



Sunoco Logistics



**Sunoco Pipeline L.P.
Facility Response Plan
PHMSA Sequence Number
Great Lakes District - Cleveland Response Zone**

**Sunoco Partners Pipeline, L.P.
1818 Market Street, Suite 1500
Philadelphia, PA 19103
Revised August, 2013**

Developed Under the Guidelines:
49 CFR Part 194 Subpart B Oil Spill Response Manual Appendix A
49 CFR Part 195 402 (e)

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1.0 INFORMATION SUMMARY

1.1 Purpose of Plan

The purpose of this Facility Response Plan (FRP) is to provide guidelines to quickly, safely, and effectively respond to a spill from Sunoco Pipeline L.P. pipelines located in the Great Lakes District - Cleveland Response Zone. The pipelines are owned by Sunoco Pipeline L.P. and operated by Sunoco Pipeline L.P.

This Plan is intended to satisfy the requirements of the Oil Pollution Act of 1990 (OPA 90), and has been prepared in accordance with the National Oil and Hazardous Substances Pollution Contingency Plan (NCP) and applicable Area Contingency Plans (ACP). Specifically, this Plan is intended to satisfy:

- Pipeline and Hazardous Materials Safety Administration (PHMSA), U.S. Department of Transportation requirements per 49 CFR 195.402 for an OPA 90 plan (49 CFR 194)

A DOT/PHMSA Cross Reference Matrix is provided in **APPENDIX A**.

1.2 Response Zone Information Summary

The information summary for the Great Lakes District - Cleveland Response Zone is presented below:

TABLE 1-1 – CLEVELAND RESPONSE ZONE INFORMATION SUMMARY

Owner: Sunoco Logistics Partners Pipeline L.P. 1818 Market Street, Suite 1500 Philadelphia, PA 19103-1699 Phone: (215) 977-3000 Fax: (215) 977-3409	Operator: Sunoco Pipeline L.P. 7155 Cleveland Road Taylor, MI 48180
Qualified Individuals:	Kirk Greenlee Area Manager 313-292-9839 Office 313-215-2314 Mobile
	Dave Chalson Vice President Operations Unified Command Representative (215) 339-1331 (Office) (215) 620-0287 (Mobile)
	Gus Borkland HES&S Manager (215) 977-6136 (Office) (b) (6) (215) 620-5934 (Mobile)
	Nick Wilkerson Health & Safety Manager (859) 371-4469 (Office) (859) 940-6020 (Mobile)
	Matt Studer Inland Operations Manager (216) 912-2557 (Office) (b) (6) (330) 603-3131 (Mobile)
	Jace Diezman Maintenance Supervisor Qualified Individual (216) 912-2579 (Office) (b) (6) (216) 233-7168 (Mobile)

Pipeline Description:	The Sunoco Pipeline L.P. Cleveland Pipeline System transports petroleum products (gasoline, fuel oil and ethane) in the areas shown in the maps included with this plan.
Response Zone:	The response zone is the entire Cleveland Pipeline System. The Response Zone has the potential for “significant and substantial harm” and has the potential for a “worst case discharge”

TABLE 1-2 – DESCRIPTION OF LINE SEGMENTS/STATIONS
REFINED PETROLEUM ASSETS

Line Segments	Description	Counties	Product
	(b) (7)(F)	Somerset, Portage, Mahoning, Columiana, Beaver, Allegheny	Refined Petroleum Products
		Huron, Lorain, Mahoning, Portage, Summit	Refined Petroleum Products
		Summit, Portage	Refined Petroleum Products
		Inland	
		Senica, Huron, Ashland, Wayne	Refined Petroleum Products
		Wayne, Summit, Portage	Refined Petroleum Products
		Cuyahoga, Summit	Refined Petroleum Products
		Portage	Refined Petroleum Products
		Portage, Stark	Refined Petroleum Products
		Portage, Summit	Refined Petroleum Products
		OOS. Portage, Summit	Refined Petroleum Products
		Cuyahoga	Refined Petroleum Products
		Cuyahoga	Refined Petroleum Products

Facilities	Name	Facility or Pump Station	# of Tanks
	Burbank	Pump Station / OOS	0
	Grafton	Facility	0
	Mogadore	Facility	8
	Akron	Facility	0
	Bradley Road	Facility	16
	Cleveland	Terminal	0
	Flats	Facility	0
	Hartville	Pump Station	0
	Canton	Facility	0
	Boardman	Pump Station	2
	Youngstown	Facility	0
	Hudson	Pump Station	3
	Norwalk	Pump Station	0
	Medina	Pump Station	0

LPG ASSETTS

Line Segments	Description	Counties	Refined Petroleum Products
	(b) (7)(F)	ahoning, Portge, Summit	Ethane
		ummit, Medina, Lorain, Huron	Ethane

LPG ASSETTS

Facilities	Description	County	# of Tanks
			N/A

(b) (7)(F)

Alignment Maps Location(s): (Piping, Plan Profiles)	Maintained in an electronic database
Spill Detection and Mitigation Procedures:	Refer to SECTION 3
Worst Case Discharge:	
Statement of Significant and Substantial Harm:	<p>Basis for Operator's Determination of Significant and Substantial Harm</p> <ul style="list-style-type: none"> • At least one pipeline in the Response Zone is greater than 6 5/8 inches and most pipelines are longer than 10 miles • At least one section of pipeline crosses a river, meeting the requirement for location within one-mile of an environmentally sensitive area • Therefore, the potential to cause significant and substantial harm is present within the entire Response Zone

The information contained in this Plan is intended to be used as guidelines for the spill responder. Actual circumstances will vary and will dictate the procedures to be followed, some of which may not be included in this manual.

1.3 Operator Certification

In accordance with section 311 (j) (5) (F) of the Federal Water Pollution Control Act, as amended by Section 4202 of the Oil Pollution Act of 1990, I do hereby certify to the Pipeline and Hazardous Materials Safety Administration of the Department of Transportation that Sunoco Pipeline, L.P. has obtained, through contract or other approved means, the necessary private personnel and equipment to respond, to the maximum extent practicable, to a worst case discharge or a substantial threat of such a discharge.

Furthermore, Sunoco Pipeline, L.P. response plan is consistent with the National Contingency Plan (NCP) and each applicable Area Contingency Plan (ACP).

Thomas Mellert
Operations Supervisor
SUNOCO LOGISTICS PARTNERS, L.P.

2.0 NOTIFICATION PROCEDURES

2.1 Notification Overview

The facility/operations personnel responsible for initiating and coordinating a response shall be responsible to ensure that all agency notifications are performed. Depending on the specifics of the situation, there may exist a requirement to perform agency notifications, internal notifications, drug and alcohol testing, Operator Qualification (OQ) suspension of task qualification and written follow-up. In situations where the reporting requirements are not clear or delegation of duties is necessary, HES&S or DOT Compliance for jurisdictional pipelines should be consulted for guidance.

In general, the notification sequence for a release is as follows:

- Station/Operations personnel will identify and control the source of the release (if safe to do so) and will notify the Qualified Individual and Operations Control Center.

2.2 Information Required for Notifications

The following information should be available and provided when making initial and follow-up notifications:

Name of pipeline:

Time of discharge:

Location of discharge:

Name of oil involved:

Reason for discharge (e.g., material failure, excavation damage, corrosion):

Estimated volume of oil discharged:

Weather conditions on scene:

Actions taken or planned by persons on scene:

The following tables contain contact information for the facility response team, emergency response personnel, regulatory agencies, and local service providers:

TABLE 2-1 – FACILITY RESPONSE TEAM CONTACT INFORMATION

FACILITY RESPONSE TEAM		
Name/Title	Contact Information	Response Time
Matt Studer Inland Operations Manager Qualified Individual	(216) 912-2557 (Office) (b) (6) (330) 603-3131 (Mobile)	2-3 Hours
Jace Diezman Maintenance Supervisor Qualified Individual	(216) 912-2579 (Office) (b) (6) (216) 233-7168 (Mobile)	2-3 Hours
Thomas Mellert Operations Team Leader	(216) 912-2558 (Office) (b) (6) (216) 701-0006 (Cell)	2-3 Hours

TABLE 2-2 – ERP CONTACT INFORMATION

EMERGENCY RESPONSE PERSONNEL CONTACT INFORMATION			
Name/Title	Contact Information	Response Time	Responsibilities During Response Action
Kirk Greenlee District Supervisor Qualified Individual	313-292-9839 Office 313-215-2314 Mobile	2-3 Hours	Incident Commander
Gus Borkland HES&S Manager Qualified Individual	215-977-6136 Office 215-620-5934 Cell	6-8 Hours	Operations
Dave Chalson Vice President Qualified Individual	215-339-1331 Office 215-620-0287 Cell	5-7 Hours	Operations/Planning
Troy Clayton Operations Supervisor Qualified Individual	(419) 691-5722 ext 223 (Office) (b) (6) (419) 304-0376 *(Mobile)	2-3 Hours	Planning
Ryan Kiley Health & Safety Manager	215-937-6283 (Office) 267-229-4502 (Mobile)	6-8 Hours	Logistics
Dennis Kelly Health and Safety Specialist	412-784-3481 Office 412-855-7700 Cell	3-6 Hours	Safety
Ron O'Toole Emergency Response Manager Qualified Individual	412-784-3472 Office 412-760-3520 Cell	3-6 Hours	Environmental Liaison
Al Kravatz DOT Compliance Supervisor	610-859-5755 Office 215-779-3001 Cell	5-7 Hours	Regulatory Liaison

TABLE 2-3 – REGULATORY AGENCY CONTACT INFORMATION

REGULATORY AGENCY CONTACT INFORMATION		
Agency	Phone Number	Reporting Requirements
Federal Agencies		
National Response Center (NRC) <i>NRC will contact all other federal agencies including USDOT/PHMSA and EPA</i>	(800) 424-8802 (202) 267-2675	The operator must notify the NRC at the earliest practicable moment following the discovery of a hazardous liquid release.
National Response Center (USCG)	1-800-424-8802	
State Agencies		
Ohio Environmental Protection Agency	419-352-8461 Northwest 330-963-1200 Northeast	Minutes any amount of petroleum that causes a film or sheen or discoloration to the surface of waters or that causes a sludge/emulsion beneath the water surface Report Within 30 Minutes 25 gallons or more of any petroleum released to the environment (navigable water excluded) and is NOT contained entirely on-site Report Within 30 Minutes 210 gallons (5 barrels) or more of crude oil released from an oil & gas extraction storage facility to the environment (navigable water excluded)

U.S. Department of Transportation Office of Public Safety, Washington, DC	(800) 424-8802 (202) 267-2675	
USCG OSROs		Response Capability
McCutcheon	724-568-3623	
SWS Environmental Services	678-835-0392 800-852-8878 (24 hrs.)	Tier 1
Clean Venture, Inc	800-347-7672 (24 hrs.)	Tier 2
BBU Environmental Services P.O. Box 2541 2206 Horns Mill Road SE	(800) 837-8064 (24 hour Emergency) 740- 681-9902 740- 681-1389 (Fax) bbu@rrohio.com	
Marine Pollution Control Corporation 8631 West Jefferson Detroit, MI	313- 849-2333 (24 hour Emergency) (313) 849-1623 (Fax) info@marinepollutioncontrol.com	Tier 1
National Response Corporation 3500 Sunrise Highway, Suite T103 Great River, NY 11739 Great River , NY	631- 224-9141 631- 224-9082 (Fax) iocdo@nrcc.com	Tier 1
Inland Waters of Ohio	216-861-3949	Tier 1
Specialized Response Service (SRS) LPG Assets	877- 506-0025	
Clean Harbors	216-429-2402	
Excavation Contractors		
Holly Construction Contract #200146	734- 397-0040 5800 Belleville Rd. Belleville, MI	
RL Coolsaet Contract #260096	(734) 946-9300 1000 S. Dix Street Detroit MI, 48217	
Welded Construction, L.P. 26933 Eckel Road Perrysburg, Ohio 43551	(888) 4-WELDED (419) 874-3548 (419) 874-4883 (Fax)	
Ronnie Mote		
Otis Eastern	585-593-4760	
Denes Concrete	440-647-5275	
Service Providers		
C&W Tank Cleaning Company, Inc. 50 North	(419) 691-1995 (419) 691-1997 (fax)	

Lallendorf Road	cwtanks@cwttank.com	
EQ Industrial Services, Inc.	(734) 547-2500	
GES - Groundwater Environmental Services Contract #280156	(610) 458-1077	
M L Chartier Contract #270117	(586) 725-8373 –Business hours (888) 334-8373 (24 hrs.)	
NOMMAD - Northern Ohio & Michigan Mutual Aid District	(419) 213-6527 (800) 338-4542 - Office	
PSC Industrial Services Contract #290024	(419) 467-9848	
Chemtron Corp.	440-930-8464 33565 Pin Oak Parkway Avon Lake OH, 44012	
Heritage Environmental	419-729-1343	
Wildlife Rehabilitation		
Tri-State Bird Rescue Research Center, Newark, DE	(302) 737-7241 (800) 710-0695	

TABLE 2-4 – EMERGENCY SERVICES CONTACT INFORMATION

EMERGENCY SERVICES BY COUNTY	
Organization	Phone Number
Columbiana Co. Police Columbiana Co. Information Coordinator Columbiana Co. LEPC	911 330-424-0861 330-424-0861 (24 hrs.)
Wayne Co. Police Wayne Co. Information Coordinator Wayne Co. LEPC	911 330-262-9817 330-287-5700 (24 hrs.)
Stark Co. Police Stark Co. Information Coordinator Stark Co. LEPC	911 330-451-3907 330-451-3911 (24 hrs.)
Ashland Co. Police Ashland Co. Information Coordinator Ashland Co. LEPC	911 419-282-4272 419-289-2911 (24 hrs.)
Huron Co. Police Huron Co. Information Coordinator Huron Co. LEPC	911 419-663-5772 419-651-1868 (24 hrs.)
Cuyahoga Co. Police Cuyahoga Co. Information Coordinator Cuyahoga Co. LEPC	911 216-443-5472 216-771-1365 (24 hrs.)
Summit Co. Police Summit Co. Information Coordinator Summit Co. LEPC	911 330-643-2558 330-643-2522 (24 hrs.)
Huron Co. Police Huron Co. Information Coordinator Huron Co. LEPC	911 419-663-5772 419-651-1868 (24 hrs.)
Lorain Co. Police	911

Lorain Co. Information Coordinator	440-329-5117
Lorain Co. LEPC	440-329-5444 (24 hrs.)
Mahoning Co. Police	911
Mahoning Co. Information Coordinator	330-740-2200
Mahoning Co. LEPC	330-744-4161 (24 hrs.)
Medina Co. Police	911
Medina Co. Information Coordinator	330-722-9240
Medina Co. LEPC	330-725-6631 (24 hrs.)
Portage Co. Police	911
Portage Co. Information Coordinator	330-297-4571
Portage Co. LEPC	330-296-0222 (24 hrs.)

TABLE 2-5 - CONTRACTOR CONTACT INFORMATION

CONTRACTOR INFORMATION	
Organization	Phone Number
USCG Classified OSRO's	
Progressive Environmental Service (Eagle/SWS)	(877)742-4215 (678) 835-0392
McCutcheon	(724)568-3623
National Response Corporation	(800) 899-4672
Clean Venture, Inc.	(800) 347-7672
Specialized Response Service (SRS) LPG Assets	(877) 506-0025
Wildlife Rehabilitation	
Tri-State Bird Rescue Research Center, Newark, DE	(302) 737-7241 (800) 710-0695

3.0 SPILL DETECTION AND ON-SCENE SPILL MITIGATION PROCEDURES

3.1 Spill Detection

Detection of a discharge from a pipeline system may occur in a number of ways including:

- Detection by the pipeline Control Center Supervisor (CCS)
- Visual detection by Company or contracted field personnel or pipeline patrols
- Visual detection by the public

(b) (7)(F)

AVAILABILITY - ALL LINES

- **Training**
All Controllers are compliant with DOT 195 Operator Qualification Requirements established in 49 CFR 195 Subpart G.

Visual Detection by Company Personnel

Aerial patrol flights will be made 26 times a year not to exceed 21 days apart. If unable to fly, area personnel will walk or drive the right-of-way. The intent of the patrol is to observe the area in the vicinity of the pipeline right-of-way for leaks, exposed pipes, wash-outs, missing markers, and other unusual conditions. Construction activity on either side of the pipeline right-of-way is also monitored. Discharges to the land or surface waters may also be detected by Company personnel during regular operations and inspections. Should a leak be detected, the appropriate actions are taken including but not limited to:

- Notifications as per **SECTION 2**
- A preliminary assessment of the incident area
- **If appropriate, initiate initial response actions per SECTION 4**

TABLE 4.1 provides a checklist for initial response actions.

Visual Detection by the Public

Right-of-way markers and signs are installed and maintained at road crossing and other noticeable points and provide an Operations Control 24-hour number for reporting emergency situations. The Company also participates in the “call before you dig” or “One Call” utility notification services which can be contacted to report a leak and determine the owner/operator of the pipeline. If the notification is made to a local office or pump station, the Company representative receiving the call will generally implement the following actions:

- Notify the Pipeline Control Center and region/designated office
- Dispatch Company field personnel to the site to confirm discharge and conduct preliminary assessment
- Notify their immediate area supervisor and provide assessment results

Pipeline Shutdown

If any of these situations are outside the expected values, abnormal conditions are considered to exist. If abnormal conditions exist, Pipeline Controller will take the appropriate actions to ensure that a release does not occur. If a discharge has occurred, Pipeline Control will take actions to limit the magnitude. In either case, appropriate actions taken by Company personnel could include, but are not limited to:

- Shut down affected line segment if there is an indication of a leak
- Isolate line segment
- Depressurize line
- Start internal and external notifications
- Mobilize additional personnel as required

3.2 Spill Mitigation Procedures

Each spill mitigation situation is unique and must be treated according to the circumstance present. In every situation, however, **personnel safety must be assessed as the first priority**. The potential for ignition and/or toxic exposure must be promptly evaluated. An example of spill mitigation procedures are listed below:

If the use of alternative response strategies are identified for use such as in-situ burning or dispersants as identified in the Eastern Great Lakes Area Contingency Plan, Sunoco Logistics will seek approval from the Regional Response Team in conjunction with the US EPA, PADEP and or the USCG as appropriate. An example of spill mitigation procedures are listed below:

TABLE 3-1 – SPILL MITIGATION PROCEDURES REFINED PRODUCTS

TYPE	MITIGATION PROCEDURE REFINED PRODUCT
Failure of Transfer Equipment	<ol style="list-style-type: none"> 1. Personnel safety is the first priority. Evacuate nonessential personnel or personnel at high risk. 2. Terminate transfer operations and close block valves. 3. Drain product into containment areas if possible. 4. Eliminate sources of vapor cloud ignition by shutting down all engines and motors.
Tank Overfill/Failure	<ol style="list-style-type: none"> 1. Personnel safety is the first priority. Evacuate nonessential personnel or personnel at high risk. 2. Shut down or divert source of incoming flow to tank. 3. Transfer fluid to another tank with adequate storage capacity (if possible). 4. Shut down source of vapor cloud ignition by shutting down all engines and motors. 5. Ensure that dike discharge valves are closed. 6. Monitor diked containment area for leaks and potential capacity limitations. 7. Begin transferring spilled product to another tank as soon as possible
Piping Rupture/Leak (under pressure and no pressure)	<ol style="list-style-type: none"> 1. Personnel safety is the first priority. Evacuate nonessential personnel or personnel at high risk. 2. Shut down pumps. Close the closest block valves on each side of the rupture. 3. Drain the line back into contained areas (if possible). Alert nearby personnel of potential safety hazards. 4. Shut down source of vapor cloud ignition by shutting down all engines and motors. 5. If piping is leaking and under pressure, then relieve pressure by

	draining into a containment area or back to a tank (if possible). Then repair line according to established procedures.
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TYPE	MITIGATION PROCEDURE REFINED PRODUCTS
Fire/Explosion	<ol style="list-style-type: none"> 1. Personnel safety is the first priority. Evacuate nonessential personnel or personnel at risk of injury. 2. Notify local fire and police departments. 3. Attempt to extinguish fire if it is in incipient (early) stage and if it can be done safely. 4. Shut down transfer or pumping operation. Attempt to divert or stop flow of product to the hazardous area (if it can be done safely). 5. Eliminate sources of vapor cloud ignition shutting down all engines and motors. 6. Control fire before taking steps to contain spill.
Manifold Failure	<ol style="list-style-type: none"> 1. Personnel safety is the first priority. Evacuate nonessential personnel or personnel at high risk. 2. Terminate transfer operations immediately. 3. Isolate the damaged area by closing block valves on both sides of the leak/rupture. 4. Shut down source of vapor cloud ignition by shutting down all engines and motors. 5. Drain fluids back into containment areas (if possible).

TABLE 3-1 – SPILL MITIGATION PROCEDURES LPG

TYPE	MITIGATION PROCEDURE - LPG
Failure of Transfer Equipment	<ol style="list-style-type: none"> 1. Personnel safety is the first priority. Evacuate nonessential personnel or personnel at high risk. 2. Terminate transfer operations. 3. Eliminate sources of vapor cloud ignition by shutting down all engines and motors. 4. Follow EPP-105 Guidelines for LPG Emergency Response 5. Establish a safe perimeter.
Piping Rupture/Leak (under pressure and no pressure)	<ol style="list-style-type: none"> 1. Personnel safety is the first priority. Evacuate nonessential personnel or personnel at high risk. 2. Shut down pumps. Close the closest block valves on each side of the rupture.. 3. Shut down source of vapor cloud ignition by shutting down all engines and motors. 4. If piping is leaking and under pressure, then relieve pressure by flaring. Follow EPP-105. Then repair line according to established procedures.
Fire/Explosion	<ol style="list-style-type: none"> 1. Personnel safety is the first priority. Evacuate nonessential personnel or personnel at risk of injury.

	<ol style="list-style-type: none"> 2. Notify local fire and police departments. 3. Do not attempt to extinguish fire. 4. Shut down transfer or pumping operation. Attempt to divert or stop flow of product to the hazardous area (if it can be done safely). 5. Eliminate sources of vapor cloud ignition shutting down all engines and motors. 6. Allow fire professionals to protect adjacent property and assets.
Manifold Failure	<ol style="list-style-type: none"> 1. Personnel safety is the first priority. Evacuate nonessential personnel or personnel at high risk. 2. Terminate transfer operations immediately. 3. Isolate the damaged area by closing the closest valve that can be reached safely valves on both sides of the leak/rupture. 4. Shut down source of vapor cloud ignition by shutting down all engines and motors.

3.3 Response Equipment

Emergency equipment is available to allow personnel to respond safely and quickly to emergency situations. Fire extinguishers are located throughout the facility and meet National Fire Prevention Association (NFPA) and OSHA standards. All other response equipment will be supplied by the OSROs listed in **TABLE 2-5**. This equipment is maintained regularly and inspected on a monthly basis.

Response equipment is mobilized and deployed by the Maintenance Station Foreman or District Supervisor or their designee. The order of equipment mobilization should be as follows:

1. Closest OSRO
2. Second closest OSRO
3. National OSRO

Sunoco Pipeline requires an annual certification from each OSRO to assure compliance with the National Preparedness for Response Exercise program (PREP) guidelines.

Each listed OSRO has their own response equipment, a minimum of 1,000 feet of containment boom, absorbents, boats, and vacuum trucks. Lists of the OSRO's equipment resources may be found in their services contract. OSRO response equipment is inspected and refurbished after every use which is typically more than once a week. The primary OSRO's equipment is checked monthly or at a minimum of once every two months. Sunoco Pipeline has ensured by contract the availability of

personnel and equipment necessary to respond, to the maximum extent practicable, to a worst case discharge or a substantial threat of such discharge in this response zone.

An equipment list and list of trained personnel necessary to continue operation of the equipment and staff the oil spill removal organization for the first 7 days of a response for each of the OSRO contractors listed in **TABLE 2-5** is provided in **APPENDIX C**.

4.0 **RESPONSE ACTIVITIES**

Sunoco Logistics personnel will work in unison, following Incident Command protocols, to cooperate with and assist Fire, Police and other first responders with halting or redirecting traffic on roads and railroads in the affected area as appropriate.

In the event of a failure of a pipeline, the SXL H&S department will employ instrumentation (appropriate for the product contained in the pipeline at the time of failure) to access and determine the extent and coverage of a potential vapor cloud if present.

The instrumentation used in the determination will have the following capabilities:

Petroleum Products

- Combustible gas meter with 0-100% read out. Alarm calibrated to sound at 10% of LEL.
- Ability to quantify the following gases: O₂, H₂S, NO₂ and SO₂

LPG

- Photoionization Detector with the capabilities of detecting and quantifying ethane in air.

