



U.S. Department
of Transportation

**Pipeline and Hazardous
Materials Safety Administration**

1200 New Jersey Avenue, S.E.
Washington, D.C. 20590

The following Oil Spill Response Plan has been submitted to the Department of Transportation (DOT) Pipeline Hazardous Materials Safety Administration (PHMSA) in HyperText Markup Language (HTML) format, and has since been converted to Portable Document Format (PDF) form. Any hyperlink included in the PDF file is NOT functional, and materials referenced in the links have been attached as an addendum at the end of the document.





Brownsville Terminal Complex
Integrated Contingency Plan (ICP) /
Facility Response Plan (FRP)

Developed by:



Response Procedures Flow Chart

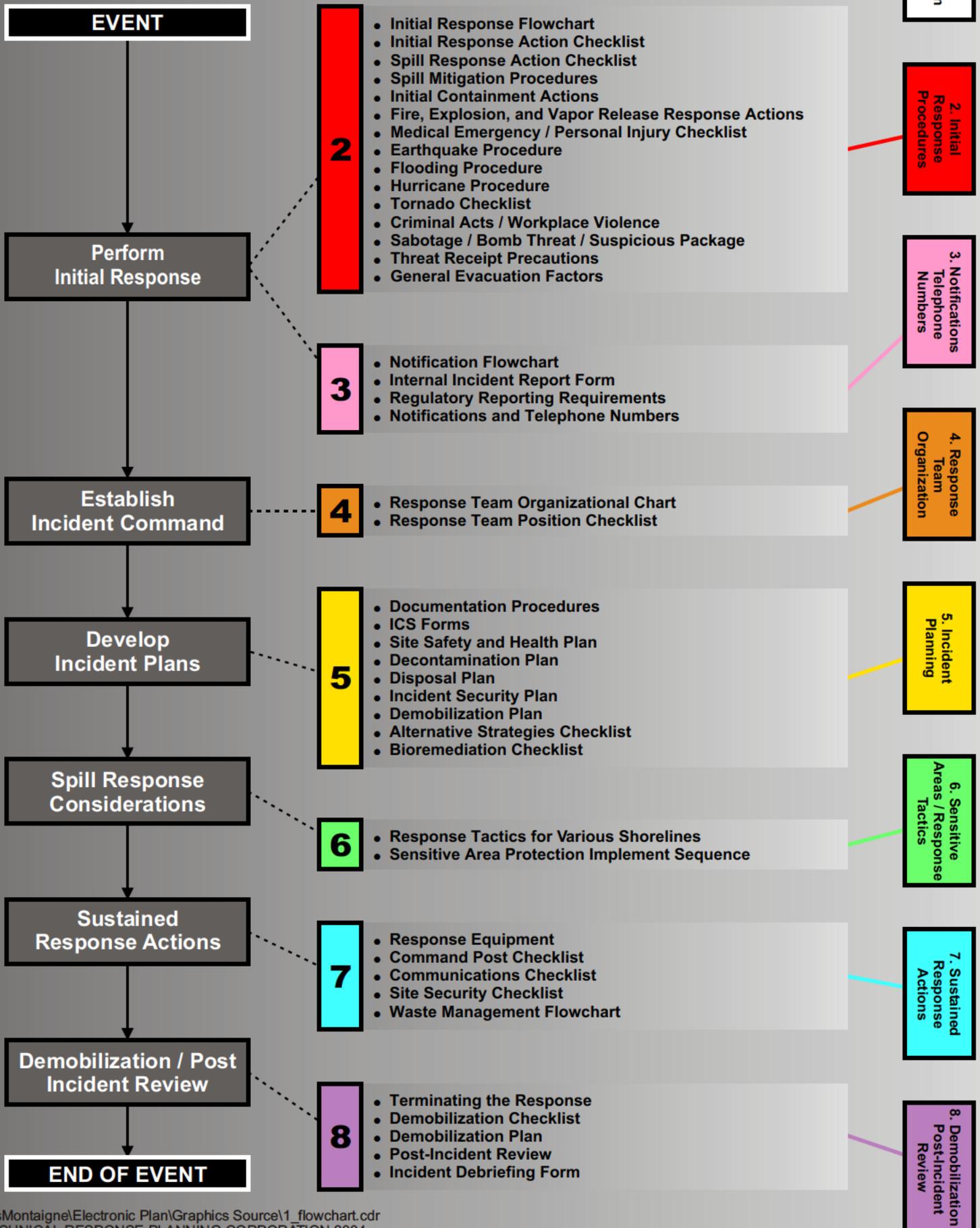


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SECTION 1

INTRODUCTION

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1.2 Plan Review and Update Procedure

1.3 Certification of Adequate Resources

1.4 Agency Submittal / Approval Letters

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FIGURE 1-1 - RECORD OF CHANGES

Changes to this Plan will be documented on this page. Plan review and modifications will be initiated and coordinated by the Environmental, Safety, and Occupational Health Department (ESOH).

CHANGE NUMBER	DATE OF CHANGE	DESCRIPTION OF CHANGE
0	1/20/2005	New Issue- Conversion of existing ICP to web-based ICP format (intitial submission)
1	2/3/2005	Updated M. Helmke's address (Figure 1-3, Section 1, ERAP & ICP)
2	8/31/2005	Added USCG approval letter. Updated USCG FRP Control Number (Section 1, Fig. 1-3; ERAP & ICP)
3	1/30/2006	Annual plan review - see revisions noted below.
3	1/30/2006	Added information regarding applicable ACP's (Section 1, ERAP & ICP); added addresses for listed OSRO's (Section 7 & Appendix B)
3	1/30/2006	Specified QI authority to activate & contract with OSRO's (Section 4, ERAP & ICP)
4	7/28/2006	Specified 5-year review period (from date of last DOT/RSPA approval). Specified "change in emergency response procedures" as condition requiring revision/submission for DOT/RSPA purposes. [Section 1.2, ERAP & ICP]
4	7/28/2006	Minor corrections/additions to "Spill Detection" discussion. [Appendix D, D.1.1]
5	1/30/2007	Annual plan review - no revisions necessary at time.
6	1/30/2008	Annual plan review - no revisions necessary at time. See revisions noted below (through remainder of year).
7	3/24/2008	Misc. updates to external contacts information [Figure 3.4-1, ERAP & ICP]; Updates to tankage contents [Apps. D & E].
8	10/6/2008	Added language identifying response resources for fighting vegetable oil fires (Figure 1-3; ERAP & ICP).
9	1/30/2009	Annual plan review - no revisions necessary at time. See revisions noted below (through remainder of year).
10	9/28/2009	Added contract/equipment data for new response contractor- CRRC [Appendix B].
11	1/20/2010	Annual plan review - see revisions noted below.
11	1/20/2010	Personnel updates (replaced Helmke w/Leubke) [Figs.

		1-3, 3.4-1; ERAP & ICP]
11	1/20/2010	Updated tankage tables to reflect addition of Tk 1019 [Apps. D & E]
11	1/20/2010	Updated facility diagrams to reflect tankage additions, etc. [Figs. 1-6, 2.6-2, & Drainage]
12	8/17/2010	Personnel updates (added Lubbers); updated Storage Tank Information [Figs. 1-3 & 3.4-1, ERAP & ICP; Apps D & E, ICP]
13	11/15/2010	Five-year resubmittal to USCG [all changes since initial submittal]

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FIGURE 1-1 - RECORD OF CHANGES

Changes to this Plan will be documented on this page. Plan review and modifications will be initiated and coordinated by the Environmental, Safety, and Occupational Health Department (ESOH).

CHANGE NUMBER	DATE OF CHANGE	DESCRIPTION OF CHANGE
14	2/3/2011	Annual plan review. Added aerial surveillance resources to external contacts information [Figure 3.4-1, ERAP & ICP]
15	7/20/2011	Numerous (minor) updates/additions/corrections, in response to USCG review-letter of 4/21/11:
15	7/20/2011	Added "simultaneous vessel transfer" info. to facility description [Fig. 1-3, ERAP & ICP]
15	7/20/2011	Modified external contacts listing to show Miller Environmental under "Other Service Providers" [Fig. 3.4-1, ERAP & ICP]
15	7/20/2011	Enhanced listing of QI responsibilities [Sect. 4, ERAP & ICP]
15	7/20/2011	Enhanced location description for facility response supplies; removed Miller Environmental from OSRO listing [Sect.5, ERAP]
15	7/20/2011	Enhanced location description for facility response supplies; removed Miller Environmental from OSRO listing [Sect. 7, ICP]
15	7/20/2011	Removed Miller Environmental from OSRO listing [App. B, ICP]
15	7/20/2011	Corrected MMPD calculation/figure [App. D, ICP]
15	7/20/2011	Corrected minor inaccuracies in Cross Refr. section [App. F, ICP]
15	7/20/2011	Added USCG/EPA jurisdictional interface valves to

		facility diagrams [Figs. 1-8, ERAP & ICP]
16	7/26/2011	Personnel updates (replaced Tefertiller with Everett) [Figs. 1-3 & 3.4-1, ERAP & ICP]
17	9/16/2011	Update & recertification of SPCC Plan [App. E]
18	10/11/2011	Misc. updates to product/tankage listings [Fig. D-1, App. E]
19	11/3/2011	Added restrictive language regarding dispersant usage [Sect. 6, Fig. 6.3-2]
20	5/22/2013	Personnel changes [removed N. Everett, added A. Sanchez Jr, updated address & phone of C. Arizmendi; Figs 1-3 & 3.4-1, ICP & ERAP]
21	7/1/2013	Misc. updates to product/tankage listings [Fig. D-1, App. E]
22	1/9/2014	Personnel updates (removed A. Sanchez & J. Zamora, added M. Casas; updated title of C. Arizmendi); various updates to External Notifications [Fig. 1-3 & 3.4-1, ICP & ERAP]
23	1/16/2014	Various technical updates & revisions, requested by PHMSA via letter of 12/30/13. [Figs. 1-3 & 3.4-1, Sects. 1.2 & 6.4, App. B]

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FIGURE 1-2 - DISTRIBUTION LIST

PLAN HOLDER	ADDRESS	NUMBER OF COPIES	DISTRIBUTION DATE
ESOH / Operations	200 Mansell Court East, Suite 600 Roswell, GA 30076	1	November 2010
Facility [1 ICP + 7 ERAPs]	10150 State Highway 48 Brownsville, TX 78521	7	November 2010
EPA (Region VI)- [6SF-RP] Sr. On-Scene Coordinator [on-line access]	1445 Ross Avenue Dallas, TX 75202-2733	1	November 2010
USCG- MSD Brownsville	1801 Capt. Don L. Faust Rd. Brownsville, TX 78521	1	November 2010
Deputy Port Director (ERAP only)	Brownsville Navigation District 1000 Foust Road Brownsville, TX 78521	1	November 2010
US DOT (Office of Pipeline Safety)- Response Plans Officer	400 Seventh St, SW, Room 7128 Washington, D.C. 20590	2	November 2010

[CD ROM]

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FIGURE 1-3 - INFORMATION SUMMARY (QI LIST)

Owner/Operator:	TransMontaigne Operating Co. L.P. 200 Mansell Court East, Suite 600 Roswell, GA 30076
Facility Name:	Brownsville Terminal Complex
Facility Mailing Address:	10150 State Highway 48 (Main Office) Brownsville, Texas 78521
Facility Latitude/Longitude:	(b) (7)(F)
Facility Telephone/Fax:	(956) 831-3531/ (956) 831-0448
Agency Plan Identification Numbers:	EPA -FRP-06-TX-00031, 00072, 00134, 00624, 00285 USCG -BRNDWF26 DOT -1621
Description of Facility:	<p>This Facility is a "Complex Facility," consisting of five (5) terminal areas occupying property along the north and south sides of the Brownsville Ship Channel. There are product lines connecting the tank farms to various docks on the Channel. In addition, there is the 17.44 mile, 10-inch Frontera Pipeline (constructed in 2003) from the Rio Grande/U.S.-Mexico border into the 3203-3206 series tank farm on the North side of the channel.</p> <p>All improvements (with the exception of dock structures) are owned by TransMontaigne, with the land being leased from the Brownsville Navigation District.</p> <p>The Facility has a total storage capacity (b) (7)(F), with an average storage volume of (b) (7)(F). The facility has a total of 103 bulk liquid storage tanks, & products may be received by and/or delivered to ship, barge, pipeline, truck, and rail car. Marine transfers may occur simultaneously with up to seven (7) vessels, across five (5) different dock areas.</p> <p>Products handled include: Heavy Oils, Lube Oils, Distillate Fuels, Gasolines, Toluene, Asphalts, Vegetable Oils, Animal Fats/Oils, Waxes, Methylene Chloride, Glycols, Naphthas/Solvents, Hexanes/Alcohols, Acids/Peroxides, Latex Note: Material Safety Data Sheets (MSDS) are maintained separately at the Facility (Main Office).</p> <p>Since this Facility periodically handles vegetable oils & animal fats, local personnel have had detailed conversations with the Brownsville Fire Dept. regarding their fire-fighting capabilities. Fire Dept. personnel are very confident in their resources (equipment, supplies,</p>

	<p>personnel, & training) for responding to fires involving vegetable oils & animal fats.</p> <p>Substantial expansions consisting primarily of additional tankage are listed in Fig. D-1.</p>
Driving Directions:	From the intersection of Highways 511 and 48, proceed east on old Highway 48, into the Port. Main office is located on the right (north side of Ship Channel), approximately two (2) miles from Highway 511.

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FIGURE 1-3 - INFORMATION SUMMARY (QI LIST), CONTINUED

<p>Qualified Individuals or Alternate: PRIMARY</p> <p>ALTERNATES</p> <p>(Refer to APPENDIX A, FIGURE A.2-3 for QI Training)</p> <p>(Refer SECTION 4.5 for QI Responsibilities Authorities) *24 Hour</p>	<p>Kevin Garcia General Manager- Brownsville TX (956) 831-3531 (Office) (b) (6) (956) 371-3916* (Mobile)</p>	<p>1840 Illinois Avenue Brownsville, TX 78521</p>
	<p>Carlos Arizmendi Operations Manager- Brownsville TX (956) 831-3531 (Office) (956) 592-1660* (Mobile)</p>	<p>31445 FM3069 Bayview, TX 78566</p>
	<p>Melchor "Malcom" Casas Area Safety Coordinator (956) 554-4036 (Office) (b) (6) (956) 371-7748* (Mobile)</p>	<p>922 S. Palm Blvd. Harlingen, Texas 78552</p>
	<p>Andy McClish Manager, Reg. Compliance- Atlanta Office (770) 518-3701 (Office) (b) (6) (678) 488-4524* (Mobile)</p>	<p>5237 Forest Brook Parkway Marietta, GA 30068</p>
	<p>Brian Temples Director, Safety- Atlanta Office (770) 518-3756 (Office) (706) 252-0282* (Mobile)</p>	<p>315 Ervin Coker Road Rome, GA 30161</p>
	<p>Tommy Jordan Director, Operations- Atlanta Office (770) 518-3588 (Office) (b) (6) (678) 427-9325* (Mobile)</p>	<p>11075 Pennbrook Crossing Duluth, GA 30097</p>
	<p>Steve McNelly General Mgr., Operations- Atlanta Office (770) 518-3753 (Office)</p>	<p>3580 Willow Wind Court Loganville, GA 30052</p>

(b) (6) (678) 910-1510* (Mobile)	
Dudley Tarlton Vice President, ESOH- Denver Office (303) 626-8200 [8219] (Office) (b) (6) (720) 308-8596* (Mobile)	5405 South Niagara Court Greenwood Village, CO 80111
Greg Pound President, C.O.O. - Atlanta Office (770) 518-3707 (Office) (b) (6) (404) 386-5426* (Mobile)	3032 Oaktree Landing NE Marietta, GA 30068

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FIGURE 1-3 - INFORMATION SUMMARY (QI LIST), CONTINUED

Pipeline Response Zone Consists of the Following Counties:	Cameron County					
Pipeline Sections/ Products Handled: (Refer to Product Characteristic and Hazards, FIGURE D-7)	Section	Diameter		Product		
	Frontera	10 in.		Refined Petroleum Products		
Facility Data: (See APPENDIX D-1 for date and type of substantial expansion)	Facility	Location (Address and County)	Hours of Operations/ Manned	*Throughput (bbls per day)	Date of Startup	Wellhead Protection Area
	Brownsville Terminal Complex	Cameron County 10150 State Highway 48 (Main Office) Brownsville, Texas 78521	24 hours/day; 7 days/week	20,000 - 25,000	1986	No Impact
Alignment Maps: (Piping, Plan Profiles)	Located in Main Complex Office and in Atlanta Office					

PHMSA Worst Case Discharge:	(b) (7)(F)
Spill Detection and Mitigation Procedures:	Refer to SECTION 2.
Statement of Significant and Substantial Harm:	The response zones in this system all contain pipelines greater than 6 5/8 inches and are longer than ten miles. At least one section of pipeline in each response zone crosses a major waterway or comes within five miles of a public drinking water intake. Therefore, in accordance with 49 CFR 194.103(c), each entire response zone described in this Plan will be treated as if expected to cause significant and substantial harm.
Date Prepared:	Jan., 2005; Nov. 2010

*The rate of flow from the pipeline system to tankage and the filling rates of the trucks are essentially fixed, and not a function of daily throughput. Thus, changes in daily throughput would have no effect on potential discharge volumes. The Facility has sufficient tank volume to handle any potential increase in pipeline throughput (from the dock) and the truck rack has sufficient capability to handle any potential increase in transfer capacity.

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

Note: For further information on the training and qualifications of Qualified Individuals, refer to **SECTION 4.5** and **APPENDIX A.2** in this Plan.

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FIGURE 1-4 - RESPONSE ZONE MAP

[Click here to view Brownsville Terminal Complex Response Zone Map FIGURE 1-4](#)

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FIGURE 1-5 - PIPELINE SYSTEM OVERVIEW MAP

[Click here to view Brownsville Terminal Complex Pipeline System Overview Map FIGURE 1-5](#)

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FIGURE 1-6 - FACILITY AREA MAP

[Click here to view Brownsville Terminal Complex Area Map FIGURE 1-6](#)

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FIGURE 1-7 - FACILITY LOCATION MAP

[Click here to view Brownsville Terminal Complex Location Map FIGURE 1-7](#)

FIGURE 1-8 - PLOT PLAN

[Click here to view Brownsville Terminal Complex Plot Plan FIGURE 1-8a](#)

[Click here to view Brownsville Terminal Complex Plot Plan FIGURE 1-8b](#)

[Click here to view Brownsville Terminal Complex Plot Plan FIGURE 1-8c](#)

[Click here to view Brownsville Terminal Complex Plot Plan FIGURE 1-8d](#)

[Click here to view Brownsville Terminal Complex Plot Plan FIGURE 1-8e](#)

[Click here to view Brownsville Terminal Complex Plot Plan FIGURE 1-8f](#)

[Click here to view Brownsville Terminal Complex Plot Plan FIGURE 1-8g](#)

[Click here to view Brownsville Terminal Complex Plot Plan FIGURE 1-8h](#)

[Click here to view Brownsville Terminal Complex Plot Plan FIGURE 1-8i](#)

[Click here to view Brownsville Terminal Complex Plot Plan FIGURE 1-8j](#)

[Click here to view Brownsville Terminal Complex Plot Plan DOCK LINES/ USCG VALVES](#)

1.1 PURPOSE / SCOPE OF PLAN

The purpose of this Integrated Contingency Plan (ICP) is to provide guidelines to quickly, safely, and effectively respond to an emergency at the Brownsville Terminal Complex and associated pipeline system. The facilities and associated pipelines owned and operated by TransMontaigne Operating Co. L.P., are herein referred to as "Company."

This Plan is intended to satisfy the requirements of the Oil Pollution Act of 1990 (OPA 90), and has been prepared in accordance with the National Oil and Hazardous Substances Pollution Contingency Plan (NCP) and applicable Area Contingency Plans (ACP), EPA Region (EPA Region 6) Regional Contingency Plan, and its South Texas Coastal Zone ACP, MSO Corpus Christi (GRP's) in the One Gulf Plan Sub-Area Emergency Response Action Plan. 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)
- US Environmental Protection Agency (EPA) requirements for an OPA 90 plan (40 CFR 112.20)
- EPA requirements for a Spill Prevention Control and Countermeasures (SPCC) Plan (40 CFR 112.7)
- US Coast Guard (USCG) requirements for an OPA 90 Plan (33 CFR Part 154)

- Occupational Safety and Health Administration (OSHA) requirements for Emergency Action Plans (EAP and ERP) (29 CFR 1910)

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1.2 PLAN REVIEW AND UPDATE PROCEDURE

The ESOH Department will coordinate the following plan review and update procedures with regional and local Management.

In accordance with 49 CFR Part 194.121 and 40 CFR 112.20, this Plan will be reviewed annually and modified to address new or different operating conditions or information included in the Plan. In the event that the Company experiences a Worst Case Discharge the effectiveness of the plan will be evaluated and updated as necessary.

Upon review of the response plan for each five-year period, the plan will be submitted to PHMSA prior to 5 years from the last approval date.

If new information or different operating conditions would substantially effect 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. EPA must receive the changes within 60 days.

The US Coast Guard (USCG) requires that plan changes be submitted in a timely manner to the MSO. The plan review must occur within one (1) month of the anniversary date of the USCG approval letter. If no changes are required, the facility shall submit a letter to the USCG stating "No Changes Required."

Examples of changes in operating conditions that would cause a significant change to the Plan include:

CONDITIONS REQUIRING REVISIONS AND SUBMISSIONS	EPA	DOT	USCG
Relocation or replacement of the transportation system in a way that substantially effects the information included in the Plan, such as a change to the Worst Case Discharge volume.	X	X	
A change in the Facility's configuration that materially alters the information included in the Plan.	X		X
A change in the type of oil handled, stored, or transferred that materially alters the required response resources.	X	X	X
A change in key personnel (Qualified Individuals).	X	X	
A change in the name of the Oil Spill Removal Organization (OSRO).		X	X
Material change in capabilities of the Oil Spill Removal Organization(s) (OSROs) that provide equipment and personnel.	X		
Material change in the Facility's spill prevention and response equipment or emergency response procedures.	X	X	X
Any other changes that materially affect the implementation of	X	X	X

the Plan.			
A change in the NCP or ACP that has significant impact on the equipment appropriate for response activities.		X	
A change in the Facility's operating area that includes ports or geographic area.			X

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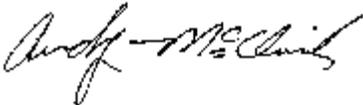
1.3 CERTIFICATION OF ADEQUATE RESOURCES

CERTIFICATION

Pursuant to the Clean Water Act Section 311(j)(5)(F)

TransMontaigne Operating Co. L.P.

TransMontaigne Operating Co. L.P., hereby certifies to the Pipeline and Hazardous Materials Safety Administration of the Department of Transportation that they have 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.



Andy McClish
Manager, Regulatory Compliance

Brownsville Terminal Complex September 2004

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1.4 AGENCY SUBMITTAL / APPROVAL LETTERS

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DOT APPROVAL LETTERS

(Insert Here)

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DOT APPROVAL LETTERS, CONTINUED

(Insert Here)

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EPA APPROVAL LETTERS

(Insert Here)

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EPA APPROVAL LETTERS, CONTINUED

(Insert Here)

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USCG APPROVAL LETTERS

(Insert Here)

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USCG APPROVAL LETTERS, CONTINUED

(Insert Here)

SECTION 2

INITIAL RESPONSE ACTIONS

Figure 2-1 - Emergency Reporting and Facility Alarms

Figure 2-2 - Initial Response Flowchart

Figure 2-3 - Initial Response Action Checklist

2.1 Spill Response

Figure 2.1-1 - Spill Response Action Checklist

2.1.1 Spill Detection and Mitigation Procedures

Figure 2.1-2 - Spill Mitigation Procedures

2.1.2 Spill Surveillance Guidelines

Figure 2.1-3 - Oil Spill Surveillance Checklist

2.1.3 Spill Volume Estimating

Figure 2.1-4 - Spill Estimation Factors

2.1.4 Estimating Spill Trajectories

2.1.5 Initial Containment Actions

2.1.6 Safety Considerations

2.2 Fire / Explosion / Vapor Release

2.2.1 Fire, Explosion, and Vapor Release Response Actions

2.2.2 Fire Fighting Tactics

2.2.3 BLEVE - Boiling Liquid Expanding Vapor Explosion

2.3 Medical Emergency / Personal Injury

2.3.1 Medical Emergency / Personal Injury Response Actions

2.4 Natural Disaster / Severe Weather

2.4.1 Earthquake Procedure

SECTION 2

INITIAL RESPONSE ACTIONS, CONTINUED

2.4.2 Flooding Procedure

2.4.3 Hurricane Procedure

2.4.4 Tornado Procedure

2.5 Security Related Incidents

2.5.1 Threats to Personnel and Facilities

2.5.2 Criminal Acts / Workplace Violence

2.5.3 Sabotage / Bomb Threat / Suspicious Package

2.5.4 Threat Receipt Precautions

Figure 2.5-1 - Threat Documentation Report Form

2.6 Evacuation

2.6.1 Evacuation Alarm

2.6.2 Critical Operations and Initial Response Actions

2.6.3 Protection Options - Evacuation vs. Shelter In Place

2.6.4 Evacuation Routes

2.6.5 Shelter and Evacuation Muster Point Locations

2.6.6 Personnel Accountability

2.6.7 Shelter In Place Guidelines

2.6.8 Public Protective Measures

Figure 2.6-1 - Evacuation Procedure Checklist

Figure 2.6-2 - Facility Shelter and Evacuation Muster Point Plot Plan

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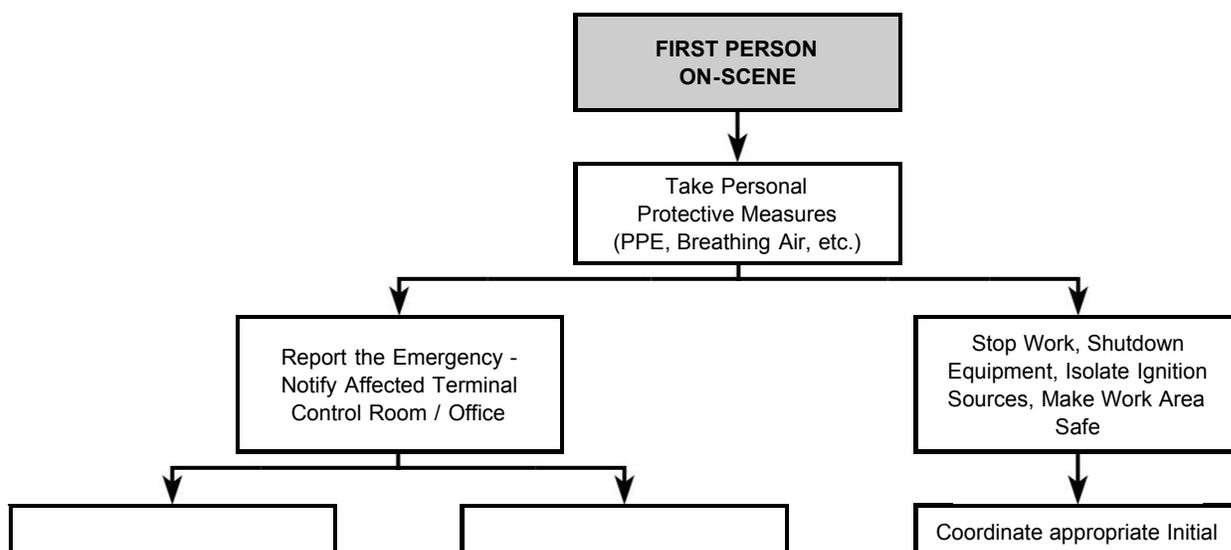
FIGURE 2-1 - EMERGENCY REPORTING AND FACILITY ALARMS

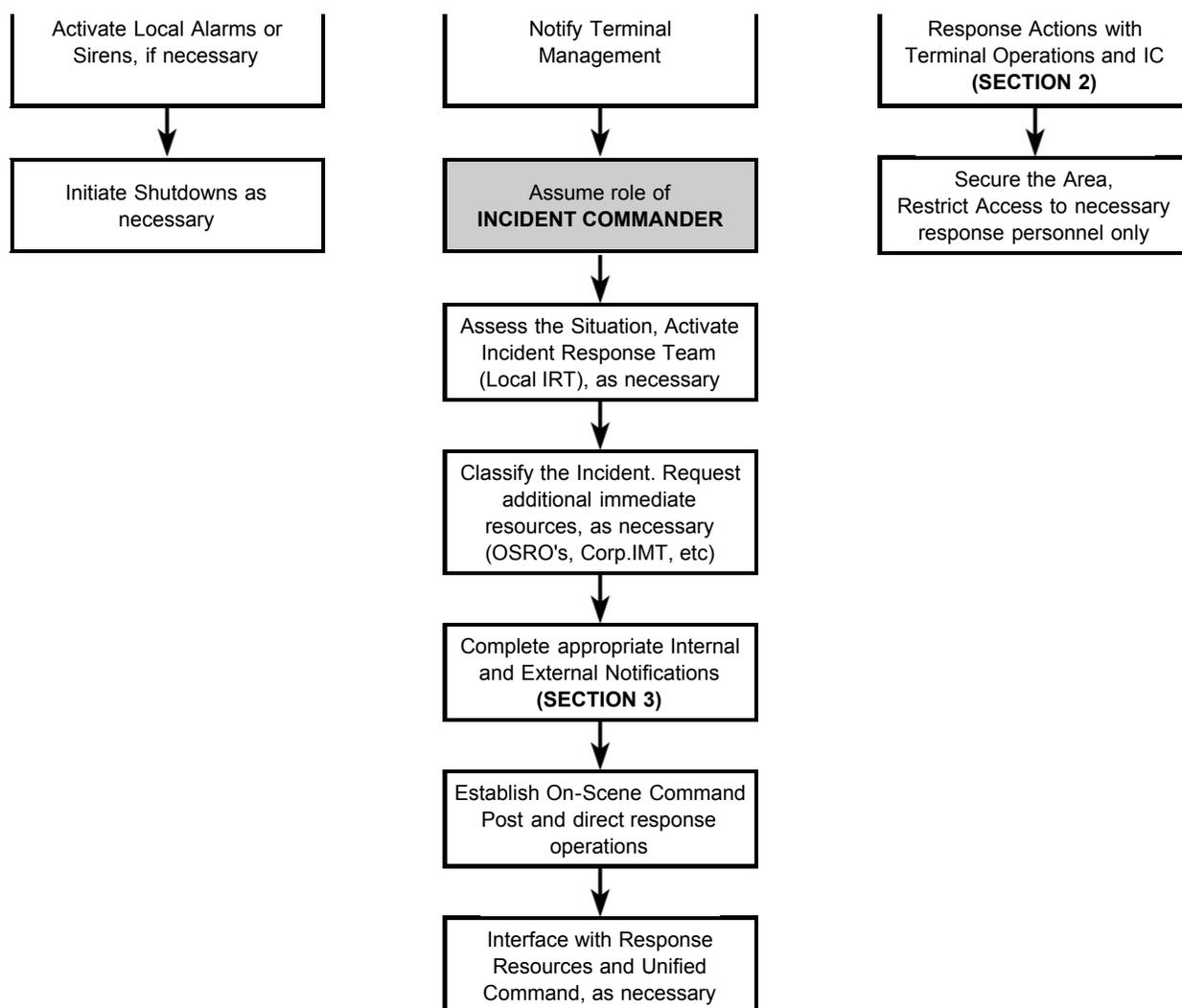
Facility Emergencies are Reported to (Office and/or Position):	Terminal Manager and/or Operations Director	
Facility Emergency Number(s):	(956) 831-3531	
Emergency Reporting Protocol:	<p>Immediately notify the Terminal Manager.</p> <p>Activate the Emergency Response Team (local team), as the situation demands.</p> <p>Activate local emergency response resources [Oil Spill Removal Organizations (OSRO), fire, police, medical, etc.].</p> <p>Notify the Area Manager or Operations Director (if applicable), as the situation demands.</p> <p>Notify a member of the Emergency Management Team (corporate team) and other external organizations, as the situation demands.</p>	
Facility Alarm Descriptions:	Alarm Type	Alarm Description
	Hand Aerosol Horn	Three Short Blasts
Immediate Actions:	Refer to SECTION 2 Initial Response Actions Checklists for appropriate response actions.	

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FIGURE 2-2 - INITIAL RESPONSE FLOWCHART





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FIGURE 2-3 - INITIAL RESPONSE ACTION CHECKLIST

SPECIFIC RESPONSE ACTIONS	COMMENTS
First Person On-Scene	
Take appropriate personal protective measures.	
Notify Terminal Management of the incident.	
Advise personnel in the area of any potential threat and/ or initiate evacuation procedures.	
Eliminate possible sources of ignition in the vicinity of the spill.	
Restrict access to the incident scene and surrounding area as the situation demands.? Take any other steps necessary to minimize any threat to health and safety.	
Initiate the appropriate Initial Response Actions (SECTION 2).	
Request medical assistance if an injury has occurred.	
Verify the type of product and quantity released, request/obtain Material Safety Data Sheets as necessary.	

Identify/ isolate the source and minimize the loss of product.	
Initiate containment of spill material.	
Coordinate further initial response actions with local supervision and Incident Commander.	
Qualified Individual/Incident Commander	
Evaluate the Severity, Potential Impact, Safety Concerns, and Response Requirements based on the initial information provided by the First Person On-Scene.	
Assume the role of Incident Commander.	
Classify the incident (SECTION 3.1).	
Confirm safety aspects at site, including need for personal protective equipment, sources of ignition, and potential need for evacuation.	
Activate the Incident Response Team (IRT), as the situation demands (SECTION 4).	
Notify Area Manager or Director, as appropriate.? Provide incident briefing and coordinate activation of Corporate Incident Management Team (IMT), as the situation demands.	
Notify National Response Center and the appropriate state and local officials.	
Activate additional response contractors and local response resources, as the situation demands (SECTION 3).	
Coordinate/complete additional Internal and External Notifications (SECTION 3).	
Proceed to incident site and direct response and clean-up operations.	
Incident Response Team (Local IRT)	
Designated IRT personnel will immediately respond to an incident at the Facility, or Facility Pipelines, as the situation demands.	
Perform response/cleanup operations as directed or coordinated by the Incident Commander.	
Refer to SECTION 6 for detailed discussion and mapping of Sensitive Areas and SECTION 7.4 for Disposal Plans.	
Assist as directed at the incident scene.	

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2.1 SPILL RESPONSE

FIGURE 2.1-1 - SPILL RESPONSE ACTION CHECKLIST

SPECIFIC RESPONSE ACTIONS	COMMENTS
Line Break or Leak	
Shut down source/pumping equipment.	

Close upstream and downstream valves.	
Utilize Combustible Gas Indicator, O ₂ meter, proper colorimetric indicator and other air sampling measurements (as applicable) to assure that areas are safe to enter for continued response operations.	
Mitigate spreading of the product, as the situation demands.? Potential containment strategies include: <ul style="list-style-type: none"> • Deployment of boom (Reference ACP for potential strategies) • Diking, trenching, and/ or diversion • Spreading sorbent material over the spill • Prevent the spill from entering water to the greatest extent possible 	
Determine the direction and expected duration of spill movement.? Refer to SECTION 2.1.2.	
Drain the line section, as the situation demands.	
Request local authorities to establish scene security and traffic control in the area, as the situation demands.	
Make all necessary repairs.	
Return the line/rack to service when repairs are complete.	
Clean up spilled product to eliminate any possible environmental problems.? Be alert for underground cables.	
If the spill escapes the containment area, review the location of socio-economic and environmentally sensitive areas identified in SECTION 6. ? Determine which of these may be threatened by the spill and direct the response operation to these locations. Initiate protection and recovery actions.	
Inform local utilities, telephone company, railway, etc., as necessary.	
Complete follow-up and written reporting, as the situation demands.	
Storage Tank Leak	
Shutdown all tank product movement operations and isolate the tank.	
Initiate Confined Space Entry procedures, as applicable.	
Insure that the containment area drainage valve(s) is closed.	
If leak is near tank bottom, create and maintain a ?water bottom? to suspend the discharge of product.	
Utilize Combustible Gas Indicator, O ₂ meter, proper colorimetric indicator and other air sampling measurements (as applicable) to assure that areas are safe to enter for continued response operations.	
Block drainage of spilled material from traveling off-site.	
Stop all traffic in hazardous area (inside and outside of property boundaries), as the situation demands.	
Remove product from containment (at a sump or in a low area) with an explosion proof pump, oil skimmer, and/or vacuum truck w/ skimmer attachments.	

FIGURE 2.1-1 - SPILL RESPONSE ACTION CHECKLIST, CONTINUED

SPECIFIC RESPONSE ACTIONS	COMMENTS
Storage Tank Leak, Continued	
If applicable, process remaining product through a separator system.	
Determine the direction and expected duration of spill movement.? Refer to SECTION 2.1.2.	
Request that local authorities establish scene security and traffic control in the area, as necessary.	
Empty tank as soon as possible.	
Make all necessary repairs.? Return the line/tank to service when repairs and integrity testing are completed.	
Clean up product spill to eliminate any possible environmental problems.? Be alert for underground cables, conduits, etc.	
If necessary, call an approved waste removal company to handle the remaining sludge and residue from the containment area.	
If the spill escapes the containment area, review the location of socioeconomic and environmentally sensitive areas identified in SECTION 6 and the ACP.? Determine which of these may be threatened by the spill and direct the response to these locations.? Initiate protection and recovery actions.	
Inform local operators such as utilities, telephone company, railway, as necessary.	
Complete follow-up and written reporting, as the situation demands.	
Leak or Spill at Truck Rack	
Evacuate personnel from the truck rack area, as the situation demands.	
Shutdown all loading operations, pump motors and loading valves.	
Guard against all sources of ignition.	
Secure the area. Stop all traffic from entering rack or hazardous area.	
If a line leak is involved, close off riser valves and/or tank valves.	
Clean area with sorbent material, flush (with water) all remaining product into a separator system.	
Resume truck loading operations as directed by Terminal Management.	
Truck Leaks/Spills Outside Terminal	
<i>Note: This type of spill will rarely be the responsibility of Terminal personnel.</i>	
Notify local fire and police departments.	
Secure the area. Keep all traffic away from the scene.	
Notify Terminal Management of the incident with the following	

information:	
<ul style="list-style-type: none"> • Location of spill. • Size of spill. • Product type. • Present situation. • If assistance/equipment is required for cleanup. • If product spills on a highway or other impervious surface, clean area with sorbent materials, vacuum truck, or other cleanup equipment as available or necessary. If product has entered sewer system, advise the local Fire Department. 	
Consider the need to evacuate area residents. Request assistance from local authorities (fire, police departments) as necessary.	
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FIGURE 2.1-1 - SPILL RESPONSE ACTION CHECKLIST, CONTINUED

SPECIFIC RESPONSE ACTIONS	COMMENTS
Marine Operation Spills/Leaks (as appropriate)	
Shut down all engines/motors.	
Close all line and vessel manifold discharge valves.	
If hose rupture is involved, drain line into vessel, drums or buckets, and blank line to stop spill into water.	
Initiate Confined Space Entry procedures, as applicable.	
Utilize Combustible Gas Indicator, O ₂ meter, proper colormetric indicator and other air sampling measurements (as applicable) to assure that areas are safe to enter for continued response operations.	
If other than hose rupture, determine source of leak and stop discharge.	
Prevent discharge from entering the water if at all possible by: <ul style="list-style-type: none"> • Pumping from sump or deck drainage system into drums, tanks, containment area, or other storage facility. • Directing the flow into a containment or collection area away from the water, if feasible. • Placing containment boom or sorbent material around area (provided that a safe operating environment exists). 	
If product enters the water and a safe operating environment exists, try to contain by: <ul style="list-style-type: none"> • Deploying spill response equipment (facility and/or contract) to prevent/mitigate spill impact (spreading of spill). 	
Attempt to divert/contain the spill:	

<p>In quiet area or low current areas of the water.</p> <ul style="list-style-type: none"> • Away from strong winds or in areas that could be affected by change in wind direction. • Away from areas of hazard to public, property improvements, marinas, water intakes, or any environmentally sensitive areas. 	
Make all necessary repairs.	
Return the line/vessel to service when repairs are complete.	
Clean up spilled product to eliminate any possible environmental problems. Be alert for underground cables, etc.	
If the spill escapes the containment area, review the location of socioeconomic and environmentally sensitive areas identified in SECTION 6 and the ACP. Determine which of these may be threatened by the spill and direct the response operation to these locations. Initiate protection and recovery actions.	
Request local authorities (USCG, Port Authority, etc.) to establish traffic control in the area, as the situation demands.	
Inform local operators such as utilities, telephone company, railway, as necessary.	
Complete follow-up and written reporting, as the situation demands.	

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2.1.1 Spill Detection and Mitigation Procedures

See **APPENDIX D.1** for spill detection protocols.

Each spill mitigation situation is unique and must be handled according to the circumstances 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. Spill mitigation procedures are listed in **FIGURE 2.1-2**. Worst Case Discharge volume calculations and discussion are provided in **APPENDIX D**.

FIGURE 2.1-2 - SPILL MITIGATION PROCEDURES

TYPE	MITIGATION PROCEDURE
Failure of Transfer Equipment	<ul style="list-style-type: none"> • Personnel safety is the first priority. Evacuate nonessential personnel or personnel at high risk. • Terminate transfer operations and close all affected valves. • Drain product into containment areas if possible. • Eliminate sources of vapor cloud ignition by shutting down all engines and motors.
Tank/Overfill/Failure	<ul style="list-style-type: none"> • Personnel safety is the first priority. Evacuate nonessential personnel or personnel at high risk. • Shut down or divert source of incoming flow to tank. • Transfer fluid to another tank with adequate storage capacity (if possible).

	<ul style="list-style-type: none"> • Shut down source of vapor cloud ignition by shutting down all engines and motors. • Ensure that dike discharge valves are closed. • Monitor diked containment area for leaks and potential capacity limitations. • Begin transferring spilled product to another tank as soon as possible.
Piping Rupture/Leak (under pressure or not)	<ul style="list-style-type: none"> • Personnel safety is the first priority. Evacuate nonessential personnel or personnel at high risk. • Shut down pumps. Close the closest valves on each side of the rupture. • Drain the line back into contained areas (if possible). Alert nearby personnel of potential safety hazards. • Shut down source of vapor cloud ignition by shutting down all engines and motors. • 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.
Fire/Explosion	<ul style="list-style-type: none"> • Personnel safety is the first priority. Evacuate nonessential personnel or personnel at risk of injury. • Notify local fire and police departments. • Attempt to extinguish fire if it is in incipient (early) stage. • Shut down transfer or pumping operation. Attempt to divert or stop flow of product to the hazardous area (if it can be done safely). • Eliminate sources of vapor cloud ignition by shutting down all engines and motors. • Control fire before taking steps to contain spill.
Manifold Failure	<ul style="list-style-type: none"> • Personnel safety is the first priority. Evacuate nonessential personnel or personnel at high risk. • Terminate transfer operations immediately. • Isolate the damaged area by closing block valves on both sides of the leak/rupture. • Shut down source of vapor cloud ignition by shutting down all engines and motors. • Drain fluids back into containment areas (if possible).

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2.1.2 Spill Surveillance Guidelines

- 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 spills' 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.
- 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 to gauge the effectiveness of response operations; to assist in locating skimmers; and assess the spill's size, movement, and impact.
- An Oil Spill Surveillance Checklist is provided in **FIGURE 2.1-3**.

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FIGURE 2.1-3 - OIL SPILL SURVEILLANCE CHECKLIST

Record your observations of spilled oil either in a notebook or directly on a map of the area under observation. This checklist is an aid for organizing your observations. File used forms with local area office to retain for five years.

General Information	
Date:	Tidal or River Stage, if applicable (flood, ebb, slack, low water):
Time:	On-Scene Weather (wind, sea state, visibility):
Incident Name:	Observation Platform (helicopter, fixed-wing

	aircraft, boat):
Observer's Name:	Flight path/trackline:
Observer's Affiliation:	Altitude where observation taken:
Location of Source (if known):	Areas not observed (i.e. foggy locations, restricted air spaces, shallow water areas):
Oil Observations	
Slick Location(s):	Color and Appearance (i.e. rainbow, dull or silver sheen, black or brown in color or mousse):
Slick Dimensions:	Percent Coverage:
Orientation of Slick(s):	Is Oil Recoverable (Y/N)?:
Distribution of Oil (i.e. windrows, streamers, pancakes or patches):	
Considerations	
<ul style="list-style-type: none"> • During surveillance flights, travel beyond known impacted areas to check for additional oil spill sites • Include the name and phone number of the person making the observations • Clearly describe the locations where oil is observed and the areas where no oil has been seen 	
Other Observations	
Response Operations	
Equipment deployment (general locations where equipment is working and whether they are working in the heaviest concentration of oil):	
Boom deployment (general locations of boom, whether the boom contains oil, and whether the oil entrains under the boom):	
Environmental Observations	
Locations of convergence lines, terrain, and sediment plumes:	
Locations of debris and other features that could be mistaken for oil:	

Wildlife present in area (locations and approximate numbers):

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2.1.3 Spill Volume Estimating

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

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

Some rapid methods to estimate spill size are:

- Transfer operations: Multiply the pumping rate by the elapsed time that the leak was in progress, plus the drainage volume of the line between the two closest valves or isolation points (volume loss = pump rate [bbls/min] x elapsed time [min] + line contents [bbl])
- Tank overfills: Elapsed time multiplied by the pumping rate
- Visual assessment of the surface area and thickness (**FIGURE 2.1-4**); the 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

FIGURE 2.1-4 - SPILL ESTIMATION FACTORS

OIL THICKNESS ESTIMATIONS				
Standard Form	Approx. Film Thickness		Approx. Quantity of Oil in Film	
	inches	mm		
Barely Visible	0.0000015	0.00004	25 gals/mile ²	44 liters/km ²
Silvery	0.000003	0.00008	50 gals/mile ²	88 liters/km ²
Slightly colored	0.000006	0.00015	100 gals/mile ²	179 liters/km ²
Brightly colored	0.000012	0.0003	200 gals/mile ²	351 liters/km ²
Dull	0.00004	0.001	666 gals/mile ²	1,167 liters/km ²

Dark	0.00008	0.002	1,332 gals/mile ²	2,237 liters/km ²
Thickness of light oils: 0.0010 inches to 0.00010 inches				
Thickness of heavy oils: 0.10 inches to 0.010 inches				

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2.1.4 Estimating Spill Trajectories

In some cases, oil spill trajectories should be estimated in order to predict direction and speed of the slick movement. Trajectory calculations provide an estimate of where oil slicks may impact shorelines and other sensitive areas, and also provide an estimate of the most effective location in which to mobilize spill response resources for protection, containment, and recovery.

