- **Training and education** – Where portable fire extinguishers for employee use are provided in the workplace, this employer will also provide an educational program to familiarize employees with the general principles of fire extinguisher use and the hazards involved with incipient stage fire fighting.
 - **Training intervals** – TT&R shall provide the education upon initial employment and at least annually thereafter. In addition, TT&R employees will be required to attend hands on fire training every four years.
 - **Locations/Types of Portable Fire Extinguishers.**
 - A list of the type and size of portable and wheeled fire extinguishing units available at this location are located in the FTMS system.
 - The placement of this equipment is shown on the facility diagrams in Section G.

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Foam Requirements for Fire Pre-Planning

Tank #	Roof Type	Product	Foam Solution Rate (GPM)	Foam Concentrate Required (Gallons) (a)	Supplemental Foam Hose Streams @ 50 GPM			Total Foam Solution Rate (GPM)	Total Foam Concentrate Required (Gallons) (a)+(b)
					Number of Handlines	Application Time	Supplemental Foam Concentrate Required (Gallons) (b)		
T-3	C	Transmix	14	1 % - 27 3 % - 27	1	10	1 % - 15 3 % - 15	64	1 % - 42 3 % - 42
15-1	CF	Ethanol	290	1 % - 565 3 % - 565	1	20	1 % - 30 3 % - 30	340	1 % - 595 3 % - 595
15-2	C	Fuel Oil	290	1 % - 145 3 % - 434	1	20	1 % - 10 3 % - 30	340	1 % - 155 3 % - 464
20-4	CF	Gasoline	452	1 % - 226 3 % - 679	1	20	1 % - 10 3 % - 30	502	1 % - 236 3 % - 709
20-7	CF	Gasoline	380	1 % - 247 3 % - 741	1	20	1 % - 10 3 % - 30	430	1 % - 257 3 % - 771
30-5	CF	Gasoline	616	1 % - 400 3 % - 1201	2	20	1 % - 20 3 % - 60	716	1 % - 420 3 % - 1261
30-6	CF	Gasoline	564	1 % - 367 3 % - 1100	2	20	1 % - 20 3 % - 60	664	1 % - 387 3 % - 1160
AA-1-4	Flat	Red Dye	1	1 % - 1 3 % - 2	1	10	1 % - 5 3 % - 15	51	1 % - 6 3 % - 17

- Notes:
- Roof Type – C (cone roof); CF (covered floater); D (dome); H (horizontal above); IFR (internal floater roof); OFR (open floater roof); S (skid)
 - Calculation based on NFPA 11, Type III over the top application rate of 0.16 gpm/sq.ft. for 65 minutes for flammable liquids, crude oils, or alcohols and 50 minutes for combustible liquids.
 - The Ethanol and Transmix tanks require an AR-AFFF foam concentrate
 - Foam Concentrate supply calculated utilizing both 1% and 3% foam proportioning for Hydrocarbons (Gasoline) and 3% for Ethanol & Transmix
 - Supplemental Foam lines per NFPA 11

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Marathon Refining Fire Fighting Resources

- Refineries must retain resources for their own protection at all times
- Availability of individual resources dependent upon the refinery's needs and mobilization capabilities at time of request

Illinois Refining (Robinson)

Facility	Marathon Petroleum Illinois Refining Division
Address	400 South Robinson Ave. Robinson, IL 62454
Emergency Contact Instructions	Call refinery security control at (618) 544-2121 and request a mutual aid response by fire brigade. Advise location, type of incident, and provide call back/contact phone numbers

Kentucky Refining (Catlettsburg)

Facility	Marathon Petroleum Kentucky Refining Division
Address	11631 US Route 23 Catlettsburg, KY 41129
Emergency Contact Instructions	Call refinery security at (606) 921-6282 and request a mutual aid response by fire brigade. Advise location, type of incident, and provide call back/contact phone numbers.

Michigan Refining (Detroit)

Facility	Marathon Petroleum Michigan Refining Division
Address	1300 South Fort Street Detroit, MI 48217
Emergency Contact Instructions	Call refinery security control at (313) 297-6229 and request a mutual aid response by fire brigade. Advise location, type of incident, and provide call back/contact phone numbers

Ohio Refining (Canton)

Facility	Marathon Petroleum Ohio Refining Division
Address	2408 Gambrinus Rd Canton, OH 44706
Emergency Contact Instructions	Call refinery scale house at (330) 478-5041 and request a mutual aid response by fire brigade. Advise location, type of incident, and provide call back/contact phone numbers

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Marathon TT&R Fire Fighting Resources

- Availability of individual resources dependent upon the terminal's needs and mobilization capabilities at time of request

Marathon Petroleum (Cincinnati)

Facility	Marathon Petroleum Cincinnati Terminal
Address	4015 River Road Cincinnati, OH 45204
Emergency Contact Instructions	Contact Terminal Operator at 513/451-0485 or MAPLINE at 1-877-627-5463

Marathon Petroleum (Bordeaux)

Facility	Marathon Petroleum Bordeaux Terminal
Address	2920 Old Hydes Ferry Road Nashville, TN 37218-3129
Emergency Contact Instructions	Contact Terminal Operator at 615/244-3670_or MAPLINE at 1-877-627-5463

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Section J: Discharge Detection Systems

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DISCHARGE DETECTION BY PERSONNEL

Description of Procedures and Personnel for Spill Detection

At the terminal, discharge detection is a combination of periodic and timely terminal inspections by terminal personnel combined with electronic operational alarms indicating potential storage tank overfills. In addition, during load rack and additive tank transfers, personnel monitor the transfer at the location and can immediately respond to any leakage. If a spill occurs, personnel will take appropriate action to respond as outlined below ('Description of Initial Response Actions') and Section B, including use of the Emergency Notification / Phone List and Form 100, Incident Response Notification Form that are located in Section B.

Facility Inspections

Daily workday inspections are performed by the Terminal Manager or a Designated Terminal employee. These inspections include a daily inventory check, and visual inspection of all tanks, exposed pipelines, and secondary containment areas. Any discrepancies found are immediately reported to the Terminal Manager.

See Section L for inspection criteria.

In the event of a release, Terminal personnel will refer to the incident mitigation procedures in the Action Plan.

Description of Immediate Response Actions

In the event of an actual release, terminal personnel will immediately respond as outlined in Section B of the FRP.

In addition the following actions must be taken as outlined in Section 1.7.1.2A to Appendix F to 40 CFR 112, **as long as the actions can be done safely:**

Oil Spill Response Immediate Actions

1. Stop the product flow.....Act quickly to secure pumps, close valves, etc
2. Warn personnel.....Enforce safety and security measures.
3. Shut off ignition sources.....Motors, electrical circuits, open flames, etc.
4. Initiate containment.....Around the tank and/or in the water with oil boom.
5. Notify MAPLINE (1-877-627-5463) who will contact the MPC Environmental Professional (EP) who will contact the NRC at 1-800-424-8802. In addition, the EP may notify the FOSC and SOSC, as appropriate
6. Notify, as appropriate OSRO, local officials, and neighbors.

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Emergency Response Information (Referenced)

Emergency response and emergency response contact information may be found in Section B, Evacuation Information in Section E, OSRO information in Section F, and storage tank information in Section H. All information contained in this plan may be cross referenced in the Table of Contents Section near the front of the plan.

AUTOMATED DISCHARGE DETECTION

Description of Automatic Spill Detection Equipment, Including Overfill Alarms & Secondary Containment Sensors.

Tank Gauging

Prior to receiving any product by truck or pipeline, a physical gauge will be taken of the receiving tank or tanks using a steel gauge tape to determine the remaining capacity of the tank. This reading is verified against the automatic sight gauge on the tank, but in no case will the automatic gauge be used solely for determining available space prior to filling. Gauging is conducted daily by means of tape gauge and/or visual readings of site gauges to determine product inventory.

Tanks

All product storage tanks are equipped with high level alarm systems which are designed to automatically notify pipeline operations via dedicated communication lines and Terminal personnel via an auto-dialer phone system, when a storage tank has more inventory than normally intended. This alarm condition would result in the immediate activation of steps defined in this plan.

Load Rack

All vehicle receiving product from the load rack are required to be equipped with emergency shut off devices to prevent overloading. The load rack is curbed to prevent oil from escaping.

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Section K: Training & Drills

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TERMINAL, TRANSPORT & RAIL (TT&R) TRAINING

MPC provides training for the Terminal and District Response Team members, which is appropriate for their assigned roles and responsibilities within their job classification. A job matrix defines job classifications with written descriptions for all training requirements for that job.

All Response Team members are trained to deal with spills, fires and other emergencies. Regulations include but are not limited to:

- 40 CFR Part 112 Oil Pollution Prevention (Facility Response Plan)
- 40 CFR Part 112 Oil Pollution Prevention (Spill Prevention Control and Countermeasures Plan)
- 40 CFR Part 262 Generator Regulatory Requirements and 40 CFR Part 265 Interim Status Facility Regulatory Requirements (RCRA Contingency Plan)
- 29 CFR Part 1910.38 Emergency Action Plan
- 29 CFR Part 1910.39 Fire Prevention Plan
- 29 CFR Part 1910.120 (q) Emergency Response to Hazardous Substances Release
- 29 CFR Part 1910.1200 Hazard Communication

TRAINING RECORDS

Terminal Transport & Rail maintains personnel training records on VTA Administrator, an electronic database in Findlay, Ohio. Additionally, each Terminal maintains a hard copy of training records for the employees assigned to that Terminal. Training records will be retained for a minimum of five years and as long as personnel have duties related to response.

DRILLS

MPC has chosen to participate in the National Preparedness for Responses Exercise Program (PREP) to meet the intent of the Oil Pollution Act of 1990. The PREP addresses exercises, drills, and notification requirements, which MPC follows. Each Terminal maintains logs and records that document drills and exercises. Drill documentation will be retained for a minimum of five years.

Contractors (OSRO, etc.)

Under conditions of the contract, contractors working for MPC will ensure that their employees have appropriate training to perform the expected duties. The contractor is responsible for maintaining all training records of their employees. MPC affirms compliance during contract review procedures and periodic auditing of contractor records.

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TERMINAL, TRANSPORT & RAIL PREVENTION TRAINING PROGRAM LEVEL I AND LEVEL II RESPONSE TEAMS

Prevention Training Requirements for the Terminal's Facility Response Plan for Facility Personnel

Level I Drills

Prevention Training Requirements (SPCC)

- Operations and maintenance of equipment
- Applicable pollution control laws
- Contents of facility's SPCC plan
- General facility operations

Training Elements for Facility Personnel

Demonstrate knowledge of:

- Agency the Terminal is regulated under (EPA, USCG, RSPA, State, etc...)
- Notification procedures and requirements for
 - External (Federal, State agencies, OSROs)
 - Internal
 - Utilizing Form 100
- Communication system used for notifications
 - Phone calls verses using MAPLINE
- Products transferred, stored and or shipped
 - Material Safety Data Sheets
 - Special handing procedures
 - Health and Safety Hazards
 - Spill procedures
 - Firefighting procedures
- Operational responsibilities and procedures for utilizing available Terminal equipment that may be used to mitigate or prevent an oil discharge
- Operational responsibilities and procedures to shut down affected operations (rack, a transfer, etc...)
- Operational responsibilities and procedures to follow in the event of a discharge, potential discharge, emergency involving the following equipment or scenario:
 - Tank Overfill
 - Tank Rupture
 - Piping or Pipeline Rupture
 - Piping or Pipeline leak, both under pressure and not under pressure
 - Explosion or Fire
 - Equipment Failure
 - Failure of Secondary Containment

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- Operational capabilities of the Terminal's contracted Oil Spill Removal Organization to respond to:
 - Average most probable discharge (small discharge)
 - Maximum most probable discharge (medium discharge)
 - Worst Case Discharge
- Names of Qualified Individual, and how to contact him
- Qualified Individual responsibilities and authority
- MPC TT&R organizational structure used to manage response actions for:
 - Command and Control
 - Public Information
 - Safety
 - Liaison with government agencies
 - Spill response operations
 - Planning
 - Logistics support
 - Finance
- Drills and exercise programs that meet the federal requirements
- Area Contingency Plan for the area in which the Terminal is located
- National Contingency Plan
- Roles and responsibilities (authority) of federal and state agencies in pollution response
- OSHA requirements for worker health and safety (29 CFR 1910.120)

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Prevention Training Requirements for the Terminal's Facility Response Plan for Facility Personnel / Spill Management Team

Level II Drills

Spill Management Team

The function of a Spill Management Team is to assist in the response of an oil spill. The organizational structure is based on the Incident Command System. Emergency response management activities are Command, Operations, Planning, Logistics and Administration and Finance.

Spill Management Team members will be trained according to their functional role within the Incident Command System.

Training Elements for the Spill Management Team

Demonstrate knowledge of:

- Agency which the Terminal is regulated under (EPA, USCG, RSPA, State, etc...)
- Notification procedures and requirements for:
 - External (Federal, State agencies, OSROs)
 - Internal
 - Utilizing Form 100
- Communication system used for notifications
 - Phone calls verses using MAPLINE
- Products transferred, stored and or shipped
 - Material Safety Data Sheets
 - Special handing procedures
 - Health and Safety Hazards
 - Spill procedures
 - Firefighting procedures
- Terminal Personnel operational responsibilities and procedures for use of Terminal equipment which may be used to mitigate an oil discharge
- Operational capabilities of the Terminal's contracted Oil Spill Removal Organization to respond to:
 - Average most probable discharge (small discharge)
 - Maximum most probable discharge (medium discharge)
 - Worst Case Discharge
- The responsibilities and authority of the Qualified Individual identified within the Facility Response Plan and within MPC TT&R's response organizations
- *Procedures for transferring responsibility for direction of response activities from shore to the vessel personnel.*

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- MPC TT&R organizational structure used to manage response actions for:
 - Command and Control
 - Public Information
 - Safety
 - Liaison with government agencies
 - Spill response operations
 - Planning
 - Logistics support
 - Finance
- The responsibilities and duties of the oil spill management team members within the MPC TT&R's organizational structure, in accordance with designated job responsibilities
- The requirements of oil spill management team members assigned role within the Incident Command System, as described within the Facility Response Plan
- Drills and exercise programs that meet the federal and state regulations as required by OPA
- Procedures of a post discharge review of the Facility Response Plan to evaluate and validate its effectiveness
- Area Contingency Plan for the area in which the Terminal is located
- National Contingency Plan
- Roles and responsibilities (authority) of federal and state agencies in pollution response
- Available response resources
- Ordering procedures to acquire OSRO resources, in accordance with designated job assignments
- Basic information on spill operations and oil spill clean-up technology including:
 - Oil containment
 - Oil recovery methods and devices
 - Equipment limitations and uses
 - Shoreline clean-up and protection
 - Spill trajectory analysis
 - Use of dispersants, in-situ burning, bioremediations
 - Waste storage and disposal considerations
- Hazard recognition and evaluation
- Site safety and security procedures
- OSHA requirements for worker health and safety (29 CFR 1910.120)
- Incident Command system and Unified Command System
- Public affairs, as applicable to designated job responsibilities
- Crisis management, as applicable to designated job responsibilities
- Personnel management, as applicable to designated job responsibilities
- Sensitive biological areas, as applicable to designated job responsibilities
- Procedures for directing the deployment and use of spill response equipment, as applicable to designated job responsibilities

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HAZWOPER EMERGENCY RESPONSE GUIDELINE

Emergency Responder Responsibilities and Knowledge Levels (Regulatory):

I. First Responder Awareness

Employees who are likely to witness or discover a hazardous material spill/release and who have been trained to initiate the emergency response sequence by notifying the proper authorities of the spill/release.