Note: All instrumentation regardless of product should be intrinsically safe.

4.1 Spill Response Actions. In the event of a spill, actions will be taken to protect personnel and public safety as well as the environment. The checklist provided below is an example of some of the activities conducted during a spill. Table 4-1 is an example of a Spill Response Checklist.

TABLE 4-1 – SPILL RESPONSE ACTION CHECKLIST

RESPONSE ACTION	PERSONNEL TAKING ACTION	DATE/TIME ACTION TAKEN
DOCUMENT ALL ACTIONS TAKEN		
First Person to Discover Spill		
Immediately notify Qualified Individual and Operations Control Center or posted emergency contacts. Take appropriate action to protect life and ensure safety of personnel.		
Immediately shut down terminal operations (if applicable). (b) (7)(F)		
Secure the scene. Isolate the area and assure the safety of people and the environment. Keep people away from the scene and outside the safety perimeter.		
Advise personnel in the area of any potential threat and/or initiate evacuation procedures.		

Qualified Individual		
Assume role of Incident Commander until relieved.		
Conduct preliminary assessment of health and safety hazards.		
Request medical assistance if an injury has occurred.		
Evacuate nonessential personnel, notify emergency response agencies to provide security, and evacuate surrounding area (if necessary).		
Make appropriate regulatory notifications. <ul style="list-style-type: none"> • National Response Center • Appropriate State Agency 		
Call out spill response contractors (See List in TABLE 2-5)		
If safe to do so, direct facility responders to shut down potential ignition sources in the vicinity of the spill, including motors, electrical pumps, electrical power, etc. Keep drivers away from truck rack if spill occurs there.		
If safe to do so, direct facility responders to shut down and control the source of the spill. Be aware of potential hazards associated with product and ensure that flammable vapor concentrations are within safe atmosphere before sending personnel into the spill area.		

RESPONSE ACTION	PERSONNEL TAKING ACTION	DATE/TIME ACTION TAKEN
Qualified Individual (Continued)		
If safe to do so, direct facility responders to stabilize and contain the situation. This may include berming or deployment of containment and/or sorbent boom.		
For low flash oil (<100°F), consider applying foam over the oil, using water spray to reduce vapors, grounding all equipment handling the oil, and using non-sparking tools.		
If there is a potential to impact shorelines, consider lining shoreline with sorbent or diversion boom to reduce impact.		
Notify Local Emergency Responders. Obtain the information necessary to complete the Accident Report - Hazardous Liquid Pipeline Systems (APPENDIX B) and phone this information to the HES Manager.		
On-Scene Coordinator		
Activate all or a portion of ERP (as necessary). Liaison Officer will maintain contact with notified regulatory agencies.		
Ensure the ERP has mobilized spill response contractors (if necessary). It is much better to demobilize equipment and personnel if not needed than to delay contacting them if they are needed.		

Document all response actions taken, including notifications, agency/media meetings, equipment and personnel mobilization and deployment, and area impacted.		
Water Based Spills: Initiate spill tracking and surveillance operations utilizing information in SECTION 4.2 . Determine extent of pollution via surveillance aircraft or vehicle. Estimate volume of spill utilizing information in SECTION 4.3 . Send photographer /videographer if safe.		
Land Based Spills: Initiate spill tracking and surveillance if applicable.		
SECONDARY RESPONSE ACTIONS (Refer to ERP job descriptions in APPENDIX D)		

4.2 Spill Tracking and Surveillance

The following guidelines should be utilized when tracking a spill and/or conducting spill surveillance:

- Surveillance of an oil spill should begin as soon as possible following discovery to enable response personnel to assess spill size, movement, and potential impact locations;
- Dispatch observers to crossings downstream or down gradient to determine the spill's maximum reach;
- Clouds, shadows, sediment, floating organic matter, submerged sand banks or wind-induced patterns on the water may resemble an oil slick if viewed from a distance;
- Sorbent pads may be used to detect oil or water;
- Use surface vessels to confirm the presence of any suspected oil slicks (if safe to do so); consider directing the vessels and photographing the vessels from the air, the latter to show their position and size relative to the slick;
- It is difficult to adequately observe oil on the water surface from a boat, dock, or shoreline;
- Spill surveillance is best accomplished through the use of helicopters or small planes; helicopters are preferred due to their superior visibility and maneuverability;
- If fixed-wing planes are to be used, high-wing types provide better visibility than low-wing types;
- All observations should be documented in writing and with photographs and/or videotapes;
- Describe the approximate dimensions of the oil slick based on available reference points (i.e. vessel, shoreline features, facilities); use the aircraft or vessel to traverse the length and width of the slick while timing each pass; calculate the approximate size and area of the slick by multiplying speed and time;
- Record aerial observations on detailed maps, such as topographic maps
- In the event of reduced visibility, such as dense fog or cloud cover, boats may have to be used to patrol the area and document the location and movements of the spill; however, this method may not be safe if the spill involves a highly flammable product;
- Surveillance is also required during spill response operations to gauge the effectiveness of response operations; to assist in locating skimmers; and to assess the spill's size, movement, and impact.

An example of a spill surveillance checklist is presented on **TABLE 4-2**.

TABLE 4-2 – SPILL SURVEILLANCE CHECKLIST

SPILL SURVEILLANCE CHECKLIST	
General Information	
Date:	Tidal or river stage (flood, ebb, slack, low water):
Time:	On-Scene Weather Conditions:
Incident Name:	Platform (helicopter, fixed-wing aircraft, boat, shore):
Observers Name:	Flight path/trackline:
Observers' Affiliation:	Altitude where observation taken:
Location of Source:	Areas not observed (i.e. foggy locations, restricted air spaces, shallow water areas):
Oil Observations	
Slick location(s):	Color and appearance (i.e. rainbow, dull or silver sheen, black or brown in color or mousse):
Slick dimensions:	Percent coverage:
Orientation of slick(s):	Is oil recoverable (Y/N)?:
Distribution of oil (i.e. windrows, streamers, pancakes or patches):	
Considerations	
<ul style="list-style-type: none"> • During surveillance, go beyond known impacted areas to check for additional oil spill sites • Include the name and phone number of the person making the observations • Clearly describe the locations where oil is observed and the areas where no oil has been seen 	
Other Observations	

4.3 Estimating Spill Volumes

Early in a spill response, estimation of spill volume is required in order to:

- Report to agencies
- Determine liquid recovery requirements
- Determine personnel and equipment requirements
- Estimate disposal and interim storage requirements

Some rapid methods to estimate spill size are:

- Transfer operations: Multiply the pumping rate by the elapsed time that the leak was in progress, plus the drainage volume of the line between the two closest valves or isolation points (volume loss = pump rate [bbls/min] x elapsed time [min] + line contents [bbl])
- Tank overfills: Elapsed time multiplied by the pumping rate
- Visual assessment of the surface area and thickness (**TABLE 4-3**); **this method may yield unreliable results because:**
 - Interpretation of sheen color varies with different observers
 - Appearance of a slick varies depending upon amount of available sunlight, sea-state, and viewing angle
 - Different products may behave differently, depending upon their properties

TABLE 4-3 - OIL THICKNESS ESTIMATION CHART

OIL THICKNESS ESTIMATIONS				
STANDARD FORM	Approx. Film Thickness		Approx. Quantity of Oil in Film	
	Inches	Millimeters	gallons/mile ²	liters/km ²
Barely Visible	0.0000015	0.00004	25	44
Silvery	0.000003	0.00008	50	88
Slightly Colored	0.000006	0.00015	100	179
Brightly Colored	0.000012	0.0003	200	351
Dull	0.00004	0.001	666	1,167
Dark	0.00008	0.002	1,332	2,237
Thickness of light oils: 0.0010 inches to 0.00010 inches				
Thickness of heavy oils: 0.10 inches to 0.010 inches				

4.4 Emergency Management Team

The Emergency Response Personnel (ERP) has been created and organized to plan for and manage emergencies. The ERPERP is composed of Company personnel from offices within the Area. Additional personnel from outlying offices can be used (if needed). The ERPERP will develop strategies and priorities for a response, then will supervise contractors, handle safety and security matters, and will provide logistical support for contractor personnel. The ERPERP will handle all communications with the media and the public. Job descriptions for each ERPERP member are provided in **APPENDIX D**. The ERP will train by participating in exercises as noted in **SECTION 6**.

Activation of the ERPERP may be accomplished in stages. Initially, the First Responder assumes the role of Incident Commander (IC). During a spill incident, the initial IC may be able to respond without assistance from the ERP. If the situation requires more resources, he may request additional personnel or management support from the ERP. This request is made to the Qualified Individual (QI). Depending on the situation, the QI may then assume the role of Incident Commander. The QI would then call out the other ERP members. The ERP activation procedure is provided in **APPENDIX D**.

4.5 Incident Command System/Unified Command

The Incident Command System (ICS) will be used by the Company ERP for spill response. The ERP organization chart is provided in **APPENDIX D** and can be expanded or contracted as necessary.

The Unified Command System (UCS) is the accepted method of organizing key spill management entities within the Incident Command System. The primary entities include:

- Federal On-Scene Coordinator (FOSC)
- State On-Scene Coordinator (SOSC)
- Company Incident Commander

These three people share decision-making authority within the Incident Command System and are each responsible for coordinating other federal, state, and company personnel to form an effective integrated Emergency Management Team. Refer to **APPENDIX D** for detailed checklists of the ERP roles and responsibilities as well as organizational interfaces with external parties.

5.0 TRAINING PROCEDURES

5.1 Exercise Requirements and Schedules

The Company participates in the National Preparedness for Response Exercise Program (PREP) in order to satisfy the exercise requirements of the RSPA and EPA, following the Sunoco Logistics "PREP Training & Record Guide, EPP-101.

The Facility Manager is responsible for the following aspects:

- Scheduling
- Maintaining records
- Implementing
- Evaluation of the Company's training and exercise program
- Post-drill evaluation improvements

5.2 Post Incident Review

In the case of the following spills from a 49 CFR Part 195 regulated pipeline, a Standard Incident Debriefing Form as noted in **TABLE 5-1** will be completed:

- Any spill resulting in an explosion or fire
- Any spill resulting in the death of any person
- Any spill resulting in an injury requiring inpatient hospitalization
- Any spill impacting a lake, reservoir, stream, river or similar body of water
- Any spill resulting in more than \$50,000.00 in damage including the cost of damage to facilities, spill cleanup, emergency response, value of lost product and damage to property

In the case of spills from other facilities a Standard Incident Debriefing Form as noted in **TABLE 5.1** will be completed on an as determined basis which will be dictated by individual circumstances.

Pertinent facility personnel involved in the incident shall be debriefed (by the Company) within the calendar quarter after termination of operations. A Standard Incident Debriefing Form is provided in **TABLE 5.1**. The primary purpose of the post-incident review is to identify actual or potential deficiencies in the Plan and determine the changes required to correct the efficiencies.

The post-incident review is also intended to identify which response procedures, equipment, and techniques were effective and which were not and the reason(s) why. This type of information is very helpful in the development of a functional Plan by eliminating or modifying those response procedures that are less effective and emphasizing those that are highly effective. This process should also be used for

evaluating training drills or exercises. Key agency personnel that were involved in the response may be invited to attend the post-incident review.

TABLE 5-1 – EXERCISE/INCIDENT RESPONSE SELF ASSESSMENT FORM

#

/170-11: _____

#

Date: _____

Check as appropriate

Type of Exercise:

Table Top Drill Equipment Deployment Emergency Procedures Actual Spill

Exercise was: Announced Unannounced

Scenario: Average Most Probable Maximum Most Probable Worst Case

Section I. Summary of Exercise/Incident: If documenting a tabletop exercise attach a copy of the exercise scenario. If documenting an actual spill incident or equipment deployment, describe the event. Attach additional pages if necessary or refer to IMPACT report.
 Note: Include additional pages if necessary.

Participants/Evaluation Team	Company

(Attach roster sheet if required)

Qualified Individuals:

Date Evaluation Conducted: _____

Section II. Exercise / Incident Response Evaluation

Check Off Plan Components Exercised:	
<input type="checkbox"/> Notifications	<input type="checkbox"/> Protection
<input type="checkbox"/> Staff Mobilization	<input type="checkbox"/> Disposal
<input type="checkbox"/> Ability to Operate within ICS	<input type="checkbox"/> Communications
<input type="checkbox"/> Discharge Control	<input type="checkbox"/> Transportation
<input type="checkbox"/> Assessment	<input type="checkbox"/> Personnel Support
<input type="checkbox"/> Containment	<input type="checkbox"/> Equipt Maint/Support
<input type="checkbox"/> Recovery	<input type="checkbox"/> Procurement
	<input type="checkbox"/> Documentation

Describe How the Following Objectives Were Exercised: (5 is excellent)

Knowledge of Facility Response Plan 1 2 3 4 5

Comments:

- Was the Plan used during the response?
- Was the Plan referenced during the response?
- Was the information in the plan accurate?
- What changes to the Plan are recommended?

Notification Phase: 1 2 3 4 5

Comments:

- Were the numbers in the Plan correct?
- Were their any numbers missing from the Plan?
- Were notifications made in a timely manner?
- Are any corrections to the Plan necessary?

Communications system: 1 2 3 4 5

Comments:

- Were operational units able to communicate directly with the ICS team?
- Could the ICS team communicate efficiently with all necessary parties?
- Did communication abilities affect decision making?
- Were the frequency of update meetings adequate?

Response Efforts: 1 2 3 4 5

Comments:

- Were SXL response actions done in a timely manner?
- Were resources requested in a timely manner?
- Were adequate SXL resources available in a timely manner?
- What if any improvements could be made?
- Did information get properly communicated during the update meetings?
- Was the ICS team established in a timely manner?
- Was the ICS team properly staffed?

OSRO Performance : 1 2 3 4 5
 Comments:
 Did the OSRO respond in a timely manner?
 Did the OSRO respond with the proper resources?
 Did the OSRO have enough resources?
 Was the OSRO's performance adequate?
 Were the OSRO's personnel knowledgeable in their assigned tasks?
 Was the OSRO's equipment in good working order?

Coordination with Agencies: 1 2 3 4 5
 Comments:
 Did regulatory agencies come to the spill site?
 Did regulatory agencies call about the spill?
 Who from the ICS team interacted with the agencies?
 Were all of the appropriate agencies notified?
 Who made the agency notification?
 Was all of the needed information made available to the person making the notification?

Ability to access sensitive area information 1 2 3 4 5
 Comments:
 Did the plan contain all of the available sensitive information needed?
 Was the sensitive area information available to the people in the field?
 Are updates to the sensitive information required?

Section III. Corrective Actions

<u>ITEM</u>	<u>Responsibility</u>	<u>Estimated Completion</u>

Note: Include additional pages if necessary

5.3 Training Program

Training requirements are presented in Table 5-2, below:

TABLE 5-2 – TRAINING REQUIREMENTS

Training Type	Training Characteristics
Training in Use of Oil Spill Plan	<ul style="list-style-type: none"> • All field personnel will be trained to properly report/monitor spills • Plan will be reviewed annually with all employees and contract personnel • A record of Personnel Response Training will be maintained.
OSHA Training Requirements	<ul style="list-style-type: none"> • All Company responders designated in Plan must have 24 hours of initial spill response training <ul style="list-style-type: none"> • Laborers having potential for minimal exposure must have 24 hours of initial oil spill response instruction and 8 hours of actual field experience • Spill responders having potential exposure to hazardous substances at levels exceeding permissible exposure limits must have 40 hours of initial training offsite and 24 hours of actual field experience • On-site management/supervisors required to receive same training as equipment operators/general laborers plus 8 hours of specialized hazardous waste management training • Managers/employees require 8 hours of annual refresher training
Spill Management Team Personnel Training	<ul style="list-style-type: none"> • Will follow EPP-101
Training for Casual Laborers or Volunteers	<ul style="list-style-type: none"> • Company will not use casual laborers/volunteers for operations requiring HAZWOPER training
Wildlife	<ul style="list-style-type: none"> • Only trained personnel approved by USFWS and appropriate state agency will be used to treat oiled wildlife
Training Documentation and Record Maintenance	<ul style="list-style-type: none"> • Training activity records will be retained five years for all personnel following completion of training • Company will retain training records indefinitely for individuals assigned specific duties in Plan • Training records will be retained.

Training Type	Training Characteristics
Emergency Response Training	<p>The Company has established and conducts a continuing training program to instruct emergency response personnel to:</p> <ul style="list-style-type: none"> • Carry out emergency procedures established under 195.402 that relate to their assignments; • Know the characteristics and hazards of the hazardous liquids or carbon dioxide transported, including, in case of flammable HVL, flammability of mixtures with air, odorless vapors, and water reactions; • Recognize conditions that are likely to cause emergencies, predict the consequences of facility malfunctions or failures and hazardous liquids or carbon dioxide spills, and take appropriate corrective action; • Take steps necessary to control any accidental release of hazardous liquid or carbon dioxide and to minimize the potential for fire, explosion, toxicity, or environmental damage; and • Learn the proper use of fire-fighting procedures and equipment, fire suits, and breathing apparatus by utilizing, where feasible, a simulated pipeline emergency condition. <p>At intervals not exceeding 15 months, but at least once each calendar year, the Company shall:</p> <ul style="list-style-type: none"> • Review with personnel their performance in meeting the objectives of the emergency response training program set forth in 195.403(a), and • Make appropriate changes to the emergency response training program as necessary to ensure that it is effective. <p>The Company requires and verifies that its supervisors maintain a thorough knowledge of that portion of the emergency response procedures established under 195.402 for which they are responsible to ensure compliance.</p>

Training Type	Training Characteristics
<p>Minimum requirements for Operator Qualification of individuals performing covered tasks on a pipeline</p>	<p>The Company maintains a written Operator Qualification program that includes provisions to:</p> <ul style="list-style-type: none"> • Identify covered tasks; • Ensure through evaluation that individuals performing covered tasks are qualified; • Allow individuals that are not qualified pursuant to 49 CFR 195 Subpart G to perform a covered task if directed and observed by an individual that is qualified; • Evaluate an individual if the operator has reason to believe that the individual's performance of a covered task contributed to an accident as defined in Part 195; • Evaluate an individual if the operator has reason to believe that the individual is no longer qualified to perform a covered task; • Communicate changes that affect covered tasks to individuals performing these covered tasks; and • Identify those covered tasks and the intervals at which evaluation of the individual's qualifications is needed. <p>RECORDS</p> <p>Each operator shall maintain records that demonstrate compliance with 49 CFR Part 195, Subpart G. Qualification records shall include:</p> <ul style="list-style-type: none"> • Identification of qualified individuals • Identification of covered tasks the individual is qualified to perform • Date(s) of current qualification <p>Records supporting an individual's current qualification shall be maintained while the individual is performing the covered task. Records of prior qualification and records of individuals no longer performing covered tasks shall be retained for a period of five years.</p>
Breathing	<ul style="list-style-type: none"> • HES Respiratory Protection Training
Exposure	<p>Personal Protective Equipment</p> <ul style="list-style-type: none"> • HES Personal Protective Equipment • Emergency Response Guidebook: Purpose and Uses • Hazard Communication - Generic KW course • HES HAZCOM (face -2-face)
MX6 Instrument	<ul style="list-style-type: none"> • HES MX6 Gas Meter User Training • HES Operation and Maintenance of Monitoring Equipment

Fit-Testing	<ul style="list-style-type: none"> • HES Respirator Fit-Testing
<p>HES Emergency Response Plan Review (SPCC, FRC, State Plan) This is face-2-face area specific training.</p>	<p>HAZWOPER Awareness - Generic KW course</p> <ul style="list-style-type: none"> • Emergency Response Guidebook: Purpose and Uses • Hazard Communication - Generic KW course • HES HAZCOM (face -2-face) • PREP Emergency Response Plan Review

6.0 WORST CASE DISCHARGE SUMMARY

6.1 Worst Case Discharge Scenario

The equipment and personnel to respond to a spill are available from several sources and are provided with the equipment and contractors in **TABLE 2.5**. The following sections are discussions of these scenarios.

Worst case discharge calculations are provided in **SECTION 6.3**.

Upon discovery of a spill, the following procedures would be followed:

1. The First Responder would notify the Area Supervisor/Manager of Operations and Operations Control Center and notifications would be initiated in accordance with **SECTION 2.0**.
2. The Area Supervisor/Manager of Operations would assume the role of Incident Commander/Qualified Individual until relieved and would initiate response actions and notifications in accordance with **SECTION 2.0**. If this were a small spill, the local/company personnel may handle all aspects of the response. Among those actions would be to:
 - Conduct safety assessment and evacuate personnel as needed in accordance with **SECTION 3.2**
 - Direct facility responders to shut down ignition sources
 - Direct facility personnel to position resources in accordance with **SECTION 4.0** and **SECTION 7.0**
 - Complete spill report form provided in **APPENDIX B**
 - Ensure regulatory agencies are notified
3. If this were a small or medium spill, the Qualified Individual/Incident Commander may elect for the First Responder to remain the Incident Commander or to activate selected portions of the Emergency Management Team. However, for a large spill, the Qualified Individual would assume the role of Incident Commander and would activate the entire Emergency Management Team in accordance with activation procedures described in **SECTION 4.4**.
4. The Incident Commander would then initiate spill assessment procedures including surveillance operations, trajectory calculations, and spill volume estimating in accordance with **SECTIONS 4.2 and 4.3**.

5. The Incident Commander would then utilize checklists in **SECTION 4.0** as a reminder of issues to address. The primary focus would be to establish incident priorities and objectives and to brief staff accordingly.
6. The Emergency Management Team would develop the following plans, as appropriate (some of these plans may not be required during a small or medium spill):
 - Site Safety and Health
 - Site Security
 - Incident Action
 - Decontamination
 - Disposal
 - Demobilization
7. The response would continue until an appropriate level of cleanup is obtained.

6.2 Planning Volume Calculations

Once the worst case discharge volume has been calculated, response resources must be identified to meet the requirements of 49 CFR 194.105(b). Calculations to determine sufficient amount of response equipment necessary to respond to a worst case discharge are described below. A demonstration of the planning volume calculations is provided below.

DOT/PHMSA Portion of Pipeline/Facilities

The worst case discharge (WCD) for the DOT portion of the pipeline and facilities, as defined in 49 CFR 194.105(b), as the largest volume of the following:

1. The pipeline's maximum shut-down response time in hours (based on historic discharge data or in the absence of such data, the operators best estimate), multiplied by the maximum flow rate expressed in barrels per hour (based on the maximum daily capacity of the pipeline), plus the largest drainage volume after shutdown of the line section(s) in the response zone expressed in barrels; or
2. The largest foreseeable discharge for the line section(s) within a response zone, expressed in barrels (cubic meters), based on the maximum historic discharge, if one exists, adjusted for any subsequent corrective or preventative action taken; or
3. If the response zone contains one or more breakout tanks, the capacity of the single largest tank or battery of tanks within a single secondary containment system, adjusted for the capacity or size of the secondary containment system, expressed in barrels.

Under PHMSA's current policy, operators are allowed to reduce the worst case discharge volume derived from 49 CFR 194.105(b)(3) by no more than 75% if an operator is taking certain spill prevention measures for their breakout tanks and presents supporting information in the response plan. An operator can reduce the worst case discharge volume based on breakout tanks in the response zones as follows:

TABLE 6-1 PHMSA PERCENT REDUCTION ALLOWED

SPILL PREVENTION MEASURES	PERCENT REDUCTION ALLOWED
Secondary containment capacity greater than 100% capacity of tank and designed according to NFPA 30	50%
Tank built, rebuilt, and repaired according to API Std 620/650/653	10%
Automatic high-level alarms/shutdowns designed according to NFPA/API RP 2350	5%
Testing/cathodic protection designed according to API Std 650/651/653	5%
Tertiary containment/drainage/treatment per NFPA 30	5%*
Maximum allowable credit or reduction	50%

Note: * - The tanks do not have tertiary containment

The worst case discharge for the response zone was based on the largest volume of the three criteria given above.

The Company has determined the worst case discharge volume to be a catastrophic line failure of the largest line section with the greatest drainage capacity in each response zone or 30 percent of the volume of the largest tank in each zone.

The line sections with the highest throughput and largest drainage volume between block valves on pump stations were chosen to calculate the pipeline worst case discharge. Although the entire discharge volume of each line was used for the worst case discharge, in an actual spill event, it would take days to drain the line completely. The line would be sealed early in the response effort. The calculated worst case discharge may not be a credible release scenario.

All of the breakout tanks in the pipeline system are within adequate secondary containment, therefore, the discharge volumes for the largest tank were determined by adjusting the total tank volume downward by 50% per the company guidelines.

