



**Sunoco Logistics**



**Sunoco Pipeline L.P.  
Facility Response Plan  
PHMSA Sequence Number 965  
Region II –Montello 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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	- State of Pennsylvania General Reporting Guidelines
	- Pennsylvania Department of Environmental Protection Regional Office Map with Contact Information
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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 Region II - Montello Response Zone. The pipelines are owned by Sunoco Partners 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 United States Coast Guard, Sector Delaware Bay Area Contingency Plan (ACP). Specifically, this Plan is intended to satisfy:

- Pipeline and Hazardous Materials Safety Administration (PHMSA), U.S. Department of Transportation requirements 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 Region II – Montello Response Zone is presented below:

**TABLE 1-1 – REGION II – MONTELLO RESPONSE ZONE INFO. SUMMARY**

<b>Owner:</b> Sunoco Partners Pipeline L.P. 1818 Market Street, Suite 1500 Philadelphia, PA 19103-1699 Phone: (215) 977-3000 Fax: (215) 977-3409	<b>Operator:</b> Sunoco Pipeline L.P. 1818 Market Street, 15th Floor Philadelphia, PA 19103
<b>Qualified Individuals:</b>	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)
	Dave Chalson Vice President Operations (610) 859-5754 (Office) (215) 620-0287 (Mobile)
	Charles Stewart Area Manager (215) 937-6243 (Office) (215) 669-3222 (Mobile)
	John Foltz Operations Supervisor (610) 670-3305 (Office) (610) 401-3234 (Mobile)
	Jerry Higgins Technical Supervisor (610) 670-3218 (Office) (610) 858-3838 (Mobile)
	<b>Qualified Individuals Continued</b>

<b>Pipeline Description:</b>	The Sunoco Pipeline L.P. Region II – Montello Pipeline System transports product (gasoline, jet fuel, and fuel oil) in Pennsylvania.
<b>Response Zone:</b>	The Region II – Montello Response Zone includes pipelines and facilities in the following counties of Pennsylvania:  Berks, Chester, Cumberland, Dauphin, Lancaster, Lebanon, Luzerne, Montgomery, Montour, Northumberland, Schuylkill

**TABLE 1-2 – DESCRIPTION OF LINE SEGMENTS/STATIONS**

Line Segments	Description	Counties	Refined Petroleum Products
	(b) (7)(F)	Berks, Chester	Product
		Berks, Chester	Product
		Berks, Lancaster, Lebanon, Dauphin, Cumberland	Product
		Berks, Schuylkill, Northumberland,	Product
		Berks, Schuylkill,	Product
		Berks, Lancaster	Product
		Berks	Product
		Berks, Schuylkill	Product
		Schuylkill,	Product

Facilities	Description	County	# of Tanks
	(b) (7)(F)	Luzerne	N/A
		Schuylkill	N/A
		Berks	N/A
		Berks	N/A
		Berks	25
		Chester	N/A
		Northumberland	N/A
		Northumberland	N/A
		Lebanon	N/A
		Cumberland	N/A
		Perry	N/A

<b>Alignment Maps Location(s): (Piping, Plan Profiles)</b>	Maintained in an electronic database
<b>Spill Detection and Mitigation Procedures:</b>	Refer to <b>SECTION 3</b>
<b>Worst Case Discharge:</b>	(b) (7)(F)

<b>Statement of Significant and Substantial Harm:</b>	<p>Basis for Operator's Determination of Significant and Substantial Harm</p> <ul style="list-style-type: none"> <li>• At least one pipeline in the Response Zone is greater than 6 5/8 inches and most pipelines are longer than 10 miles</li> <li>• At least one section of pipeline crosses a river, meeting the requirement for location within one-mile of an environmentally sensitive area</li> <li>• Therefore, the potential to cause significant and substantial harm is present within the entire Response Zone</li> </ul>

### 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 the Sector Delaware Bay ACP.

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Mark Martin  
Operations Supervisor  
SUNOCO PIPELINE, 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:

- Facility/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**

<b>FACILITY RESPONSE TEAM</b>		
<b>Name/Title</b>	<b>Contact Information</b>	<b>Response Time</b>
<b>Charles Stewart</b> Area Manager <b>Qualified Individual</b>	(215) 937-6243 (Office) (215) 669-3222 (Mobile)	1-3 hours
John Foltz Operations Supervisor <b>Qualified Individual</b>	(610) 670-3305 (Office) (610) 401-3234 (Mobile)	1-3 hours
Jerry Higgins Technical Supervisor <b>Qualified Individual</b>	(610) 670-3218 (Office) (610) 858-3838 (Mobile)	1-3 hours
Mark Martin Operations Supervisor <b>Qualified Individual</b>	(610) 670-3278 (Office) (610) 212-2514 (Mobile)	1-3 hours

**TABLE 2-2 – ERP CONTACT INFORMATION**

<b>EMERGENCY RESPONSE PERSONNEL CONTACT INFORMATION</b>			
<b>Name/Title</b>	<b>Contact Information</b>	<b>Response Time</b>	<b>Responsibilities During Response Action</b>
Charles Stewart Area Manager <b>Qualified Individual</b>	(215) 937-6243 Office (215) 669-3222 Mobile	1-3 hrs.	Incident Commander
Gus Borkland HES & S Manager <b>Qualified Individual</b>	(215) 977-6136 Office (215) 620-5934 Mobile	4-6 hrs.	Operations
Dave Chalson Vice President <b>Qualified Individual</b>	(215) 339-1331 Office (215) 620-0287 Mobile	4-6 hrs.	Operations/Planning
John Foltz Operations Supervisor <b>Qualified Individual</b>	(610) 670-3305 Office (610) 401-3234 Mobile	1-3 hrs.	Planning
Nick Wilkerson Health & Safety Manager <b>Qualified Individual</b>	(859) 371-4469 Office (859) 940-6020 Mobile	4-6 hrs.	Logistics
Stephanie Welch Health and Safety Specialist	(610) 927-2069 Office (215) 778-2221 Mobile	1-3 hrs.	Safety
Christopher Embry Emergency Response Coordinator	(610) 670-3237 Office (215) 478-4144 Mobile	1-3 hrs.	Environmental Liaison
Al Kravatz DOT Compliance Coordinator	(215) 937-6278 Office (215) 435-0234 Mobile	2-4 hrs.	Regulatory Liaison

TABLE 2-3 – REGULATORY AGENCY CONTACT INFORMATION

REGULATORY AGENCY CONTACT INFORMATION		
Agency	Phone Number	Reporting Requirements
<b>Federal Agencies</b>		
National Response Center (NRC)  <i>NRC will contact all other federal agencies including USDOT/PHMSA and EPA</i>	(800)424-8802 or (202) 267-2675	<b>Any spill on water.</b>  Telephonic notification is required within <b>2 hours</b> following the discovery of a release that resulted in any discharge to water
U.S. Department of Transportation/Pipeline Hazardous Materials Safety Administration (PHMSA)	(800)424-8802 or (202) 267-2675	<p><b><u>Telephonic Notification</u></b> At the earliest practicable moment following discovery of a release of the hazardous liquid resulting in an event described above, the operator shall give notice of any failure that:</p> <ul style="list-style-type: none"> <li>• Caused a death or a personal injury requiring hospitalization</li> <li>• Resulted in either a fire or explosion not intentionally set by the operator</li> <li>• Caused estimated property damage, including cost of clean up and recovery, value of lost product, and damage to the property of the operator or others, or both, exceeding \$50,000</li> <li>• Resulted in pollution of any stream, river, lake, reservoir, or other similar body of water that violated applicable water quality standards, caused a discoloration of the surface of the water or adjoining shoreline, or deposited a sludge or emulsion beneath the surface of the water or upon adjoining shorelines or</li> <li>• In the judgment of the operator was significant even though it did not meet the criteria of any of the above.</li> </ul> <p><b><u>Written Reporting</u></b>  A 7000-1 report is required within 30 days after discovery of the accident for each failure in a pipeline system regulated by DOT 195 in which there is a release of the hazardous liquid transported resulting in any of the following:</p>

<p>U.S. Department of Transportation/Pipeline Hazardous Materials Safety Administration (PHMSA) Continued...</p>		<ul style="list-style-type: none"> <li>• Explosion or fire not intentionally set by the operator</li> <li>• Release of 5 gallons or more of hazardous liquid except that no report is required for a release of less than 5 barrels resulting from a pipeline maintenance activity if the release is: <ul style="list-style-type: none"> <li>• Not otherwise reportable under this section</li> <li>• Not on water</li> <li>• Confined to company property or pipeline right-of-way and</li> <li>• Cleaned up promptly</li> </ul> </li> <li>• Death of any person</li> <li>• Personal injury necessitating hospitalization</li> <li>• Estimated property damage, including cost of clean-up and recovery, value of lost product, and damage to the property of the operator or others, or both, exceeding \$50,000.</li> <li>• A supplemental report shall be filed within 30 days of receiving any changes in the information reported or additions to the original DOT 7000-1 report.</li> </ul>
<b>State Agencies</b>		
<p>Pennsylvania Department of Environmental Protection</p> <p>Region I – Norristown (Southeast) Region II – Wilkes-Barre (Northeast) Region III – Harrisburg (S. Cent.) Region IV – Williamsport (N. Cent.) Region V – Pittsburgh (Southwest) Region VI – Meadville (Northwest)</p>	<p>(800) 541-2050 In-state (717) 787-5027 Out of State</p> <p>(484) 250-5900 (570) 826-2511 (877) 333-1904 (570) 327-3636 (412) 442-4000 (800) 373-3398</p>	<p>Any oil spill of <b>5 gallons or more</b> into waters of the commonwealth or onto lands from which it might flow or drain into waters of the commonwealth (waters of the commonwealth include surface and underground water).</p> <p style="text-align: center;">SEE DISTRICT MAP IN APPENDIX B</p> <p><b>***If possible, provide notification Within 2 Hours to known downstream water users who could be potentially affected. If this cannot be completed, request that the County Emergency Mgmt. Agency complete this task***</b></p>
<p>Pennsylvania Emergency Management Agency (24 hr)</p>	<p>(800) 424-7362</p>	