- A. Take no further action beyond notifying the authorities of a release
- B. Demonstrated competencies in the following:
 - 1. An understanding of what hazardous materials are, and the associated risks
 - 2. An understanding of the potential outcomes associated with hazardous material emergencies
 - 3. The ability to recognize the presence of hazardous material substance in an emergency
 - 4. The ability to identify the hazardous substance(s) if possible
 - 5. An understanding of the role of the First Responder Awareness Level in the employer's emergency response plan
 - 6. The ability to utilize the Department of Transportation's *Emergency Response Guidebook*
 - 7. The ability to recognize the need for additional resources, and the proper notifications required

II. First Responder Operations Level

Employees who respond to spills/releases or potential spills/releases as part of an initial response for the purpose of protecting nearby persons, property, and the environment from the effects of the release. They are trained to respond in a defensive fashion without trying to stop the spill/release. Their function is to contain the spill/release from a safe distance, keep it from spreading, and prevent exposures.

- A. Do not attempt to stop the release
- B. Receive eight hours of training or demonstrate competency and certification by the employer:
 - 1. Knowledge of basic hazard and risk assessment techniques
 - 2. Know how to select and use available personal protective equipment
 - 3. An understanding of basic hazardous material terminology

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4. Know how to perform basic control, containment, and/or confinement operations with equipment and personal protective equipment available within the employees' specific work area
5. Know how to implement basic decontamination procedures
6. An understanding of relevant site-specific standard operating procedures and termination procedures

III. Hazardous Materials Technician

Employees who respond to spills/releases for the purpose of stopping the spill/release assume a more aggressive role than a First Responder Operations Level in that they will approach the point of release in order to plug, patch, or otherwise stop the spill/release.

- A. Receive 24 hours of training equal to the first responder operations level
- B. Competency in the following, certified by the employer:
 1. Implement the employer's emergency response plan
 2. Know the classification, identification and verification of known and unknown materials by using field survey instruments and equipment
 3. Function within an assigned role in the Incident Command System
 4. Select and use proper PPE provided to the hazardous material technician
 5. Understand hazard and risk assessment techniques
 6. Perform basic control, containment and/or confinement operations within the capabilities of the resources and PPE available with their unit
 7. Understand and implement decontamination procedures
 8. Understand basic chemical and toxicological terminology and behavior
 9. Ability to understand termination procedures

IV. Hazardous Materials Specialist

Employees who respond with and provide support as needed

- A. Respond with and support Hazardous Materials Technicians
- B. Act as site liaison with Federal, State, local and other governmental authorities in regard to site activities
- C. Receive 24 hours of training equal to the technician level
- D. Competency in the following, certified by the employer:
 1. Implement the local emergency response plan
 2. Know the classification, identification and verification of known and unknown materials by using advanced survey instruments and equipment
 3. Knowledge of the state emergency response plan
 4. Select and use proper PPE provided to the hazardous materials specialist
 5. Understand in-depth hazard and risk assessment techniques
 6. Perform specialized control, containment and/or confinement operations within the capabilities of the resources and PPE available

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7. Determine and implement decontamination procedures
8. Have the ability to develop a site safety and control plan
9. Understand chemical radiological and toxicological terminology and behavior

V. On Scene Incident Commander

Employees who will assume control of an incident scene beyond the First Responder Awareness Level

- A. Receive 24 hours of training equal to the first responder operations level
- B. Competency in the following, certified by the employer:
 1. Know and be able to implement the employers incident command system
 2. Know how to implement the employer's emergency response plan
 3. Know and understand the hazards and risks associated with employees working in chemical protective clothing
 4. Know how to implement the local emergency response plan
 5. Know of the State Emergency Response Commission Plan (SERC) and the Federal Regional Response Team
 6. Know and understand the importance of decontamination procedures

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DOCUMENTATION

On completion of Level I, Level II, or Hazwoper training, the person conducting the training will complete the Employee Education Documentation Form, or the Terminal Hazwoper training form.

MPC shall maintain the following documents and records in Findlay, OH. Training documents and records are available to the terminal via the MPC company intranet.

- A. Duties for Level I and Level II personnel
- B. A written description of the type and amount of training
- C. Records that document that the training or job experience required has been given to and completed by Terminal personnel
- D. Records of personnel training for this Terminal are available at the Terminal and records of other personnel training are available at MPC's Findlay, Ohio office
- E. Records are available for inspection by any appropriate Federal or State Agency

PREP EXERCISE PROGRAM

In order to familiarize personnel with response and notification procedures and test response capabilities announced and unannounced drills will be conducted on a periodic basis. The drills or exercises will be completed and documented as outlined below.

Qualified Individual (QI) Notification Exercise

The purpose of a QI Notification Exercise is to ensure that the MPC QI, or designee, can be reached in a spill response emergency and carry out the required duties. Direct contact must be made by radio, pager, telephone, or fax. Annually, one QI Notification Exercise should be carried out during non-business hours. For terminals, the QI Notification Exercise will be initiated on a quarterly basis by the terminal manager or a designee at the terminal. The TM will document the QI Notification on TT&R Form 800. The form will be retained at the terminal for five years.

Equipment Deployment Exercise

The purpose of the exercise is to demonstrate the ability of Terminal personnel to deploy and operate Terminal owned and operated response equipment identified in the Facility Response Plan (If the Terminal has equipment).

Terminal equipment deployment drills will be conducted semi-annually. The unannounced annual drill may be credited toward one of the semi-annual drills. See Equipment Testing.

If the Terminal depends on a contracted OSRO for equipment deployment, OSRO equipment must be deployed annually and a letter documenting deployment provided to the Terminal.

Records of these exercises shall be maintained at the Terminal for at least five years.

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Spill Management Team Tabletop Drill

The purpose of the drill is to exercise the Terminal Response Team in managing a spill response.

The PREP Objectives for this exercise are to be completed each year. Every 3 years all components of the entire Facility Response Plan must be exercised. See Triennial Exercise of the Plan.

At least one spill management team tabletop drill in a triennial cycle would involve simulation of a worst case discharge scenario.

Records of these drills shall be maintained at the Terminal for at least five years.

Drill and Exercise Credit

The Terminal or Plan Holder should take credit for the above drills or exercises when conducted in conjunction with other exercises or during an actual spill response when the objectives are met, the response is evaluated, and a proper record is generated.

Terminal Exercise of the Plan

Components of the Plan that must be exercised at least once every three years include:

Organization Design

- Notifications
- Staff mobilization
- Ability to operate within the Response Management System described in the Facility Response Plan

Operational Response

- Discharge control
- Assessment of discharge
- Containment of discharge
- Recovery of spilled material
- Protection of sensitive areas
- Disposal of recovered material and contaminated debris

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Response Support

- Communications
- Transportation
- Personnel support
- Equipment maintenance and support
- Procurement
- Documentation

Internal Unannounced Exercises

Annually, each terminal must conduct one unannounced exercise. This is not a separate exercise, it just means that one of the required exercises must be conducted unannounced. This could be the QI Exercise, the Deployment Exercise, or the SMT Tabletop Exercise. In addition, the EPA allows use of an optional Emergency Procedures Exercise to fulfill the unannounced exercise requirement.

An unannounced exercise is where the participants do not have prior knowledge of the exercise. Response to an actual spill or other emergency should be taken as credit for the unannounced exercise.

Government-Initiated Unannounced Exercises

General – TT&R terminals and vessels may be directed by the Coast Guard or EPA to participate in an unannounced exercise. Coast Guard and/or EPA personnel may arrive unexpectedly and announce that the terminal or vessel has been selected to participate in a Coast Guard or EPA initiated unannounced exercise. Note that participation is mandatory, unless there is a specific condition on the vessel or at the terminal that may result in a safety hazard. The purpose of the exercise is to test the response preparedness of the terminal or vessel. The cost of the exercise will be borne by MPC TT&R. Records must be retained for a minimum of five years.

Description of the Exercise – The exercise will be a simulated small discharge necessitating mobilization of response equipment to the site and deployment and operation of the equipment. In general, the expectation is that boom will be deployed within approximately one hour, and that recovery devices will be available and in operation within two hours. Boom deployment up to 1,000 feet may be required or the agency may opt to have a lesser amount deployed. Note that if the terminal's approved FRP has less than 1,000 feet of containment boom, that lesser amount is the maximum amount of containment boom that must be deployed. Operation of recovery devices may be required or the agency may permit simulated operation. Adequate oil storage must be demonstrated for the small spill. Sufficient trained personnel must be available to deploy and operate the equipment. The exercise will last approximately four hours.

Exercise Expectation – The Coast Guard or EPA personnel will describe the hypothetical spill situation and then expect TT&R personnel to rapidly and effectively respond. The situation will be a small spill necessitating boom deployment and use of recovery devices for a spill of up to 2,100 gallons. Demonstration that recovered oil storage capacity is available to contain 4,200

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gallons will be required. The exercise will consist of proper notifications, boom deployment, oil recovery, demonstration of adequate storage capacity, and availability of adequate trained personnel. Proper notifications must be made, or simulated, as directed by the agency personnel – telephone notifications must be made to the TT&R QI, and National Response Center, at a minimum. If the approved TT&R FRP lists containment boom, TT&R personnel must deploy their own containment boom. If the approved plan does not list containment boom, TT&R personnel must call out their small spill OSRO to deploy boom. In either case, the small spill OSRO must be called to provide personnel and equipment for the recovery and storage devices. When TT&R personnel call the small spill OSRO, the OSRO should be advised that this is a Coast Guard or EPA unannounced exercise, and that safety of personnel is a major concern. The small spill OSRO must send adequate trained personnel to deploy and operate the equipment.

Safety – The responsibility for safety during the exercise rests with TT&R and the responding personnel from the OSRO. TT&R and OSRO personnel must comply with all regulatory safety requirements and must not act in an unsafe manner. Not observing regulatory safety requirements and/or operating unsafely will likely result in an unsatisfactory exercise evaluation.

Exercise Evaluation – The exercise will be evaluated by the agency conducting the exercise in accordance with their regulations. Basic requirements of the exercise are that the TT&R vessel or terminal demonstrates that the response plan can be implemented in a timely fashion, that response resources are available and in a functioning condition, that there are adequate response personnel, and that response personnel are adequately trained.

Government Area Exercise

The purpose of an area exercise is to exercise the entire response community in a particular area. The response community includes the federal, state, and local government and industry. This exercise is designed to exercise the government and industry interface for spill response.

Participation is not required if the Plan holder has participated in an Area Exercise within the preceding six years.

Evaluation of Drills and Exercises

Each drill or exercise shall be evaluated as outlined in the PREP Guidelines. MPC Form 800 contains the evaluation criteria from the PREP Guidelines and should be used to both document and evaluate the drill or exercise.

Documentation of Drills

A record of each drill or exercise conducted will be maintained on site at the Terminal and in the OPA Coordinator's office. A copy of the record will be sent to the OPA Coordinators, and the District Managers. This record is maintained for a minimum of five years. The records log at the Terminal must be readily accessible for inspection by any appropriate Federal or State Agency.

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The record will document the drill type and the participants including, Terminal personnel and any outside Oil Spill Removal Organization.

The IC will generate a record documenting the Level I/Level II Spill Management Team Table Top Drill with copies forwarded to Terminal Manager, and TT&R OPA Coordinators.

The Emergency Preparedness Group will generate a record documenting the Level III Responders and members of the CERT Team Spill Management Team Table Top Drill. Copies will be sent to the Terminal Manager, OPA Coordinator and District Managers.

Records of Area Exercises are to be maintained by the OPA Coordinators for at least five years from the date of the exercise.

MPC Response Organization Drill

MPC CERT Team, Level III Responders will conduct a drill every three years that exercises the entire components of the Facility Response Plan. This exercise may be conducted at any of the MPC locations. This drill will utilize the resources available to the Emergency Response Team, Levels I through III.

Upon completion, records verifying the occurrence of the drill will be sent to all MPC Division facilities to be retained in the drill log at each site. Although this drill may be held at just one location, because it is a corporate response (CERT Team) drill, it serves to fulfill the three-year requirement for all facilities.

Oil Spill Equipment Testing (For Terminals that have equipment)

All oil spill equipment will be tested and maintained per the National Preparedness for Response Exercise Program (PREP) guidelines. Annually, and generally at the time of a deployment drill, all listed equipment will be inspected for worthiness and accuracy with the listed inventory. This inspection will be part of the comprehensive training and standard maintenance program of the Terminal. The Terminal Manager or his Designated Alternate will document all inspections and any maintenance per the forms in Section L.

Note: The Oil Spill equipment that is to be **tested** is containment and/or deflective types of boom, skimmers, etc. All other equipment should be **inspected**.

Evacuation and Fire Exercises

Each Terminal shall schedule a drill for activating and exercising its fire control system and evacuation procedures. The system may consist of equipment and procedures or just procedures. The demonstration shall be conducted at least annually. The Terminal Manager or Designated Alternate an assigned company representative is responsible for coordinating the drill and notification of agencies and company representatives. The drill shall allow for the participation of local response agencies such as the fire department, LEPC or Coast Guard. Planning for any drill shall include invitation to participate to such local agencies and shall be concluded several days before the actual drill.

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Testing of Terminal equipment shall be conducted in accordance with local, state and federal regulations. In no case shall the interval between drills exceed one year. Each Terminal shall prepare a list of fire equipment, the required test interval for each piece and record the test dates.

Responsibility for Planning, Conducting, and Monitoring Drills

There are many MPC elements that contribute to planning, conducting, and monitoring drills, including documenting the drills. However, the person ultimately responsible for ensuring all aspects of the drill program is the Terminal Manager.

ABILITY TO IMPLEMENT PLAN, INCLUDING RESPONSE TRAINING AND PRACTICE DRILLS

The FRP serves as the basis for all training and drills - MPC personnel are not only trained in the FRP, but are expected to use the FRP in practice for both drills and actual response. As outlined in the FRP, MPC has developed an overall program to prepare terminal personnel for spill response and to respond to other emergencies. This program consists of the training and drills as outlined in FRP Section K "Training and Drills". Personnel are trained in accordance with the OSHA HAZWOPER Standard for spill response, as well as spill prevention in accordance with EPA requirements. Personnel are also trained for positions in the Incident Command System (ICS), and qualified for positions in a Spill Management Team following the guidance in the ICS System. Terminal personnel also participate in the National Preparedness for Response Exercise Program (PREP) in accordance with the PREP Guidelines. Drills are held at the terminal level annually, and at district, and corporate wide on a periodic basis. In addition to drills, MPC personnel may be asked to participate as responders in actual responses. Actual responses are evaluated and used to refine future training and drills. Thus, MPC personnel are prepared to respond as needed and are able to implement the FRP.