Considering the volume of release from a line break compared to that of historic discharge in each zone and to the volumes released from a tank failure, the tank failure was found to represent the worst case scenario.

The maximum historic discharge is not applicable for WCD covered by this plan. Given below are the tank and pipeline WCD calculations for this plan. The worst case discharge for each pipeline segment is the largest breakout tank. These tank volumes are as follows:

LOCATION	VOLUME (BBLs)
(b) (7)(F)	

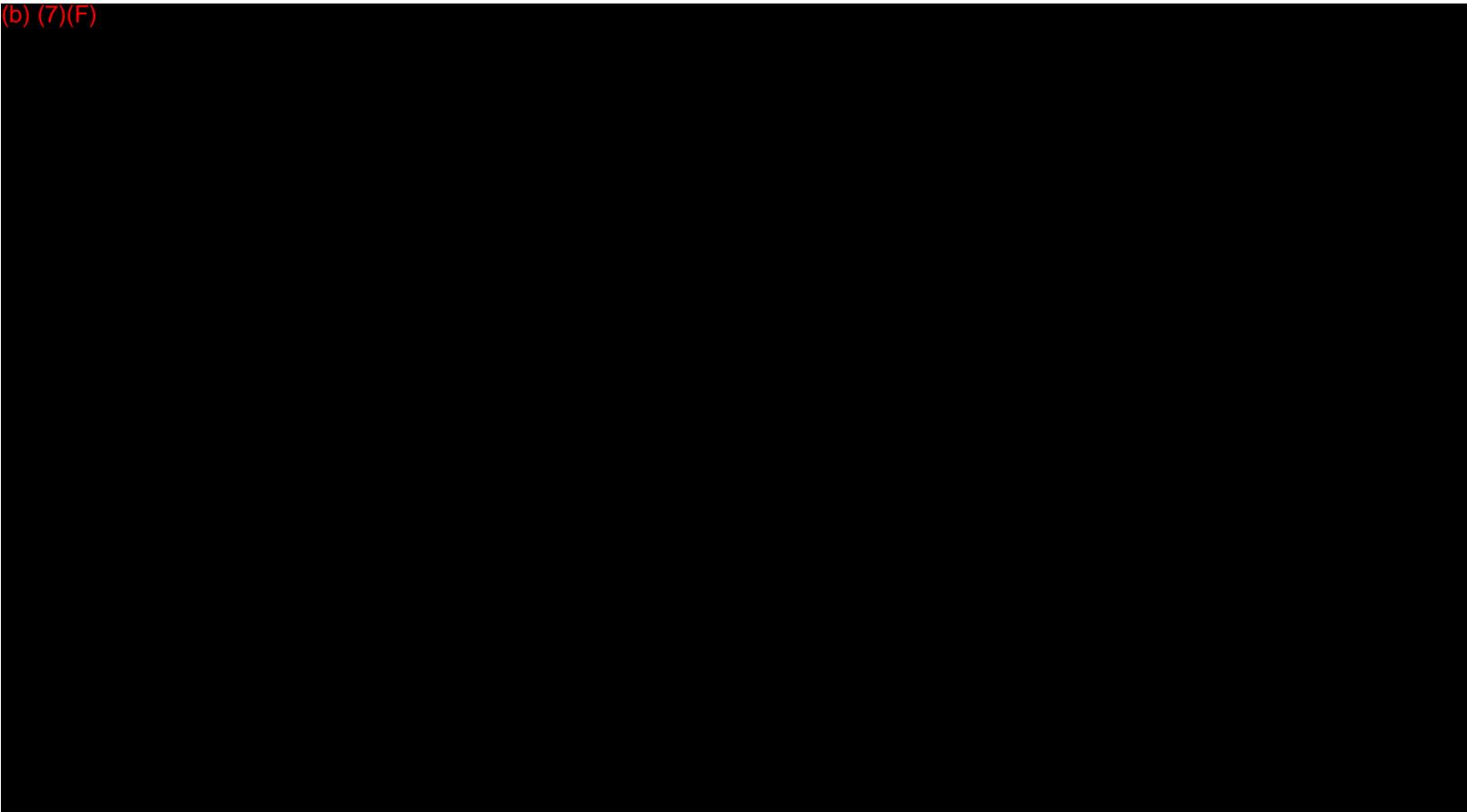
6.3 Worst Case Discharge Volume Calculations

The worst case tank volume is calculated as follows:

Largest Tank X Credit for Containment Tank Standards = Tank Standards Credit

The Company has implemented all of the spill prevention measures listed on the previous page, except tertiary containment. Therefore, the percent reduction allowed for credit equals 50% and the worst case discharge volume is 50% of the total volume.

(b) (7)(F)



6.4 Product Characteristics and Hazards

Pipeline systems described in this plan may transport various types of commodities including but not limited to:

- Finished Petroleum Products
- LPG products (ethane)

The key chemical and physical characteristics of each of these oils and/or other small quantity products/chemicals are identified in **TABLE 6-2**, below.

TABLE 6-2 CHEMICAL AND PHYSICAL CHARACTERISTICS

COMMON NAME	MSDS NAME	HEALTH HAZARD	FLASH POINT	SPECIAL HAZARD	REACTIVITY	HEALTH HAZARD WARNING STATEMENT
Crude Oil	Appropriate Product Name	1	3	C, H2S	0	May Contain benzene, a carcinogen, or hydrogen sulfide, which is harmful if inhaled; flashpoint varies widely.
Fuel Oil	Fuel Oil 2; Road Diesel; Home Heating Oil; Low Sulfur Diesel (LSD); Ultra Low Sulfur Diesel(ULSD)	0	2	C	0	Long term, repeated exposure may cause skin cancer.
Gasoline	Unleaded Gasoline; Transmix	1	4	C	0	Long term, repeated exposure may cause cancer, blood, kidney and nervous system damage, and contains benzene.
Jet Fuel	Kerosene; Aviation Fuel; Jet-A; JP-5; JP-8; Aviation Gas	1	2	C	0	Long term, repeated exposure may cause cancer.
Ethane	Ethane	1	4	A, P	0	Easily ignited and will form explosive mixtures with air; may cause dizziness or asphyxiation; toxic if inhaled at high concentrations; skin contact with gas or liquid may cause burns; fire may produce irritating or toxic gases
Health Hazard	4 = Extremely Hazardous 3 = Hazardous 2 = Warning 1 = Slightly Hazardous 0 = No Unusual Hazard			Fire Hazard (Flash Point)	4 = Below 73° F, 22° C 3 = Below 100° F, 37° C 2 = Below 200° F, 93° C 1 = Above 200° F, 93° C 0 = Will not burn	

Special Hazard	A = Asphyxiant C = Contains Carcinogen W = Reacts with Water Y = Radiation Hazard COR = Corrosive OX = Oxidizer H2S = Hydrogen Sulfide P = Under Pressure T = Hot Material	Reactivity Hazard	4 = May Detonate at Room Temperature 3 = May Detonate with Heat or Shock 2 = Violent Chemical Change with High Temperature and Pressure 1 = Not Stable if Heated 0 = Stable
-----------------------	---	--------------------------	--

7.0 RESPONSE ZONE MAPS AND ASSOCIATED REFERENCE MATERIAL

7.1 Map Overview

The District Overview Map and multiple Pipeline Sensitivity Maps are presented in **APPENDIX E**. The District Overview map includes the entire Cleveland Response Zone and illustrates the eighteen (18) Pipeline Sensitivity Map locations.

The pipeline sensitivity maps indicate the locations of the worst case discharge, distance between each line section in the response zone, public drinking water intakes within 5 miles of any pipeline segment, and any potentially environmentally sensitive areas located within 1 mile of any pipeline segment.

The following maps are included in this section:

- Cleveland District Overview Map

A Pipeline Map Feature Index Table, **TABLE E.1**, is presented following the maps. The Pipeline Map Feature Index Table provides an explanation of potentially sensitive areas that are numerically coded on the Pipeline Sensitivity Maps.

8.0 RESPONSE PLAN REVIEW AND UPDATE PROCEDURES

8.1 Facility Response Plan Review Guidelines

In accordance with 49 CFR Part 194.121, this Plan will be reviewed annually and modified to address new or different operating conditions or information included in the Plan. Upon review of the response plan for each five-year period, revisions will be submitted to PHMSA provided the changes to the current plan are needed. If revisions are not needed, a letter stating that the plan is still current will be submitted to PHMSA.

Company internal policy states that the Plan will be reviewed at least annually and modified as appropriate. In the event the Company experiences a Worst Case Discharge, the effectiveness of the plan will be evaluated and updated as necessary. If a new or different operating condition or information would substantially affect the implementation of the Plan, the Company will modify the Plan to address such a change and, within 30 days of making such a change, submit the change to PHMSA. Examples of changes in operating conditions that would cause a significant change to the Plan include the following:

CONDITIONS REQUIRING REVISIONS AND SUBMISSIONS

- Relocation or replacement of the transportation system in a way that substantially affects the information included in the Plan, such as a change to the Worst Case Discharge volume.
- A change in the type of oil handled, stored, or transferred that materially alters the required response resources.
- A change in key personnel (Qualified Individuals).
- A change in the name of the Oil Spill Removal Organization (OSRO).
- Any other changes that materially affect the implementation of the Plan.
- A change in the National Oil and Hazardous Substances Pollution Contingency Plan or Area Contingency Plan that has significant impact on the equipment appropriate for response activities.

All requests for changes must be made through the Facility Manager and will be submitted to PHMSA by the Emergency Planning and Preparedness Group.

APPENDIX A
PHMSA CROSS REFERENCE MATRIX

TABLE A.1 - DOT/PHMSA CROSS REFERENCE MATRIX

OPA 90 REQUIREMENTS (49 CFR 194)	LOCATION
Information Summary (Section 1)	
<ul style="list-style-type: none"> • For the core plan: 	N/A
<ul style="list-style-type: none"> • Name and address of operator 	SECTION 1.1
<ul style="list-style-type: none"> • For each Response Zone which contains one or more line sections that meet the criteria for determining significant and substantial harm (§194.103), listing and description of Response Zones, including county(s) and state(s) 	TABLE 1.2
<ul style="list-style-type: none"> • For each Response Zone appendix: 	N/A
<ul style="list-style-type: none"> • Information summary for core plan 	SECTION 1.1
<ul style="list-style-type: none"> • QI names and telephone numbers, available on 24-hr basis 	TABLE 1.1
<ul style="list-style-type: none"> • Description of Response Zone, including county(s) and state(s) in which a worst case discharge could cause substantial harm to the environment 	TABLE 1.1, TABLE 1.2
<ul style="list-style-type: none"> • List of line sections contained in Response Zone, identified by milepost or survey station or other operator designation 	TABLE 1.2
<ul style="list-style-type: none"> • Basis for operator's determination of significant and substantial harm 	TABLE 1.2
<ul style="list-style-type: none"> • The type of oil and volume of the worst case discharge 	TABLE 1.2, SECTION 6.0
<ul style="list-style-type: none"> • Certification that the operator has obtained, through contract or other approved means, the necessary private personnel and equipment to respond, to the maximum extent practicable, to a worst case discharge or threat of such discharge 	SECTION 1.3
Notification Procedures (Section 2)	
<ul style="list-style-type: none"> • Notification requirements that apply in each area of operation of pipelines covered by the plan, including applicable state or local requirements 	SECTION 2
<ul style="list-style-type: none"> • Checklist of notifications the operator or Qualified Individual is required to make under the response plan, listed in the order of priority 	TABLE 2.2, TABLE 2.3
<ul style="list-style-type: none"> • Name of persons (individuals or organizations) to be notified of discharge, indicating whether notification is to be performed by operating personnel or other personnel 	TABLE 2.2, TABLE 2.3
<ul style="list-style-type: none"> • Procedures for notifying Qualified Individuals 	SECTION 2.1, TABLE 2.2
<ul style="list-style-type: none"> • Primary and secondary communication methods by which notifications can be made 	TABLE 2.3

OPA 90 REQUIREMENTS (49 CFR 194)	LOCATION
<ul style="list-style-type: none"> • Information to be provided in the initial and each follow-up notification, including the following: <ul style="list-style-type: none"> • Name of pipeline • Time of discharge • Location of discharge • Name of oil recovered • Reason for discharge (e.g. material failure, excavation damage, corrosion) • Estimated volume of oil discharged • Weather conditions on scene • Actions taken or planned by persons on scene 	SECTION 2.2
Spill Detection and On-Scene Spill Mitigation Procedures (Section 3)	
<ul style="list-style-type: none"> • Methods of initial discharge detection 	SECTION 3.1
<ul style="list-style-type: none"> • Procedures, listed in order of priority, that personnel are required to follow in responding to a pipeline emergency to mitigate or prevent any discharge from the pipeline 	SECTION 3.2, TABLE 3.1
<ul style="list-style-type: none"> • List of equipment that may be needed in response activities based on land and navigable waters including: <ul style="list-style-type: none"> • Transfer hoses and pumps • Portable pumps and ancillary equipment • Facilities available to transport and receive oil from a leaking pipeline • Identification of the availability, location, and contact phone numbers to obtain equipment for response activities on a 24-hour basis • Identification of personnel and their location, telephone numbers, and responsibilities for use of equipment in response activities on a 24-hour basis 	SECTION 3.3, APPENDIX C
Response Activities (Section 4)	
<ul style="list-style-type: none"> • Responsibilities of, and actions to be taken by, operating personnel to initiate and supervise response actions pending the arrival of the Qualified Individual or other response resources identified in the response plan 	SECTION 4.1, TABLE 4.1
<ul style="list-style-type: none"> • Qualified Individual's responsibilities and authority, including notification of the response resources identified in the response plan 	SECTION 4.1, TABLE 4.1
<ul style="list-style-type: none"> • Procedures for coordinating the actions of the operator or Qualified Individual with the action of the OSC responsible for monitoring or directing those actions 	TABLE 4.1
<ul style="list-style-type: none"> • Oil spill response organizations (OSRO) available through contract or other approved means, to respond to a worst case discharge to the maximum extent practicable 	TABLE 2.5, APPENDIX C

OPA 90 REQUIREMENTS (49 CFR 194)	LOCATION
<ul style="list-style-type: none"> • For each organization identified under paragraph (d), a listing of: <ul style="list-style-type: none"> • Equipment and supplies available • Trained personnel necessary to continue operation of the equipment and staff the oil spill removal organization for the first seven days of the response 	APPENDIX C
List of Contacts (Section 5)	
<ul style="list-style-type: none"> • List of persons the Plan requires the operator to contact 	TABLE 1.1, TABLE 2.1
<ul style="list-style-type: none"> • Qualified individuals for the operator areas of operation 	TABLE 1.1
<ul style="list-style-type: none"> • Applicable insurance representatives or surveyors for the operator's areas of operation 	TABLE 1.1
<ul style="list-style-type: none"> • Persons or organizations to notify for activation of response resources 	TABLE 2.1, TABLE 2.2, TABLE 2.4
Training Procedures (Section 6)	
<ul style="list-style-type: none"> • Description of training procedures and programs of the operations 	SECTION 5
Drill Procedures (Section 7)	
<ul style="list-style-type: none"> • Announced and unannounced drills 	TABLE 5.2
<ul style="list-style-type: none"> • Types of drills and their frequencies; for example: <ul style="list-style-type: none"> • Manned pipeline emergency procedures and qualified individual notification drills conducted quarterly • Drills involving emergency actions by assigned operating or maintenance personnel and notification of qualified individual on pipeline facilities which are normally unmanned, conducted quarterly • Shore-based spill management team (SMT) tabletop drills conducted yearly • Oil spill removal organization field equipment deployment drills conducted yearly • A drill that exercises entire response plan for each Response Zone, would be conducted at least once every three years 	TABLE 5.2
Response Plan Review and Update Procedures (Section 8)	
<ul style="list-style-type: none"> • Procedures to meet §194.121 	SECTION 8.1
<ul style="list-style-type: none"> • Procedures to review plan after a worst case discharge and to evaluate and record the plan's effectiveness 	SECTION 8.1
Response Zone Appendices (Section 9)	
<ul style="list-style-type: none"> • Name and telephone number of the qualified individual 	TABLE 1.1

<ul style="list-style-type: none"> Notification procedures 	SECTION 2
OPA 90 REQUIREMENTS (49 CFR 194)	LOCATION
<ul style="list-style-type: none"> Spill detection and mitigation procedures 	SECTION 3.0
<ul style="list-style-type: none"> Name, address, and telephone number of oil spill response organizations 	TABLE 2.5
<ul style="list-style-type: none"> Response activities and response resources including— <ul style="list-style-type: none"> Equipment and supplies necessary to meet §194.115, and The trained personnel necessary to sustain operation of the equipment and to staff the oil spill removal organization and spill management team for the first 7 days of the response 	TABLE 2.5, APPENDIX C
<ul style="list-style-type: none"> Names and telephone numbers of Federal, state and local agencies which the operator expects to assume pollution response responsibilities 	TABLE 2.3, TABLE 2.4
<ul style="list-style-type: none"> The worst case discharge volume 	SECTION 6.0
<ul style="list-style-type: none"> The method used to determine the worst case discharge volume, with calculations 	SECTION 6.3
<ul style="list-style-type: none"> A map that clearly shows: <ul style="list-style-type: none"> Location of worst case discharge Distance between each line section in the Response Zone: <ul style="list-style-type: none"> Each potentially affected public drinking water intake, lake, river, and stream within a radius of five miles of the line section Each potentially affected environmentally sensitive area within a radius of one mile of the line section 	APPENDIX E
<ul style="list-style-type: none"> Piping diagram and plan-profile drawing of each line section; (may be kept separate from the response plan if the location is identified) 	APPENDIX E
<ul style="list-style-type: none"> For every oil transported by each pipeline in the response zone, emergency response data that: <ul style="list-style-type: none"> Include name, description, physical and chemical characteristics, health and safety hazards, and initial spill handling and firefighting methods Meet 29 CFR 1910.1200 or 49 CFR 172.602 	SECTION 6.4

APPENDIX B
NOTIFICATION FORMS AND GUIDELINES

OHIO ENVIRONMENTAL PROTECTION AGENCY DISTRICT OFFICES

Northwest District
347 North Dunbridge Road
Bowling Green, OH 43402
(419) 352-8461

Northeast District
2110 East Aurora Road
Twinsburg, OH 44087
(330) 963-1200



Southwest District
401 East Fifth Street
Dayton, OH 45402
(937) 285-6357

Central Ohio Unit
122 South Front Street
Columbus, OH 43215
(614) 728-3778

Southeast District
2195 Front Street
Logan, OH 43138
(740) 385-8501

Ohio Local Emergency Planning Committee Information and Emergency Coordinators by County

NOTE: This list contains the 24-hour emergency telephone numbers of LEPC Emergency Coordinators (as of 10/1/00). These numbers are to be used only to report reportable spills/releases to local officials. In the majority of cases, the 24-hour number is a dispatching number (eg. Sheriff's Dept./Fire Dept./Police). Please do not call the 24-hour emergency number for general program questions or issues. This is only an emergency incident reporting telephone number.

NOTE: Questions about annual chemical inventory reports or filing fees should be directed to the information coordinator of your planning district (see below) or a state representative of the SERC (614-644-2260) or 1-888-644-2260 (toll free).

ADAMS COUNTY LEPC

INFORMATION COORDINATOR
Paul Howelett
Adams Cnty. EMA Dir.
116 W. Mulberry St.
West Union, OH 45693
(937) 544-6123

EMERGENCY COORDINATOR
Paul Howelett
Adams Cnty. EMA Dir.
116 W. Mulberry St.
W. Union, OH 45693
(937) 544-6123 (DAY)
(937) 544-2314 (24-HR)

ALLEN COUNTY LEPC

INFORMATION COORDINATOR
Russell Decker
Allen Cnty. EMA Director
P. O. Box 1243/333 N. Main St.
Lima, OH 45802
(419) 993-1404

EMERGENCY COORDINATOR
Russell Decker
Allen Cnty. EMA Director
P. O. Box 1243/333 N. Main St.
Lima, OH 45802
(419) 993-1404 (DAY)
(419) 227-3535 (24-HR)

ASHLAND COUNTY LEPC

INFORMATION COORDINATOR
Mike Wolfson
Ashland Cnty. Regional Planning
110 Cottage St.
Ashland, OH 44805
(419) 282-4262

EMERGENCY COORDINATOR
Mark Burgess
Ashland City Fire Chief
274 Cleveland Ave.
Ashland, OH 44805
(419) 289-6511 (DAY)
(419) 289-2911 (24-HR)

ASHTABULA COUNTY LEPC

INFORMATION COORDINATOR
Dannette Ingersoll
Ashtabula Cnty. EMA Secretary
25 W. Jefferson St.
Jefferson, OH 44047
(440) 576-9148

EMERGENCY COORDINATOR
Gary Bolender
Ashtabula Cnty. EMA
25 W. Jefferson St.
Jefferson, OH 44047
(440) 576-9148 (DAY)
(440) 576-0055 (24-HR)

ATHENS COUNTY LEPC

INFORMATION COORDINATOR
L.D. Bentley
Athens Cnty. EMA
13 W. Washington St.
Athens, OH 45701-2433
(740) 592-3247

EMERGENCY COORDINATOR
L.D. Bentley
Athens Cnty. EMA
13 W. Washington St.
Athens, OH 45701-2433
(740) 592-3274 (DAY)
(740) 592-3274 (24-HR)

AUGLAIZE COUNTY LEPC

INFORMATION COORDINATOR
James Ashman
Auglaize Cnty. Info. Coord.
201 S. Willipie-Suite G-8
Wapakoneta, OH 45895
(419) 738-9637

EMERGENCY COORDINATOR
Dennis Mallory
Auglaize Cnty. LEPC
201 S. Willipie-Suite G-8
Wapakoneta, OH 45895
(419) 738-9637 (DAY)
(419) 738-9637 (24-HR)

BELMONT COUNTY LEPC

INFORMATION COORDINATOR
Richard Quinlin
Belmont Cnty. EMA Dir.
68329 Bannock Rd.
St. Clairsville, OH 43950
(740) 695-5984

EMERGENCY COORDINATOR
Richard Quinlin
Belmont Cnty. EMA Dir.
68329 Bannock Rd.
St. Clairsville, OH 43950
(740) 695-5984 (DAY)
(740) 699-0425 (24-HR)

BROWN COUNTY LEPC

INFORMATION COORDINATOR
Jane Cahall
Brown Cnty. EMA Director
800 Mt. Orab Pike
Georgetown, OH 45121
(937) 378-5100

EMERGENCY COORDINATOR

Jane Cahall
Brown Cnty. EMA Director
800 Mt. Orab Pike
Georgetown, OH 45121
(937) 378-5100 (DAY)
(937) 378-4155 (24-HR)

BUTLER COUNTY LEPC**INFORMATION COORDINATOR**

William Turner
Butler Cnty. EMA Dir.
315 High St., 6th Floor
Hamilton, OH 45011
(513) 785-5810

EMERGENCY COORDINATOR

William Turner
Butler Cnty. EMA Dir.
315 High St., 6th Floor
Hamilton, OH 45011
(513) 785-5810 (DAY)
(513) 785-5810 (24-HR)

CARROLL COUNTY LEPC**INFORMATION COORDINATOR**

Ralph Lloyd
Carroll Cnty. EMA Dir.
43 Second St. SE
Carrollton, OH 44615
(330) 627-0003

EMERGENCY COORDINATOR

Ralph Lloyd
Carroll Cnty. EMA Dir.
43 Second St. SE
Carrollton, OH 44615
(330) 627-0003 (DAY)
(330) 627-2141 (24-HR)

CHAMPAIGN COUNTY LEPC**INFORMATION COORDINATOR**

Jim McIntosh
Urbana Fire Chief
107 E. Market St.
Urbana, OH 43078
(937) 653-3509

EMERGENCY COORDINATOR

Jim McIntosh
Urbana Fire Chief
107 E. Market St.
Urbana, OH 43078
(937) 653-3509 (DAY)
(937) 652-2131 (24-HR)

CLARK COUNTY LEPC**INFORMATION COORDINATOR**

Robert Hupp
Clark Cnty. EMA Dir.
4075 Laybourne Rd.
Springfield, OH 45505
(937) 328-4586

EMERGENCY COORDINATOR

Keith Nawman
Clark Cnty. Haz. Mat. Coord.
350 N. Fountain Ave.
Springfield, OH 45504
(937) 324-7607 (DAY)
(937) 324-7615 (24-HR)

CLERMONT COUNTY LEPC**INFORMATION COORDINATOR**

Laurie Schlueter
Clermont Cnty. Info. Coord.
2279 Clermont Center Rd.
Batavia, OH 45103
(513) 732-7661