**TABLE 2-4 – EMERGENCY SERVICES CONTACT INFORMATION**

<b>EMERGENCY SERVICES BY COUNTY</b>	
<b>Organization</b>	<b>Phone Number</b>
Berks County, PA Police LEPC	911 (610) 374-4800
Chester County, PA Police LEPC	911 (610) 344-5000
Cumberland County, PA Police LEPC	911 (717) 240-6400
Dauphin County, PA Police LEPC	911 (717) 558-6800
Lancaster County, PA Police LEPC	911 (717) 664-1200
Lebanon County, PA Police LEPC	911 (717) 272-7621
Luzerne County, PA Police LEPC	911 (570) 820-4400
Montour County, PA Police LEPC	911 (570) 271-3047
Northumberland County, PA Police LEPC	911 (570) 988-4539

<b>EMERGENCY SERVICES BY COUNTY</b>	
<b>Organization</b>	<b>Phone Number</b>
Schuylkill County, PA Police LEPC	911 (570) 622-3739

**TABLE 2-5 - CONTRACTOR CONTACT INFORMATION**

<b>CONTRACTOR INFORMATION</b>	
<b>Organization</b>	<b>Phone Number</b>
<b>USCG Classified OSRO's</b>	
Lewis Environmental Group Royersford , PA	(610) 495-6695 (610) 495-6697 (Fax)
Clean Venture, Inc.	(908) 354-0210 (24-hrs.) (856) 863-8778
Northridge Group, Inc. Northumberland, PA.	570-473-3219
React Environmental Services, Inc. Philadelphia , PA	(800) 326-2439 (215) 729-2777 (215) 729-8678(Fax)
National Response Corporation	(800) 899-4672
<b>Wildlife Rehabilitation</b>	
Tri-State Bird Rescue Research Center, Newark, DE	(302) 737-7241 (800) 710-0695

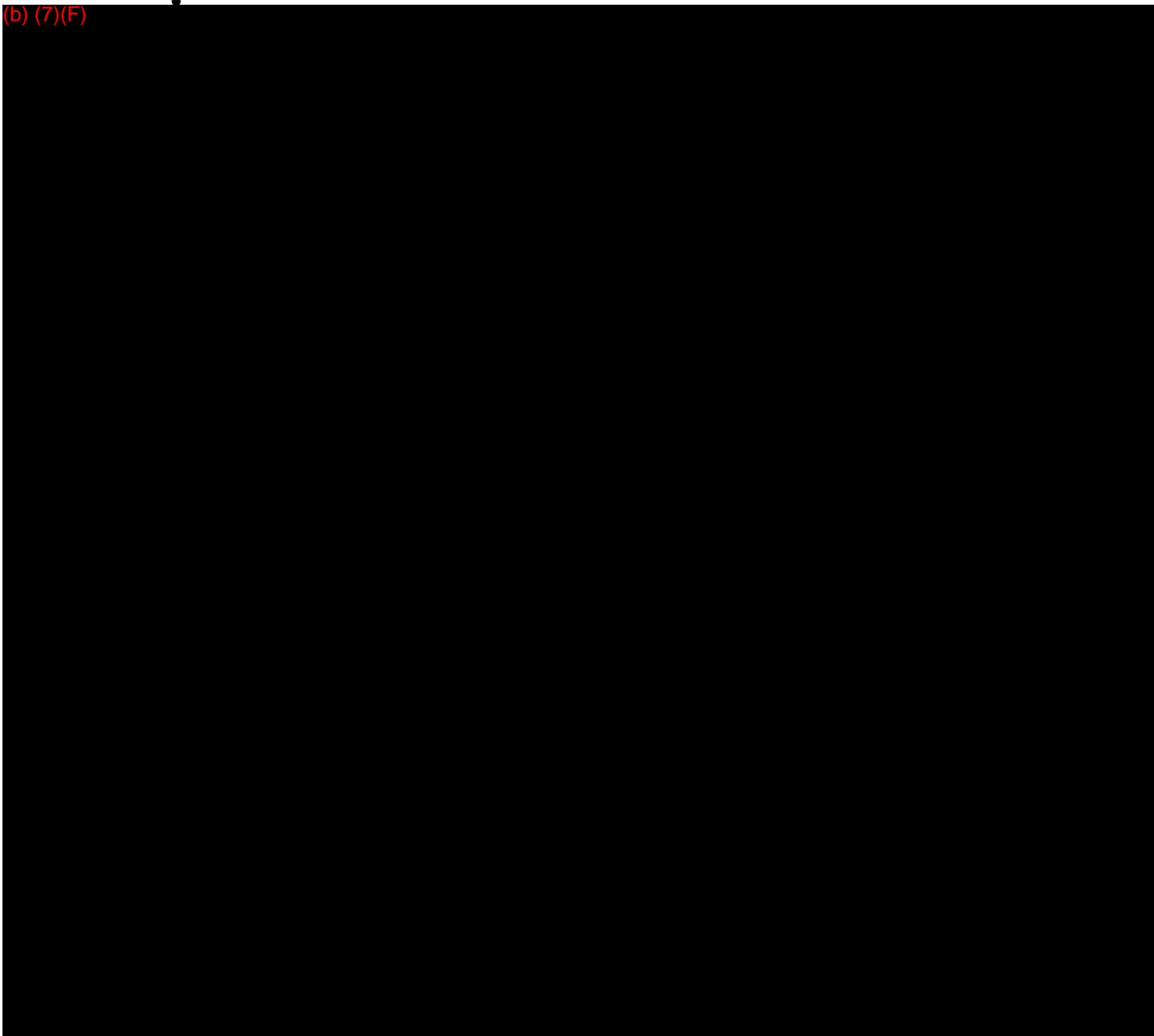
### 3.0 SPILL DETECTION AND ON-SCENE SPILL MITIGATION PROCEDURES

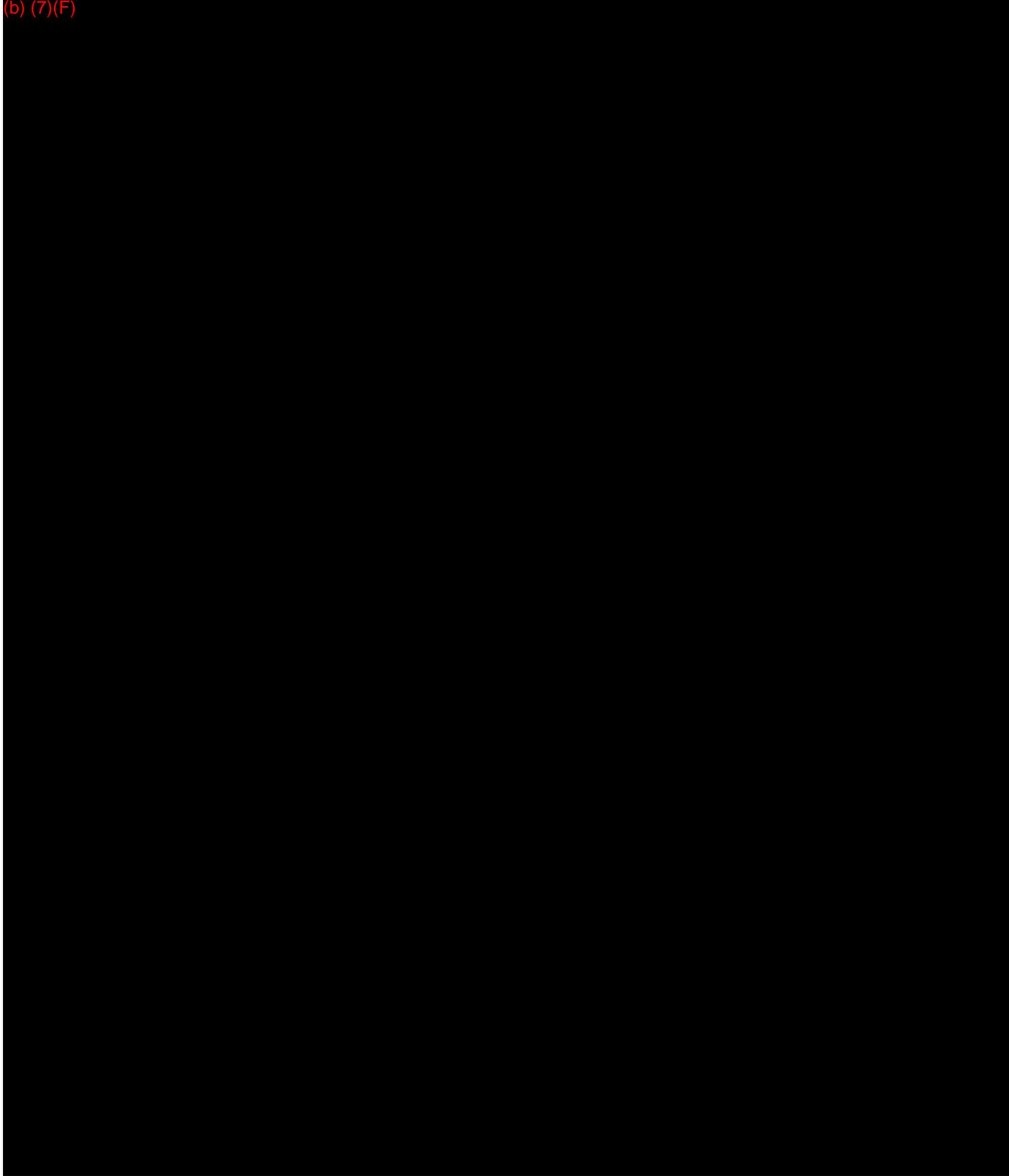
#### 3.1 Spill Detection

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 field personnel or pipeline patrols

(b) (7)(F)





All operators are compliant with DOT 195 Operator Qualification Requirements.