Oil spill trajectories can be estimated using vector addition or with computer programs such as CAMEO. Hand calculations typically utilize the following assumptions:

- Oil moves at approximately the same direction and speed as the water currents, unless the winds are strong
- Wind speed can be multiplied by 0.034 to determine the effect of winds on speed and direction of spill movement
- The combined effects of winds and currents can be added to estimate spill movement speed and direction

More sophisticated predictions can be obtained from computer programs. Oil spill trajectory services can be obtained from:

- National Oceanic and Atmospheric Administration (NOAA) through the Federal On-Scene Commander (FOSC)
- Private consulting firms

2.1.5 Initial Containment Actions

Initial containment actions will focus on utilizing containment on site in the most effective manner to:

- Prevent the oil from impacting water, thereby reduce the surface area and the shoreline to be cleaned
- Concentrate the oil (when safe to do so), making physical recovery more efficient
- Limit the environmental impact to the immediate spill area

Selection of the appropriate location and method will depend upon:

- Length of time spill occurs before being noticed
- Amount of spill

- Area of coverage
- Environmental factors such as wind speed and direction
- Oil's characteristics

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2.1.6 Safety Considerations

- Containment actions should not be conducted during inclement weather or unsafe conditions such as high winds, fast currents, or unstable terrain
- Eliminate all ignition sources
- Avoid contact with the spilled product
- Use respiratory protection (if applicable)
- Ensure that the area remains secure to air traffic

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2.2 FIRE / EXPLOSION / VAPOR RELEASE

2.2.1 Fire, Explosion, and Vapor Release Response Actions

SPECIFIC RESPONSE ACTIONS	COMMENTS
FIRE / EXPLOSION	
Discontinue all tasks in progress (hot work, truck loading, maintenance, etc.).	
Sound local fire alarm, if available.	
Attempt to extinguish incipient stage fires, if trained to do so.	
Report the condition to Terminal Management and take further defensive actions as instructed.	
Engage emergency shutdown systems and/or manually (from a safe distance) isolate fuel sources, shutdown engines and heaters.	
Evacuate personnel to designated assembly areas.	
Account for personnel.	
Initiate rescue activities as necessary, if properly trained.	
Make appropriate notifications to local fire and EMS. Make other internal management contacts as appropriate. (SECTION 3)	
Establish a secure perimeter around the area to prevent unauthorized entry.	

Initiate Site Security Plan. (SECTION 5.6)	
Continue measures to contain the fire, apply water from a safe distance to protect adjacent equipment, if necessary.	
Recognize fire conditions which present BLEVE hazards and protect personnel and the public appropriately. (SECTION 2.2.3)	
Contain spilled material and runoff. Dike far ahead of the release, as necessary.	
Make appropriate government agency notifications. (SECTION 3)	
Conduct post-incident activities. (SECTION 8)	
VAPOR RELEASE	
Report the release to Facility Manager.	
Sound the facility alarm.	
Do not assume vapors or gases are harmless because of lack of odor - Harmful vapors or gases may be odorless.	
Evacuate personnel from the immediate area to the designated assembly area or to a location upwind of the release.	
Account for personnel.	
Engage emergency shutdown systems, and/or manually isolate release from a safe distance.	
Isolate all sources of potential ignition.	
Establish a secure perimeter around the area to prevent unauthorized entry.	
Complete internal and external notifications, as appropriate.	
Assess the threat to the public and notify public officials as appropriate.	
Initiate evacuation of surrounding homes, businesses, etc. with assistance from local law enforcement officials, as necessary.	
Conduct post-incident activities. (SECTION 8)	

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2.2.2 Fire Fighting Tactics

Upon discovering a fire:

- Attempt to extinguish incipient stages of fire, only if trained to do so.
- Block in the fuel source by tripping the ESD or manually from a safe distance.
- Protect the surrounding exposed areas and cool the burn area to control the fire.
- Withdraw personnel and notify local fire department.
- Confer with fire department personnel about the need for any special tactics or materials (e.g., alcohol-resistant foam for ethanol-based fires).

Safety Guidelines:

Any efforts made to rescue personnel and protect property or the environment must be weighed against the possibility that you could become part of the problem.

- Evacuate and account for personnel as necessary.
- Continue to reassess the situation and modify the response accordingly.
- **Do not walk into or touch spilled materials.**
- Do not assume vapors are harmless because of a lack of odor - **Harmful gases or vapors may be odorless.**

2.2.3 BLEVE - Boiling Liquid Expanding Vapor Explosion

BLEVE occurs when:

- Sealed containers of liquefied gases are accidentally exposed and enveloped by fire.
- Vapor is generated and internal pressure rapidly rises.
- The container wall temperature rises in the outage or unfilled area.
- Wall strength deteriorates and the stress applied by the increased pressure exceeds the reduced strength of the wall.
- The container ruptures and super-heated liquid is released, expands and vaporizes in seconds resulting in catastrophic damage from the spread of ignited vapors. The ruptured vessel or tank could propel dangerous shrapnel significant distances. It is important that:
 - vessels or tanks are kept cool, and
 - external fires are extinguished quickly.

Fire Fighters should do the following:

- Fight fire from the maximum distance possible, or use unmanned hose holders or monitor nozzles.
- Cool containers by flooding them with large amounts of water until well after the fire is out.
- Do not direct water at the source of leak or at safety devices; icing may occur.
- Leave the area immediately if you hear a rising sound from venting safety devices or see discoloration of the tank.
- For massive fires, use unmanned hose holders or monitor nozzles; if this is impossible, leave the area and let the fire burn.
- Be aware that when a BLEVE occurs, sections of the tank can fly in any direction. Just avoiding the ends of the tank should not be considered a safe operating procedure.

Always consider your own safety and the safety of people in the immediate area first.

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2.3 MEDICAL EMERGENCY / PERSONAL INJURY

2.3.1 Medical Emergency / Personal Injury Response Actions

SPECIFIC RESPONSE ACTIONS	COMMENTS
General	
Medical emergencies may involve and/or be categorized as follows: <ol style="list-style-type: none"> First Aid - One or more patients with minor injuries which can be effectively managed with the application of routine First 	

<p>Aid. This type of injury does not require medical transport to a hospital, but may require follow-up with a Physician.</p> <p>b. Serious - One or more patients with moderate to serious injuries, requiring response by local Emergency Medical Services (EMS) and may include transport to a hospital for advanced care and treatment.</p> <p>c. Life-Threatening - One or more patients with serious or life-threatening injuries, requiring response by local Emergency Medical Services (EMS) and includes transport to a hospital for advanced care and treatment.</p>	
Assess the scene; protect yourself.	
Summon local Emergency Medical Services (EMS) to the scene; provide information on the nature of injuries and number of injured persons (SECTION 3).	
If trained, provide First Aid/CPR as necessary, until EMS arrives at the scene; injured personnel should not be moved unless the situation is life threatening.	
Initiate Medical Evacuation (via air or ground transport) as recommended by EMS personnel.	
Establish a secure perimeter around the area to prevent unauthorized entry. Initiate the Site Security Plan, as necessary (SECTION 5.6).	
Notify Facility Manager and make appropriate notifications to local emergency agencies if necessary. Make other internal management contacts as appropriate (SECTION 3).	
<p>In case of a fatality (Refer to SECTION 2.7.1):</p> <ul style="list-style-type: none"> • Do not move the victim • Do not release name of victim(s) • Contact local law enforcement • Contact local medical authority • Preserve the accident site • Restrict all communications concerning the incident (do not release names of victims unless authorized) 	
Conduct post-incident activities (SECTION 8).	

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2.4 NATURAL DISASTER / SEVERE WEATHER

2.4.1 Earthquake Procedure

SPECIFIC RESPONSE ACTIONS	COMMENTS
Activate the emergency alarm if available.	
Evacuate personnel from the immediate area to the designated	

assembly area.	
Account for personnel.	
Evaluate the extent of the emergency.	
If time permits, engage emergency shutdown systems and/or manually isolate processes and equipment.	
Notify the Terminal Manager and make other internal notifications as appropriate. (SECTION 3)	
Conduct an inspection for residual safety hazards, such as: <ul style="list-style-type: none"> • Process safety/integrity • Structural damage • Downed power lines • Leaking natural gas, water and sewer lines 	
Arrange for necessary repairs.	
Conduct post-incident activities. (SECTION 8)	

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2.4.2 Flooding Procedure

SPECIFIC RESPONSE ACTIONS	COMMENTS
Account for personnel.	
Notify Facility Manager and make other internal notifications as appropriate. (SECTION 3)	
Evaluate the extent of the emergency.	
Prepare an evacuation plan based upon flood crest and weather forecast.	
Maintain tank levels as appropriate (consider tanks which may float or be should filled with water).	
Secure all loose items in the area that could do harm to other equipment (pipe, tools).	
Engage emergency shutdown systems and/or manually isolate processes and equipment, if necessary.	
Evacuate personnel, as necessary.	
Conduct an inspection for residual safety hazards, such as: <ul style="list-style-type: none"> • Structural damage • Downed power lines • Leaking natural gas, water and sewer lines • Poisonous snakes and other wildlife sheltering in structures, vehicles and furniture • Avoid direct contact with flood water, mud and animal carcasses 	

Arrange for necessary repairs.	
Conduct post-incident activities. (SECTION 8)	

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2.4.3 Hurricane Procedure

SPECIFIC RESPONSE ACTIONS	COMMENTS
Prior to Hurricane Season	
Conduct hurricane awareness training, which includes evacuation routes and asset hurricane procedures.	
Coordinate activities with local and state agencies involved in hurricane preparation (Emergency Access Cards, etc.).	
Communicate recommended Community Evacuation routes.	
Determine disposition of company vehicles during evacuation.	
Each location should maintain current photographs of facilities.	
June 1 - Beginning of Hurricane Season	
Verify the availability of and procure emergency supplies, as necessary: <ul style="list-style-type: none"> • Portable Radios • Plywood, lumber, plastic sheeting or covering • Drinking water • First Aid Kits • Flashlight and batteries • Tools • Emergency non-perishable food item 	
Ensure emergency generators and portable equipment is in good working order and sufficient fuel is available.	
Hurricane entering Gulf of Mexico or Approaching East Coast	
Implement hurricane procedures.	
Identify employees who may volunteer to implement hurricane procedures.	
72 hours prior to hurricane's eye reaching landfall	
Cancel all training and meetings requiring travel to affected areas.	
Designate location for temporary Communication Center.	
Verify contractor contacts and availability.	
All employees shall provide to their supervisor an evacuation location and contact number.	
Each location shall identify a radio frequency which broadcasts emergency weather information.	

Report facility status to Corporate Management.	
---	--

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2.4.3 Hurricane Procedure, Continued

SPECIFIC RESPONSE ACTIONS	COMMENTS
48 hours prior to hurricane's eye reaching landfall	
Implement flex-shift to allow employees to secure personal property.	
Ensure all storage tanks are stabilized.	
Ensure all below ground sumps have been pumped dry.	
Secure all critical documents including electronic data.	
Elevate electrical equipment, sensitive office equipment and documents in the event of high water.	
Report facility status to Corporate Management.	
36 hours prior to hurricane's eye reaching landfall	
Communicate with suppliers and affected customers.	
Report facility status to Corporate Management.	
24 hours prior to hurricane's eye reaching landfall	
Begin shutdown operations.	
Release non-essential personnel.	
Report facility status to Corporate Management.	
12 hours prior to hurricane's eye reaching landfall	
Man Communications Center continuously.	
Report facility status to Corporate Management.	
Post Storm Recovery Procedure	
Initiate facility damage assessment.	
Report facility status to Corporate Management.	
Once access has been granted, the following processes should be surveyed for operational reliability prior to startup:	
<ul style="list-style-type: none"> • Electrical panels and motors • Instrument air system • Emergency Shutdown System • Tank and Vessel foundation and support (possible washouts) • Check for dangerous wildlife and reptiles 	

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2.4.4 Tornado Procedure

SPECIFIC RESPONSE ACTIONS	COMMENTS
Activate the emergency alarm, if available, to alert all personnel.	
Notify and establish communications with the Facility Manager.	
If time permits, engage emergency shutdown systems and/or manually isolate processes and equipment.	
Initiate evacuation procedures, if necessary (SECTION 2.6), to designated storm shelter.	
Account for personnel.	
Make appropriate internal notifications. (SECTION 3)	
Conduct an inspection for residual safety hazards, such as: <ul style="list-style-type: none"> • Process safety/integrity, as necessary • Structural damage • Downed power lines • Leaking natural gas, water and sewer lines 	
Conduct post-critique activities. (SECTION 8)	

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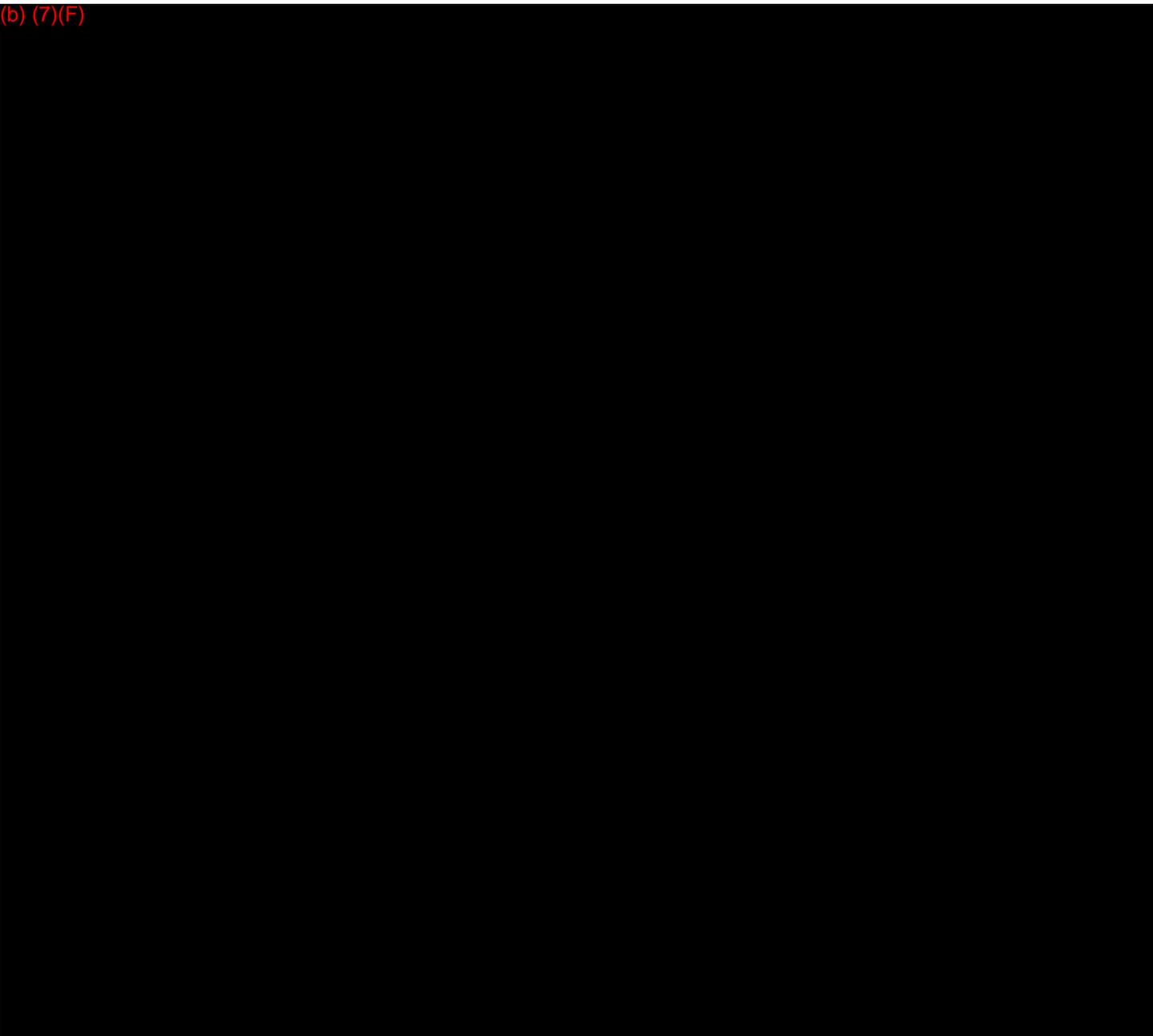
2.5 SECURITY RELATED INCIDENTS

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2.5.1 Threats to Personnel and Facilities

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(b) (7)(F)

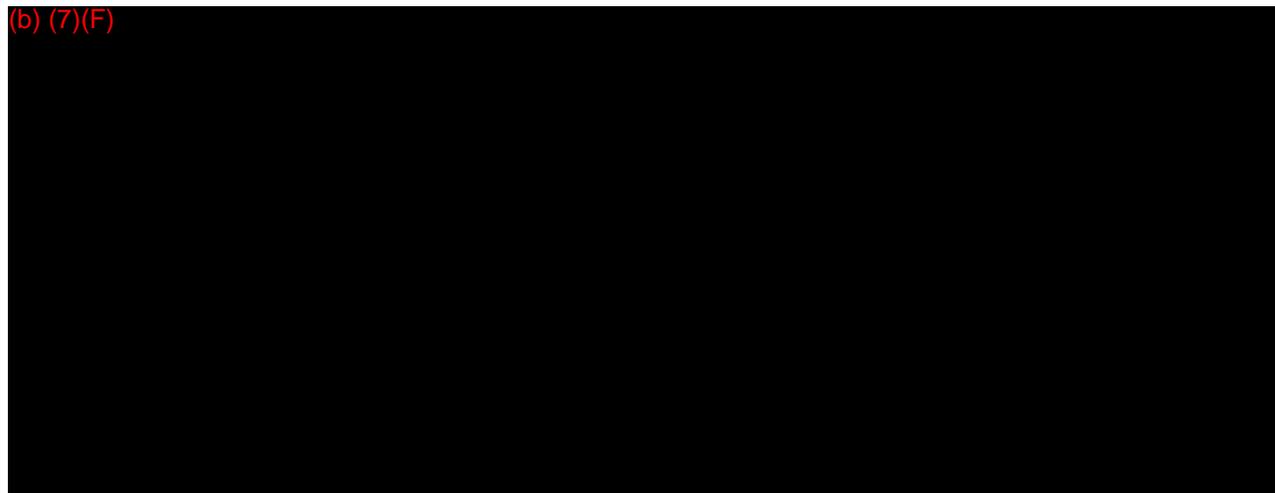


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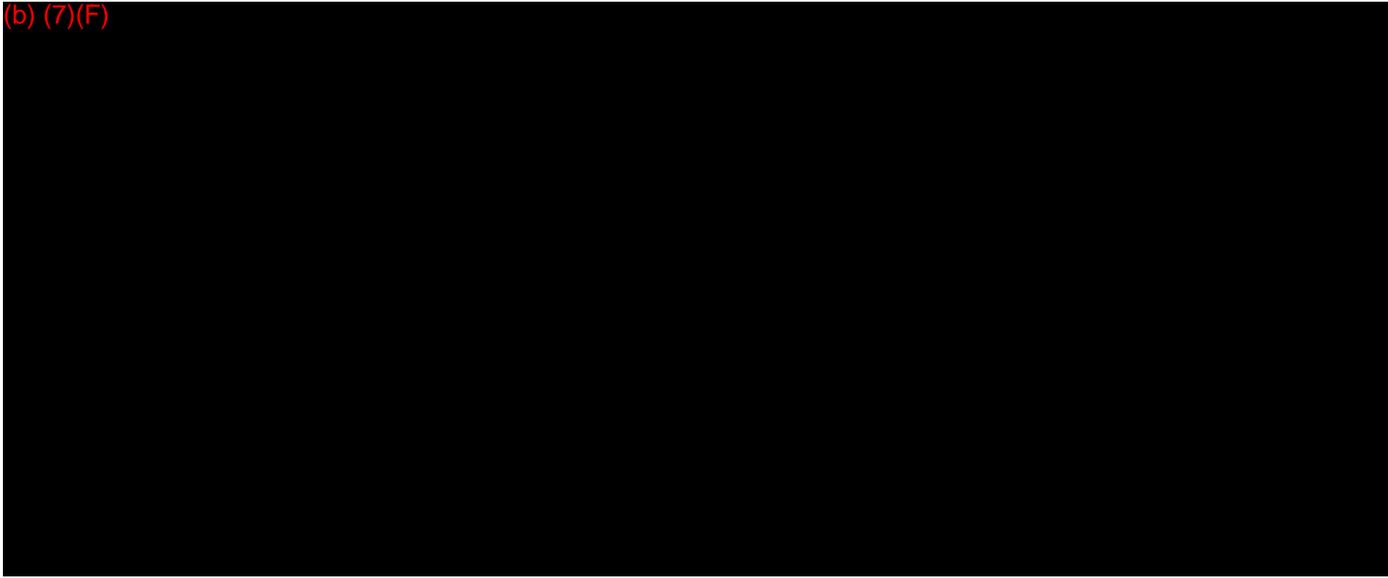
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2.5.1 Threats to Personnel and Facilities, Continued

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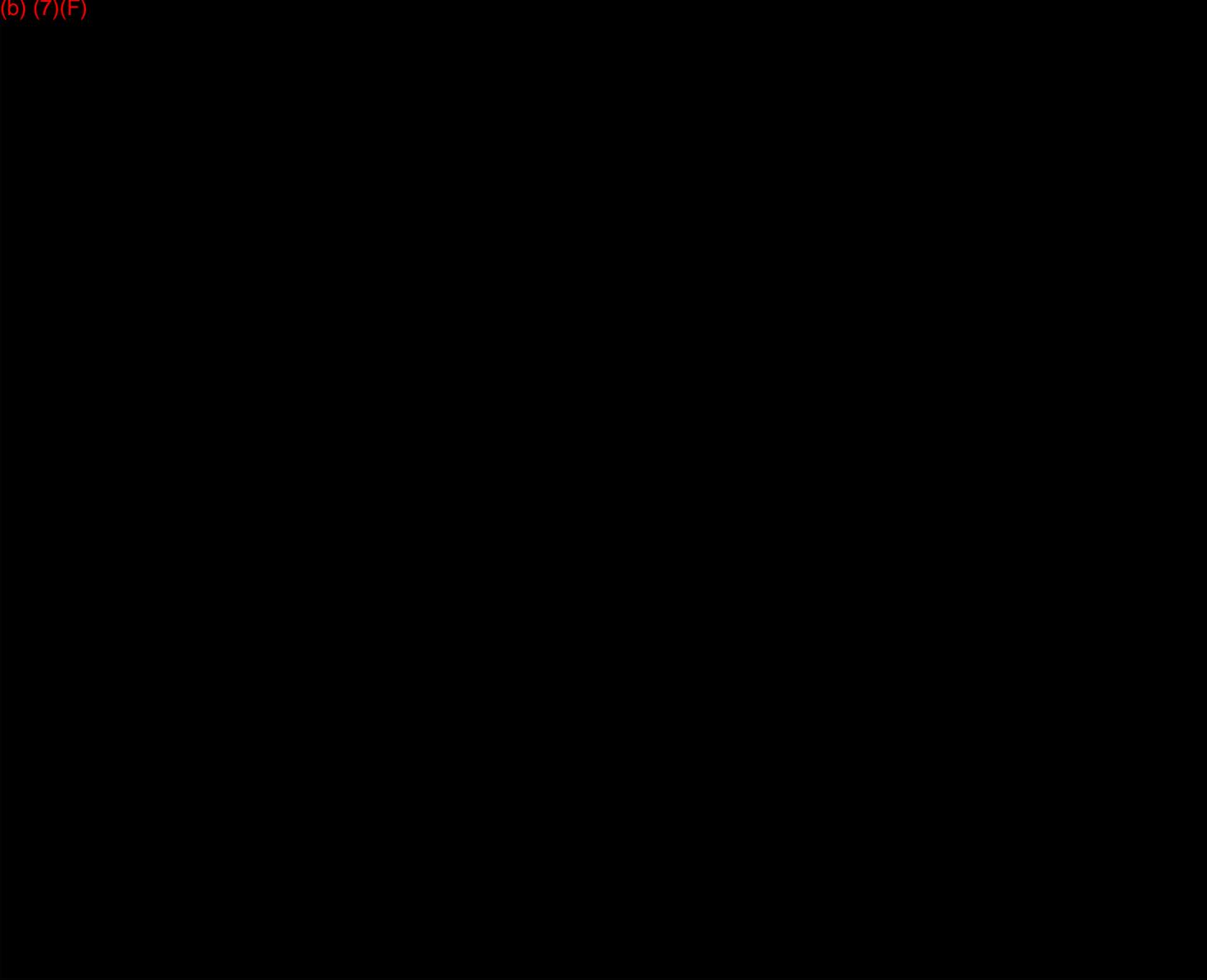
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2.5.2 Criminal Acts / Workplace Violence

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(b) (7)(F)

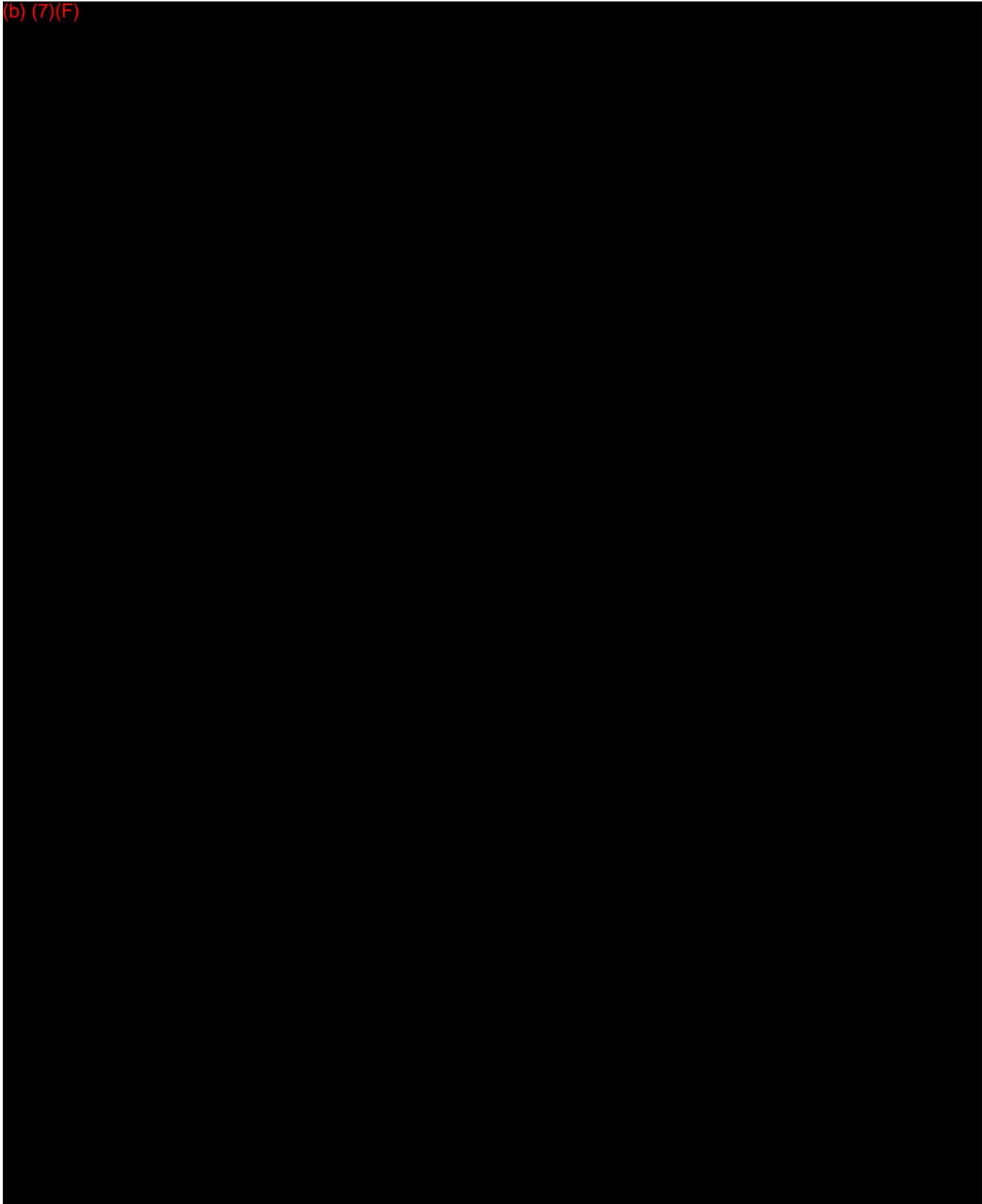
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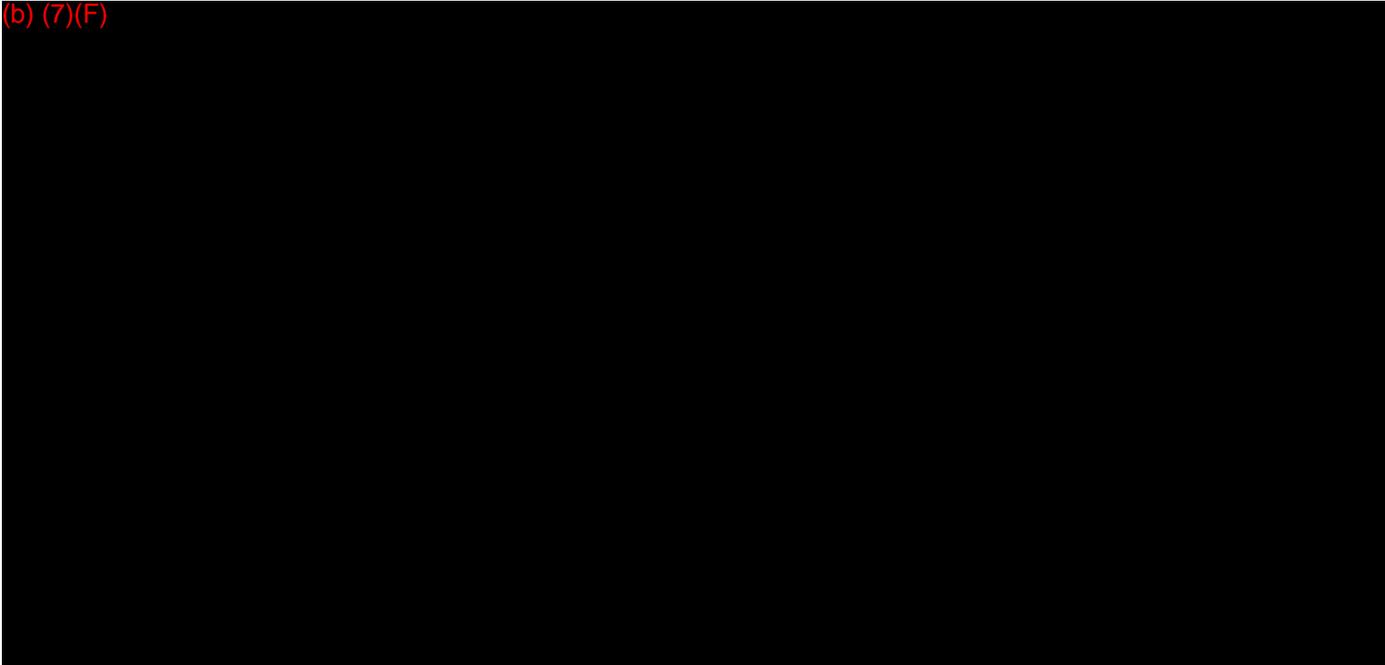
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2.5.3 Sabotage / Bomb Threat / Suspicious Package

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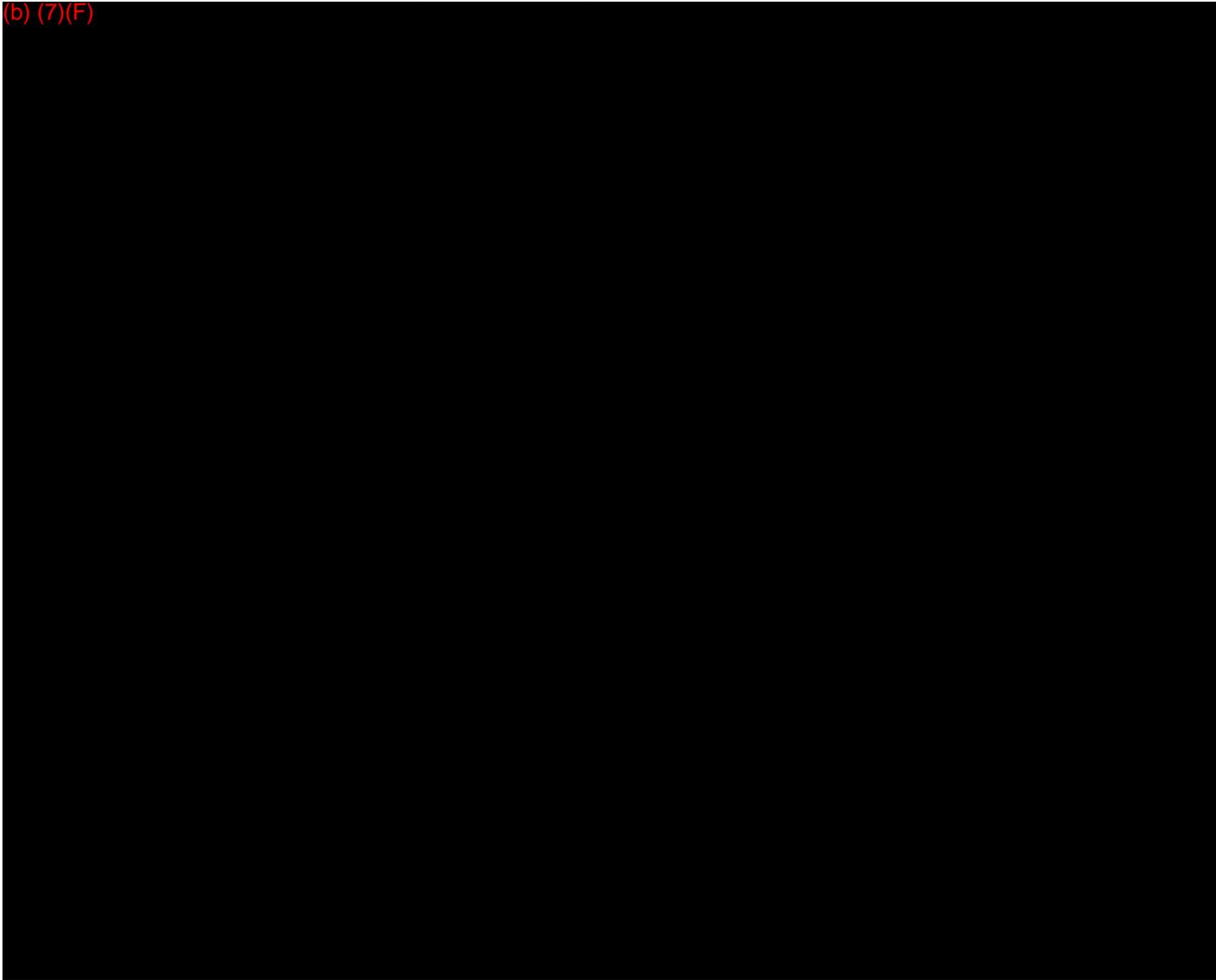
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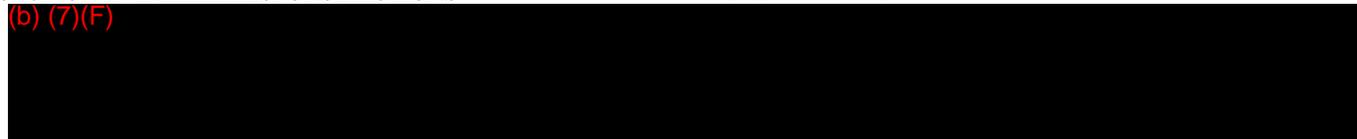
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2.5.3 Sabotage / Bomb Threat / Suspicious Package, Continued

(b) (7)(F)



(b) (7)(F)

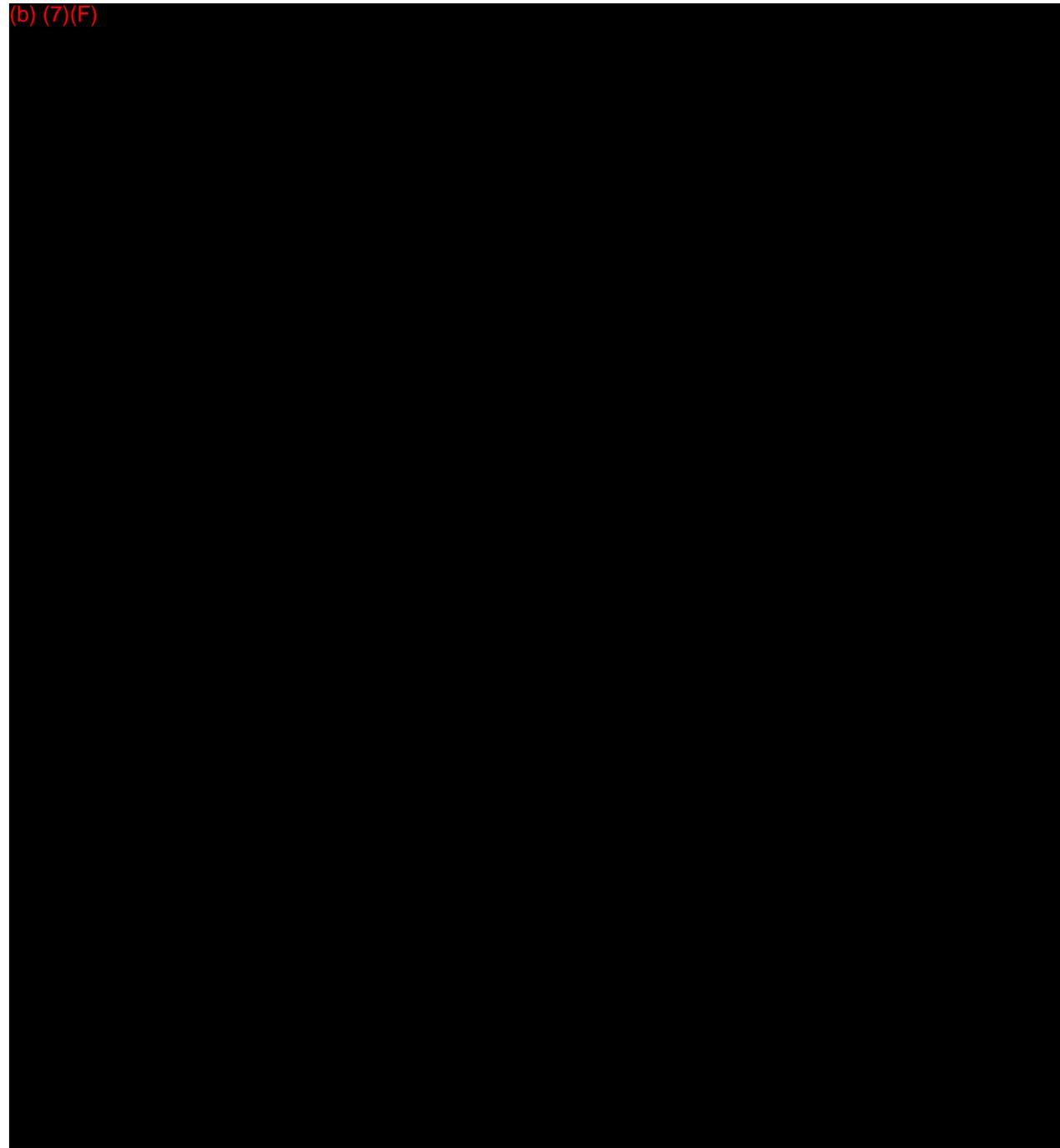


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2.5.4 Threat Receipt Precautions

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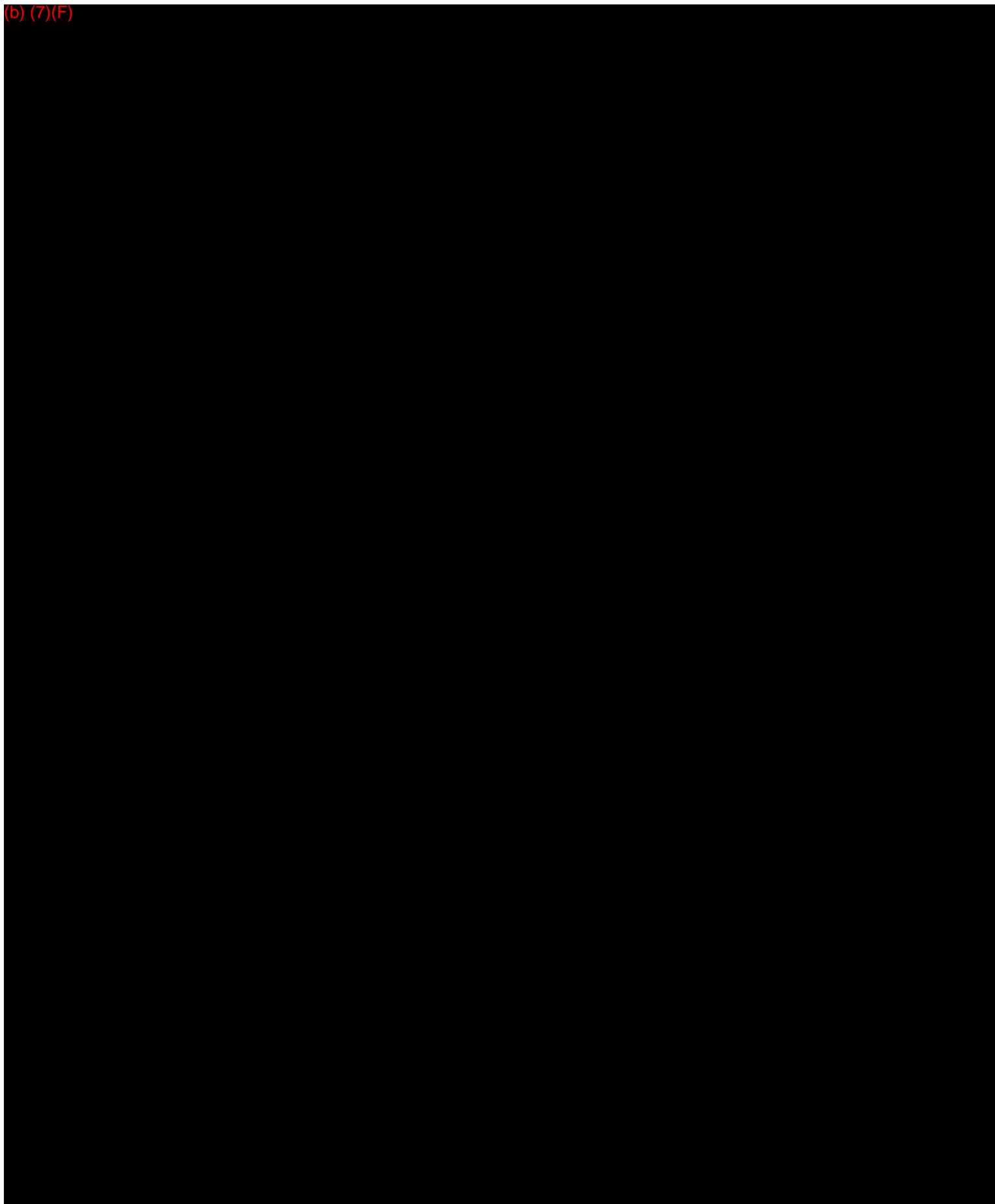
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FIGURE 2.5-1 - THREAT DOCUMENTATION REPORT FORM

(b) (7)(F)



(b) (7)(F)



2.6 EVACUATION

Company employees will be trained on this ERP, and these evacuation procedures herein, as described in **APPENDIX A**. Contractors, visitors and vendors shall be informed of these evacuation procedures upon entering the facility.

2.6.1 Evacuation Alarm

Refer to **FIGURE 2-1** for a description of Facility Alarms.

2.6.2 Critical Operations and Initial Response Actions

When a facility evacuation is initiated, the designated Incident Commander will assess the emergency and determine if any initial response actions should be implemented prior to full evacuation. If it is determined that initial response actions are appropriate to minimize the emergency, the Incident Commander will communicate and coordinate such actions with the designated and properly trained facility personnel. Refer to **FIGURE 2.6-1** Evacuation Procedure Checklist.