EMERGENCY COORDINATOR

Beth Nevel
Clermont Cnty. Emergency Coord.
2279 Clermont Center Rd.
Batavia, OH 45103
(513) 732-7661 (DAY)
(513) 732-2231 (24-HR)

CLINTON COUNTY LEPC**INFORMATION COORDINATOR**

Shawn Pandorf
Clinton Cnty. EMA
53 E. Main St.
Wilmington, OH 45177
(937) 382-6673

EMERGENCY COORDINATOR

Shawn Pandorf
Clinton Cnty. EMA
53 E. Main St.
Wilmington, OH 45177
(937) 382-6673 (DAY)
(937) 382-3543 (24-HR)

COLUMBIANA COUNTY LEPC**INFORMATION COORDINATOR**

Susan Bennett
Columbiana Cnty. Info. Coord.
8473 County Home Rd.
P. O. Box 404
Lisbon, OH 44432
(330) 424-0861

EMERGENCY COORDINATOR

Jay Carter
Columbiana Cnty. EMA Dir.
7301 Lisbon-Carfield Rd.
P. O. Box 414
Lisbon, OH 44432
(330) 424-9725 (DAY)
(330) 424-7255 (24-HR)

COSHOCTON COUNTY LEPC**INFORMATION COORDINATOR**

Jean Honabarger
Coshocton Cnty. EMA Dir.
724 S. 7th St.
Coshocton, OH 43812
(740) 622-1984

EMERGENCY COORDINATOR

Jean Honabarger
Coshocton Cnty. EMA Dir.
724 S. 7th St.
Coshocton, OH 43812
(740) 622-1984 (DAY)
(740) 622-2411 (24-HR)

CRAWFORD COUNTY LEPC**INFORMATION COORDINATOR**

Dave Weir
Crawford Cnty. LEPC
112 E. Mansfield St.
P. O. Box 1226
Bucyrus, OH 44820
(419) 468-8569

EMERGENCY COORDINATOR

Kristine Strauch
Crawford Cnty. EMA Dir.
112 E. Mansfield St.
P. O. Box 1226
Bucyrus, OH 44820
(419) 562-6009 (DAY)
(419) 562-7906 (24-HR)

CUYAHOGA COUNTY LEPC**INFORMATION COORDINATOR**

Michael Kalstrom
Cuyahoga Cnty. Info. Coord.
1255 Euclid Ave./Suite 102
Cleveland, OH 44115-1807
(216) 443-7597

EMERGENCY COORDINATOR

Murray A. Withrow
Cuyahoga Cnty. EMA
1255 Euclid Ave./Suite 102
Cleveland, OH 44115-1807
(216) 443-3196 (DAY)
(216) 771-1365 (24-HR)

DARKE COUNTY LEPC

INFORMATION COORDINATOR
June Thompson
Darke Cnty. EMA Dir.
5185 County Home Rd.
Greenville, OH 45331
(937) 548-1444

EMERGENCY COORDINATOR
June Thompson
Darke Cnty. EMA Dir.
5185 County Home Rd.
Greenville, OH 45331
(937) 548-1444 (DAY)
(937) 548-2020 (24 HR)

DEFIANCE COUNTY LEPC

INFORMATION COORDINATOR
Karrie Bergman
Defiance Cnty. LEPC
22491 Mill St.
Defiance, OH 43512
(419) 782-1130

EMERGENCY COORDINATOR
Mark Hopper
Defiance Cnty. Public Safety
22491 Mill St.
Defiance, OH 43512
(419) 782-1130 (DAY)
(419) 784-1155 (24-HR)

DELAWARE COUNTY LEPC

INFORMATION COORDINATOR
Larry Fisher
Delaware Cnty. EMA
10 Court St.
Delaware, OH 43015
(740) 833-2163

EMERGENCY COORDINATOR
David Hall
Delaware Cnty. EMA
10 Court St.
Delaware, OH 43015
(740) 833-2181 (DAY)
(740) 548-3911 (24 HR)

ERIE COUNTY LEPC

INFORMATION COORDINATOR
Marianne Cheetham
Erie Cnty. LEPC
2900 Columbus Ave.
Sandusky, OH 44870
(419) 627-7617

EMERGENCY COORDINATOR
Bill Walker
Erie Cnty. EMA Director
2900 Columbus Ave.
Sandusky, OH 44870
(419) 627-7617 (DAY)
(419) 627-7668 (24-HR)

FAIRFIELD COUNTY LEPC

INFORMATION COORDINATOR
Daniel Bolger, PE.
Fairfield Cnty. Info. Coord.
111 N. Broad St.
Lancaster, OH 43130
(740) 654-4357

EMERGENCY COORDINATOR
Daniel Bolger, P.E.
Fairfield Cnty. EMA Dir.
111 N. Broad St.
Lancaster, OH 43130
(740) 654-4357 (DAY)
(740) 653-5223 (24-HR)

FAYETTE COUNTY LEPC

INFORMATION COORDINATOR
Fulton Terry
Fayette Cnty. Info. Coord.
224 N. Main St.
Washington CH, OH 43160
(740) 335-8264

EMERGENCY COORDINATOR
Fulton Terry
Fayette Cnty. EMA Dir.
224 N. Main St.
Washington CH, OH 43160
(740) 335-8264 (DAY)
(740) 636-2360 (24-HR)

FRANKLIN COUNTY LEPC

INFORMATION COORDINATOR
Robert Lautzenheiser
Columbus Health Dept., Envir. Div.
181 Washington Blvd.
Columbus, OH 43215
(614) 645-6197

EMERGENCY COORDINATOR
J.R. Thomas
Franklin Cnty. EMA Dir.
756 Harmon Ave.
Columbus, OH 43223
(614) 469-9700 (DAY)
(614) 221-9600 (24-HR)

FULTON COUNTY LEPC

INFORMATION COORDINATOR
John L. Richards
Fulton Cnty. EMA Dir.
604 S. Shoop Ave., Suite 280
Wauseon, OH 43567
(419) 337-9207

EMERGENCY COORDINATOR
John L. Richards
Fulton Cnty. EMA Dir.
604 S. Shoop Ave., Suite 280
Wauseon, OH 43567
(419) 337-9207 (DAY)
(419) 335-6856 (24-HR)

GALLIA COUNTY LEPC

INFORMATION COORDINATOR
Mike Null
Gallia Cnty. EMA Dir.
18 Locust St./Rm. 1263
Gallipolis, OH 45631
(740) 441-2036

EMERGENCY COORDINATOR
Mike Null
Gallia Cnty. EMA Dir.
18 Locust St./Rm. 1263
Gallipolis, OH 45631
(740) 441-2036 (DAY)
(740) 446-1221 (24-HR)

GEAUGA COUNTY LEPC

INFORMATION COORDINATOR
Judy Oberstar
Geauga Cnty. LEPC
12518 Merritt Rd.
Chardon, OH 44024
(440) 285-9200

EMERGENCY COORDINATOR
Dale B. Wedge
Geauga Cnty. Emergency Services
12518 Merritt Rd.
Chardon, OH 44024
(440) 285-9200 (DAY)
(440) 286-1234 (24-HR)

GREENE/MONTGOMERY COUNTY LEPC

INFORMATION COORDINATOR
Ken LeBlanc
Mont./Greene Cnty. Info. Coord.
40 W. 4th St./Suite 400
Dayton, OH 45402
(937) 223-6323

EMERGENCY COORDINATOR
 Billy Ring
 Dayton Regional HazMat Coord.
 4200 Lake Center Dr.
 Trotwood, OH 45426
 (937) 854-4822 (DAY)
 (937) 225-4357 (24-HR)

GUERNSEY COUNTY LEPC

INFORMATION COORDINATOR
 Tom Beckner
 Guernsey Cnty. Info. Coord.
 1112 Wheeling Ave.
 Cambridge, OH 43725
 (740) 432-9293

EMERGENCY COORDINATOR
 Eral Shimp
 Guernsey Cnty. EMA
 1112 Wheeling Ave.
 Cambridge, OH 43725
 (740) 432-9292 (DAY)
 (740) 439-4455 (24-HR)

HAMILTON COUNTY LEPC

INFORMATION COORDINATOR
 Don Maccarone
 Hamilton Cnty. EMA Dir.
 2377 Civic Center Dr.
 Cincinnati, OH 45231
 (513) 851-7080

EMERGENCY COORDINATOR
 Don Maccarone
 Hamilton Cnty. EMA Dir.
 2377 Civic Center Dr.
 Cincinnati, OH 45231
 (513) 851-7080 (DAY)
 (513) 595-8518 (24-HR)

HANCOCK COUNTY LEPC

INFORMATION COORDINATOR
 William Day
 Hancock Cnty. Info. Coord.
 604 Lima Ave.
 Findlay, OH 45840
 (419) 424-7092

EMERGENCY COORDINATOR
 William Day
 Hancock Cnty. EMA Coord.
 604 Lima Ave.
 Findlay, OH 45840
 (419) 424-7092 (DAY)
 (419) 422-2424 (24-HR)

HARDIN COUNTY LEPC

INFORMATION COORDINATOR
 James Steele
 Hardin Cnty. EMA Dir.
 1 Courthouse Sq./Suite 20
 Kenton, OH 43326
 (419) 674-2276

EMERGENCY COORDINATOR
 James Steele
 Hardin Cnty. LEPC
 1 Courthouse Sq./Suite 20
 Kenton, OH 43326
 (419) 674-2276 (DAY)
 1-800-443-2394 (24-HR)

HARRISON COUNTY LEPC

INFORMATION COORDINATOR
 Lorna Bower
 Harrison Cnty. EMA Dir.
 628C E. Market St.
 Cadiz, OH 43907
 (740) 942-3922

EMERGENCY COORDINATOR
 Lorna Bower
 Harrison Cnty. EMA Dir.
 628C E. Market St.
 Cadiz, OH 43907
 (740) 942-3922 (DAY)
 (740) 942-2197 (24-HR)

HENRY COUNTY LEPC

INFORMATION COORDINATOR
 Laurie Sans
 Henry Cnty. LEPC
 660 N. Perry St./P. O. Box 546
 Napoleon, OH 43545
 (419) 599-5827

EMERGENCY COORDINATOR
 Tim Weaver
 Henry Cnty. EMA Dir.
 660 N. Perry St./P. O. Box 546
 Napoleon, OH 43545
 (419) 592-4876 (DAY)
 (419) 592-8010 (24-HR)

HIGHLAND COUNTY LEPC

INFORMATION COORDINATOR
 James A. Lyle
 Highland Cnty. EMA Dir.
 135 N. High St.
 Hillsboro, OH 45133
 (937) 393-5880

EMERGENCY COORDINATOR
 James A. Lyle
 Highland Cnty. EMA Dir.
 135 N. High St.
 Hillsboro, OH 45133
 (937) 393-5880 (Day)
 (937) 593-2902 (24-HR)

HOCKING COUNTY LEPC

INFORMATION COORDINATOR
 Barbara Bunthoff
 Hocking Cnty. EMA Dir.
 52 E. Second St.
 Logan, OH 43138
 (740) 385-6168

EMERGENCY COORDINATOR
 Barbara Bunthoff
 Hocking Cnty. EMA Dir.
 52 E. Second St.
 Logan, OH 43138
 (740) 385-6168 (DAY)
 (740) 385-1616 (24-HR)

HOLMES COUNTY LEPC

INFORMATION COORDINATOR
 Dennis Fitzpatric
 Holmes Cnty. EMA Dir.
 2 Court St., Suite 11
 Millersburg, OH 44654
 (330) 674-0989

EMERGENCY COORDINATOR
 Dennis Fitzpatric
 Holmes Cnty. EMA Dir.
 2 Court St., Suite 11
 Millersburg, OH 44654
 (330) 674-0989 (DAY)
 (330) 674-1936 (24-HR)

HURON COUNTY LEPC

INFORMATION COORDINATOR
 William Ommert
 Huron Cnty. EMA Dir.
 255-B Shady Lane Dr.
 Norwalk, OH 44857
 (419) 663-5772

EMERGENCY COORDINATOR
 William Ommert
 Huron Cnty. EMA Dir.
 255-B Shady Lane Dr.
 Norwalk, OH 44857
 (419) 663-5772 (DAY)
 (419) 663-5772 (24-HR)

JACKSON COUNTY LEPC**INFORMATION COORDINATOR**

Gary L. Radabaugh
Jackson Cnty. EMA Dir.
200 Main St. - Rm. 205
Jackson, OH 45640
(740) 286-5630

EMERGENCY COORDINATOR

Gary L. Radabaugh
Jackson Cnty. EMA Dir.
200 Main St. - Rm. 205
Jackson, OH 45640
(740) 286-5630 (DAY)
(740) 286-6464 (24-HR)

JEFFERSON COUNTY LEPC**INFORMATION COORDINATOR**

Bill Myers
Jefferson Cnty. EMA
423 North St.
Steubenville, OH 43952
(740) 282-1263

EMERGENCY COORDINATOR

Mary Petrozzi
Jefferson Cnty. EMA
423 North St.
Steubenville, OH 43952
(740) 283-8542 (DAY)
(740) 283-8600 (24-HR)

KNOX COUNTY LEPC**INFORMATION COORDINATOR**

Larry Hatton
Knox Cnty. EMA Dir.
117 E. High St.
Mt. Vernon, OH 43050
(740) 393-6772

EMERGENCY COORDINATOR

Larry Hatton
Knox Cnty. EMA Dir.
117 E. High St.
Mt. Vernon, OH 43050
(740) 393-6772 (DAY)
(740) 397-3333 (24-HR)

LAKE COUNTY LEPC**INFORMATION COORDINATOR**

Jo Ann Buckley
Lake Cnty. LEPC
8505 Garfield Rd./P. O. Box 480
Mentor, OH 44060
(440) 256-1415

Robert Archer
Lake Cnty. EMA Dir.
8505 Garfield Rd./P. O. Box 480
Mentor, OH 44060
(440) 256-1415 (DAY)
(440) 256-1415 (24-HR)

LAWRENCE COUNTY LEPC**INFORMATION COORDINATOR**

Margie Burcham
Lawrence Cnty. Info. Coord.
P. O. Box 233
Ironton, OH 45638
(740) 534-5803

EMERGENCY COORDINATOR

Margie Burcham
Lawrence Cnty. LEPC
P. O. Box 233
Ironton, OH 45638
(740) 534-5803 (DAY)
(740) 533-4375 (24-HR)

LICKING COUNTY LEPC**INFORMATION COORDINATOR**

Steve Smith
Licking Cnty. EMA
155 E. Main St.
Newark, OH 43055
(740) 349-6437

EMERGENCY COORDINATOR

Jeff Walker
Licking Cnty. EMA Dir.
155 E. Main St.
Newark, OH 43055
(740) 349-6437 (DAY)
(740) 345-2345 (24-HR)

LOGAN COUNTY LEPC**INFORMATION COORDINATOR**

Helen Norris
Logan Cnty. Info. Coord.
1855 St. Rt. 47 W.
Bellefontaine, OH 43311
(937) 593-5743

EMERGENCY COORDINATOR

Don Watkins
Logan Cnty. LEPC
1855 St. Rt. 47 W.
Bellefontaine, OH 43311
(937) 593-5743 (DAY)
(937) 599-8787 (24-HR)

LORAIN COUNTY LEPC**INFORMATION COORDINATOR**

Karen Lecorchick
Lorain Cnty. Info. Coord.
322 N. Gateway Blvd.
Elyria, OH 44035
(440) 329-5117

EMERGENCY COORDINATOR

Tom Kelley
Lorain Cnty. EMA
322 N. Gateway Blvd.
Elyria, OH 44035
(440) 329-5117 (DAY)
(440) 322-5888 (24-HR)

LUCAS COUNTY LEPC**INFORMATION COORDINATOR**

William Halsey
Lucas Cnty. EMA/LEPC
2144 Monroe St.
Toledo, OH 43624
(419) 213-6505

EMERGENCY COORDINATOR

John Gulch
Toledo Environmental Services
348 S. Erie St.
Toledo, OH 43602
(419) 936-3751 (DAY)
(419) 936-3550 (24-HR)

MADISON COUNTY LEPC**INFORMATION COORDINATOR**

Paul VanHorn
LEPC Chairman
103 E. High St.
London, OH 43140
(740) 852-4297

EMERGENCY COORDINATOR

Doug Crabbe
Madison Cnty. EMA
23 W. High St./P. O. Box 558
London, OH 43140
(740) 852-4200 (DAY)
(740) 852-1212 (24-HR)

MAHONING COUNTY LEPC**INFORMATION COORDINATOR**

Walter Duzzny
Mahoning Cnty. EMA
110 5th Ave.
Youngstown, OH 44503
(330) 740-2200

EMERGENCY COORDINATOR

Walter Duzzny
Mahoning Cnty. EMA Dir.
110 5th Ave.
Youngstown, OH 44503
(330) 740-2200 (DAY)
(330) 740-1949 (24-HR)

MARION COUNTY LEPC**INFORMATION COORDINATOR**

Donald J. Caprino
Marion Cnty. EMA Dir.
100 N. Main St.
Marion, OH 43302
(740) 494-4059

EMERGENCY COORDINATOR

Donald J. Caprino
Marion Cnty. EMA Dir.
100 N. Main St./Courthouse
Marion, OH 43302
(740) 494-4059 (DAY)
(740) 382-8244 (24-HR)

MEDINA COUNTY LEPC**INFORMATION COORDINATOR**

Allen Rickenbrode
Medina Cnty. LEPC
555 Independence Drive
Medina, OH 44256
(330) 722-9240

EMERGENCY COORDINATOR

Charles Adams
Medina Cnty. EMA
555 Independence Drive
Medina, OH 44256
(330) 722-9240 (DAY)
(330) 725-6631 (24-HR)

MEIGS COUNTY LEPC**INFORMATION COORDINATOR**

Robert Byers
Meigs Cnty. EMA Dir.
117 E. Memorial Drive
Pomeroy, OH 45769
(740) 992-4541

EMERGENCY COORDINATOR

Robert Byers
Meigs Cnty. EMA Director
117 E. Memorial Drive
Pomeroy, OH 45769
(740) 992-4541 (DAY)
(740) 992-6617 (24-HR)

MERCER COUNTY LEPC**INFORMATION COORDINATOR**

Karl H. Kaiser
Mercer Cnty. EMA Dir.
214 W. Livingston St.
Celina, OH 45822
(419) 586-6468

EMERGENCY COORDINATOR

Karl H. Kaiser
Mercer Cnty. EMA Dir.
214 W. Livingston St.
Celina, OH 45822
(419) 586-6468 (DAY)
(419) 586-6455 (24-HR)

MIAMI COUNTY LEPC**INFORMATION COORDINATOR**

Richard Sword
Miami Cnty. EMA Dir.
210 Marybill Dr.
Troy, OH 45373
(937) 339-6400 Ext. 230

EMERGENCY COORDINATOR

Steve Pfister
Miami Cnty. LEPC
4801 Springfield St.
Dayton, OH 45431
(937) 476-0306 (DAY)
(937) 339-6400 (24-HR)

MONROE COUNTY LEPC**INFORMATION COORDINATOR**

Robyn Guiler
Monroe Cnty. Info. Coord.
P. O. Box 584
Woodsfield, OH 43793-0584
(740) 472-0220

EMERGENCY COORDINATOR

Rick Schuerman
Monroe Cnty. EMA
216 Oaklawn Ave.
Woodsfield, OH 43793
(740) 472-2144 (DAY)
(740) 472-1612 (24-HR)

**MONTGOMERY/GREENE
COUNTY LEPC****INFORMATION COORDINATOR**

Ken LeBlanc
Mont./Greene Cnty. Info. Coord.
40 W. 4th St./Suite 400
Dayton, OH 45402
(937) 223-6323

EMERGENCY COORDINATOR

Billy Ring
Dayton Regional HazMat Coord.
4200 Lake Center Dr.
Trotwood, OH 45426
(937) 854-4822 (DAY)
(937) 225-4357 (24-HR)

MORGAN COUNTY LEPC**INFORMATION COORDINATOR**

Terry Robinson
Morgan Cnty. EMA Director
37 E. Main St. - Basement
McConnelsville, OH 43756
(740) 962-2424

EMERGENCY COORDINATOR

Terry Robinson
Morgan Cnty. EMA Director
37 E. Main St. - Basement
McConnelsville, OH 43756
(740) 962-2424 (DAY)
(740) 962-2663 (24-HR)

MORROW COUNTY LEPC**INFORMATION COORDINATOR**

Joseph A. Edwards
Morrow Cnty. EMA Director
47 E. Center St.
Mt. Gilead, OH 43338
(419) 947-4041

EMERGENCY COORDINATOR

Joseph A. Edwards
Morrow Cnty. LEPC
47 E. Center St.
Mt. Gilead, OH 43338
(419) 947-4041 (DAY)
(419) 946-7055 (24-HR)

MUSKINGUM COUNTY LEPC**INFORMATION COORDINATOR**

Kathy Hanning
Muskingum Cnty. Info. Coord.
3530 Mona Drive
Zanesville, OH 43701
(740) 454-0044

EMERGENCY COORDINATOR

Judith Hatfield
Muskingum Cnty. EMA Dir.
401 Main St.-Courthouse
Zanesville, OH 43701
(740) 453-1655 (DAY)
(740) 452-3637 (24-HR)

NOBLE COUNTY LEPC

INFORMATION COORDINATOR
Lois White
Noble Cnty. LEPC
48535 County Rd. 14A
Caldwell, OH 43724
(740) 732-7387

EMERGENCY COORDINATOR
Chasity Hannum
Noble Cnty. EMA
48535 County Rd. 14A
Caldwell, OH 43724
(740) 732-7387 (DAY)
(740) 732-6022 (24-HR)

OTTAWA COUNTY LEPC

INFORMATION COORDINATOR
Fred Petersen
Safety Coordinator
315 Madison St.
Port Clinton, OH 43452
(419) 734-6904

EMERGENCY COORDINATOR
Jim Greer
Ottawa Cnty. EMA Dir.
315 Madison St.
Port Clinton, OH 43452
(419) 734-6900 (DAY)
(419) 734-4404 (24-HR)

PAULDING COUNTY LEPC

INFORMATION COORDINATOR
Randy Shaffer
Paulding Cnty. EMA Dir.
14043 CR 111
Paulding, OH 45879
(419) 399-3500

EMERGENCY COORDINATOR
Randy Shaffer
Paulding Cnty. EMA Dir.
14043 CR 111
Paulding, OH 45879
(419) 399-3500 (DAY)
(419) 399-3791 (24-HR)

PERRY COUNTY LEPC

INFORMATION COORDINATOR
Rita Spicer
Perry Cnty. LEPC
207 Ewing St./P.O. Box 252
New Straitsville, OH 43766
(740) 342-1141

EMERGENCY COORDINATOR
Joe Agriesti
Perry Cnty. EMA Dir.
1870 Airport Rd.
New Lexington, OH 43764
(740) 342-1141 (DAY)
(740) 342-4123 (24-HR)

PICKAWAY COUNTY LEPC

INFORMATION COORDINATOR
Kevin Driesbach
Pickaway Cnty. EMA
139 W. Franklin St. (Rear)
Circleville, OH 43113
(740) 477-1165

EMERGENCY COORDINATOR
Kevin Driesbach
Pickaway Cnty. EMA
139 W. Franklin St. (Rear)
Circleville, OH 43113
(740) 477-1165 (DAY)
(740) 477-1165 (24-HR)

PIKE COUNTY LEPC

INFORMATION COORDINATOR
Sharon Keiser
Pike Cnty. Sheriff Office
108 E. 2nd St.
Waverly, OH 45690
(740) 947-2111

EMERGENCY COORDINATOR
Larry Travis
Pike Cnty. Sheriff
108 E. 2nd St.
Waverly, OH 45690
(740) 947-2111 (DAY)
(740) 947-2111 (24-HR)

PORTAGE COUNTY LEPC

INFORMATION COORDINATOR
Shirley Walker
Portage Cnty. Info. Coord.
8240 Infirmary Rd.
Ravenna, OH 44266
(330) 297-7259

EMERGENCY COORDINATOR
Mark Griffiths
Portage Cnty. EMA
8240 Infirmary Rd.
Ravenna, OH 44266
(330) 297-3607 (DAY)
(330) 297-0222 (24-HR)

PREBLE COUNTY LEPC

INFORMATION COORDINATOR
Ilene Walker
Preble Cnty. Info. Coord.
101 E. Main St.
Eaton, OH 45320
(937) 456-8121

EMERGENCY COORDINATOR
Donita Donaldson
Preble Cnty. Emer. Coord.
101 E. Main St.
Eaton, OH 45320
(937) 456-8121 (DAY)
(937) 456-6262 (24-HR)