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ANNUAL EPA/USCG TRAINING REQUIREMENT

(Description of terminal personnel training to meet EPA regulatory requirements for the Annual Discharge Prevention Meeting and the Annual Personnel Response Training).

- **Annual HAZWOPER Refresher for Emergency Responder**
(Level 1 or Level 2 SMT Tabletop or Equipment Deployment Exercise)
[29 CFR 1910.120(q)(8)]

MPC has established that participation in a Level 1 or Level 2 Spill Management Team Tabletop Exercise or a MPC Equipment Deployment Exercise is **PARTIAL fulfillment** of the annual OSHA emergency response HAZWOPER training for MPC TT&R personnel. In addition, personnel must complete selected specific requirements as outlined in the MPC TT&R HAZWOPER Standard. Note that participation in an actual response is considered to be COMPLETE fulfillment of the annual OSHA HAZWOPER refresher training.

- **Annual EPA Discharge Prevention Meeting**
[40 CFR 112.7(f)(1)]

This annual training for terminal personnel should be a review of the methods for preventing spills at the terminal. The training should include a review of the terminal SPCC Plan and the means outlined therein to minimize or prevent spills. Recommended minimum training time is one hour and should include discussing overflow prevention, site drainage from diked and undiked areas, correct drainage procedures, and logging requirements for opening, monitoring, and closing drainage valves.

- **Annual EPA/USCG Terminal Personnel Response Training**
[40 CFR 112.7(f)(3) / 33 CFR 154.1050]

This annual training for terminal personnel should be a review of the spill response procedures at the terminal. The training should include a review of the Facility Response Plan and the spill response procedures therein. Recommended training time is one hour and should include notification procedures, initial spill containment, confinement, and control procedures, location and use of terminal spill response equipment, and information on initial spill response locations outside the terminal.

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Form 800 (Terminal PREP Exercise and Personnel Training Report)

Page 1 of 3
(Revised 2/04)

MPC Form 800		
Facility Name _____		Date of Exercise/Training _____
Preparer's Name _____		Preparer's Signature _____
A. PREP Exercises (Check all that apply)		
		USCG <input type="checkbox"/> EPA <input type="checkbox"/>
<input type="checkbox"/> QI Notification Exercise		
<input type="checkbox"/> SMT Tabletop Exercise		
<input type="checkbox"/> AMPD / Small Spill Scenario	<input type="checkbox"/> MPC Level One Exercise	
<input type="checkbox"/> MMPD / Medium Spill Scenario	<input type="checkbox"/> MPC Level Two Exercise	
<input type="checkbox"/> WCD / WCD Scenario		
<input type="checkbox"/> Equipment Deployment		
<input type="checkbox"/> Facility-Owned	<input type="checkbox"/> CO-OP Owned	<input type="checkbox"/> OSRO-Owned (If performed at MPC terminal)
<input type="checkbox"/> Emergency Procedure for Terminal		
<input type="checkbox"/> Unannounced	<input type="checkbox"/> Announced	
<input type="checkbox"/> Government-Initiated Unannounced Deployment Exercise (Attach Agency Evaluation)		
<input type="checkbox"/> USCG COTP _____	<input type="checkbox"/> EPA Region _____	
Exercise Objectives (Complete prior to Exercise)		
1. _____		
2. _____		
3. _____		
4. _____		
5. _____		
<input type="checkbox"/> Actual Incident (Describe below, list participants, and complete D. Lessons Learned)		
Written Description of Exercise or Actual Incident		
Participants (Check all that apply and list MPC personnel separately on OTIS Sign-in Sheet for Exercise Credit Purposes)		
<input type="checkbox"/> MPC Terminal Personnel _____	<input type="checkbox"/> MPC Area/District Personnel _____	
<input type="checkbox"/> Local Agencies (List) _____	<input type="checkbox"/> State Agencies (List) _____	
<input type="checkbox"/> Federal Agencies (List) _____	<input type="checkbox"/> OSRO _____	

ENV/RELPP/60C
TTM FRP (Form 800)

CUSTODIAN: Terminal
COPY: FRP & EPA

REVISED: 3/2005

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Form 800 (Terminal PREP Exercise and Personnel Training Report)

Page 2 of 3
(Revised 2/04)

MPC Form 800					
B. SMT Tabletop / Equipment Deployment Drill Evaluation Components					
Identify those components that were exercised during the PREP Exercise or Incident:					
1. Notifications		6. Containment		11. Transportation	
2. Staff Mobilization		7. Recovery		12. Personnel Support	
3. Unified Command		8. Protection		13. Equipment Maintenance	
4. Discharge Control		9. Disposal		14. Procurement	
5. Assessment		10. Communications		15. Documentation	
C. Exercise Evaluation - Accomplishment of Objectives					
1.					
2.					
3.					
4.					
5.					
D. Incident/Exercise Evaluation – Lessons Learned					
1.					
2.					
3.					
4.					
5.					
E. Terminal Personnel Training - (Attach List of Participants Using OTIS Sign-in Sheet)					
<input type="checkbox"/> Annual HAZWOPER Refresher for Emergency Responder (Level 1 or Level 2 SMT Tabletop) [29 CFR 1910.120(q)(8)]					
<input type="checkbox"/> Annual EPA Discharge Prevention Meeting [40 CFR 112.7(f)(1)]					
<input type="checkbox"/> Annual EPA/USCG Terminal Personnel Response Training [40 CFR 112.7(f)(3) / 33 CFR 154.1050]					
<input type="checkbox"/> USCG Facility Operations Person in Charge of Transfer Operations [33 CFR 154.710(e)]					
Notes:					
1. Submit participants for exercises and training on OTIS Sign-in Sheet.					
2. Maintain original completed copy of this form and participant list(s) for 5 years.					
3. Send a copy of this form and participant list(s) to OPA 90 Coordinator in TT&R					

ENV/RELPP/60C
TTM FRP (Form 800)

CUSTODIAN: Terminal
COPY: FRP & EPA

REVISED: 3/2005

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Form 800 (Terminal PREP Exercise and Personnel Training Report)

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1. Annual HAZWOPER Refresher for Emergency Responder (Level 1 or Level 2 SMT Tabletop or Equipment Deployment Exercise) [29 CFR 1910.120(q)(8)]

MPC has established that participation in a Level 1 or Level 2 Spill Management Team Tabletop Exercise or a MPC Equipment Deployment Exercise is PARTIAL fulfillment of the annual OSHA emergency response HAZWOPER training for MPC TT&R personnel. In addition, personnel must complete selected specific requirements as outlined in the MPC TT&R HAZWOPER Standard. Note that participation in an actual response is considered to be COMPLETE fulfillment of the annual OSHA HAZWOPER refresher training.

2. Annual EPA Discharge Prevention Meeting [40 CFR 112.7(f)(1)]

This annual training for terminal personnel should be a review of the methods for preventing spills at the terminal. The training should include a review of the terminal SPCC Plan and the means outlined therein to minimize or prevent spills. Recommended minimum training time is one hour and should include discussing overfill prevention, site drainage from diked and undiked areas, correct drainage procedures, and logging requirements for opening, monitoring, and closing drainage valves.

3. Annual EPA/USCG Terminal Personnel Response Training [40 CFR 112.7(f)(3) / 33 CFR 154.1050]

This annual training for terminal personnel should be a review of the spill response procedures at the terminal. The training should include a review of the Facility Response Plan and the spill response procedures therein. Recommended training time is one hour and should include notification procedures, initial spill containment, confinement, and control procedures, location and use of terminal spill response equipment, and information on initial spill response locations outside the terminal.

4. USCG Facility Operations Person in Charge of Transfer Operations [33 CFR 154.710(e)]

This training is to document the required training for those terminal personnel who are designated as Persons in charge of USCG-regulated transfers. The USCG Operations Manual should serve as the basis for the training. Specific training requirements include how to properly transfer product, how to respond in an emergency during transfer, knowledge of the Operations Manual, knowledge of transfer systems and operations, and spill notification and response procedures. This training is required before any terminal personnel are designated as Persons in charge. Although there is no periodic training requirement, MPC recommends an annual refresher be conducted with terminal personnel.

ENV/RELPP/60C
TTM FRP (Form 800)

CUSTODIAN: Terminal
COPY: FRP & EPA

REVISED: 3/2005

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Section L: Terminal Self Inspection, Response Equipment

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*Copies of recent log forms may be included at the end this section as necessary to demonstrate compliance. Official copies of the log forms are available on-line at any TT&R Facility or at MPC headquarters in Findlay, OH.

TERMINAL SELF INSPECTION

Inventory

The Terminal conducts a daily (workday) inventory of product, which serves as a check for potential leaks. The inventory in storage is compared and reconciled with the quantity of product received and the quantity of product shipped.

If the daily (workday) inventory indicates a discrepancy, the inventory and gauging will be rechecked. If the discrepancy is unresolved by a recheck, the discrepancy will be reported to the Terminal Manager.

Tank Farm Inspections – Light Products Terminals

All field-erected aboveground storage tanks (ASTs) are inspected on a regular basis in accordance with API-653 recommendations. All shop fabricated aboveground storage tanks (AST's) are inspected on a regular basis in accordance with API-653 or STI-SP001 standards. These include in-service and out-of-service inspections at intervals not to exceed those specified by the standards. In addition, routine walk-arounds and monthly inspections are performed.

The routine walk-arounds are performed visually by terminal personnel. All storage tanks are observed for signs of abnormal conditions which could affect the integrity of the tank and lead to a product release. Deficiencies are reported to the terminal manager and addressed as soon as possible.

The monthly inspections are also performed by terminal personnel and are documented on appropriate forms. All storage tanks are observed for signs of abnormal conditions which could affect the integrity of the tank and lead to a product release. Deficiencies are reported to the terminal manager and addressed as soon as possible. Records of these inspections are maintained in the terminal office for a period of three years, in accordance with the company's records management policy.

The 5-year in-service inspection is performed by an authorized inspector. The inspection includes ultrasonic thickness testing of the tank shell and a more thorough assessment of the condition of the tank, its appurtenances and the foundation. Deficiencies are reported to the terminal manager and addressed as soon as possible. Records of these inspections are retained in each tank's official file for the life of the asset, in accordance with the company's records management policy.

At an interval not to exceed 20 years, every field-erected AST is removed from service, cleaned, and a comprehensive internal and external inspection is performed in accordance with API 653. The tank is repaired or upgraded by a qualified tank contractor as required to bring the tank into API 653 compliance. Complete documentation of the inspection and repairs is included in the tank's official file for the life of the asset, in accordance with the company's records management policy.

If a tank is removed from service and cleaned outside the normal out-of-service inspection cycle, a visual inspection of the tank bottom will be performed. If significant corrosion is evident, non-destructive testing will be performed to assess the floor's condition. Other abnormal conditions affecting the tank's integrity will be addressed at that time. Records of these inspections are retained in each tank's official file for the life of the asset, in accordance with the company's records management policy.

Brittle Fracture

If a field-constructed aboveground container undergoes a repair, alteration, reconstruction, or a change in service that might affect the risk of a discharge or failure due to brittle fracture or other catastrophe, or has discharged oil or failed due to brittle fracture failure or other catastrophe, an evaluation of the container for risk of discharge or failure due to brittle fracture or other catastrophe will be completed.

Response Equipment Inspection

All oil spill response equipment is visually inspected as part of the monthly inspection done by the Terminal Manager or a designated Terminal employee.

See Form 601 (Facility Response Equipment List/Inspection Log) at the end of this section, for inspection criteria and documentation of inspection record.

Fire Equipment Inspection

Inspections of fire extinguishers are conducted monthly with detailed inspections conducted annually. All other fire equipment such as hoses, hydrants/monitors, foam system, fire buildings and equipment are inspected annually. If equipment is used, it will be inspected and repaired or replaced as necessary before being put back into service.

Records Retention

The Terminal maintains records of tank and secondary containment, response equipment, and fire extinguisher inspections for a five (5) year period.

MPC Form 601 (Facility Response Equipment Inspection Log) should be retained for a period of five (5) years.

Any of the above records may be kept electronically on the company network.

TERMINAL RESPONSE EQUIPMENT LIST

The following oil spill response equipment is available at the Columbus, GA Light Products Terminal:

Equipment	Location
Absorbent Pads (3 bundles)	Warehouse
Absorbent Boom	Warehouse
Tools	Warehouse

The equipment located at the Terminal is accessible within minutes.

This Terminal relies on contracted Oil Spill Response Organizations (OSROs) for all additional response equipment.

RESPONSE EQUIPMENT TESTING AND DEPLOYMENT DRILL LOG

- Last Inspection or Response Equipment Test Date: See the Response Equipment Inspection Log (Form 601) available online at the facility or a sample at the end of this section.
- Inspection Frequency: Monthly
- Last Deployment Drill Date: 2010
- Deployment Frequency: OSRO deploys equipment annually as indicated in the OSRO deployment letter at the end of Section F. If terminal has containment boom, deployments are performed bi-annually and recorded on PREP form 800 as outlined in Section F.
- Oil Spill Removal Organization Certification (if applicable): See Section F - USCG OSRO classification & OSRO Deployment Letter.

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SPCC PLAN INSPECTION RECORDS

The followings inspection records are to be maintained.

Inspection Record	Type	Method, Circumstance and Required Action
Stormwater Discharge Records	Written Periodic Records Location: Terminal Office	Prior to drainage of diked areas from facility, visual inspection will be conducted. Presence of oil will be noted and removed prior to any discharge.
Terminal Inspections	Written; Normal work day during normal terminal operating hours Records Location: Terminal Supervisor's office	Visual inspection conducted at least once on a normal work day basis during normal operating hours. Inspections are either recorded on inspection forms or deviations are documented as exceptions. Terminal inspections include: (a) visual observations of all dike areas for signs of deterioration, discharges or signs of oil accumulation within the diked area. All oil will be removed promptly; (b) visual observations of all external tank shells for evidence of corrosion, deterioration and/or discharge. All oil will be removed promptly; and (c) visual inspections of all aboveground piping within the facility. This inspection includes a visual assessment of flanges, gaskets, pipeline supports, expansion joints, etc. Abnormal observations will be communicated promptly with management to facilitate the proper response as expeditiously as possible.
API-653 External Inspections or STI-SP001 Tank Inspections Shop-fabricated Tanks	Written; Periodic Records Location: Terminal office	Follows regular schedule as deemed by API-653 or STI-SP001.
API-653 Tank Inspections Field –erected Tanks	Written; Periodic Records Location: Terminal office	Follows regular schedule as deemed by API-653 guidance. This inspection may also include integrity testing (which is accomplished via hydrotesting the tank prior to return to service) and inspection of tank's internal supports, floor and floating roof and seals, if applicable. Brittle fracture failure is assessed as deemed necessary by the Project Engineer in charge of the API-653 project following a careful review of the tank information presented.
API-570 – Piping Inspection Code: Inspection, Repair, Alteration, and Rerating of In-Service Piping Systems	Written; Periodic Records Location: Terminal office	Whenever a section of underground pipe is exposed for any reason, the appropriate inspection is conducted to assess the stability and integrity of the pipe. Additionally, new, reconstructed, modified, relocated and/or replacement pipe will be tested in accordance with the API-570 guidelines.
Lowermost drain and all outlets of tank car or tank truck before and after loading	Visual	Prior to loading and after loading any product into a tank car or tank truck, the transport driver/loader is instructed to visually inspect and ensure that all drains and outlets of the tank car or tank truck are properly closed and not leaking. The required inspection is communicated during driver/loader training and is included in the driver loading instructions presented to all drivers and/or loaders.
Liquid Level Sensing Devices	Test; Regularly Records Location: Terminal Supervisor's office	All tank level alarms and sensing devices are tested on a pre-determined schedule according to Company policy. Written documentation is maintained to ensure compliance with this requirement.