If it is possible to do so safely, the following actions will be performed prior to evacuation:

- All product transfer and loading operations will be stopped.
- All Permitted maintenance work will be stopped and associated equipment shutdown or placed in a safe state.
- Safety and/or fire fighting systems will be activated, as appropriate.

2.6.3 Protection Options - Evacuation vs. Shelter In Place

Evacuation (direct avoidance of a hazard) is the preferred option to safeguard personnel during an emergency. However, evacuation may not be the best option for every situation where reaction time may be limited, or other critical factors exist (i.e.; chemical release from nearby industrial facility, tornado, etc.). In these cases Sheltering in Place may be the best alternative to direct exposure to a hazard outdoors.

In all cases, where notification and adequate warning time have been provided, personnel are to evacuate to designated Muster Points to avoid a potential hazard. All shelter in place recommendations will be communicated by the Incident Commander. Refer to **SECTION 2.6.7** for Shelter in Place Guidelines.

2.6.4 Evacuation Routes

All Reasonable Evacuation Routes and Emergency Exits are designated as illustrated in **FIGURE 2.6-2**. Persons shall not evacuate the facility via other routes or exits, unless conditions prevent the safe use of designated evacuation routes or exits. In general, personnel shall not attempt to traverse product transfer areas, or other process areas not intended for foot traffic, during an evacuation.

Before committing to an evacuation route, Personnel should always be aware of the nature and location of the emergency, the location of stored materials (i.e., tanks and piping), hazards imposed by any spilled materials (i.e., flammability and/or inhalation), and the current wind direction (via observation of wind socks or steam vents).

2.6.5 Shelter and Evacuation Muster Point Locations

The designated Shelters and Evacuation Muster Points for this facility are identified in **FIGURE 2.6-2**, and in the table below. Shelter in Place locations are designated inside the facility. Muster Point locations are designated outside of the facility. Shelter and Muster Point locations are also designated as Primary or Secondary. If safe to do so, evacuating personnel should use the Primary site designated for their area, unless emergency conditions dictate that the Secondary location be used.

Upon arrival at a Shelter or Muster Point, personnel shall remain at the location, participate in the Personnel Accountability process, and await further instructions from the Incident Commander or designated person. If the Evacuation Warden is not present at the Shelter or Muster Point, the senior Company employee on-scene shall assume leadership of the group.

SHELTER AND EVACUATION MUSTER POINT LOCATIONS

FACILITY AREA(S)	SHELTER(S)		MUSTER POINT(S)	
	PRIMARY	SECONDARY	PRIMARY	SECONDARY
North Side of Ship Channel	Main Office Southwest Terminal	R. M. Walsdorf Co. Office	Main Office Southwest Terminal	R. M. Walsdorf Co. Office
South Side of Ship Channel	Brownsville Terminal Office	Citgo Petroleum Terminal Office	Brownsville Terminal Office	Citgo Petroleum Terminal Office

2.6.6 Personnel Accountability

Procedures to account for facility personnel following an evacuation are as follows:

- The Qualified Individual shall be responsible for accounting for all employees after an emergency.
- A written report on the head count shall be given to a member of the Incident Management Team.
- The police and/or fire department shall be informed if any person is believed missing.
- Designated employees may try to account for a missing person.? However, at no time during a search shall an employee place himself or someone else at risk.
- The Incident Commander is responsible for completion of the accountability process during an evacuation emergency. The Incident Commander may delegate this responsibility as necessary during an evacuation.
- The Incident Commander (or designee) will account for all Company and contract personnel, as well as visitors and vendors who may be on site, at the Shelter or Muster Point locations.
- The Incident Commander will be immediately notified of any personnel suspected or known to be missing or trapped. The Incident Commander will coordinate any necessary search and rescue efforts with appropriate local response resources. Under no circumstances are Company personnel to initiate search and rescue operations for which they are not properly trained.

- Personnel shall remain at the Shelter or Muster Point location(s) until the "All-Clear" signal, or further instructions, are communicated by the Incident Commander.

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2.6.7 Shelter In Place Guidelines

Shelter in Place Actions

Take Personal Protective Measures, as necessary:

- Respiratory protection - Take Breathing-Air or Escape Paks with you.
- Take portable or personal Detection Monitors with you.

Upon arrival at a Shelter location:

- Secure all sources of ventilation, including air conditioning.
- Secure ventilation ducts.
- Close and lock all windows.
- Close all doors.
- Seal seams and cracks with tape, towels, spare clothing or other available material.
- Secure all potential ignition sources.
- Keep personal Respiratory Protection immediately available.
- Report status to Incident Commander, or local response resources, and monitor emergency communications.

Shelter Location Criteria

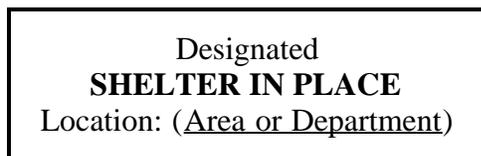
Under extreme circumstances, any shelter (room or building) offers more protection, and is preferable, to direct exposure to a hazard outdoors. However, where possible, preferred shelter locations should be pre-identified. Typically, these will be the most accessible and airtight enclosures immediately available. The following list identifies the best qualities of a good shelter, and is provided only as a general guide in the selection of shelter locations.

- Centrally located and accessible from more than one direction.
- Adequate space available for largest number of persons anticipated.
- Solid construction, wall and ceiling joints and seams intact.
- Few windows, windows are normally closed or can be quickly locked and/or sealed.
- Ventilation ducts can be closed or sealed.
- Equipped with communications (telephone capable of dialing outside facility, and/or radio).
- Will support occupancy for up to four hours.
- Stocked with supply of drinking water.
- Equipped with spare breathing air and/or escape paks (preferred).

- Adjoining restroom available (preferred).

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Where Shelter in Place locations are designated, these locations should be identified with posted signage on the outside of the entrance door, similar to the example provided below.



2.6.8 Public Protective Measures

The Incident Commander will assess the emergency and any potential impact on surrounding communities. If necessary, the Incident Commander will notify local emergency management authorities if public protective measures (Shelter in Place or evacuation) are warranted (contact information is listed in **FIGURE 3.4-1**). Initial isolation and protective action distances will be coordinated with local authorities until the emergency has subsided, and protective action distances will be adjusted accordingly. If community evacuation is warranted, the Local Emergency Planning Committee (LEPC), Fire and/or Police Departments will lead in that effort. The Incident Commander will coordinate with personnel from these organizations, and efforts will be implemented in accordance with any existing city or county evacuation plans.

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FIGURE 2.6-1 - EVACUATION PROCEDURE CHECKLIST

SPECIFIC RESPONSE ACTIONS	COMMENTS
Take personal protective measures (Breathing Air, PPE, etc.).	
Report the emergency to Facility Manager.	
Sound facility Evacuation Alarm (FIGURE 2-1).	
Shutdown operating equipment, secure source of release (if possible), and isolate ignition sources.	
Proceed to the designated Muster Point. If Sheltering in Place is recommended by the Incident Commander, proceed to the designated Shelter location (Refer to SECTION 2.6.7).	
Account for all personnel.	
Establish a secure perimeter around the evacuated area to prevent unauthorized entry.	
Ensure adequate medical care for injured personnel. Initiate medical emergency procedure as required.	
Notify local fire, EMS and law enforcement of the evacuated area, the reason for evacuation, and the location of Muster Points.	

Complete internal notifications, as appropriate. (SECTION 3)	
Assess potential public exposures and initiate protective measures (Shelter in Place or evacuation), with assistance from local law enforcement officials, as necessary.	
Make appropriate government agency notifications. (SECTION 3)	
Conduct post-incident activities. (SECTION 8)	

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FIGURE 2.6-2 - FACILITY SHELTER AND EVACUATION MUSTER POINT PLOT PLAN

[Click here to view Brownsville Terminal Complex Evacuation Plan FIGURE 2.6-2a](#)

[Click here to view Brownsville Terminal Complex Evacuation Plan FIGURE 2.6-2b](#)

[Click here to view Brownsville Terminal Complex Evacuation Plan FIGURE 2.6-2c](#)

[Click here to view Brownsville Terminal Complex Evacuation Plan FIGURE 2.6-2d](#)

[Click here to view Brownsville Terminal Complex Evacuation Plan FIGURE 2.6-2e](#)

[Click here to view Brownsville Terminal Complex Evacuation Plan FIGURE 2.6-2f](#)

[Click here to view Brownsville Terminal Complex Evacuation Plan FIGURE 2.6-2g](#)

[Click here to view Brownsville Terminal Complex Evacuation Plan FIGURE 2.6-2h](#)

[Click here to view Brownsville Terminal Complex Evacuation Plan FIGURE 2.6-2i](#)

[Click here to view Brownsville Terminal Complex Evacuation Plan FIGURE 2.6-2j](#)

SECTION 3

NOTIFICATIONS / TELEPHONE NUMBERS

3.1 Incident Classification

3.2 Internal Notification Procedures

Figure 3.2-1 - Notification Flowchart

Figure 3.2-2 - Internal Incident Report Form

3.3 External Notification Requirements

3.3.1 Reporting Guidelines

Figure 3.3-1 - Regulatory Reporting Requirements

3.4 Notifications and Telephone Numbers

Figure 3.4-1 - Notifications and Telephone Numbers

3.1 INCIDENT CLASSIFICATION

The severity of an Incident will have a bearing on the level of management involvement necessary and the extent of resource mobilization. Normally, initial Incident Command will be assumed by Terminal Management (local IRT), but may evolve to the IMT (corporate team), and/or into a Unified Command situation involving agency representatives. The following definitions provide guidance in the early classification of an incident:

TIER I INCIDENT
<p>Tier I incidents are typically defined as those incidents that can be effectively managed by company responders with no assistance from outside resources.</p> <p>These incidents will typically be "operational" incidents (i.e. valve or flange leaks, etc.) posing no threat to the environment or public. Typically, the IRT (local team) will manage Tier I incidents.</p>
TIER II INCIDENT
<p>Tier II incidents are typically defined as those incidents that can be effectively managed by company personnel with limited to moderate assistance from local, external, non-company resources.</p> <p>These incidents will typically be "serious" incidents with the potential for moderate impact to the environment and/or public. Such incidents may include line leaks, small tank farm releases, etc. Typically, the IRT (local team) will address Tier II incidents with various levels of support and relief from the IMT (corporate team).</p>
TIER III INCIDENT
<p>Tier III incidents are typically defined as those incidents potentially requiring all company response personnel (IRT and IMT) as well as significant assistance from contracted response resources, as well as local, regional, and/or federal resource and agency involvement.</p> <p>These incidents will typically be "catastrophic" events involving the potential for significant damage or harm to the environment and/or public. Incidents of this type may include tank collapse or other catastrophic event. Typically, the IMT (corporate team) will assume incident management with local input and operational support from IRT (local team) members.</p>

3.2 INTERNAL NOTIFICATION PROCEDURES

The Company's internal emergency notification sequence is identified below (Also refer to the Notification Flowchart, **FIGURE 3.2-1**). Internal emergency contacts are contained in **SECTION 3.4**:

First Person Notified/On-Scene

- Immediately notify the Terminal Manager.

Terminal Management (local Incident Commander / Qualified Individual)

- Activate the Incident Response Team (IRT - local team), as the situation demands.
- Activate local emergency response resources (fire, police, medical, Oil Spill Removal Organizations (OSRO), etc.).
- Classify the incident and notify the Incident Management Team (IMT - corporate team) and other external organizations as necessary.
- As time allows, Incident Commander, or designee, will provide IMT with copy of completed Company Incident Report Form (**FIGURE 3.2-2**).
- Coordinate activation of additional response resources (including activation/mobilization of the Corporate Incident Management Team).

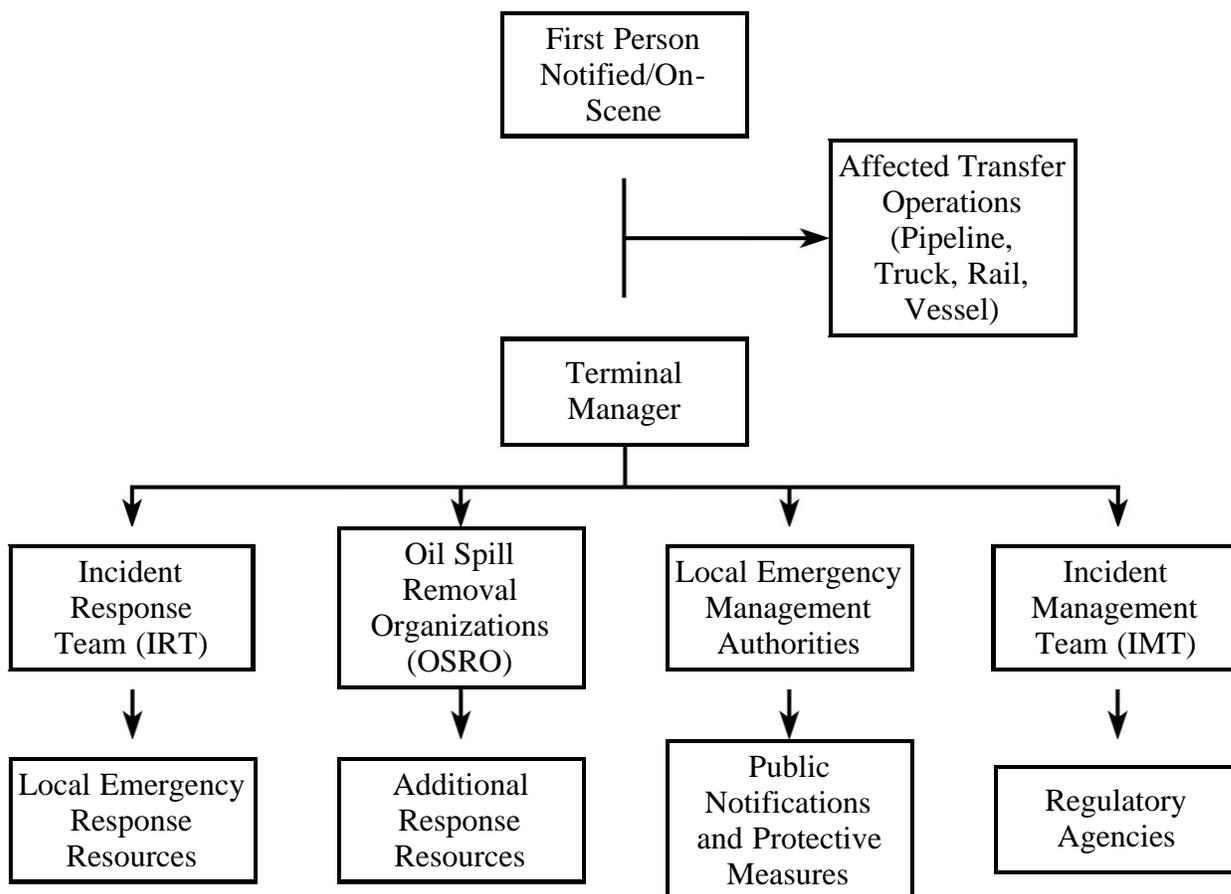
Incident Management Team (IMT Corporate Team)

- Complete all regulatory/governmental notifications, as required.

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FIGURE 3.2-1 - NOTIFICATION FLOWCHART



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FIGURE 3.2-2 - INTERNAL INCIDENT REPORT FORM

INVOLVED PARTIES			
Reporting Party		Suspected Responsible Party	
Name:		Name:	
Phone:?	(Day)	Phone:	(Day)
?	(Evening)		(Evening)
Position:		Company:	
Company:		Organizational Type:	
Address:		<input type="checkbox"/> Private Citizen <input type="checkbox"/> Private Enterprise <input type="checkbox"/> Public Utility <input type="checkbox"/> Local Government <input type="checkbox"/> State Government <input type="checkbox"/> Federal Government	
Person Discovering Incident			
Name:			
Company/Organization:			
City:	State:	Zip:	
Were materials released? <input type="checkbox"/> Yes <input type="checkbox"/> No		Calling for Responsible Party <input type="checkbox"/> Yes <input type="checkbox"/> No	
INCIDENT DESCRIPTION			
Incident Classification: <input type="checkbox"/> Tier I <input type="checkbox"/> Tier II <input type="checkbox"/> Tier III			
Incident Factors (Check all that Apply):			
<input type="checkbox"/> Spill / Release	<input type="checkbox"/> Fire / Explosion / Vapor Release	<input type="checkbox"/> Medical	<input type="checkbox"/> Severe Weather
<input type="checkbox"/> Natural Disaster	<input type="checkbox"/> Security Related	<input type="checkbox"/> Evacuation	<input type="checkbox"/> Other
Date:	Time:	AM / PM	
Incident Address/Location:		Weather:	
		Latitude: _____ degrees _____ min _____ sec N	
		Longitude: _____ degrees _____ min _____ sec W	
Mile Post/River Marker:			
City/County:		Distance from City:	
State:		Direction from City:	
Source and Cause of Incident:			
Storage Tank Type: <input type="checkbox"/> Above Ground <input type="checkbox"/> Below Ground <input type="checkbox"/> Unknown			
Tank Capacity:		Facility Capacity:	
Pipeline Segment:		Milepost:	
MATERIAL INFORMATION			
		Released	Quantity in Water

CHRIS Code	Product Released	Quantity (Include units of measure)	(Include units of measure)

*** INITIAL NOTIFICATION SHOULD NOT BE DELAYED PENDING COLLECTION OF ALL INFORMATION
NATIONAL RESPONSE CENTER (800) 424-8802**

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FIGURE 3.2-2 - INTERNAL INCIDENT REPORT FORM, CONTINUED

INITIAL IMPACT	
Number of injuries:	Number of Deaths:
Were there Evacuations? <input type="checkbox"/> Yes <input type="checkbox"/> No	Number Evacuated:
Was there any Damage? <input type="checkbox"/> Yes <input type="checkbox"/> No	
Damage in dollars (estimate):	
Is the Spill Contained within the boundaries of the facility? <input type="checkbox"/> Yes <input type="checkbox"/> No	
Direction of Flow:	
RESPONSE ACTION(S)	
Action(s) Taken to Correct, Control or Mitigate Incident:	
ADDITIONAL INFORMATION	
Any information about the incident not recorded elsewhere in the report (e.g., duration of spill, treatment or disposal measures):	

COMPLETED NOTIFICATIONS			
Local	State	Federal	Other

*** INITIAL NOTIFICATION SHOULD NOT BE DELAYED PENDING COLLECTION OF ALL INFORMATION NATIONAL RESPONSE CENTER (800) 424-8802**

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3.3?EXTERNAL NOTIFICATION REQUIREMENTS

The following external notifications (**FIGURE 3.3-1**) should be made in accordance with federal, state, and local regulations for all reportable incidents/discharges.?The "Internal Incident Report Form" (**FIGURE 3.2-2**) should be used to facilitate documentation and data retrieval for these notifications.?Terminal Management shall ensure that the following Notifications are made as the situation demands, in consultation with Corporate ESOH. Regulatory contact numbers are contained in **SECTION 3.4**?

3.3.1 Reporting Guidelines

- Never include information which has not been verified.
- Never speculate as to the cause of an incident or make any acknowledgment of liability.
- Always Document:
 - Agency notified
 - Person notified
 - Time agency notified
 - Content of message given
- DO NOT DELAY reporting due to incomplete information.

FIGURE 3.3-1 - REGULATORY REPORTING REQUIREMENTS

The applicable regulatory notifications for this facility are as follows.

<p>Oil Spill Removal Organization (OSRO)</p> <p>Immediately for all spills that exceed the Facility's and other local response capabilities.? FIGURE 7.1-1 details the OSRO response resources with their respective response times and FIGURE 3.4-1 details the OSRO phone references for 24 hour contact.</p>
<p>National Response Center (NRC)</p> <p>Verbal: Immediately for all spills that impact or threaten navigable water.</p> <p>Written: A written accident report will be filed within 30 days following an accident on DOT form 7000-1 in accordance with Sec. 195.50 of the U.S. Code of Federal Regulations 49 CFR. If any changes to the information reported or additions to the original report on the DOT form 7000-1 a supplemental report will be filed within 30 days.</p> <p>In accordance with the applicable SPCC regulations, within 60 days to the U.S. Environmental Protection Agency for a spill in excess of 1,000 gallons (24 Bbls.) in a single event or two spill events within a twelve month period into or upon navigable waters of the United States or adjoining shorelines.</p> <p>U.S. DOT Office of Pipeline Safety 400 Seventh Street, S.W., Room 7128 Washington, D.C. 20590</p> <p>U.S. Environmental Protection Agency - Region 4 Emergency Response and Removal Branch Attn: On-Scene Coordinator 61 Forsyth Street, SW Atlanta, Georgia 30303-8909</p> <p>U.S. Environmental Protection Agency - Region 6 Emergency Response and Removal Branch Attn: On-Scene Coordinator 1445 Ross Avenue Dallas, TX 75202-2733</p>
<p>Texas General Land Office (GLO)</p> <p>Verbal: Any spills into coastal waters. Any spills at terminal facilities.</p> <p>Written: As requested by the agency.</p> <p>Texas General Land Office</p>

2145 EMS Lane
Brownsville, TX 778521

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FIGURE 3.3-1 - REGULATORY REPORTING REQUIREMENTS, CONTINUED

The applicable regulatory notifications for this facility are as follows.

Texas Commission on Environmental Quality [TCEQ] (Austin, TX)
Verbal: Any spills onto land or into state waters.
Written: As requested by the agency.
Texas Commission on Environmental Quality [TCEQ] Austin, TX?
Brownsville Navigation District [BND] (Port of Brownsville)
Verbal: Any spills onto BND land or into the Ship Channel return
Written: As requested by the BND or pertaining to Reportable Quantities for hazardous substances.
Brownsville Navigation District [BND] (Port of Brownsville) Attn: Deputy Port Director 1000 Foust Road Brownsville, TX 778521
Local Emergency Planning Committee (LEPC)
Verbal: For any spill which escapes the boundary of the Facility. Cameron County (LEPC)
Occupational Safety and Health Administration (OSHA)
Immediately for incidents involving three (3) or more hospitalizations or one (1) or more deaths. In those cases that demand a response to OSHA regulation, Form 101 shall be completed, and Form 200 shall be posted annually.
U.S. Environmental Protection Agency (EPA)
Immediately for all spills that impact or threaten navigable water or adjoining shoreline. Notification to the EPA is typically accomplished by the call to the NRC.
US Fish and Wildlife Service (USFWS)
Immediately for Wildlife Protection/Rehabilitation
Local Emergency Services

Immediately for all Police, Fire, and Medical Emergencies

Police Department

Fire Department

Ambulance Service

Wildlife Rehabilitation Resources

Neighbors

Directly or with assistance from local police and fire agencies and/or the Port Authority, inform all adjacent businesses and private citizens that might be immediately impacted.

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3.4 NOTIFICATIONS AND TELEPHONE NUMBERS

FIGURE 3.4-1 - NOTIFICATIONS AND TELEPHONE NUMBERS

*24 Hour Number

AFFILIATION	PHONE NUMBER	TIME CONTACTED
A. COMPANY PERSONNEL		
Terminal Personnel		
Kevin Garcia General Manager- Brownsville TX	(956) 831-3531 (Office) (b) (6) (956) 371-3916* (Mobile)	
Carlos Arizmendi Operations Manager- Brownsville TX	(956) 831-3531 (Office) (956) 592-1660* (Mobile)	
Melchor "Malcom" Casas Area Safety Coordinator	(956) 554-4036 (Office) (b) (6) (956) 371-7748* (Mobile)	
Corporate IMT Personnel		
Ed Luebke Vice President, Pipeline Operations- Atlanta Office	(770) 518-3586 (956) 831-3531 (Office) (b) (6) (678) 772-1285* (Mobile)	
Andy McClish Manager, Reg. Compliance- Atlanta Office	(770) 518-3701 (Office) (b) (6) (678) 488-4524* (Mobile)	
Jim Dugan Sr. Vice President, Operations & Engineering- Atlanta Office	(770) 518-3760 (Office) (b) (6) (678) 427-9321* (Mobile)	
Brian Temples Director, Safety- Atlanta Office	(770) 518-3756 (Office) (706) 252-0282* (Mobile)	
Karl Bernard Director, Operations- Atlanta Office	(770) 518-3655 (Office) (b) (6) (954) 931-7194* (Mobile)	

Jim Sligh Environmental Specialist- Atlanta Office	(770) 518-3662 (Office) (b) (6) (404) 867-6395* (Mobile)	
Tommy Jordan Director, Operations- Atlanta Office	(770) 518-3588 (Office) (b) (6) (678) 427-9325* (Mobile)	
Doug Hall Director, Reg. Compliance- Denver Office	(303) 626-8218 (Office) (b) (6) (720) 201-0964* (Mobile)	

For further guidance, refer to the current version of the TransMontaigne *Internal Notification Procedure* (located on the SAP Portal).

Refer to **APPENDIX A, FIGURE A.2-3** for personnel training records

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3.4 NOTIFICATIONS AND TELEPHONE NUMBERS , CONTINUED

FIGURE 3.4-1 - NOTIFICATIONS AND TELEPHONE NUMBERS , CONTINUED

*24 Hour Number

AFFILIATION	PHONE NUMBER	TIME CONTACTED
A. COMPANY PERSONNEL		
Corporate IMT Personnel		
Steve McNelly General Mgr., Operations- Atlanta Office	(770) 518-3753 (Office) (b) (6) (678) 910-1510* (Mobile)	
Dudley Tarlton Vice President, ESOH- Denver Office	(303) 626-8200 [8219] (Office) (b) (6) (720) 308-8596* (Mobile)	
Greg Pound President, C.O.O. - Atlanta Office	(770) 518-3707 (Office) (b) (6) (404) 386-5426* (Mobile)	
Cliff Zapp Director, QA/QC- Atlanta Office	(770) 518-3821 (Office) (b) (6) (770) 335-5898* (Mobile)	
Pipeline/SCADA Control Center Operator On Duty- Atlanta Office	(800) 732-8140* (Office)	

For further guidance, refer to the current version of the TransMontaigne *Internal Notification Procedure* (located on the SAP Portal).

Refer to **APPENDIX A, FIGURE A.2-3** for personnel training records

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FIGURE 3.4-1 - NOTIFICATIONS AND TELEPHONE NUMBERS, CONTINUED

*24 Hour Number

AFFILIATION	PHONE NUMBER	TIME CONTACTED
Initial		
National Response Center (Washington DC)	(800) 424-8802* (202) 267-2675* (202) 267-2180	
Cameron County (LEPC)	(956) 547-7000 (956) 547-7006	
Texas General Land Office [GLO] / Commission on Environmental Quality [TCEQ] (Austin TX)	(800) 832-8224*	
Texas General Land Office- GLO (Corpus Christi TX))	(800) 832-8224* (361) 549-5310* (956) 504-1417	
Recommended		
Federal Agency(s)		
OSHA [reportable injury or death] (Washington DC)	(800) 321-6742*	
U.S. Fish and Wildlife Service (Houston TX)	(281) 286-8282	
US EPA Regional Office- Region 6 (Dallas TX)	(866) 372-7745* (214) 665-2200	
USCG Captain of the Port (Brownsville MSO) 2993 N. Indiana Ave., Ste. A, Brownsville, TX 78521	(956) 832-0517* (956) 832-0743 (fax)	
USCG Captain of the Port (Corpus Christi MSO) 555 N. Carancahua, Ste. 500, Corpus Christi, TX 78478	(361) 888-3162 (800) 434-9486 (361) 888-3231 (fax)	
State Agency(s)		
Texas Parks & Wildlife Department (Austin TX)	(512) 389-4726 (512) 389-4848*	
Texas Railroad Commission	(512) 463-6788* (Austin TX) (713) 869-5001 (361) 242-3113	
Local Agency(s)		
Brownsville City Hall	(956) 548-6000	

Brownsville City Manager	(956) 548-6008	
Brownsville Navigation District- Port of Brownsville	(956) 831-8256* (956) 831-4592*	

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FIGURE 3.4-1 - NOTIFICATIONS AND TELEPHONE NUMBERS, CONTINUED

*24 Hour Number

AFFILIATION	PHONE NUMBER	TIME CONTACTED
Local Agency(s)		
Harbormaster's Office- Port of Brownsville	(956) 831-8256*	
Highway Department	(956) 542-2260	
Fire Department(s)		
Fire Chief	911*	
Fire Department	911* (956) 546-3195	
Emergency Medical Service(s)		
Harlingen Medical Center	(956) 389-1000	
Valley Baptist Medical Center (Brownsville)	(956) 698-5400*	
Valley Baptist Medical Center (Harlingen)	(956) 389-1100	
Valley Regional Medical Center/Ambulance Service (Brownsville)	911* (956) 350-7000*	
Police Department(s)		
Brownsville Police Dept. 600 E. Jackson St., Brownsville, TX 78520	911* (956) 548-7000*	
Cameron County Sherriff's Dept. 7300 Old Alice, Olmito, TX 78575	911* (956) 544-0860*	
Texas State Highway Patrol (McAllen TX)	(956) 984-5608 (956) 984-5621*	
Other Service Provider(s)		

AON Risk Service (Insurance Claims)	(832) 476-6000 (832) 476-6990 (847) 953-6806	
Cardno ENTRIX (NRDA issues- Houston TX)	(713) 666-6223 (800) 368-7511	
Chemtrec/Chemical Referral Center (Washington DC)	(800) 424-9300* (800) 262-8200*	

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FIGURE 3.4-1 - NOTIFICATIONS AND TELEPHONE NUMBERS, CONTINUED

*24 Hour Number

AFFILIATION	PHONE NUMBER	TIME CONTACTED
Other Service Provider(s)		
International Bird Rescue Center (Fairfield CA)	(707) 207-0380 (888) 447-1743	
Marine Services (Port Isabel TX)	(956) 943-5041*	
Miller Environmental Services- Spill Response (Corpus Christi TX)	(800) 929-7227* (361) 289-9800	
Tri-State Bird Rescue/ Research (Newark DE)	(302) 737-9543 (800) 710-0695* (Pgr)	
U.S. Humane Society (Washington DC)	(202) 452-1100	
Wildlife Rehab. & Education (Houston TX)	(713) 861-9453 [Main] (281) 332-8319 [Director] (832) 654-0856 [Oil Response] (281) 731-8826 [Oil Response]	
Witt-O'Brien's - Crisis Management (New Orleans/ Houston)	(985) 781-0804* (281) 320-9796*	
Weather Information		
Brownsville Weather Office	(956) 546-5377 (956) 546-5378	
Television Station(s)		
KGBT-TV, Channel 4 - CBS	(956) 541-5822 (956) 546-2233 (fax)	
KLUJ-TV, Channel 44 - TBN	(956) 425-4225	

	(956) 412-1740 (fax)	
KMBH-TV, Channel 60 - PBS	(956) 421-4111 (956) 421-4150	
KRGV-TV, Channel 5 - ABC	(956) 428-5555 (956) 973-5002	
KVEO-TV, Channel 23 - UPN	(956) 544-2323 (956) 544-4636 (fax)	
Radio Station(s)		
KBNR Radio - 88.3 FM	(956) 542-6933 (956) 542-0523	
Brownsville Terminal Complex September 2004		
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FIGURE 3.4-1 - NOTIFICATIONS AND TELEPHONE NUMBERS, CONTINUED

*24 Hour Number

AFFILIATION	PHONE NUMBER	TIME CONTACTED
Radio Station(s)		
KGBT Radio - 1530 AM; 98.5 FM	(956) 631-5499 (956) 631-0090 (fax)	
KHID Radio - 88.1 FM; KMBH Radio - 88.9 FM	(956) 421-4111 (956) 421-4150 (fax)	
KTEX Radio - 100.3 FM	(866) 973-1041 (965) 421-2582 (fax)	
KZSP Radio - 95.3 FM; KESO Radio - 92.7 FM	(956) 761-2270 (956) 761-1656	
Newspaper(s)		
Brownsville Herald	(956) 542-4301 (956) 542-0840	
The Monitor	(956) 686-4343	
Valley Morning Star	(956) 423-5511 (956) 430-6233	
Neighboring Business(s)		
A Clean Portaco (adjacent facility- Southwest, N. Side)	(956) 831-5262	

Citgo Terminal (adjacent facility- South, S. Side)	(956) 831-8241	
Interlube Corp (adjacent facility- East, N. Side)	(956) 831-4046	
Port of Brownsville Recycling (adjacent facility- West, N. Side)	(956) 831-6707	
RTW Terminal (adjacent facility- East, N. Side)	(956) 831-7117	
Signet Maritime Corp. (adjacent facility- West, N. Side)	(936) 838-6800	
US Clay & Minerals (adjacent facility- West, S. side)	(956) 831-8140	

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FIGURE 3.4-1 - NOTIFICATIONS AND TELEPHONE NUMBERS, CONTINUED

*24 Hour Number

AFFILIATION	PHONE NUMBER	TIME CONTACTED
Waste Disposal / Recycle Facilities		
Aaron Oil Co., Inc. (Saraland AL)	(800) 239-4549 (251) 479-1616	
Allied Energy Corporation (Birmingham AL)	(205) 925-6600* (877) 713-7515	
BFI Waste Systems (Jackson MS)	(800) 523-6437	
BFI Waste Systems (LeLand, MS)	(662) 335-1014	
USCG Classified OSRO's		
Garner Environmental Services, Inc. Deer Park, TX	(281) 930-1200 (800) 424-1716*	
Oil Mop, LLC Pasadena, TX	(713) 534-7300 (800) 645-6671*	
U.S. Environmental Services, LLC Laredo, TX	(877) 398-9911 (888) 279-9930*	
SWS Environmental Services Cibolo, TX	(210) 566-8366 (877) 742-4215*	
TAS Environmental Services, LP	(210) 496-5310 (888) 654-0111*	

San Antonio, TX		
Non-Classified OSRO's		
R.M. Walsdorf Brownsville, TX	(956) 831-3984 (956) 592-1624*	
Chemical Response & Remediation Harlingen, TX	(866) 437-2772* (956) 365-4252	
Aerial Surveillance Resources		
Barr Air Patrol 1442 Airport Blvd, Ste. 11 Mesquite, TX	(972) 222-0229	
Gulf Aviation 5001 Bodenhamer Ave. Harlingen, TX	(956) 423-7317	
Southmost Aviation, Inc. 973 S. Minnesota Ave. Brownsville, TX	(956) 542-5852	

SECTION 4

RESPONSE TEAM ORGANIZATION

4.1 Response Team Description

4.2 Activation Procedures

4.3 Team Member Response Times

4.4 Unified Command System

4.5 Qualified Individual (QI)

Figure 4-1 - Response Team Activation Procedure

Figure 4-2 - Response Team Organizational Chart

4.6 Response Team Job Description Checklists

4.6.1 Incident Command Job Description Checklist

4.6.2 Information Officer Job Description Checklist

4.6.3 Safety Officer Job Description Checklist

4.6.4 Liaison Officer Job Description Checklist

4.6.5 Legal Officer Job Description Checklist

4.6.6 Operations Section Chief Job Description Checklist

4.6.7 Planning Section Chief Job Description Checklist

4.6.8 Logistics Section Chief Job Description Checklist

4.6.9 Finance Section Chief Job Description Checklist

4.1 RESPONSE TEAM DESCRIPTION

The Company has developed its emergency response organization around the Incident Command System (ICS), which provides the structure for effective management of response resources. The response team is activated and mobilized in accordance with the size and complexity of the Incident. The Company's emergency response structure is based on a two-tiered organization. The first tier is the Incident Response Team (IRT), comprised of local facility personnel. The second tier is the Incident Management Team (IMT), comprised of corporate personnel. When activated, some positions on the IMT may be filled by local facility personnel.

- **Incident Response Team (IRT)**

The IRT is comprised of local, on-site company personnel, who are responsible for initial response to Tier I, II, or III incidents (refer to **SECTION 3.1**). The IRT includes a Qualified Individual and Incident Commander, Command Staff and Section Chief positions.

- **Incident Management Team (IMT)**

The IMT is comprised of corporate personnel, who are responsible for support and incident management of Tier II, or III incidents (refer to **SECTION 3.1**). The IMT includes a Qualified Individual and Incident Commander, Command Staff and Section Chief positions.

Response team contacts are listed in **FIGURE 3.4-1**. Job descriptions for each team member are provided in **SECTION 4.6**. Response team training is contained in **APPENDIX A**.

4.2 ACTIVATION PROCEDURES

Activation of the response team organization may be accomplished in stages as illustrated in **FIGURE 4-1** and described below:

- First Person notified/on-scene notifies Facility Manager/Qualified Individual.
- Facility Manager/Qualified Individual assumes role of IRT Incident Commander (IC).
- IC activates local IRT positions, as necessary.
- IC classifies incident, and determines if IMT activation is necessary.
- IC notifies IMT Incident Commander.
- IMT IC notifies Section Chiefs and Command Staff.
- IMT Section Chiefs and Command Staff notify necessary personnel.
- IMT mobilizes to incident location.
- IRT IC briefs IMT upon arrival at Command Post.
- IMT IC assumes command.
- IC and Section Chiefs continually assess staffing needs.
- IC activates additional IMT personnel, if needed.
- IC de-activates IMT personnel that are not needed.

4.3 TEAM MEMBER RESPONSE TIMES

The IMT including the IC will report to the Corporate EOC (Atlanta Office) initially.

IRT will mobilize to the facility command post with an expected maximum arrival time of 1-2 hours.

4.4 UNIFIED COMMAND SYSTEM

The Unified Command System (UCS) is the accepted method for organizing regulatory entities within the Incident Command System. The primary entities include:

- Federal On-Scene Coordinator
- State On-Scene Coordinator
- Company Incident Commander (Responsible Party IC)

These three persons 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 and integrated Incident Management Team.

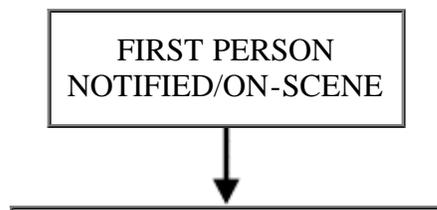
4.5 QUALIFIED INDIVIDUAL (QI)

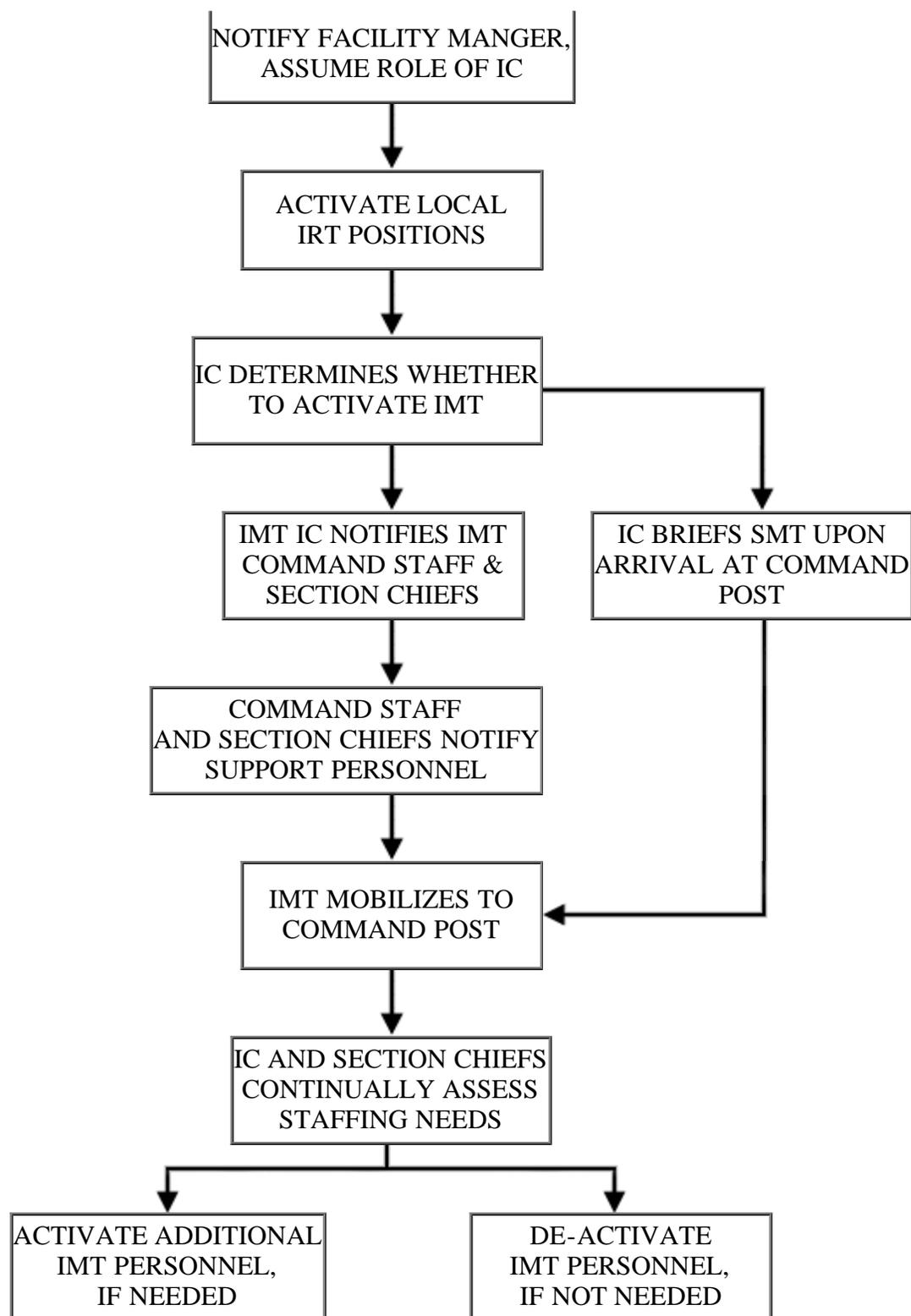
The QI and or designated alternate has the following responsibilities and authorities as required by the Oil Pollution Act of 1990 (40 CFR Parts 9 and 112):

- Be available on a 24-hour basis and able to arrive at the facility in a reasonable time
- Reside in the United States, speak fluent English, and be familiar with the implementation of this Plan
- Activate internal alarms and hazard communication systems to notify all appropriate personnel
- Notify all response personnel as needed
- Identify character, exact source, amount and extent of the release and other necessary items needed for notifications
- Notify and provide information to appropriate Federal, State and Local authorities
- Assess the interaction of the spilled substance with water and/or other substances stored at the Facility and notify on-scene response personnel of assessment
- Assess possible hazards to human health and the environment
- Coordinate rescue and response actions
- Assess and implement prompt removal actions
- Access company funds to initiate cleanup activities; i.e., activate and contract with OSRO's
- Direct cleanup activities until properly relieved of responsibility or incident is terminated

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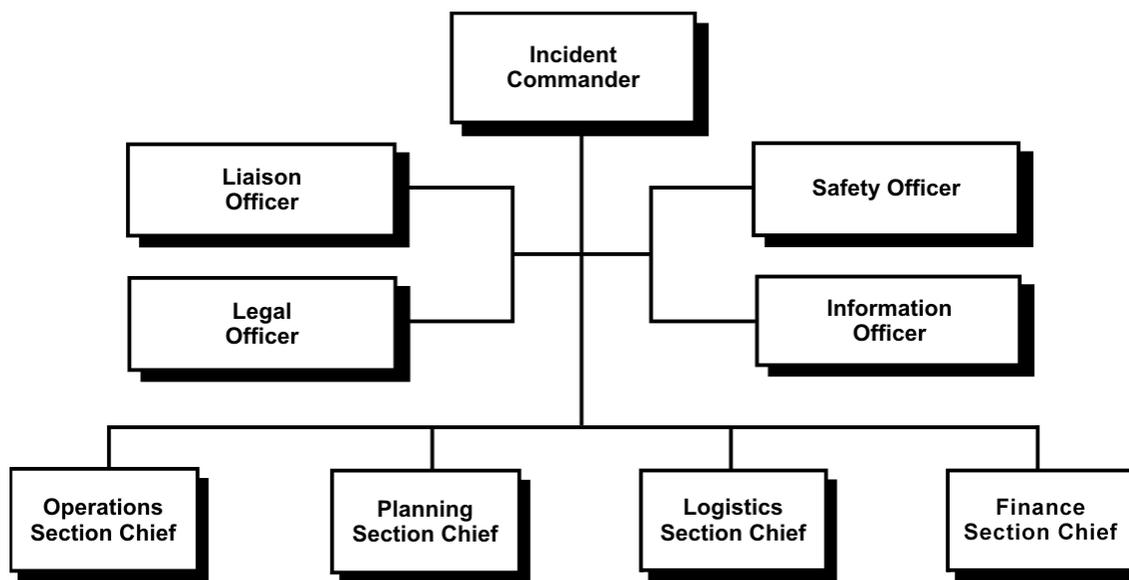
FIGURE 4-1 - RESPONSE TEAM ACTIVATION PROCEDURE





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FIGURE 4-2 - RESPONSE TEAM ORGANIZATIONAL CHART



Note: Refer to **FIGURE 3.4-1** for IRT/IMT Team Member contacts

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4.6 RESPONSE TEAM JOB DESCRIPTION CHECKLISTS

The following job description checklists are intended to be used as a tool to assist IRT/IMT members in their particular positions within the Incident Command System (ICS).