PUTNAM COUNTY LEPC

INFORMATION COORDINATOR
W.D. Miller
Putnam Cnty. Info. Coord.
1402 E. Main St./P. O. Box 370
Ottawa, OH 45875
(419) 523-3152

EMERGENCY COORDINATOR
Steven Odenweller
Putnam Cnty. EMA
1402 E. Main St./P. O. Box 370
Ottawa, OH 45875
(419) 523-3152 (DAY)
(419) 523-3208 (24-HR)

RICHLAND COUNTY LEPC

INFORMATION COORDINATOR
Ray Askins
Richland Cnty. EMA Dir.
38 S. Park St.
Mansfield, OH 44902
(419) 774-5886

EMERGENCY COORDINATOR
Ray Askins
Richland Cnty. EMA Dir.
38 S. Park St.
Mansfield, OH 44902
(419) 774-5886 (DAY)
(419) 774-5686 (24-HR)

ROSS COUNTY LEPC

INFORMATION COORDINATOR
Michael Lafreniere
Ross Cnty. LEPC
571 W. 5th St. (Ohio University)
Chillicothe, OH 45601
(740) 774-7278

EMERGENCY COORDINATOR

George Vandermark
Ross Cnty. EMA Dir.
P. O. Box 87
Armory Bldg. City Park
Alexander Circle
Chillicothe, OH 45601
(740) 773-1700 (DAY)
(740) 626-7097 (24-HR)

SANDUSKY COUNTY LEPC**INFORMATION COORDINATOR**

Bea Parish
Sandusky Cnty. EMA Dir.
100 N. Park Ave.
Fremont, OH 43420
(419) 334-8933

EMERGENCY COORDINATOR

Bea Parish
Sandusky Cnty. EMA Dir.
100 N. Park Ave.
Fremont, OH 43420
(419) 334-8933 (DAY)
(419) 332-2613 (24-HR)

SCIOTO COUNTY LEPC**INFORMATION COORDINATOR**

Kimberly Carver
Scioto Cnty. EMA Dir.
2010 Charles St.
Portsmouth, OH 45662
(740) 355-8300

EMERGENCY COORDINATOR

Kimberly Carver
Scioto Cnty. EMA Dir.
2010 Charles St.
Portsmouth, OH 45662
(740) 355-8300 (DAY)
(740) 354-7566 (24-HR)

SENECA COUNTY LEPC**INFORMATION COORDINATOR**

David Gross
Seneca Cnty. EMA Dir.
126 Hopewell Ave.
Tiffin, OH 44883
(419) 447-0266

EMERGENCY COORDINATOR

Dan Stahl
Seneca Cnty. EMA
126 Hopewell Ave.
Tiffin, OH 44883
(419) 447-0266 (DAY)
(419) 447-3456 (24-HR)

SHELBY COUNTY LEPC**INFORMATION COORDINATOR**

Tom Cisco
Shelby Cnty. EMA
800 Fair Rd.
Sidney, OH 45365
(937) 492-5635

EMERGENCY COORDINATOR

Michael Martz
Shelby Cnty. EMA Dir.
800 Fair Rd.
Sidney, OH 45365
(937) 492-5635 (DAY)
(937) 498-1111 (24-HR)

STARK COUNTY LEPC**INFORMATION COORDINATOR**

Edward Cox
Stark Cnty. EMA Dir.
4500 Atlantic Blvd., NE
Canton, OH 44705-4374
(330) 430-3693

EMERGENCY COORDINATOR

Edward Cox
Stark Cnty. LEPC
4500 Atlantic Blvd., NE
Canton, OH 44705-4374
(330) 430-3693 (DAY)
(330) 430-3693 (24-HR)

SUMMIT COUNTY LEPC**INFORMATION COORDINATOR**

Annette Petranic
Summit Cnty. Info. Coord.
191 S. Main St.
Akron, OH 44308
(330) 643-2558

EMERGENCY COORDINATOR

Annette Petranic
Summit Cnty. LEPC
191 S. Main St.
Akron, OH 44308
(330) 643-2558 (DAY)
(330) 643-2522 (24-HR)

TRUMBULL COUNTY LEPC**INFORMATION COORDINATOR**

Linda Beil
Trumbull Cnty. EMA
176 Chestnut Ave. NE.
Warren, OH 44483
(330) 675-2666

EMERGENCY COORDINATOR

Linda Beil
Trumbull Cnty. EMA
176 Chestnut Ave. NE.
Warren, OH 44483
(330) 675-2666 (DAY)
(330) 675-2666 (24-HR)

TUSCARAWAS COUNTY LEPC**INFORMATION COORDINATOR**

Patty Levensgood
Tuscarawas Cnty. EMA Dir.
10132 St. Rt. 36 SW/P. O. Box 9
Port Washington, OH 43837
(800) 511-3010

EMERGENCY COORDINATOR

Patty Levensgood
Tuscarawas Cnty. EMA Dir.
10132 St. Rt. 36 SW/P. O. Box 9
Port Washington, OH 43837
(800) 511-3010 (DAY)
(330) 343-2642 (24-HR)

UNION COUNTY LEPC**INFORMATION COORDINATOR**

Randy Riffle
Union Cnty. LEPC
233 W. 6th St.
Marysville, OH 43040
(937) 645-3175

EMERGENCY COORDINATOR

John Overly
Union Cnty. Sheriff
221 W. 5th St.
Marysville, OH 43040
(937) 644-5010 (DAY)
(937) 644-5010 (24-HR)

VAN WERT COUNTY LEPC**INFORMATION COORDINATOR**

Rick McCoy
Van Wert Cnty. EMA Dir.
1220 Lincoln Highway/P. O. Box 602
Van Wert, OH 45891
(419) 238-1300

EMERGENCY COORDINATOR

Rick McCoy
Van Wert Cnty. EMA Dir.
1220 Lincoln Highway/P. O. Box 602
Van Wert, OH 45891
(419) 238-1300 (DAY)
(419) 238-2462 (24-HR)

VINTON COUNTY LEPC**INFORMATION COORDINATOR**

David Pollinger
Vinton Cnty. Info. Coord.
106 S. Market St.
McArthur, OH 45651
(740) 596-3524

EMERGENCY COORDINATOR

David Pollinger
Vinton Cnty. EMA
106 S. Market St.
McArthur, OH 45651
(740) 596-3524 (DAY)
(740) 352-2748 (24-HR)

WARREN COUNTY LEPC**INFORMATION COORDINATOR**

Frank Young
Warren Cnty. EMA
500 Justice Dr.
Lebanon, OH 45036
(513) 695-1315

EMERGENCY COORDINATOR

Paul Deane
Warren Cnty. LEPC
500 Justice Dr.
Lebanon, OH 45036
(513) 933-1315 (DAY)
(513) 932-4080 (24-HR)

WASHINGTON COUNTY LEPC**INFORMATION COORDINATOR**

Dennis Cavilier
Washington Cnty. EMA Dir.
205 Putnam St.
Marietta, OH 45750
(740) 373-5613

EMERGENCY COORDINATOR

Dennis Cavilier
Washington Cnty. EMA
205 Putnam St.
Marietta, OH 45750
(740) 373-5613 (DAY)
(740) 373-2833 (24-HR)

WAYNE COUNTY LEPC**INFORMATION COORDINATOR**

John Wise
Wayne Cnty. EMA Dir.
201 W. North St.
Wooster, OH 44691
(330) 262-9817

EMERGENCY COORDINATOR

John Wise
Wayne Cnty. EMA
201 W. North St.
Wooster, OH 44691
(330) 262-9817 (DAY)
(330) 287-5700 (24-HR)

WILLIAMS COUNTY LEPC**INFORMATION COORDINATOR**

Bruce Siders
Williams Cnty. LEPC
304 W. High St.
Bryan, OH 43506
(419) 636-4232

EMERGENCY COORDINATOR

Bruce Siders
Williams Cnty. LEPC
304 W. High St.
Bryan, OH 43506
(419) 636-4232 (DAY)
(419) 636-1151 (24-HR)

WOOD COUNTY LEPC**INFORMATION COORDINATOR**

Lisa Kern
Wood County EMA
One Courthouse Square
Bowling Green, OH 43402
(419) 354-9269

EMERGENCY COORDINATOR

Jonathan E. Larson
Wood Cnty. EMA Dir.
One Courthouse Square
Bowling Green, OH 43402
(419) 354-9269 (DAY)
(800) 516-0448 (24-HR)

WYANDOT COUNTY LEPC**INFORMATION COORDINATOR**

Cyrus W. Dille
Wyandot Cnty. EMA Dir.
125 E. Wyandot Ave.
Upper Sandusky, OH 43351
(419) 294-6406

EMERGENCY COORDINATOR

Michael R. Hetzel
Wyandot Cnty. Sheriff
125 E. Wyandot Ave.
Upper Sandusky, OH 43351
(419) 294-2362 (DAY)
(419) 294-2362 (24-HR)

Revised October 2000

PART B – ADDITIONAL LOCATION INFORMATION	
<p>*1. Was the origin of the Accident onshore? <input type="radio"/> Yes (Complete Questions 2-12) <input type="radio"/> No (Complete Questions 13-15)</p>	
<p>If Onshore:</p> <p>*2. State: / / /</p> <p>*3. Zip Code: / / / - / / / / /</p> <p>4. _____ 5. _____ City County or Parish</p> <p>6. Operator-designated location: (select only one) <input type="checkbox"/> Milepost/Valve Station (specify in shaded area below) <input type="checkbox"/> Survey Station No. (specify in shaded area below) / / / / / / / / / / / / / / / /</p> <p>7. Pipeline/Facility name:</p> <p>8. Segment name/ID:</p> <p>*9. Was Accident on Federal land, other than the Outer Continental Shelf (OCS)? <input type="radio"/> Yes <input type="radio"/> No</p> <p>*10. Location of Accident: (select only one) <input type="checkbox"/> Totally contained on Operator-controlled property <input type="checkbox"/> Originated on Operator-controlled property, but then flowed or migrated off the property <input type="checkbox"/> Pipeline right-of-way</p> <p>*11. Area of Accident (as found): (select only one) <input type="checkbox"/> Tank, including attached appurtenances <input type="checkbox"/> Underground ⇨ Specify: <input type="radio"/> Under soil <input type="radio"/> Under a building <input type="radio"/> Under pavement <input type="radio"/> Exposed due to excavation <input type="radio"/> In underground enclosed space (e.g., vault) <input type="radio"/> Other _____ Depth-of-Cover (in): / / / / / / / / / / <input type="checkbox"/> Aboveground ⇨ Specify: <input type="radio"/> Typical aboveground facility piping or appurtenance <input type="radio"/> Overhead crossing <input type="radio"/> In or spanning an open ditch <input type="radio"/> Inside a building <input type="radio"/> Inside other enclosed space <input type="radio"/> Other _____ <input type="checkbox"/> Transition Area ⇨ Specify: <input type="radio"/> Soil/air interface <input type="radio"/> Wall sleeve <input type="radio"/> Pipe support or other close contact area <input type="radio"/> Other _____</p> <p>*12. Did Accident occur in a crossing?: <input type="radio"/> Yes <input type="radio"/> No If Yes, specify type below: <input type="checkbox"/> Bridge crossing ⇨ Specify: <input type="radio"/> Cased <input type="radio"/> Uncased <input type="checkbox"/> Railroad crossing ⇨ (select all that apply) <input type="radio"/> Cased <input type="radio"/> Uncased <input type="radio"/> Bored/drilled <input type="checkbox"/> Road crossing ⇨ (select all that apply) <input type="radio"/> Cased <input type="radio"/> Uncased <input type="radio"/> Bored/drilled <input type="checkbox"/> Water crossing ⇨ Specify: <input type="radio"/> Cased <input type="radio"/> Uncased Name of body of water, if commonly known: _____ Approx. water depth (ft) at the point of the Accident: / / / / / / / / / / (select only one of the following) <input type="radio"/> Shoreline/Bank crossing <input type="radio"/> Below water, pipe in bored/drilled crossing <input type="radio"/> Below water, pipe buried below bottom (NOT in bored/drilled crossing) <input type="radio"/> Below water, pipe on or above bottom</p>	<p>If Offshore:</p> <p>*13. Approximate water depth (ft.) at the point of the Accident: / / / / / / / / / /</p> <p>*14. Origin of Accident: <input type="checkbox"/> In State waters ⇨ Specify: State: / / / / / Area: _____ Block/Tract #: / / / / / / / / / / Nearest County/Parish: _____</p> <p><input type="checkbox"/> On the Outer Continental Shelf (OCS) ⇨ Specify: Area: _____ Block #: / / / / / / / / / /</p> <p>*15. Area of Accident: (select only one) <input type="checkbox"/> Shoreline/Bank crossing or shore approach <input type="checkbox"/> Below water, pipe buried or jetted below seabed <input type="checkbox"/> Below water, pipe on or above seabed <input type="checkbox"/> Splash Zone of riser <input type="checkbox"/> Portion of riser outside of Splash Zone, including riser bend <input type="checkbox"/> Platform</p>

PART E – ADDITIONAL OPERATING INFORMATION	
*1. Estimated pressure at the point and time of the Accident (psig):	____/____/____/____/____/____
*2. Maximum Operating Pressure (MOP) at the point and time of the Accident (psig) :	____/____/____/____/____/____
*3. Describe the pressure on the system or facility relating to the Accident: <i>(select only one)</i>	
<input type="checkbox"/> Pressure did not exceed MOP	
<input type="checkbox"/> Pressure exceeded MOP, but did not exceed 110% of MOP	
<input type="checkbox"/> Pressure exceeded 110% of MOP	
*4. Not including pressure reductions required by PHMSA regulations (such as for repairs and pipe movement), was the system or facility relating to the Accident operating under an established pressure restriction with pressure limits below those normally allowed by the MOP?	
<input type="checkbox"/> No	
<input type="checkbox"/> Yes ⇨ <i>(Complete 4.a and 4.b below)</i>	
*4.a Did the pressure exceed this established pressure restriction?	<input type="radio"/> Yes <input type="radio"/> No
*4.b Was this pressure restriction mandated by PHMSA or the State?	<input type="radio"/> PHMSA <input type="radio"/> State <input type="radio"/> Not mandated
*5. Was "Onshore Pipeline, Including Valve Sites" OR "Offshore Pipeline, Including Riser and Riser Bend" selected in PART C, Question 2?	
<input type="checkbox"/> No	
<input type="checkbox"/> Yes ⇨ <i>(Complete 5.a – 5.f below)</i>	
5.a Type of upstream valve used to initially isolate release source:	<input type="radio"/> Manual <input type="radio"/> Automatic <input type="radio"/> Remotely Controlled
5.b Type of downstream valve used to initially isolate release source:	<input type="radio"/> Manual <input type="radio"/> Automatic <input type="radio"/> Remotely Controlled <input type="radio"/> Check Valve
5.c Length of segment initially isolated between valves (ft):	____/____/____/____/____/____
5.d Is the pipeline configured to accommodate internal inspection tools?	
<input type="checkbox"/> Yes	
<input type="checkbox"/> No ⇨ Which physical features limit tool accommodation? <i>(select all that apply)</i>	
<input type="radio"/> Changes in line pipe diameter	
<input type="radio"/> Presence of unsuitable mainline valves	
<input type="radio"/> Tight or mitered pipe bends	
<input type="radio"/> Other passage restrictions (i.e. unbarred tee's, projecting instrumentation, etc.)	
<input type="radio"/> Extra thick pipe wall (applicable only for magnetic flux leakage internal inspection tools)	
<input type="radio"/> Other ⇨ Describe: _____	
5.e For this pipeline, are there operational factors which significantly complicate the execution of an internal inspection tool run?	
<input type="checkbox"/> No	
<input type="checkbox"/> Yes ⇨ Which operational factors complicate execution? <i>(select all that apply)</i>	
<input type="radio"/> Excessive debris or scale, wax, or other wall build-up	
<input type="radio"/> Low operating pressure(s)	
<input type="radio"/> Low flow or absence of flow	
<input type="radio"/> Incompatible commodity	
<input type="radio"/> Other ⇨ Describe: _____	
5.f Function of pipeline system: <i>(select only one)</i>	
<input type="checkbox"/> > 20% SMYS Regulated Trunkline/Transmission	<input type="checkbox"/> > 20% SMYS Regulated Gathering
<input type="checkbox"/> ≤ 20% SMYS Regulated Trunkline/Transmission	<input type="checkbox"/> ≤ 20% SMYS Regulated Gathering
<input type="checkbox"/> ≤ 20% SMYS "Unregulated" Trunkline/Transmission	<input type="checkbox"/> ≤ 20% SMYS "Unregulated" Gathering

*6. Was a Supervisory Control and Data Acquisition (SCADA)-based system in place on the pipeline or facility involved in the Accident?

- No
- Yes ⇒
 - 6.a Was it operating at the time of the Accident? Yes No
 - 6.b Was it fully functional at the time of the Accident? Yes No
 - 6.c Did SCADA-based information (such as alarm(s), alert(s), event(s), and/or volume calculations) assist with the detection of the Accident? Yes No
 - 6.d Did SCADA-based information (such as alarm(s), alert(s), event(s), and/or volume calculations) assist with the confirmation of the Accident? Yes No

*7. Was a CPM leak detection system in place on the pipeline or facility involved in the Accident?

- No
- Yes ⇒
 - 7.a Was it operating at the time of the Accident? Yes No
 - 7.b Was it fully functional at the time of the Accident? Yes No
 - 7.c Did CPM leak detection system information (such as alarm(s), alert(s), event(s), and/or volume calculations) assist with the detection of the Accident? Yes No
 - 7.d Did CPM leak detection system information (such as alarm(s), alert(s), event(s), and/or volume calculations) assist with the confirmation of the Accident? Yes No

*8. How was the Accident initially identified for the Operator? (select only one)

- CPM leak detection system or SCADA-based information (such as alarm(s), alert(s), event(s), and/or volume calculations)
- Static Shut-in Test or Other Pressure or Leak Test
- Controller Local Operating Personnel, including contractors
- Air Patrol Ground Patrol by Operator or its contractor
- Notification from Public Notification from Emergency Responder
- Notification from Third Party that caused the Accident Other _____

*8.a If "Controller", "Local Operating Personnel, including contractors", "Air Patrol", or "Ground Patrol by Operator or its contractor" is selected in Question 8, specify the following: (select only one)

- Operator employee
- Contractor working for the Operator

*9. Was an investigation initiated into whether or not the controller(s) or control room issues were the cause of or a contributing factor to the Accident? (select only one)

- Yes, but the investigation of the control room and/or controller actions has not yet been completed by the Operator (Supplemental Report required)
- No, the facility was not monitored by a controller(s) at the time of the Accident
- No, the Operator did not find that an investigation of the controller(s) actions or control room issues was necessary due to: (provide an explanation for why the Operator did not investigate)

Yes, specify investigation result(s): (select all that apply)

- Investigation reviewed work schedule rotations, continuous hours of service (while working for the Operator) and other factors associated with fatigue
- Investigation did NOT review work schedule rotations, continuous hours of service (while working for the Operator) and other factors associated with fatigue (provide an explanation for why not)

- Investigation identified no control room issues
- Investigation identified no controller issues
- Investigation identified incorrect controller action or controller error
- Investigation identified that fatigue may have affected the controller(s) involved or impacted the involved controller(s) response
- Investigation identified incorrect procedures
- Investigation identified incorrect control room equipment operation
- Investigation identified maintenance activities that affected control room operations, procedures, and/or controller response
- Investigation identified areas other than those above ⇒ Descr be: _____

PART F – DRUG & ALCOHOL TESTING INFORMATION

*1. As a result of this Accident, were any Operator employees tested under the post-accident drug and alcohol testing requirements of DOT's Drug & Alcohol Testing regulations?

No

Yes ⇨ *1.a Specify how many were tested: / / /

*1.b Specify how many failed: / / /

*2. As a result of this Accident, were any Operator contractor employees tested under the post-accident drug and alcohol testing requirements of DOT's Drug & Alcohol Testing regulations?

No

Yes ⇨ *2.a Specify how many were tested: / / /

*2.b Specify how many failed: / / /

Complete the following if any Corrosion Failure sub-cause is selected AND the "Item Involved in Accident" (from PART C, Question 3) is Pipe or Weld.

15. Has one or more internal inspection tool collected data at the point of the Accident?
 Yes No
- 15.a. If Yes, for each tool used, select type of internal inspection tool and indicate most recent year run:
- Magnetic Flux Leakage Tool / / / / /
 - Ultrasonic / / / / /
 - Geometry / / / / /
 - Caliper / / / / /
 - Crack / / / / /
 - Hard Spot / / / / /
 - Combination Tool / / / / /
 - Transverse Field/Triaxial / / / / /
 - Other _____ / / / / /
16. Has one or more hydrotest or other pressure test been conducted since original construction at the point of the Accident?
 Yes ⇨ Most recent year tested: / / / / / Test pressure (psig): / / / / /
 No
17. Has one or more Direct Assessment been conducted on this segment?
 Yes, and an investigative dig was conducted at the point of the Accident ⇨ Most recent year conducted: / / / / /
 Yes, but the point of the Accident was not identified as a dig site ⇨ Most recent year conducted: / / / / /
 No
18. Has one or more non-destructive examination been conducted at the point of the Accident since January 1, 2002?
 Yes No
- 18.a. If Yes, for each examination conducted since January 1, 2002, select type of non-destructive examination and indicate most recent year the examination was conducted:
- Radiography / / / / /
 - Guided Wave Ultrasonic / / / / /
 - Handheld Ultrasonic Tool / / / / /
 - Wet Magnetic Particle Test / / / / /
 - Dry Magnetic Particle Test / / / / /
 - Other _____ / / / / /

G2 - Natural Force Damage - *only one sub-cause can be picked from shaded left-hand column

<input type="checkbox"/> Earth Movement, NOT due to Heavy Rains/Floods	1. Specify: <input type="radio"/> Earthquake <input type="radio"/> Subsidence <input type="radio"/> Landslide <input type="radio"/> Other _____
<input type="checkbox"/> Heavy Rains/Floods	2. Specify: <input type="radio"/> Washout/Scouring <input type="radio"/> Flotation <input type="radio"/> Mudslide <input type="radio"/> Other _____
<input type="checkbox"/> Lightning	3. Specify: <input type="radio"/> Direct hit <input type="radio"/> Secondary impact such as resulting nearby fires
<input type="checkbox"/> Temperature	4. Specify: <input type="radio"/> Thermal Stress <input type="radio"/> Frost Heave <input type="radio"/> Frozen Components <input type="radio"/> Other _____
<input type="checkbox"/> High Winds	
<input type="checkbox"/> Other Natural Force Damage	*5. Describe: _____

Complete the following if any Natural Force Damage sub-cause is selected.