### 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 directly over the pipeline right-of-way for leaks, exposed pipes, washes, missing markers, and other unusual conditions. Construction 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 marker 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 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 Control 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 Sector Delaware Bay ACP, 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**

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



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

### 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 local 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: O<sub>2</sub>, H<sub>2</sub>S, NO<sub>2</sub> and SO<sub>2</sub>

##### **LPG**

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

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

**4.1 Spill Response Actions Checklist** 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
<b>DOCUMENT ALL ACTIONS TAKEN</b>		
<b>First Person to Discover Spill</b>		
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.		
<b>Qualified Individual</b>		
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"> <li>• National Response Center</li> <li>• Appropriate State Agency</li> </ul>		
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
<b>Qualified Individual (Continued)</b>		
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 ( <b>APPENDIX B</b> ) and phone this information to the HES Manager.		
<b>On-Scene Coordinator</b>		
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 potentially necessary). <b>It is much better to demobilize equipment and personnel if not needed than to delay contacting them if they are needed.</b>		
Document all response actions taken, including notifications, agency/media meetings, equipment and personnel mobilization and deployment, and area impacted.		
<b>Water Based Spills:</b> Initiate spill tracking and surveillance operations utilizing information in <b>SECTION 4.2</b> . Determine extent of pollution via surveillance aircraft or vehicle. Estimate volume of spill utilizing information in <b>SECTION 4.3</b> . Send photographer /videographer if safe.		
<b>Land Based Spills:</b> Initiate spill tracking and surveillance if applicable.		
<b>SECONDARY RESPONSE ACTIONS</b> (Refer to ERP job descriptions in <b>APPENDIX D</b> )		

## 4.2 Spill Tracking and Surveillance

The use of the Sector Delaware Bay ACP may be consulted and 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**

<b>SPILL SURVEILLANCE CHECKLIST</b>	
<b>General Information</b>	
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):
<b>Oil Observations</b>	
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):	
<b>Considerations</b>	
<ul style="list-style-type: none"> <li>• During surveillance, go beyond known impacted areas to check for additional oil spill sites</li> <li>• Include the name and phone number of the person making the observations</li> <li>• Clearly describe the locations where oil is observed and the areas where no oil has been seen</li> </ul>	
<b>Other Observations</b>	



### 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: The Control Center will determine volumes using all available information, which can include but not limited to: 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: The Control Center will determine volumes using all available information, which can include but not limited to: 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 <sup>2</sup>	liters/km <sup>2</sup>
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 ERP is composed of Company personnel from offices within the Area. Additional personnel from outlying offices can be used (if needed). The ERP 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 ERP will handle all communications with the media and the public. Job descriptions for each ERP member are provided in **APPENDIX D**. The ERP will train by participating in exercises as noted in **SECTION 6**.

Activation of the ERP 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 PHMSA and the 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 – STANDARD INCIDENT DEBRIEFING (SELF ASSESSMENT) FORM**

#

/170-11: \_\_\_\_\_

#

Date: \_\_\_\_\_

**Check as appropriate**

<b>Type of Exercise:</b>			
Table Top Drill <input type="checkbox"/>	Equipment Deployment <input type="checkbox"/>	Emergency Procedures <input type="checkbox"/>	Actual Spill <input type="checkbox"/>
Exercise was: Announced <input type="checkbox"/>	Unannounced <input type="checkbox"/>		
Scenario: Average Most Probable <input type="checkbox"/>	Maximum Most Probable <input type="checkbox"/>	Worst Case <input type="checkbox"/>	

<p><b>Section I.</b> 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.</p>

Participants/Evaluation Team	Company

*(Attach roster sheet if required)*

Qualified Individuals:

\_\_\_\_\_

\_\_\_\_\_

Date Evaluation Conducted: \_\_\_\_\_

## Section II. Exercise / Incident Response Evaluation

<b>Check Off Plan Components Exercised:</b>	
<input type="checkbox"/> Notifications <input type="checkbox"/> Staff Mobilization <input type="checkbox"/> Ability to Operate within ICS <input type="checkbox"/> Discharge Control <input type="checkbox"/> Assessment <input type="checkbox"/> Containment <input type="checkbox"/> Recovery	<input type="checkbox"/> Protection <input type="checkbox"/> Disposal <input type="checkbox"/> Communications <input type="checkbox"/> Transportation <input type="checkbox"/> Personnel Support <input type="checkbox"/> Equipt Maint/Support <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"> <li>• All field personnel will be trained to properly report/monitor spills</li> <li>• Plan will be reviewed annually with all employees and contract personnel</li> <li>• A record of Personnel Response Training will be maintained.</li> </ul>
OSHA Training Requirements	<ul style="list-style-type: none"> <li>• All Company responders designated in Plan must have 24 hours of initial spill response training               <ul style="list-style-type: none"> <li>• Laborers having potential for minimal exposure must have 24 hours of initial oil spill response instruction and 8 hours of actual field experience</li> <li>• 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</li> <li>• On-site management/supervisors required to receive same training as equipment operators/general laborers plus 8 hours of specialized hazardous waste management training</li> <li>• Managers/employees require 8 hours of annual refresher training</li> </ul> </li> </ul>
Spill Management Team Personnel Training	<ul style="list-style-type: none"> <li>• Will follow EPP-101</li> </ul>
Training for Casual Laborers or Volunteers	<ul style="list-style-type: none"> <li>• Company will not use casual laborers/volunteers for operations requiring HAZWOPER training</li> </ul>
Wildlife	<ul style="list-style-type: none"> <li>• Only trained personnel approved by USFWS and appropriate state agency will be used to treat oiled wildlife</li> </ul>
Training Documentation and Record Maintenance	<ul style="list-style-type: none"> <li>• Training activity records will be retained five years for all personnel following completion of training</li> <li>• Company will retain training records indefinitely for individuals assigned specific duties in Plan</li> <li>• Training records will be retained.</li> </ul>

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"> <li>• Carry out emergency procedures established under 195.402 that relate to their assignments;</li> <li>• 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;</li> <li>• 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;</li> <li>• 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</li> <li>• Learn the proper use of fire-fighting procedures and equipment, fire suits, and breathing apparatus by utilizing, where feasible, a simulated pipeline emergency condition.</li> </ul> <p>At intervals not exceeding 15 months, but at least once each calendar year, the Company shall:</p> <ul style="list-style-type: none"> <li>• Review with personnel their performance in meeting the objectives of the emergency response training program set forth in 195.403(a), and</li> <li>• Make appropriate changes to the emergency response training program as necessary to ensure that it is effective.</li> </ul> <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"> <li>• Identify covered tasks;</li> <li>• Ensure through evaluation that individuals performing covered tasks are qualified;</li> <li>• 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;</li> <li>• 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;</li> <li>• Evaluate an individual if the operator has reason to believe that the individual is no longer qualified to perform a covered task;</li> <li>• Communicate changes that affect covered tasks to individuals performing these covered tasks; and</li> <li>• Identify those covered tasks and the intervals at which evaluation of the individual's qualifications is needed.</li> </ul> <p><b>RECORDS</b></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"> <li>• Identification of qualified individuals</li> <li>• Identification of covered tasks the individual is qualified to perform</li> <li>• Date(s) of current qualification</li> </ul> <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"> <li>• HES Respiratory Protection Training</li> </ul>
Exposure	<p>Personal Protective Equipment</p> <ul style="list-style-type: none"> <li>• HES Personal Protective Equipment</li> <li>• Emergency Response Guidebook: Purpose and Uses</li> <li>• Hazard Communication - Generic KW course</li> <li>• HES HAZCOM (face -2-face)</li> </ul>
MX6 Instrument	<ul style="list-style-type: none"> <li>• HES MX6 Gas Meter User Training</li> <li>• HES Operation and Maintenance of Monitoring Equipment</li> </ul>
Fit-Testing	<ul style="list-style-type: none"> <li>• HES Respirator Fit-Testing</li> </ul>
	HAZWOPER Awareness - Generic KW course