4.6.1 Incident Commander

4.6.2 Information Officer

4.6.3 Safety Officer

4.6.4 Liaison Officer

4.6.5 Legal Officer

4.6.6 Operations Section Chief

4.6.7 Planning Section Chief

4.6.8 Logistics Section Chief

4.6.9 Finance Section Chief

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4.6.1 Incident Commander Job Description Checklist

For oil discharges, the **Incident Commander** will be organized within the Unified Command structure which includes, but is not limited to:

- The predesignated Federal On Scene Coordinator (FOSC) acting under the authority of the National Contingency Plan (NCP)
- The predesignated State On Scene Coordinator (SOSC) representing state and local response agencies
- The representation of the Responsible Party (RP)

The Unified Command is responsible for the overall management of the incident. The Unified Command directs incident activities including the development and implementation of strategic decisions and approves the ordering and releasing of resources. The Unified Command may activate Deputy Incident Commanders to assist in carrying out Incident Command responsibilities.

INCIDENT COMMANDER	COMMENT
Assume Command. Assess the situation and/or obtain incident briefing from prior Incident Commander.	
Establish an Incident Command Post.	
Activate additional IRT personnel, as necessary.	
Request additional response resources, as necessary.	
Classify the incident, and complete internal notifications.	
Determine Incident Objectives and Strategies in accordance with Area Contingency Plan(s) (ACP).	
Establish the immediate priorities.	
Brief Command Staff and Section Chiefs.	
Coordinate regulatory notification with Corporate ESOH Department.	
Ensure Planning Meetings are scheduled as required.	
Approve and authorize the implementation of an Incident Action Plan.	
Determine information needs and advise Command and General Staff.	
Coordinate activity for all Command and General Staff.	
Manage incident operations.	
Approve requests for additional resources and requests for release of resources.	
Approve the use of trainees, volunteers and auxiliary personnel.	
Authorize release of information to news media.	
Ensure incident funding is available.	
Notify Natural Resource Damage Assessment (NRDA) and coordinate NRDA Team.	
Coordinate incident investigation responsibilities.	
Seek appropriate legal counsel.	

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4.6.1 Incident Commander Job Description Checklist, Continued

INCIDENT COMMANDER	COMMENT
Order demobilization of the incident when appropriate.	
Ensure completion of final incident documentation and reports.	
Coordinate Post Incident Review.	

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4.6.2 Information Officer Job Description Checklist

The **Information Officer**, a member of the Command Staff, is responsible for developing information about the incident for release to the news media, to incident personnel, and to other appropriate agencies and organizations.

Only one Information Officer will be assigned for each incident, including incidents operating within Unified Command or multi-jurisdictional incidents. The Information Officer may have assistants as necessary and the assistants may also represent assisting agencies or jurisdictions if warranted.

INFORMATION OFFICER	COMMENT
Review the Company's <i>News Media Inquiry Policy</i> * and consult with the Incident Commander to identify specific guidance and limitations governing the release of information.	
Develop material for use in media briefings.	
Obtain approval from Incident Commander and designated Company personnel for media releases.	
Assist designated Company personnel in coordinating media interviews, briefings, and/or tours as necessary.	
Obtain media information that may be useful to incident planning.	
Maintain current information summaries and/or displays of the incident and provide information on the status of the incident to incident personnel.	
Participate in Post Incident Review.	

*The current version of this document is available on the Company's SAP Portal (Documents/Public Documents/ESOH).

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4.6.3 Safety Officer Job Description Checklist

The **Safety Officer**, a member of the Command Staff, is responsible for monitoring and assessing hazardous and unsafe situations and developing measures for assuring personnel safety. The Safety Officer will correct unsafe acts or conditions through the regular line of authority, although the Officer may exercise emergency authority to stop or prevent unsafe acts when immediate action is required. The Safety Officer maintains awareness of active and developing situations, ensures the preparation and implementation of the Site Safety Plan and includes safety messages in each Incident Action Plan.

SAFETY OFFICER	COMMENT
Identify hazardous or unsafe situations associated with the incident by ensuring the performance of preliminary and continuous site characterization and analysis which shall include the identification of all actual or potential physical, biological and chemical hazards known or expected to be present on site.	
Participate in Planning Meetings to identify any health and safety concerns inherent in the operations daily workplan.	
Review the Incident Action Plan for safety implications.	
Exercise emergency authority to stop and prevent unsafe acts.	
Investigate accidents that have occurred within the incident areas.	
<p>Ensure the preparation and implementation of the Site Specific Health and Safety Plan (HASP) in accordance with the Area Contingency Plan (ACP) and State and Federal OSHA regulations. The HASP shall at minimum address, include or contain the following elements:</p> <ul style="list-style-type: none"> • Health and Safety hazard analysis for each site task or operation • Comprehensive operations work plan • Personnel training requirements • PPE selection criteria • Site specific occupational medical monitoring requirements • Air monitoring plan: area/personal • Site control measures • Confined space entry procedures "only if needed" • Pre-entry briefings (tailgate meetings) initial and as needed • Pre-operations health and safety conference for all incident participants • Quality assurance of HASP effectiveness 	
Assign assistants and manage the incident safety organization.	
Review and approve the Medical Plan.	
Participate in Post Incident Review.	

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4.6.4 Liaison Officer Job Description Checklist

Incidents that are multi-jurisdiction, or have several agencies involved, may require the establishment of the Liaison Officer position on the Command Staff.

LIAISON OFFICER	COMMENT
Provide a point of contact for assisting and cooperating Agency Representatives.	
Identify Agency Representatives from each agency including communications link and location.	
Maintain a list of assisting and coordinating interagency contacts.	
Assist in establishing and coordinating interagency contacts.	
Keep agencies supporting incident aware of incident status.	
Monitor incident operations to identify current or potential inter-organizational issues and advise Incident Commander as appropriate.	
Participate in Planning Meetings, provide current resource status information, including limitations and capabilities of assisting agency resources.	
Participate in Post Incident Review.	

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4.6.5 Legal Officer Job Description Checklist

The **Legal Officer** is a member of the Command Staff, and is responsible for advising on all legal matters and potential liability issues.

LEGAL OFFICER	COMMENT
Review Common Responsibilities.	
Participate in Planning Meetings if requested.	
Advise Unified Command on legal/liability issues relating to implementation of response tactics (i.e; in-situ burning, use of dispersants and other alternative response tactics and technologies).	
Advise Unified Command on legal issues relating to Natural Resource Damage Assessment (NRDA).	
Advise Unified Command on legal issues relating to investigation.	
Advise Unified Command on legal issues relating to finance and claims.	
Advise Unified Command on response related issues.	
Participate in Post Incident Review.	

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4.6.6 Operations Section Chief Job Description Checklist

The Operations Section Chief, a member of the General Staff, is responsible for the management of all operations directly applicable to the primary mission. The Operations Section Chief activates and supervises elements in accordance with the Incident Action Plan and directs its execution; activates and executes the Site Safety Plan; directs the preparation of

Unit operational plans, requests or releases resources, makes expedient changes to the Incident Action Plan as necessary and reports such to the Incident Commander.

OPERATIONS SECTION CHIEF	COMMENT
Develop operations portion of Incident Action Plan.	
Brief and assign operations personnel in accordance with Incident Action Plan.	
Supervise the execution of the Incident Action Plan for Operations.	
Request resources needed to implement the Operations tactics as part of the Incident Action Plan development (ICS 215).	
Ensure safe tactical operations.	
Make or approve expedient changes to the Incident Action Plan during operational period as necessary.	
Approve suggested list of resources to be released from assigned status (not released from the incident).	
Assemble and disassemble Strike Teams/Task Forces assigned to Operations Section.	
Report information about changes in the implementation of the IAP, special activities, events and occurrences to Incident Commander as well as to Planning Section Chief and Information Officer.	
Participate in Post Incident Review.	

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4.6.7 Planning Section Chief Job Description Checklist

The Planning Section Chief, a member of the General Staff, is responsible for the collection, evaluation, dissemination and use of information about the development of the incident and status of resources. Information is needed to:

- Understand the current situation
- Predict probable course of incident events
- Prepare alternative strategies for the incident

PLANNING SECTION CHIEF	COMMENT
Activate Planning Section Units.	
Assign available personnel already on site to ICS organizational positions as appropriate.	
Collect and process situation information about the incident.	
Supervise preparation of the Incident Action Plan.	
Provide input to the Incident Command and Operations Sections Chief in preparing the Incident Action Plan.	
Participate in planning and other meetings as required.	
Establish information requirements and reporting schedules for all ICS	

organizational elements for use in preparing the Incident Action Plan.	
Determine need for any specialized resources in support of the incident.	
Provide Resources Unit with the Planning Section's organizational structure including names and locations of assigned personnel.	
Assign Technical Specialists where needed.	
Assemble information on alternative strategies.	
Assemble and disassemble Strike Teams and Task Forces as necessary.	
Provide periodic predictions on incident potential.	
Compile and display Incident Status Summary information.	
Provide status reports to appropriate requesters.	
Advise General Staff of any significant changes in incident status.	
Incorporate the incident Traffic Plan (from Ground Support Unit), Vessel Routing Plan (from Vessel Support Unit) and other supporting plans into the Incident Action Plan.	
Instruct Planning Section Units in distribution and routing of incident information.	
Prepare recommendations for release of resources for submission to members of Incident Command.	
Maintain Section record.	
Participate in Post Incident Review.	

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4.6.8 Logistics Section Chief Job Description Checklist

The Logistics Section Chief, a member of the General Staff, is responsible for providing facilities, services, material, etc. in support of the response effort. The Logistics Section Chief participates in development and implementation of the Incident Action Plan and activates and supervises Branches and Units within the Logistics Section.

LOGISTICS SECTION CHIEF	COMMENT
Plan organization of Logistics Section.	
Assign work locations and preliminary work tasks to Section personnel.	
Notify Resources Unit of Logistics Section Units activated including names and locations of assigned personnel.	
Assemble and brief Branch Directors and Unit Leaders.	
Participate in preparation of Incident Action Plan.	
Identify service and support requirements for planned and expected operations.	
Provide input to and review Communications Plan, Medical Plan, Traffic Plan and Vessel Routing Plan.	
Coordinate and process requests for additional resources.	

Review Incident Action Plan and estimate Section needs for next operational period.	
Advise on current service and support elements of the Incident Action Plan.	
Prepare service and support elements of the Incident Action Plan.	
Estimate future service and support requirements.	
Receive Demobilization Plan from Planning Section.	
Recommend release of Unit resources in conformance with Demobilization Plan.	
Ensure general welfare and safety of Logistics Section personnel.	
Participate in Post Incident Review.	

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4.6.9 Finance Section Chief Job Description Checklist

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

FINANCE SECTION CHIEF	COMMENT
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.	

SECTION 5

INCIDENT PLANNING

5.1 Documentation Procedures

5.2 ICS Forms

5.3 Site Safety and Health Plan

5.4 Decontamination Plan

5.5 Disposal Plan

5.6 Incident Security Plan

5.7 Demobilization Plan

5.8 Alternative Response Techniques

Figure 5.8-1 - Alternative Strategies Checklist

Figure 5.8-2 - In-Situ Burn Plan

Figure 5.8-3 - Bioremediation Checklist

Figure 5.8-4 - Dispersant Plan

5.1 DOCUMENTATION PROCEDURES

Documentation of a spill response provides a historical record, keeps management informed, serves as a legal instrument, and is a means to account for the clean-up costs.

Documentation should begin immediately upon spill notification and continue until termination of all operations. Documentation should include the following:

- Spill origin and characteristics
- Sampling surveys
- Photographic surveys
- Climatological data
- Labor and equipment accounting
- Copies of all logs, contracts, contacts, and plans prepared for incident

5.2 ICS FORMS

- **INCIDENT BRIEFING FORM - ICS 201 (Initial Report Only)**

For use by the Command Staff to gather information on the Spill Management Team's efforts to implement applicable response plans. Prepared by the initial Incident Commander (IC) for providing documentation of the initial response.

- **OPERATIONAL PLANNING MEETING**

Creates the Plan for tactical deployment during the next operational period.

The following ICS forms can be used:

- **OPERATIONAL PLANNING WORKSHEET - ICS 215**

This form communicates to the Resources Unit the resources needed as a result of decisions made during the Tactics and Planning meetings.

- **RADIO REQUIREMENTS WORKSHEET - ICS 216**

Used to develop the total number of personal portable radios required for each Division/Group and Branch. It provides a listing of all units assigned to each Division, and thus depicts the total incident radio needs.

- **RADIO FREQUENCY WORKSHEET - ICS 217**

Used by the Communications Unit Leader to assist in determining frequency allocations.

- **INCIDENT ACTION PLAN**

For use by the Planning Section to plan each day's response actions. This plan consists of the portions identified on the IAP cover page and must be approved by the Incident Commander, FOSC, and SOSC.

The IAP consists of the following ICS forms:

- **INCIDENT ACTION PLAN (IAP) COVER PAGE**

For use in presenting initial information, signature approval, and table of contents of forms contained in the IAP.

- **INCIDENT OBJECTIVES - ICS 202**

Describes the basic incident strategy, control objectives, and provides weather, tide and current information, and safety considerations for use during the next operational period.

- **ORGANIZATION ASSIGNMENT LIST - ICS 203**

Provides ICS personnel with information on the units that are currently activated and the names of personnel staffing each position/unit.

- **ASSIGNMENT LIST - ICS 204**

Submits assignments at the level of Division and Groups.

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5.2 ICS FORMS, CONTINUED

- **ASSIGNMENT LIST ATTACHMENT- ICS 204a**

This form is an optional attachment, which can be used in conjunction with the Assignment List, ICS form 204-OS. The ICS 204-OS is used to give assignments to Divisions and Groups; the ICS form 204-a-OS provides more specific assignment information, when needed.

- **COMMUNICATIONS PLAN - 205**

Is used to provide, in the location, information on all radio frequency assignments down to the Division/Group level for each operational period.

- **COMMUNICATIONS LIST - ICS 205a**

This optional form is used in conjunction with the Incident Radio Communications Plan, ICS form 205-OS. ICS form 205a-OS, lists methods of contact for personnel

assigned to the incident (radio frequencies, phone numbers, pager numbers, etc.), and functions as an incident directory.

- **MEDICAL PLAN - ICS 206**

Provides information on incident medical aid stations, transportation services, hospitals, and medical emergency procedures.

- **RESOURCES AT RISK - ICS 232**

Provides information about sites in the incident area which are sensitive due to environmental, archaeo-cultural, or socio-economic resources at risk, and identifies incident-specific priorities and issues.

- **EXECUTIVE SUMMARY**

The Executive Summary communicates significant response issues during the current operational period, summarizing the daily activities for all sections in a brief format to Senior Managers, Administrators, Senior Agency Staff, and Civic Leaders.

- **INCIDENT STATUS SUMMARY - ICS 209**

Used to inform personnel about the status of response efforts.

- **AIR OPERATIONS SUMMARY - ICS 220**

Provides the Air Operations Branch with the number, type, location, and specific assignments of aircraft.

- **MEETING SCHEDULE - ICS 230**

Records information about the daily scheduled meeting activities.

5.2 ICS FORMS, CONTINUED

- **MEETING SUMMARY - ICS 231**

Provides more detailed information concerning the attendees and notes from a particular meeting.

- **GENERAL PLAN**

Displays the progress and planned start and end dates for various incident response activities.

- **RESOURCE TRACKING**

- **STATUS CHANGE - ICS 210**

Used to record status change information received on resources assigned to the incident.

- **CHECK-IN LIST EQUIPMENT - ICS 211e**

This form is used for equipment check-in-only. Equipment arriving at the incident can check in at various incident locations.

- **CHECK-IN LIST PERSONNEL - ICS 211p**

This for is used for personnel check-in-only. Personnel arriving at the incident can be checked in at various incident locations.

- **SUPPORT VEHICLE INVENTORY - ICS 218**

Provides an inventory of all transportation and support vehicles assigned to the incident.

- **T-CARDS - ICS 219**

T-Cards are used by the Resources Unit to record status and location information on resources, transportation, and support vehicles and personnel.

- **DEMOBILIZATION CHECK-OUT - ICS 221**

Form provides the Planning Section information on resource releases from the incident.

In addition, these Incident Command System (ICS) forms may be found on the U. S. Coast Guard web page: <http://www.uscg.mil/pacarea/pm/icsforms/ics.htm>

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1. Incident Name	2. Prepared By: (Name) Date: Time:	INCIDENT BRIEFING ICS 201-OS
3. Map / Sketch (Include maps drawn here or attached, showing the total area of operations, the incident site/area, overflight results, trajectories, impacted shorelines or other graphics depicting situational and response status)		

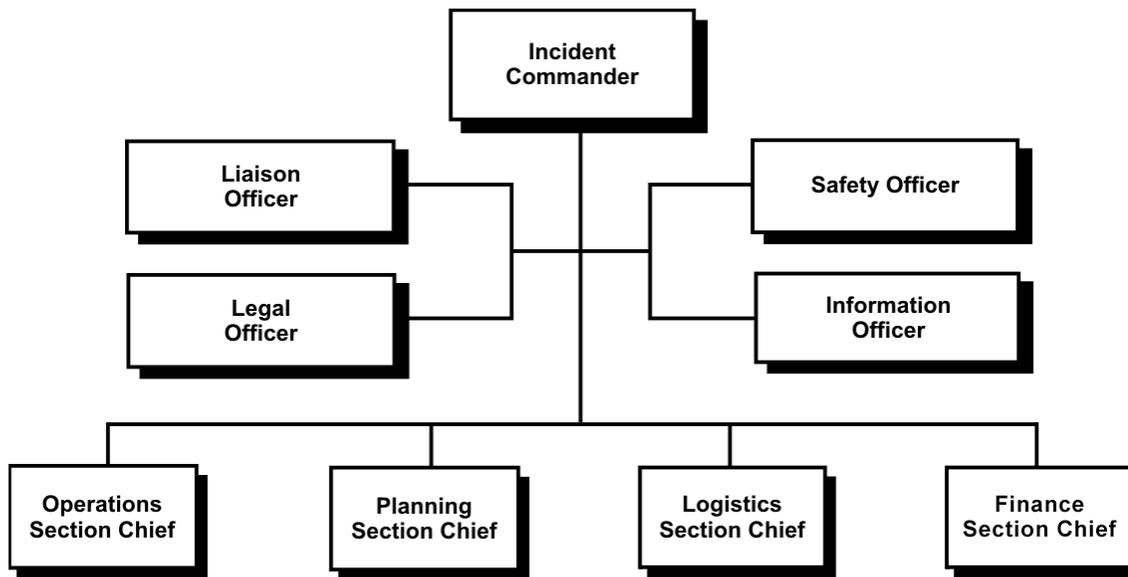
INCIDENT BRIEFING

March, 2000

ICS 201-OS (pg 1 of 4)

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1. Incident Name	2. Prepared By: (Name) Date: Time:	INCIDENT BRIEFING ICS 201-OS
4. Initial Incident Objectives		
5. Summary of Current Actions		
Time	Action/Note	



INCIDENT BRIEFING

March, 2000

ICS 201-OS (pg 3 of 4)

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1. Incident Name	2. Prepared By: (Name) Date: Time:	INCIDENT BRIEFING ICS 201-OS
------------------	--	---------------------------------

7. Resources Summary

Resources Needed	Time Ordered	Resource Identifier	ETA	On Scene? (X)	Notes: (Location/Assignment/Status)

1. Incident Name		2. Operational Period (Date/Time)					OPERATIONAL PLANNING WORKSHEET ICS 215-OS			
3. Division/ Group or Location	4. Work Assignments	5. Resource/Equipment					6. Notes/ Remarks	7. Reporting Location	8. Requested Arrival Time	9. "X" here if 204a Needed
		Resource								
		Req.								
		Have							<input type="checkbox"/>	
		Need								
		Req.								
		Have							<input type="checkbox"/>	
		Need								
		Req.								
		Have							<input type="checkbox"/>	
		Need								
		Req.								
		Have							<input type="checkbox"/>	
		Need								
		Req.								
		Have							<input type="checkbox"/>	
		Need								
		Req.								
		Have							<input type="checkbox"/>	
		Need								
		Req.								
		Have							<input type="checkbox"/>	
		Need								
		10. Total Resources Required								
		11. Total Resources On Hand								
		12. Total Resources Needed								

216 ICS 3-82	Page					10. Prepared By: (Communication Unit)					

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1. INCIDENT NAME	2. DATE	3. OPERATIONAL PERIOD (DATE/TIME)	RADIO FREQUENCY ASSIGNMENT WORKSHEET ICS 217			
4. INCIDENT ORGANIZATION						
5. RADIO DATA	SOURCE	FUNCTION	CH#	FREQUENCY	TOTAL BY REQ.	
INCIDENT COMMANDER						
SAFETY OFFICER						
OPERATIONS SECTION CHIEF						
AIR OPERATIONS						
AIR TACTICAL SUPERVISOR						
PLANNING SECTION CHIEF						
GROUND SUPPORT UNIT						
BASE UNIT						
COM CENTER						
BRANCH						
DIVISION						
DIVISION						
BRANCH						
DIVISION						
DIVISION						
BRANCH						
DIVISION						
DIVISION						

Shoreline Cleanup Assessment Team Report for Location

Previous day's progress, problems for location

ICS 204a-OS (Assignment List Attachment)

ICS 205-OS (Communications Plan)

ICS 205a-OS (Communications List)

ICS 206-OS (Medical Plan)

ICS 209-OS (Incident Status Summary)

ICS 230-OS (Daily Meeting Schedule)

ICS 232-OS (Resources at Risk Summary)

4. Prepared By: (Planning Section Chief)

Date/Time

IAP COVER SHEET

March, 2000

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1. Incident Name	2. Operational Period (Date/Time) From: To:	INCIDENT OBJECTIVES ICS 202-OS
3. Overall Incident Objective(s)		
4. Objectives for Specified Operational Period		
5. Safety Message for Specified Operational Period		

Approved Site Safety Plan Located at:

6. Weather: See Attached Weather Sheet

7. Tides/Currents: See Attached Tide/Current Data

8. Time of Sunrise:

Time of Sunset:

9. Attachments: (check if attached)

- Organization List (ICS 203-OS) Assignment List (ICS 204-OS) Communications Plan (ICS 205-OS)
 Medical Plan (ICS 206-OS) Incident Map(s) Traffic Plan
 Resources At Risk Summary (ICS 232-OS)

10. Prepared By: (Planning Section Chief)

Date/Time

INCIDENT OBJECTIVES

March, 2000

ICS 202-OS

Brownsville Terminal Complex September 2004

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1. Incident Name	2. Operational Period (Date/Time) From: To:	ORGANIZATION ASSIGNMENT LIST ICS 203-OS																																																		
3. Incident Commander and Staff <table border="1" style="width: 100%;"> <tr> <td></td> <td style="text-align: center;">Primary</td> <td style="text-align: center;">Deputy</td> </tr> <tr> <td>Federal:</td> <td><input type="text"/></td> <td><input type="text"/></td> </tr> <tr> <td>State:</td> <td><input type="text"/></td> <td><input type="text"/></td> </tr> <tr> <td>IC:</td> <td><input type="text"/></td> <td><input type="text"/></td> </tr> </table> Safety Officer : <input type="text"/> Information Officer: <input type="text"/> Liaison Officer: <input type="text"/>			Primary	Deputy	Federal:	<input type="text"/>	<input type="text"/>	State:	<input type="text"/>	<input type="text"/>	IC:	<input type="text"/>	<input type="text"/>	7. Operations Section <table border="1" style="width: 100%;"> <tr> <td>Chief</td> <td><input type="text"/></td> </tr> <tr> <td>Deputy</td> <td><input type="text"/></td> </tr> <tr> <td colspan="2">a. Branch I - Division/Groups</td> </tr> <tr> <td>Branch Director</td> <td><input type="text"/></td> </tr> <tr> <td>Deputy</td> <td><input type="text"/></td> </tr> <tr> <td>Division / Group</td> <td><input type="text"/></td> </tr> <tr> <td colspan="2">b. Branch II - Division/Groups</td> </tr> <tr> <td>Branch Director</td> <td><input type="text"/></td> </tr> <tr> <td>Deputy</td> <td><input type="text"/></td> </tr> <tr> <td>Division / Group</td> <td><input type="text"/></td> </tr> <tr> <td colspan="2">c. Branch III - Division/Groups</td> </tr> <tr> <td><input type="text"/></td> <td><input type="text"/></td> </tr> </table>	Chief	<input type="text"/>	Deputy	<input type="text"/>	a. Branch I - Division/Groups		Branch Director	<input type="text"/>	Deputy	<input type="text"/>	Division / Group	<input type="text"/>	b. Branch II - Division/Groups		Branch Director	<input type="text"/>	Deputy	<input type="text"/>	Division / Group	<input type="text"/>	c. Branch III - Division/Groups		<input type="text"/>	<input type="text"/>														
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4. Agency Representatives <table border="1" style="width: 100%;"> <thead> <tr> <th>Agency</th> <th>Name</th> </tr> </thead> <tbody> <tr><td> </td><td> </td></tr> </tbody> </table>		Agency	Name																																																	
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Situation Unit	<input type="text"/>																																																			

Environmental Unit Documentation Unit Demobilization Unit Technical Specialists 6. Logistics Section Chief Deputy Time Unit Procurement Unit Compensation Unit Cost Unit a. Support Branch Director Supply Unit Facilities Unit Transportation Unit Vessel Support Unit Ground Support Unit b. Service Branch Director Communications Unit Medical Unit Food Unit	Branch Director Deputy Division / Group Division / Group Division / Group Division / Group Division / Group d. Air Operations Branch Air Operations Br. Dir. Air Tactical Supervisor Air Support Supervisor Helicopter Coordinator Fixed-wing Coordinator 8. Finance Section Chief Deputy Time Unit Procurement Unit Compensation Unit Cost Unit
---	---

9. Prepared By: (Resources Unit)	Date/Time	
ORGANIZATION	March, 2000	ICS 203-OS
ASSIGNMENT LIST		

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1. Incident Name	2. Operational Period (Date/Time) From: To :	ASSIGNMENT LIST ICS 204-OS		
3. Branch		4. Division/Group		
5. Operations Personnel	Name	Affiliation	Contact # (s)	
Operations Section Chief:				
Branch Director:				
Division/Group Supervisor:				
6. Resources Assigned This Period	?X? indicates 204a attachment with special instructions			
Strike Team/Task Force/	Leader	Contact Info. #	# of Persons	Notes/Remarks

Resource Identifier				

7. Assignments**8. Special Instruction for Division/Group****9. Communications (radio and / or phone contact numbers needed for this assignment)**

Name/Function	Radio: Freq./System/Channel	Phone	Pager

Emergency Communications

Medical:	Evacuation:	Other:	
10. Prepared By: (Resources Unit Leader)	Date/Time	11. Approved By: (Planning Section Chief)	Date/Time

ASSIGNMENT LIST

September, 2000

ISC 204-OS

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1. Incident Name	2. Operational Period (Date/Time) From:	ASSIGNMENT LIST ATTACHMENT ICS 204a-OS
3. Branch	4. Division/Group	
5. Strike Team/Task Force/ Resource Identifier	6. Leader	7. Assignment Location
8. Work Assignment Special Instructions (if any)		[Ops]

4. Prepared By: (Communications Unit)	Date/Time
COMMUNICATIONS LIST	September, 2000
	ICS 205a-OS

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1. Incident Name	2. Operational Period (Date/Time)	MEDICAL PLAN
	From: To:	ICS 206-OS

3. Medical Aid Stations

Name	Location	Contact #	Paramedics
			On Site (Y/N)

4. Transportation

Ambulance Service	Address	Contact #	Paramedics
			On Board (Y/N)

5. Hospitals

Hospital Name	Address	Contact #	Travel Time		Burn Ctr?	Heli-Pad?
			Air	Ground		

6. Special Medical Emergency Procedures

7. Prepared By: (Medical Unit Leader)	Date/Time	8. Reviewed By: (Safety Officer)	Date/Time
---------------------------------------	-----------	----------------------------------	-----------

MEDICAL PLAN

March, 2000

ICS 206-OS

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1. Incident Name	2. Operational Period (Date/Time) From: To:	RESOURCES AT RISK SUMMARY ICS 232-OS
------------------	---	---

3. Environmentally Sensitive Areas and Wildlife Issues

Site #	Priority	Site Name and/or Physical Location	Site Issues

Narrative:

--

4. Archaeo-cultural and Socioeconomic Issues

Site #	Priority	Site Name and/or Physical Location	Site Issues

Narrative:

5. Prepared By: (Environmental Unit Leader) Date/Time

RESOURCES AT RISK
SUMMARY

September, 2000

ICS 232-OS

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1. Incident Name	2. Operational Period (Date/Time) From: To:	EXECUTIVE SUMMARY
------------------	---	-------------------

3. Operations:**4. Environmental:**

5. Planning:

6. Other:

Prepared By: (Situation Unit Leader)

Date/Time

EXECUTIVE SUMMARY

September, 2000

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1. Incident Name		2. Period Covered By Report From: _____ To: _____		Time of Report	INCIDENT STATUS SUMMARY ICS 209-OS	
3. Spill Status (Estimated, in Barrels)			[OPS/EUL/SSC]		7. Safety Status [Safety Officer]	
Source Status:		Remaining Potential (bbl):		Since Last Report		Total
		Rate of Spillage (bbl/hr):		Responder Injury		
Secured	<input type="checkbox"/>	Unsecured	<input type="checkbox"/>	Public Injury		
Volume Spilled		Since Last Report	Total			
Mass Balance/Oil Budget				8. Equipment Resources [RUL]		
Recovered Oil				Description	Ordered	Available / Staged
Evaporation				Spill Resp. Vsls		Assigned
Natural Dispersion				Fishing Vessels		Out of Service
Chemical Dispersion				Tugs		
				Barges		

Burned								Other Vessels				
Floating, Contained												
Floating, Uncontained								Skimmers				
Onshore								Boom (ft.)				
Total Spilled Oil Accounted For:								Sbnt/Snr Bm. (ft.)				
4. Waste Management (Estimated)				[OPS/Disposal]								
	Recovered	Stored	Disposed					Vacuum Trucks				
Oil (bbl)												
Oily Liquids (bbl)								Helicopters				
Liquids (bbl)												
Oily Solids (tons)								Fixed Wing				
Solids (tons)												
5. Shoreline Impacts (Estimated, in miles)				[PSC/EUL/SSC]				9. Personnel Resources			[RUL]	
Degree of Oiling	Affected	Cleaned	To Be Cleaned					Organization	People in Cmd. Post	People in the Field	Total People On Scene	
Light								Federal				
Medium								State				
Heavy								Local				
Total								RP				
6. Wildlife Impacts				[OPS/Wildlife Br.]				Contract Personnel				
Numbers in () indicate subtotal that are threatened / endangered species.						Died in Facility		Volunteers				
	Captured	Cleaned	Released	DOA	Euth.	Other		Total Response Personnel From All Organizations:				
Birds								10. Special Notes				
Mammals												
Reptiles												
Fish												
Total												
11. Prepared By: (Situation Unit Leader)								Date/Time				
INCIDENT STATUS				March, 2000				ICS 209-OS				
SUMMARY												

Brownsville Terminal Complex September 2004

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1. Incident Name	2. Operational Period (Date/Time)	AIR OPERATIONS SUMMARY ICS 220-OS
	From: To:	

Equipment		
AIR OPERATIONS SUMMARY	September, 2000?	ICS 220-OS

Brownsville Terminal Complex September 2004

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1. Incident Name	2. Operational Period (Date/Time) From: To:	DAILY MEETING SCHEDULE ICS 230-OS
------------------	--	---

3. Meeting Schedule (Commonly-held meetings are included)

Date/Time	Meeting Name	Purpose	Attendees	Location
	Tactics Meeting	Develop primary and alternate Strategies to meet Incident Objectives for the next operational period.	PSC, OPS, LSC, EUL, RUL & SUL	
	Planning Meeting	Review status and finalize strategies and assignments to meet incident objectives for the next operational period.	Determined by the IC / UC	
	Operations Briefing	Present IAP and assignments to the Supervisors/Leaders for the next operational	IC / US, Command Staff, General Staff, Branch Directors, Div. Sups., Task	

		period.	Force / Strike Team Leaders and Unit Leaders	
	Unified Command Objectives Meeting	Review/identify objectives for the next operational period.	Unified Command members	
4. Prepared By: (Situation Unit Leader)			Date/Time:	
DAILY MEETING SCHEDULE		March, 2000	ICS 230-OS	

Brownsville Terminal Complex September 2004

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1. Incident Name	2. Meeting Date/Time	MEETING SUMMARY ICS 231-OS
3. Meeting Name		
4. Meeting Location		
5. Facilitator		
6. Attendees		

7. Notes (with summary of decisions and action items)

8. Prepared By:

Date/Time

MEETING SUMMARY

March, 2000

ICS 231-OS

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1. Incident Name		GENERAL PLAN																				
2. Prepared By	Date/Time Prepared	3. Operational Period (Date/Time)																				
		From:						To:														
4. Notification (Date and time completed)		5. Response Initiation (Date and time completed)																				
6. Plan Item	Timeframe== > (Enter days or weeks)																					
Site Characterization, Forecasts, and Analysis																						
Site Safety																						
Site Security																						
Source Stabilization, Salvage, and Lightering																						
Surveillance																						
On Water Containment and Recovery																						

7. Time of Location/Status Change	
-----------------------------------	--

8. Comments	
-------------	--

9. Prepared By:	Date/Time
-----------------	-----------

10. Processed By: (Resources Unit)	Date/Time
------------------------------------	-----------

STATUS CHANGE	September, 2000	ICS 210-OS
---------------	-----------------	------------

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1. Incident Name	2. Operational Period (Date/Time)		3. Check-In Location		CHECK-IN LIST (Equipment)			
			<input type="checkbox"/> Command Post?	<input type="checkbox"/> Other	ICS 211e-OS			
From: ?	To:	<input type="checkbox"/> Staging Area???????						
Equipment Check-In Information			9. Initial Incident Check-In?				10. Time	
4. Equipment Description	5. Equipment Identifier	6. Supplier/ Owner	7. Assignment	8. Contact Information	Y/N	In	Out	
					<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
					<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
					<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
					<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
					<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

DEPARTURE POINT	
PILOT NAME	
DESTINATION POINT	ETA
REMARKS	
INCIDENT LOCATION	TIME
STATUS	
ETR	
NOTE	
INCIDENT LOCATION	TIME
STATUS	
ETR	
NOTE	

NOTE	
INCIDENT LOCATION	TIME
STATUS	
ETR	
NOTE	
INCIDENT LOCATION	TIME
STATUS	
ETR	
NOTE	
INCIDENT LOCATION	TIME
STATUS	
ETR	
NOTE	

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1. Incident Name	2. Operational Period (Date / Time)		DEMOB. CHECK- OUT ICS 221-OS
	From:	To:	
3. Unit / Personnel Released		4. Release Date / Time	
5. Unit / Personnel			
You and your resources have been released, subject to signoff from the following: Demobilization Unit Leader; "X" appropriate box (es)			
Logistics Section			

All government and contractor personnel who enter the exclusion zones or use air purifying respirators must be enrolled in a medical monitoring program.

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GENERAL SAFETY RULES AND EQUIPMENT:

1. There will be no eating, drinking, or smoking in the exclusion zone or the contamination reduction zone.
2. All personnel must pass through the contamination reduction zone to enter or exit the exclusion zone (hot zone).
3. At a minimum, Decontamination Team members must be in one (1) level of protection lower than that of the entry teams.
4. All decontamination equipment and systems must be in place before an entry can be made.
5. Entry team will consist of a minimum of two members with the same number of personnel assigned to a backup team. All entry personnel will adhere to the buddy system.
6. At the end of the incident, or directly after a possible exposure, each entry team member will take a full body shower and launder any personal clothing used at the scene.
7. All breathing air shall be certified as Grade D or better.
8. Where practical, all tools shall be of the nonsparking type.
9. Fire equipment shall be on hand when the situation warrants such support. At a minimum, fire extinguishers shall be available on scene.
10. Since incident evacuation may be necessary if an explosion, fire, or other event occurs; an individual shall be assigned to sound, alert, and notify the responsible command personnel and public officials (if required). The evacuation signal shall be a prolonged blast on an air horn.
11. An adequately stocked Emergency Medical Services (EMS) Unit shall be on site at all times.
12. The location and telephone number of the nearest medical facility shall be posted and known to all personnel.

GENERAL SAFETY BRIEFING:

Before any incident actions are taken, a briefing from the Command Staff will be conducted with all personnel present. Personnel will sign a log sheet, attesting to being present at the briefing. Topics discussed should include known and suspected hazards along with the operation's goals and objectives.

Residential	Other		
Specify:			
TYPE OF SAFETY PLAN:			
Federal	State		
Local	Other		
Specify:			
SUSPECTED CHEMICALS INVOLVED:			
1.	2.		
3.	4.		
5.	6.		
7.	8.		
9.	10.		
INITIAL LEVEL OF PROTECTION: (If level D you must justify)			
A	B	C	D
INITIAL MEDICAL SCREENING COMPLETE: <input type="checkbox"/> Yes <input type="checkbox"/> No			
If no, justify:			
In the event of fire or explosion:			
In the event of potential or actual ionizing radiation exposure:			

In the event of spread of contamination beyond the boundaries of the incident:

EMERGENCY SERVICES:

Emergency medical facility:

Ambulance service:

Poison Control Center:

Chemical manufacturer's representative:

EMERGENCY PROCEDURES (in the event of personnel exposure):

EMERGENCY PROCEDURES (in the event of personnel injury):

HAZARD ASSESSMENT:

Attach Hazardous Materials Safety Data Sheets (MSDS), or other reference materials, for chemicals involved to this document.

MONITORING PROCEDURES:

Monitoring the incident to identify concentration of contaminants in all media. List the instruments to be used and what areas to be monitored.

Hot Zone (Exclusion Zone):

Warm Zone (Contamination Reduction Zone):

Cold Zone (Support Zone):

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MEDICAL MONITORING: (What procedures to be used to monitor personnel for evidence of personal exposure.)

PERSONNEL POTENTIALLY EXPOSED TO HAZARDOUS MATERIALS:

NAME	POSITION	DATE/TIME

DECONTAMINATION PROCEDURES:

(Contaminated personnel, surfaces, materials, instruments, other equipment.)

DECONTAMINATION SOLUTIONS USED:

DISPOSAL PROCEDURES:

	<input type="checkbox"/> Rocky	<input type="checkbox"/> Sandy	<input type="checkbox"/> Muddy	<input type="checkbox"/> Other	
	<input type="checkbox"/> River	<input type="checkbox"/> Creek	<input type="checkbox"/> Canal	<input type="checkbox"/> Bay	<input type="checkbox"/> Ocean
Land	<input type="checkbox"/> Mountains	<input type="checkbox"/> Hills	<input type="checkbox"/> Brushland	<input type="checkbox"/> Forest	<input type="checkbox"/> Grassland
	<input type="checkbox"/> Other				
Use	<input type="checkbox"/> Public	<input type="checkbox"/> Government	<input type="checkbox"/> Residential	<input type="checkbox"/> Commercial	
	<input type="checkbox"/> Recreational	<input type="checkbox"/> Industrial	<input type="checkbox"/> Farmland	<input type="checkbox"/> Other	
Weather	<input type="checkbox"/> Temp _____?F	<input type="checkbox"/> Wind/Dir. _____ mph	<input type="checkbox"/> Rain		
	<input type="checkbox"/> Snow	<input type="checkbox"/> Ice	<input type="checkbox"/> Other		
Pathways for Dispersion	<input type="checkbox"/> Air	<input type="checkbox"/> Water	<input type="checkbox"/> Land	<input type="checkbox"/> Other	
Site Hazards					
<input type="checkbox"/> Chemical Hazards	<input type="checkbox"/> Boats				
<input type="checkbox"/> Slips, trips, falls	<input type="checkbox"/> Helicopters				
<input type="checkbox"/> Heat stress	<input type="checkbox"/> Noise				
<input type="checkbox"/> Cold stress	<input type="checkbox"/> Pumps, hoses				
<input type="checkbox"/> Weather	<input type="checkbox"/> Steam, hot water				
<input type="checkbox"/> Drowning	<input type="checkbox"/> Fire/Explosion				
<input type="checkbox"/> Heavy equipment	<input type="checkbox"/> Poor visibility				
<input type="checkbox"/> Drum handling	<input type="checkbox"/> Motor vehicles				
<input type="checkbox"/> Wildlife/plants	<input type="checkbox"/> Confined spaces (see attachment/appendix)				
<input type="checkbox"/> Hand/power tools	<input type="checkbox"/> Ionizing radiation				
<input type="checkbox"/> Lifting	<input type="checkbox"/> Other				

Air Monitoring			
% LEL	% O ₂	PPM Benzene	PPM H ₂ S
<input type="checkbox"/> Other (specify)			
<input type="checkbox"/> See attachment - Monitoring Results/Methods			

CONTROL MEASURES:

Engineering Controls

- Source of release secured Valve(s) closed Facility shut down
 Site secured
 Other

Personal Protective Equipment (PPE) HAZWOPER Coordination with OSRO

- PVC suits PE/TYVEK suits Respirator
 Site secured PVC gloves Other
 Other Hard hats Eye protection

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HEALTH AND SAFETY/RESPONSE PLAN

CONTROL MEASURES (cont'd):

Decontamination

Stations established (see site map)

Sanitation

Facilities provided per OSHA 1910.120(n)

Illumination

Facilities provided per OSHA 1910.120(m)

Medical Surveillance

Facilities provided per OSHA 1910.120(f)

WORK PLAN: (buddy system must be used.)

- Booming Skimmers Vac. trucks Pumping Excavation
 Heavy equipment Sorbent pads Patching Hot work Shoring
 Appropriate permits issued
 Other (describe):

TRAINING (HAZWOPER training program):

Verified site workers trained per OSHA 1910.120

ORGANIZATION (See Incident Command System chart.):

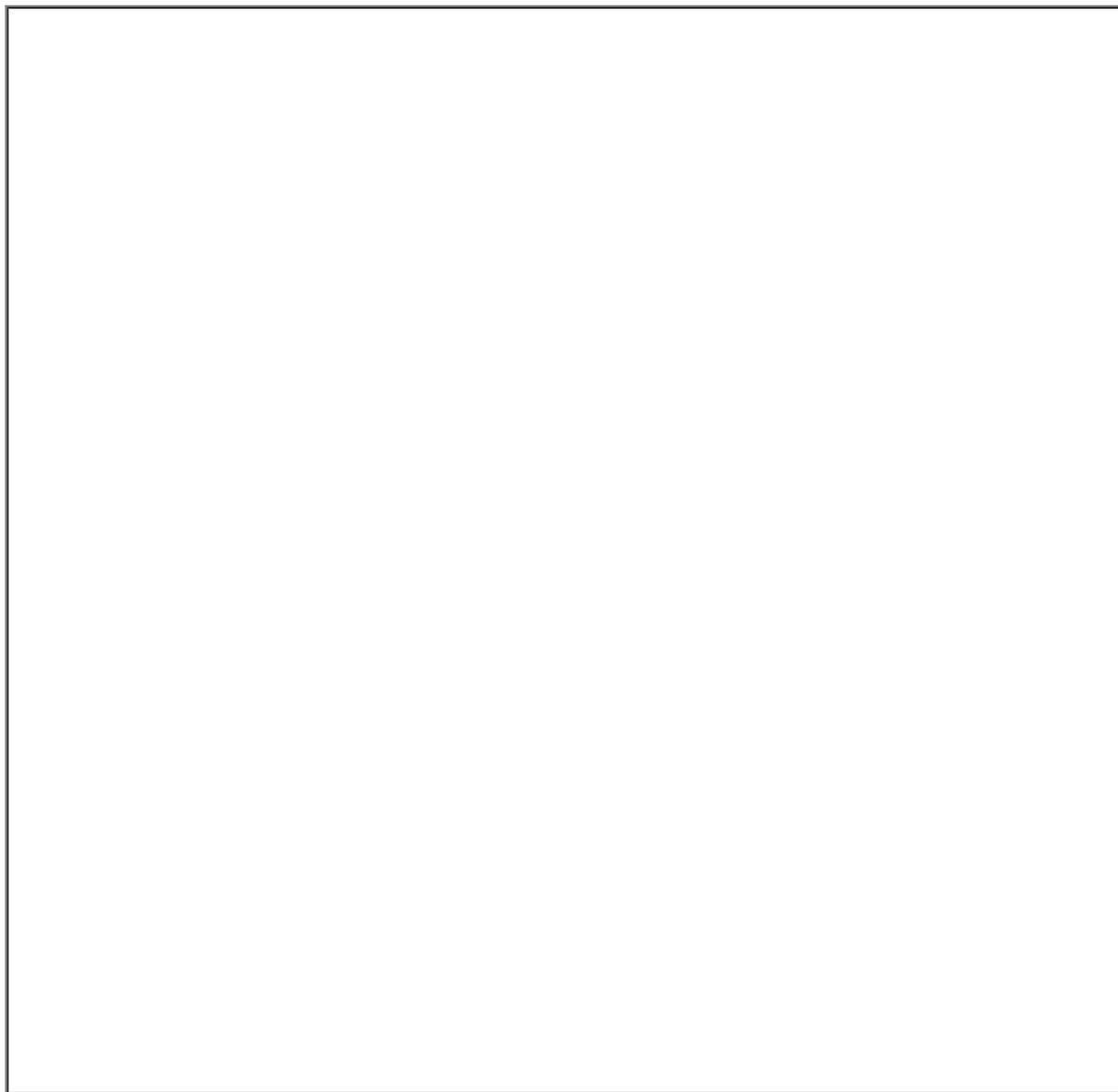
EMERGENCY PLAN (See site map and Daily Medical Plan - ICS 206.):

SITE SECURITY:

- Pre-entry briefing
 Security level Low Medium High
 Other topics

DATE/TIME/PLAN COMPLETED:

By:

SITE DIAGRAM**GENERAL DIAGRAM INSTRUCTIONS****1. Site Diagram should include the following:**

- | | |
|--|--------------------------------|
| a. Sketch with major feature locations
(buildings, drainage paths, roads, etc.) | f. Routes of entry |
| b. Hazardous substance location | g. Wind direction |
| c. Work zones (exclusion, contamination
reduction, support) | h. Emergency evacuation routes |
| d. Command center and decontamination
area | i. Assembly points |
| e. Access and access restrictions | j. First aid locations |
| | k. Communication system |

5.4 DECONTAMINATION PLAN

Incident Name:	Location:
Effective Date of Plan:	Effective Time Period of Plan:
Spill Location:	Plan Prepared By:

- Work Zones:
 - Support (cold) zone
 - Contamination reduction (warm) zone
 - Exclusion (hot) zone

These zones are identified by signs, barrier tape or other means. Decontamination is performed in the contamination reduction zone. When responders exit the exclusion zone they must be decontaminated.