- *6. Were the natural forces causing the Accident generated in conjunction with an extreme weather event? Yes No
- *6.a. If Yes, specify: (select all that apply) Hurricane Tropical Storm Tornado
 Other _____

*17. Description of the CGA-DIRT Root Cause (*select only the one predominant first level CGA-DIRT Root Cause and then, where available as a choice, the one predominant second level CGA-DIRT Root Cause as well*):

One-Call Notification Practices Not Sufficient: (*select only one*)

- No notification made to the One-Call Center
- Notification to One-Call Center made, but not sufficient
- Wrong information provided

Locating Practices Not Sufficient: (*select only one*)

- Facility could not be found/located
- Facility marking or location not sufficient
- Facility was not located or marked
- Incorrect facility records/maps

Excavation Practices Not Sufficient: (*select only one*)

- Excavation practices not sufficient (other)
- Failure to maintain clearance
- Failure to maintain the marks
- Failure to support exposed facilities
- Failure to use hand tools where required
- Failure to verify location by test-hole (pot-holing)
- Improper backfilling

One-Call Notification Center Error

Abandoned Facility

Deteriorated Facility

Previous Damage

Data Not Collected

Other / None of the Above (*explain*) _____

	<p>7. Has one or more non-destructive examination been conducted at the point of the Accident since January 1, 2002? <input type="radio"/> Yes <input type="radio"/> No</p> <p>7.a If Yes, for each examination conducted since January 1, 2002, select type of non-destructive examination and indicate most recent year the examination was conducted:</p> <p><input type="radio"/> Radiography / / / / /</p> <p><input type="radio"/> Guided Wave Ultrasonic / / / / /</p> <p><input type="radio"/> Handheld Ultrasonic Tool / / / / /</p> <p><input type="radio"/> Wet Magnetic Particle Test / / / / /</p> <p><input type="radio"/> Dry Magnetic Particle Test / / / / /</p> <p><input type="radio"/> Other _____ / / / / /</p>
<p><input type="checkbox"/> Intentional Damage</p>	<p>8. Specify:</p> <p><input type="radio"/> Vandalism <input type="radio"/> Terrorism</p> <p><input type="radio"/> Theft of transported commodity <input type="radio"/> Theft of equipment</p> <p><input type="radio"/> Other _____</p>
<p><input type="checkbox"/> Other Outside Force Damage</p>	<p>*9. Descr be: _____</p>

G6 - Equipment Failure - *only one sub-cause can be picked from shaded left-hand column	
<input type="checkbox"/> Malfunction of Control/Relief Equipment	1. Specify: <i>(select all that apply)</i> <input type="radio"/> Control Valve <input type="radio"/> Instrumentation <input type="radio"/> SCADA <input type="radio"/> Communications <input type="radio"/> Block Valve <input type="radio"/> Check Valve <input type="radio"/> Relief Valve <input type="radio"/> Power Failure <input type="radio"/> Stopple/Control Fitting <input type="radio"/> ESD System Failure <input type="radio"/> Other _____
<input type="checkbox"/> Pump or Pump-related Equipment	2. Specify: <input type="radio"/> Seal/Packing Failure <input type="radio"/> Body Failure <input type="radio"/> Crack in Body <input type="radio"/> Appurtenance Failure <input type="radio"/> Other _____
<input type="checkbox"/> Threaded Connection/Coupling Failure	3. Specify: <input type="radio"/> Pipe Nipple <input type="radio"/> Valve Threads <input type="radio"/> Mechanical Coupling <input type="radio"/> Threaded Pipe Collar <input type="radio"/> Threaded Fitting <input type="radio"/> Other _____
<input type="checkbox"/> Non-threaded Connection Failure	4. Specify: <input type="radio"/> O-Ring <input type="radio"/> Gasket <input type="radio"/> Seal (NOT pump seal) or Packing <input type="radio"/> Other _____
<input type="checkbox"/> Defective or Loose Tubing or Fitting	
<input type="checkbox"/> Failure of Equipment Body (except Pump), Tank Plate, or other Material	
<input type="checkbox"/> Other Equipment Failure	*5. Describe: _____ _____
Complete the following if any Equipment Failure sub-cause is selected.	
*6. Additional factors that contributed to the equipment failure: <i>(select all that apply)</i>	
<input type="radio"/> Excessive v bration <input type="radio"/> Overpressurization <input type="radio"/> No support or loss of support <input type="radio"/> Manufacturing defect <input type="radio"/> Loss of electricity <input type="radio"/> Improper installation <input type="radio"/> Mismatched items (different manufacturer for tubing and tubing fittings) <input type="radio"/> Dissimilar metals <input type="radio"/> Breakdown of soft goods due to compatibility issues with transported commodity <input type="radio"/> Valve vault or valve can contributed to the release <input type="radio"/> Alarm/status failure <input type="radio"/> Misalignment <input type="radio"/> Thermal stress <input type="radio"/> Other _____	

G7 - Incorrect Operation - *only one sub-cause can be picked from shaded left-hand column	
<input type="checkbox"/> Damage by Operator or Operator's Contractor NOT Related to Excavation and NOT due to Motorized Vehicle/Equipment Damage	
<input type="checkbox"/> Tank, Vessel, or Sump/Separator Allowed or Caused to Overfill or Overflow	1. Specify: <input type="radio"/> Valve misalignment <input type="radio"/> Incorrect reference data/calculation <input type="radio"/> Miscommunication <input type="radio"/> Inadequate monitoring <input type="radio"/> Other _____
<input type="checkbox"/> Valve Left or Placed in Wrong Position, but NOT Resulting in a Tank, Vessel, or Sump/Separator Overflow or Facility Overpressure	
<input type="checkbox"/> Pipeline or Equipment Overpressured	
<input type="checkbox"/> Equipment Not Installed Properly	
<input type="checkbox"/> Wrong Equipment Specified or Installed	
<input type="checkbox"/> Other Incorrect Operation	*2. Describe: _____
Complete the following if any Incorrect Operation sub-cause is selected.	
*3. Was this Accident related to: <i>(select all that apply)</i>	
<input type="radio"/> Inadequate procedure <input type="radio"/> No procedure established <input type="radio"/> Failure to follow procedure <input type="radio"/> Other: _____	
*4. What category type was the activity that caused the Accident:	
<input type="radio"/> Construction <input type="radio"/> Commissioning <input type="radio"/> Decommissioning <input type="radio"/> Right-of-Way activities <input type="radio"/> Routine maintenance <input type="radio"/> Other maintenance <input type="radio"/> Normal operating conditions <input type="radio"/> Non-routine operating conditions (abnormal operations or emergencies)	
*5. Was the task(s) that led to the Accident identified as a covered task in your Operator Qualification Program? <input type="radio"/> Yes <input type="radio"/> No	
*5.a If Yes, were the individuals performing the task(s) qualified for the task(s)?	
<input type="radio"/> Yes, they were qualified for the task(s) <input type="radio"/> No, but they were performing the task(s) under the direction and observation of a qualified individual <input type="radio"/> No, they were not qualified for the task(s) nor were they performing the task(s) under the direction and observation of a qualified individual	
G8 – Other Accident Cause - *only one sub-cause can be picked from shaded left-hand column	
<input type="checkbox"/> Miscellaneous	*1. Describe: _____ _____
<input type="checkbox"/> Unknown	*2. Specify: <input type="radio"/> Investigation complete, cause of Accident unknown <input type="radio"/> Still under investigation, cause of Accident to be determined* <i>(*Supplemental Report required)</i>

APPENDIX C
OSRO CONTRACTOR EQUIPMENT LISTS



February 3, 2012

Dear OSRO Customer:

The intent of this letter and applicable attachments is to certify that Clean Venture Inc. has fulfilled its training and required drills in regards to OSRO compliance for **2011**. These requirements have been satisfied through Drills and actual Emergency Response Deployments. Clean Venture Inc. (CVI) is a Coast Guard certified Oil Spill Removal Organization. In the Philadelphia Captain of the Port Zone, CVI holds a level MMPD-WCD3 classification for Rivers and Canals Environments. This rating can be found on the USCG web site. CVI is the Primary Response OSRO for various Philadelphia area organizations such as Sun Co. Inc. (Philadelphia and Marcus Hook and Eagle Point Refineries), Sunoco Logistics - Pipeline Co., Valero Oil Corp. and EXELON Corp.

PRE-PLANNING ACTIVITIES As the Primary OSRO, CVI participates in the pre-planning activities required for effective Oil Spill Response. CVI has participated in various customer drills ranging from small tabletop drills to full-scale equipment deployments. CVI also participates in various inter-agency pre-planning activities such as the Phila. Area Committee and the NJDEP Coastal Inlet Booming Project. These inter-agency activities include representatives from the USCG, the EPA, NOAA, USACOE, DOI/USF&WS, and various other State and Local authorities.

RAPID RESPONSE CVI maintains 24-hr. on the water operations for planned projects as well as emergency situations. CVI has boom deployment boats docked on the Big Timber creek in Westville, NJ and additional deployment boats on trailers at our facility in Camden, NJ. CVI has a 24-hr. On-call Spill Team ready to respond to any Oil or Chemical Emergency. A **one-hour** initial response is available throughout the Phila. COTP zone. Additional containment and recovery equipment is available from our Camden, NJ facility. If necessary our Elizabeth, NJ and Baltimore, MD facilities will provide back-up personnel equipment and materials. All

response times are within the required tier timelines as evidenced by our Coast Guard certification. CVI presently utilizes outboard powered deployment boats in the 18' to 25' range, 18" American Marine Boom is utilized for containment and Vacuum truck mounted skimmer heads are utilized for recovery. A more detailed list of available equipment and materials is enclosed in the attached documents.

Once containment is accomplished CVI will maintain around the clock operations as needed to insure a speedy clean up and to prevent any further discharges.

CVI is respected throughout the Marine Response Community as a dependable and effective service provider. CVI has a good track record with the USCG, the PADEP, the NJDEP and the DBRC.

Sincerely,

A handwritten signature in cursive script, reading "Patrick J. McGovern". The signature is written in black ink and includes a long horizontal flourish at the end.

Patrick McGovern Operations Manager

Enclosures: COTP OSRO Listing CVI Equip/Personnel Site Listing OSRO Prep Certification

Printed: January 13, 03 at 08:27:30

OSRO 0046 - Clean Venture, Inc.
Environmental Area Classification Detailed Amounts Per Rating Category

COTP/ACC Name: BALTIMORE
Operating Area: River Canal

	Facility					Vessel				
	Own	COAM	Actual	Adjust #1	Totals Final	Own	COAM	Actual	Adjust #1	Totals Final
Classification Level: MMPD1										
Available Protective Boom (ft)	10,300	35,000	45,300	41,600	41,600	10,300	35,000	45,300	41,600	41,600
Available Containment Boom (ft)	10,300	35,000	45,300	3,700	3,700	10,300	35,000	45,300	3,700	3,700
Required Containment Boom (ft)			3,700					3,700		
EDRC (bbbls)	10,108	9,051	19,159	19,159	4,248	10,108	9,051	19,159	19,159	4,248
TSC (bbbls)	6,854	1,642	8,496	8,496	8,496	6,854	1,642	8,496	8,496	8,496

	Facility					Vessel				
	Own	COAM	Actual	Adjust #1	Totals Final	Own	COAM	Actual	Adjust #1	Totals Final
Classification Level: WCD1										
Available Protective Boom (ft)	10,300	35,000	45,300	41,600	41,600	10,300	35,000	45,300	41,600	41,600
Available Containment Boom (ft)	10,300	35,000	45,300	3,700	3,700	10,300	35,000	45,300	3,700	3,700
Required Containment Boom (ft)			3,700					3,700		
EDRC (bbbls)	10,108	9,051	19,159	19,159	4,248	10,108	9,051	19,159	19,159	4,248
TSC (bbbls)	6,854	1,642	8,496	8,496	8,496	6,854	1,642	8,496	8,496	8,496

	Facility					Vessel				
	Own	COAM	Actual	Adjust #1	Totals Final	Own	COAM	Actual	Adjust #1	Totals Final
Classification Level: WCD2										
Available Protective Boom (ft)	10,300	35,000	45,300	36,800	36,800	10,300	35,000	45,300	35,900	35,900
Available Containment Boom (ft)	10,300	35,000	45,300	8,500	8,500	10,300	35,000	45,300	9,400	9,400
Required Containment Boom (ft)			8,500					9,400		
EDRC (bbbls)	17,208	18,102	35,310	35,310	12,261	17,208	27,153	44,361	44,361	12,261
TSC (bbbls)	11,587	12,935	24,522	24,522	24,522	11,587	12,935	24,522	24,522	24,522

	Facility					Vessel				
	Own	COAM	Actual	Adjust #1	Totals Final	Own	COAM	Actual	Adjust #1	Totals Final
Classification Level: WCD3										
Available Protective Boom (ft)	10,300	35,000	45,300	35,900	35,900	10,300	35,000	45,300	35,900	35,900
Available Containment Boom (ft)	10,300	35,000	45,300	9,400	9,400	10,300	35,000	45,300	9,400	9,400
Required Containment Boom (ft)			9,400					9,400		
EDRC (bbbls)	17,208	27,153	44,361	44,361	12,261	17,208	27,153	44,361	44,361	12,261
TSC (bbbls)	11,587	12,935	24,522	24,522	24,522	11,587	12,935	24,522	24,522	24,522

*The amounts displayed under Actual Totals for Containment Boom represents the calculated amount required based on the number of skimming systems used + 1000 feet
The adjusted Containment Boom Amount can be limited based on available Boom - The adjusted EDRC may be based on a Containment Boom Limit or TSC amount
Protective Boom + Containment Boom cannot be less than the Available Boom Total*

Printed: January 13, 03 at 08:27:30

OSRO 0046 - Clean Venture, Inc.
Environmental Area Classification Detailed Amounts Per Rating Category

COTP/ACC Name: NEW YORK
 Operating Area: River Canal

	Facility					Vessel				
	Own	COAM	Actual	Adjust #1	Totals Final	Own	COAM	Actual	Adjust #1	Totals Final
Classification Level: MMPD										
Available Protective Boom (ft)	8,800	25,000	33,800	30,100	30,100	10,300	35,000	45,300	41,600	41,600
Available Containment Boom (ft)	8,800	25,000	33,800	3,700	3,700	10,300	35,000	45,300	3,700	3,700
Required Containment Boom (ft)			3,700					3,700		
EDRC (bbbls)	10,108	9,051	19,159	19,159	4,225	10,108	9,051	19,159	19,159	4,248
TSC (bbbls)	6,808	1,642	8,450	8,450	8,450	6,854	1,642	8,496	8,496	8,496

	Facility					Vessel				
	Own	COAM	Actual	Adjust #1	Totals Final	Own	COAM	Actual	Adjust #1	Totals Final
Classification Level: WCD1										
Available Protective Boom (ft)	10,300	35,000	45,300	41,600	41,600	10,300	35,000	45,300	41,600	41,600
Available Containment Boom (ft)	8,800	25,000	33,800	3,700	3,700	10,300	35,000	45,300	3,700	3,700
Required Containment Boom (ft)			3,700					3,700		
EDRC (bbbls)	10,108	9,051	19,159	19,159	4,225	10,108	9,051	19,159	19,159	4,248
TSC (bbbls)	6,808	1,642	8,450	8,450	8,450	6,854	1,642	8,496	8,496	8,496

	Facility					Vessel				
	Own	COAM	Actual	Adjust #1	Totals Final	Own	COAM	Actual	Adjust #1	Totals Final
Classification Level: WCD2										
Available Protective Boom (ft)	10,300	35,000	45,300	37,700	37,700	10,300	35,000	45,300	36,800	36,800
Available Containment Boom (ft)	10,300	35,000	45,300	7,600	7,600	10,300	35,000	45,300	8,500	8,500
Required Containment Boom (ft)			7,600					8,500		
EDRC (bbbls)	17,208	9,051	26,259	26,259	12,261	17,208	18,102	35,310	35,310	12,261
TSC (bbbls)	11,587	12,935	24,522	24,522	24,522	11,587	12,935	24,522	24,522	24,522

	Facility					Vessel				
	Own	COAM	Actual	Adjust #1	Totals Final	Own	COAM	Actual	Adjust #1	Totals Final
Classification Level: WCD3										
Available Protective Boom (ft)	10,300	35,000	45,300	35,900	35,900	10,300	35,000	45,300	35,900	35,900
Available Containment Boom (ft)	10,300	35,000	45,300	9,400	9,400	10,300	35,000	45,300	9,400	9,400
Required Containment Boom (ft)			9,400					9,400		
EDRC (bbbls)	17,208	27,153	44,361	44,361	12,261	17,208	27,153	44,361	44,361	12,261
TSC (bbbls)	11,587	12,935	24,522	24,522	24,522	11,587	12,935	24,522	24,522	24,522

*The amounts displayed under Actual Totals for Containment Boom represents the calculated amount required based on the number of skimming systems used + 1000 feet
 The adjusted Containment Boom Amount can be limited based on available Boom - The adjusted EDRC may be based on a Containment Boom Limit or TSC amount
 Protective Boom + Containment Boom cannot be less than the Available Boom Total*

Printed: January 13, 03 at 08:27:30

OSRO 0046 - Clean Venture, Inc.
Environmental Area Classification Detailed Amounts Per Rating Category

COTP/ACC Name: PHILADELPHIA
Operating Area: River Canal

	Facility					Vessel				
	Own	COAM	Actual	Adjust #1	Totals Final	Own	COAM	Actual	Adjust #1	Totals Final
Classification Level: MMPD										
Available Protective Boom (ft)	10,300	25,000	35,300	31,600	31,600	10,300	35,000	45,300	41,600	41,600
Available Containment Boom (ft)	10,300	25,000	35,300	3,700	3,700	10,300	35,000	45,300	3,700	3,700
Required Containment Boom (ft)			3,700					3,700		
EDRC (bbbls)	10,108	9,051	19,159	19,159	4,248	10,108	9,051	19,159	19,159	4,248
TSC (bbbls)	6,854	1,642	8,496	8,496	8,496	6,854	1,642	8,496	8,496	8,496

	Facility					Vessel				
	Own	COAM	Actual	Adjust #1	Totals Final	Own	COAM	Actual	Adjust #1	Totals Final
Classification Level: WCD1										
Available Protective Boom (ft)	10,300	35,000	45,300	41,600	41,600	10,300	35,000	45,300	41,600	41,600
Available Containment Boom (ft)	10,300	25,000	35,300	3,700	3,700	10,300	35,000	45,300	3,700	3,700
Required Containment Boom (ft)			3,700					3,700		
EDRC (bbbls)	10,108	9,051	19,159	19,159	4,248	10,108	9,051	19,159	19,159	4,248
TSC (bbbls)	6,854	1,642	8,496	8,496	8,496	6,854	1,642	8,496	8,496	8,496

	Facility					Vessel				
	Own	COAM	Actual	Adjust #1	Totals Final	Own	COAM	Actual	Adjust #1	Totals Final
Classification Level: WCD2										
Available Protective Boom (ft)	10,300	35,000	45,300	37,700	37,700	10,300	35,000	45,300	36,800	36,800
Available Containment Boom (ft)	10,300	35,000	45,300	7,600	7,600	10,300	35,000	45,300	8,500	8,500
Required Containment Boom (ft)			7,600					8,500		
EDRC (bbbls)	17,208	9,051	26,259	26,259	12,261	17,208	18,102	35,310	35,310	12,261
TSC (bbbls)	11,587	12,935	24,522	24,522	24,522	11,587	12,935	24,522	24,522	24,522

	Facility					Vessel				
	Own	COAM	Actual	Adjust #1	Totals Final	Own	COAM	Actual	Adjust #1	Totals Final
Classification Level: WCD3										
Available Protective Boom (ft)	10,300	35,000	45,300	35,900	35,900	10,300	35,000	45,300	35,900	35,900
Available Containment Boom (ft)	10,300	35,000	45,300	9,400	9,400	10,300	35,000	45,300	9,400	9,400
Required Containment Boom (ft)			9,400					9,400		
EDRC (bbbls)	17,208	27,153	44,361	44,361	12,261	17,208	27,153	44,361	44,361	12,261
TSC (bbbls)	11,587	12,935	24,522	24,522	24,522	11,587	12,935	24,522	24,522	24,522

*The amounts displayed under Actual Totals for Containment Boom represents the calculated amount required based on the number of skimming systems used + 1000 feet
The adjusted Containment Boom Amount can be limited based on available Boom - The adjusted EDRC may be based on a Containment Boom Limit or TSC amount
Protective Boom + Containment Boom cannot be less than the Available Boom Total*

Printed: January 13, 03 at 08:27:39

OSRO 0046 - Clean Venture, Inc.
Environmental Area Classification Detailed Amounts Per Rating Category

COTP/ACC Name: BALTIMORE
Operating Area: Inland

	Facility					Vessel				
	Own	COAM	Actual	Adjust #1	Totals Final	Own	COAM	Actual	Adjust #1	Totals Final
Classification Level: MMPD										
Available Protective Boom (ft)	10,900	41,000	51,900	48,200	48,200	10,900	41,000	51,900	48,200	48,200
Available Containment Boom (ft)	10,900	41,000	51,900	3,700	3,700	10,900	41,000	51,900	3,700	3,700
Required Containment Boom (ft)			3,700					3,700		
EDRC (bbbs)	10,108	9,051	19,159	19,159	4,248	10,108	9,051	19,159	19,159	4,248
TSC (bbbs)	6,854	1,642	8,496	8,496	8,496	6,854	1,642	8,496	8,496	8,496

	Facility					Vessel				
	Own	COAM	Actual	Adjust #1	Totals Final	Own	COAM	Actual	Adjust #1	Totals Final
Classification Level: WCD1										
Available Protective Boom (ft)	10,900	41,000	51,900	48,200	48,200	10,900	41,000	51,900	48,200	48,200
Available Containment Boom (ft)	10,900	41,000	51,900	3,700	3,700	10,900	41,000	51,900	3,700	3,700
Required Containment Boom (ft)			3,700					3,700		
EDRC (bbbs)	10,108	9,051	19,159	19,159	4,248	10,108	9,051	19,159	19,159	4,248
TSC (bbbs)	6,854	1,642	8,496	8,496	8,496	6,854	1,642	8,496	8,496	8,496

	Facility					Vessel				
	Own	COAM	Actual	Adjust #1	Totals Final	Own	COAM	Actual	Adjust #1	Totals Final
Classification Level: WCD2										
Available Protective Boom (ft)	10,900	51,000	61,900	53,400	53,400	10,900	51,000	61,900	52,500	52,500
Available Containment Boom (ft)	10,900	51,000	61,900	8,500	8,500	10,900	51,000	61,900	9,400	9,400
Required Containment Boom (ft)			8,500					9,400		
EDRC (bbbs)	17,208	18,102	35,310	35,310	12,261	17,208	27,153	44,361	44,361	12,261
TSC (bbbs)	11,587	12,935	24,522	24,522	24,522	11,587	12,935	24,522	24,522	24,522

	Facility					Vessel				
	Own	COAM	Actual	Adjust #1	Totals Final	Own	COAM	Actual	Adjust #1	Totals Final
Classification Level: WCD3										
Available Protective Boom (ft)	10,900	51,000	61,900	52,500	52,500	10,900	51,000	61,900	52,500	52,500
Available Containment Boom (ft)	10,900	51,000	61,900	9,400	9,400	10,900	51,000	61,900	9,400	9,400
Required Containment Boom (ft)			9,400					9,400		
EDRC (bbbs)	17,208	27,153	44,361	44,361	12,261	17,208	27,153	44,361	44,361	12,261
TSC (bbbs)	11,587	12,935	24,522	24,522	24,522	11,587	12,935	24,522	24,522	24,522

*The amounts displayed under Actual Totals for Containment Boom represents the calculated amount required based on the number of skimming systems used + 1000 feet
The adjusted Containment Boom Amount can be limited based on available Boom - The adjusted EDRC may be based on a Containment Boom Limit or TSC amount
Protective Boom + Containment Boom cannot be less than the Available Boom Total*

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OSRO 0046 - Clean Venture, Inc.
Environmental Area Classification Detailed Amounts Per Rating Category

COTP/ACC Name: NEW YORK
Operating Area: Inland

	Facility					Vessel				
	Own	COAM	Actual	Adjust #1	Totals Final	Own	COAM	Actual	Adjust #1	Totals Final
Classification Level: MMPD										
Available Protective Boom (ft)	8,800	31,000	39,800	36,100	36,100	10,900	41,000	51,900	48,200	48,200
Available Containment Boom (ft)	8,800	31,000	39,800	3,700	3,700	10,900	41,000	51,900	3,700	3,700
Required Containment Boom (ft)			3,700					3,700		
EDRC (bbbls)	10,108	9,051	19,159	19,159	4,225	10,108	9,051	19,159	19,159	4,248
TSC (bbbls)	6,808	1,642	8,450	8,450	8,450	6,854	1,642	8,496	8,496	8,496

	Facility					Vessel				
	Own	COAM	Actual	Adjust #1	Totals Final	Own	COAM	Actual	Adjust #1	Totals Final
Classification Level: WCD1										
Available Protective Boom (ft)	10,900	41,000	51,900	48,200	48,200	10,900	41,000	51,900	48,200	48,200
Available Containment Boom (ft)	8,800	31,000	39,800	3,700	3,700	10,900	41,000	51,900	3,700	3,700
Required Containment Boom (ft)			3,700					3,700		
EDRC (bbbls)	10,108	9,051	19,159	19,159	4,225	10,108	9,051	19,159	19,159	4,248
TSC (bbbls)	6,808	1,642	8,450	8,450	8,450	6,854	1,642	8,496	8,496	8,496

	Facility					Vessel				
	Own	COAM	Actual	Adjust #1	Totals Final	Own	COAM	Actual	Adjust #1	Totals Final
Classification Level: WCD2										
Available Protective Boom (ft)	10,900	41,000	51,900	44,300	44,300	10,900	41,000	51,900	43,400	43,400
Available Containment Boom (ft)	10,900	41,000	51,900	7,600	7,600	10,900	41,000	51,900	8,500	8,500
Required Containment Boom (ft)			7,600					8,500		
EDRC (bbbls)	17,208	9,051	26,259	26,259	12,261	17,208	18,102	35,310	35,310	12,261
TSC (bbbls)	11,587	12,935	24,522	24,522	24,522	11,587	12,935	24,522	24,522	24,522