<p>HES Emergency Response Plan Review (SPCC, FRC, State Plan) This is face-2-face area specific training.</p>	<ul style="list-style-type: none"><li>• Emergency Response Guidebook: Purpose and Uses</li><li>• Hazard Communication - Generic KW course</li><li>• HES HAZCOM (face -2-face)</li><li>• PREP Emergency Response Plan Review</li></ul>
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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"> <li>• Carry out emergency procedures established under 195.402 that relate to their assignments;</li> <li>• 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;</li> <li>• 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;</li> <li>• 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</li> <li>• Learn the proper use of fire-fighting procedures and equipment, fire suits, and breathing apparatus by utilizing, where feasible, a simulated pipeline emergency condition.</li> </ul> <p>At intervals not exceeding 15 months, but at least once each calendar year, the Company shall:</p> <ul style="list-style-type: none"> <li>• Review with personnel their performance in meeting the objectives of the emergency response training program set forth in 195.403(a), and</li> <li>• Make appropriate changes to the emergency response training program as necessary to ensure that it is effective.</li> </ul> <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 facility</p>	<p>The Company has a written Operator Qualification program that includes provisions to:</p> <ul style="list-style-type: none"> <li>• Identify covered tasks;</li> <li>• Ensure through evaluation that individuals performing covered tasks are qualified;</li> <li>• 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;</li> <li>• 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;</li> <li>• Evaluate an individual if the operator has reason to believe that the individual is no longer qualified to perform a covered task;</li> <li>• Communicate changes that affect covered tasks to individuals performing these covered tasks; and</li> <li>• Identify those covered tasks and the intervals at which evaluation of the individual's qualifications is needed.</li> </ul> <p><b>RECORDS</b></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"> <li>• Identification of qualified individuals</li> <li>• Identification of covered tasks the individual is qualified to perform</li> <li>• Date(s) of current qualification</li> </ul> <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>

## 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**

<b>SPILL PREVENTION MEASURES</b>	<b>PERCENT REDUCTION ALLOWED</b>
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	75%

Note: \* - The tanks do not have tertiary containment

**The worst case discharge for each 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.

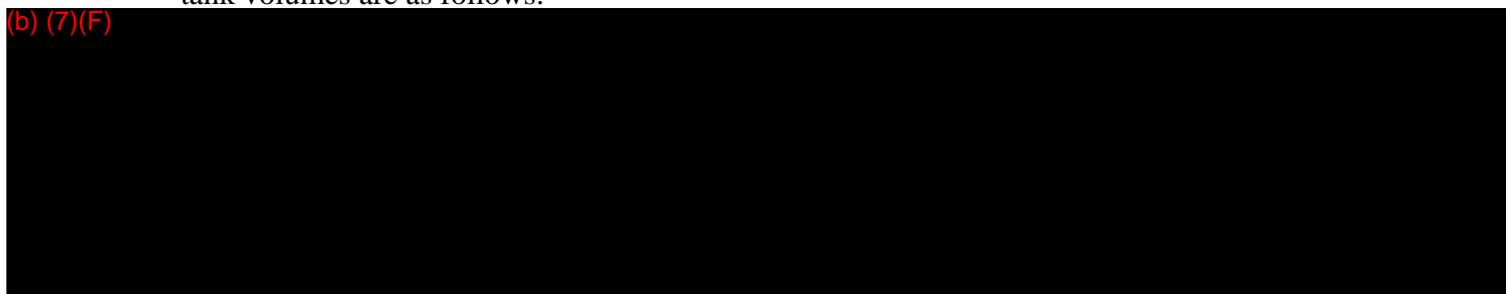
All of the breakout tanks in the pipeline system are within adequate secondary containment, therefore, the discharge volumes for the largest tank were determined by adjusting the total tank volume downward by 50% per the company guidelines.

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.

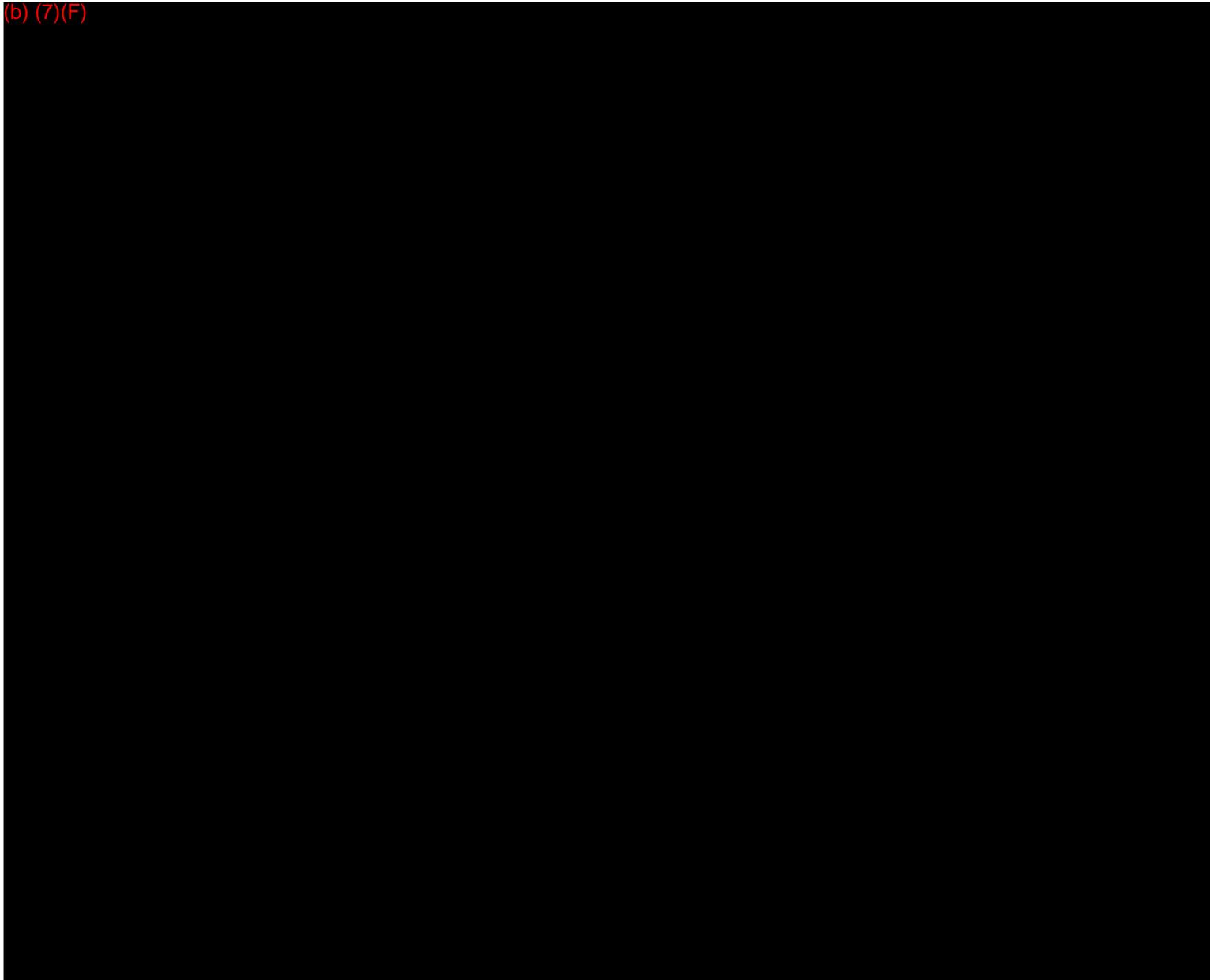
The maximum historic discharge is not applicable for WCD covered by this plan. Given below are the tank and pipeline WCD calculations for this plan.

The worst case discharge for each pipeline segment is the largest breakout tank. These tank volumes are as follows:

(b) (7)(F)



(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 Products

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.
<b>Health Hazard</b>	4 = Extremely Hazardous 3 = Hazardous 2 = Warning 1 = Slightly Hazardous 0 = No Unusual Hazard		<b>Fire Hazard (Flash Point)</b>		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	
<b>Special Hazard</b>	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		<b>Reactivity Hazard</b>		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 Pennsylvania System Overview Map, Montello Response Zone Area Map and multiple Pipeline Sensitivity Maps are presented in **APPENDIX E**.

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:

- HCA System Map Pennsylvania
- Montello Response Zone Area Map
- Northern Montello Area HCAs
- South Eastern Montello Area HCAs
- South Central Montello Area HCAs
- South Western Montello Area HCAs

## **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**

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

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

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

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

**APPENDIX B**  
**NOTIFICATION FORMS AND GUIDELINES**





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><b>If Onshore:</b></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><b>If Offshore:</b></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>



\*5. Material involved in Accident: *(select only one)*

- Carbon Steel  
 Material other than Carbon Steel ➡ Specify: \_\_\_\_\_

\*6. Type of Accident involved: *(select only one)*

- Mechanical Puncture ➡ Approx. size: /\_/\_/\_/\_/\_/\_/\_/\_/\_/\_/ in. (axial) by /\_/\_/\_/\_/\_/\_/\_/\_/\_/\_/ in. (circumferential)  
 Leak ➡ Select Type:     Pinhole         Crack         Connection Failure         Seal or Packing         Other

- Rupture ➡ Select Orientation:     Circumferential         Longitudinal         Other \_\_\_\_\_  
 Approx. size: /\_/\_/\_/\_/\_/\_/\_/\_/\_/\_/ in. (widest opening) by /\_/\_/\_/\_/\_/\_/\_/\_/\_/\_/ in. (length circumferentially or axially)

- Overfill or Overflow  
 Other ➡ Describe: \_\_\_\_\_



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 G – APPARENT CAUSE** *Select only one box from PART G in the shaded column on the left representing the APPARENT Cause of the Accident, and answer the questions on the right. Describe secondary, contributing, or root causes of the Accident in the narrative (PART H).*

**G1 - Corrosion Failure** – \*only one sub-cause can be picked from shaded left-hand column

**External Corrosion**

\*1. Results of visual examination:  
 Localized Pitting     General Corrosion  
 Other \_\_\_\_\_