Crews are available to assist in decontamination procedures as needed. The crews must wear appropriate personal protective equipment (PPE), and are responsible for packaging and labeling of contaminated PPE.

- Decontamination Stations:

Decontamination is performed within the contamination reduction zone, which is appropriately lined to prevent the spread of contaminants. Dikes are installed under the lining to contain runoff.

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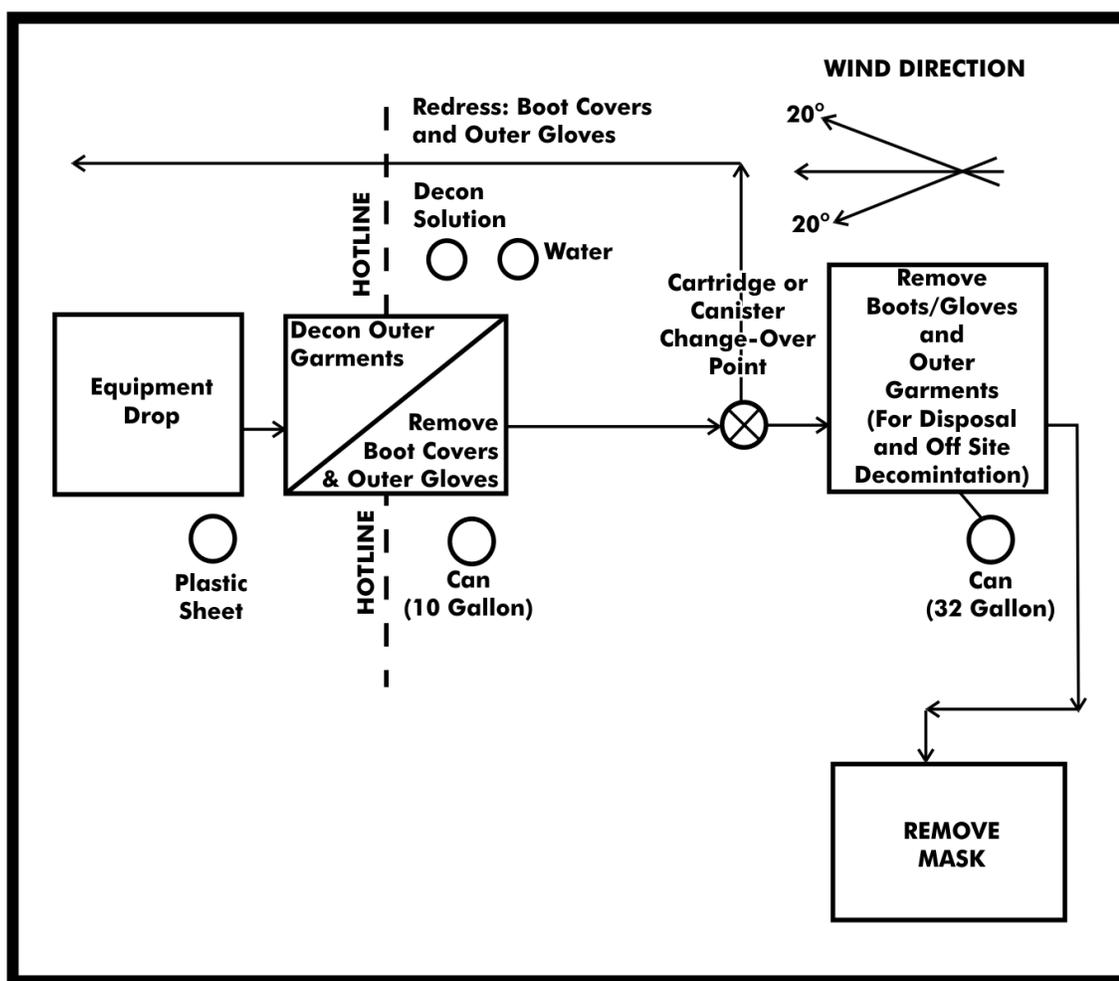
MINIMUM MEASURES FOR DECONTAMINATION		
--------------------------------------	--	--

MINIMUM MEASURES FOR DECONTAMINATION		
STATION 1	Equipment drop	Deposit equipment used on site (tools, sampling devices and containers, monitoring instruments, radios, clipboards, etc.) on plastic drop cloths. Segregation at the drop reduces the probability of cross contamination. During hot weather operations, a cool down station may be set up within this area.
STATION 2	Outer garment, boots and gloves wash, and rinse	Scrub outer boots, outer gloves, and splash suit with decontamination solution or detergent and water. Rinse off using copious amounts of water.
STATION 3	Outer boot and glove removal	Remove outer boots and gloves. Deposit in container with plastic liner.
STATION 4	Canister or mask change	If worker leaves exclusion zone to change canister (or mask) or this is the last step in the decontamination procedures; worker's canister is exchanged, new outer gloves and boot covers are donned, joints are taped, the worker returns to duty.

STATION 5	Boot, gloves, and outer garment removal	Boots, chemical-resistant splash suit, inner gloves removed and deposited in separate containers lined with plastic.
STATION 6	Face piece removal	Face piece is removed. Avoid touching face with fingers. Face piece deposited on plastic sheet.
STATION 7	Field wash	Hands and face are thoroughly washed. Shower as soon as possible.

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DECONTAMINATION PROCEDURES, MINIMUM DECONTAMINATION LAYOUT



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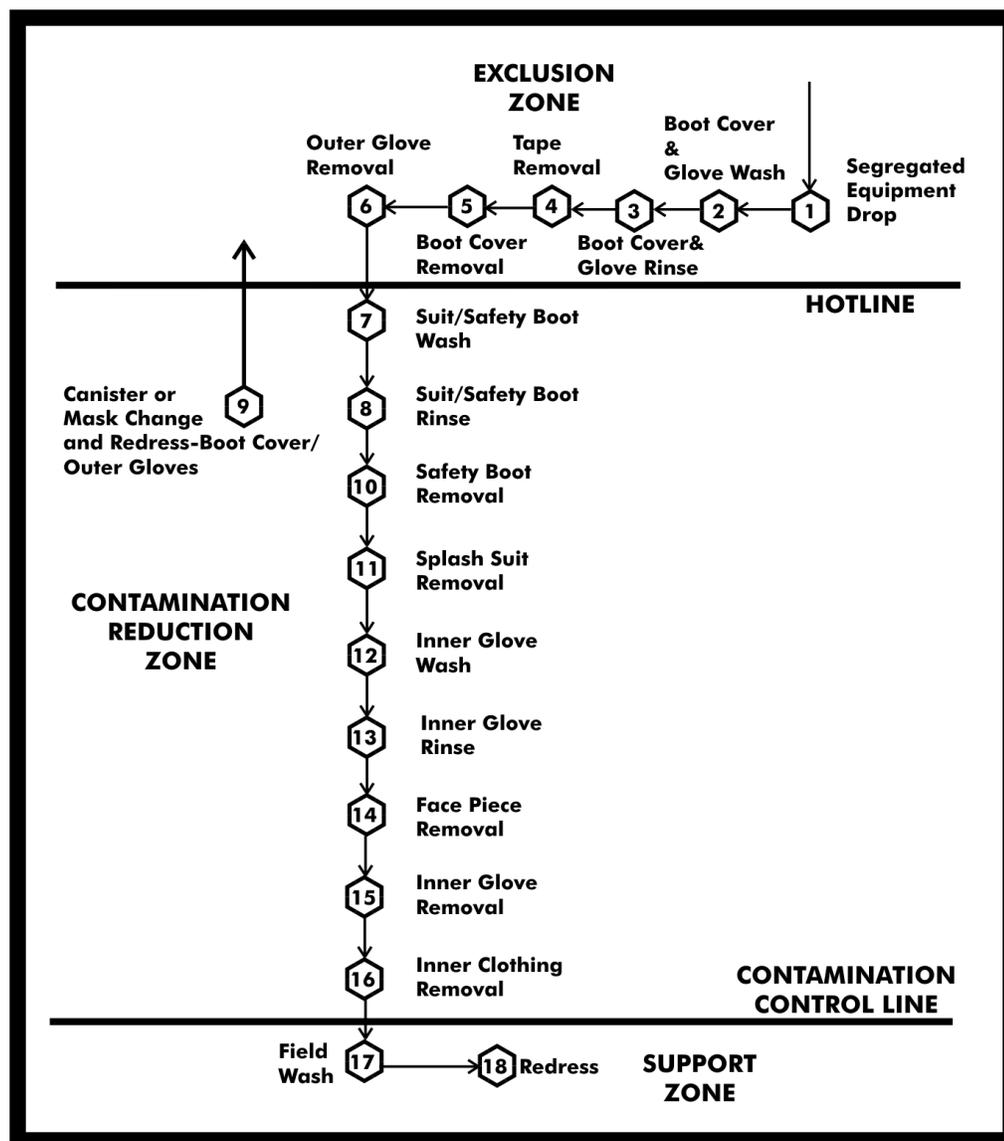
Procedures for these stations are as follows:

MAXIMUM MEASURES FOR DECONTAMINATION		
STATION 1	Segregated equipment drop	Deposit equipment used on site (tools, sampling devices and containers, monitoring instruments,

		radios, clipboards, etc.) on plastic drop cloths or in different containers with plastic liners. Segregation at the drop reduces the probability of cross contamination. During hot weather operations, a cool down station may be set up within this area.
STATION 2	Boot cover and glove wash	Scrub outer boot cover and gloves with decontamination solution or detergent and water.
STATION 3	Boot cover and glove rinse	Rinse off decontamination solution from Station 2 using copious amounts of water.
STATION 4	Tape removal	Remove tape around boots and gloves and deposit in container with plastic liner.
STATION 5	Boot cover removal	Remove boot covers and deposit in containers with plastic liner.
STATION 6	Outer glove removal	Remove outer gloves and deposit in container with plastic liner.
STATION 7	Suit and boot wash	Wash splash suit, gloves, and safety boots. Scrub with long-handled scrub brush and decontamination solution.
STATION 8	Suit and boot and glove rinse	Rinse off decontamination solution using water. Repeat as many times as necessary.
STATION 9	Canister or mask change	If worker leaves exclusion zone to change canister or this is the last step in the decontamination procedure; worker's canister is exchanged, new outer gloves and boot covers are donned, joints are taped, and the worker returns to duty.
STATION 10	Safety boot removal	Remove safety boots and deposit in container with plastic liner.
STATION 11	Splash suit removal	With assistance of helper, remove splash suit. Deposit in container with plastic liner.
STATION 12	Inner glove wash	Wash inner gloves with decontamination solution.
STATION 13	Inner glove rinse	Rinse inner gloves with water.
STATION 14	Face piece removal	Remove face piece. Deposit in container with plastic liner. Avoid touching face with fingers.
STATION 15	Inner glove removal	Remove inner gloves and deposit in lined container.
STATION 16	Inner clothing removal	Remove clothing soaked with perspiration and place in lined container. Do not wear inner clothing off-site since there is a possibility that small amounts of contamination might have been transferred in removing the protective suit.
STATION 17	Field wash	Shower if highly toxic, skin-corrosive or skin-absorbable materials are known or suspected to be present. Wash hands and face if shower is not available.
STATION 18	Re-dress	Put on clean clothes.

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DECONTAMINATION PROCEDURES, MAXIMUM DECONTAMINATION LAYOUT



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5.5 DISPOSAL PLAN

Date:	Location:
Source of release:	
Amount of release:	
Incident name:	
State On-Scene Coordinator:	

Federal On-Scene Coordinator:
Time required for temporary storage:
Proposed storage method:

Disposal priorities:

Sample date:	Sample ID:
Analysis required (type):	
Laboratory performing analysis:	

Disposal options:

	Available	Likely	Possible	Unlikely
Landfill:				
In situ/ bio-remediation:				
In situ burn:				
Pit burning:				
Hydrocyclone:				
Off site incineration:				
Reclaim:				
Recycle:				

Resources required for disposal options:

General information:

Generator name:	US EPA ID#:
Waste properties:	Waste name:
US EPA waste code:	State waste code:
EPA hazardous waste:	
Waste storage and transportation:	
Proposed storage method:	
Proposed transportation method:	

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Permits required for storage:

Permits required for transportation:
Estimated storage capacity:
Number and type of storage required:
Local storage available for temporary storage of recovered oil:

PPE required for waste handling:	
Waste Coordinator:	Date:

Resources required for disposal options:

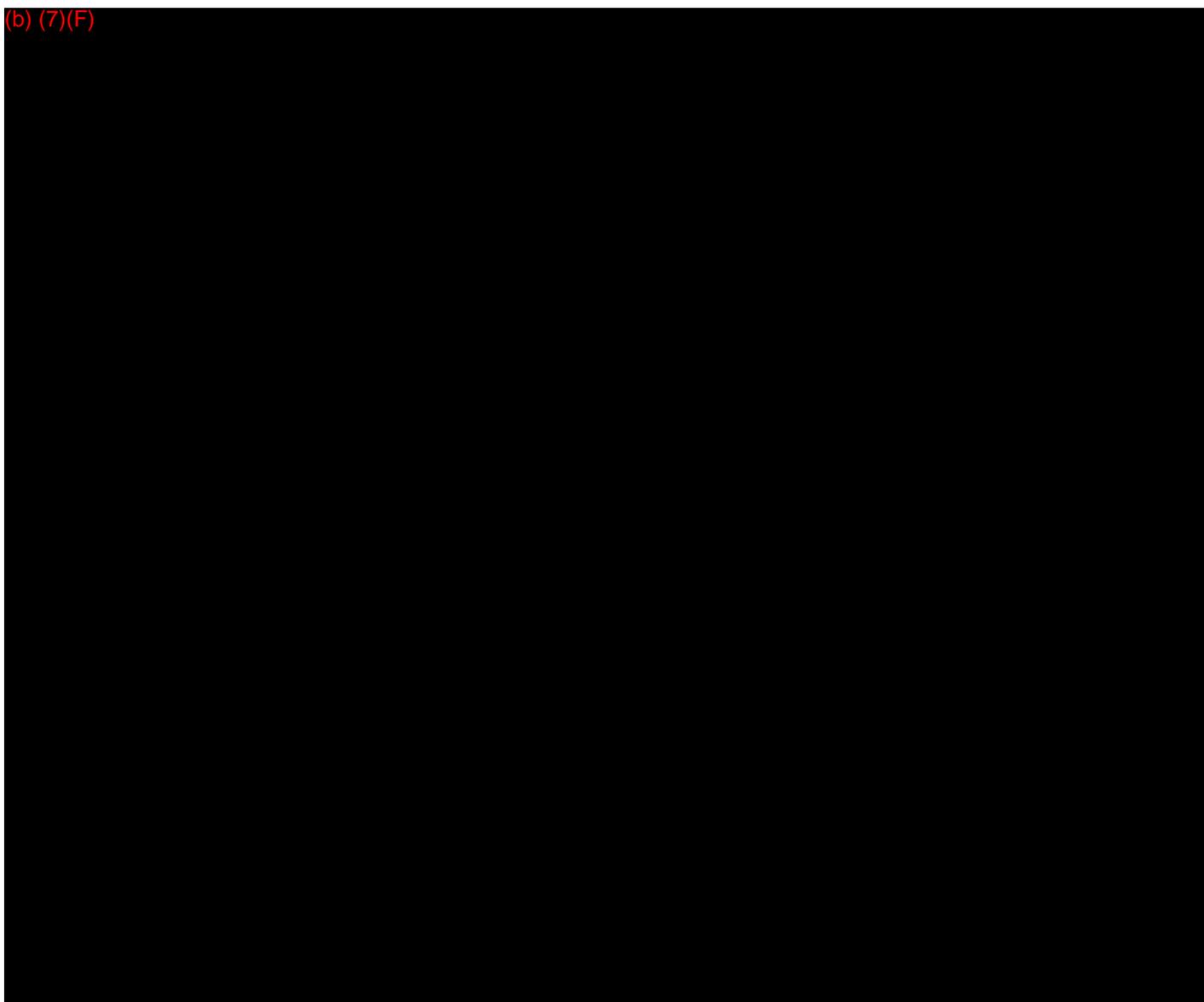
Incident name:	
Sample number:	Date sent:
Source of sample:	
Date sample data received:	
Waste hazardous:	Non-hazardous:
Permits/variances requested:	
Approval received on waste profile:	
Date disposal can begin:	
Disposal facilities:	
Profile number:	
Storage contractors:	
Waste transporters:	
PPE designated and agrees with Site Safety and Health Plan:	

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Additional information:
Waste Coordinator:

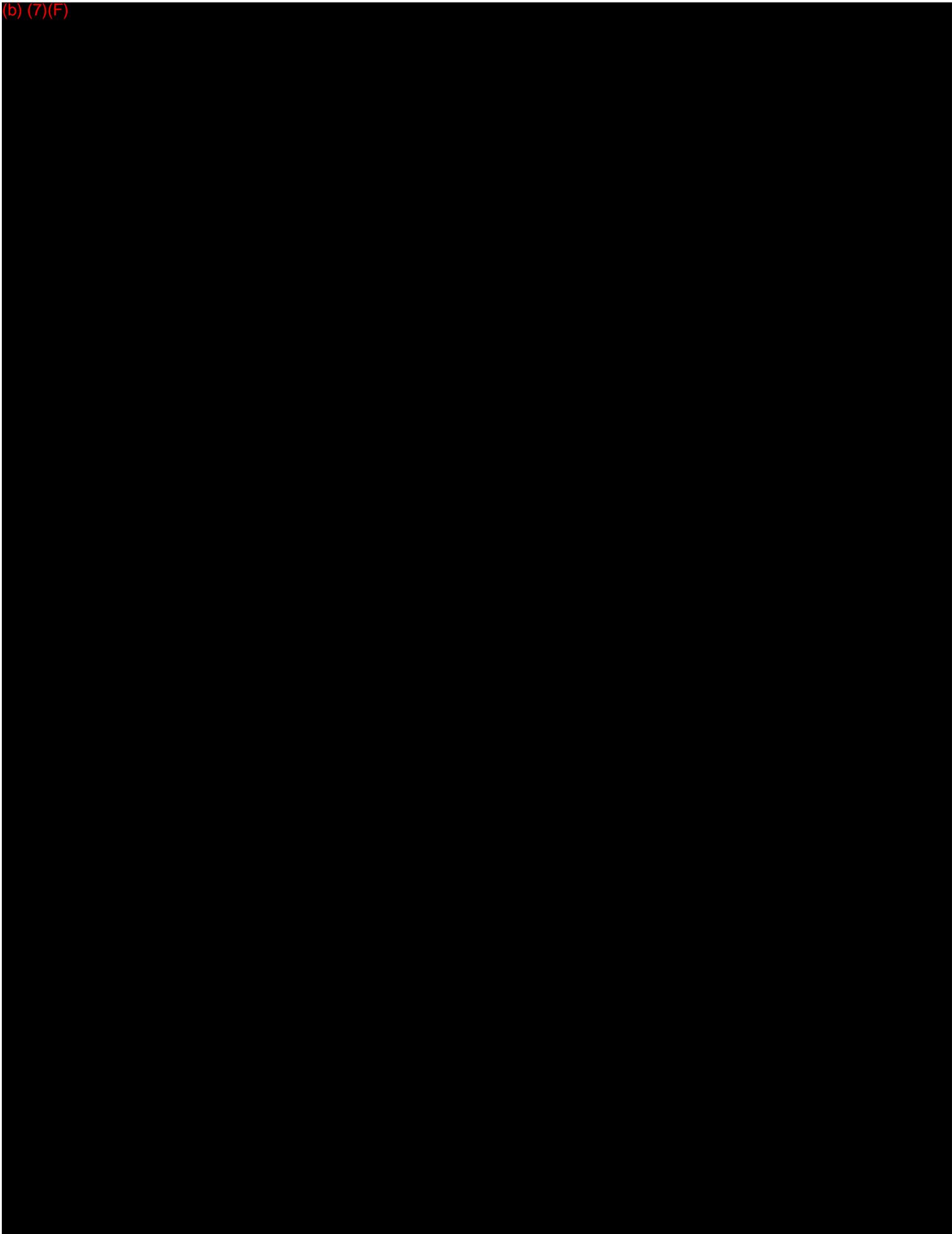
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5.6 INCIDENT SECURITY PLAN



(b) (7)(F)

(b) (7)(F)



(b) (7)(F)

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5.7 DEMOBILIZATION PLAN

Incident name:	Location:
Effective date of plan:	Effective time period of plan:
Spill location:	Plan prepared by:

Demobilization procedures:

- Operations Section will determine which resources are ready for release from a specific collection site
- The Planning Section will provide guidance on release priorities and demobilization recommendations
- Information maintained by the Planning Section will be utilized to assist in the prioritization
- Each incident will require a Decontamination Area
- Decontaminated equipment will be returned to appropriate staging area for release or re-deployment
- Transports for equipment will be required if remote from staging area
- The Planning Section will document all demobilization and decontamination activities
- Equipment designated for re-assignment will be mobilized to the appropriate staging area
- The Division Supervisor will ensure a log is maintained documenting that proper decontamination procedures are performed for each piece of equipment
- The Operations Section will ensure that redeployed personnel receive proper rest prior to returning to duty
- The Planning Section Chief will monitor personnel redeployment activities to ensure number of hours worked is within acceptable guidelines
- The Operations Section Chief must approve the Demobilization Plan before decontamination, release, or redeployment of any resources

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5.8 ALTERNATIVE RESPONSE TECHNIQUES

FIGURE 5.8-1 - ALTERNATIVE STRATEGIES CHECKLIST

EVALUATE ALTERNATIVE STRATEGIES (OIL SPILLS ONLY)	INITIALS	DATE & TIME STARTED	DATE & TIME COMPLETE
In-Situ Burning			
Flood and Flush			
Bioremediation/Nutrient Application			
Dispersants/Surfactants			
Gelling/Solidifying Agents			
Sorbents			

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FIGURE 5.8-2 - IN-SITU BURN PLAN

1. GENERAL INFORMATION			
Incident Name:			
Date/Time of Incident:		am/pm	
Product Spilled:			
Quantity Spilled:			
API or Specific Gravity		API/S.G. (circle one)	
MSDS Attached: Yes/No (circle one)			
2. BURN SPECIFICS			
Area to be Burned:			
Total Area:		acres/sq.ft./sq. yds./Sq. miles (circle one)	
Map Attached: Yes/No (circle one)			
Property Owner		Phone:	
Notified: Yes/No (circle one)		If yes, Date:	Time:
Comments:			
Fire Control and Containment Measures			
Igniter:			
Quantity:			
Application Method:			
Ignition Method:			
MSDS Attached: Yes/No (circle one)			
3. IMPACT ASSESSMENT			

Nearest Population Center:	
Distance and Direction:	
Local Authorities Notified: Yes/No (circle one)	
If yes, Date:	Time:
Affected Environment (circle all applicable): Woodland / Grassland / Wooded / Swamp / Marsh	
River / Stream / Open Water / Other (specify)	
Water Depth:	
Current Speed:	Direction:
Tide Forecast for Burn Time:	
Impacted Vegetation:	
Impacted Wildlife:	

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FIGURE 5.8-2 - IN-SITU BURN PLAN, CONTINUED

3. IMPACT ASSESSMENT, CONTINUED		
Biologist/Botanist/Ecologist Consulted Yes/No (circle one)		
If Yes, Name:	Date:	Time:
Comments:		
Monitoring to be Performed:		
Air Quality:	Frequency:	
Water Quality:	Frequency:	
Other:	Frequency:	
Weather		
Current:	Wind Speed:	Direction:
	Air Temperature:	Water Temperature:
	Sea State:	Precipitation:
Forecast:	Wind Speed:	Direction:
	Air Temperature:	Water Temperature:
	Sea State:	Precipitation:
4. POST-BURN OPERATIONS		
Residue Recovery and Disposal:		
Long-Term Environmental Monitoring:		

5. REVIEW AND APPROVAL

Safety Plan Reviewed: Yes/No (circle one)

If yes, Date:

Time:

Environmental Review: Yes/No (circle one)

If yes, Date:

Time:

Signatures:

Federal On-Scene Coordinator

Date:

State On-Scene Coordinator

Date:

Responsible Party

Date:

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FIGURE 5.8-3 - BIOREMEDIATION CHECKLIST

BIOREMEDIATION CHECKLIST	
SPILL DATA/INCIDENT INFORMATION	
Cause (specific):	
Date/Time:	
Location:	
Volume and Type of Release (continuous, intermittent):	
Potential Volume to be Released:	
Confidence in Data (high, medium, low):	
CHARACTERISTIC OF SPILLED OIL	
Oil Type/Name:	
Specific Gravity:	% Asphaltenes:
API Gravity:	Flash Point:
Pour Point:	Viscosity:
% Aromatics:	% Saturates:

WEATHER AND WATER CONDITIONS/FORECAST (48-HR)

Water Temp:	Air Temp:
Current:	Wind Speed:
Salinity:	Wind Direction:
Water Depth:	Sea State:
Tide Info:	
Comments:	

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FIGURE 5.8-3 - BIOREMEDIATION CHECKLIST, CONTINUED

NAME	PRODUCT 1	PRODUCT 2	PRODUCT 3
Manufacturer			
EPA Listed			
State Licensed			
Stockpile Location			
Point of Contact			
When Available			
Amount Available			
Amount Needed			
Amount on Hand			
Toxicity			
Type (concentrate/mix)			
Physical Reactivity			
Applicability on Oil			
Efficiency (% projected)			
Application Means			
Positive Dosage Control			
Dosage Rate Settings			
Dosage Charts Available			
Bioremediation Application Information/Evaluation:			

Proposed Bioremediation Application Plan:

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FIGURE 5.8-4 - DISPERSANT PLAN

SPILL INFORMATION

Incident Name:
Vessel or Facility Name:
Date/Time Spill Occurred:
Location of Spill:
Type of Oil Spilled:

WEATHER ON SCENE

Wind Speed and Direction:	
Temperature of Air (?C/?F):	Temperature of Water (?C/?F):
Visibility & Precipitation:	
Sea State:	
Ceiling:	

DISPERSANT USE PRE-BRIEF

AIRCRAFT ASSIGNMENTS

TITLE	AIRCRAFT ASSIGNED	TACTICAL CALL SIGN	ETD	ETA
SPOTTER(S)				
SPRAYER(S)				
OBSERVER(S)				
MONITOR(S)				

ENTRY/EXIT POINTS/ALTITUDES

	AIRPORT DESIGNATOR/NAVAID	RADIAL/DME	LAT/LONG	ALTITUDE
ENTRY:				
EXIT:				
SPILL SITE:				

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FIGURE 5.8-4 - DISPERSANT PLAN, CONTINUED**AIRCRAFT SEPARATION ALTITUDES**

AIRCRAFT/CALL SIGN	SPRAY ALTITUDE	PATTERN ALTITUDE
(SPRAYER)		
(SPOTTER)	N/A	500?
(OBSERVER)	N/A	1000?
(SPRAYER)		
(SPRAYER)		

DISPERSANT INFORMATION

Dispersant Name:
Source of Dispersant:
Dispersant to Oil Ratio of Application:
Application Rate (gal/acre):
Droplet Size (microns):
Total amount of dispersant to be used:

SPRAYER AIRCRAFT

SWATH WIDTH	(ft)	(ft)	(ft)
SPEED OF ADVANCE	(kts)	(kts)	(kts)

COMMUNICATIONS (complete only as needed; primary/secondary)

air to air	VHF <input type="checkbox"/>	UHF <input type="checkbox"/>	other <input type="checkbox"/>
air to vessel	VHF <input type="checkbox"/>	UHF <input type="checkbox"/>	other <input type="checkbox"/>
air to ground	VHF <input type="checkbox"/>	UHF <input type="checkbox"/>	other <input type="checkbox"/>
ground to vessel	VHF <input type="checkbox"/>	UHF <input type="checkbox"/>	other <input type="checkbox"/>
vessel to vessel	VHF <input type="checkbox"/>	UHF <input type="checkbox"/>	other <input type="checkbox"/>

POST DISPERSANT USE INFORMATION SORTIE

Total amount of dispersant used:			
Time dispersant application began:			
Time dispersant application ended:			

DEBRIEF

Did the dispersant operation follow the approved plan?
What problems were encountered?
What recommendations would you make?

SECTION 6

SENSITIVE AREAS / RESPONSE TACTICS

6.1 Introduction

6.2 Spill Containment / Recovery

Figure 6.2-1 - Response Tactics for Various Shorelines

6.3 Sensitive Area Protection

Figure 6.3-1 - Sensitive Area Protection Implement Sequence

Figure 6.3-2 - Summary of Shoreline and Terrestrial Cleanup Techniques

6.4 Alternative Response Strategies

6.4.1 Dispersants

6.4.2 Bioremediation

6.4.3 In-Situ Burn

Figure 6.4-1 - Alternate Strategies Checklist

Figure 6.4-2 - Decision Guide for the Federal Bioremediation Approval Process

6.5 Wildlife Protection and Rehabilitation

6.6 Endangered and Threatened Species by State

6.7 Terminal Map Feature Index

6.8 Terminal Sensitivity Mapping

6.9 Pipeline Map Feature Index

6.10 Pipeline Sensitivity Mapping

6.1 INTRODUCTION

- Sensitive resources that may be impacted by a spill must be identified.
- Protection strategies and priorities for allocated response resources must be identified and implemented.
- This section identifies ecologically and culturally/economically sensitive resources that may be impacted by an off-site spill from the Facility.

6.2 SPILL CONTAINMENT / RECOVERY

Containment and recovery refer to techniques that can be employed to contain and recover terrestrial and aquatic petroleum spills.

Terrestrial spills typically result from pipeline or tank leaks. The Company is equipped with secondary containment systems for areas with non-pressurized storage tanks. Spills occurring within the secondary containment area or along the pipeline areas should be contained at or near their source to minimize the size of the cleanup area and quantity of soil affected.

Containment is most effective when conducted near the source of the spill, where the oil has not spread over a large area and the contained oil is of sufficient thickness to allow effective recovery and/or cleanup. The feasibility of effectively implementing containment and recovery techniques is generally dependent upon the size of the spill, available logistical resources, implementation time, and environmental conditions or nature of the terrain in the spill area.

For terrestrial spills, trenches and earthen berms or other dams are most often used to contain oil migration on the ground surface. Recovery of free oil is best achieved by using pumps, vacuum sources, and/or sorbents.

Spills that reach water spread faster than those on land. They also have greater potential to contaminate water supplies, to affect wildlife and populated areas, and to impact manmade structures and human activities. Responses on water should therefore emphasize stopping the spill, containing the oil near its source, and protecting sensitive areas before they are impacted.

Sorbents are used to remove minor on water spills. For larger spills, booming is used to protect sensitive areas and to position oil so it can be removed with skimmers or vacuum trucks.

Due to entrainment, booming is not effective when the water moves faster than one knot or waves exceed 1.5 feet in height. Angling a boom will minimize entrainment. Using multiple, parallel booms will also improve recovery in adverse conditions. Following is a summary of containment techniques.

Containment/Diversion
Berming • Berms are constructed ahead of advancing surface spills to contain spill or divert spill to a containment area

- May cause disturbance of soils and some increased soil penetration
-

Blocking/Flow-Through Dams

- Construct dam in drainage course/stream bed to block and contain flow of spill. Cover with plastic sheeting. If water is flowing install inclined pipes during dam construction to pass water underneath dam
 - May increase soil penetration
-

Culvert Blocking

- Block culvert with plywood, sandbags, sediments, etc. to prevent oil from entering culvert
-

Interception Trench

- Excavate ahead of advancing surface spill to contain spill and prevent further advancement; cover bottom and gradients with plastic
 - May cause disturbance of soils and increased soil penetration
-

Containment booming

- Boom is deployed around free oil
 - Boom may be anchored or left to move with the oil
-

Diversion booming

- Boom is deployed at an angle to the approaching oil
 - Oil is diverted to a less sensitive area
 - Diverted oil may cause heavy oil contamination to the shoreline downwind and down current
 - Anchor points may cause minor disturbance to the environment
-

Exclusion booming

- Boom is placed around a sensitive area or across an inlet, a river mouth, a creek mouth, or a small bay
 - Approaching oil is contained or deflected (diverted) by the boom
 - Anchor points may cause minor disturbance to the environment
-

- Sorbent booming**
- Used only on quiet water with minor oil contamination
 - Boom is anchored along a shoreline or used in a manner described above
 - May use boom made of sorbent material or may pack sorbent material between multiple booms placed parallel to each other

Other cleanup methods include: natural recovery, manual removal/scraping, low-pressure flushing, warm water washing, and burning. Berms and dams are also used in shallow waterways to protect areas.

Cleanup methods are provided in the appropriate Area Contingency Plan (ACP), NOAA's "Shoreline Assessment Manual," and NOAA's "Options for Minimizing Environmental Impacts of Freshwater Spill Response." (See <http://response.restoration.noaa.gov> for the latter two.)

FIGURE 6.2-1 - RESPONSE TACTICS FOR VARIOUS SHORELINES

TYPES	DESCRIPTION	PREDICTED OIL IMPACT	RECOMMENDED CLEANUP ACTIVITY
Developed/ Unforested land	<ul style="list-style-type: none"> • This class includes towns, cities, farms, pastures, fields, reclaimed wetlands, and other altered areas • Organisms and algae may be common in riprap structures and on pilings 	<ul style="list-style-type: none"> • Oil would percolate easily between the gravel and boulders of riprap structures • Oil would coat the intertidal areas of solid structures • Biota would be damaged or killed under heavy accumulations 	<ul style="list-style-type: none"> • May require high pressure spraying: <ul style="list-style-type: none"> • To remove oil • To prepare substrate for recolonization of barnacle and oyster communities • For aesthetic reasons
Freshwater Flat	<ul style="list-style-type: none"> • Mud or organic deposits located along the shore or in shallow portions of nontidal freshwater lakes and ponds • They are exposed to low wave and current energy 	<ul style="list-style-type: none"> • Oil is expected to be deposited along the shoreline • Penetration of spilled oil into the water-saturated sediments of the flat will not occur • When sediments are contaminated, oil may persist for 	<ul style="list-style-type: none"> • These areas require high priority for protection against oil contamination • Cleanup of freshwater flats is nearly impossible because of soft substrate • Cleanup is usually not even considered

	<ul style="list-style-type: none"> • They are often areas of heavy bird use 	years	<p>because of the likelihood of mixing oil deeper into the sediments during the cleanup effort</p> <ul style="list-style-type: none"> • Passive efforts, such as sorbent boom can be used to retain oil as it is naturally removed
Fresh Marsh	<ul style="list-style-type: none"> • Found along freshwater ponds and lakes • These marshes have various types of vegetative cover, including floating aquatic mats, vascular submerged vegetation, needle and broad-leaved deciduous scrubs and shrubs, and broad-leaved evergreen scrubs and shrubs • Birds and mammals extensively use fresh marshes for feeding and breeding purposes 	<ul style="list-style-type: none"> • Small amounts of oil will contaminate the outer marsh fringe only; natural removal by wave action can occur within months • Large spills will cover more area and may persist for decades • Oil, particularly the heavy fuel oils, tends to adhere readily to marsh grasses 	<ul style="list-style-type: none"> • Marshes require the highest priority for shoreline protection • Natural recovery is recommended when: <ul style="list-style-type: none"> • A small extent of marsh is affected • A small amount of oil impacts the marsh fringe • The preferred cleanup method is a combination of low-pressure flushing, sorption, and vacuum pumping performed from boats • Any cleanup activities should be supervised closely to avoid excessive disturbances of the marsh surface or roots • Oil wrack and other debris may be removed by hand
Swamp	<ul style="list-style-type: none"> • Swamps are freshwater wetlands having varying water depths with vegetation types ranging from shrubs and scrubs to poorly drained forested wetlands. Major vegetative types include: 	<ul style="list-style-type: none"> • Even small amounts of spilled oil can spread through the swamp • Large spills will cover more area and may persist for decades since water-flushing rates are low • Oil, particularly the heavy fuel oils, will 	<ul style="list-style-type: none"> • No cleanup recommended under light conditions • Under moderate to heavy accumulations, to prevent chronic oil pollution of surrounding areas placement of sorbent along fringe swamp forest (to absorb oil as it is slowly

	<p>scrubs, shrubs, evergreen trees, and hardwood forested woodlands</p> <ul style="list-style-type: none"> • Birds and mammals use swamps during feeding and breeding activities 	<p>adhere to swamp vegetation</p> <ul style="list-style-type: none"> • Unlike mangroves, the roots of swamp forest trees are not exposed; thus, little damage to trees is expected. Any underbrush vegetation, however, would be severely impacted 	<p>released) may be effective under close scientific supervision</p> <ul style="list-style-type: none"> • Proper strategic boom placement may be highly effective in trapping large quantities of oil, thus reducing oil impact to interior swamp forests • Oil trapped by boom can be reclaimed through the use of skimmers and vacuums
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FIGURE 6.2-1 - RESPONSE TACTICS FOR VARIOUS SHORELINES, CONTINUED

TYPES	DESCRIPTION	PREDICTED OIL IMPACT	RECOMMENDED CLEANUP ACTIVITY
Open water	<ul style="list-style-type: none"> • Have ocean like waves and currents • Weather changes effect on-water conditions • River mouths present problems • Thermal stratification occurs 	<ul style="list-style-type: none"> • Most organisms are mobile enough to move out of the spill area • Aquatic birds are vulnerable to oiling • Human usage (such as transportation, water intakes, and recreational activities) may be restricted 	<ul style="list-style-type: none"> • Booming, skimming, vacuuming, and natural recovery are the preferred cleanup methods • Should not use sorbents, containment booming, skimming, and vacuuming on gasoline spills • Cleanup options include physical herding, sorbents, and debris/vegetation removal
Large rivers	<ul style="list-style-type: none"> • May have varying salinities, meandering channels, and high flow rates • May include manmade structures (such as dams and locks) • Water levels vary seasonally 	<ul style="list-style-type: none"> • Fish and migratory birds are of great concern • Under flood conditions, may impact highly sensitive areas in floodplains • Human usage may be high • When sediments are 	<ul style="list-style-type: none"> • Booming, skimming, and vacuuming are the preferred cleanup methods • Should not use sorbents, containment booming, skimming, and vacuuming on gasoline spills • Cleanup options include natural

	<ul style="list-style-type: none"> Floods generate high suspended sediment and debris loads 	contaminated, oil may persist for years	recovery, physical herding, sorbents, and debris/vegetation removal
Small lakes and ponds	<ul style="list-style-type: none"> Water surface can be choppy Water levels can fluctuate widely May completely freeze in winter Bottom sediments near the shore can be soft and muddy Surrounding area may include wet meadows and marshes 	<ul style="list-style-type: none"> Wildlife and socioeconomic areas likely to be impacted Wind will control the oil's distribution 	<ul style="list-style-type: none"> Booming, skimming, vacuuming, and sorbents are the preferred cleanup methods Should not use containment booming, vacuuming, sorbents, and skimming on gasoline spills Cleanup options include physical herding, sorbents, and debris/vegetation removal
Small rivers and streams	<ul style="list-style-type: none"> Wide range of water bodies - fast flowing streams to slow moving bayous with low muddy banks and fringed with vegetation May include waterfalls, rapids, log jams, mid-channel bars, and islands Weathering rates may be slower because spreading and evaporation are restricted 	<ul style="list-style-type: none"> Usually contaminate both banks and the water column, exposing a large number of biota to being oiled Water intakes for drinking water, irrigation, and industrial use likely to be impacted 	<ul style="list-style-type: none"> Booming, skimming, vacuuming, sorbents, barriers, and berms are the preferred cleanup methods Should not use containment booming, sorbents, vacuuming, and skimming on gasoline spills Cleanup options include physical herding, natural recovery, debris removal, vegetation removal, and in-situ burn

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6.3 SENSITIVE AREA PROTECTION

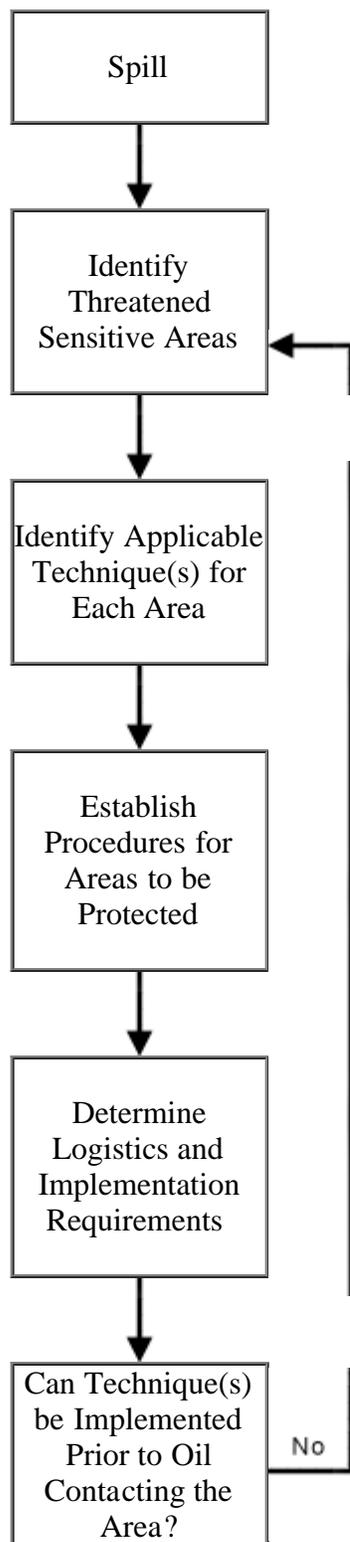
Protection refers to the implementation of techniques or methods to prevent oil from making contact with a shoreline or aquatic area that is determined to be sensitive for environmental, economic, cultural, or human use reasons. Implementation of sensitive area protection techniques must consider a number of factors such as sensitive features, priorities for areas to be protected, and potential degree of impact. In the event a product spill reaches a major area

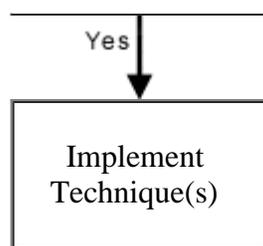
waterway, it may be necessary to protect downstream sensitive areas if it appears that local containment and recovery efforts will not be sufficient to control the entire spill. Major waterways and specific sensitive areas located downstream of the facility/pipeline are provided in SECTION 6.10.