	Facility					Vessel				
	Own	COAM	Actual	Adjust #1	Totals Final	Own	COAM	Actual	Adjust #1	Totals Final
Classification Level: WCD3										
Available Protective Boom (ft)	10,900	51,000	61,900	52,500	52,500	10,900	51,000	61,900	52,500	52,500
Available Containment Boom (ft)	10,900	51,000	61,900	9,400	9,400	10,900	51,000	61,900	9,400	9,400
Required Containment Boom (ft)			9,400					9,400		
EDRC (bbbls)	17,208	27,153	44,361	44,361	12,261	17,208	27,153	44,361	44,361	12,261
TSC (bbbls)	11,587	12,935	24,522	24,522	24,522	11,587	12,935	24,522	24,522	24,522

*The amounts displayed under Actual Totals for Containment Boom represents the calculated amount required based on the number of skimming systems used + 1000 feet
The adjusted Containment Boom Amount can be limited based on available Boom - The adjusted EDRC may be based on a Containment Boom Limit or TSC amount
Protective Boom + Containment Boom cannot be less than the Available Boom Total*

Printed: January 13, 03 at 08:27:39

OSRO 0046 - Clean Venture, Inc.
Environmental Area Classification Detailed Amounts Per Rating Category

COTP/ACC Name: PHILADELPHIA
Operating Area: Inland

	Facility					Vessel				
	Own	COAM	Actual	Adjust #1	Totals Final	Own	COAM	Actual	Adjust #1	Totals Final
Classification Level: MMPD										
Available Protective Boom (ft)	10,900	31,000	41,900	38,200	38,200	10,900	41,000	51,900	48,200	48,200
Available Containment Boom (ft)	10,900	31,000	41,900	3,700	3,700	10,900	41,000	51,900	3,700	3,700
Required Containment Boom (ft)			3,700					3,700		
EDRC (bbbs)	10,108	9,051	19,159	19,159	4,248	10,108	9,051	19,159	19,159	4,248
TSC (bbbs)	6,854	1,642	8,496	8,496	8,496	6,854	1,642	8,496	8,496	8,496

	Facility					Vessel				
	Own	COAM	Actual	Adjust #1	Totals Final	Own	COAM	Actual	Adjust #1	Totals Final
Classification Level: WCD1										
Available Protective Boom (ft)	10,900	41,000	51,900	48,200	48,200	10,900	41,000	51,900	48,200	48,200
Available Containment Boom (ft)	10,900	31,000	41,900	3,700	3,700	10,900	41,000	51,900	3,700	3,700
Required Containment Boom (ft)			3,700					3,700		
EDRC (bbbs)	10,108	9,051	19,159	19,159	4,248	10,108	9,051	19,159	19,159	4,248
TSC (bbbs)	6,854	1,642	8,496	8,496	8,496	6,854	1,642	8,496	8,496	8,496

	Facility					Vessel				
	Own	COAM	Actual	Adjust #1	Totals Final	Own	COAM	Actual	Adjust #1	Totals Final
Classification Level: WCD2										
Available Protective Boom (ft)	10,900	41,000	51,900	44,300	44,300	10,900	41,000	51,900	43,400	43,400
Available Containment Boom (ft)	10,900	41,000	51,900	7,600	7,600	10,900	41,000	51,900	8,500	8,500
Required Containment Boom (ft)			7,600					8,500		
EDRC (bbbs)	17,208	9,051	26,259	26,259	12,261	17,208	18,102	35,310	35,310	12,261
TSC (bbbs)	11,587	12,935	24,522	24,522	24,522	11,587	12,935	24,522	24,522	24,522

	Facility					Vessel				
	Own	COAM	Actual	Adjust #1	Totals Final	Own	COAM	Actual	Adjust #1	Totals Final
Classification Level: WCD3										
Available Protective Boom (ft)	10,900	51,000	61,900	52,500	52,500	10,900	51,000	61,900	52,500	52,500
Available Containment Boom (ft)	10,900	51,000	61,900	9,400	9,400	10,900	51,000	61,900	9,400	9,400
Required Containment Boom (ft)			9,400					9,400		
EDRC (bbbs)	17,208	27,153	44,361	44,361	12,261	17,208	27,153	44,361	44,361	12,261
TSC (bbbs)	11,587	12,935	24,522	24,522	24,522	11,587	12,935	24,522	24,522	24,522

*The amounts displayed under Actual Totals for Containment Boom represents the calculated amount required based on the number of skimming systems used + 1000 feet
The adjusted Containment Boom Amount can be limited based on available Boom - The adjusted EDRC may be based on a Containment Boom Limit or TSC amount
Protective Boom + Containment Boom cannot be less than the Available Boom Total*

CVI
LOCATION OF EQUIPMENT AND PERSONNEL RESOURCES (1/12)

Elizabeth NJ –CVI Operations Branch, Corporate Office

Field Personnel - 70 .
 Vacuum Trucks (3000gl.-5500gl) – 10 and 7 Vactors – 8 Combo/Jet Vacs .
 Oil Containment Boom – 4000' (20" AMI) .
 Work/Boom Deployment Boats (18'-30') – 6 (all towable)
 (< 18") - 3

Elizabeth NJ– CCI Temporary Storage Disposal Fac.,

Field Personnel –21
 Emergency Tank Capacity- 82,500 gallon

Elizabeth NJ– Transportation Branch,

Field Personnel – 9
 Emergency Tank Capacity- (Vacuum Boxes 20 Roll-offs 60)
 Vacuum Trucks (5000gl.-5500gl)-3
 Roll-off Movers 7

Clayton NJ – Operations Branch

Field Personnel - 35 .
 Vacuum Trucks (3000gl.-5500gl) – 5 and 3-Vactor .
 Vacuum type skimmer heads – 4 .
 DESMI TERMINATOR Skimmer 502 GPM – 2 .
 Oil Containment Boom – 5000'(20" AMI) and (600'x 43" "CAROLINA"Ocean
 Boom) 1000-Swamp Boom (12" AMI) .
 Work/Boom Deployment Boats (18'-26') – 8 (all towable)
 (< 18") – 4

Baltimore MD – Operations Branch

Field Personnel - 35 .
 Vacuum Trucks (3000gl.-5500gl) – 7 and 3 Vactors .
 Oil Containment Boom – 2500'(20" AMI) .
 Work/Boom Deployment Boats (18'-30') – 1
 (< 18") - 3

Salisbury MD– Clean Venture (TPH) Operations Branch

Field Personnel – 10 .
Vacuum Trucks (3000gl.-5500gl) – 3 and 2 Vactor .
Oil Containment Boom – TBD .
Work/Boom Deployment Boats (16'-30') – 1

Lewisberry PA – Operations / TSDF,/ Transportation Branch

Field Personnel – 12 .
Emergency Tank Capacity- 45, 000 gallons +Vacuum Boxes 2 Roll-offs 10
Vacuum Trucks (3000gl.-5500gl) - 2
Roll Off Movers 2

MA – General Chemical TSDF, Operations Branch

Field Personnel – 10 .
Vacuum Trucks (3000gl.-5500gl) – 4 and 1 Vactor .
Oil Containment Boom – 1000' .
Work/Boom Deployment Boats (16'-30') – 1

Note: All locations provide 24 hour Emergency Response for Oil and Hazardous Materials. In addition to the above listed equipment, all facilities maintain a complete inventory of materials and equipment to support response to any type of Environmental Incident. Portable Temporary Storage, Material Handling, Construction, Excavation and Transportation equipment is available at all facilities.

Please also note that CVI's TSDF's provide the added value of pre-approved final disposal outlets. These pre-approvals greatly expedite the process of moving multiple loads of bulk solids and liquid wastes during both Emergency and Planned operations.



Date: March 2, 2011

OSRO Customer

***RE: OIL SPILL RESPONSE CONTRACTOR EQUIPMENT CERTIFICATION FORM
COMPLIANCE YEAR 2011***

Dear: Sir

In response to your request for documentation that Clean Venture, Inc., as an Oil Spill Removal Organization (OSRO), has deployed a representative sample of equipment in your operating environment, enclosed please find our certification.

I hope you find our submittal satisfactory.

Should you have any questions or require any additional information, please do not hesitate to contact me.

Thank you.

Sincerely,

Patrick S. McGovern

*Patrick S. McGovern
Operations Manager*

**OIL SPILL RESPONSE
CERTIFICATION FORM
(PREP GUIDELINE – EQUIPMENT DEPLOYMENT EXERCISE)**

COMPLIANCE YEAR 2011

Name of Oil Spill Removal Organization (OSRO):

Clean Venture, Inc.

<i>Exercise Dates</i>	<i>Location of Exercise</i>	<i>Drill or Actual Response</i>	<i>Duration of Exercise</i>
March 2, 2011	Sunoco Chemicals Frankford Plant - Dock	Drill- 400 Gallons Cumene Discharge	1 DAY

(1) *Equipment deployed was:*

- Facility-Owned
 Oil spill removal organization – owned. If so, which OSRO? CVI
 Both

(2) *List type and amount of all equipment (e.g. boom and skimmers) deployed and number of support personnel employed:*

18-26 FOOT DEPLOYMENT BOATS -1 1-5K Gallon Vacuum Truck
2000 FOOT 18" HARBOR BOOM /2 X 20# ANCHOR SYSTEMS
1-Skimmer Unit MISC. SORBENTS and Equipment Trailer
MARINE RESPONSE PERSONNEL (10 persons)

(3) *Describe goals of the equipment deployment and list any Area Contingency Plan strategies tested.*

MOBILIZED EQUIPMENT AND PERSONNEL TO RESPOND TO CUMENE DISCHARGE ON THE DELAWARE RIVER. DISCHARGE WAS A RESULT OF THE FAILURE OF DOCK PIPING. IMPLEMENTED AREA PROTECTIVE BOOMING STRATEGY, PLACED AND MAINTAINED APPROXIMATELY 1000 FEET OF BOOM IN AFFECTED AREAS. MANNED AND OPERATED BOOM DEPLOYMENT BOATS AND VACUUM TRUCK WITH SKIMMER. MONITORED FOR HAZARDOUS ATMOSPHERE, CONSIDERED THE USE OF AIR GEAR DURING MARINE

RESPONSE

- (4) For deployment of facility-owned equipment, was the amount of equipment deployed at least the amount necessary to respond to your facility's average most probable spill?
Yes N/A No _____
- (5) For deployment of OSRO-owned equipment, was a representative sample (at least 1000 feet of boom type) deployed?
Yes X No _____
- (6) Was the equipment deployed in its intended operating environment?
Yes X No _____
- (6) Are all facility personnel that are responsible for response operations involved in a comprehensive training program?
Yes.
- (7) If yes, please describe the program.
Clean Venture, Inc, employees are members of our in-house training program. All field personnel are 40-hour OSHA HAZWOPER trained as per section 29 CFR 1910.120. Employees also receive annual 8-hour refresher training and fit testing. Supervisors receive 8-hour OSHA Supervisor training. Specialized employees receive Confined Space Entry, CPR, First Aid, Fork-lift Safety and DOT HM 215 training.
- (8) Are all pollution equipment involved in a comprehensive maintenance program?
Yes
- (9) If yes, please describe the program.
All equipment is decontaminated at the end of a response. In addition, all equipment is inspected prior to being deployed. In addition, all Clean Venture, Inc. equipment is subject to quarterly maintenance checks.
- (10) Was the equipment deployed by personnel responsible for its deployment in the event of an actual spill?
Yes X No _____
- (11) Identify which of the 15 core components of your response plan were executed during this particular exercise:

ALL COMPONENTS (1 THRU !5) WERE CONSIDERED AND EXECUTED WHERE NEEDED
--

(12) *Attach a description of lesson(s) learned and person(s) responsible for follow up of corrective measures*

(b) (7)(F)



- B) Consider assigning a person to Dock gate during clean-up to aid in access to dock*
- C) Contractor to survey alternate routes to facility and alternate launch facilities*

I certify that the deployment entailed above shows that we as an Oil Spill Response Organization meet the criteria and requirements under the National Preparedness for Response Exercise Program (PREP) under OPA 90' for the year 20011.

A handwritten signature in cursive script, appearing to read "Patrick S. McGovern".

*Certifying Signature
Patrick S. McGovern
Operations Manager*

March 2, 2011
Date



Date: July 7, 2011

OSRO Customer

***RE: OIL SPILL RESPONSE CONTRACTOR EQUIPMENT CERTIFICATION FORM
COMPLIANCE YEAR 2011***

Dear: Sir

In response to your request for documentation that Clean Venture, Inc., as an Oil Spill Removal Organization (OSRO), has deployed a representative sample of equipment in your operating environment, enclosed please find our certification.

I hope you find our submittal satisfactory.

Should you have any questions or require any additional information, please do not hesitate to contact me.

Thank you.

Sincerely,

Patrick S. McGovern

*Patrick S. McGovern
Operations Manager*

**OIL SPILL RESPONSE
CERTIFICATION FORM
(PREP GUIDELINE – EQUIPMENT DEPLOYMENT EXERCISE)**

COMPLIANCE YEAR 2011

Name of Oil Spill Removal Organization (OSRO):

Clean Venture, Inc.

<i>Exercise Dates</i>	<i>Location of Exercise</i>	<i>Drill or Actual Response</i>	<i>Duration of Exercise</i>
<i>June 29, 2011</i>	<i>NuStar Asphalt Co. 121 BBLs Crude at Dock</i>	CG-Government Initiated UNANNOUNCED Oil Spill Response Drill	<i>1 DAY</i>

(1) *Equipment deployed was:*

- Facility-Owned*
 Oil spill removal organization – owned. If so, which OSRO? CVI
 Both

(2) *List type and amount of all equipment (e.g. boom and skimmers) deployed and number of support personnel employed:*

<i>18-26 FOOT DEPLOYMENT BOATS -1 1-5K Gallon Vacuum Truck</i>
<i>1000 FOOT 18" HARBOR BOOM /2 X 20# ANCHOR SYSTEMS</i>
<i>1-Skimmer Unit MISC. SORBENTS and Equipment Trailer</i>
<i>MARINE RESPONSE PERSONNEL (5 persons)</i>

(3) *Describe goals of the equipment deployment and list any Area Contingency Plan strategies tested.*

MOBILIZED EQUIPMENT AND PERSONNEL TO RESPOND TO CRUDE OIL DISCHARGE ON THE DELAWARE RIVER. DISCHARGE WAS A RESULT OF EQUIPMENT FAILURE AT DOCK. IMPLEMENTED AREA PROTECTIVE BOOMING STRATEGY, PLACED AND MAINTAINED APPROXIMATELY 1000 FEET OF BOOM IN AFFECTED AREAS. MANNED AND OPERATED BOOM DEPLOYMENT BOAT

AND VACUUM TRUCK WITH SKIMMER. MONITORED FOR HAZARDOUS ATMOSPHERE.

- (4) *For deployment of facility-owned equipment, was the amount of equipment deployed at least the amount necessary to respond to your facility's average most probable spill?*
 Yes N/A No _____
- (5) *For deployment of OSRO-owned equipment, was a representative sample (at least 1000 feet of boom type) deployed?*
 Yes X No _____
- (6) *Was the equipment deployed in its intended operating environment?*
 Yes X No _____
- (6) *Are all facility personnel that are responsible for response operations involved in a comprehensive training program?*
Yes.
- (7) *If yes, please describe the program.*
Clean Venture, Inc. employees are members of our in-house training program. All field personnel are 40-hour OSHA HAZWOPER trained as per section 29 CFR 1910.120. Employees also receive annual 8-hour refresher training and fit testing. Supervisors receive 8-hour OSHA Supervisor training. Specialized employees receive Confined Space Entry, CPR, First Aid, Fork-lift Safety and DOT HM 215 training.
- (8) *Are all pollution equipment involved in a comprehensive maintenance program?*
Yes
- (9) *If yes, please describe the program.*
All equipment is decontaminated at the end of a response. In addition, all equipment is inspected prior to being deployed. In addition, all Clean Venture, Inc. equipment is subject to quarterly maintenance checks.
- (10) *Was the equipment deployed by personnel responsible for its deployment in the event of an actual spill?*
 Yes X No _____
- (11) *Identify which of the 15 core components of your response plan were executed during this particular exercise:*

<i>ALL COMPONENTS (1 THRU !5) WERE CONSIDERED AND EXECUTED WHERE NEEDED</i>

(12) *Attach a description of lesson(s) learned and person(s) responsible for follow up of corrective measures*

(b) (7)(F)

B) Contractor to consider effectiveness of bring boom by water from alternate launch facilities

I certify that the deployment entailed above shows that we as an Oil Spill Response Organization meet the criteria and requirements under the National Preparedness for Response Exercise Program (PREP) under OPA 90' for the year 2011.



*Certifying Signature
Patrick S. McGovern
Operations Manager*

July 7, 2011
Date

**AMENDMENT NUMBER ONE AMENDMENT OF EMERGENCY SERVICES
AGREEMENT
CONTRACT #CW16624**

THIS FIRST AMENDMENT OF EMERGENCY SERVICES AGREEMENT (this "FIRST Amendment") is entered into as of the 1st day of July, 2011, by and between Sunoco Pipeline L.P. and/or Sunoco Partners Marketing & Terminals L.P. (both, collectively, "Sunoco"), and Clean Venture, Inc. ("Contractor").

WITNESSETH:

Contractor and Sunoco are parties to that certain "Emergency Services Agreement" dated as of July 1, 2008 (the "Emergency Services Agreement"), Contractor and Sunoco wish to amend the Emergency Services Agreement for the purposes of extending the Initial Term.

NOW THEREFORE, in consideration of the promises set forth in the Agreement and for other good and valuable consideration, the receipt of which is hereby acknowledged, and intending to be legally bound, the parties hereto agree as follows:

**ARTICLE I
AMENDMENTS TO AGREEMENT**

1.1 **Amendment.** In the event there is a conflict between the terms and conditions of this First Amendment and the terms and conditions of the Emergency Services Agreement, the terms and conditions of this First Amendment shall control. The Emergency Services Agreement and this First Amendment shall hereinafter be referred to collectively as the "Agreement".

1.2 **Amended Sections.**

1.2.1 Sunoco and Contractor agree to extend the Initial Term of the Agreement for a period of two additional years as provided for in "Article 5 – Term" of the Agreement.

1.2.2 All references in the Agreement to Sunoco Logistics Partners L. P. are hereby deleted and replaced with the following: Sunoco Pipeline L.P. and/or Sunoco Partners Marketing & Terminals L.P.

**ARTICLE II
GENERAL PROVISIONS**

2.1 **Effective Date of First Amendment.** This First Amendment is effective as of July 1, 2011.

2.2 **Governing Law.** This First Amendment shall be construed, governed and enforced in accordance with the laws of the Commonwealth of Pennsylvania.

2.3 **Counterparts.** This First Amendment may be executed by the parties hereto in any number of separate counterparts and all of such counterparts when together shall be deemed to constitute one and the same instrument.

AMENDMENT NUMBER ONE AMENDMENT OF EMERGENCY SERVICES
AGREEMENT
CONTRACT #CW16624

2.4 **Captions.** The paragraph headings which appear at the beginning of each Section herein are included only for convenience of reference and are not intended to constitute a part of this First Amendment.

2.5 **Partial Invalidity.** If any provision of this First Amendment or the application thereof to any person or circumstances shall to any extent be held invalid, then the remainder of this First Amendment or the application of such provision to persons or circumstances other than those to which it is held invalid shall not be affected thereby, and each provision of this First Amendment shall be valid and enforced to the fullest extent permitted by law.

2.6 **Authorization.** The signatories to this First Amendment are duly authorized to execute this Amendment on behalf of Contractor and Sunoco.

2.7 **Reaffirmation of Agreement.** Except as expressly amended hereby, the Agreement shall remain in full force and effect and the parties hereby ratify and confirm their rights, duties and obligations under the Agreement, including, without limitation, any waiver of jury trial therein contained.

This space is intentionally left blank. The signature page follows.

AMENDMENT NUMBER ONE AMENDMENT OF EMERGENCY SERVICES
AGREEMENT
CONTRACT #CW16624

IN WITNESS WHEREOF, the parties hereto have entered into this First Amendment as of the day and year first written above.

SUNOCO PIPELINE L.P.
SUNOCO PARTNERS MARKETING & TERMINALS L.P.

By: *Dale L. Morgan*
Title: *Contract Writer*
Date: *6/30/11*

ARAG 6/30/11

Clean Venture, Inc.

By: *Patrick A. McLean*
Title: *Operations Manager CVI*
Date: *6/30/11*

FIELD SERVICES CONTRACT											
 Sunoco Logistics <small>Logistics</small>	Authorized By	Gus Borkland									
	Requested By	Gus Borkland	Date 12/19/2012								
Project Number / Facility Number	Approved By: Gus Borkland										
Information Regarding This Contract Can Be Supplied By Maria Camarre 610-859-1628	Dollar Value for DOA approval: \$100,000.00	<input type="checkbox"/> One-Time Contract <input checked="" type="checkbox"/> On-Going Services Contract									
Account or Appropriation Number	Contract Number G12098	<input type="checkbox"/> Release Against On-Going Services Contract									
To Contractor: Specialized Response Solutions, L.P. 411 Bollinger Blvd. Fort Worth, TX 76108 Attn: Emily Spears espears@specializedresponse.com	Phone: 817-246-3338	Invoice to: Sunoco Pipeline L.P. and/or Sunoco Partners Marketing & Terminals L.P. 525 Fritztown Road, Sinking Spring, PA 19608 Attn: Accounts Payable									
<p>This CONTRACT, effective December 19, 2012 between Sunoco Pipeline L.P. and/or Sunoco Partners Marketing & Terminals L.P. and all subsidiaries and affiliates hereinafter called (Owner) having an office at 525 Fritztown Road, Sinking Spring, PA 19608 and the Contractor shown above.</p> <p>WITNESS in consideration of the mutual promises herein made, Owner and Contractor agree as follows:</p> <p>ARTICLE 1 - THE WORK: The Work shall consist of: Contractor's response to hazardous materials transportation incidents and releases of hazardous materials to the environment. For purposes of example only and not limitation, Contractor may be required to: travel to the location of the release immediately upon notification by Sunoco; prevent or stop releases at the point of origin (e.g. transferring materials from tanks, pipelines or vessels, plugging leaks in rail, truck or pipeline equipment); secure the site of the release to prevent harm to human health and the environment (e.g. sandbagging storm drains, relieving pressure on vessels or tanks to prevent explosion, establishing a water spray on a vapor release, covering a liquid pool with foam, extinguishing fires); coordinate with Sunoco, local authorities and other emergency responders; remove and contain hazardous materials from the environment; arrange for the disposal of hazardous materials; report and keep records of the Work. The Work shall be performed at the site location of the release, which may be on public highways or property, private roadways, railways or property, pipeline or railroad rights of way, Owner facilities, or other industrial, commercial, or residential property. All work to be performed in accordance with the Oil Pollution Act of 1990 (OPA 90). All work is to be performed in accordance with all exhibits included herein and under the general direction of Owner designated Project Manager and/or his designee.</p> <p>CONTRACTOR: shall perform all work hereunder in accordance with the terms and conditions of this Contract and the following as noted: Exhibits:</p> <table border="0"> <tr> <td>A - Emergency Response Terms & Conditions amended</td> <td>E - Scope of Work</td> </tr> <tr> <td>B - Safety and Security Requirements for Pipeline and Terminals</td> <td>F - Contractor Rate Schedule</td> </tr> <tr> <td>C - DOT Requirements</td> <td>G - Insurance Certificate & Pollution Liability Insurance</td> </tr> <tr> <td>D - Pre Planning and Contractor Response Requirements</td> <td>H - OQ Requirements</td> </tr> </table> <p>Contractor shall furnish any and all personnel, equipment, and other things necessary for the performance and completion of all work authorized hereunder. All personnel shall be fully trained, certified, and competent to perform the Work. This Contract, including General Terms and Conditions and all attachments and Exhibits appended hereto or referenced herein shall constitute the Contract between the parties.</p> <p>ARTICLE 2 - MATERIALS, PERSONNEL AND SUBCONTRACTS: Contractor shall furnish all labor, supervision, permits (unless otherwise stated herein), machinery, equipment, tools, fuel, supplies facilities, materials, transportation and all other things necessary for the performance and completion of all work hereunder, except items noted to be specifically supplied by Owner as follows: As specified in each contract release document as issued by Owner. Unless otherwise specified, all materials to be furnished by Contractor shall be new and of a grade and quality which conforms to Owner's Standards, if such apply; otherwise such material must be suitable for the use intended.</p> <p>ARTICLE 3 - COMPENSATION: For satisfactory performance of the Work, Owner agrees to pay Contractor as hereinafter specified, and Contractor agrees to accept as full and complete payment for providing such Work, compensation as follows: On a time and materials or lump sum basis in accordance with, Exhibit F - Contractor Rate Schedule, and as specified in each release issued against this contract.</p> <p>ARTICLE 4 - TERMS OF PAYMENT: Net thirty (30) days upon receipt of proper and correct invoice and approval of Owner's authorized representative. The contract number G12098 must be identified on all contract releases, invoices and supporting documentation. Prior to final payment hereunder, and as a condition thereto Contractor shall satisfy the requirements of General Terms and Conditions, Paragraph 16.</p> <p>ARTICLE 5 - TERM: The Term of this Contract shall commence on December 19, 2012 and shall terminate on December 31, 2015. All work performed at the site shall be on the basis of Contractor's standard work week as set forth by Local agreement. No overtime shall be worked, except for spot overtime, unless approved by Owner in writing.</p> <p>ARTICLE 6 - CHANGES, ADDITIONS AND/OR DELETIONS: Owner reserves the continuing right to make changes, additions and/or deletions to the Work as it may deem necessary. All changes, additions or deletions shall be made in writing and accepted by both parties before Contractor proceeds with such Work. The cost of such changes, additions or deletions shall be determined as agreed between Owner and Contractor.</p> <p>ARTICLE 7 - INSURANCE: Contractor shall take out, carry and maintain in insurance company or companies, and in policies of insurance acceptable to Owner, the insurance with limits not less than indicated for the respective items, as specified in General Terms and Conditions, Paragraph 14.</p>				A - Emergency Response Terms & Conditions amended	E - Scope of Work	B - Safety and Security Requirements for Pipeline and Terminals	F - Contractor Rate Schedule	C - DOT Requirements	G - Insurance Certificate & Pollution Liability Insurance	D - Pre Planning and Contractor Response Requirements	H - OQ Requirements
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Contract Instructions: To: Sunoco Pipeline L.P. 525 Fritztown Road Sinking Spring, PA 19608 Attn: Procurement & Supply Chain		END OF CONTRACT ARTICLES The term State wherever used in this contract shall be deemed to include the Commonwealth of Puerto Rico. In witness whereof, the parties have executed this Contract. This Contract is subject to the terms and conditions shown on the reverse side hereof or attached hereto which are incorporated herein.									
Contractor shall sign and return one fully executed copy of this Contract and all future contract notices to the address shown above. If no address is shown above, copy shall be returned to the Invoice To: address at the top.		OWNER: DATE <u>3/20/2013</u> BY: <u>McCamarse</u> TITLE: <u>Procurement Management</u>	CONTRACTOR: DATE <u>3/15/13</u> BY: <u>R.W. (Bobby) Bneed</u> TITLE: <u>President</u>								
Distribution:	Contractor	Owner	Accounts Payable Materials Management								

**Specialized Response Solutions
G12098**

Contractor Requirement Checklist

Contractors must indicate their intention to comply with the following, which are hereby made a part of the Pre-Qualification Process. Any exceptions must be explicitly noted and explanation attached.