In addition, there are Facility Response Plan requirements for a monthly inspection of storage tanks and secondary containment. These inspections are performed and logged on MPC Form 600 and records maintained for five years in accordance with FRP requirements. (See the facility FRP Section K). There are also FRP requirements for response equipment and firefighting equipment inspections, which are performed and logged in accordance with FRP requirements with records maintained in accordance with the FRP for five years. See FRP Sections I and K for details.

Attention: Printed copies should be used with caution. The user of this document must ensure the current approved version of the document is being used.

Note: This sample Form 600 (Storage Tank and Secondary Containment/Diked Areas Inspection Log) is to fulfill regulatory purposes only. Please use the online form in FTMS for completion.

Tank Inspection - Form 600

Terminal:

Date:

Address:

	Tank #					
Tank Numbering/Identification						
Leaks						
Grounding						
Shell Condition						
Foundation						
Weed/Vegetation						
Drainage						
Interstitial Space(Qtr exc Fla-mthly)						
Water Draw						
Flow Direction and Marking Decals						
Thermal Relief Systems						
Piping and Pipe Supports						
Product Pumps and Motors						
Flange Piping Connections						
Mixers (Asphalt)						
Board Gauges (Asphalt)						
Insulation						
Stairway/Railings						
Sample Valves/Tank Valves						
Shell Vents/Gauge Hatch						
Roof Drain Sump						
Anti Rotation Device						
Gauge Tube						
Self Level Stairs						
Emergency Drains						
Open Floater Deck and pontoons						
Floating Roof Seal						
Intern Floater Pan, Legs (hatchvisual)						
Geodesic Dome Roof (Annual)						
Gauge Equipment						
Foundations and Piping Check						
Secondary Containment/Dike Berm						
Retention and Drainage Ponds						
Comments						
Tank Level Alarm Test						

This includes all information required in the EPA regulations 40 CFR Part 112 Appendix F 1.8.1.

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Legend

Task#	Short Description	Instructions
1	Tank Numbering/Identification	Tanks should be numbered in accordance with the company Tank Identification System.
2	Leaks	Check for leaks looking for: Drip marks, Discoloration, Puddles having spilled or leaked material, Corrosion, Cracks, and Localized Dead vegetation.
3	Grounding	Verify ground wires are attached to tank and ground rods.
4	Shell Condition	Look for signs of bulges or distortion in the shell plates and signs of corrosion.
5	Foundation	Check foundation for: Ringwall cracks, Tank perimeter settling, Discoloration, Puddles containing leaked/spilled material, Gaps between tank and foundation, Animal borings under foundation, Grade material/corrosion on chine, Damage by vegetation roots
6	Weed/Vegetation	There should be no weeds or vegetation within the first couple feet of the chine area.
7	Drainage	The grade should prevent water from accumulating around the base of the tank.
8	Interstitial Space(Qtr exc Fla-mthly)	Remove plug or cap on inspection port and use detection meter to determine if there is hydrocarbon presence. Also check for substantial water amount.
9	Water Draw	Verify water draw valve is not leaking and is in good condition.
10	Flow Direction and Marking Decals	All above ground piping should have adequate labeling information indicating flow direction, product decals, and origination/destination.
11	Thermal Relief Systems	Look for leaks around relief lines and valves.
12	Piping and Pipe Supports	Ensure supports and expansion couplers are positioned properly and bolts, nuts, rods are tight. Vent and drain valves plugged and handles removed. Ensure pipe coating is intact.
13	Product Pumps and Motors	Ensure items are properly supported, aligned, tightened, grounded, and guarded. Check for leaks and listen that check valve is working properly.
14	Flange Piping Connections	Ensure all bolts are present and properly sized, none are short bolted, connections are not leaking or seeping.
15	Mixers (Asphalt)	Check for leaks or visible problems with the mixer.
16	Board Gauges (Asphalt)	Verify there are no visual problems with the board gauge.
17	Insulation	Check to ensure the insulation is in good condition.
18	Stairway/Railings	Verify there is no corrosion where the stairway framing or handrails attach. Check for any loose handrails and treads.
19	Sample Valves/Tank Valves	Verify no signs of leaking or corrosion on or around taps, connections, fittings, or valves.
20	Shell Vents/Gauge Hatch	Verify vent screens are in place and not plugged. Verify hatches and lids are closed with seal gasket in place and hinge in good condition.
21	Roof Drain Sump	Verify sump is clean with no signs of product. Verify no corrosion on roof, sump, or sump valves.
22	Anti Rotation Device	Verify floating roof has not rotated out of device.
23	Gauge Tube	Verify tube is plumb, attached, and not damaged.
24	Self Level Stairs	Verify ladder is on tracks, treads are not loose, down bolts are in place, free of corrosion, and handrails not loose, damaged, or corroded.
25	Emergency Drains	Verify emergency drains have a vapor emission control device installed.
26	Open Floater Deck and	Check pontoons for presence of hydrocarbons with detection meter. Verify there are

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Task#	Short Description	Instructions
	Pontoons	no problems with the deck.
27	Floating Roof Seal	Check seal condition for no gaps, holes, openings, or tears (visual via hatch for IFRs).
28	Intern Floater Pan, Legs(hatchvisual)	Check for visible product on roof, damage, seal problems, missing or displaced column, ladder penetration cover materials, bonding cables attached.
29	Geodesic Dome Roof (Annual)	Inspect that no gasket is loose, bolts or panels missing from structure, and nothing has shifted.
30	Gauge Equipment	Verify there are no signs of damage to the equipment.
31	Foundations and Piping Check	Tank, Tank Foundations and Piping - Check For: Droplets of stored material, Discoloration, Corrosion, Bowing of pipe between supports, Evidence of stored material seepage from valves or seals, Localized dead vegetation. Make comments as needed.
32	Secondary Containment/Dike Berm	Level of precip in dike/avail capacity, Drainage valve operation, Permeability of Dike/berm/floor area, Debris, Erosion, Location/Status of pipes-inlets-drainage beneath tanks, Cracks, Discoloration, Spilled/leaked material presence, Corrosion, Valve condition
33	Retention and Drainage Ponds	Retention and Drainage Ponds - Check For: Erosion, Available capacity, Presence of spilled or leaked material, Debris, and Stressed vegetation. Make comments as needed. presence Corrosion, Valve condition
34	Comments	If you need to make a comment, select status of comment, then type in comments box.
35	Tank Level Alarm Test	Refer to Tank Alarm Test Procedure for details

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Note: This sample Form 601 is to fulfill regulatory purposes only. Please use the online form in the PREP database for completion.

Form 601 (Facility Response Equipment List/Inspection Log)

(40 CFR Part 112 Appendix F 1.3.2 & 1.8.1.2 – Retain for 5 years)

Page 1 of 3
03/03

Terminal Name Columbus, GA Light Products **Date** _____

1. Skimmers/Pump

Type	Model	Year	Capacity	Recovery	Storage	Date Fuel Change	Inspection Date/Initials Comments

Comment as appropriate:

Is all equipment accessible? _____ Any correction needed? _____
 Are all items operational? _____ Any repairs needed? _____
 Last test date or last use date? _____
 Shelf life and expected replacement date? _____

2. Boom (Operable ONLY)

Type	Model	Year	Size (length)	Containment Area	Storage Location	Inspection Date/Initials Comments

Comment as appropriate:

Is all boom accessible? _____ Any correction needed? _____
 Is all boom deployable? _____ Any repairs needed? _____
 Last test date or last use date? _____
 Shelf life and expected replacement date? _____

3. Dispersant Chemicals Stored (In Shelf Life ONLY)

Type	Amount	Date Purchased	Treatment Capacity	Storage Location	Inspection Date/Initials Comments

Comment as appropriate: Are dispersants accessible? _____ Are dispersants ready for use? _____ Shelf life/expected replacement date _____

Were appropriate procedures used to receive approval for use of dispersants in accordance with the NCP (40 CFR 300.190) and the Area Contingency Plan (ACP), where applicable _____? Name and State of On-Scene Coordinator (OSC) authorizing use _____

Date _____

ENV/RELPP/60C
TTM FRP (Form 601)

CUSTODIAN: Terminal
COPY: FRP & EPA

REVISED 3/2005

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Form 601 (Facility Response Equipment List/Inspection Log)

(40 CFR Part 112 Appendix F 1.3.2 & 1.8.1.2 – Retain for 5 years)

Page 2 of 3
03/03

4. Dispersant Dispensing Equipment (Operable ONLY)

Type & Year	Storage Location	Response Time (minutes)	Inspection Date/Initials Comments

Comment as appropriate: Is all equipment accessible? _____ Are all items operational? _____ Any repairs needed? _____ Last test date or last use date? _____ Shelf life / expected replacement date? _____

5. Sorbents Pads, Sorbent Booms

Type	Year Purchased	Amount	Absorption Capacity	Storage Location	Inspection Date/Initials Comments

Comment as appropriate: Are sorbents accessible? _____ Are sorbents ready for use? _____ Shelf life / expected replacement date? _____

6. Hand Tools

Type of Tool	Age	Quantity	Storage Location	Inspection Date/Initials Comments

Comment as appropriate: Are hand tools accessible? _____ Are hand tools in good repair? _____ Any repairs needed? _____ Shelf life / expected replacement date? _____

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CUSTODIAN: Terminal
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Form 601 (Facility Response Equipment List/Inspection Log)

(40 CFR Part 112 Appendix F 1.3.2 & 1.8.1.2 – Retain for 5 years)

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03/03

7. Communication Equipment (Operable ONLY) (Radios/Cellular Phones)

Type of Device	Age	Quantity	Storage Location	Inspection Date/Initials Comments

Comment as appropriate:

Is all equipment accessible? _____ Any correction needed? _____
 Are all devices operational? _____ Any repairs needed? _____
 Last test date or last use date? _____
 Shelf life / expected replacement date? _____

8. Fire Fighting and Personnel Protective Equipment (Operable ONLY)

06/00

Type & Year	Age	Quantity	Storage Location	Inspection Date/Initials Comments

Comment as appropriate:

Is all equipment accessible? _____ Any correction needed? _____
 Is all equipment operational? _____ Any repairs needed? _____ Last
 test date or last use date? _____
 Shelf life / expected replacement date? _____

9. Other (Heavy Equipment) Boats and Motors (Operable ONLY)

Type & Year	Age	Quantity	Storage Location	Inspection Date/Initials Comments

Comment as appropriate:

Is all equipment accessible? _____ Any correction needed? _____
 Is all equipment operational? _____ Any repairs needed? _____ Last
 test date or last use date? _____
 Shelf life / expected replacement date? _____

ENV/RELPP/60C

CUSTODIAN: Terminal

REVISED 3/2005

TTM FRP (Form 601) COPY: FRP & EPA

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Section M: Sampling & Disposal Information

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RCRA CONTINGENCY PLAN OUTLINE

MPC Terminals may/may not be RCRA hazardous waste generators.

A cross reference for the RCRA Contingency Plan is located in the Table of Contents section.

This disposal plan is in accordance with federal regulations in 40 CFR 260-265.

SAMPLING / ANALYSIS

The Terminal Manager (Emergency Coordinator) with support from the Environmental Professional will coordinate activities to ensure proper sampling and material characterization of operational generated waste material and material generated as the result of a spill, fire, etc. This will be done by either testing by a qualified lab or based on generator's knowledge of the material (product) to determine if the material is hazardous waste or not. Environmental Professionals have been trained to properly implement the waste characterization regulations. Further, the Waste Management Plan outlines the hazardous constituents to be tested for terminal waste streams.

DISPOSAL PLAN

Recovering, Reusing, Decontaminating, or Disposing of Materials

To ensure proper storage of waste materials, all waste materials must be segregated by type of material. Proper segregation will facilitate proper disposal/recycling/treatment management.

Solid materials generated during a spill or fire event would typically be contaminated soils, contaminated organic debris, contaminated trash, contaminated equipment and contaminated worker clothing and personal protective equipment (PPE).

Recovered Product

- Liquid material generated during a spill or fire event, such as recovered product, could be temporarily stored in vacuum trucks, frac tanks, trailers, or any available tankage at the Terminal. Depending on the amount of liquids, a barge may be used to temporarily store liquids.
- Water and product mixtures will be sent to recovery reprocessing at a refinery or third-party vendor, or the material may be sent to a local municipal waste water treatment plant for treatment and processing.

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Contaminated Soil

- Contaminated soils could either be excavated and stored on lined temporary storage areas, hauled off in dump trucks or left in place for in-situ soil remediation.
- Excavated contaminated soil may be sent off site for disposal or some form of treatment. Soils not excavated may be treated by in-situ treatment or bioremediation.

Contaminated Equipment and Materials

- To ensure public safety, waste containers should be stored at least 50 feet from the fence line whenever possible.
- Operationally generated solid waste materials are usually temporarily stored in 55-gallon drums, lined roll off dumpsters or dump trucks.
- Operationally generated liquid waste materials are usually temporarily stored in vacuum trucks, frac tanks, or liquid transports.
- Contaminated Terminal equipment such as piping, pumps, parts, valves, shovels, tools, etc., will be decontaminated and reused if possible,(or non-hazardous disposal or scrap metal recycling) and if not possible will be temporarily stored in lined drums or lined roll off dumpsters before being sent off site for disposal or recycling.
- Organic debris (limbs, leaves, etc.) could either be stored on a lined temporary storage area or lined roll off dumpsters. Inorganic trash could be temporarily stored in lined roll off dumpsters.
- Contaminated organic debris, depending on the material, will be sent off site for treatment and disposal.
- Contaminated inorganic debris, depending on the material, will be sent off site for treatment and disposal.

Personnel Protective Equipment

- Contaminated worker clothing and PPE will be decontaminated and reused if possible, and if not possible, will be temporarily stored in lined drums or lined roll off dumpsters.
- Worker clothing and PPE will be decontaminated if possible, or sent offsite for treatment if hazardous or non-hazardous disposal, as necessary.

Decontamination Solutions

- Other liquids that could be generated during an event are decontamination solutions. Decontamination solutions could either be temporarily stored in 55-gallon drums, frac tanks or vacuum trucks.
- Spent solutions may include oily water or non-oily rinse water. The two streams should be kept separately or for small amounts can be mixed. These solutions can be kept in frac tanks, tank trucks, drums, or PVCs farm tanks.