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FIGURE 6.3-1 - SENSITIVE AREA PROTECTION IMPLEMENT SEQUENCE





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FIGURE 6.3-2 - SUMMARY OF SHORELINE AND TERRESTRIAL CLEANUP TECHNIQUES

TECHNIQUE	DESCRIPTION	RECOMMENDED EQUIPMENT	APPLICABILITY	POTENTIAL ENVIRONMENTAL EFFECTS
Removal				
1. Manual Removal	Hand tool (scrapers, wire brushes, shovels, cutting tools, wheel barrows, etc.) are used to scrape oil off surfaces or recover oiled sediments, vegetation, or debris where oil conditions are light or sporadic and/or access is limited.	<u>Equipment</u> misc. hand tools <u>Personnel</u> 10-20 workers	<ul style="list-style-type: none"> • Can be used on all habitat types • Light to moderate oiling conditions for stranded oil or heavy oils that have formed semi-solid to solid masses • In areas where roosting or birthing animals cannot or should not be disturbed 	<ul style="list-style-type: none"> • Sediment disturbance and erosion potential
2. Mechanical Removal	Mechanical earthmoving equipment is used to remove oiled sediments and debris from heavily impacted areas with suitable access.	<u>Equipment</u> motor grader, backhoe, dump truck elevating scrapers <u>Personnel</u> 2-4 workers plus equipment operators	<ul style="list-style-type: none"> • On land, wherever surface sediments are accessible to heavy equipment • Large amounts of oiled materials 	<ul style="list-style-type: none"> • Removes upper 2 to 12 inches of sediments

3. Sorbent Use	Sorbents are applied manually to oil accumulations, coatings, sheens, etc. to remove and recover the oil.	<u>Equipment</u> misc. hand tools misc. sorbents <u>Personnel</u> 2-10 workers	<ul style="list-style-type: none"> • Can be used on all habitat types • Free-floating oil close to shore or stranded on shore, secondary treatment method after gross oil removal • Sensitive areas where access is restricted 	<ul style="list-style-type: none"> • Sediment disturbance and erosion potential • Trampling of vegetation and organisms • Foot traffic can work oil deeper into soft sediments
4. Vacuum / Pumps / Skimmers	Pumps, vacuum trucks, skimmers are used to remove oil accumulations from land or relatively thick floating layers from the water.	<u>Equipment</u> 1-2 50- to 100-bbl vacuum trucks w/hoses 1-2 nozzle screens or skimmer heads <u>Personnel</u> 2-6 workers plus truck operators	<ul style="list-style-type: none"> • Can be used on all habitat types • Stranded oil on the substrate • Shoreline access points 	<ul style="list-style-type: none"> • Typically does not remove all oil • Can remove some surface organisms, sediments, and vegetation
Washing				
5. Flooding	High volumes of water at low pressure are used to flood the oiled area to float oil off and out of sediments and back into the water or to a containment area where it can be recovered.? Frequently used with flushing.	<u>Equipment</u> 1-5 100- to 200-gpm pumping systems 1 100-ft perforated header hose per system 1-2 200-ft containment booms per system 1 oil recovery device per system <u>Personnel</u> 6-8 workers per system	<ul style="list-style-type: none"> • All shoreline types except steep intertidal areas • Heavily oiled areas where the oil is still fluid and adheres loosely to the substrate • Where oil has penetrated into gravel sediments • Used with other washing techniques 	<ul style="list-style-type: none"> • Can impact clean downgradient areas • Can displace some surface organisms if present • Sediments transported into water can affect water quality

**FIGURE 6.3-2 - SUMMARY OF SHORELINE AND TERRESTRIAL CLEANUP
TECHNIQUES,
CONTINUED**

TECHNIQUE	DESCRIPTION	RECOMMENDED EQUIPMENT	APPLICABILITY	POTENTIAL ENVIRONMENTAL EFFECTS
Washing, Continued				
6. Flushing	Water streams at low to moderate pressure, and possibly elevated temperatures, are used to remove oil from surface or near-surface sediments through agitation and direct contact. ? Oil is flushed back into the water or a collection point for subsequent recovery. ? May also be used to flush out oil trapped by shoreline or aquatic vegetation.	<u>Equipment</u> 1-5 50- to 100-gpm/100-psi pumping systems with manifold 1-4 100-ft hoses and nozzles per system 1-2 200-ft containment booms per system 1 oil recovery device per system <u>Personnel</u> 8-10 workers per system	<ul style="list-style-type: none"> • Substrates, riprap, and solid man-made structures • Oil stranded onshore • Floating oil on shallow intertidal areas 	<ul style="list-style-type: none"> • Can impact clean downgradient areas • Will displace many surface organisms if present • Sediments transported into water can affect water quality • Hot water can be lethal to many organisms • Can increase oil penetration depth
7. Spot (High Pressure Washing)	High pressure water streams are used to remove oil coatings from hard surfaces in small areas where flushing is ineffective. ? Oil is directed back into water or collection point for subsequent recovery.	<u>Equipment</u> 1-5 1,200- to 4,000-psi units with hose and spray wand 1-2 100-ft containment booms per unit 1 oil recovery device per unit <u>Personnel</u> 2-4 workers per unit	<ul style="list-style-type: none"> • Bedrock, man-made structures, and gravel substrates • When low-pressure flushing is not effective • Directed water jet can remove oil from hard to reach sites 	<ul style="list-style-type: none"> • Will remove most organisms if present • Can damage surface being cleaned • Can affect clean downgradient or nearby areas
In Situ				
8. Passive Collection	Sorbent/snare booms or other	<u>Equipment</u> 1,000-2,000 ft	<ul style="list-style-type: none"> • All shoreline types 	<ul style="list-style-type: none"> • Significant amounts of oil

	sorbent materials are anchored at the waterline adjacent to heavily oiled areas to contain and recover oil as it leaches from the sediments.	sorbent/snare boom 200-400 stakes or anchor systems <u>Personnel</u> 4-10 workers	<ul style="list-style-type: none"> • Calm wave action • Slow removal process 	can remain on the shoreline for extended periods of time
9. Sediment Tilling	Mechanical equipment or hand tools are used to till lightly to moderately oiled surface sediments to maximize natural degradation processes.	<u>Equipment</u> 1 tractor fitted with tines, dicer, ripper blades, etc. or 1-4 rototillers or 1 set of hand tools <u>Personnel</u> 2-10 workers	<ul style="list-style-type: none"> • Any sedimentary substrate that can support heavy equipment • Sand and gravel beaches with subsurface oil • Where sediment is stained or lightly oiled • Where oil is stranded above normal high waterline 	<ul style="list-style-type: none"> • Significant amounts of oil can remain on the shoreline for extended periods of time • Disturbs surface sediments and organisms

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FIGURE 6.3-2 - SUMMARY OF SHORELINE AND TERRESTRIAL CLEANUP TECHNIQUES, CONTINUED

TECHNIQUE	DESCRIPTION	RECOMMENDED EQUIPMENT	APPLICABILITY	POTENTIAL ENVIRONMENTAL EFFECTS
In Situ, Continued				
10. In Situ Bioremediation	Fertilizer is applied to lightly to moderately oiled areas to enhance microbial growth and subsequent biodegradation	<u>Equipment</u> 1-2 fertilizer applicators 1 tilling device if required <u>Personnel</u> 2-4 workers	<ul style="list-style-type: none"> • Any shoreline habitat type where nutrients are deficient Moderate to heavily oiled 	<ul style="list-style-type: none"> • Significant amounts of oil can remain on the shoreline for extended periods of time • Can disturb surface

	of oil.		substrates After other techniques have been used to remove free product on lightly oiled shorelines Where other techniques are destructive or ineffective	sediments and organisms
11. Log/Debris?? Burning	Oiled logs, driftwood, vegetation, and debris are burned to minimize material handling and disposal requirements.? Material should be stacked in tall piles and fans used to ensure a hot, clean burn.	<u>Equipment</u> 1 set of fire control equipment 2-4 fans 1 supply of combustion promoter <u>Personnel</u> 2-4 workers	<ul style="list-style-type: none"> • On most habitats except dry muddy substrates where heat may impact the biological productivity of the habitat • Where heavily oiled items are difficult or impossible to move • Many potential applications on ice 	<ul style="list-style-type: none"> • Heat may impact local near-surface organisms • Substantial smoke may be generated • Heat may impact adjacent vegetation
12. Natural Recovery	No action is taken and oil is allowed to degrade naturally.	None required	<ul style="list-style-type: none"> • All habitat types • When natural removal rates are fast • Degree of oiling is light • Access is severely restricted or dangerous to cleanup crews • When cleanup actions will 	<ul style="list-style-type: none"> • Oil may persist for significant periods of time • Remobilized oil or sheens may impact other areas • Higher probability of impacting wildlife

			do more harm than natural removal	
13. Dispersants (Pursuant to Texas Administrative Code, Title 31, Part 1, Chapter 19, Subchapter B, Rule 19.13 (c) (10), facility personnel are prohibited from utilizing dispersants during oil spill response operations in water. These products require written approval from the Regional Response Team, within the framework of the applicable Area Contingency Plan. Such approval is not currently granted.)	Dispersants are used to reduce the oil/water interfacial tension thereby decreasing the energy needed for the slick to break into small particles and mix into the water column. ? Specially formulated products containing surface-active agents are sprayed from aircraft or boats onto the slick.	Dispersants Boat or aircraft	<ul style="list-style-type: none"> • Water bodies with sufficient depth and volume for mixing and dilution • When the impact of the floating oil has been determined to be greater than the impact of dispersed oil on the water-column community 	<ul style="list-style-type: none"> • Use in shallow water could affect benthic resources • May adversely impact organisms in the upper 30 feet of the water column • Some water-surface and shoreline impacts could occur
1 - Per 1000 feet of shoreline or oiled area				

Cleanup methods are provided in the appropriate Area Contingency Plan (ACP), NOAA's "Shoreline Assessment Manual," and NOAA's "Options for Minimizing Environmental Impacts of Freshwater Spill Response." (See <http://response.restoration.noaa.gov> for the latter two.)

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6.4 ALTERNATIVE RESPONSE STRATEGIES

Non-mechanical methods for cleanup operations could involve the use of chemical cleaning products or appropriate bioremediation products. A checklist for evaluating different alternate strategies is present in **FIGURE 6.4-1**.

6.4.1 Dispersants

While physical removal is the most common method for eliminating spilled oil from the environment, mechanical removal may be limited by equipment capability, weather, sea conditions, and spill magnitude. An alternative strategy for reducing impacts from oil spills is to disperse the oil into the water by breaking it into small droplets and suspending them in the water. This process occurs naturally very slowly but can be accelerated by the application of a dispersant.

A dispersant is an agent (surfactant) which reduces the surface tension of the oil and water and allows them to mix more readily. In the presence of sufficient mixing energy supplied by waves, wind, or man-made turbulence, the oil can remain suspended in the water column resisting resurfacing and re-coalescing. Dispersants may be effective in areas where environmental or logistical considerations do not allow the deployment of cleanup equipment and personnel, and may reduce the overall level of effort and manpower requirement and personnel necessary for responding to major spills.

The Company will not use dispersants without the concurrence of the FOSC. Dispersants will not be used without concurrence of the EPA and the state with jurisdiction over the affected waters. Refer to the NCP for dispersant use policies and procedures.

6.4.2 Bioremediation

Bioremediation is the process of stimulating the growth and activity of microorganisms such as bacteria and fungi that naturally feed on hydrocarbons. It is conducted as a means of accelerating the natural biodegradation rates of stranded or floating oil. Biodegradation is a natural process by which the above microorganism, in the presence of nutrients and oxygen, chemically breakdown hydrocarbons and other substances and produce by-products including carbon dioxide, water, biomass, and partially oxidized products.

Biodegradation, together with physical processes such as evaporation and dispersion, are the primary natural mechanisms for the removal of hydrocarbons (oil spills) from the environment. This process generally occurs at a very low rate but can often be enhanced by the application of nutrients such as nitrogen, phosphorus, potassium, and others.

There are, however, instances on open seas or shorelines where standard recovery or cleanup techniques are not practical or will result in significant environmental or physical impacts. In these cases, bioremediation may be a viable response option and should be considered for use.

FIGURE 6.4-2 provides a federal decision guide for bioremediation consideration.

6.4.3 In-Situ Burn

In-Situ burning has been successfully used as a viable technique for mitigating oil spills off shore and in a marsh type environment. This is especially true of areas that have mostly grassy vegetation with little or no woody vegetation. In a grassy marshland environment, an In-Situ burn may produce less long-term damage to the environment than traditional mechanical cleanup methods.

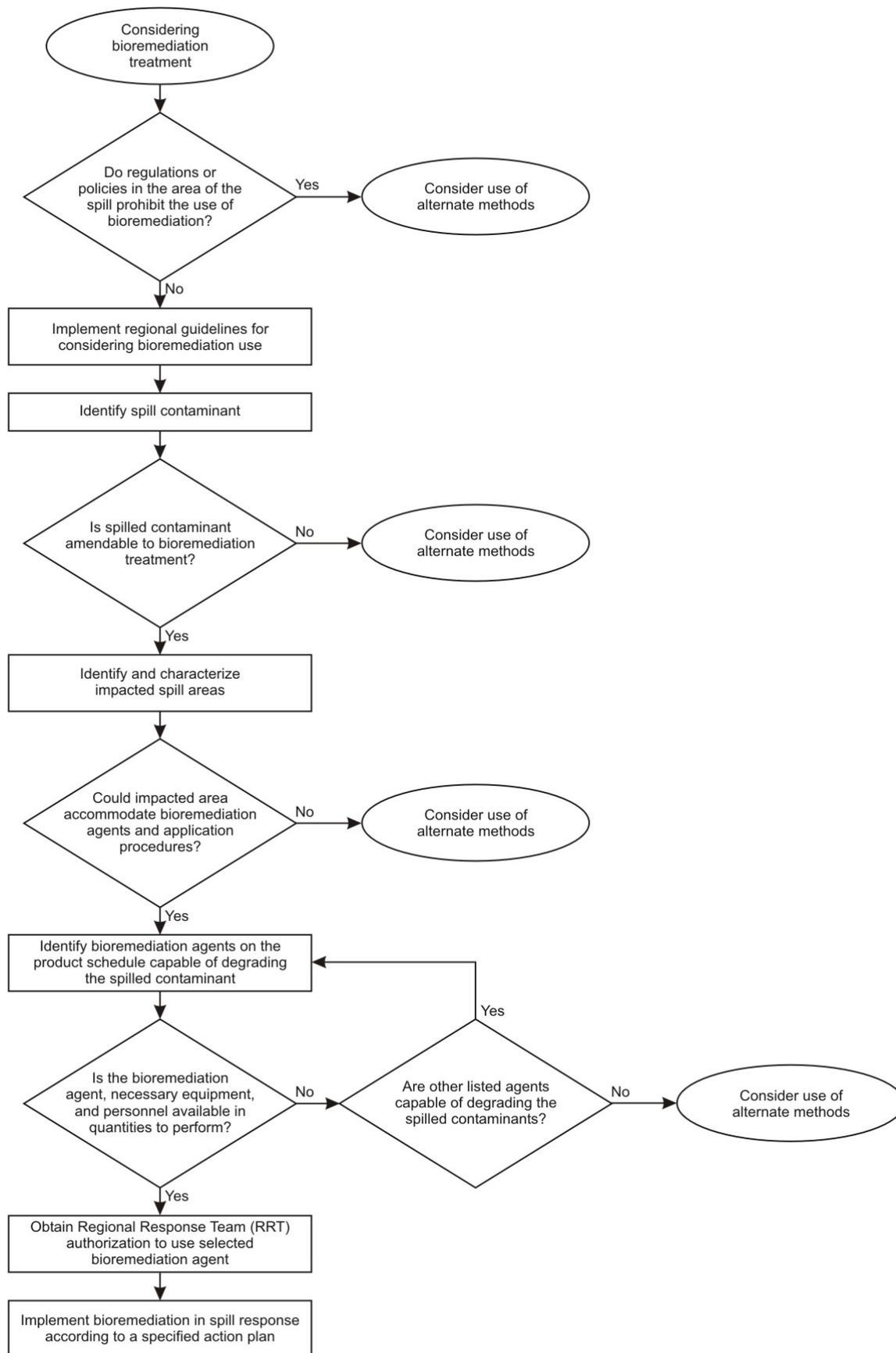
The Company will not use In-Situ Burn without the concurrence of the FOSC.

FIGURE 6.4-1 - ALTERNATE STRATEGIES CHECKLIST

Evaluate Alternate Strategies (oil spills only)	Initials	Date & Time Started	Date & Time Completed
No response			
In-situ burning			
Flood and flush			
Bioremediation/nutrient application			
Dispersants/surfactants			
Gelling/solidifying agents			
Sorbents			
Mechanical recovery			

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FIGURE 6.4-2 - DECISION GUIDE FOR THE FEDERAL BIOREMEDIATION APPROVAL PROCESS



- The Company will support wildlife protection and rehabilitation efforts during the response, but will not typically directly manage these efforts.
- Company personnel will not attempt to rescue or clean affected wildlife, because such actions may cause harm to the individuals or may place the animals at further risk.
- Federal and State agencies responsible for wildlife capture and rehabilitation will typically coordinate capturing and rehabilitating oiled wildlife; a list of these agencies is included in **FIGURE 3.4-1**.
- Wildlife Rehabilitation Specialists may be utilized to assist in capturing and rehabilitating oiled animals as well as deterring unaffected animals away from the spill site; a list of Wildlife Rehabilitation Specialists is included in **FIGURE 3.4-1**.

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6.6 ENDANGERED AND THREATENED SPECIES BY STATE

COMMON NAME	SCIENTIFIC NAME	STATUS	STATE
(No common name)	<i>Geocarpon minimum</i>	T	Texas
Ambrosia, south Texas	<i>Ambrosia cheiranthifolia</i>	E	Texas
Amphipod, Peck's cave	<i>Stygobromus (=Stygonectes) pecki</i>	E	Texas
Ayenia, Texas	<i>Ayenia limitaris</i>	E	Texas
Bat, Mexican long-nosed	<i>Leptonycteris nivalis</i>	E	Texas
Bear, Louisiana black	<i>Ursus americanus luteolus</i>	T	Texas
Beetle, American burying	<i>Nicrophorus americanus</i>	E	Texas
Beetle, Coffin Cave mold	<i>Batrisodes texanus</i>	E	Texas
Beetle, Comal Springs dryopid	<i>Stygoparnus comalensis</i>	E	Texas
Beetle, Comal Springs riffle	<i>Heterelmis comalensis</i>	E	Texas
Beetle, Helotes mold	<i>Batrisodes venyivi</i>	E	Texas
Beetle, Kretschmarr Cave mold	<i>Texamaurops reddelli</i>	E	Texas
Beetle, Tooth Cave ground	<i>Rhadine persephone</i>	E	Texas
Bladderpod, white	<i>Lesquerella pallida</i>	E	Texas
Bladderpod, Zapata	<i>Lesquerella thamnophila</i>	E	Texas
Cactus, black lace	<i>Echinocereus reichenbachii</i> var. <i>albertii</i>	E	Texas
Cactus, Chisos Mountain hedgehog	<i>Echinocereus chisoensis</i> var. <i>chisoensis</i>	T	Texas
Cactus, Lloyd's Mariposa	<i>Echinomastus mariposensis</i>	T	Texas

Cactus, Nellie cory	<i>Coryphantha minima</i>	E	Texas
Cactus, Sneed pincushion	<i>Coryphantha sneedii</i> var. <i>sneedii</i>	E	Texas
Cactus, star	<i>Astrophytum asterias</i>	E	Texas
Cactus, Tobusch fishhook	<i>Ancistrocactus tobuschii</i>	E	Texas
Cat's-eye, Terlingua Creek	<i>Cryptantha crassipes</i>	E	Texas
Cory cactus, bunched	<i>Coryphantha ramillosa</i>	T	Texas
Crane, whooping except where EXPN	<i>Grus americana</i>	E	Texas
Curlew, Eskimo	<i>Numenius borealis</i>	E	Texas
Darter, fountain	<i>Etheostoma fonticola</i>	E	Texas
Dawn-flower, Texas prairie	<i>Hymenoxys texana</i>	E	Texas

T - Threatened

E - Endangered

XN - Non-Essential

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6.6 ENDANGERED AND THREATENED SPECIES BY STATE, CONTINUED

COMMON NAME	SCIENTIFIC NAME	STATUS	STATE
Dogweed, ashy	<i>Thymophylla tephroleuca</i>	E	Texas
Eagle, bald Sonoran Desert DPS	<i>Haliaeetus leucocephalus</i>	T	Texas
Falcon, northern aplomado	<i>Falco femoralis septentrionalis</i>	E	Texas
Flycatcher, southwestern willow	<i>Empidonax traillii extimus</i>	E	Texas
Frankenia, Johnston's	<i>Frankenia johnstonii</i>	E	Texas
Gambusia, Big Bend	<i>Gambusia gaigei</i>	E	Texas
Gambusia, Clear Creek	<i>Gambusia heterochir</i>	E	Texas
Gambusia, Pecos	<i>Gambusia nobilis</i>	E	Texas
Gambusia, San Marcos	<i>Gambusia georgei</i>	E	Texas
Ground beetle, [unnamed]	<i>Rhadine exilis</i>	E	Texas
Ground beetle, [unnamed]	<i>Rhadine infernalis</i>	E	Texas
Harvestman, Bee Creek Cave	<i>Texella reddelli</i>	E	Texas
Harvestman, Bone Cave	<i>Texella reyesi</i>	E	Texas
Harvestman, Cokendolpher Cave	<i>Texella cokendolpheri</i>	E	Texas
Jaguarundi, Gulf Coast	<i>Herpailurus (=Felis) yagouaroundi cacomitli</i>	E	Texas
Ladies'-tresses, Navasota	<i>Spiranthes parksii</i>	E	Texas
Manatee, West Indian	<i>Trichechus manatus</i>	E	Texas

Manioc, Walker's	<i>Manihot walkerae</i>	E	Texas
Meshweaver, Braken Bat Cave	<i>Cicurina venii</i>	E	Texas
Meshweaver, Government Canyon Bat Cave	<i>Cicurina vespera</i>	E	Texas
Meshweaver, Madla's Cave	<i>Cicurina madla</i>	E	Texas
Meshweaver, Robber Baron Cave	<i>Cicurina baronia</i>	E	Texas
Minnow, Devils River	<i>Dionda diaboli</i>	T	Texas
Oak, Hinckley	<i>Quercus hinckleyi</i>	T	Texas
Ocelot	<i>Leopardus (=Felis) pardalis</i>	E	Texas
Owl, Mexican spotted	<i>Strix occidentalis lucida</i>	T	Texas
Phlox, Texas trailing	<i>Phlox nivalis ssp. texensis</i>	E	Texas
Pitaya, Davis' green	<i>Echinocereus viridiflorus var. davisii</i>	E	Texas

T - Threatened

E - Endangered

XN - Non-Essential

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6.6 ENDANGERED AND THREATENED SPECIES BY STATE, CONTINUED

COMMON NAME	SCIENTIFIC NAME	STATUS	STATE
Plover, piping except Great Lakes watershed	<i>Charadrius melodus</i>	T	Texas
Pondweed, Little Aguja (=Creek)	<i>Potamogeton clystocarpus</i>	E	Texas
Poppy-mallow, Texas	<i>Callirhoe scabriuscula</i>	E	Texas
Prairie-chicken, Attwater's greater	<i>Tympanuchus cupido attwateri</i>	E	Texas
Pseudoscorpion, Tooth Cave	<i>Tartarocreagris texana</i>	E	Texas
Pupfish, Comanche Springs	<i>Cyprinodon elegans</i>	E	Texas
Pupfish, Leon Springs	<i>Cyprinodon bovinus</i>	E	Texas
Rush-pea, slender	<i>Hoffmannseggia tenella</i>	E	Texas
Salamander, Barton Springs	<i>Eurycea sosorum</i>	E	Texas
Salamander, San Marcos	<i>Eurycea nana</i>	T	Texas
Salamander, Texas blind	<i>Typhlomolge rathbuni</i>	E	Texas
Sand-verbena, large-fruited	<i>Abronia macrocarpa</i>	E	Texas
Sawfish, smalltooth	<i>Pristis pectinata</i>	E	Texas
Sea turtle, green except where endangered	<i>Chelonia mydas</i>	T	Texas
Sea turtle, hawksbill	<i>Eretmochelys imbricata</i>	E	Texas

Sea turtle, Kemp's ridley	<i>Lepidochelys kempii</i>	E	Texas
Sea turtle, leatherback	<i>Dermochelys coriacea</i>	E	Texas
Sea turtle, loggerhead	<i>Caretta caretta</i>	T	Texas
Shiner, Arkansas River Arkansas R. Basin	<i>Notropis girardi</i>	T	Texas
Snail, Pecos assiminea	<i>Assiminea pecos</i>	E	Texas
Snake, Concho water	<i>Nerodia paucimaculata</i>	T	Texas
Snowbells, Texas	<i>Styrax texanus</i>	E	Texas
Spider, Government Canyon Bat Cave	<i>Neoleptoneta microps</i>	E	Texas
Spider, Tooth Cave	<i>Leptoneta myopica</i>	E	Texas
Sunflower, Pecos (=puzzle, =paradox)	<i>Helianthus paradoxus</i>	T	Texas
Tern, least interior pop.	<i>Sterna antillarum</i>	E	Texas
Toad, Houston	<i>Bufo houstonensis</i>	E	Texas
Vireo, black-capped	<i>Vireo atricapillus</i>	E	Texas

T - Threatened

E - Endangered

XN - Non-Essential

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6.6 ENDANGERED AND THREATENED SPECIES BY STATE, CONTINUED

COMMON NAME	SCIENTIFIC NAME	STATUS	STATE
Warbler (=wood), golden-cheeked	<i>Dendroica chrysoparia</i>	E	Texas
Whale, finback	<i>Balaenoptera physalus</i>	E	Texas
Whale, humpback	<i>Megaptera novaeangliae</i>	E	Texas
Wild-rice, Texas	<i>Zizania texana</i>	E	Texas
Woodpecker, red-cockaded	<i>Picoides borealis</i>	E	Texas

T - Threatened

E - Endangered

XN - Non-Essential

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6.7 TERMINAL MAP FEATURE INDEX

MAP ID#	MAP NAME	FEATURE	NAME
---------	----------	---------	------

6.8 TERMINAL SENSITIVITY MAPPING

[Click here to view Brownsville Terminal Complex Map](#)
[Click here to view Brownsville Terminal Complex Map](#)

6.10 PIPELINE SENSITIVITY MAPPING

[Click here to view Brownsville Terminal Complex Map](#)
[Click here to view Brownsville Terminal Complex Map](#)

SECTION 7

SUSTAINED RESPONSE ACTIONS

7.1 Response Resources

7.1.1 Response Equipment

Figure 7.1-1 - Regional Company and Response Contractor's Equipment List / Response Time

7.1.2 Response Equipment Inspection and Maintenance

7.1.3 Contractors, Contractor Equipment, and Labor

7.2 Incident Facilities and Communications

7.2.1 Command Post

Figure 7.2-1 - Command Post Checklist

7.2.2 Staging Area

7.2.3 Communications Plan

Figure 7.2-2 - Communications Checklist

7.3 Site Security Measures

Figure 7.3-1 - Site Security Checklist

7.4 Materials / Waste Management

Figure 7.4-1 - Materials / Waste Management Flowchart

Figure 7.4-2 - General Waste Containment and Disposal Checklist

7.4.1 Storage

Figure 7.4-3 - Temporary Storage Methods

7.5 Public Affairs

Figure 7.5-1 - Media Incident Fact Sheet

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7.1 RESPONSE RESOURCES

7.1.1 Facility Response Equipment

BOOM				
TYPE/MODEL/YEAR	QUANTITY	SIZE	CONTAINMENT AREA (sq ft)	STORAGE LOCATION
2008	200 ft.	6" float/ 12" skirt	variable	Border Terminal (4300 Series) Warehouse
SORBENTS				
TYPE/YEAR	QUANTITY	ABSORPTION CAPACITY (gal)	STORAGE LOCATION	OPERATIONAL STATUS
Misc. pads, boom, and/or granular	Unspecified	Unspecified	Office & warehouse buildings (as indicated on Figs. 1-8)	Readily accessible by facility personnel
HAND TOOLS				
TYPE/YEAR	QUANTITY	STORAGE LOCATION	OPERATIONAL STATUS	
Shovels, rakes, gloves, etc.	Typical for facility	Storage & warehouse buildings (as indicated on Figs. 1-8)	Readily accessible by facility personnel	
FIRE FIGHTING AND PERSONNEL PROTECTIVE EQUIPMENT				
TYPE/YEAR	QUANTITY	STORAGE LOCATION	OPERATIONAL STATUS	
Portable fire extinguishers, basic PPE	Unspecified	Throughout facility complex	Readily accessible by facility personnel	

***Note:** Response equipment is tested and deployed as described in **FIGURE A.1-2** and **FIGURE A.1-4**.

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7.1 RESPONSE RESOURCES

7.1.1 Response Equipment

Company and Contractor response equipment is provided in **FIGURE 7.1-1**.

FIGURE 7.1-1 - REGIONAL COMPANY AND RESPONSE CONTRACTOR'S EQUIPMENT LIST / RESPONSE TIME

* USCG Classified OSRO

COMPANY/CONTRACTOR	EQUIPMENT	RESPONSE TIME
R.M. Walsdorf Brownsville, TX	Containment boom, boats, vac trucks, response trailers, sorbent materials, personnel	0.5 hour(s)
Chemical Response & Remediation Harlingen, TX	Containment boom, boats, vac trucks, response trailers, sorbent materials, personnel	1 hour(s)
* Garner Environmental Services, Inc. Deer Park, TX	Full response capabilities (per USCG classif.)	1 hour(s)
* Oil Mop, LLC Pasadena, TX	Full response capabilities (per USCG classif.)	1 hour(s)
* U.S. Environmental Services, LLC Laredo, TX	Full response capabilities (per USCG classif.)	4 hour(s)
* SWS Environmental Services Cibolo, TX	Full response capabilities (per USCG classif.)	6 hour(s)
* TAS Environmental Services, LP San Antonio, TX	Full response capabilities (per USCG classif.)	6 hour(s)

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7.1.2 Response Equipment Inspection and Maintenance

Response equipment inspections will be performed and documented using **FIGURE A.2-4**. OSRO supplied equipment, maintenance and deployment records are maintained separately at the facility.

7.1.3 Contractors, Contractor Equipment, and Labor

- The Company's primary response contractors' names and phone numbers, as well as other companies who can provide spill response services, are provided in **SECTION 3**
- The Company has ensured by contract the availability of private personnel and equipment necessary to respond, to the maximum extent practicable, to the worst case discharge or the substantial threat of such discharge
- **APPENDIX B** contains evidence of contracts for the Company's primary response contractors

7.2 INCIDENT FACILITIES AND COMMUNICATIONS

7.2.1 Command Post

In the event of a major spill, a Unified Command Post will be established. For a minor spill, only a Command Post will be established. Refer to **FIGURE 7.2-1** for guidelines in establishing a Command Post.

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FIGURE 7.2-1 - COMMAND POST CHECKLIST

COMMAND POST CHECKLIST	INITIALS	DATE/TIME STARTED	DATE/TIME COMPLETED
Ensure adequate space for size of staff.			
Ensure 24-hour accessibility.			
Ensure personal hygiene facilities.			
Ensure suitability of existing communications resources (phone/fax/radio).			
Ensure suitability of private conference and briefing rooms.			
Identify Command Post security requirements, safe location.			
Notify other parties of Command Post location; provide maps/driving directions.			
Determine staging areas and incident base locations.			
Identify future need to move, upgrade facilities.			

7.2.2 Staging Area

In a major spill response, numerous staging areas may be required to support containment and clean-up operations.

In selecting a suitable staging area, the following criteria should be considered:

- Accessibility to impacted areas
- Proximity to secure parking, airports, docks, pier, or boat launches
- Accessibility to large trucks and trailers which may be used to transfer equipment

In addition, the staging area should:

- Be in a large open area in order to provide storage for equipment and not interfere with equipment loading and offloading operations
- Have a dock/pier on site for deploying equipment
- Have moorage available for vessels to aid the loading/offloading of personnel

7.2.3 Communications Plan

Company-owned communications equipment and quantities commonly used to address response communications are listed below:

FACILITY COMMUNICATIONS SUMMARY
Facility Communications:
<p>Primary Method(s): Portable radios (19 hand-held and 4 vehicle-mounted) will serve as the primary means of communication at this facility.</p> <p>Base stations (range 10 miles) are located in the Southwest and Brownsville terminal offices.</p> <p>All radio equipment is used and tested as a part of day-to-day operations. Equipment defects will be detected in a timely fashion and repairs/ replacements made as needed.</p> <p>Alternate Method(s): Channel 81, 157.075 MHZ, VHS-FM has been designated for use by mobile stations involved in response activities.</p> <p>Pager and answering services.</p> <p>Electronic mail (E-mail) via Company computer network.</p>
At Remote Locations Covered by Response Plan:
<p>Location: All Method(s): Mobile phone</p>
Contractor or Cooperative Additional Communication Package(s), if any.
n/a

Normal Company communications at each facility are conducted via telephone lines, cellular telephones, two way radios, e-mail, and fax machines.

Additional communications equipment (VHF portable radios with chargers and accessories, command post with UHF, VHF, single sideband, marine, aeronautical, telephone, and hard-line capability) may be provided by the Company or leased from a communications company in the area. Communications with government agencies, state police, and contractors can be conducted on portable radios. Refer to **FIGURE 7.2-2** for guidelines to setup communications.

It is the responsibility of the Qualified Individual to provide an adequate communications system.

The Communications Plan, written at the time of an incident, will identify telephone numbers and radio frequencies used by responders. This may also involve activation of multiple types of communications equipment and coordination among multiple responding agencies and contractors.

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FIGURE 7.2-2 - COMMUNICATIONS CHECKLIST

COMMUNICATIONS CHECKLIST	INITIALS	DATE/TIME STARTED	DATE/TIME COMPLETED
Develop a Communications Plan.			
Ensure adequate phone lines per staff element - contact local provider.			
Ensure adequate fax lines - contact local provider.			
Internet access necessary?			
Ensure recharging stations for cellular phones.			
VHF radio communications: <ul style="list-style-type: none"> • Establish frequencies • Assign call signs • Distribute radios • Establish communications schedule 			
Ensure recharging stations for VHF radios.			
Determine need for VHF repeaters.			
Ensure copy machine available.			
Ensure communications resource accountability.			
Ensure responders have capability to communicate with aircraft, as necessary.			

Note: Some actions on this checklist may not be applicable or may be continuous activities.

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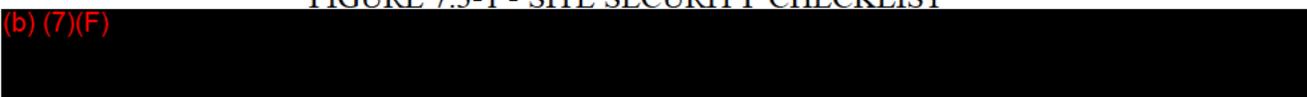
7.3 SITE SECURITY MEASURES

(b) (7)(F)

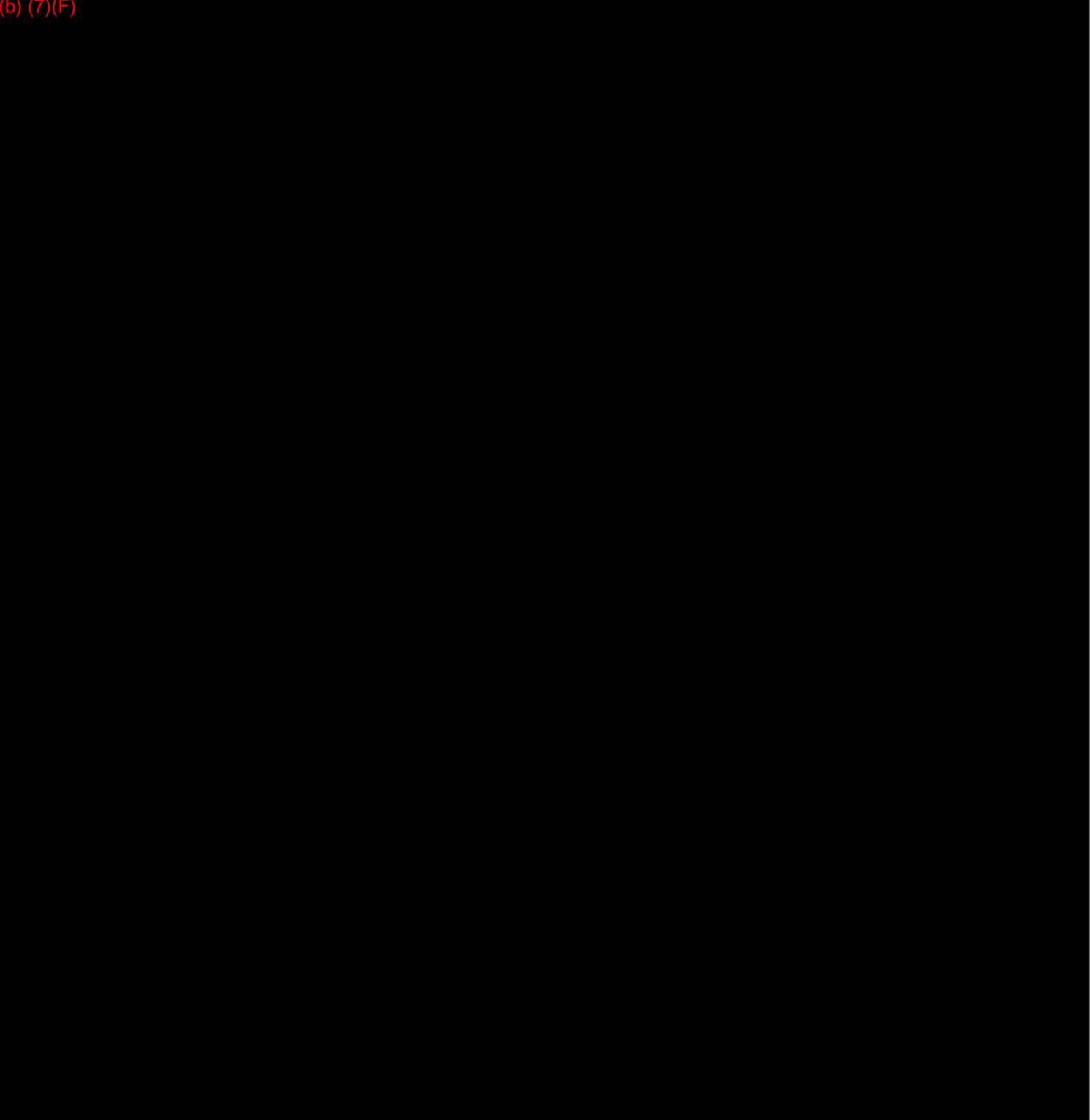


FIGURE 7.3-1 - SITE SECURITY CHECKLIST

(b) (7)(F)



(b) (7)(F)



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7.4 MATERIALS / WASTE MANAGEMENT

Initial oil-handling and disposal needs may be overlooked in the emergency phase of a response, which could result in delays and interruptions of cleanup operations. Initially, waste management concerns should address:

- Equipment capacity

- Periodic recovery of contained oil
- Adequate supply of temporary storage capacity and materials

The following action items should be conducted during a spill response:

- Development of a Site Safety and Health Plan (**SECTION 5.3**) addressing the proper PPE and waste handling procedures
- Development of a Disposal Plan (**SECTION 5.5**) in accordance with any federal, state, and/or local regulations
- Continuous tracking of oil disposition in order to better estimate amount of waste that could be generated over the short and long-term
- Organization of waste collection, segregation, storage, transportation, and proper disposal
- Minimization of risk of any additional pollution
- Regulatory review of applicable laws to ensure compliance and (if appropriate) obtain permit(s) necessary for transport and/or disposal of materials according to State, local, and Federal requirements
- Documentation of all waste-handling and disposal activities
- Disposal of all waste in a safe and approved manner (Refer to **FIGURE 3.4-1** for a listing of disposal/recycle facilities)

Good hazardous materials management includes:

- Reusing materials when possible
- Recycling or reclaiming materials
- Treating waste to reduce hazards or reducing amount of waste generated

The management of the materials generated in cleanup and recovery activities must be conducted with the overall objective of ensuring:

- Worker safety
- Waste minimization
- Cost effectiveness
- Minimization of environmental impacts

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- Proper disposal
- Minimization of present and future environmental liability

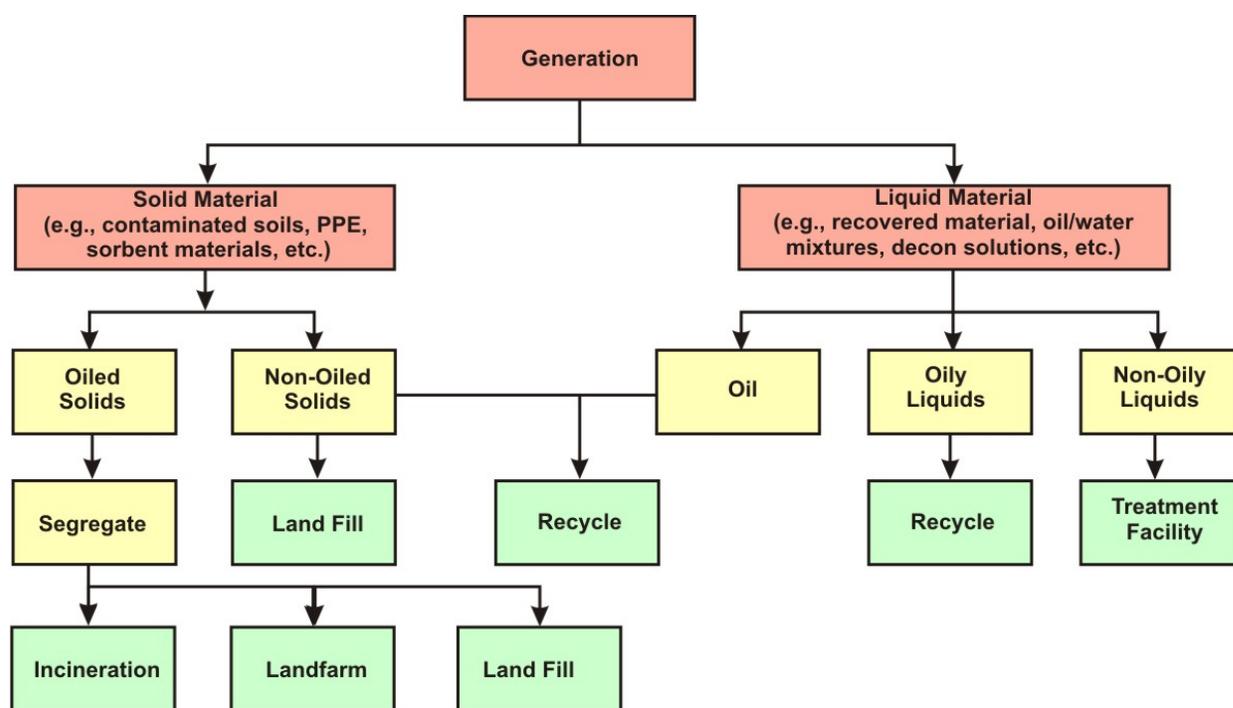
Solid wastes such as sorbents, PPE, debris, and equipment will typically be transported from the collection site to a designated facility for:

- Storage
- Waste segregation
- Packaging
- Transportation

Once this process is complete, the waste will be shipped off-site to an approved facility for required disposal.

A general flowchart for waste management is provided in **FIGURE 7.4-1**. A general checklist for containment and disposal is provided in **FIGURE 7.4-2**.

FIGURE 7.4-1 - MATERIALS / WASTE MANAGEMENT FLOWCHART



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FIGURE 7.4-2 - GENERAL WASTE CONTAINMENT AND DISPOSAL CHECKLIST

CONSIDERATION	YES/NO/NA
Is the material being recovered a waste or reusable product?	
Has all recovered waste been containerized and secured so there is no potential for further leakage while the material is being stored?	
Has each of the discrete waste streams been identified?	
Has a representative sample of each waste stream been collected?	

Has the sample been sent to an approved laboratory for the appropriate analysis, (i.e. hazardous waste determination)?	
Has the appropriate waste classification and waste code number(s) for the individual waste streams been received?	
Has a temporary EPA identification number and generator number(s) been received, if they are not already registered with EPA?	
Have the services of a registered hazardous waste transporter been contracted, if waste is hazardous?	
If the waste is nonhazardous, is the transporter registered?	
Is the waste being taken to an approved disposal site?	
Is the waste hazardous or Class I nonhazardous?	
If the waste is hazardous or Class I nonhazardous, is a manifest being used?	
Is the manifest properly completed?	
Are all federal, state, and local laws/regulations being followed?	
Are all necessary permits being obtained?	
Has a Disposal Plan been submitted for approval/review?	
Has PPE and waste-handling procedures been included in the Site Safety and Health Plan to protect the health and safety of waste handling personnel?	

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7.4.1 Storage

During an oil spill, the volume of oil that can be recovered depends on the storage capacity available. Typical short-term (temporary) storage methods are provided in FIGURE 7.4-3. If storage containers such as bags or drums are used, the container should be clearly marked and/or color-coded to indicate the type of material or waste contained and/or the final disposal option.

FIGURE 7.4-3 - TEMPORARY STORAGE METHODS

CONTAINMENT	PRODUCT						CAPACITY
	OIL	OIL/WATER	OIL/SOIL	OIL/DEBRIS (Small)	OIL/DEBRIS (Medium)	OIL/DEBRIS (Large)	
Drums			X	X			0.2-0.5 yd ³
Bags			X	X	X		1.0-2.0 yd ³
Boxes			X	X	X		1-5 yd ³
Open top rolloff*	X	X	X	X	X	X	8-40 yd ³
Roll top rolloff*	X	X	X	X	X	X	15-25 yd ³
Vacuum box	X	X					15-25 yd ³

Frac tank	X	X					500-20,000 gal
Poly tank	X	X					200-4,000 gal
Vacuum truck	X	X	X				2,000-5,000 gal
Tank trailer	X	X					2,000-4,000 gal
Barge	X	X					3,000+gal
Berm, 4 ft		X	X	X	X	X	1 yd ³
Bladders	X	X					25 gal-1,500 gal

* Company policy requires liner and cover.

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7.5 PUBLIC AFFAIRS

As an additional contingency, this section contains a set of generic guidelines for dealing with the media during an emergency. It should be noted, however, that the Company has also developed a formal, written *News Media Inquiry Policy** which must take precedence over these guidelines (in the event of any apparent conflict). The Incident Commander, along with other designated Company personnel, will play a key role in providing the initial public assessment and taking the first steps to provide the Company's public response. Information in this section includes:

- Guidelines for dealing with the media
- Media Incident Fact Sheet (**FIGURE 7.5-1**)

*The current version of this document is available on the Company's SAP Portal (Documents/Public Documents/ESOH).

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GUIDELINES FOR DEALING WITH THE MEDIA

- You as a Facility Manager are the most logical person for reporters to seek out for information
- Reporters will look elsewhere to find out what happened (or engage in speculation) if you do not answer their questions or connect them with the designated Company contact(s) who can. If you do not have certain information or are not prepared to answer a particular question, acknowledge this and then advise as to when they can expect the answers to their questions (e.g., one hour).
- It is important to be courteous to all media representatives and to provide a safe place for them to wait until a Company representative can meet (or contact) them. You may need

to provide a brief, basic initial statement.