- | | <u>Will Comply?</u> |
|---|---|
| 1. Insurance Requirements | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No |
| 2. MLP Field Services Terms and Conditions | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No |
| 3. 49 CFR PART 199 Drug and Alcohol Testing | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No |
| 4. Safety and Security for MLP West | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No |
| 5. OQ Compliance Requirements | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No |

ALL EMPLOYEES OF CONTRACTOR, SUBCONTRACTORS AND DELIVERY PERSONNEL MUST HAVE TWIC CARDS.

After completing your response to the above compliance questions, please sign, date and return with all applicable documents.

Contractor: Specialized Response Solutions
 Signature: C. E. J. Spears
 Title: Business Manager
 Date: 3/20/13

APPENDIX D
EMERGENCY MANAGEMENT
TEAM JOB DESCRIPTIONS

APPENDIX D

EMERGENCY MANAGEMENT TEAM JOB DESCRIPTIONS AND GUIDELINES

Sunoco Logistics personnel will work in unison, following Incident Command protocols, to cooperate with and assist Fire, Police and other first responders with halting or redirecting traffic on roads and railroads in the affected area as appropriate.

In the event of a failure of a pipeline, the SXL H&S department will employ instrumentation (appropriate for the product contained in the pipeline at the time of failure) to access and determine the extent and coverage of a potential vapor cloud if present.

The instrumentation used in the determination will have the following capabilities:

Petroleum Products

- Combustible gas meter with 0-100% read out. Alarm calibrated to sound at 10% of LEL.
- Ability to quantify the following gases: O₂, H₂S, NO₂ and SO₂

LPG

- Photoionization Detector with the capabilities of detecting and quantifying ethane in air.

Note: All instrumentation regardless of product should be intrinsically safe.

The following job descriptions and guidelines are intended to be used as a tool to assist EMT members in their particular positions within the Incident Command System (ICS):

- Incident Commander
- Public Information Officer
- Liaison Officer
- Safety Officer
- Operations Section Chief
- Staging Group Leader
- Repair Group Leader
- Containment Group Leader
- Planning Section Chief
- Environmental Group Leader
- Situation Group Leader
- Logistics Section Chief
- Communications Group Leader
- Security/Medical Group Leader

- Supply/Ground Support Group Leader
- Finance Section Chief
- Accounting Group Leader
- Claims Group Leader
- Legal Group Leader
- Business Resumption Section Chief
- Repair Coordinator

INCIDENT COMMANDER

The Incident Commander (IC) manages all activities related to an emergency response and acts as Qualified Individual (QI). As such, the Incident Commander needs to be familiar with the contents of the Facility Response Plan (FRP), Oil Spill Response Plan (OSRP), Emergency Response Action Plan (ERAP), and the Spill Prevention Control and Countermeasure Plan (SPCC). The Incident Commander (IC) must also be familiar with the operation of the Incident Command System (ICS) and the Unified Command Structure (UCS).

The primary goal of this system is to establish and maintain control of the emergency response. If the emergency involves a multi-jurisdictional response (Federal and State), the Unified Command Structure (UCS) should be established. **Realize that the Federal On-Scene Coordinator (FOSC) does have the authority to override the Incident Commander and assume control of the response.** Every effort should be made to establish a collaborative relationship to manage the incident site with the appropriate responding agencies.

As soon as possible following an incident, a critique will be conducted of the response with follow-up action items assigned as appropriate. Participants may include Operations and Control personnel, company supervisors, employees and outside agencies involved in the response.

Responsibilities:

- Maintain Activity Log.
- Establish Incident Command/Unified Command Post.
- Activate necessary section(s) of the Incident Command System (ICS) to deal with the emergency. Fill out the appropriate section(s) of the Incident Command organization chart and post it at the Incident Command Center.
- Develop goals and objectives for response.
- Work with Safety Officer and Planning Section Chief to develop a Site Safety Plan (SSP).
- Approve, authorize, and distribute Incident Action Plan (IAP) and SSP.
- Conduct planning meetings and briefings with the section chiefs.
- As Qualified Individual coordinate actions with Federal On-Scene Coordinator (FOSC) and State On-Scene Coordinator (SOSC).
- In a multi-jurisdictional response, ensure all agencies are represented in the ICS.
- Coordinate /approve media information releases with the FOSC, SOSC, and Public Information Officer (PIO).
- Keep management informed of developments and progress.
- Authorize demobilization of resources as they are no longer needed.
- Complete Standard Incident Debriefing Form

PUBLIC INFORMATION OFFICER

The Public Information Officer (PIO) provides critical contact between the media/public and the emergency responders. The PIO is responsible for developing and releasing information about the incident to the news media, incident personnel, appropriate agencies and public. When the response is multi-jurisdictional (involves the federal and state agencies), the PIO must coordinate gathering and releasing information with these agencies.

The PIO needs to communicate that the Company is conducting an effective response to the emergency. The PIO is responsible for communicating the needs and concerns of the public to the Incident Commander (IC).

Responsibilities:

- Maintain Activity Log.
- Obtain briefing from IC.
- Participate in all planning meetings and briefings.
- Obtain outside information that may be useful to incident planning.
- Develop goals and objectives regarding public information.
- Arrange for necessary workspace, materials, telephones and staffing for Public Information Center (PIC).
- Establish a PIC, ensuring all appropriate agencies participate.
- Provide a single point of media contact for the IC.
- Coordinate media access to the response site as approved by the IC.
- Obtain approval for release of information from the IC.
- Arrange for meetings between media and emergency responders.
- Maintain list of all media present.
- Participate in Post Incident Review.

LIAISON OFFICER

If a Unified Command Structure is not established, a Liaison Officer is appointed as the point of contact for personnel assigned to the incident from assisting or cooperating agencies.

Responsibilities:

- Maintain Activity Log.
- Obtain briefing from Incident Commander (IC).
- Participate in planning meetings and briefings.
- Identify and maintain communications link with agency representatives, assisting, and coordinating agencies.
- Identify current or potential inter-organizational issues and advise IC as appropriate.
- Coordinate with Legal Group Leader and Public Information Officer (PIO) regarding information and documents released to government agencies.
- Participate in Post Incident Review

SAFETY OFFICER

The Safety Officer is responsible for assessing and monitoring hazardous and unsafe situations at the emergency response site(s). The Safety Officer must develop measures that assure the safety of the public and response personnel. This involves maintaining an awareness of active and developing situations, ensuring the preparation and implementation of the Site Safety Plan (SSP) and assessing safety issues related to the Incident Action Plans (IAP).

Responsibilities:

- Maintain Activity Log.
- Obtain briefing from Incident Commander (IC).
- Develop, implement, and disseminate SSP with IC and section chiefs.
- Participate in planning meetings and briefings.
- Establish safety staff if necessary.
- Identify emergency contact numbers. Fill out emergency contact chart and post in the Incident Command Center.
- Conduct safety briefings with all emergency responders.
- Investigate accidents that have occurred during emergency response.
- Ensure proper hazard zones are established.
- Ensure all emergency responders have appropriate level of training.
- Ensure proper Personal Protective Equipment (PPE) is available and used.
- Advise Security/Medical Group Leader concerning PPE requirements.
- Ensure emergency alarms/warning systems are in place as needed.
- Participate in Post Incident Review

OPERATIONS SECTION CHIEF

The Operations Section Chief is responsible for the management of all operations applicable to the field response and site restoration activities. Operations directs field activities based on the Incident Action Plan (IAP) and Site Safety Plan (SSP).

Responsibilities:

- Maintain Activity Log.
- Obtain briefing from Incident Commander (IC).
- Participate in Incident Command planning meetings and briefings.
- Conduct planning meetings and briefings for Operations Section.
- Develop operations portion of IAP.
- Supervise the implementation of the IAP.
- Make or approve expedient changes to the IAP.
- Request resources needed to implement IAP.
- Approve list of resources to be released.
- Ensure safe tactical operations.
- Establish a staging area for personnel and equipment.
- Confirm first responder actions.
- Confirm the completion of rescue/evacuation and administering of first aid.
- Confirm site perimeters have been established.
- Coordinate activities of public safety responders, contractors, and mutual assistance organizations.
- Participate in Post Incident Review

STAGING GROUP LEADER

The Staging Group Leader is responsible for managing all activities within the staging area(s). The Staging Group Leader will collect, organize, and allocate resources to the various response locations as directed by Operations Section Chief.

Responsibilities:

- Maintain Activity Log.
- Obtain briefing from Operations Section Chief.
- Participate in Operations' planning meetings and briefings.
- Advise Operations Section Chief of equipment location and operational status.
- Periodically advise Operations Section Chief on inventory status of consumable items (sorbent pads, sorbent boom, etc.).
- Coordinate with Logistics Section Chief regarding inbound equipment, personnel, and supplies.
- Participate in development of Operations' portion of Incident Action Plan (IAP).
- Establish check-in function and inventory control as appropriate.
- Allocate personnel/equipment to site(s) as requested.
- Establish and maintain boundaries of staging area(s).
- Demobilize/relocate staging area as needed.
- Post signs for identification and traffic control.
- Participate in Post Incident Review

REPAIR GROUP LEADER

The Repair Group Leader is responsible for supervising the repair and restoration of pipeline facilities.

Responsibilities:

- Maintain Activity Log.
- Obtain briefing from Operations Section Chief.
- Periodically advise Operations Section Chief on status of restoration activities.
- Conduct frequent hazard assessments and coordinate safety needs with Operations Section Chief and Safety Officer.
- Participate in Operations' planning meetings and briefings.
- Participate in development of Operations' portion of Incident Action Plan (IAP).
- Conduct facility restoration activities in accordance with Company procedures, Site Safety Plan (SSP) and IAP.
- Determine and request additional materials, equipment, and personnel as needed.
- Ensure all equipment is decontaminated prior to being released.
- Participate in Post Incident Review

CONTAINMENT GROUP LEADER

The Containment Group Leader is responsible for supervising the containment and recovery of spilled product and contaminated environmental media both on land and on water.

Responsibilities:

- Maintain Activity Log.
- Obtain briefing from Operations Section Chief.
- Participate in Operations' planning meetings and briefings.
- Participate in development of Operations' portion of Incident Action Plan (IAP).
- Conduct activities in accordance with the IAP.
- Assess overall situation for containment and recovery needs and supervise group activities.
- Periodically advise the Operations Section Chief on the status of containment and recovery actions.
- Ensure hazard zones are established and maintained.
- Ensure adequate communication equipment for the containment group response.
- Determine and request additional resources as needed.
- Participate in Post Incident Review

PLANNING SECTION CHIEF

The Planning Section Chief is responsible for collecting, evaluating, and disseminating information related to the current and future events of the response effort. The Planning Section Chief must understand the current situation; predict the future course of events; predict future needs; develop response and cleanup strategies; and review the incident once complete.

The Planning Section Chief must coordinate activities with the Incident Commander (IC) and other Section Chiefs to ensure that current and future needs are appropriately handled.

Responsibilities:

- Maintain Activity Log.
- Obtain briefing from the IC.
- Establish and maintain communication with IC and other Section Chiefs.
- Advise IC on any significant changes of incident status.
- Conduct planning meetings and briefings for Planning section.
- Coordinate and provide input to the preparation of the Incident Action Plan (IAP).
- Participate in Incident Command planning meetings and briefings.
- In a multi-jurisdictional response, ensure that all agencies are represented in the Planning Section.
- Coordinate future needs for the emergency response.
- Determine response personnel needs.
- Determine personnel needs and request personnel for Planning section.
- Assign technical specialists (archaeologists, historians, biologists, etc.) where needed.
- Collect and analyze information on the situation.
- Assemble information on alternative response and cleanup strategies.
- Ensure situation status unit has a current organization chart of the Incident Command Organization.
- Provide periodic spill movement/migration prediction.
- Participate in Post Incident Review

ENVIRONMENTAL GROUP LEADER

The Environmental Group Leader is responsible for ensuring that all areas impacted by the release are identified and cleaned up following company and regulatory standards. The Environmental Group Leader supports Planning and Operations to minimize and document the environmental impact of the release.

The Environmental Group Leader must plan for future site considerations such as long-term remediation and alternative response strategies in unusually sensitive areas. In a Unified Command Structure (UCS), representatives from the federal and state responding agencies will be included in this group.

Responsibilities:

- Maintain Activity Log.
- Obtain briefing from the Planning Section Chief.
- Participate in Planning section meetings and briefings.
- Participate in development of Planning's portion of Incident Action Plan (IAP).
- Coordinate environmental activities with responding regulatory agencies.
- Periodically advise the Planning Section Chief on status of group activities.
- Request additional personnel/specialists to support response effort.
- Determine environmental group resource needs.
- Identify and develop a prioritized list of natural, cultural, and economic (NCE) resources at risk.
- Initiate and coordinate Natural Resources Damage Assessment (NRDA) activities.
- Develop a management plan for recovered contaminated media and ensure coordination with Containment Group Leader.
- Ensure proper management of injured/oiled wildlife.
- Determine alternative cleanup strategies for response.
- Participate in Post Incident Review

SITUATION GROUP LEADER

The Situation Group Leader is responsible for the collection, evaluation, display, and dissemination of all information related to the emergency response effort. The Situation Group Leader must establish and maintain communications with all portions of the Incident Command and the response site in order to collect the information. The Situation Group Leader also attempts to predict spill movement/migration and identifies areas that may be impacted by the emergency.

Responsibilities:

- Maintain Activity Log.
- Obtain briefing from the Planning Section Chief.
- Participate in Planning section meetings and briefings.
- Participate in development of Planning's portion of Incident Action Plan (IAP).
- Maintain a master list of response resources ordered, in staging and in use.
- Collect and display current status of requested response resources.
- Collect and display current status of resources, current spill location, personnel, and weather.
- Analyze current information to determine spill trajectory and potential impacts.
- Disseminate information concerning the situation status upon request from the emergency responders.
- Provide photographic services and maps.
- Establish periodic reconnaissance of impacted area to support information needs.
- Collect information on the status of the implementation of Incident Action Plans. Display this information in the Incident Command Center.
- Participate in Post Incident Review

LOGISTICS SECTION CHIEF

The Logistics Section Chief is responsible for procuring facilities, services, and material in support of the emergency response effort.

Responsibilities:

- Maintain Activity Log.
- Obtain briefing from the Incident Commander (IC).
- Participate in Incident Command planning meetings and briefings.
- Conduct planning meetings and briefings for Logistics section.
- Participate in the preparation of the Incident Action Plan (IAP).
- Identify service and support requirements for planned operations.
- Identify sources of supply for identified and potential needs.
- Advise IC on current service and support requirements.
- Procure needed materials, equipment and services from sources by means consistent with the timing requirements of the IAP and Operations.
- Ensure all purchases are documented.
- Participate in Post Incident Review

COMMUNICATIONS GROUP LEADER

The Communications Group Leader is responsible for ensuring that the Incident Command and emergency responders have reliable and effective means of communication. This may involve activation of multiple types of communications equipment and coordination among multiple responding agencies and contractors.

Responsibilities:

- Maintain Activity Log.
- Obtain briefing from Logistics Section Chief.
- Periodically advise Logistics Section Chief on status of communications group.
- Participate in Logistics section planning meetings and briefings.
- Participate in development of Logistics' portion of Incident Action Plan (IAP).
- Establish an Incident Command communications center.
- Ensure Incident Commander (IC) has communications compatible with other response agencies.
- Identify all communications circuits/equipment used by emergency responders and keep a chart updated with this information.
- Determine the type and amount of communications required to support the response effort (computer, radio, telephone, fax, etc.).
- Ensure timely establishment of adequate communications equipment and systems.
- Advise Logistics Section Chief on communications capabilities/limitations.
- Establish an equipment inventory control system for communications gear.
- Ensure all equipment is tested and repaired.
- Participate in Post Incident Review

SECURITY/MEDICAL GROUP LEADER

The Security/Medical Group Leader is responsible for developing a plan to deal with medical emergencies, obtaining medical aid and transportation for emergency response personnel, and preparation of reports and records.

The Security/Medical Group Leader is responsible for providing safeguards needed to protect personnel and property from loss or damage. The Security/Medical Group Leader also controls access to the emergency site and Incident Command Center.

Responsibilities:

- Maintain Activity Log.
- Obtain briefing from Logistics Section Chief.
- Periodically advise Logistics Section Chief on the status of security and medical problems.
- Participate in Logistics meetings and briefings.
- Participate in development of Logistics' portion of Incident Action Plan (IAP).
- Determine and develop security/medical support plan needs.
- Request medical or security personnel, as needed.
- Work with Safety Officer to identify/coordinate local emergency medical services.
- Coordinate with Safety Officer and Operations Section Chief to establish the Site Safety Plan (SSP) with site boundaries, hazard zones, escape routes, staging areas, Command Center and Personal Protective Equipment (PPE) requirements.
- Coordinate/develop an identification system in order to control access to the incident site.
- Participate in Post Incident Review

SUPPLY/GROUND SUPPORT GROUP LEADER

The Supply/Ground Support Group Leader is responsible for procurement and the disposition of personnel, equipment, and supplies; receiving and storing all supplies for the incident; maintaining an inventory of supplies; and servicing non-expendable supplies and equipment. The Supply/Ground Support Group Leader supports the following: transportation of personnel; supplies, food, equipment; and fueling, service, maintenance and repair of vehicles and equipment.

Responsibilities:

- Maintain Activity Log.
- Obtain briefing from Logistics Section Chief.
- Periodically advise Logistics Section Chief on status of supply/ground support group.
- Participate in Logistics meetings and briefings.
- Participate in development of Logistics' portion of Incident Action Plan (IAP).
- Communicate with Staging Group Leader concerning material, equipment and personnel that are inbound and the approximate time of arrival.
- Coordinate with other Section Chiefs to ascertain the priority of needed materials, equipment and services.
- Coordinate with Finance Section Chief to establish accounts, purchase orders, AFEs and procedures as necessary.
- Establish an inventory control system for materials and equipment.
- Maintain roads, when necessary.
- Participate in Post Incident Review

FINANCE SECTION CHIEF

The Finance Section Chief is responsible for accounting, legal, right-of-way and risk management functions that support the emergency response effort. In this role, the primary responsibility is supporting the Command Staff and Logistics Section matters pertaining to expenses during and following the emergency response.

Responsibilities:

- Maintain Activity Log.
- Obtain briefing from Incident Commander (IC).
- Participate in Incident Command planning meetings and briefings.
- Conduct planning meetings and briefings for Finance section.
- Participate in preparation of the Incident Action Plan (IAP).
- Participate in planning meetings.
- Participate in Unified Command System (UCS) as incident warrants.
- Request assistance of corporate accounting, legal, right-of-way or risk management as needed.
- Assist with contracting administration.
- Participate in Post Incident Review

ACCOUNTING GROUP LEADER

The Accounting Group Leader is responsible for accumulating and dispensing funding during an emergency response. All charges directly attributed to the incident should be accounted for in the proper charge areas.

Responsibilities:

- Maintain Activity Log.
- Obtain briefing from Finance Section Chief.
- Periodically advise Finance Section Chief.
- Participate in Finance planning meetings and briefings.
- Participate in development of Finance's portion of Incident Action Plan (IAP).
- Make recommendations for cost savings to Finance and Logistics Section Chiefs.
- Establish accounts as necessary to support the Logistics section.
- Ensure all invoices are documented, verified, and paid accordingly.
- Involve corporate accounting group for assistance as necessary.
- Participate in Post Incident Review

CLAIMS GROUP LEADER

The Claims Group Leader is responsible for managing all risk management and right-of-way issues at, during, and following an emergency response. It is important that all claims are investigated and handled expediently.

Responsibilities:

- Maintain Activity Log.
- Obtain briefing from Finance Section Chief.
- Participate in Finance planning meetings and briefings.
- Participate in development of Finance's portion of Incident Action Plan (IAP).
- Periodically inform affected parties of status of emergency response.
- Review and authorize payment of all claims.
- Provide needs of evacuated persons or groups.
- Purchase or acquire property.
- Inform and update necessary insurance groups and underwriters.
- Involve corporate Risk Management or Land, Records, and Claims as needed.
- Participate in Post Incident Review

LEGAL GROUP LEADER

The Legal Group Leader is responsible for advising the Incident Command Staff and Section Chiefs on all matters that may involve legal issues.

Responsibilities:

- Maintain Activity Log.
- Obtain briefing from Finance Section Chief.
- Periodically advise Finance Section Chief of status.
- Participate in Finance planning meetings and briefings.
- Participate in development of Finance's portion of Incident Action Plan (IAP).
- Conduct investigations per Incident Commander's (IC) request.
- Provide skilled negotiators.
- Communicate to all affected emergency response personnel if work product is declared "Attorney-Client Privilege. "
- Participate in Post Incident Review

BUSINESS RESUMPTION SECTION CHIEF

The Business Resumption Section Chief is responsible for managing and directing activities of the repair crews and contractors.

Responsibilities:

- Establish and direct the repairs activities.
- Ensure that all work is done in a manner to ensure the safety of all employees and the public.
- Establish and direct any required staging activities.
- Participate in Post Incident Review

REPAIR COORDINATOR

The Repair Coordinator is responsible for the timely, efficient, and safe repair of the damaged pipeline segment so that loss of service will be as brief as possible without compromising safety or integrity of repair. Ensure that temporary and/or permanent repair of the affected asset is done in accordance with approved methods.

Responsibilities:

- Determine extent and cause of damage.
- Obtain necessary materials, personnel and equipment to repair damage.
- Plan and execute repairs.
- Verify that repairs are complete and sound using proven test methods (x-ray, hydrostatic test or other accepted methods) and in compliance with DOT requirements.
- Supervise completion of repair by the use of proper back-fill materials and techniques.
- Return the ROW to acceptable condition.
- Inform the Incident Commander when pipeline is ready for return to service.
- Coordinate activities with HES and DOT representatives.
- Participate in Post Incident Review

Maps and figures have been redacted in accordance with the FOIA Exemption 7(F).