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Absorbents

- Contaminated spill response equipment will be decontaminated and reused if possible, and if not possible, will be temporarily stored in lined drums or lined roll off dumpsters.
- Contaminated absorbents and spill response generated materials will be sent offsite for proper recycling or disposal.
- Absorbents can be kept separately and in some cases even squeezed out and reused. Used absorbents can be stored in lined roll offs boxes that can be covered to prevent water intrusion.

Spent Chemicals

- Other liquids could be generated during an event such as fire fighting foam. Fire fighting foam could either be picked up with a vacuum truck or washed to the oil water separator, as it is a non-hazardous material.
- It's unlikely that other chemicals would be used in a spill in inland waters. If chemicals are used the means of storage and disposal of the spent chemical must be determined before use.

COMPLIANCE WITH FEDERAL, STATE & LOCAL REGULATIONS

MPC Terminal waste management is governed by the solid waste regulations of the State Environmental Protection Division in the state in which the Terminal operates and the EPA (40 CFR Part 260-265). These regulations outline methods and procedures for proper waste management, transportation and disposal/recycling/treatment. Any disposal will be conducted in full accordance with Federal, State, and Local regulations.

Personnel are directed to refer to the TT&R Waste Management Plan for additional detail regarding any content contained in this Plan.

TRANSPORTATION & DISPOSAL PERMITS

All waste transported for disposal/recycling/treatment must be properly labeled and accompanied with the proper paperwork.

All waste shipments are tracked by either a bill of lading, a non-hazardous manifest, or a RCRA Uniform Hazardous Waste Manifest.

All disposal/recycling/treatment will be done by companies that have obtained the **necessary** permits to accept and treat that type of waste.

Further, any such recycling and disposal companies will have been vetted and approved for use by the Corporate Environmental Support Group's 'Waste Management Vendor Approval Program'.

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Following is a listing for hazardous and non-hazardous disposal firms, transporters, and container suppliers that the Terminal is currently using for operational generated wastes. In response to event generated wastes MPC would use additional firms that are permitted to recycle, treat and or dispose of hazardous waste.

DISPOSAL / TRANSPORTERS

The Terminal currently uses the below listed firms for operational generated waste materials. Note: The Corporate 'Waste Management Vendor Approval Program' (WMVAP) database must be queried for approved waste facilities before arranging for recycling/disposal.

Disposal Firms

Georgia Petroleum, Inc.
1612 James P. Rogers Circle
Valdosta, GA 31501
229/244-9110

Aaron Oil, Inc.
316 Bel Air Boulevard
Mobile, AL 36606
229/244-9110

Transporters

Holland Oil Company, Inc.
1101 W. Hill Avenue
Valdosta, GA 31501
912/244-9110

Aaron Oil Company, Inc.
316 Bel Air Boulevard
Mobile, AL 36606
251/479-1616

Florida Rock & Tank Lines
5241 Miller Road
Columbus, GA 31908
706/563-5671

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VENDORS THAT PROVIDE WASTE CONTAINER SERVICES

Waste Management of GA
1189 Henrico Road
Conley, GA 30288
404/361-1182

Sandman, Inc.
4900 Warm Springs Road
Columbus, GA 31909
706/322-6776

NOTE: In case of a spill incident, any available tank can be used for temporary storage of recovered product.

RECORDS, DISPOSAL FORMS and DISPOSAL STATUS TRACKING

Weekly paper waste inspections are maintained at the facility. Electronic waste disposal records are maintained in the OIS system which is accessible to all Marathon employees, and paper copies of waste shipping documentation are maintained at the facility.

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Section N: Communications

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COMMUNICATION

Additional Communications Equipment could be obtained from:

- Radio Shack (Radios, Fax Machine, Phones)
3095 Manchester Expressway
Columbus, GA 31909-6527
706/324-1791
- (Radios, Fax Machine, Phones)
3001 Airport Thrwy.
Columbus, GA
- Radio Wholesale Marketing (Radios)
3132 Mercury Drive
Columbus, GA 31906-1713
706/561-7000
- Rental Service Corporation (Small Tools)
2400 Whittlesey Road
Columbus, GA 31909-3008
706/327-7407

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LINES OF COMMUNICATION

Spill response and planning communications between MPC personnel and responsible government agencies on the Federal Regional Response Team (RRT) will occur formally between the MPC Incident Commander and the Federal On-Scene Coordinator (EPA or USCG).

COMMUNICATIONS EQUIPMENT

Radios

Field communications during a spill response will be via purchased or rented radios. The Terminal has no intrinsically safe hand-held radios.

Telephones

Telephones available during a spill response are as follows:

- Incoming phone lines to Terminal
 - Office: 706/561-0121
 - Additional Numbers: 706/561-0122
 - 706/563-2064
 - 709/561-9032
- Fax: 706/561-6883
- Modem: This Terminal is connected into the Findlay Wide Area Network (WAN).

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CERT COMMUNICATION PLAN & EQUIPMENT

Marathon currently owns and maintains a minimum initial response communications equipment package under the current CERT Program. This equipment, stored in Findlay, OH, is available to Marathon and MPC domestic operations any time through a request for assistance from CERT. The plan is modular in nature to allow a range of response activity from specific equipment/personnel requests needed for small events to the broader commitments required for a long-term major event.

On-site set-up and operation of the initial equipment package for a command post can generally be expected within 8 hours or less of a request, depending on location, aircraft availability, weather, etc. The initial package is made up of the following main equipment items.

- 2 VHF repeaters and 36 VHF, intrinsically-safe, handheld radios
- 1 UHF repeater and 3 UHF, intrinsically-safe, handheld radios
- 1 link repeater to link the UHF and VHF systems together, if necessary
- HF SSB radio
- Personal cell phones

The following can be available in approximately 48 hours or less.

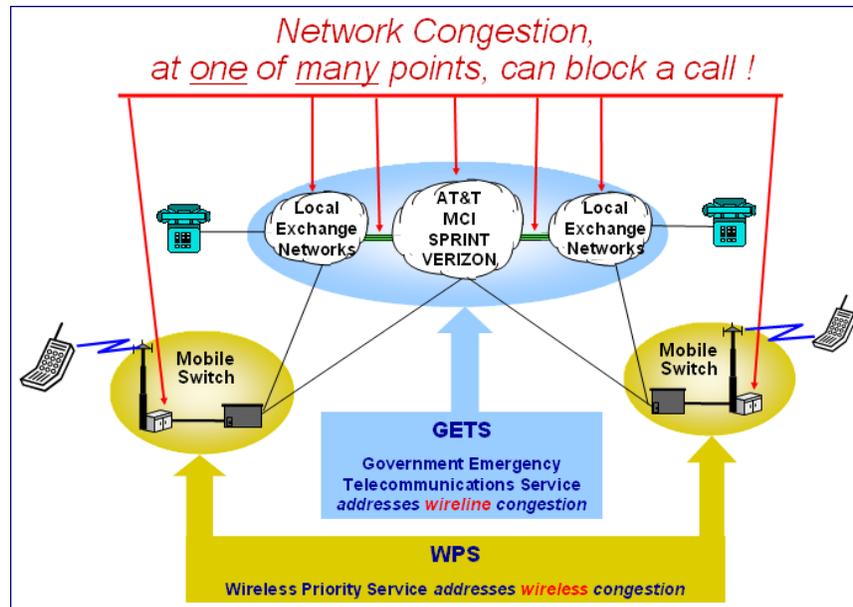
- PBX (telephone system) capable of supporting 16 outside lines and 56 extensions
- LAN system consisting of an NT server, a switch, and 4 hubs capable of supporting up to 40 connected devices (*e.g.*, laptop computers, scanners, laser and poster printers, etc.)
- FAX machines

In addition, in the event of a major incident in a remote location, the Company has plans, procedures, and contacts to contract supplemental communications equipment, personnel resources, and portable office trailers to provide a complete remote operational command post within 72 hours after a request to CERT, provided sufficient phone lines are available.

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NATIONAL COMMUNICATIONS SYSTEM - GETS/WPS

The National Communication System (NCS, <http://www.ncs.gov/>) is a White House sponsored program within the Department of Homeland Security. The NCS offers National Security and Emergency Preparedness (NS/EP) communications services during national emergency or crisis where network congestion decreases the probability of completing a call. As part of the critical infrastructure, Petroleum companies participate in these programs. We would get the lowest priority in the NCS systems but it would still be at a higher level than the general public and most businesses. The NCS provides two services which are of interest to us – GETS & WPS.



Government Emergency Telecommunications Service (GETS) <http://gets.ncs.gov>. GETS provides priority in establishing voice calls over the land line networks.

The GETS system provides emergency access and priority processing in the public switched wired network, from any phone. It can be used for local and long distance calls. GETS numbers can be shared in an emergency so someone with a GETS number could provide it to other key personnel. A cell phone can be used to access the GETS system assuming a user can get thru the cellular origination point. The WPS system below may help with that.

Wireless Priority Service (WPS) <<http://wps.ncs.gov>> - Provides priority in establishing voice calls using wireless or cellular services.

The WPS system provides priority network access to the wireless network from specifically identified cell phones. WPS works in a similar manner to GETS but focuses on wireless calls. The user calls *272 to initiate a call. This system addresses wireless congestion at the call origination and termination locations by giving the user "cell tower priority".

The HES&S Environmental Compliance department is responsible for coordinating TT&R's use of these systems. They keep the GETS/WPS records correct in terms of who holds what position

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and what their contact numbers are.

GETS

Northern Light Products - District Manager
 Marine Transportation Manager
 Asphalt & Southern Light Products District Manager
 Transport Operations Manager
 HES&S Manager
 Terminal Services & Rail Manager

GETS & WPS

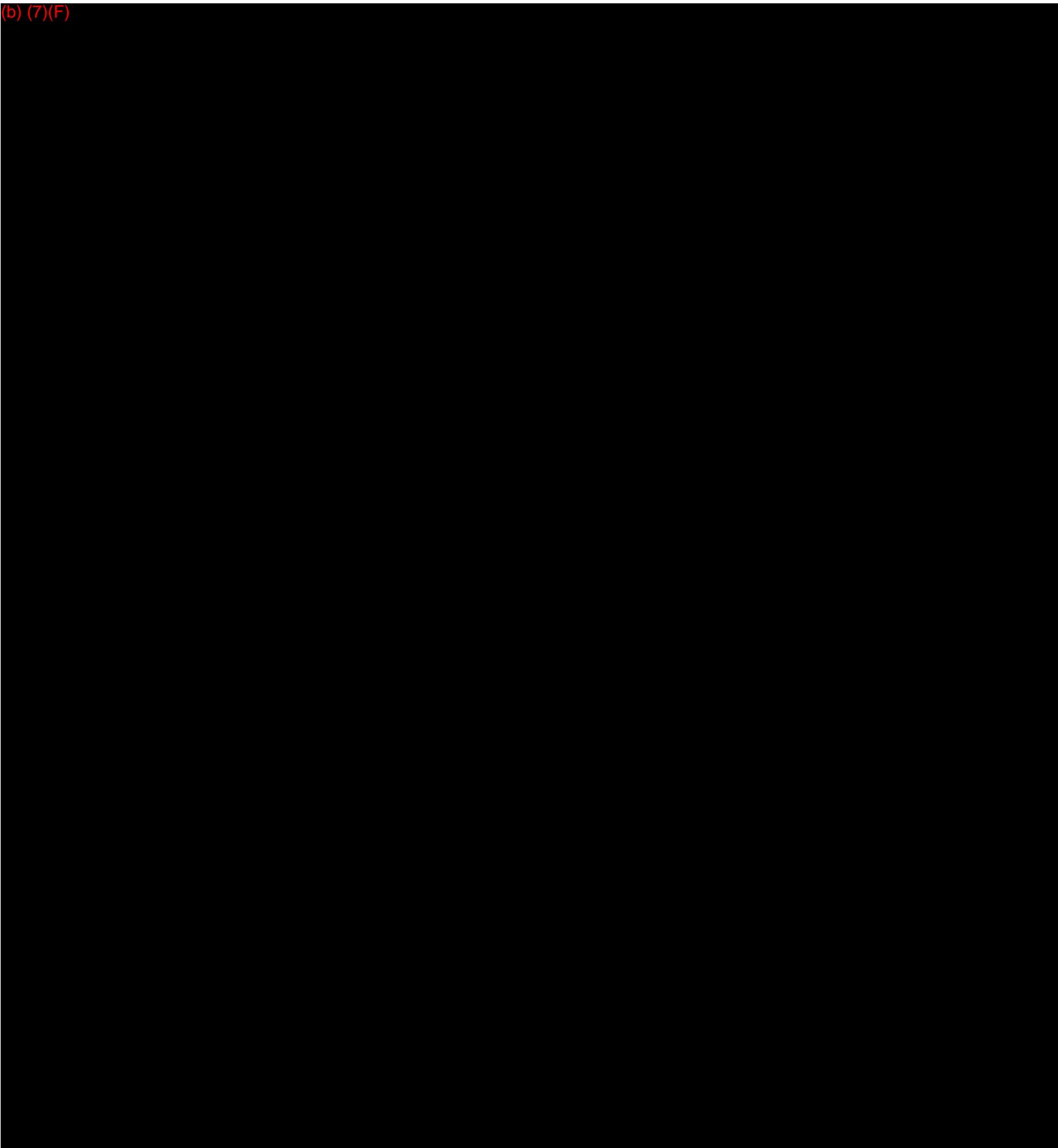
Hurricane Coordinator - Atlanta Area Manager
 Tanker Operations & Vetting Manager
 Tampa Terminal Manager
 Ft. Lauderdale Terminal Manager
 Garyville Terminal Manager

The people in the roles above get regular reminders from the OpsEnvironmental system to make familiarization calls to the system. The calls should only be made to the special phone number shown on the card and referred to in the email.