Provide	<ul style="list-style-type: none"> • A brief, general description of what happened • Steps being taken to handle the emergency
Don't provide	<ul style="list-style-type: none"> • Names of deceased or seriously injured employees until the next of kin have been notified • Speculation about the cause of the emergency • Any statement implying personal or company negligence • Number of injured or killed, if known • Cost estimates of damage
Other considerations	<ul style="list-style-type: none"> • Safety considerations should always receive priority in determining access to company property • Anticipate likely questions • There are only six questions that can be asked about any subject: who, what, when, where, why, and how • Keep answers short and understandable • Answer only the question that is asked by the reporter • Give the most important facts first • Talk to the public's concern about the incident such as whether these were deaths, injuries, any threat to the public, or danger of explosion or fire • If you don't know the answer to a question, don't be afraid to say "I don't know"; make note of the question and tell the reporter that you will try to get the answer for him - then do it • Don't be defensive

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Other considerations, continued:	<ul style="list-style-type: none"> • There is no such thing as "Talking off the record"; assume that anything and everything you say to a reporter is going to be printed and/or used in the story • Avoid "What If?" or speculative questions; these questions should be answered with a restatement of the problem and what is being done to control it
---	---

Don't speculate about the cause of the incident

- Don't minimize the situation

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FIGURE 7.5-1 - MEDIA INCIDENT FACT SHEET

What occurred:
When (time):
Where (location):
What hazards are involved:
How is the situation being handled:
What agencies have been notified: All necessary agencies have been notified
Has outside help been requested: All necessary assistance has been requested
Is there danger to the facility:
Is there danger to the community:
What danger:
Is there a need for evacuation:
Is there an environmental hazard:
What is the environmental hazard:
What is being done to minimize the environmental threat: All appropriate actions to protect the environment are being taken

SECTION 8

DEMOBILIZATION / POST-INCIDENT REVIEW

8.1 Terminating the Response

8.2 Demobilization

Figure 8.2-1 - Demobilization Checklist

8.3 Demobilization Plan

8.4 Post-Incident Review

Figure 8.4-1 - Post-Incident Review / Critique Form

Figure 8.4-2 - Incident Debriefing Form

8.1 TERMINATING THE RESPONSE

- For major oil spills, a team of federal, state, and company personnel must certify that each area is clean before halting cleanup operations
- Demobilize equipment and personnel at the first opportunity in order to reduce cost
- Consider which resources should be demobilized first; for example, berthing expenses can be saved by demobilizing out-of-area contractors before local ones
- Equipment may need both maintenance and decontamination before being demobilized
- All facilities (staging area, Command Post, etc.) should be returned to their pre-incident condition before terminating operations
- Determine what documentation should be maintained, where, and for how long
- Response personnel may be more susceptible to suffering injuries as operations conclude and the incident approaches termination
- Some activities will continue after the cleanup ends; examples include incident debriefing, bioremediation, NRDA studies, claims, and legal actions
- Consider expressing gratitude to the community, police department, fire department, and emergency crews for their work during the response

8.2 DEMOBILIZATION

The Company can reduce costs considerably by developing a Demobilization Plan (**SECTION 5.7**). Therefore, emphasis must be placed on establishing efficient demobilization procedures. A Demobilization Checklist is provided in **FIGURE 8.2-1**.

FIGURE 8.2-1 - DEMOBILIZATION CHECKLIST

DEMOBILIZATION CHECKLIST	INITIALS	DATE/TIME STARTED	DATE/TIME COMPLETED
Assign personnel to identify surplus resources and probable release times.			
Establish demobilization priorities.			
Develop decontamination procedures.			
Initiate equipment repair and maintenance.			
Develop a Disposal Plan.			
Identify shipping needs.			

Identify personnel travel needs.			
Develop impact assessment and statements.			
Obtain concurrence of Planning and Operations Group Leaders before release of personnel or equipment.			

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8.3 DEMOBILIZATION PLAN

Incident Name:	Location:
Effective Date of Plan:	Effective Time Period of Plan:
Incident Location:	Plan Prepared By:

- Demobilization Procedures

- The Operations Section will determine which resources are ready for release from a specific site. The Planning Section will provide guidance on release priorities and demobilization recommendations. Information maintained by the Planning Section will be utilized to assist in the prioritization.
- Each incident Exclusion Zone will require a Contamination Reduction Zone. Decontaminated equipment will be returned to the appropriate Staging Area for release or re-deployment. Transports for equipment will be required if remote from the Staging Area.
- The Planning Section will document all demobilization and decontamination activities.
- Equipment designated for re-assignment will be mobilized to the appropriate Staging Area.
- The Operations Section Chief will ensure a log is maintained documenting that proper decontamination procedures are performed for each piece of equipment.
- The Operations Section Chief will ensure that redeployed personnel receive proper rest prior to returning to duty. The Planning Section Chief will monitor personnel redeployment activities to ensure number of hours worked is within acceptable guidelines.
- The Operations Section Chief must approve the Demobilization Plan prior to decontamination, release or redeployment of any resources.

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8.4 POST-INCIDENT REVIEW

Purpose of Review

A critique following a spill response (even a spill response exercise) is beneficial to evaluate the actions taken or omitted. Recommendations and modifications should be made to prepare for the possibility of another product spill. The response should be investigated shortly after the incident to assure that actions taken are fresh in peoples' minds. This review should be conducted *in addition* to the Post-Incident Report for all significant and reportable incidents.

FIGURE 8.4-1 - POST-INCIDENT REVIEW / CRITIQUE FORM

The items noted below should be examined by a team composed of people knowledgeable in spill response (e.g., consultants) and key members of the response teams. These questions are intended as guidelines only; many other questions are likely to be appropriate at each stage of a critique. An incident Debriefing Form is contained in **FIGURE 8.4-2**, and should be completed following a review of the evaluation criteria.

I. DETECTION
A. Was the spill detected promptly?
B. How was it detected?
C. By whom was it detected?
D. Could it have been detected earlier? If so, how?
E. Are any instruments or procedures available to consider which might aid in spill detection?
II. NOTIFICATION
A. Were proper procedures followed in notifying government agencies? Were notifications prompt?
B. Was management notified promptly?
C. Was management response appropriate/ adequate?

FIGURE 8.4-1 - POST-INCIDENT REVIEW / CRITIQUE FORM, CONTINUED

III. ASSESSMENT / EVALUATION
A. Was the magnitude of the problem assessed accurately at the start?
B. What means were used for this assessment?
C. Are any guidelines or aids needed to assist spill evaluation?
D. What sources of information were available on winds, water currents, weather, etc.?
E. Was the information adequate and accurate?
F. Was this information useful (and used) for spill trajectory forecasts? Were such forecasts realistic?
G. Do we have adequate information on product properties?
H. Do we need additional information on changes of product properties with time (i.e., as a result of weathering and other processes)?
IV. RESPONSE - STRATEGY
A. Is there an adequate spill response plan for the location?
B. Is it flexible enough to cope with all potential spill events?

C. Does the plan include clear/detailed information regarding local environmental sensitivities?

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FIGURE 8.4-1 - POST-INCIDENT REVIEW / CRITIQUE FORM, CONTINUED

IV. RESPONSE - STRATEGY, CONTINUED

D. Are there improvements needed? More training?

V. RESPONSE - RESOURCES USED

A. What resources were mobilized?

B. How were they mobilized?

C. Was mobilization prompt?

D. How did resource utilization change with time? Why?

E. Were resources used effectively?

1. Company resources?

2. Contractors?

3. Government agencies (Federal, State, and/ or Local)?
4. Cooperatives?
5. Consultants (e.g., NRDA experts, wildlife rescue centers, etc.)?

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Corporation 2004**FIGURE 8.4-1 - POST-INCIDENT REVIEW / CRITIQUE FORM, CONTINUED**

V. RESPONSE - RESOURCES USED, CONTINUED
6. Volunteers?
7. Other resources?
F. What changes would have been useful?
G. Was there adequate knowledge of resource availability?
H. Was there adequate knowledge of waste disposal resources and capabilities?
VI. RESPONSE - EFFECTIVE
A. Was containment effective and prompt?

B. How could it have been improved?

C. Should the location or the local cooperative have additional resources for containment?

D. Was recovery effective and prompt?

E. How could it have been improved?

F. Should the facility or the local cooperative have additional resources for recovery of spilled product?

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FIGURE 8.4-1 - POST-INCIDENT REVIEW / CRITIQUE FORM, CONTINUED

VI. RESPONSE - EFFECTIVE

G. Were contaminated materials disposed of and contaminated equipment 'deconned' promptly and safely?

H. Was there adequate in-house product separation, recovery, and disposal capacity?

I. How could it have been improved?

J. Were there adequate outside disposal resources available?

VII. COMMAND STRUCTURE

A. Who was initially in charge of spill response?

B. What sort of organization was initially set up?

C. How did this change with time? Why?

D. Was the staffing of the organization adequate?

E. What changes would have been useful?

F. Was there adequate surveillance?

G. Should there be any changes?

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Corporation 2004**FIGURE 8.4-1 - POST-INCIDENT REVIEW / CRITIQUE FORM, CONTINUED****VII. COMMAND STRUCTURE, CONTINUED**

H. Were communications adequate?

I. What improvements are needed? (hardware, procedures, etc.)

VIII. MEASUREMENTS

A. Was there adequate measurement or estimation of the volume of product spilled?

B. Was there adequate measurement or estimation of the volume of product recovered?
C. Was there adequate measurement or estimation of the volume of product disposed of?
D. Should better measurement procedures be developed for either phase of operations?
E. If so, what would be appropriate and acceptable?
IX. GOVERNMENT RELATIONS
A. What are the roles and effects of the various government agencies which were involved?
B. Was there a single focal point among the government agencies for contact?
C. Should there have been better focus of communications to the agencies?
D. Were government agencies adequately informed at all stages?

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FIGURE 8.4-1 - POST-INCIDENT REVIEW / CRITIQUE FORM, CONTINUED

IX. GOVERNMENT RELATIONS, CONTINUED

E. Were too many agencies involved?
F. Are any changes needed in procedures to manage government relations?

G. Examples of affected agencies (there may be others):

1. U.S. Coast Guard

2. U.S. Environmental Protection Agency

3. National Oceanographic Atmospheric Administration

4. U.S. Dept. of Fish and Wildlife

5. State Parks

6. Harbors and Marinas

7. States

8. Cities

9. Counties

FIGURE 8.4-1 - POST-INCIDENT REVIEW / CRITIQUE FORM, CONTINUED

IX. GOVERNMENT RELATIONS, CONTINUED
H. Was there adequate agreement with the government agencies on disposal methods?
I. Was there adequate agreement with the government agencies on criteria for cleanup?
J. How was this agreement developed?
K. Were we too agreeable with the agencies in accepting their requests for specific action items (e.g., degree of cleanup)?
X. PUBLIC RELATIONS / CLAIMS
A. How were relations with the media handled?
B. How were third party claims handled?
C. How were evacuations, if any, handled?
D. What problems were encountered?
E. Are improvements needed?
F. How could public outcry (if there was any) have been reduced? Was it serious?

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FIGURE 8.4-1 - POST-INCIDENT REVIEW / CRITIQUE FORM, CONTINUED

XI. FINANCES
A. How was procurement of equipment, materials, contractors, etc., handled?
B. What problems were encountered?
C. How were expenses, wages, contractor costs, etc., tracked?
D. What problems were encountered?
E. How was business interruption handled?
F. Are improvements needed for any of the above?
G. Was support from financial services adequate? Prompt?
H. Should there be any changes?
I. Is more planning needed?
J. Should financial procedures be developed to handle such incidents?

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FIGURE 8.4-2 - INCIDENT DEBRIEFING FORM

INCIDENT DEBRIEFING FORM		
Incident Name:	Facility:	Date:
Name:	Normal Duty:	
Incident Assignment:		
<input type="checkbox"/> Incident Commander	<input type="checkbox"/> Operations Section Chief	<input type="checkbox"/> Operations Personnel
<input type="checkbox"/> Safety Officer	<input type="checkbox"/> Logistics Section Chief	<input type="checkbox"/> Logistics Personnel
<input type="checkbox"/> Legal Officer	<input type="checkbox"/> Planning Section Chief	<input type="checkbox"/> Planning Personnel
<input type="checkbox"/> Liaison Officer	<input type="checkbox"/> Finance Section Chief	<input type="checkbox"/> Finance Personnel
<input type="checkbox"/> Information Officer	<input type="checkbox"/> Other: _____	
Assignment Location:		
<input type="checkbox"/> Command Post	<input type="checkbox"/> Base	<input type="text"/>
<input type="checkbox"/> Staging Area	<input type="checkbox"/> Camp	<input type="text"/>
<input type="checkbox"/> Helibase	<input type="checkbox"/> Other	<input type="text"/>
<input type="checkbox"/> Helispot		
Incident Job Description:		
Positive Aspects:		

Areas of Improvement:

Signature:

--

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Corporation 2004****A. TRAINING / EXERCISE****B. CONTRACTOR RESPONSE EQUIPMENT****C. HAZARD COMMUNICATION MANUAL****D. HAZARD EVALUATION AND RISK ANALYSIS****E. SPILL PREVENTION CONTROL AND COUNTERMEASURE PLAN****F. CROSS-REFERENCE / APPLICABILITY OF SUBSTANTIAL
HARM / CERTIFICATION****G. ACRONYMS AND DEFINITIONS**

APPENDIX A

TRAINING / EXERCISES

A.1 Exercise Requirements and Schedules

Figure A.1-1 - PREP Response Plan Core Components

Figure A.1-2 - Exercise Requirements

Figure A.1-3 - Exercise / Drill Documentation Form

A.2 Training Program

Figure A.2-1 - Training Requirements

Figure A.2-2 - PREP Training Program Matrix

Figure A.2-3 - Personnel Response Training Log

Figure A.2-4 - Response Equipment Inspection Log

Figure A.2-5 - EPA Required Response Equipment Testing and Deployment Drill Log

- The Company participates in the National Preparedness for Response Exercise Program (PREP)
- During each triennial cycle, all components of the Plan (**FIGURE A.1-1**) must be exercised at least once
- Each Facility Manager is responsible for the following aspects:
 - Scheduling
 - Maintaining records
 - Implementing
 - Evaluation of the facility's exercise program
 - Post-drill evaluation improvements
- FIGURE A.1-2 provides descriptions of exercise requirements, **FIGURE A.1-3** provides an Exercise/Drill Documentation Form

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FIGURE A.1-1 - PREP RESPONSE PLAN CORE COMPONENTS

CORE COMPONENTS	DESCRIPTION
1. Notifications	Test the notifications procedures identified in the Area Contingency Plan (ACP) and the Spill Response Plan.
2. Staff mobilization	Demonstrate the ability to assemble the spill response organization identified in the ACP and the Spill Response Plan.
3. Ability to operate within the response management system described in the Plan: <ul style="list-style-type: none"> • Unified Command • Response management system 	<p>Demonstrate the ability of the spill response organization to work within a unified command.</p> <p>Demonstrate the ability of the response organization to operate within the framework of the response management system identified in their respective plans.</p>
4. Discharge control	Demonstrate the ability of the spill response organization to control and stop the discharge at the source.
5. Assessment	Demonstrate the ability of the spill response organization to provide initial assessment of the discharge and provide continuing assessments of the effectiveness of the tactical operations.
6. Containment	Demonstrate the ability of the spill response organization to contain the discharge at the source or in various locations for recovery operations.
7. Recovery	Demonstrate the ability of the spill response organization to recover the discharged product.
8. Protection	Demonstrate the ability of the spill response organization to protect the environmentally and economically sensitive areas identified in the ACP and the respective industry response

	plan.
9. Disposal	Demonstrate the ability of the spill response organization to dispose of the recovered material and contaminated debris.
10. Communications	Demonstrate the ability to establish an effective communications system for the spill response organization.
11. Transportation	Demonstrate the ability to establish multi-mode transportation both for execution of the discharge and support functions.
12. Personnel support	Demonstrate the ability to provide the necessary support of all personnel associated with response.
13. Equipment maintenance and support	Demonstrate the ability to maintain and support all equipment associated with the response.
14. Procurement	Demonstrate the ability to establish and effective procurement system.
15. Documentation	Demonstrate the ability of the spill response organization to document all operational and support aspects of the response and provide detailed records of decisions and actions taken.

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FIGURE A.1-2 - EXERCISE REQUIREMENTS

EXERCISE TYPE	EXERCISE CHARACTERISTICS
Facility/QI notification	<ul style="list-style-type: none"> • Conducted quarterly • Initiates mock spill notification to QI • Safety/PSM Coordinator documents time/date of notification, name, and phone number of individual contacted • Document in accordance with form in FIGURE A.1-3
Equipment deployment	<ul style="list-style-type: none"> • Conducted semiannually if company owns equipment • Response contractors listed in the plan must participate in annual deployment exercise • Document in accordance with form in FIGURE A.1-3
IMT tabletop	<ul style="list-style-type: none"> • Conducted annually • Tests IMT's response activities/responsibilities • Documents Plan's effectiveness • Must exercise worst case discharge scenario once every three years • Must test all Plan components at least once every three years • Document in accordance with form in FIGURE A.1-3
Unannounced	<ul style="list-style-type: none"> • Company will either participate in unannounced tabletop exercise or equipment deployment exercise on an annual basis, if selected

	<p>Company may take credit for participation in government initiated unannounced drill in lieu of drill required by PREP guidelines</p> <ul style="list-style-type: none"> Plan holders who have participated in a PREP government-initiated unannounced exercise will not be required to participate in another one for at least 36 months from the date of the exercise
Area	<ul style="list-style-type: none"> An industry plan holder that participates in an Area Exercise would not be required to participate in another Area Exercise for a minimum of six years
OTHER EXERCISE CONSIDERATIONS	
Drill program evaluation procedures	<ul style="list-style-type: none"> Company conducts post-exercise meetings to discuss positive items, areas for improvement, and to develop action item checklist to be implemented later
Records of drills	<ul style="list-style-type: none"> Company will maintain exercise records for five years following completion of each exercise Records will be made available to applicable agencies upon request Company will verify appropriate records are kept for each spill response contractor listed in Plan as required by PREP guidelines (annual equipment deployment drill, triennial unannounced drill, etc.)

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FIGURE A.1-3 - EXERCISE / DRILL DOCUMENTATION FORM

LOCATION NUMBER:		LOCATION/FACILITY NAME:	
PIPELINE LOCATION:		COUNTY/PARISH:	
DATE:	ATTENDANCE:	DRILL LENGTH:	
TYPE OF EXERCISE (Check all that apply)			
<input type="checkbox"/> ACTUAL INCIDENT	<input type="checkbox"/> ANNOUNCED	<input type="checkbox"/> UNANNOUNCED	
<input type="checkbox"/> DEPLOYMENT	<input type="checkbox"/> NOTIFICATION	<input type="checkbox"/> TABLETOP	<input type="checkbox"/> FULL SCALE
FREQUENCY OF EXERCISE			
<input type="checkbox"/> QUARTER	<input type="checkbox"/> 1ST	<input type="checkbox"/> 2ND	<input type="checkbox"/> 3RD
<input type="checkbox"/> ANNUAL DRILL		<input type="checkbox"/> SEMI-ANNUAL DRILL	
PARTICIPANTS			
COMPANY/AGENCY	CONTACT PERSON	TIME	PHONE

(IF MORE AGENCIES INVOLVED ATTACH LIST)			
EXPLANATION OF SCENARIO:			
LESSONS LEARNED:			
ANY DEFICIENCIES IDENTIFIED (Page 2) <input type="checkbox"/> YES <input type="checkbox"/> NO			
IF YES, CHANGES IMPLEMENTED? <input type="checkbox"/> YES <input type="checkbox"/> NO			
IF NO, DESCRIBE HOW ACTION ITEMS ARE TRACKED FOR FOLLOW UP.			
<hr style="border: 2px solid black;"/> SIGNATURE, INCIDENT COMMANDER/PREPARER			

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FIGURE A.1-3 - EXERCISE / DRILL DOCUMENTATION FORM, CONTINUED

<u>YES</u>	<u>NO</u>	<u>NA</u>	
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Notification - Were notification procedures followed and adequate?
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Safely Respond - Was the scene approached properly?
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Isolate and Deny Entry - Were zones, corridors, and evacuation routes used properly?
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Command - Was incident command established and used properly?
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Identification of Material - Was material identified in an appropriate time and manner?
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Assessment/Action Plan - Was written action plan developed and followed?
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Protective Equipment - Was PPE identified and used properly?
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Control - Were control techniques applied appropriately?
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Protective Actions - Were protective actions applied appropriately?
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Decontamination - Waste material(s) disposed of properly?
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Disposal - Waste material(s) disposed of properly?
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Termination - Was the incident terminated at the appropriate time, and all de-briefed?

- Medical - Was medical and/or first aid available and used properly?
- Documentation - Was all documentation gathered?

SIGNATURE, INCIDENT
COMMANDER/PREPARER

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A.2 TRAINING PROGRAM

FIGURE A.2-1 provides training requirements for spill responders. **FIGURE A.2-2** provides the program matrix. **FIGURE A.2-3** provides a personnel response training log. Personnel response training records are maintained at the facility.

FIGURE A.2-1 - TRAINING REQUIREMENTS

TRAINING TYPE	TRAINING CHARACTERISTICS
Training in use of spill response plan	<ul style="list-style-type: none"> All field personnel will be trained to properly report/monitor spills Plan will be reviewed annually with all employees and contract personnel The Personnel Response Training Log is located in FIGURE A.2-3
OSHA training requirements	<ul style="list-style-type: none"> All Company responders designated in Plan must have 24 hours of initial spill response training Laborers having potential for minimal exposure must have 24 hours of initial oil spill response instruction and eight hours of actual field experience Spill responders having potential exposure to hazardous substances at levels exceeding permissible exposure limits must have 40 hours of initial training offsite and 24 hours of actual field experience On-site management/supervisors required to receive same training as equipment operators/general laborers plus eight hours of specialized hazardous waste management training Managers/employees require eight hours of annual refresher training
Spill Management Team personnel training	<ul style="list-style-type: none"> See recommended PREP Training Program Matrix (FIGURE A.2-2)
Training for casual laborers or volunteers	<ul style="list-style-type: none"> Only persons who are members of an oil spill cooperative, neighboring facility, or other group, who are known to have the minimum required response training to perform a response task, or who can document proof of having

	received such training, will be permitted to assist with response to a discharge
Wildlife	<ul style="list-style-type: none"> • Only trained personnel approved by USFWS and appropriate state agency will be used to treat oiled wildlife
Training documentation and record maintenance	<ul style="list-style-type: none"> • Training activity records will be retained five years for all personnel following completion of training • Company will retain training records indefinitely for individuals assigned specific duties in the Plan • Training records will be retained at each facility or pipeline office; Facility Manager in conjunction with ESOH will document all applicable training

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FIGURE A.2-2 - PREP TRAINING PROGRAM MATRIX

TRAINING ELEMENT	QUALIFIED INDIVIDUAL (QI)	INCIDENT MANAGEMENT TEAM (IMT)	FACILITY PERSONNEL
Captain of the Port (COTP) Zones or Environmental Protection Agency (EPA) Regions in which the facility is located	x	x	x
Notification procedures and requirements for facility owners or operators; internal response organizations; federal and state agencies; and contracted oil spill removal organizations (OSROs) and the information required for those organizations	x	x	x
Communication system used for the notifications	x	x	x
Information on the products stored, used, or transferred by the facility, including familiarity with the material safety data sheets (MSDS), special handling procedures, health and safety hazards, spill and fire fighting procedures	x	x	x
Procedures the facility personnel may use to mitigate or prevent any discharge or a substantial threat of a discharge of oil resulting from facility operational activities associated with internal or external cargo transfers, storage, or use	x		

Facility personnel responsibilities and procedures for use of facility equipment which may be available to mitigate or prevent an oil discharge	x	x	x
Operational capabilities of the contracted OSRO's to respond small, medium, and large discharges	x	x	x
Responsibilities and authority of the Qualified Individual (QI) as described in the Spill Response Plan and Company response organization	x	x	x
The organization structure that will be used to manage the response actions including: <ul style="list-style-type: none"> • Command and control • Public information • Safety • Liaison with government agencies • Spill response operations • Planning • Logistics support • Finance 	x	x	x
The responsibilities and duties of each Spill Management Team (SMT) within the organization structure	x	x	
The drill and exercise program to meet federal and state regulations as required under Oil Pollution Act of 1990 (OPA 90)	x	x	x
The role of the QI in the post discharge review of the Plan to evaluate and validate its effectiveness	x		
The Area Contingency Plan (ACP) for the area in which the facility is located	x	x	x
The National Contingency Plan (NCP)	x	x	x
Roles and responsibilities of federal and state agencies in pollution response	x	x	x

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FIGURE A.2-2 - PREP TRAINING PROGRAM MATRIX, CONTINUED

TRAINING ELEMENT	QUALIFIED INDIVIDUAL (QI)	INCIDENT MANAGEMENT TEAM (IMT)	FACILITY PERSONNEL
Available response resources identified in the Plan	x	x	
Contracting and ordering procedures to acquire OSRO resources identified in	x	x	

the Plan			
OSHA requirements for worker health and safety (29 CFR 1910.120)	x	x	x
Incident Command System/Unified Command System	x	x	
Public affairs	x	x	
Crisis management	x	x	
Procedures for obtaining approval for dispersant use or in-situ burning of the spill	x		
Oil spill trajectory analyses	x		
Sensitive biological areas	x	x	
This training procedure as described in the Plan for members of the SMT		x	
Procedures for the post discharge review of the plan to evaluate and validate its effectiveness		x	
Basic information on spill operations and oil spill clean-up technology including: <ul style="list-style-type: none"> • Oil containment • Oil recovery methods and devices • Equipment limitations and uses • Shoreline cleanup and protection • Spill trajectory analysis • Use of dispersants, in-situ burning, bioremediation • Waste storage and disposal considerations 		x	
Hazard recognition and evaluation		x	
Site safety and security procedures		x	
Personnel management, as applicable to designated job responsibilities		x	
Procedures for directing the deployment and use of spill response equipment, as applicable to designated job responsibilities		x	x
Specific procedures to shut down effected operations			x
Procedures to follow in the event of discharge, potential discharge, or emergency involving the following equipment or scenarios: <ul style="list-style-type: none"> • Tank overfill • Tank rupture • Piping or pipeline rupture • Piping or pipeline leak, both under pressure or not under pressure, if applicable • Explosion or fire 			x

<ul style="list-style-type: none"> • Equipment failure • Failure of secondary containment system 			
QI's name and how to contact him or her			x

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FIGURE A.2-3 - PERSONNEL RESPONSE TRAINING LOG

NAME	RESPONSE TRAINING/DATE AND NUMBER OF HOURS	PREVENTION TRAINING/DATE AND NUMBER OF HOURS
------	--	--

In addition to participation in the PREP Guidelines (as discussed above) and the Company's computer-based training program, all full-time facility operations personnel receive a minimum of 24 hours of HAZWOPER training, with an 8-hour annual refresher course. All training records are maintained in the Facility files, and will be retained for as long as a given individual has responsibilities designated under this response plan.

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FIGURE A.2-4 - RESPONSE EQUIPMENT INSPECTION LOG

INSPECTOR	DATE	OPERATIONAL STATUS	TYPE, MODEL, AND YEAR	NUMBER	SIZE (LENGTH)	CONTAINMENT AREA	STORAGE LOCATION	COMMENTS
-----------	------	--------------------	-----------------------	--------	---------------	------------------	------------------	----------

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FIGURE A.2-5 - EPA REQUIRED RESPONSE EQUIPMENT TESTING AND DEPLOYMENT DRILL LOG

Note: If this facility only maintains disposable response supplies (i.e, absorbent materials) and/or small hand tools, for use in initial spill mitigation efforts, then the tables above will not be completed. Refer to FIGURE 7.1-1 for a listing of response resources maintained at or by the Facility.

APPENDIX B

CONTRACTOR RESPONSE EQUIPMENT

B.1 Cooperatives and Contractors

B.1.1 OSRO Classification

Figure B.1-1 - Evidence of Contracts (USCG Classified)

B.1 COOPERATIVES AND CONTRACTORS

The Company has contracted Oil Spill Removal Organizations (OSROs) to provide personnel and equipment in the event of a spill. The classification, response capabilities and equipment are described below.

B.1.1 OSRO Classification

The OSRO classification process was developed by the U.S. Coast Guard (USCG) to provide guidelines to enable USCG and plan preparers to evaluate an OSRO's potential to respond to oil spills. Plan holders that utilize USCG classified OSRO services are not required to list response resources in their plans.

USCG CLASSIFICATION DEFINITIONS	
<ul style="list-style-type: none"> MM - Maximum Most Probable Discharge (MMPD) Classification 	Only resources located at equipment sites capable of being mobilized and enroute to the scene of a spill within 2 hours of notification are counted toward MM and W1 classifications.
<ul style="list-style-type: none"> W1 - Worst Case Discharge Tier 1 Classification 	
<ul style="list-style-type: none"> W2 - Worst Case Discharge Tier 2 Classification 	Any type resource, owned or contracted, dedicated or non-dedicated is allowed for W2 and W3 classification.
<ul style="list-style-type: none"> W3 - Worst Case Discharge Tier 3 Classification 	

The following is a listing of the USCG classified OSROs within this Zone that may respond to incidents covered by this Plan. For a detailed listing of USCG classified OSROs and other contractors, refer to **FIGURES 3.4-1** and **7.1-1**.

OSRO	APPLICABLE COPT ZONE (S)	USCG CLASSIFICATIONS								RESPONSE TIME	
		Facilities				Vessels					
		MM	W1	W2	W3	MM	W1	W2	W3		
Garner Environmental Services, Inc. Deer Park, TX	Houston-Galveston	River/Canal	✓	✓	✓	✓	✓	✓	✓	✓	1 hour(s)
		Inland	✓	✓	✓	✓	✓	✓	✓	✓	
		Open Ocean			✓				✓	✓	
		Offshore			✓	✓			✓	✓	
		Nearshore			✓	✓			✓	✓	

		Great Lakes									
Oil Mop, LLC Pasadena, TX	Houston-Galveston	Facilities				Vessels				1 hour(s)	
		MM	W1	W2	W3	MM	W1	W2	W3		
		River/Canal	✓	✓	✓	✓	✓	✓	✓	✓	
		Inland	✓	✓	✓	✓	✓	✓	✓	✓	
		Open Ocean									
		Offshore									
		Nearshore									
		Great Lakes									
U.S. Environmental Services, LLC Laredo, TX	Corpus Christi	Facilities				Vessels				4 hour(s)	
		MM	W1	W2	W3	MM	W1	W2	W3		
		River/Canal			✓	✓			✓	✓	
		Inland			✓				✓		
		Open Ocean									
		Offshore									
		Nearshore									
		Great Lakes									
SWS Environmental Services Cibolo, TX	Corpus Christi	Facilities				Vessels				6 hour(s)	
		MM	W1	W2	W3	MM	W1	W2	W3		
		River/Canal	✓	✓	✓	✓	✓	✓	✓	✓	
		Inland	✓		✓	✓	✓	✓	✓	✓	
		Open Ocean									
		Offshore									
		Nearshore									
		Great Lakes									
TAS Environmental Services, LP San Antonio, TX	Corpus Christi	Facilities				Vessels				6 hour(s)	
		MM	W1	W2	W3	MM	W1	W2	W3		
		River/Canal		✓	✓	✓	✓	✓	✓	✓	
		Inland			✓	✓	✓	✓	✓	✓	
		Open Ocean			✓				✓		
		Offshore			✓				✓		
		Nearshore			✓						
		Great Lakes									

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The following response contractors are retained by the Company, for response within this Plan area:

- R.M. Walsdorf
10155 State Highway 48
Brownsville, TX
78521
- Chemical Response & Remediation
18635 Primera Road, Unit 1
Harlingen, TX
78552

Equipment lists and evidence of contracts for the above listed contractors are maintained at the Company's Corporate Offices and are available upon request. **FIGURE 7.1-1** identifies non-USCG certified response contractor equipment lists and response times.

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FIGURE B.1-1 - EVIDENCE OF CONTRACTS AND EQUIPMENT LISTS

Contract	Equipment List
• <u>Chemical Response & Remediation, Harlingen, TX</u>	<u>Chemical Response & Remediation, Harlingen, TX</u>
• <u>Garner Environmental Services, Inc., Deer Park, TX</u>	
• <u>Oil Mop, LLC, Pasadena, TX</u>	
• <u>R.M. Walsdorf, Brownsville, TX</u>	<u>R.M. Walsdorf, Brownsville, TX</u>
• <u>SWS Environmental Services, Cibolo, TX</u>	
• <u>TAS Environmental Services, LP, San Antonio, TX</u>	
• <u>U.S. Environmental Services, LLC, Laredo, TX</u>	

APPENDIX C

HAZARD COMMUNICATION MANUAL

C.1 Purpose

C.2 Hazard Determination

C.2.1 Hazard Determination Procedure

C.2.2 Responsibilities of the Facility Manager / Hazard Communication Coordinator

C.3 Hazardous Chemical Inventory

C.4 Labels and Other Warnings

C.5 Employee Information and Training

C.5.1 Safety Video Library

C.6 Maintenance and Non-Routine Tasks

C.7 Contractor Notifications

C.1 PURPOSE

The Occupational Safety and Health Administration (OSHA) Hazard Communication Standard (29 CFR 1910.1200) directs each employer to provide a written Hazard Communication Program to explain how the employer plans to meet the criteria of the Standard. This Hazard Communication (HAZCOM) Manual details the programs, procedures and instructions that have been designed to insure that all aspects of the Standard have been met at the Facility. Any state or local Right-To-Know requirements that must be met are also detailed in this booklet.

This manual is divided into sections corresponding to the key elements of an effective Hazard Communication Program. The format for each section is the same and contains the basic requirements for that particular section.

C.2 HAZARD DETERMINATION

C.2.1 Hazard Determination Procedure

1. The Facility Manager will assure that a hazard determination is made for each material entering the workplace.
2. The Facility Manager shall maintain a file of correspondence used for contacting suppliers of local purchase materials for their MSDS sheets (whenever hazard communication information is not otherwise available).

C.2.2 Responsibilities of the Facility Manager / Hazard Communication Coordinator

1. Maintain an up-to-date file of MSDS sheets for all products.
2. Review supplier MSDS sheets periodically to determine which materials are hazardous.
3. Update and maintain the written program.
4. Develop a list of all hazardous use chemicals and update the list whenever a new hazardous material is introduced into the Facility through local purchase or by contractor.
5. Ensure that all containers are properly identified and that unidentified containers are segregated in a designated area until properly labeled.
6. Maintain a file of correspondence with contractors and suppliers of materials concerning MSDS information.

C.3 HAZARDOUS CHEMICAL INVENTORY

A list of hazardous chemicals known to be present in the workplace is available for review. The names of the chemicals identified on the list are the same as on the appropriate MSDS for that product. The list will cover the inventory for the entire Facility and will be updated as new products or materials are brought into the facility.

FACILITY NAME/LOCATION	HAZARDOUS SUBSTANCES STORED/HANDLED

Brownsville Terminal Complex	aromatic solvents
Brownsville Terminal Complex	diesel/ distillate fuels (high &/or low sulfur)
Brownsville Terminal Complex	fuel additives (detergent/ dye/ lubricity)
Brownsville Terminal Complex	gasolines (automotive & aviation)
Brownsville Terminal Complex	hexane
Brownsville Terminal Complex	lubricating oils
Brownsville Terminal Complex	methylene chloride
Brownsville Terminal Complex	naphthas
Brownsville Terminal Complex	paraffin waxes
Brownsville Terminal Complex	vegetable oils
Brownsville Terminal Complex	lignite/ lignin sulfate
Brownsville Terminal Complex	perchloroethylene
Brownsville Terminal Complex	heavy fuel oils (Nos. 4, 5, & 6)
Brownsville Terminal Complex	glycols/ glycol ethers
Brownsville Terminal Complex	biodiesel fuel
Brownsville Terminal Complex	asphalt
Brownsville Terminal Complex	clyclohexanone

C.4 LABELS AND OTHER WARNINGS

At the facility, each container (storage tank) shall be labeled. The Facility Manager/Hazard Communication Coordinator is designated to insure that labeling is done properly. Each container (storage tank) shall have at least one NFPA label, properly coded. It shall also have a tank number that can be cross-referenced to the appropriate MSDS sheet for additional hazard information. This information will include the chemical identity, appropriate hazard warnings, the name and address of the manufacturer, importer, or other responsible party. Complete tankage/product listings are located in **APPENDIX D-1**.

Identification of railroad tank cars and tank trucks used for shipping and receiving materials is satisfied under DOT placarding and shipping procedures (unless used for extended periods of time).

Pipelines and piping systems should be color-coded or otherwise labeled with the product name by stenciled lettering at each end of the product line. Multiple use product lines should be labeled as such.

The Facility Manager/Hazard Communication Coordinator will confirm on a monthly basis that all containers (storage tanks) in the Facility are labeled and that the information is current.

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C.5 EMPLOYEE INFORMATION AND TRAINING

Each employee who works with or is potentially exposed to hazardous chemicals will receive initial training on the Hazard Communication Standard (HCS) and the safe handling of those

hazardous chemicals.? Additional training must be provided for employees whenever a new hazard is introduced into their workplace.?Hazardous chemical training is conducted by the Facility Manager, Safety Coordinator, or other persons designated by the company.

The training will focus on the following key elements:

- A summary of the Standard and this written program, including information on how to read and interpret information on labels and MSDS sheets and how employees can obtain and use the available hazard information.
- Hazardous chemical properties, including appearance, odor, and release detection methods.
- The potential physical/health hazards associated with the chemicals present in the workplace.
- Specific procedures to protect against hazards such as personal protective equipment, work practices, and emergency procedures.

Videotaped safety programs are available for use in the implementation of this training and should be viewed by each employee. Computer-based training modules are also available on a variety of topics related to hazard communication.

The Facility Manager (in conjunction with the ESOH Department) will monitor each employee and maintain records regarding his/her training.

C.5.1 Safety Video Library

The Company maintains an extensive library of video recordings for instructional/training usage. This collection includes over 150 titles on a wide variety of topics including, but not limited to, HazMat/RTK standards, HAZWOPER standards, chemical hazards, flammable liquids, emergency planning and response, oil spill response, confined space procedures, fire safety and fighting, and general safety. This library is updated periodically as needed or as better products become available.

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C.6 MAINTENANCE AND NON-ROUTINE TASKS

Because each location has unique and specific hazard communication requirements, the Facility Manager must develop procedures to assure that employees performing maintenance and other intermittent jobs are apprised of hazardous chemicals that may be encountered and the necessary protective measures to be taken.? This will be accomplished by an informal meeting of all persons involved before such work is done.

Remember:.?The key to this and any effective program is **communication** between all parties involved.

Examples of non-routine tasks include:

- Stripping paint with chemicals
- Confined space entry (tanks)
- Sandblasting
- Welding/Hotwork
- Asbestos removal
- Pump seal replacement

- Loading arm O-ring replacement
- Addition of glycol to flare units and vapor recovery units

C.7 CONTRACTOR NOTIFICATIONS

Contractors and other third party personnel who may come in contact with hazardous materials during the course of their work on Facility property must be advised of hazards and required precautions. Each Facility will ensure that this responsibility is fully met and that adequate documentation is maintained. In addition, the contractor will be required to notify the Facility Hazard Communication Coordinator of all hazardous materials brought on site to assure compliance with the Hazard Communication Standard and applicable local regulations and for the protection of Facility employees.

These considerations should be covered as part of the contractors' general safety orientation. Prior to beginning work, the Facility site contact should provide a copy of the Facility's written Hazard Communication Program to the contractor and review its contents. In addition, the Company Contractor Entry Permit Policy must be strictly enforced. Contractor performance should also be monitored during routine safety reviews and audits.

APPENDIX D

HAZARD EVALUATION AND RISK ANALYSIS

D.1 Facility Hazard Evaluation

D.1.1 Spill Detection

D.1.2 Hazard Evaluation

D.1.3 Vulnerability Analysis

D.1.4 Analysis of the Potential for a Spill

Figure D-1 - Storage Tank Information

D.2 Planning Distance Calculations

D.3 Discharge Scenarios

D.3.1 Small and Medium Discharge Scenarios

D.3.2 Worst Case Discharge (WCD) Scenario

D.3.3 Description of Factors Affecting Response Efforts

D.4 Planning Volume Calculations

Figure D-2 - Worksheet for Calculating Worst Case Discharge

D.4.1 USCG Portion of Facility

D.4.2 EPA Portion of Facility

Figure D-3 - Worst Case Discharge (WCD) Calculations (in bbls)

Figure D-4 - EPA Planning Volume Data

Figure D-5 - Horizontal Range of Spill

D.5 Facility Reportable Oil Spill History

Figure D-6 - Reportable Oil Spill History Record

APPENDIX D

HAZARD EVALUATION AND RISK ANALYSIS, CONTINUED

D.6 Spill Volume Calculations / Pipeline

D.7 Pipeline - Abnormal Conditions

D.8 Product Characteristics and Hazards

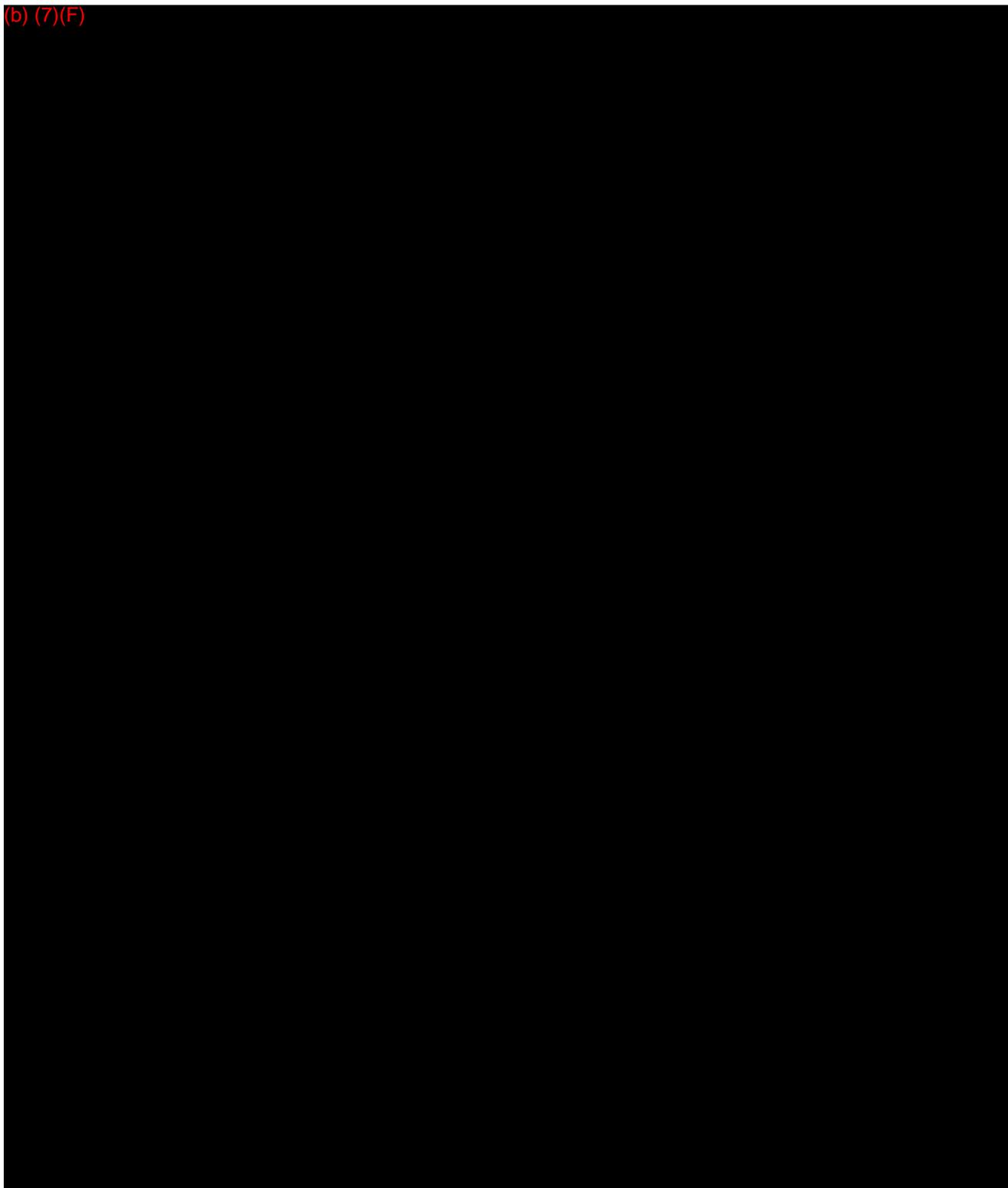
Figure D-7 - Summary of Commodity Characteristics

D.1 FACILITY HAZARD EVALUATION

D.1.1 Spill Detection

Detection

(b) (7)(F)



- **Training**

All operators (including SCADA control center and field personnel) are compliant with DOT 195 Operator Qualification Requirements.

Visual Detection by Company Personnel

Aerial surveillance is conducted via patrol flights, which are made at least 26 times per year, not to exceed 21 days between flights. In the event that aerial surveillance is not feasible, pipeline personnel will drive and/or walk the right-of-way. The intent of these patrols is to observe the ground directly over (and in the immediate vicinity of) the pipeline route for any evidence of leaks, exposed piping, wash-outs, missing markers, or any other unusual conditions. Any construction activity in the immediate vicinity of the pipeline right-of-way is also monitored carefully.

Discharges to the land or surface waters may also be detected by Company personnel during regular operations and inspections. Should evidence of a leak be detected, appropriate actions are taken including, but not limited to the following:

- Notifications (as detailed in **SECTION 3**).
- Preliminary assessment of the incident.
- If appropriate, Initial Response Actions (as detailed in **SECTION 2**).

FIGURE 2-3 provides a checklist for Initial Response Actions.