\*2. Type of corrosion: *(select all that apply)*  
 Galvanic     Atmospheric     Stray Current     Microbiological     Selective Seam  
 Other \_\_\_\_\_

\*3. The type(s) of corrosion selected in Question 2 is based on the following: *(select all that apply)*  
 Field examination     Determined by metallurgical analysis  
 Other \_\_\_\_\_

\*4. Was the failed item buried under the ground?  
 Yes ⇨ \*4.a Was failed item considered to be under cathodic protection at the time of the Accident?  
      Yes ⇨ Year protection started:   /  /  /  /  /    
      No  
     \*4.b Was shielding, tenting, or disbonding of coating evident at the point of the Accident?  
          Yes     No  
     \*4.c Has one or more Cathodic Protection Survey been conducted at the point of the Accident?  
      Yes, CP Annual Survey ⇨ Most recent year conducted:   /  /  /  /  /    
      Yes, Close Interval Survey ⇨ Most recent year conducted:   /  /  /  /  /    
      Yes, Other CP Survey ⇨ Most recent year conducted:   /  /  /  /  /    
      No  
 No ⇨ 4.d Was the failed item externally coated or painted?     Yes     No

\*5. Was there observable damage to the coating or paint in the vicinity of the corrosion?  
 Yes     No

**Internal Corrosion**

\*6. Results of visual examination:  
 Localized Pitting     General Corrosion     Not cut open  
 Other \_\_\_\_\_

\*7. Cause of corrosion: *(select all that apply)*  
 Corrosive Commodity     Water drop-out/Acid     Microbiological     Erosion  
 Other \_\_\_\_\_

\*8. The cause(s) of corrosion selected in Question 7 is based on the following: *(select all that apply)*  
 Field examination     Determined by metallurgical analysis  
 Other \_\_\_\_\_

\*9. Location of corrosion: *(select all that apply)*  
 Low point in pipe     E bow     Other \_\_\_\_\_

\*10. Was the commodity treated with corrosion inhibitors or biocides?     Yes     No

11. Was the interior coated or lined with protective coating?     Yes     No

12. Were cleaning/dewatering pigs (or other operations) routinely utilized?  
 Not applicable - Not mainline pipe     Yes     No

13. Were corrosion coupons routinely utilized?  
 Not applicable - Not mainline pipe     Yes     No

**Complete the following if any Corrosion Failure sub-cause is selected AND the "Item Involved in Accident" (from PART C, Question 3) is Tank/Vessel.**

14. List the year of the most recent inspections:  
 14.a API Std 653 Out-of-Service Inspection      /  /  /  /  /       No Out-of-Service Inspection completed  
 14.b API Std 653 In-Service Inspection      /  /  /  /  /       No In-Service Inspection completed

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







**G6 - Equipment Failure** - \*only one **sub-cause** can be picked from shaded left-hand column

<input type="checkbox"/> <b>Malfunction of Control/Relief Equipment</b>	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"/> <b>Pump or Pump-related Equipment</b>	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"/> <b>Threaded Connection/Coupling Failure</b>	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"/> <b>Non-threaded Connection Failure</b>	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"/> <b>Defective or Loose Tubing or Fitting</b>	
<input type="checkbox"/> <b>Failure of Equipment Body (except Pump), Tank Plate, or other Material</b>	
<input type="checkbox"/> <b>Other Equipment Failure</b>	*5. Describe: _____ _____

**Complete the following if any Equipment Failure sub-cause is selected.**\*6. Additional factors that contributed to the equipment failure: *(select all that apply)*

- Excessive v bration
- Overpressurization
- No support or loss of support
- Manufacturing defect
- Loss of electricity
- Improper installation
- Mismatched items (different manufacturer for tubing and tubing fittings)
- Dissimilar metals
- Breakdown of soft goods due to compatibility issues with transported commodity
- Valve vault or valve can contributed to the release
- Alarm/status failure
- Misalignment
- Thermal stress
- Other \_\_\_\_\_

<b>G7 - Incorrect Operation</b> - *only one <b>sub-cause</b> can be picked from shaded left-hand column	
<input type="checkbox"/> <b>Damage by Operator or Operator's Contractor NOT Related to Excavation and NOT due to Motorized Vehicle/Equipment Damage</b>	
<input type="checkbox"/> <b>Tank, Vessel, or Sump/Separator Allowed or Caused to Overfill or Overflow</b>	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"/> <b>Valve Left or Placed in Wrong Position, but NOT Resulting in a Tank, Vessel, or Sump/Separator Overflow or Facility Overpressure</b>	
<input type="checkbox"/> <b>Pipeline or Equipment Overpressured</b>	
<input type="checkbox"/> <b>Equipment Not Installed Properly</b>	
<input type="checkbox"/> <b>Wrong Equipment Specified or Installed</b>	
<input type="checkbox"/> <b>Other Incorrect Operation</b>	*2. Describe: _____
<b>Complete the following if any Incorrect Operation sub-cause is selected.</b>	
*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	
<b>G8 – Other Accident Cause</b> - *only one <b>sub-cause</b> can be picked from shaded left-hand column	
<input type="checkbox"/> <b>Miscellaneous</b>	*1. Describe: _____ _____
<input type="checkbox"/> <b>Unknown</b>	*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>



# Pennsylvania

Oil			
When to Report	Notification Numbers	What to Report	Written Follow-Up Reports
<p><b>Immediately Report</b> any petroleum discharges of <b>5 gallons or more</b> into waters of the commonwealth or onto lands from which it might flow or drain into waters of the commonwealth (waters of the commonwealth include surface and underground water)</p> <p><b>***If possible, provide notification Within 2 Hours to known downstream water users who could be potentially affected. If this cannot be completed, request that the County Emergency Management Agency complete this task***</b></p>	<p>Pennsylvania Department of Environmental Protection - Regional Office:</p> <p><b>**See appendix for Regional Assignments, and Contact Info**</b></p> <p><b>***In the event that no contact with the regional office is made, the answering service in Harrisburg [(717) 787-5027; (800) 541-2050 Statewide] will receive calls 24 hours daily, including weekends and holidays</b></p>	<p><b>In the verbal notice, provide the following information:</b></p> <ol style="list-style-type: none"> <li>1)The regulated substance involved;</li> <li>2)The quantity of regulated substance involved;</li> <li>3)When and where the release occurred;</li> <li>4)The affected environmental media;</li> <li>5)Relevant, available information concerning impacts to water supplies, buildings, or to sewer or other utility lines;</li> <li>6)Interim remedial actions planned, initiated or completed</li> </ol>	<p><b>Within 15 days after the incident, a written report must be submitted to:</b></p> <ol style="list-style-type: none"> <li>1) The Operations Chief of the Water Quality Management Program at the appropriate regional office;</li> <li>2)Each municipality in which the reportable release occurred;</li> <li>3) Each municipality where the release has impacted environmental media or water supplies, buildings, or sewer or other utility lines.</li> </ol> <p><b>Address the items from the telephone notification in the written report.</b></p> <p>See Appendix for Mailing Addresses</p>
			<p>Pennsylvania Code: 25 PA\$91.33, 25 PA\$245.305</p>

# Pennsylvania

**Tank Leaks (the following does NOT apply to pipeline tanks)**

When to Report	Notification Numbers	What to Report	Written Follow-Up Reports	Mailing Address for Follow-Up Reports	Citation
<p>A reportable release is a quantity (or unknown quantity) of a regulated substance released to or posing an immediate threat to surface water, groundwater, bedrock, soil, or sediment.</p> <p><u>The following 2 scenarios are exceptions to a reportable release:</u></p> <p>#1 &gt;25 gallons of petroleum to an aboveground surface: If the owner or operator has control over the release, the release is contained, and within 24 hours the total volume of the release is recovered or removed.</p> <p>#2 A release to the interstitial space of a double-walled AST or UST: If the owner or operator has control over the release, the release is contained, and within 24 hours the total volume of the release is recovered or removed.</p> <p><u>Report Immediately but Within 2 Hours</u> any reportable tank release as defined above</p> <p>***If possible, provide notification <u>Within 2 Hours</u> to known downstream water users who could be potentially affected. If this cannot be completed, request that the County Emergency Management Agency complete this task.***</p>	<p>Local Fire Authority (if fire, explosion, or safety hazards exist at the site)</p> <p>Pennsylvania Department of Environmental Protection - Regional Office:</p> <p>**See appendix for Regional Assignments, and Contact Info**</p> <p>***In the event that no contact with the regional office is made, the answering service in Harrisburg [(717) 787-5027; (800) 541-2050 Statewide] will receive calls 24 hours daily, including weekends and holidays</p>	<p>In the verbal notice, provide the following information:</p> <ol style="list-style-type: none"> <li>1) The regulated substance involved;</li> <li>2) The quantity of the regulated substance involved;</li> <li>3) When and where the release occurred;</li> <li>4) The extent of contamination of surface water, groundwater, soil, or sediment</li> <li>5) Interim remedial actions planned, initiated, or completed</li> </ol>	<p><b>Within 15 days after the incident,</b> a written report must be submitted to:</p> <ol style="list-style-type: none"> <li>1) The Operations Chief of the Water Quality Management Program at the appropriate regional office;</li> <li>2) Each municipality in which the reportable release occurred;</li> <li>3) Each municipality where the release has impacted environmental media or water supplies, buildings, or sewer or other utility lines.</li> </ol> <p><b>Address the items from the telephone notification in the written report.</b></p>	<p>See appendix for PADEP Regional Assignments, and Contact Info</p> <p><b>Pennsylvania Emergency Management Agency (PEMA)</b> 2605 Interstate Drive Harrisburg, PA 17110-9364</p>	<p>Pennsylvania Code: 25 PA§245.305</p>
<p><b>Immediately Report Any Reportable Releases from Storage Tank Facilities Storing &gt;21,000 Gallons of Regulated Substances</b></p>	<p>In addition to contacting the local fire authority and appropriate regional office listed above, also contact:</p> <p><b>County Emergency Management Agency</b> -Pennsylvania Emergency Management Agency (PEMA) (717) 651-2001</p>				