Description	: Test your GETS emergency phone card.-2007/07/15 : NCS system : : Responsible Person: Every GETS cardholder : : Make a GETS call Periodically to maintain proficiency in using GETS. : : With your GETS card handy.... : (1) Dial the GETS system at 1-710-627-4387 : (2) Enter the PIN number from the front of your card : (3) Enter the destination phone number 703-818-3924 : (4) Wait until the recording completes or starts over. : : Please contact your EPG Coordinator with any questions.
Due Date	2007-07-15 00:00:00
Number of Days Left	0
Model	[* National Communication System
Tickler	Test your GETS emergency phone card.-2007/07/15
Triggered By	Test your GETS emergency phone card.-2007/07/15

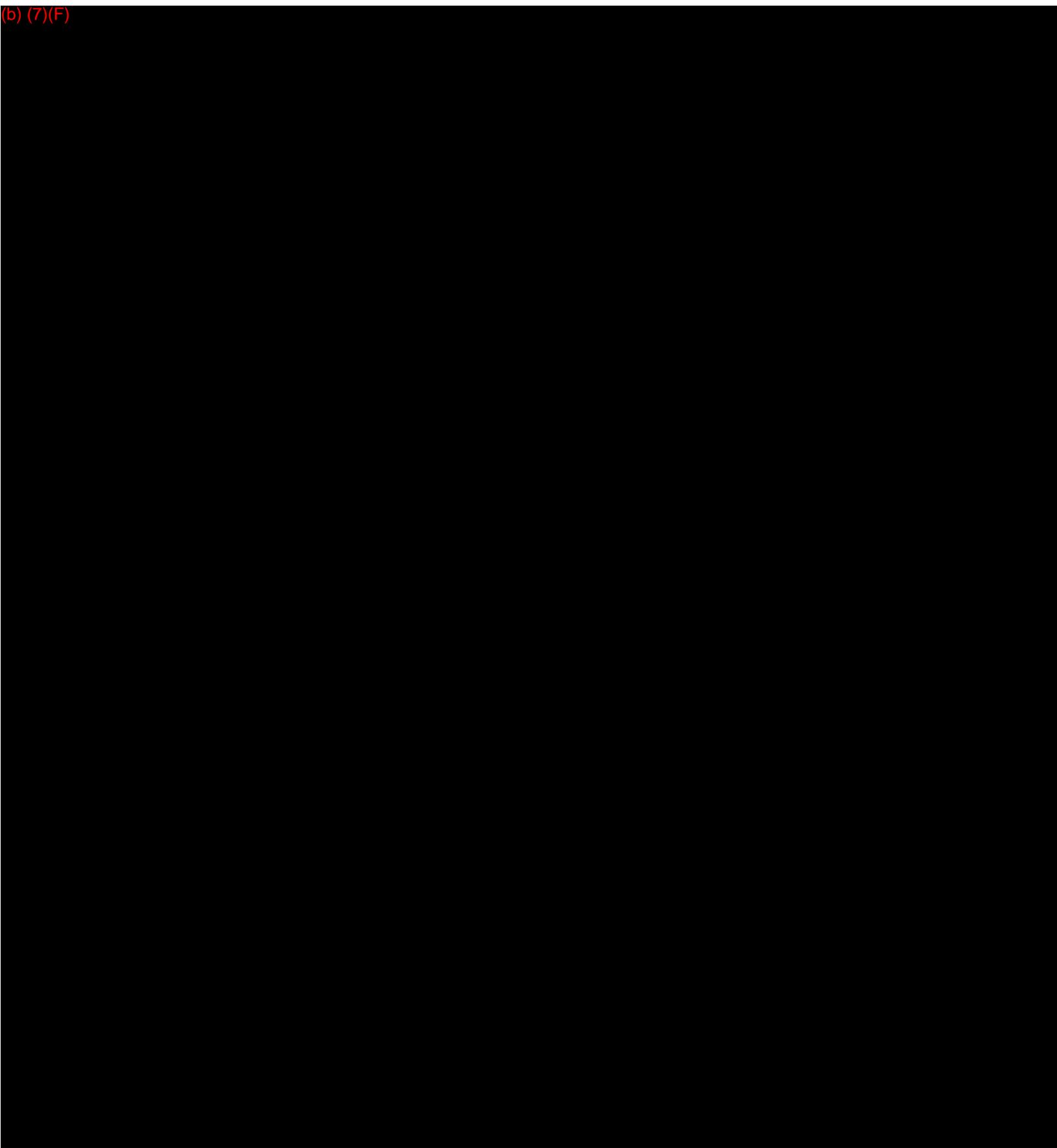
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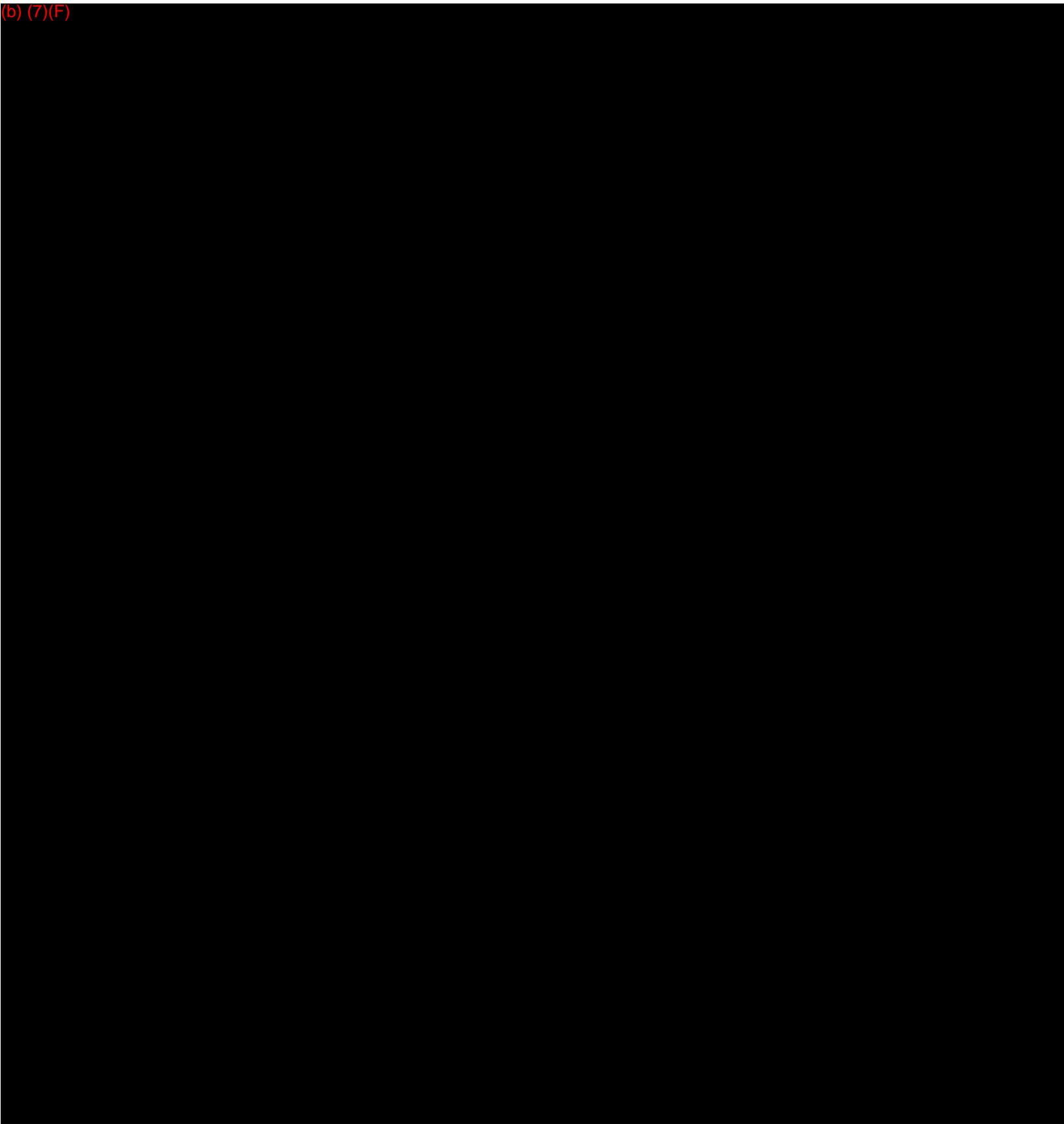
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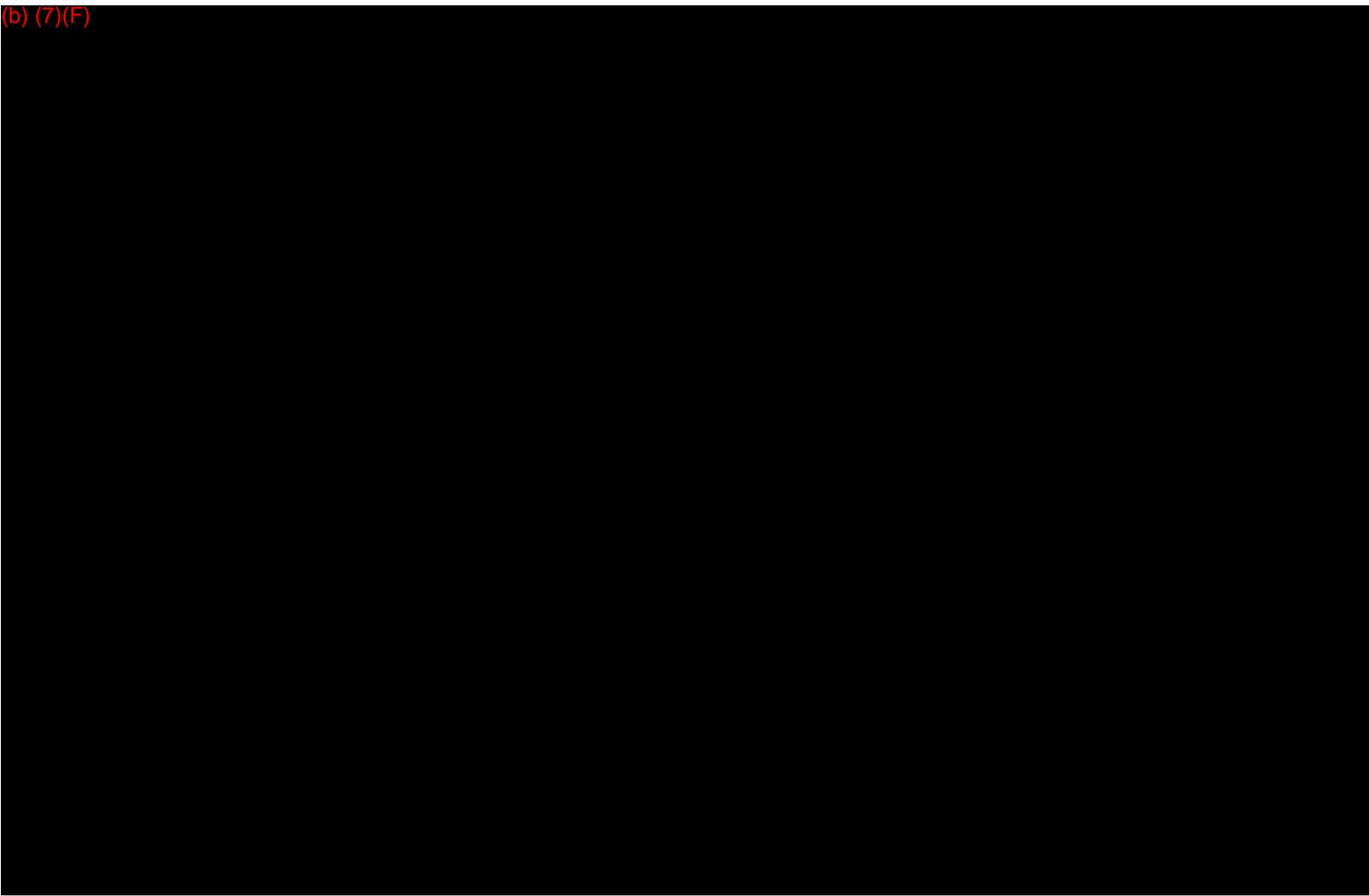
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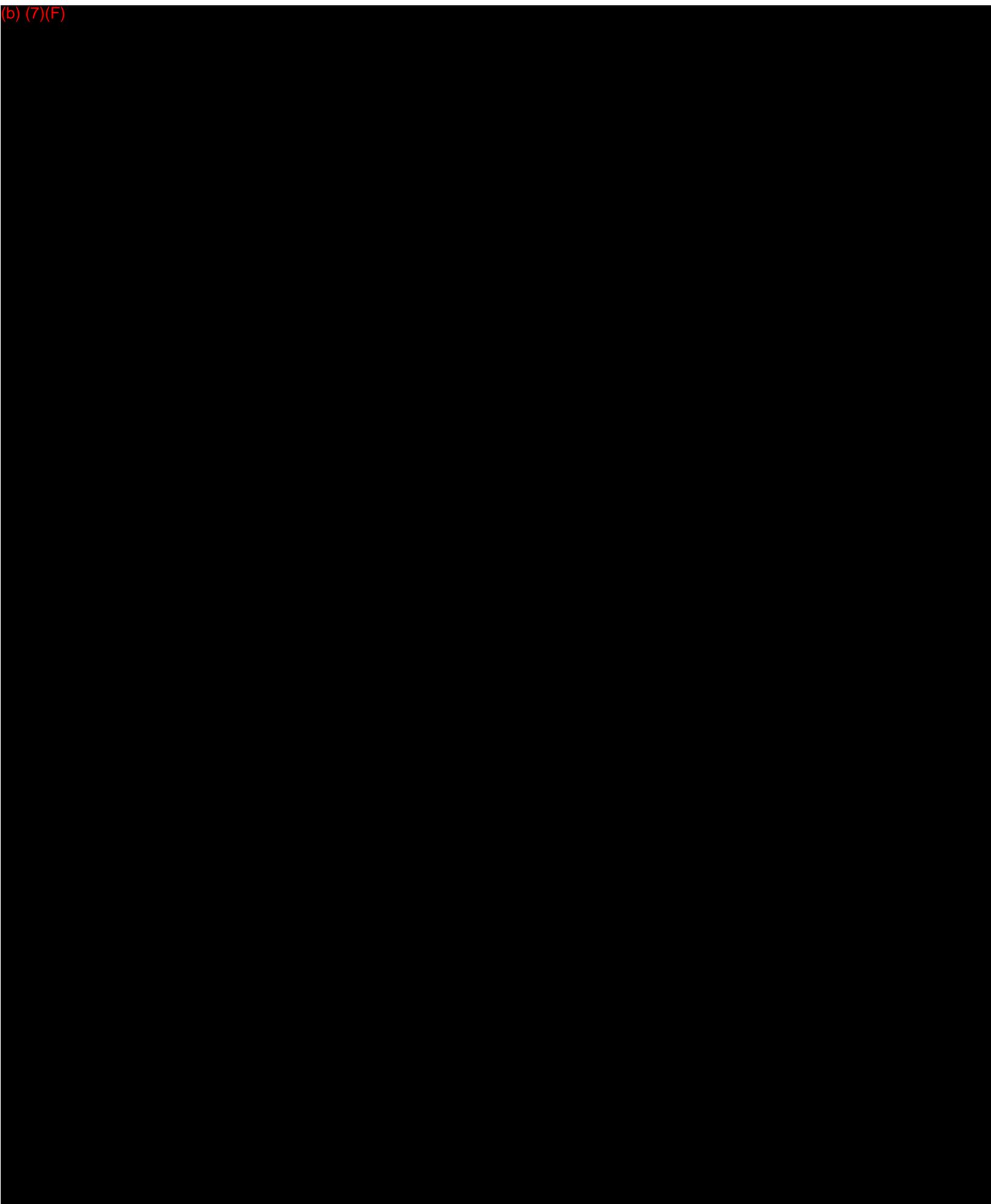
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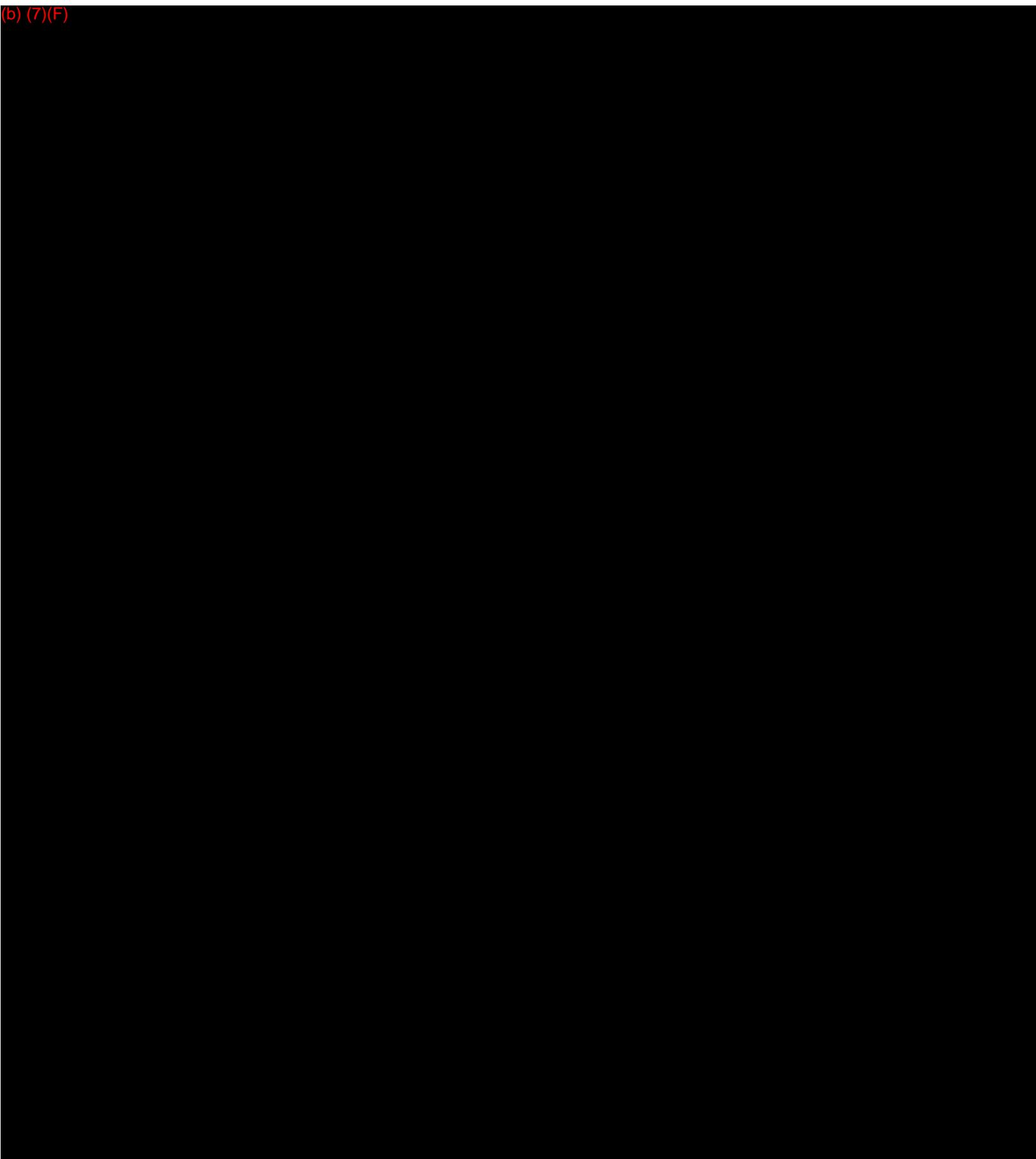