# Pennsylvania

Facility-Specific Requirements - Icedale Pump Station & Storage Facility					
When to Report	Notification Numbers	What to Report	Written Follow-Up Reports	Mailing Address for Follow-Up Reports	Citation
<p><b><u>Immediately Report</u></b> any release of <b><u>gasoline</u></b> that is not under control, not completely contained, and not completely recovered or removed, <b><u>within 2 hours after the confirmation of a reportable release.</u></b></p> <p>A release is defined as, but not limited to:</p> <p>(1) More than twenty-five (25) gallons to a contaminated area, structure or facility around an above ground storage tank, or</p> <p>(2) More than five (5) gallons to a synthetic surface, such as asphalt or concrete.</p> <p>(3) A release of more than one (1) gallon to surface soils.</p>	<p>Pennsylvania Department of Environmental Protection - Regional Office:</p> <p>Region I (Southeast PA): (484) 250-5900</p>	<p>The report shall describe, to the extent information is available:</p> <p>(1) the quantity of substance involved,</p> <p>(2) date and time the release occurred,</p> <p>(3) interim remedial action planned, initiated, and/or completed.</p>	<p>A written report may be REQUESTED or REQUIRED by the PADEP. Call the notification numbers to inquire if a written follow-up report is required and if so, the content of the report and mailing address.</p>	<p>PADEP Southeast Regional Office Regional Air Program Manager 2 East Main Street Norristown, PA 19401</p>	<p>Icedale Pump Station Synthetic Minor Permit #15-00046 Section C, Requirement #018</p>
Facility-Specific Requirements - Malvern Terminal					
When to Report	Notification Numbers	What to Report	Written Follow-Up Reports	Mailing Address for Follow-Up Reports	Citation
<p><b><u>Immediately Report</u></b> any release of <b><u>gasoline</u></b> that is not under control, not completely contained, and not completely recovered or removed, <b><u>within 2 hours after the confirmation of a reportable release.</u></b></p> <p>A release is defined as, but not limited to:</p> <p>a) More than twenty-five (25) gallons to a contaminated area, structure or facility around an above ground storage tank, or</p> <p>b) More than five (5) gallons to a synthetic surface, such as asphalt or concrete.</p>	<p>Pennsylvania Department of Environmental Protection - Regional Office:</p> <p>Region I (Southeast PA): (484) 250-5900</p>	<p>The report shall describe, to the extent information is available:</p> <p>(1) the quantity of substance involved,</p> <p>(2) date and time the release occurred,</p> <p>(3) interim remedial action planned, initiated, and/or completed.</p>	<p>A written report may be REQUESTED or REQUIRED by the PADEP. Call the notification numbers to inquire if a written follow-up report is required and if so, the content of the report and mailing address.</p>	<p>PADEP Southeast Regional Office Regional Air Program Manager 2 East Main Street Norristown, PA 19401</p>	<p>Malvern TVOP 15-00043: Section C IV. Recordkeeping Requirements (condition #017) (PA code 127.441 Section C V. Reporting Requirements (condition # 024) (25 PA code 127.441)</p>

# Pennsylvania

Facility-Specific Requirements - Marcus Hook #2 Tank Farm					
When to Report	Notification Numbers	What to Report	Written Follow-Up Reports	Mailing Address for Follow-Up Reports	Citation
<p><b><u>Immediately Report</u></b> any release of <b><u>gasoline</u></b> that is not under control, not completely contained, and not completely recovered or removed, <b><u>within 2 hours after the confirmation of a reportable release.</u></b></p> <p>A release is defined as, but not limited to:</p> <ol style="list-style-type: none"> <li>(1) More than twenty-five (25) gallons to a contaminated area, structure or facility around an above ground storage tank, or</li> <li>(2) More than five (5) gallons to a synthetic surface, such as asphalt or concrete.</li> <li>(3) A release of more than one (1) gallon to surface soils.</li> </ol>	<p>Pennsylvania Department of Environmental Protection - Regional Office:                      Region I (Southeast PA):                      (484) 250-5900</p>	<p>The report shall describe, to the extent information is available:</p> <ol style="list-style-type: none"> <li>(1) the quantity of substance involved,</li> <li>(2) date and time the release occurred,</li> <li>(3) interim remedial action planned, initiated, and/or completed.</li> </ol>	<p>A written report may be <b>REQUIRED</b> or <b>REQUIRED</b> by the PADEP. Call the notification numbers to inquire if a written follow-up report is required and if so, the content of the report and mailing address.</p>	<p>PADEP                      Southeast Regional Office                      Regional Air Program Manager                      2 East Main Street                      Norristown, PA 19401</p>	<p>MHTF Title V Permit #23-00044                      Section C, Requirement #010                      MHTF Title V Permit #23-00044                      Section C, Requirement #014</p>
Facility-Specific Requirements - Twin Oaks Terminal					
When to Report	Notification Numbers	What to Report	Written Follow-Up Reports	Mailing Address for Follow-Up Reports	Citation
<p><b><u>Immediately Report</u></b> any release of <b><u>gasoline</u></b> that is not under control, not completely contained, and not completely recovered or removed, <b><u>within 2 hours after the confirmation of a reportable release.</u></b></p> <p>A release is defined as, but not limited to:</p> <ol style="list-style-type: none"> <li>a) More than twenty-five (25) gallons to a contaminated area, structure or facility around an above ground storage tank, or</li> <li>b) More than five (5) gallons to a synthetic surface, such as asphalt or concrete.</li> </ol>	<p>Pennsylvania Department of Environmental Protection - Regional Office:                      Region I (Southeast PA):                      (484) 250-5900</p>	<p>The report shall describe, to the extent information is available:</p> <ol style="list-style-type: none"> <li>(1) the quantity of substance involved,</li> <li>(2) date and time the release occurred,</li> <li>(3) interim remedial action planned, initiated, and/or completed.</li> </ol>	<p>A written report may be <b>REQUIRED</b> or <b>REQUIRED</b> by the PADEP. Call the notification numbers to inquire if a written follow-up report is required and if so, the content of the report and mailing address.</p>	<p>PADEP                      Southeast Regional Office                      Regional Air Program Manager                      2 East Main Street                      Norristown, PA 19401</p>	<p>Twin Oaks TVOP 23-00045                      Section C IV.                      Recordkeeping Requirements (condition #013) (PA code 127.441                      Section C V. Reporting Requirements (condition # 018) (25 PA code 127.441)</p>

# Pennsylvania

## Hazardous Waste

When to Report	Notification Numbers	What to Report	Written Follow-Up Reports	Citation
<p><b>Immediately Report</b> any releases that could threaten human health or the environment outside the facility, or when the release has reached surface water, or when the amount spilled or discharged exceeds the federal RQ or 10 gallons (whichever is less)</p>	<p style="text-align: center;"><b>Pennsylvania Department of Environmental Protection</b> (800) 541-2050  (See regional contact numbers in appendix)</p>	<p>The verbal notice shall include the following:                      1) The name of the person reporting the spill;                      2) The name and EPA ID number of the generator;                      3) The telephone number where the person reporting the spill can be reached;                      4) The date, time, and location of the spill;                      5) A brief description of the incident;                      6) For each material involved in the spill, report the shipping name, hazard class and U.N. number, and the estimated quantity of material spilled;                      7) The extent of contamination of land, water, or air, if known.</p>	<p><b>Within 15 days after the incident</b>, a written report must be submitted to the PADEP by the generator. The written report should be titled "Hazardous Waste Spill Report," and provide the following information:                      1) Name, address, EPA ID number of generator, and the date, time and location of incident;                      2) Brief description of the circumstances causing the incident;                      3) Description of each of the wastes spilled or discharged in the incident, and the estimated quantity spills or discharged (by weight or volume);                      4) A legible copy of the manifest document, if applicable;                      5) Description of a contamination of land, water, or air that has occurred due to the incident;                      6) Description of the actions the generator intends to take to prevent future occurrences.</p> <p style="text-align: center;">See Appendix for Mailing Addresses</p>	<p>Pennsylvania Code: 25 PA§262a.10, incorporating requirements of 40 CFR Part 262; 25 PA§262a.43</p>

COMMONWEALTH OF PENNSYLVANIA  
DEPARTMENT OF ENVIRONMENTAL PROTECTION

2550-FM-BWM0082 12/2005  
BUREAU OF WASTE MANAGEMENT

**NOTIFICATION OF REPORTABLE RELEASE (Owners and Operators)**

Initial  
 Follow-Up

**NOTIFICATION OF CONTAMINATION (Certified Installers and Inspectors)**

**NOTIFICATION OF REPORTABLE RELEASE (Owners and Operators)**

The Storage Tank Program's Corrective Action Process (CAP) regulations establish release reporting requirements for owners and operators of storage tanks and storage tank facilities.

Subsection 245.305(a) of the regulations requires owners or operators to notify the appropriate regional office of the Department as soon as practicable, but no later than 24 hours, after the confirmation of a reportable release.

Subsection 245.305(d) requires owners or operators to provide an initial written notification to the Department, each municipality in which the reportable release occurred, and each municipality where that release has impacted environmental media or water supplies, buildings, or sewer or other utility lines, within 15 days of the notice required by Subsection 245.305(a).

Subsection 245.305(e) requires owners or operators to provide follow-up written notification to the Department and to each impacted municipality of new impacts to environmental media or water supplies, buildings, or sewer or other utility lines discovered after the initial written notification required by subsection 245.305(d). Written notification is to be made within 15 days of the discovery of the new impact.

This form may be used to comply with Subsection 245.305(d) and (e).

**OWNERS AND OPERATORS (O/O)**

INDICATE IF THIS IS AN INITIAL OR FOLLOW-UP NOTIFICATION BY MARKING THE APPROPRIATE BOX FOUND IN THE TOP RIGHT-HAND CORNER OF THIS FORM. PLEASE COMPLETE ALL INFORMATION IN SECTIONS I, II, IIIA, IIIB, IV, V, VII and VIII.

**NOTIFICATION OF CONTAMINATION (Certified Installers and Inspectors)**

The Storage Tank Program's Certification regulations establish standards of performance for certified installers and inspectors of storage tanks and storage tank facilities.

Subsection 245.132(a)(4) of the regulations requires certified installers and inspectors to report to the Department a release of a regulated substance or confirmed or suspected contamination of soil, surface or groundwater from regulated substances observed while performing services as a certified installer or inspector.

This form may be used to comply with Subsection 245.132(a)(4). Subsection 245.132(a)(4) requires submission of the form within 48 hours of observing suspected or confirmed contamination. Where there is a reportable release, the form may be submitted jointly by the owner, operator, certified installer and certified inspector. In this instance, the form must be received by the appropriate regional office within 15 days of the notice required by Subsection 245.305(a).

**CERTIFIED INSTALLERS AND INSPECTORS (I/I)**

PLEASE COMPLETE ALL INFORMATION IN SECTIONS I, II, IIIA, IIIC, VI, VII and VIII.

**INSTRUCTIONS**

- I. **FACILITY INFORMATION** - Record the name, I.D. number and physical location (not P.O. Box) of the facility at which a reportable release has been confirmed or at which suspected or confirmed contamination has been observed. Include the name and phone number of a person to contact at the facility.
- II. **OWNER/OPERATOR INFORMATION** - Record the name, business address and phone number of the owner of the facility identified in Section I. Also, record the name and phone number of the operator of the facility.
- III. **REGULATED SUBSTANCE INFORMATION** - Indicate to the best of your knowledge: A) the type of product or products involved; B) the quantity of product or products released; and C) whether the contamination is suspected or confirmed.
- IV. **REPORTABLE RELEASE INFORMATION** - Record the date of confirmation of the reportable release, e.g., "9/18/01"; the date and regional office notified; and the date the local municipality(ies) [provide name of municipality(ies)] was/were sent a copy of this form. Indicate to the best of your knowledge the source/cause of the release, how the release was discovered and the environmental media affected and impacts.
- V. **INTERIM REMEDIAL ACTIONS** - Indicate the interim remedial actions planned, initiated or completed.
- VI. **SUSPECTED/CONFIRMED CONTAMINATION INFORMATION** - Record the date of observation of the suspected or confirmed contamination, e.g., "11/24/01". Indicate to the best of your knowledge the indications of a suspected release or extent of confirmed contamination resulting from the release of the regulated substance.
- VII. **ADDITIONAL INFORMATION** - Provide any additional, relevant, available information concerning the reportable release or suspected or confirmed contamination. Include in this section specific details or problems about the release. For example, if the piping was the source of the release and the cause was corrosion of a metal connector or flexible connector, it is important to include that information here. Use additional 8½" x 11" sheets of paper, if necessary.
- VIII. **CERTIFICATION** - Please print your name, and provide your signature and date of signature. If a certified installer/inspector, provide certification number and company certification number.
- IX. **ATTACHMENT** - If a certified installer/inspector, provide a copy of failed valid tightness test(s), if applicable.

**PLEASE SEND COMPLETED ORIGINAL FORM TO:**

PA Department of Environmental Protection  
Environmental Cleanup Program  
Storage Tank Section  
(and the appropriate address below,  
depending on where the FACILITY is located)

<p>Southwest Region 2 East Main Street Norristown, PA 19401 PHONE: 484-250-5900 FAX: 484-250-5943</p> <p><b>Counties</b> Bucks, Chester, Delaware, Montgomery, Philadelphia</p>	<p>Northeast Region 2 Public Square Wilkes-Barre, PA 18711-0790 PHONE: 570-826-2511 FAX: 570-820-4907</p> <p><b>Counties</b> Carbon, Lackawanna, Lehigh, Luzerne, Monroe, Northampton, Pike, Schuylkill, Susquehanna, Wayne, Wyoming</p>	<p>Southcentral Region 909 Elmerton Avenue Harrisburg, PA 17110 PHONE: 677-333-1904 FAX: 717-705-4830</p> <p><b>Counties</b> Adams, Bedford, Berks, Blair, Cumberland, Dauphin, Franklin, Fulton, Huntingdon, Juniata, Lancaster, Lebanon, Mifflin, Perry, York</p>	<p>Northcentral Region 208 W Third Street, Suite 101 Williamsport, PA 17701 PHONE: 570-321-6525/327-3696 FAX: 570-327-3420</p> <p><b>Counties</b> Bradford, Cameron, Centre, Clinton, Clearfield, Columbia, Lycoming, Montour, Northumberland, Potter, Snyder, Sullivan, Tioga, Union</p>	<p>Southwest Region 400 Waterfront Drive Pittsburgh, PA 15222 PHONE: 412-442-4091/4000 FAX: 412-442-4328</p> <p><b>Counties</b> Allegheny, Armstrong, Beaver, Cambria, Fayette, Greene, Indiana, Somerset, Washington, Westmoreland</p>	<p>Northwest Region 230 Chestnut Street Meadville, PA 16335-3481 PHONE: 814-332-6945 800-373-3398 FAX: 814-332-6121</p> <p><b>Counties</b> Butler, Clarion, Crawford, Elk, Erie, Forest, Jefferson, Lawrence, McKean, Mercer, Venango, Warren</p>
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2550-FM-BWM0082 10/2005

FACILITY I.D. NUMBER \_\_\_\_\_

**VIII. CERTIFICATION (Both O/O and I/I)**

I, \_\_\_\_\_ hereby certify, under penalty of law as provided in 18 Pa.  
(Print Name)

C.S.A. §4904 (relating to unsworn falsification to authorities) that I am the owner or operator of the above referenced storage tank facility and that the information provided by me in this notification is true, accurate and complete to the best of my knowledge and belief.

\_\_\_\_\_  
Signature of Owner or Operator

\_\_\_\_\_/\_\_\_\_\_/\_\_\_\_\_  
Date

I, \_\_\_\_\_ hereby certify, under penalty of law as provided in 18 Pa.  
(Print Name)

C.S.A. §4904 (relating to unsworn falsification to authorities) that I am the certified installer who performed tank handling activities at the above referenced storage tank facility and that the information provided by me in this notification is true, accurate and complete to the best of my knowledge and belief.

\_\_\_\_\_  
Signature of Certified Installer

\_\_\_\_\_/\_\_\_\_\_/\_\_\_\_\_  
Date

\_\_\_\_\_  
Installer Certification Number

\_\_\_\_\_  
Company Certification Number

I, \_\_\_\_\_ hereby certify, under penalty of law as provided in 18 Pa.  
(Print Name)

C.S.A. §4904 (relating to unsworn falsification to authorities) that I am the certified inspector who performed inspection activities at the above referenced storage tank facility and that the information provided by me in this notification is true, accurate and complete to the best of my knowledge and belief.