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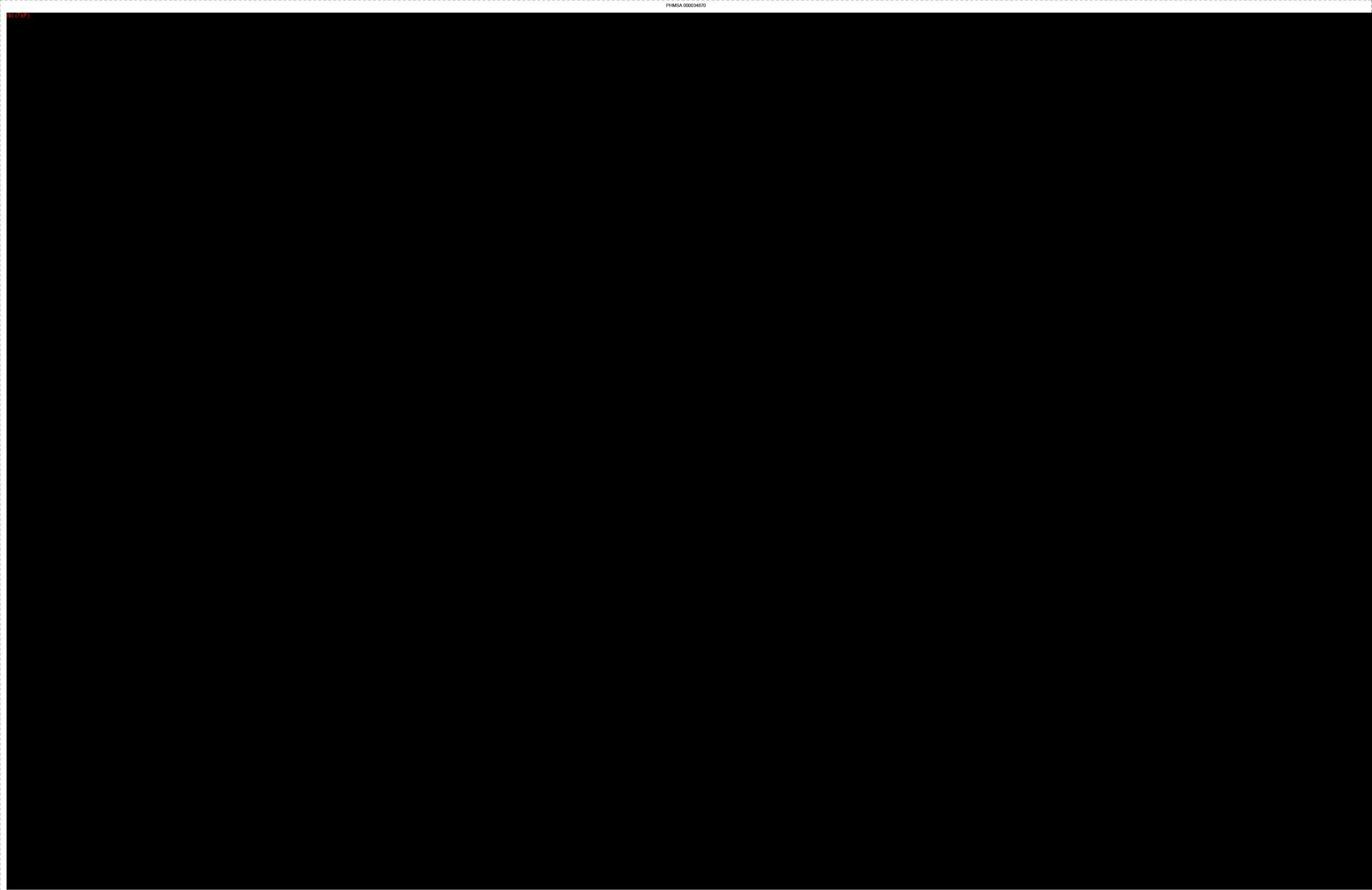


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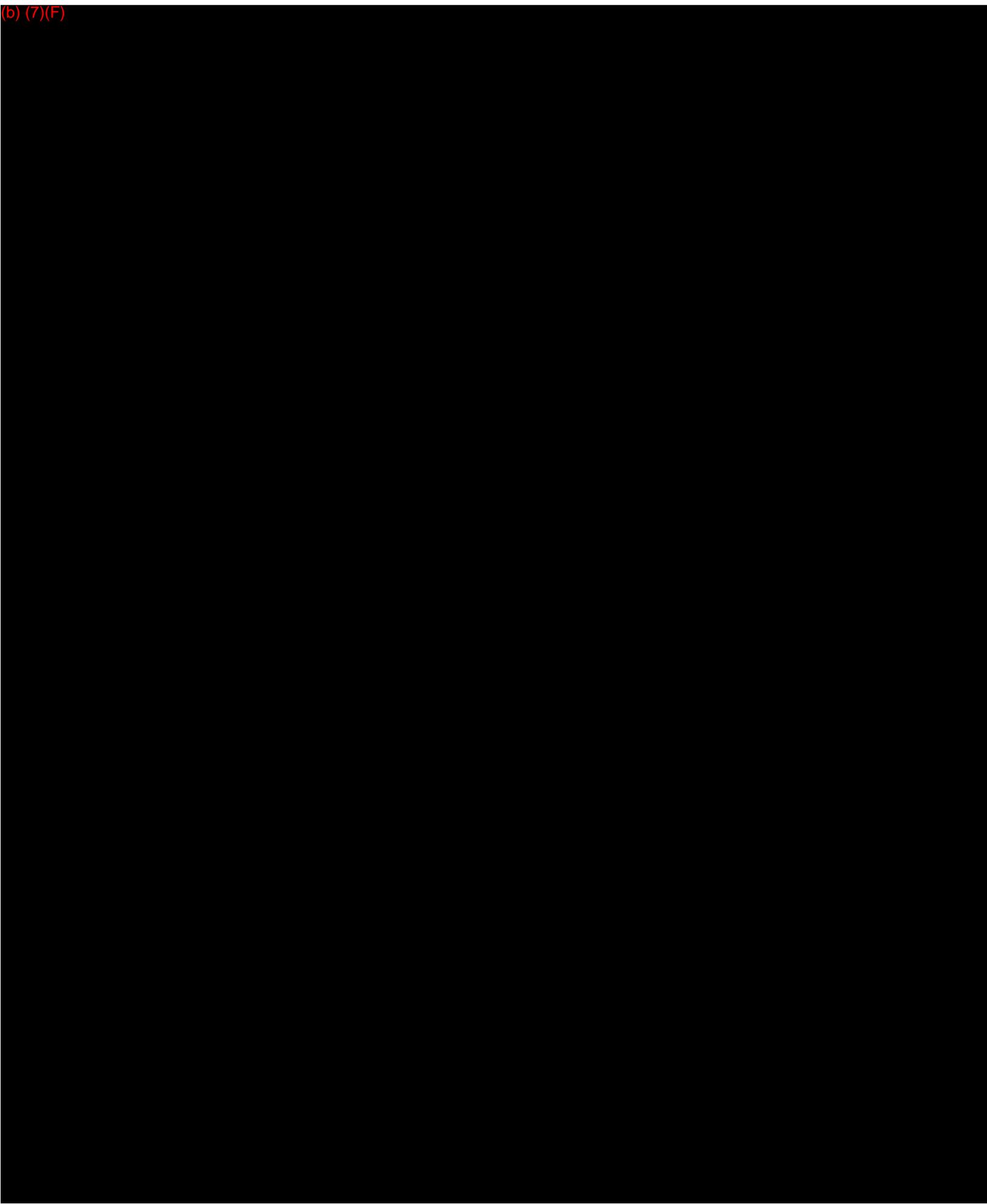


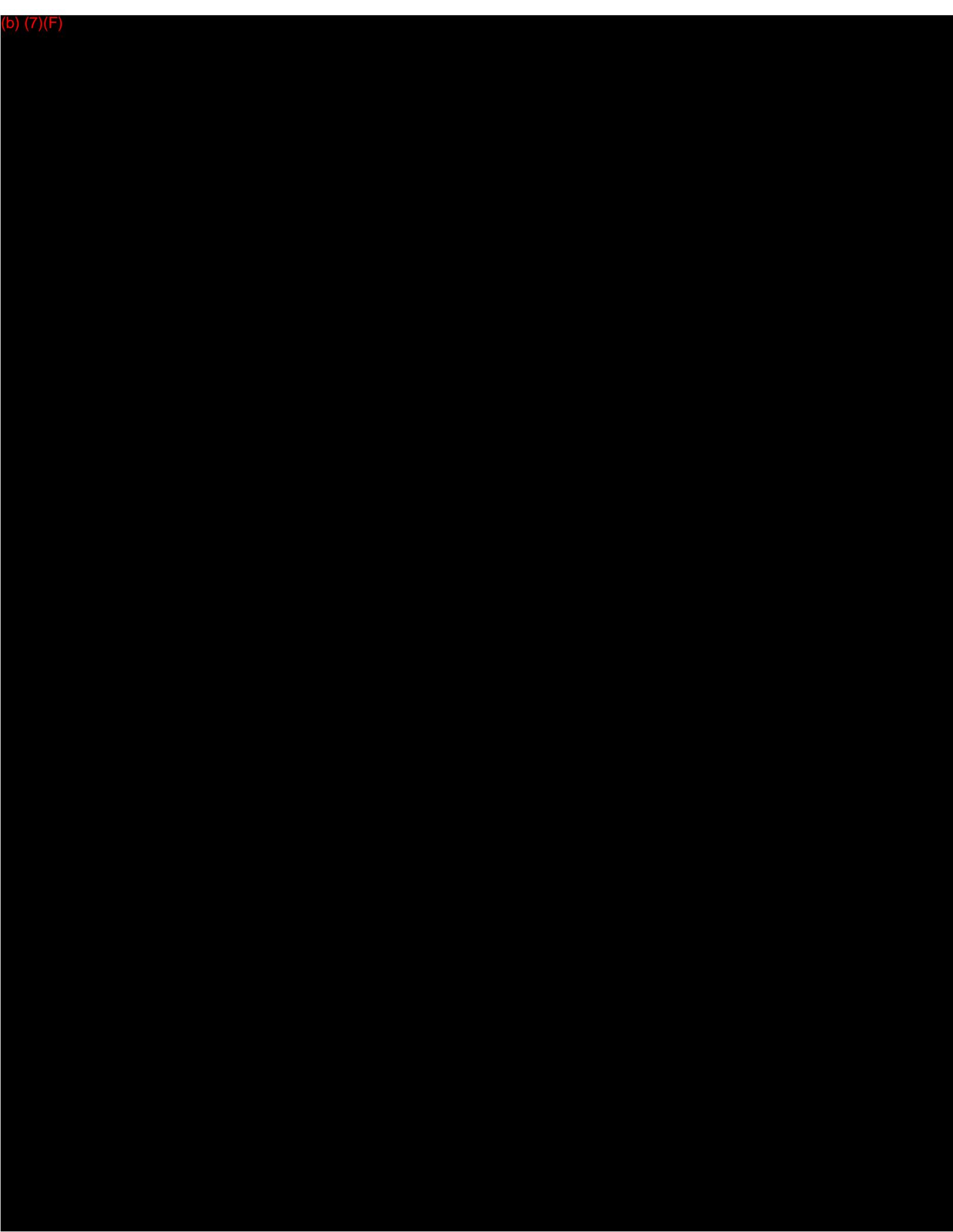
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(b) (7)(F)

Holiday Inn - Airport North
2800 Manchester Expressway
Columbus, GA 31904-5297

Food Service

China Moon Restaurant
2911 Airport Thruway
Columbus, GA 31909-5388
706/323-1388

Macon Road Barbecue
2703 Avalon Road
Columbus, GA 31907-2614
706/563-0542

Steak-out Charbroiled Delivery
3709 Gentian Blvd.
Columbus, GA 31907-1162
706/568-1007

Chick-Fil-A
Peachtree Mall
Columbus, GA 31901
706/323-0131

Section P: Medical, Site Safety & Health Plan

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LIST OF MEDICAL FACILITIES

Medical Service, Inc.-Ambulance
706/563-2121

Medical Center Hospital
710 Center Street
Columbus, GA
706/571-1000

St. Francis Hospital
2122 Manchester Expressway
Columbus, GA
706/596-4000

Doctor's Hospital
616 19th Street
Columbus, GA
706/494-4262

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SITE-SPECIFIC PROCEDURES

Anyone handling spilled material will wear as a minimum the following protective equipment:

- Rubber, neoprene, or nitrile gloves
- Rain suits or disposable coveralls where clothing contamination is likely to occur

Any entry into confined spaces will be conducted following Terminal confined space entry permit procedures.

Anyone who handles spilled material and gets a small amount of spilled material on their skin or clothing will decontaminate at the end of the work period/shift. Areas of gross contamination should be decontaminated immediately.

Decontamination will include a shower where any significant contamination occurs.

Equipment that comes in contact with spilled material will be cleaned before it leaves the site. Where it is not possible to completely clean equipment before it leaves the site, steps will be taken as needed to prevent the spread of spilled material. This equipment will be cleaned as soon as possible.

All containers of spilled material will be labeled. The label will include the identity of the spilled material and appropriate hazard warnings.

Anyone handling or likely to come in contact with the spilled material must receive a review of the MSDS for the spilled material. This review must take place prior to the employee handling or contacting the spilled material.

Log(s) of workers on site must be kept by the workers' managers. The purpose of these logs is to account for everyone on site at all times.

ALL CLEAN-UP CONTRACTORS MUST HAVE CURRENT HAZWOPER TRAINING, INCLUDING REFRESHER, APPROPRIATE FOR THE TASKS WHICH THEY WILL BE ASKED TO PERFORM.

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SAFETY / HEALTH / SECURITY

CORPORATE POLICY

It is the corporate policy of MPC to provide a safe workplace for all workers. All employees and contractors are responsible for maintaining the safety and health of all workers at MPC's facilities/operations at the Columbus, GA Light Products Terminal.

Prior to engaging in any spill response activity:

- All employees/contractors must have received orientation on MPC's Safety Plan.
- All contractor response personnel must be in compliance with OSHA training requirements.
- All other personnel will have completed appropriate training for their position as outlined in Section K.
- No employee/contractor shall engage in hazardous activities until the appropriate hazardous control measures have been established, including engineering and administrative controls and personal protective equipment.

GENERAL RESPONSE SAFETY

All company and contractor personnel are expected to comply with the Site Safety and Health Plan for each spill incident.

- Any concern regarding health or safety issues should be immediately addressed.
- The first responder must consider the spill site as dangerous and consider the local atmosphere surrounding the spill as containing flammable and/or toxic vapor until air monitoring procedures prove that the area is safe.
- The first responder must exit the area against or across the wind if possible and must also evacuate others who are working in the area.
- All injuries, no matter how minor, must be reported to a MPC Manager in a timely manner.
- Prior to entering a spill area, a qualified person must perform an initial safety and health evaluation of the site as outlined in this section.
- When appropriate, all workers must observe and follow the MPC Site Respiratory Protection Program in accordance with the TT&R Safety Policy and Procedures Manual.

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TEMPERATURE / HEALTH CONCERNS

Ambient temperatures can substantially affect work conditions and worker safety. All personnel should remain alert to changing conditions affecting their safety. Some temperature concerns are:

Heat Stress

- Before work begins, TT&R Safety Personnel will establish work/rest regimens based on ambient conditions and levels of PPE required for the task.
- During rest periods, remove/open protective clothing to facilitate body cooling.
- Adjust work/rest regimens as ambient conditions or levels of PPE change.
- Force fluids! All workers will be encouraged to increase fluid intake, keeping in mind that thirst is not an adequate indicator of the need for fluids.
- Electrolyte replacing fluids (*e.g.*, Gatorade, etc.) should be provided to personnel conducting operations in protective clothing.

Hypothermia

- Before work begins, TT&R Safety Personnel will establish work/rest regimens based on ambient conditions and levels of PPE required for the task.
- Persons exposed to wet conditions or immersion may have an increased risk of hypothermia.
- Layered clothing generally protects against cold better than single “heavy” garments.
- An affected person should be moved to a warm area and provided with dry clothing.
- Be aware of the mobility restraints when wearing multiple layers of clothing.

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AIR MONITORING

A Terminal/operation employee shall be designated as a Safety Monitor and shall be trained in the operation of air monitoring equipment. The Incident Commander must ensure that Safety Monitors are trained and that their equipment is maintained and ready for use.

The air monitoring equipment which will be used to detect flammable and/or toxic atmosphere must be calibrated by a qualified person prior to any air monitoring activity.

Records of calibration will be kept with each air monitoring instrument.

The following air monitoring measurements must be made prior to entry into a spill area in the order in which they are listed.

- Oxygen concentration in percent O₂
- Flammable concentration expressed as Lower Explosive Limit (LEL)
- Benzene (if gasoline is involved)
- LEL readings above 10% require immediate evacuation of the area and elimination of ignition sources.
- Oxygen readings below 19.5% require the use of air supplied respiratory protection

DECONTAMINATION

Establish “Exclusion - Hot”, “Decontamination - Decon”, and “Support - Safe” zones as required. The establishment of these zones helps to prevent the removal of contaminants from the containment area and unauthorized entry into contaminated areas.

- Regardless of the decontamination facilities/operations available, all efforts to minimize personnel exposure should be taken.
- Decontamination facilities/operations should be positioned prior to employee/contractor entrance to areas where potential for exposure to contamination exists. The appropriate Material Safety Data Sheets (MSDS) are available to aid health professionals treating the injured parties.
- Decontamination facilities/operations should be designed to prevent further contamination of the environment and should have a temporary storage area for items that will be reused in the contaminated area.
- Particular attention should be paid to personal hygiene prior to eating, drinking, or smoking.

WATER SAFETY (For Facilities/Operations with Protected Spills into Waterways)

USCG approved personal flotation devices (PFDs) shall be worn during all operations conducted in boats or where the possibility exists of falling into the water. PFDs used during night operations should be equipped with reflective tape to assist in locating personnel in the water.

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In the event that any person falls into the water:

- Stop all operations immediately
- Throw person a lifesaving device
- If person cannot be safely pulled to shore, launch a boat
- Approach the person from downstream or downwind
- Shut off engine when close
- Use boarding ladder if possible (If no ladder is available, use area of lowest freeboard)
- Keep boat balanced
- Do not go into the water to help unless the person is unconscious
- Bring the person on board stomach to gunnel
- Take precaution against hypothermia

During boom deployment operations the following safety practices should be considered:

- Adequate communication between the boat operator and personnel at the boom storage site is recommended to allow the operator to be informed immediately of any problems that may cause injuries to personnel or damage to equipment.
- Stay clear of tow lines as they may exhibit a whipping action if they break. The tow line should be attached to the tow vessel in such a way that it can be cast loose if necessary. Always have a knife on board in the event that it becomes necessary to free the boom from the boat due to strong currents, entanglement, or other factors.
- When taking up slack on the tow line ensure that all personnel stay clear to avoid the potential of getting a limb tangled in the line. Never allow anyone to hold a tow line during boom deployment. **Avoid tying the tow line to an off-center cleat as it can cause steering difficulties or allow the vessel to take on water.**
- Pull the boom at a reasonable, steady speed. Excessive speed can exert undue strain on the vessel, boat, and boom.
- Ensure that the boat has sufficient power for existing currents, winds, and length of boom being towed.

EMERGENCY MEDICAL TREATMENT

On-site emergency medical response requires the same rapid assessment of the patient as any other situation, but requires the responders to be aware of other considerations that may affect the way they handle the patient. These considerations include the following:

- The potential for contamination of the patient, responders, and equipment should be addressed. Responders should arrange to treat all patients **AFTER** the injured party has been decontaminated according to the incident-specific Site Safety and Health Plan.
- Site personnel should make the initial assessment of the patient and determine the severity of the injury/illness.
- If the treatment needed is critical care or “life saving” treatment, rapid decontamination

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of the injured/ill party should be started. Refer to the Site Safety and Health Plan for steps to be taken in an “abbreviated” decontamination for medical treatment.

- **The need for full decontamination should be carefully weighed against the need for prompt medical treatment.**
- The ambulance responding to medical emergencies shall be contacted as soon as possible and instructed exactly where to respond when needed and the nature of the contaminant. Refer to the emergency notification/phone list for a list of available emergency services and phone numbers.

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INITIAL SITE SAFETY AND HEALTH PLAN

Effective Until: ____/____/____

Revision No. _____

AFE Number _____

INCIDENT INFORMATION

INCIDENT NAME: _____

Date: ____/____/____ Time: _____

Nature of Incident: _____

Command Post Location: _____

Command Post Telephone Number: _____

Product Involved: _____ (Attach MSDS)

SITE CHARACTERIZATION

Source Transport Terminal Rail car
 Barge (Barge No. _____) Other _____

Water Bay Canal Creek River
 Shoreline Wetlands Muddy Sandy Rocky
 Other _____

Waves Height _____ ft/m Direction _____

Current Speed _____ mph/kts Direction _____

Land Brushland Forest Grassland Hills Mountains
 Other _____

Use Commercial Farmland Government Industrial Public
 Recreational Residential Other _____

Weather Ice Rain Snow Other
 Temperature _____ EF/EC Wind/Direction _____ mph

Pathways for Dispersion Air Water Land Other _____

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Site Security & Access Points (please describe): _____

Site Hazards

- | | | |
|---|---|--|
| <input type="checkbox"/> Boat safety | <input type="checkbox"/> Fire, explosion, in-situ burning | <input type="checkbox"/> Visibility |
| <input type="checkbox"/> Chemical hazards | <input type="checkbox"/> Heat Stress | <input type="checkbox"/> Pumps and hoses |
| <input type="checkbox"/> Cold Stress | <input type="checkbox"/> Helicopter operations | <input type="checkbox"/> Steam and hot water |
| <input type="checkbox"/> Confined spaces | <input type="checkbox"/> Lifting | <input type="checkbox"/> UV radiation |
| <input type="checkbox"/> Drum handling | <input type="checkbox"/> Motor vehicles | <input type="checkbox"/> Slips, trips, and falls |
| <input type="checkbox"/> Equipment operations | <input type="checkbox"/> Noise | <input type="checkbox"/> Trenching/excavation |
| <input type="checkbox"/> Electrical hazards | <input type="checkbox"/> Overhead/buried utilities | <input type="checkbox"/> Weather |
| <input type="checkbox"/> Fatigue | <input type="checkbox"/> Plants/wildlife | <input type="checkbox"/> Work near water |
| <input type="checkbox"/> Other _____ | <input type="checkbox"/> Other _____ | <input type="checkbox"/> Other _____ |

Initial Air Monitoring

- % O₂ _____ %LEL _____ ppm Benzene _____
 ppm H₂S _____ Other (specify) _____

Monitoring Requirements: Continuous Periodic (Interval: _____) Personal (OV Badge)

NOTE: Air Monitoring results will be posted in the Command Post.

CONTROL MEASURES

Engineering Controls

- | | | |
|--|---|---|
| <input type="checkbox"/> Source of release secured | <input type="checkbox"/> Valve(s) closed | <input type="checkbox"/> Facility shut down |
| <input type="checkbox"/> Site secured | <input type="checkbox"/> Energy sources locked/tagged out | <input type="checkbox"/> Other _____ |

Personal Protective Equipment (Check all that apply)

- | | |
|---|--|
| <input type="checkbox"/> Impervious suits _____ | <input type="checkbox"/> Respirators _____ |
| <input type="checkbox"/> Inner gloves _____ | <input type="checkbox"/> Eye Protection _____ |
| <input type="checkbox"/> Outer gloves _____ | <input type="checkbox"/> Personal floatation _____ |
| <input type="checkbox"/> Flame resistant clothing _____ | <input type="checkbox"/> Boots _____ |
| <input type="checkbox"/> Hard hats _____ | <input type="checkbox"/> Hearing Protection _____ |
| <input type="checkbox"/> Other _____ | |

Decontamination Stations established.

Sanitation Facilities provided per OSHA 29 CFR 1910.120(n).

Illumination Facilities provided per OSHA 29 CFR 1910.120(m).

Medical Surveillance Provided per OSHA 29 CFR 1910.120(f).

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WORK PLAN

- Booming Skimming Vac Trucks Pumping Excavation
- Heavy equip. Sorbant pads Patching Hot work Appropriate permits
- Other (describe): _____

(Buddy System must always be used)

NOTE: All work shall be conducted in accordance with procedures established during Safety Briefings and the approved Incident Action Plan. (IAP will be provided as a separate document.)

Training MPC and Contract personnel are required to be trained in accordance with 29 CFR 1910.120 for the level which they are performing duties.

ORGANIZATION

<u>Title</u>	<u>Name</u>	<u>Telephone/Radio</u>
Federal OSC	_____	_____
State OSC	_____	_____
LEPC	_____	_____
MPC Senior Manager	_____	_____
Incident Commander	_____	_____
Deputy Incident Commander	_____	_____
Safety Officer	_____	_____
Public Affairs	_____	_____
Operations Section Chief	_____	_____
Planning Section Chief	_____	_____
Logistics Section Chief	_____	_____
Environmental Unit Leader	_____	_____
Finance Section Chief	_____	_____
Legal Officer	_____	_____
Liaison Officer	_____	_____
Joint Information Manager	_____	_____
Community Relations	_____	_____
Contractor "A" Safety Officer	_____	_____
Contractor "B" Safety Officer	_____	_____
Agency "A" Safety Officer	_____	_____
Agency "B" Safety Officer	_____	_____

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EMERGENCY PLAN

Alarm system Air Horn Radio Signal Other _____

Evacuation Plan Rally Locations Established
..... Site Personnel Briefed on Locations

First Aid

- First Aid Kits (Location: _____)
- Emergency Eye Wash (Location: _____)
- Emergency Shower (Location: _____)
- Other First Aid Supplies (Location: _____)

Inclement Weather Action Level for Work Stoppage Established
Action Level: Lightning High Winds Other: _____

Emergency Services Notifications

Phone Number

- Hospital _____
- Ambulance _____
- Air Ambulance _____
- Fire _____
- Law Enforcement _____
- Emergency Response/Rescue _____
- Other _____
- Other _____

Safety Briefings Initial safety briefing prepared. Briefing reviewed/updated as necessary

INCLUDED ATTACHMENTS/APPENDICES

Attachments

- Site Map
- Material Safety Data Sheets
- PPE ensemble sheets
- Decontamination procedures and layout
- Hazard information for oils containing Benzene
- Sanitation requirements
- Hazard information for oils not containing Benzene
- Industrial Hygiene Air Monitoring Form
- Site safety briefing documentation form

Initial Site Safety & Health Plan Completed By _____

Date Completed: ____/____/____

Latest Revision: January 6, 2000

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