\_\_\_\_\_  
Signature of Certified Inspector

\_\_\_\_\_/\_\_\_\_\_/\_\_\_\_\_  
Date

\_\_\_\_\_  
Inspector Certification Number

\_\_\_\_\_  
Company Certification Number

# PENNSYLVANIA DEPARTMENT OF ENVIRONMENTAL PROTECTION

## REGIONAL OFFICES

### Region VI

#### Northwest

230 Chestnut Street  
 Meadville, PA 16335-3481  
 (814) 332-6945  
 (800) 373-3398 (After Hours)

### Region IV

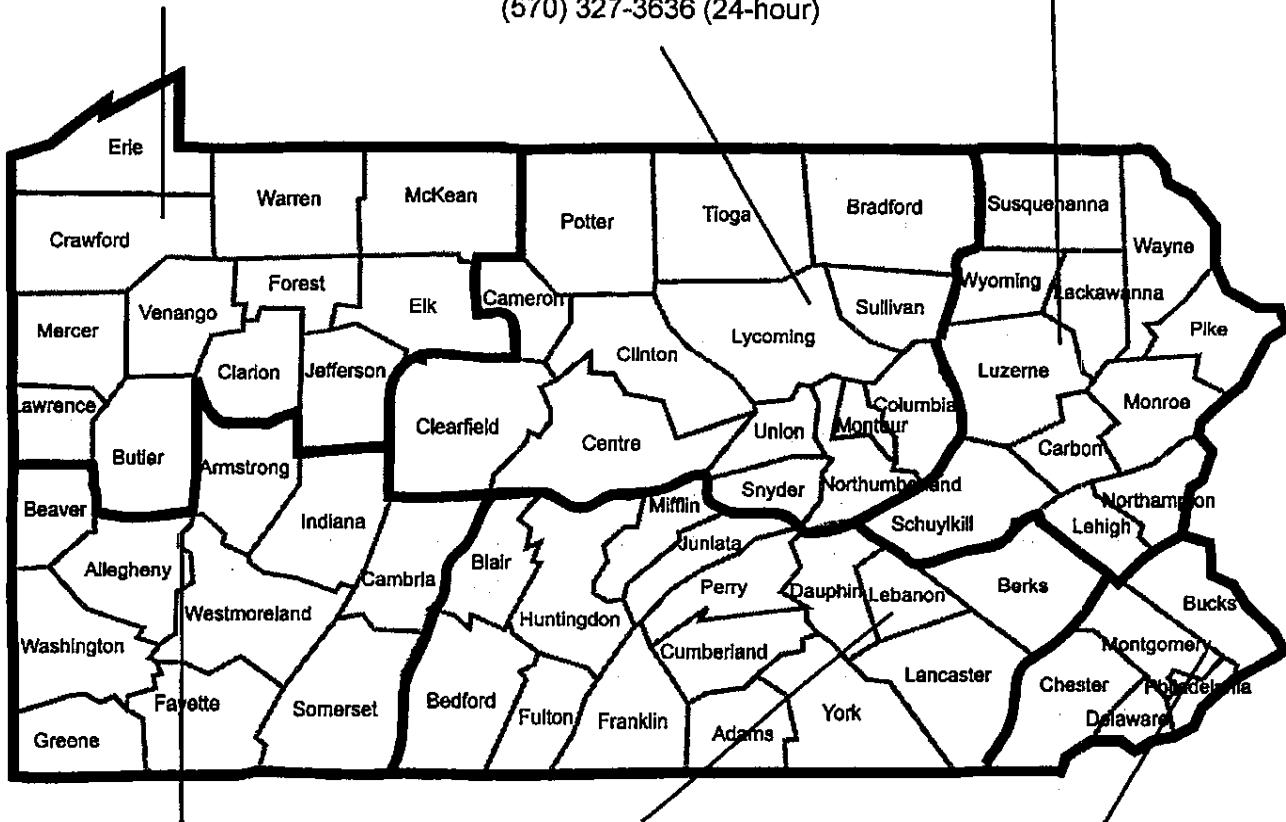
#### Northcentral

208 West 3rd Street  
 Suite 101  
 Williamsport, PA 17701-6448  
 (570) 327-3695 (Work Hours)  
 (570) 327-3636 (24-hour)

### Region II

#### Northeast

2 Public Square  
 Wilkes-Barre, PA 18711-0790  
 (570) 826-2511 (24-hour)



### Region V

#### Southwest

400 Waterfront Drive  
 Pittsburgh, PA 15222-4745  
 (412) 442-4000 (24-hour)

### Region III

#### Southcentral

909 Elmerton Avenue  
 Harrisburg, PA 17110  
 (717) 705-4704 (Work Hours)  
 (877) 333-1904 (24-hour)

### Region I

#### Southeast

2 East Main Street  
 Norristown, PA 19401  
 (484) 250-5900

### Notes:

1. In the event no contact with the regional office is made, the answering service in Harrisburg will receive calls 24 hours a day, including weekends and holidays. Telephone (800) 541-2050 (in-state) or (717) 787-5027.
2. The Northwest and Southcentral Regions' telephone numbers may be recordings that direct the spill reporter to other numbers. Be ready to write down numbers prior to calling.

**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

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

COTP/ACC Name: BALTIMORE  
Operating Area: River Canal

Facility

**Classification Level: MIMP1**

	Facility			Totals			Vessel			
	Own	COAM	Actual	Adjust #1	Final	Own	COAM	Actual	Adjust #1	Totals
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

**Classification Level: WCD1**

	Facility			Totals			Vessel			
	Own	COAM	Actual	Adjust #1	Final	Own	COAM	Actual	Adjust #1	Totals
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

**Classification Level: WCD2**

	Facility			Totals			Vessel			
	Own	COAM	Actual	Adjust #1	Final	Own	COAM	Actual	Adjust #1	Totals
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

**Classification Level: WCD3**

	Facility			Totals			Vessel			
	Own	COAM	Actual	Adjust #1	Final	Own	COAM	Actual	Adjust #1	Totals
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

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

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

Facility Vessel

**Classification Level: MMPD**

	Facility			Totals			Vessel			
	Own	COAM	Actual	Adjust #1	Final	Own	COAM	Actual	Adjust #1	Final
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

**Classification Level: WCD1**

	Facility			Totals			Vessel			
	Own	COAM	Actual	Adjust #1	Final	Own	COAM	Actual	Adjust #1	Final
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

**Classification Level: WCD2**

	Facility			Totals			Vessel			
	Own	COAM	Actual	Adjust #1	Final	Own	COAM	Actual	Adjust #1	Final
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

**Classification Level: WCD3**

	Facility			Totals			Vessel			
	Own	COAM	Actual	Adjust #1	Final	Own	COAM	Actual	Adjust #1	Final
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

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

COTP/ACC Name: PHILADELPHIA  
Operating Area: River Canal

Facility

**Classification Level: MMPD**

	Facility			Totals			Vessel			
	Own	COAM	Actual	Adjust #1	Final	Own	COAM	Actual	Adjust #1	Final
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
<b>Totals</b>										

**Classification Level: WCD1**

	Facility			Totals			Vessel			
	Own	COAM	Actual	Adjust #1	Final	Own	COAM	Actual	Adjust #1	Final
Available P 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
<b>Totals</b>										

**Classification Level: WCD2**

	Facility			Totals			Vessel			
	Own	COAM	Actual	Adjust #1	Final	Own	COAM	Actual	Adjust #1	Final
Available P 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
<b>Totals</b>										

**Classification Level: WCD3**

	Facility			Totals			Vessel			
	Own	COAM	Actual	Adjust #1	Final	Own	COAM	Actual	Adjust #1	Final
Available P 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
<b>Totals</b>										

The amounts displayed under Actual 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

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

COTP/ACC Name: BALTIMORE  
Operating Area: Inland

Facility

Vessel

**Classification Level: MIMP1**

	Facility			Totals			Vessel			Totals	
	Own	COAM	Actual	Adjust #1	Final	Own	COAM	Actual	Adjust #1	Final	Final
Available Protective Boom (ft)	10,900	41,000	51,900	48,200	48,200	10,900	41,000	51,900	48,200	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	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	4,248
TSC (bbbls)	6,854	1,642	8,496	8,496	8,496	6,854	1,642	8,496	8,496	8,496	8,496

**Classification Level: WCD1**

	Facility			Totals			Vessel			Totals	
	Own	COAM	Actual	Adjust #1	Final	Own	COAM	Actual	Adjust #1	Final	Final
Available Protective Boom (ft)	10,900	41,000	51,900	48,200	48,200	10,900	41,000	51,900	48,200	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	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	4,248
TSC (bbbls)	6,854	1,642	8,496	8,496	8,496	6,854	1,642	8,496	8,496	8,496	8,496

**Classification Level: WCD2**

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

**Classification Level: WCD3**

	Facility			Totals			Vessel			Totals	
	Own	COAM	Actual	Adjust #1	Final	Own	COAM	Actual	Adjust #1	Final	Final
Available Protective Boom (ft)	10,900	51,000	61,900	52,500	52,500	10,900	51,000	61,900	52,500	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	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	12,261
TSC (bbbls)	11,587	12,935	24,522	24,522	24,522	11,587	12,935	24,522	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

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

COTP/ACC Name: NEW YORK  
Operating Area: Inland

Facility Vessel

**Classification Level: MIMP1**

	Facility			Totals			Vessel			
	Own	COAM	Actual	Adjust #1	Final	Own	COAM	Actual	Adjust #1	Final
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
<b>Totals</b>										

**Classification Level: WCD1**

	Facility			Totals			Vessel			
	Own	COAM	Actual	Adjust #1	Final	Own	COAM	Actual	Adjust #1	Final
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
<b>Totals</b>										

**Classification Level: WCD2**

	Facility			Totals			Vessel			
	Own	COAM	Actual	Adjust #1	Final	Own	COAM	Actual	Adjust #1	Final
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
<b>Totals</b>										

**Classification Level: WCD3**

	Facility			Totals			Vessel			
	Own	COAM	Actual	Adjust #1	Final	Own	COAM	Actual	Adjust #1	Final
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
<b>Totals</b>										

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

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

COT/ACC Name: PHILADELPHIA  
Operating Area: Inland

**Classification Level: MMPD**

	Facility				Vessel					
	Own	COAM	Actual	Adjust #1	Totals	Own	COAM	Actual	Adjust #1	Totals
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 (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

**Classification Level: WCD1**

	Facility				Vessel					
	Own	COAM	Actual	Adjust #1	Totals	Own	COAM	Actual	Adjust #1	Totals
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 (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

**Classification Level: WCD2**

	Facility				Vessel					
	Own	COAM	Actual	Adjust #1	Totals	Own	COAM	Actual	Adjust #1	Totals
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

**Classification Level: WCD3**

	Facility				Vessel					
	Own	COAM	Actual	Adjust #1	Totals	Own	COAM	Actual	Adjust #1	Totals
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 FSC 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 2011.*



\_\_\_\_\_  
*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>	<b>CG-Government Initiated UNANNOUNCED Oil Spill Response Drill</b>	<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*

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: O<sub>2</sub>, H<sub>2</sub>S, NO<sub>2</sub> and SO<sub>2</sub>

#### **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

APPENDIX E  
RESPONSE ZONE MAPS