Visual Detection by the Public

Right-of-way marker signs are installed and maintained at all road crossings and other

noticeable points, providing a 24-hour Control Center number for reporting of emergency situations. The Company has also incorporated the provisions of API-1162 (Pipeline Operator Public Awareness program). In addition, the Company participates in the "Call Before You Dig" or "One Call" utility notification services, which can be used to report a leak and determine the owner/operator of a pipeline system. If the notification is received by a field office or pump station, the Company representative taking the call will generally implement the following procedures:

- Notify the Pipeline System Manager and/or the Director of Pipeline Operations.
- Notify the SCADA control center in Atlanta.
- Dispatch Company field personnel to the site to confirm discharge and conduct preliminary assessment.

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Visual Detection by the Public, Continued

- Provide assessment results to the Pipeline System Manager and/or Director of Pipeline Operations.

Pipeline Shutdown

If any of these situations involve parameters which are outside of expected values, "abnormal conditions" are considered to exist. If abnormal conditions exist, pipeline system operators will take appropriate actions to ensure that a release does not occur. If a discharge has occurred, operators will take appropriate actions to limit the magnitude. In either case, actions taken by Company personnel could include, but not be limited to the following:

- Shut down the affected line segment.
- Isolate the affected line segment.
- Depressurize the pipeline.
- Initiate internal and external notifications.
- Mobilize additional personnel and response resources, as required.

D.1.2 Hazard Evaluation

A list of potential spill sources at each Facility is identified in **FIGURE D-1**. This figure describes type and dimensions of secondary containment areas along with tank manufacturer dates. All liquid storage tanks are visually inspected on a weekly basis.

D.1.3 Vulnerability Analysis

A vulnerability analysis was performed to address the potential effects of an oil spill within the planning distance of these Facilities. The following features were considered:

- Water Intakes
- Schools

- Medical Facilities
- Residential Areas
- Businesses
- Wetlands or other Sensitive Environments
- Fish and Wildlife

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- Lakes and Streams
- Endangered Flora and Fauna
- Recreational Areas
- Transportation Routes (air, land, water)
- Utilities
- Other Applicable Areas

Identified vulnerabilities are listed in **SECTION 6**.

D.1.4 Analysis of the Potential for a Spill

The probability of a spill occurring at this facility is minimal, due to the following factors:

- Tanks are constructed in accordance with applicable engineering standards.
- Tank age is reviewed as a potential factor (refer to **FIGURE D-1**).
- Spill history is reviewed as a potential factor (refer to **FIGURE D-6**).
- Truck loading areas are constructed with concrete pads and spill collection drainage systems (that route spills to contingency tanks).
- All trucks are monitored constantly during loading/unloading procedures.
- Tank transfers are also monitored, and only conducted when the facility is attended.
- Facility equipment is inspected routinely for evidence of corrosion and/or leaks, per applicable API standards.
- Facility personnel undergo regular training in procedures to prevent pollution.
- The horizontal range of a spill is dependent upon area topography and distance to the nearest water body (refer to **FIGURE D-5** for further detail).
- Natural disasters are not likely at this facility. It may be, however, subject to periodic flooding, heavy snow/ice conditions, tornadoes, and/or lightning strikes.
- Facility personnel prepare for such conditions (noted above) by carefully monitoring weather reports and warnings, and taking appropriate safety precautions.
- The potential for a natural disaster/severe weather is acknowledged, as appropriate, during drills and exercises.

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FIGURE D-1 - STORAGE TANK INFORMATION

Container/ Source	Major Type of Failure	Total Capacity (bbl)	Secondary Containment Volume/Type (bbl)	Tank Type	Year Constructed/ Installed	Quantity Stored (bbl)	Direction of Flow/Rate	Product Stored
ABOVEGROUND CONTAINERS (TANKS)								

1001	Leak/Rupture	(b) (7)(F)	V/C/Fx/W	1979	(b) (7)(F)	East/ nstantaneous	Out of Service
1002	Leak/Rupture	(b) (7)(F)	V/C/Fx/W	1979	(b) (7)(F)	North/ nstantaneous	Out of Service
1003	Leak/Rupture	(b) (7)(F)	V/Ef/W	1979	(b) (7)(F)	East/ nstantaneous	Gasolines
1004	Leak/Rupture	(b) (7)(F)	V/Ef/W	1979	(b) (7)(F)	East/ nstantaneous	Naptha
1005	Leak/Rupture	(b) (7)(F)	V/C/F/W	1979	(b) (7)(F)	North/ nstantaneous	Diesel / Distillate fuels
1006	Leak/Rupture	(b) (7)(F)	V/C/F/W	1979	(b) (7)(F)	North/ nstantaneous	Diesel / Distillate fuels
1007	Leak/Rupture	(b) (7)(F)	V/C/F/W	1979	(b) (7)(F)	North/ nstantaneous	Diesel / Distillate fuels
1008	Leak/Rupture	(b) (7)(F)	V/C/F/W	1979	(b) (7)(F)	North/ nstantaneous	Diesel / Distillate fuels
1009	Leak/Rupture	(b) (7)(F)	V/C/F/W	1979	(b) (7)(F)	North/ nstantaneous	Diesel / Distillate fuels
1010	Leak/Rupture	(b) (7)(F)	V/C/F/W	1979	(b) (7)(F)	North/ nstantaneous	Diesel / Distillate fuels
1011	Leak/Rupture	(b) (7)(F)	V/C/F/W	1979	(b) (7)(F)	North/ nstantaneous	Diesel / Distillate fuels
1012	Leak/Rupture	(b) (7)(F)	V/C/F/W	1979	(b) (7)(F)	North/ nstantaneous	Aviation Gasolines
1013	Leak/Rupture	(b) (7)(F)	V/C/Fx/W	1987	(b) (7)(F)	North/ nstantaneous	Diesel / Distillate fuels
1014	Leak/Rupture	(b) (7)(F)	V/C/Fx/W	1987	(b) (7)(F)	North/ nstantaneous	Diesel / Distillate fuels
1015	Leak/Rupture	(b) (7)(F)	V/C/Fx/W	1987	(b) (7)(F)	North/ nstantaneous	Diesel / Distillate fuels
1016	Leak/Rupture	(b) (7)(F)	V/C/Fx/W	1975	(b) (7)(F)	East/ nstantaneous	Transmix

Note: There are no underground storage tanks or surface impoundments located at this Facility.

* Not in Containment Area ** Curbing and containment system

Containment Type:? 1-Earthern Berm and Floor,? 2-Concrete Berm and Floor, 3-Concrete Berm / Earthern Floor,?

4-Metal Berm and Floor, 5-Portable Containment or Inside Building, 6-Double Walled, 7-Synthetic Liner/Coating, 8-"Closed-Loop" Drainage System / Collection Tank, 9-Drainage System / Lined Retention Pond

Tank / Roof Type: C = Cone, D = Dome, H = Horizontal,Dw = Double walled, L = Lifter, S = Spheroid, V =

Vertical,

G = Geodesic, Fx = Fixed, F = Floating, W = Welded, R = Riveted, Ef = External Floating Roof

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FIGURE D-1 - STORAGE TANK INFORMATION

Container/ Source	Major Type of Failure	Total Capacity (bbl)	Secondary Containment Volume/Type (bbl)	Tank Type	Year Constructed/ Installed	Quantity Stored (bbl)	Direction of Flow/Rate	Product Stored
ABOVEGROUND CONTAINERS (TANKS)								
1017	Leak/Rupture	(b) (7)(F)		V/C/Fx/W	1979	(b) (7)(F)	East/ nstantaneous	Petrol. Contact Water
1019	Leak/Rupture			V/C/F/W	2009		West/ nstantaneous	Gasolines
2100	Leak/Rupture			V/D/Fx/W	1974		North/ nstantaneous	Empty
2103	Leak/Rupture			V/C/Fx/W	1948		North/ nstantaneous	Vegetable Oils
2104	Leak/Rupture			V/C/Fx/W	1948		North/ nstantaneous	Vegetable Oils
2105	Leak/Rupture			V/C/Fx/W	1948		North/ nstantaneous	Vegetable Oils
2106	Leak/Rupture			V/C/Fx/W	1948		North/ nstantaneous	Vegetable Oils
2107	Leak/Rupture			V/C/Fx/W	1948		N/A	Empty
2108	Leak/Rupture			V/C/Fx/W	1948		N/A	Empty
2117	Leak/Rupture			V/C/Fx/W	1988		North/ nstantaneous	Fuel Oils (Nos. 4, 5, &/or 6)
2118	Leak/Rupture			V/C/Fx/W	1988		North/ nstantaneous	Fuel Oils (Nos. 4, 5, &/or 6)
2119	Leak/Rupture			V/C/Fx/W	1988		North/ nstantaneous	Fuel Oils (Nos. 4, 5, &/or 6)
2120	Leak/Rupture			V/C/Fx/W	1988		North/ nstantaneous	Fuel Oils (Nos. 4, 5, &/or 6)
2121	Leak/Rupture			V/C/Fx/W	1948		N/A	Fuel Oils (Nos. 4, 5, &/or 6)
2122	Leak/Rupture			V/C/Fx/W	1962		N/A	#6 Fuel Oil

2123	Leak/Rupture	(b) (7)(F)	V/C/Fx/W	1988	(b) (7)(F)	North/ Instantaneous	Fuel Oils (Nos. 4, 5, &/or 6)
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Note: There are no underground storage tanks or surface impoundments located at this Facility.

* Not in Containment Area ** Curbing and containment system

Containment Type:? 1-Earthen Berm and Floor,? 2-Concrete Berm and Floor, 3-Concrete Berm / Earthen Floor,?

4-Metal Berm and Floor, 5-Portable Containment or Inside Building, 6-Double Walled, 7-Synthetic Liner/Coating, 8-"Closed-Loop" Drainage System / Collection Tank, 9-Drainage System / Lined Retention Pond

Tank / Roof Type: C = Cone, D = Dome, H = Horizontal,Dw = Double walled, L = Lifter, S = Spheroid, V = Vertical,

G = Geodesic, Fx = Fixed, F = Floating, W = Welded, R = Riveted, Ef = External Floating Roof

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FIGURE D-1 - STORAGE TANK INFORMATION

Container/ Source	Major Type of Failure	Total Capacity (bbl)	Secondary Containment Volume/Type (bbl)	Tank Type	Year Constructed/ Installed	Quantity Stored (bbl)	Direction of Flow/Rate	Product Stored
ABOVEGROUND CONTAINERS (TANKS)								
2124	Leak/Rupture	(b) (7)(F)		V/C/Fx/W	1988	(b) (7)(F)	North/ Instantaneous	Fuel Oils (Nos. 4, 5, &/or 6)
2125	Leak/Rupture			V/C/Fx/W	1988		North/ Instantaneous	Fuel Oils (Nos. 4, 5, &/or 6)
2126	Leak/Rupture			V/C/Fx/W	1972		North/ Instantaneous	Glycols / Glycol Ethers
2127	Leak/Rupture			V/C/Fx/W	1948		North/ Instantaneous	Fuel Oils (Nos. 4, 5, &/or 6)
2128	Leak/Rupture			V/C/Fx/W	1948		North/ Instantaneous	Empty
2129	Leak/Rupture			V/C/Fx/W	1980		North/ Instantaneous	Fuel Oils (Nos. 4, 5, &/or 6)
2130	Leak/Rupture			V/C/Fx/W	1980		North/ Instantaneous	Fuel Oils (Nos. 4, 5, &/or 6)
2131	Leak/Rupture			V/C/Fx/W	1980		North/ Instantaneous	Fuel Oils (Nos. 4, 5, &/or 6)
2132	Leak/Rupture			V/C/Fx/W	1980		North/ Instantaneous	Empty
2140	Leak/Rupture			V/C/Fx/W	1948		N/A	Empty

2141	Leak/Rupture	(b) (7)(F)	V/C/Fx/W	1948	(b) (7)(F)	North/ Instantaneous	Empty
2142	Leak/Rupture	(b) (7)(F)	V/C/Fx/W	1948	(b) (7)(F)	N/A	Empty
2143	Leak/Rupture	(b) (7)(F)	V/C/Fx/W	1948	(b) (7)(F)	North/ Instantaneous	Empty
2144	Leak/Rupture	(b) (7)(F)	V/C/Fx/W	1948	(b) (7)(F)	N/A	Empty
2145	Leak/Rupture	(b) (7)(F)	V/C/Fx/W	1948	(b) (7)(F)	North/ Instantaneous	Empty
2146	Leak/Rupture	(b) (7)(F)	V/C/Fx/W	1948	(b) (7)(F)	North/ Instantaneous	Lubricating Oils

Note: There are no underground storage tanks or surface impoundments located at this Facility.

* Not in Containment Area ** Curbing and containment system

Containment Type:? 1-Earthern Berm and Floor,? 2-Concrete Berm and Floor, 3-Concrete Berm / Earthern Floor,?

4-Metal Berm and Floor, 5-Portable Containment or Inside Building, 6-Double Walled, 7-Synthetic Liner/Coating, 8-"Closed-Loop" Drainage System / Collection Tank, 9-Drainage System / Lined Retention Pond

Tank / Roof Type: C = Cone, D = Dome, H = Horizontal,Dw = Double walled, L = Lifter, S = Spheroid, V = Vertical,

G = Geodesic, Fx = Fixed, F = Floating, W = Welded, R = Riveted, Ef = External Floating Roof

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FIGURE D-1 - STORAGE TANK INFORMATION

Container/ Source	Major Type of Failure	Total Capacity (bbl)	Secondary Containment Volume/Type (bbl)	Tank Type	Year Constructed/ Installed	Quantity Stored (bbl)	Direction of Flow/Rate	Product Stored
ABOVEGROUND CONTAINERS (TANKS)								
2148	Leak/Rupture	(b) (7)(F)	(b) (7)(F)	V/C/Fx/W	1948	(b) (7)(F)	North/ Instantaneous	Lubricating Oils
2150	Leak/Rupture	(b) (7)(F)	(b) (7)(F)	V/C/Fx/W	1948	(b) (7)(F)	N/A	Empty
2151	Leak/Rupture	(b) (7)(F)	(b) (7)(F)	V/C/Fx/W	1948	(b) (7)(F)	North/ Instantaneous	Empty
2152	Leak/Rupture	(b) (7)(F)	(b) (7)(F)	V/C/Fx/W	1948	(b) (7)(F)	North/ Instantaneous	Lubricating Oils
2153	Leak/Rupture	(b) (7)(F)	(b) (7)(F)	V/C/Fx/W	1948	(b) (7)(F)	North/ Instantaneous	Lubricating Oils
2154	Leak/Rupture	(b) (7)(F)	(b) (7)(F)	V/C/Fx/W	1948	(b) (7)(F)	North/ Instantaneous	Lubricating Oils
2155	Leak/Rupture	(b) (7)(F)	(b) (7)(F)	V/C/Fx/W	1948	(b) (7)(F)	North/ Instantaneous	Lubricating Oils
2156	Leak/Rupture	(b) (7)(F)	(b) (7)(F)	V/C/Fx/W	1948	(b) (7)(F)	North/ Instantaneous	Lubricating Oils

2157	Leak/Rupture	(b) (7)(F)	V/C/Fx/W	1948	(b) (7)(F)	North/ Instantaneous	Lubricating Oils
2158	Leak/Rupture	(b) (7)(F)	V/C/Fx/W	1948	(b) (7)(F)	North/ Instantaneous	Lubricating Oils
3200	Leak/Rupture	(b) (7)(F)	V/C/Fx/W	1960	(b) (7)(F)	North/ Instantaneous	Asphalt
3201	Leak/Rupture	(b) (7)(F)	V/C/Fx/W	1960	(b) (7)(F)	North/ Instantaneous	Asphalt
3202	Leak/Rupture	(b) (7)(F)	V/C/Fx/W	1960	(b) (7)(F)	North/ Instantaneous	Asphalt
3203	Leak/Rupture	(b) (7)(F)	V/C/Fx/W	1972	(b) (7)(F)	North/ Instantaneous	Gasolines
3204	Leak/Rupture	(b) (7)(F)	V/C/F/W	1972	(b) (7)(F)	N/A	Gasolines
3205	Leak/Rupture	(b) (7)(F)	V/C/F/W	1972	(b) (7)(F)	North/ Instantaneous	Gasolines

Note: There are no underground storage tanks or surface impoundments located at this Facility.

* Not in Containment Area ** Curbing and containment system

Containment Type:? 1-Earthern Berm and Floor,? 2-Concrete Berm and Floor, 3-Concrete Berm / Earthern Floor,?

4-Metal Berm and Floor, 5-Portable Containment or Inside Building, 6-Double Walled, 7-Synthetic Liner/Coating, 8-"Closed-Loop" Drainage System / Collection Tank, 9-Drainage System / Lined Retention Pond

Tank / Roof Type: C = Cone, D = Dome, H = Horizontal,Dw = Double walled, L = Lifter, S = Spheroid, V = Vertical,

G = Geodesic, Fx = Fixed, F = Floating, W = Welded, R = Riveted, Ef = External Floating Roof

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FIGURE D-1 - STORAGE TANK INFORMATION

Container/ Source	Major Type of Failure	Total Capacity (bbl)	Secondary Containment Volume/Type (bbl)	Tank Type	Year Constructed/ Installed	Quantity Stored (bbl)	Direction of Flow/Rate	Product Stored
ABOVEGROUND CONTAINERS (TANKS)								
3206	Leak/Rupture	(b) (7)(F)	(b) (7)(F)	V/C/F/W	2004	(b) (7)(F)	North/ Instantaneous	Transmix
4203	Leak/Rupture	(b) (7)(F)	(b) (7)(F)	H/Fx/W	1945	(b) (7)(F)	North/ Instantaneous	Cyclohexanone
4204	Leak/Rupture	(b) (7)(F)	(b) (7)(F)	H/Fx/W	1945	(b) (7)(F)	North/ Instantaneous	Cyclohexanone
4303	Leak/Rupture	(b) (7)(F)	(b) (7)(F)	H/Fx/W	1945	(b) (7)(F)	North/ Instantaneous	Glycols / Glycol Ethers
4304	Leak/Rupture	(b) (7)(F)	(b) (7)(F)	H/Fx/W	1945	(b) (7)(F)	North/ Instantaneous	Glycols / Glycol Ethers
4305	Leak/Rupture	(b) (7)(F)	(b) (7)(F)	H/Fx/W	1945	(b) (7)(F)	N/A	Empty
4311	Leak/Rupture	(b) (7)(F)	(b) (7)(F)	V/C/Fx/W	1949	(b) (7)(F)	N/A	Vegetable Oils

		(b) (7)(F)			(b) (7)(F)		
4312	Leak/Ruptur		V/C/Fx/W	1949		N/A	Vegetable Oils
4313	Leak/Ruptur		V/C/Fx/W	unknown		N/A	Empty
4314	Leak/Ruptur		V/C/F/W	1949		N/A	Empty
4315	Leak/Ruptur		V/C/Fx/W	1949		North/ Instantaneous	Empty
5001	Leak/Ruptur		V/Ef/G/W	1954		East/ Instantaneous	Gasolines
5002	Leak/Ruptur		V/Ef/G/W	1954		West/ Instantaneous	Ethanol (denatured)
5003	Leak/Ruptur		V/C/Fx/W	1935		North/ Instantaneous	Gasolines
5004	Leak/Ruptur		V/C/Fx/W	1935		North/ Instantaneous	Diesel / Distillate fuels
5005	Leak/Ruptur		V/C/F/W	1963		North/ Instantaneous	Transmix

Note: There are no underground storage tanks or surface impoundments located at this Facility.

* Not in Containment Area ** Curbing and containment system

Containment Type:? 1-Earthen Berm and Floor,? 2-Concrete Berm and Floor, 3-Concrete Berm / Earthen Floor,? 4-Metal Berm and Floor, 5-Portable Containment or Inside Building, 6-Double Walled, 7-Synthetic Liner/Coating, 8-"Closed-Loop" Drainage System / Collection Tank, 9-Drainage System / Lined Retention Pond

Tank / Roof Type: C = Cone, D = Dome, H = Horizontal,Dw = Double walled, L = Lifter, S = Spheroid, V = Vertical,

G = Geodesic, Fx = Fixed, F = Floating, W = Welded, R = Riveted, Ef = External Floating Roof

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FIGURE D-1 - STORAGE TANK INFORMATION

Container/ Source	Major Type of Failure	Total Capacity (bbl)	Secondary Containment Volume/Type (bbl)	Tank Type	Year Constructed/ Installed	Quantity Stored (bbl)	Direction of Flow/Rate	Product Stored
ABOVEGROUND CONTAINERS (TANKS)								
5096	Leak/Rupture	(b) (7)(F)		H/Fx/W	2010	(b) (7)(F)	North-NE/ Instantaneous	Fuel Additives
5097	Leak/Rupture			H/Fx/W	2010		North-NE/ Instantaneous	Fuel Additives
5098	Leak/Rupture			H/Fx/W	2010		North-NE/ Instantaneous	Fuel Additives
5099	Leak/Rupture			H/Fx/W	2010		North-NE/ Instantaneous	Off-Spec. Product
6500	Leak/Rupture			V/C/Fx/W	1974		North/ Instantaneous	Waxes

6501	Leak/Rupture	(b) (7)(F)	V/C/Fx/W	1982	(b) (7)(F)	North/ Instantaneous	Waxes
6502	Leak/Rupture	(b) (7)(F)	V/C/Fx/W	1974	(b) (7)(F)	East/ Instantaneous	Waxes
6503	Leak/Rupture	(b) (7)(F)	H/Fx/W	unknown	(b) (7)(F)	N / A	Empty
6504	Leak/Rupture	(b) (7)(F)	H/Fx/W	unknown	(b) (7)(F)	N / A	Empty
6505	Leak/Rupture	(b) (7)(F)	H/Fx/W	1945	(b) (7)(F)	N/A	Empty
6506	Leak/Rupture	(b) (7)(F)	H/Fx/W	1945	(b) (7)(F)	N / A	Empty
6507	Leak/Rupture	(b) (7)(F)	H/Fx/W	1945	(b) (7)(F)	N / A	Empty
6508	Leak/Rupture	(b) (7)(F)	H/Fx/W	1945	(b) (7)(F)	East/ Instantaneous	Glycols / Glycol Ethers
6510	Leak/Rupture	(b) (7)(F)	V/C/Fx/W	1976	(b) (7)(F)	North/ Instantaneous	Waxes
6511	Leak/Rupture	(b) (7)(F)	V/C/Fx/W	1974	(b) (7)(F)	North/ Instantaneous	Waxes
6515	Leak/Rupture	(b) (7)(F)	V/C/Fx/W	1974	(b) (7)(F)	N/A	Waxes

Note: There are no underground storage tanks or surface impoundments located at this Facility.

* Not in Containment Area ** Curbing and containment system

Containment Type:? 1-Earthern Berm and Floor,? 2-Concrete Berm and Floor, 3-Concrete Berm / Earthern Floor,?
 4-Metal Berm and Floor, 5-Portable Containment or Inside Building, 6-Double Walled, 7-Synthetic Liner/Coating, 8-"Closed-Loop" Drainage System / Collection Tank, 9-Drainage System / Lined Retention Pond
Tank / Roof Type: C = Cone, D = Dome, H = Horizontal,Dw = Double walled, L = Lifter, S = Spheroid, V = Vertical,
 G = Geodesic, Fx = Fixed, F = Floating, W = Welded, R = Riveted, Ef = External Floating Roof

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FIGURE D-1 - STORAGE TANK INFORMATION

Container/ Source	Major Type of Failure	Total Capacity (bbl)	Secondary Containment Volume/Type (bbl)	Tank Type	Year Constructed/ Installed	Quantity Stored (bbl)	Direction of Flow/Rate	Product Stored
ABOVEGROUND CONTAINERS (TANKS)								
6516	Leak/Rupture	(b) (7)(F)	(b) (7)(F)	V/C/Fx/W	1974	(b) (7)(F)	East/ Instantaneous	Waxes
6520	Leak/Rupture	(b) (7)(F)	(b) (7)(F)	V/C/Fx/W	1945	(b) (7)(F)	North/ Instantaneous	Waxes
6521	Leak/Rupture	(b) (7)(F)	(b) (7)(F)	V/C/Fx/W	1945	(b) (7)(F)	N/A	Waxes

6551	Leak/Rupture	(b) (7)(F)	V/C/Fx/W	1949	(b) (7)(F)	N/A	Out of Service
6570	Leak/Rupture	(b) (7)(F)	V/C/Fx/W	1979	(b) (7)(F)	N/A	Empty
7001	Leak/Rupture	(b) (7)(F)	V/C/Fx/W	1987	(b) (7)(F)	North/ nstantaneous	Automatic Transmission Fluid
7002	Leak/Rupture	(b) (7)(F)	V/C/Fx/W	1987	(b) (7)(F)	North/ nstantaneous	Empty
7003	Leak/Rupture	(b) (7)(F)	V/C/Fx/W	unknown	(b) (7)(F)	N / A	Out of Service
7004	Leak/Rupture	(b) (7)(F)	V/C/Fx/W	1987	(b) (7)(F)	North/ nstantaneous	Empty
7005	Leak/Rupture	(b) (7)(F)	V/C/Fx/W	unknown	(b) (7)(F)	North/ nstantaneous	Boiler Blowdown Water
7007	Leak/Rupture	(b) (7)(F)	V/C/Fx/W	unknown	(b) (7)(F)	North/ nstantaneous	Lignite

Note: There are no underground storage tanks or surface impoundments located at this Facility.

* Not in Containment Area ** Curbing and containment system

Containment Type:? 1-Earthen Berm and Floor,? 2-Concrete Berm and Floor, 3-Concrete Berm / Earthen Floor,?

4-Metal Berm and Floor, 5-Portable Containment or Inside Building, 6-Double Walled, 7-Synthetic Liner/Coating, 8-"Closed-Loop" Drainage System / Collection Tank, 9-Drainage System / Lined Retention Pond

Tank / Roof Type: C = Cone, D = Dome, H = Horizontal, Dw = Double walled, L = Lifter, S = Spheroid, V = Vertical,

G = Geodesic, Fx = Fixed, F = Floating, W = Welded, R = Riveted, Ef = External Floating Roof

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D.2 PLANNING DISTANCE CALCULATIONS

Site Investigation

The following information is utilized to calculate the planning distance for each facility.

From USGS Quad/Topographic Maps

- Delineate watershed and down-gradient receptor streams for runoff/release
- Determine whether navigable water is within 0.5 miles of the facility (or would be in worst case storm/runoff scenario)

From Facility

- Identify alternate drainage pathways to navigable waters; namely storm drainage system/piping
- Establish list of soil or other factors effecting transport of oil over land

From maps, local/state authorities or investigation

- Identify fish/wildlife sensitivities and habitats in downgradient areas along with public drinking water intake locations
- Determine stream pool elevations at facility and at receptor points or at 20 miles downstream (maximum) for more distant receptors
- Characterize stream properties for accurate determination of roughness coefficient (n) and average mid-channel depth or hydraulic radius (r)

The total planning distance equals d.

	Brownsville Terminal Complex
First receptor	Tidally-influenced waters
First receptor location (miles)	n/a
∞ (feet)	n/a
? (miles)	n/a
s (feet/mile)	n/a
Avg. mid-channel depth (feet)	n/a
r (feet)	n/a
n	n/a
v (feet/second)	n/a
t (hours)	n/a
c (seconds per mile/hours per foot)	n/a
d (total planning distance)	n/a

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If Tidally Influenced

Planning distance calculations are based on the following factors and guidelines in accordance with 40 CFR Part 112 Attachment C-III, 4.2:

- The horizontal range of a potential oil spill is influenced by the wind direction and tidal stage, however, it is expected to spread quickly. The area around each Facility is characterized by water and marsh. The marsh may contain some of the oil, and limit the spread. If the containment boom at the Facility fails, the spill could potentially impact a much larger area.
- Tidally influenced waters.
- Non persistent product.
- Resulting planning distance is 5 miles from each Facility down current during ebb tide and to the point of maximum tidal influence or 5 miles, whichever is less, during flood tide.

D.3 DISCHARGE SCENARIOS

The equipment and manpower to respond to a spill are available from several sources and are listed with the equipment and contractors in **SECTION 7** and **APPENDIX B**. The following sections are discussions of these scenarios.

D.3.1 Small and Medium Discharge Scenarios

The purpose of this section is to identify the sources and sizes of small and medium discharges as identified by OPA 90 regulations.

Potential spill scenarios may include tank overflow, valve failure, tank failure, pipe failure, hose failure or pump seal failure.

The Company would respond to these types of incidents in the same manner as a Worst Case Discharge, but at a level appropriate to the incident size; differences in response are described in the Worst Case Scenario discussion described below. In general, to the extent that a Small or Medium discharge requires resources (personnel or equipment) not available at this facility, Company personnel will notify and activate contracted OSROs (typically USCG-classified) as needed.

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D.3.2 Worst Case Discharge (WCD) Scenario

The largest tank volume at each Facility is provided in **FIGURE D-1**. The Worst Case Discharge consists of the entire contents of largest tank(s). These calculations are described in **FIGURE D-2**, actual WCD calculations are shown in **FIGURE D-3**. Discussion of this scenario is as follows:

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

1. The spill observer would notify the Person-In-Charge (PIC) in accordance with **FIGURE 2-2**.
2. The Person-In-Charge would assume the role of Incident Commander until relieved and would initiate response actions and notifications in accordance with **SECTION 2** and **SECTION 3**. If this were a small spill, the Person-In-Charge may handle all aspects of the response. The PIC may:
 - Conduct safety assessment in accordance with **FIGURE 2-3** and evacuate personnel as needed in accordance with **SECTION 2.6**.
 - Direct facility responders to shut down ignition sources.
 - Direct facility personnel to deploy containment boom.
 - Complete incident report form in accordance with **SECTION 3** and notify Qualified Individual/Incident Commander.
 - Notify regulatory agencies in accordance with **SECTION 3.3**.
3. If this were a small or medium spill, the Qualified Individual/Incident Commander may elect for the Person-In-Charge to replace the Incident Commander or to activate selected portions of the Incident Management Team (IMT). However, for a large spill, the

Qualified Individual/Incident Commander would assume the role of Incident Commander and would activate the entire Incident Management Team in accordance with activation procedures described in **SECTION 4.2**.

4. The Qualified Individual/Incident Commander would then initiate spill assessment procedures including surveillance operations, trajectory calculations and spill volume estimating in accordance with **SECTION 2.1**.
5. The Qualified Individual/Incident Commander would then utilize checklists in **SECTION 4** 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 Incident Management Team (IMT) would develop the following plans, as appropriate (some of these plans may not be required during a small or medium spill):
 - Health and Safety
 - Incident Action
 - Disposal
 - Site Security
 - Decontamination
 - Wildlife Rehabilitation
 - Alternative Response Strategies

Plan templates are included in **SECTION 5**.

7. The response would continue until an appropriate level of cleanup is obtained.

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The following table lists various facility operations and corresponding components which might be the source of a small, medium or Worst Case Discharge:

FACILITY OPERATIONS AND COMPONENTS	SMALL DISCHARGE (up to 2,100 gallons)	MEDIUM DISCHARGE (2,100 to 36,000 gallons)	WORST CASE DISCHARGE (volume largest tank)
Oil transfer operations	Hose failure	Hose failure	Not applicable
Facility maintenance operations	Leak from periodic maintenance, line not completely drained when opened	Seal failure Overfill	Not applicable
Facility piping	Flange, gasket, threaded connection	Seal failure Overfill	Not applicable
Pumps and sumps	Seal failure Overfill	Seal failure Overfill	Not applicable
Oil storage tanks	Overfill	Overfill	Catastrophic failure of largest tank
Age and condition of	Flange, gasket,	Pipeline failure	Catastrophic failure of

facility and components	threaded connector	Seal failure	largest tank
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D.3.3 Description of Factors Affecting Response Efforts

There are many factors which may affect the ability to respond to an incident. These factors are described in the following table:

FACTORS	CONSIDERATIONS AFFECTING RESPONSE EFFORTS
Size of spill	<ul style="list-style-type: none"> • Location of spill (e.g. sensitive area vs. no sensitive area) • Spread and spill movement
Proximity to downgradient water intakes	<ul style="list-style-type: none"> • Facilities are not located near water intakes or wellhead protection areas
Proximity to fish & wildlife and sensitive environments	<ul style="list-style-type: none"> • A release could impact fish, wildlife and sensitive environments as described in SECTION 6
Likelihood that discharge will travel offsite	<ul style="list-style-type: none"> • A small spill would be unlikely to travel offsite • A medium spill has the potential to travel offsite via adjacent waterways • A worst case discharge has the greatest potential to travel offsite if secondary containment is breached
Location of material spilled	<ul style="list-style-type: none"> • See facility information, SECTION 1, and drainage located in APPENDIX E
Material discharged	<ul style="list-style-type: none"> • Gasolines, Diesel Fuels, Lubricating Oils, Vegetable Oils, Naphtha, Asphalt, #6 fuel oil , Ethanol, Glycol Ethers
Weather or aquatic conditions	<ul style="list-style-type: none"> • The Facility area has the potential to receive heavy rains and occasional hurricanes
Available remediation equipment	<ul style="list-style-type: none"> • Refer to SECTION 7 and APPENDIX B • Resources are available through Oil Spill Response Contractors in quantities sufficient to meet applicable planning standards
Probability of a chain reaction or failures	<ul style="list-style-type: none"> • Potential for a chain reaction or failure is remotely possible but not anticipated. Secondary containment, response contractors and trained personnel minimize the potential of such events
Direction of spill pathway	<ul style="list-style-type: none"> • Wind direction and speed combined with currents, will determine spill trajectory for over-water facilities.? Onshore spill trajectory will be determined by local topography

D.4 PLANNING VOLUME CALCULATIONS

Once the Worst Case Discharge volume has been calculated, response resources must be identified to meet the requirements of 40 CFR 112.20(h). 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 in **FIGURE D-3**.

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FIGURE D-2 - WORKSHEET FOR CALCULATING WORST CASE DISCHARGE

D.4.1 USCG Portion of Facility

The Worst Case Discharge was formulated assuming a release from the Marine Transportation Related portion of the Facility, as directed by 33 CFR 154.1029.

The Worst Case Discharge is based on a catastrophic failure of all piping carrying oil between the marine transfer manifold(s) and the non-transportation related portion(s) of the Facility. For the Brownsville Terminal Complex, this volume is calculated as noted below. Oil spill response equipment available to respond to this spill is included in **SECTION 7** and **APPENDIX B**.

- **Worst Case Discharge (WCD)** = [(maximum time to discover + maximum time to shutdown flow) x maximum flow rate] + piping capacity = (b) (7)(F)

- **Average Most Probable Discharge**

The Average Most Probable Discharge (AMPD) is defined by 33 CFR 154 as the lesser of 50 barrels or 1% of the Worst Case Discharge. One percent of the Worst Case Discharge is approximately (b) (7)(F), therefore, the average most probable discharge is **50 barrels**.

- **Maximum Most Probable Discharge**

The Maximum Most Probable Discharge (MMPD) is defined by 33 CFR 154 as the discharge of the lesser of 1,200 barrels or 10% of the volume of the Worst Case Discharge. Ten percent of the Worst Case Discharge is approximately (b) (7)(F), therefore, the maximum most probable discharge is (b) (7)(F).

D.4.2 EPA Portion of Facility

The WCD for the EPA portion of the complex, as defined in 40 CFR 112, Appendix D, Part A, is calculated as:

- For multiple tank facilities with adequate secondary containment, the WCD is calculated as the capacity of the largest single aboveground oil storage tank within an adequate secondary containment area or the combined capacity of a group of aboveground oil storage tanks permanently manifolded together, whichever is greater

TYPE	DESCRIPTION	PRODUCT	WCD VOLUME (BBLs)
Catastrophic Tank Failure	(b) (7)(F)	Gasolines/Naphthas	(b) (7)(F)

Because the discharge for the EPA portion of the facility is greater than the USCG definition for a worst case discharge, response resources are planned for the greater of the two volumes.

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FIGURE D-3 - WORST CASE DISCHARGE (WCD) CALCULATIONS (IN BBLs)

USCG					EPA	PHMSA
Product	Group	WCD	Avg. Most Probable	Max. Most Probable		
Lube Oils (Dock #2)	4 - Persistent	(b) (7) (F)	(b) (7)(F)			
Asphalt (Dock #3)	5					
Gasolines (Dock #5)	1 - Non-persistent					
Lube Oils (L.C. Dock)	4 - Persistent					

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FIGURE D-4 - EPA PLANNING VOLUME DATA

STEP	PARAMETER	Brownsville Terminal Complex
(A)	WCD (bbls)	(b) (7)
(B)	Oil group	1 - Non-persistent
(C)	*Geographic area	Nearshore/Inland
(D1)	Percent lost to natural dissipation	80
(D2)	Percent recovered floating oil	20
(D3)	Percent oil onshore	10
(E1)	On water recovery (bbls)	(b) (7)(F)
(E2)	Shoreline recovery (bbls)	
(F)	Emulsification Factor	1.0
(G)	On water recovery resource mobilization factor	
(G1)	Tier I	0.15
(G2)	Tier II	0.25
(G3)	Tier III	0.40
Part II	On water recovery capacity (bbls/day)	
	Tier I	6,372
	Tier II	10,621
	Tier III	16,993
Part	Shoreline cleanup volume	21,242

III	(bbls/day)	
Part IV	On water response capacity by operating area (bbls/day)	
(J1)	Tier I	12,500
(J2)	Tier II	25,000
(J3)	Tier III	50,000
Part V	On water amount needed to be identified, but not contracted for in advance	
	Tier I	0
	Tier II	0
	Tier III	0

R = Rivers and canals
 N = Nearshore/Inland

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FIGURE D-5 - HORIZONTAL RANGE OF SPILL

FACTOR	DESCRIPTION
	Brownsville Terminal Complex
Distance to the nearest body of moving water	All of the terminal areas are located within 1/4 mile or less from the Brownsville Ship Channel.
Distance to the nearest storm sewer	There are multiple storm sewers located within the Port of Brownsville area, many of which are located within 1/4 mile or less of the various terminal facilities.
Distance to the nearest drainage ditch or swale	There are multiple drainage ditches located within the Port of Brownsville area, many of which are located within 1/4 mile or less of the various terminal facilities.
Geology	Area soil is largely impervious, characterized by a combination of San Benito clay and dredge spoils from the Brownsville Ship Channel (sand/clay mix)
Topography of the terminal and surrounding area	Terrain is generally flat and featureless. On the North side of the Channel, surface runoff is generally to the North, toward the Rancho Viejo Floodway. On the South side of the Channel, surface runoff is generally to the North, to the Channel.

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D.5 FACILITY REPORTABLE OIL SPILL HISTORY

Reportable oil spills at the Facility are recorded in **FIGURE D-6**. If **FIGURE D-6** is blank,

there have been no reportable oil spills.

FIGURE D-6 - REPORTABLE OIL SPILL HISTORY RECORD*

Facility Name: Brownsville Terminal Complex	Date of Release: 12/20/02
Material: hexane (suspected)	Quantity Released: unknown (sheen) gals
Release Description / Cause / Location: Apparent leak in dock pipeline from Tejano Terminal to Oil Dock #1, Brownsville Ship Channel, North Side.	
Amount Reaching Navigable Waters: unknown (sheen) gals	
Effectiveness and Capacity of Secondary Containment: N/A - leak originated from section of buried piping.	
Cleanup Actions: Area of sheen enclosed with sorbent & containment boom. Dock line evacuated. Area of leak excavated & free product/soil removed.	
Steps Taken to Reduce Possibility of Recurrence: Affected section of piping replaced. All in-service dock lines undergo pressure tests at least annually per USCG requirements. Barrier/interceptor trench installed between area of leak and bank of channel.	
Total Oil Storage Capacity of Tanks / Impoundments from which Material was Discharged: 506 (line-fill)	bbls
Enforcement Actions: None.	
Effectiveness of Monitoring Equipment: Sheen was detected visually.	
Spill Detection: Visual.	

*Duplicate Figure as necessary.

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D.6 SPILL VOLUME CALCULATIONS / PIPELINE

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:

SPILL PREVENTION MEASURES	PERCENT REDUCTION ALLOWED
Secondary containment capacity greater than 100% capacity of tank and designed according to NFPA 30	50%
Tank built, rebuilt, and repaired according to API Std 620/650/653	10%
Automatic high-level alarms/shutdowns designed according to NFPA/API RP 2350	5%
Testing/cathodic protection designed according to API Std 650/651/653	5%
Tertiary containment/drainage/treatment per NFPA 30	5%*
Maximum allowable credit or reduction	75%

Note: *The facilities 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 line sections with the highest throughput and largest drainage volume between block valves on pump stations were chosen to calculate the pipeline worst case discharge. Although the entire discharge volume of each line was used for the worst case discharge, in an actual spill event, it would take days to drain the line completely. The line would be sealed early in the response effort.

The maximum historic discharge is not applicable for WCD covered by this plan. There are no breakout tanks associated with this pipeline; therefore, breakout tank calculations for WCD are also not applicable for this plan

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The worst case discharge for the pipeline is calculated as:

$$WCD = [(DT + ST) \times MF] + DD$$

Where:

WCD = worst case discharge (bb1)

DT + ST = maximum detection time + maximum shut down time in adverse weather (generally fifteen minutes except where noted)

MF = maximum flow rate (bph) (b) (7)(F)

DD = drain down volume (bbl)

WCD = (b) (7)(F)

D.7 PIPELINE - ABNORMAL CONDITIONS

Because PHMSA considers the "substantial threat" term in 49 CFR Part 194.115(a) equivalent to the "abnormal conditions" term under 49 CFR Part 195.402(d), procedures to identify events and conditions that can pose a threat of worst case discharge, and actions to take for preventing and mitigating such events and conditions are described in the **SECTION 2**.

D.8 PRODUCT CHARACTERISTICS AND HAZARDS

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

Gasolines, Diesel Fuels, Lubricating Oils, Vegetable Oils, Naphtha, Asphalt, #6 fuel oil , Ethanol, Glycol Ethers

The key chemical and physical characteristics of each of these commodities are identified in detail via MSD Sheets (which are maintained separately at the Facility) and are summarized in FIGURE D-7 on the following page.

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FIGURE D-7 - SUMMARY OF COMMODITY CHARACTERISTICS

COMMON NAME	MSDS NAME	HEALTH HAZARD	FLASH POINT	SPECIAL HAZARD	REACTIVITY	HEALTH HAZARD WARNING STATEMENT
Gasolines	Gasolines	3	4	A ,C	0	Acute & Chronic
Diesel Fuels	Diesel Fuels	1	2	A ,C	0	Acute & Chronic
Lubricating Oils	Lubricating Oils	1	1		0	Chronic
Vegetable Oils	Vegetable Oils	0	1		0	
Naphtha	Naphtha	1	2	A	0	Acute & Chronic
Asphalt	Asphalt	1	1	T, H2S	0	Acute & Chronic
#6 fuel oil	#6 fuel oil	0	2	n/a	0	Chronic
Ethanol	Ethyl Alcohol (denatured,	0	3	A	0	Acute

	fuel grade)					
Glycol Ethers	Glycol Ethers	1	1		0	Acute & Chronic
Health Hazard	4 = Extremely Hazardous 3 = Hazardous 2 = Warning 1 = Slightly Hazardous 0 = No Unusual Hazard			Fire Hazard (Flash Point)	4 = Below 73° F, 22° C 3 = Below 100° F, 37° C 2 = Below 200° F, 93° C 1 = Above 200° F, 93° C 0 = Will not burn	
Special Hazard	A = Asphyxiant C = Contains Carcinogen W = Reacts with Water Y = Radiation Hazard COR = Corrosive OX = Oxidizer H ₂ S = Hydrogen Sulfide P = Contents under Pressure T = Hot Material			Reactivity Hazard	4 = May Detonate at Room Temperature 3 = May Detonate with Heat or Shock 2 = Violent Chemical Change with High Temperature and Pressure 1 = Not Stable if Heated 0 = Stable	

APPENDIX E

SPILL PREVENTION CONTROL AND COUNTERMEASURE PLAN

- **Site Specific SPCC Plans**

 - **Brownsville Terminal Complex Drainage Plot Plan**

- **Company SPCC Forms**

 - **Figure E-1 - SPCC Plan Review and Evaluation Log**

 - Figure E-2 - Discharge Prevention Training Log

 - Figure E-3 - Inspection Procedures

 - Figure E-4 - Facility Monthly Inspection Record

 - Figure E-5 - Annual Inspection Record

 - Figure E-6 - Secondary Containment Drainage Log

 - Figure E-7 - Management Approval Review

 - Figure E-8 - Containment and Drainage Planning

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Brownsville Terminal Complex

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FACILITY INFORMATION			
Name of Facility:	Brownsville Terminal Complex	Type of Facility:	Onshore/Non Production
Location of Facility:	Port of Brownsville, Texas	Name & Address of Owner:	TransMontaigne Operating Co. L.P. 200 Mansell Court East, Suite 600 Roswell , GA 30076
Latitude/Longitude:	25deg 57min 20sec 97deg 23min 37sec	Name & Address of Operator:	TransMontaigne Operating Co. L.P. 10150 State Highway 48 (Main Office) Brownsville , Texas 78521
Designated Personnel Accountable for Oil Spill Prevention at the Facility:			
Kevin Garcia, Carlos Arizmendi			
40 CFR, 112.7			
(d) CONTINGENCY PLANNING			
<ul style="list-style-type: none"> • Should an emergency situation require outside support, the Facility can call upon local fire, police, and/or emergency units along with Oil Spill Removal Organizations (OSRO's). • The Integrated Contingency Plan (ICP) in force at this location covers detailed methods of containment, available resources, and government agencies to be notified. 			
(e) INSPECTIONS, TESTS, AND RECORDS			
<ul style="list-style-type: none"> • Visual inspections are made in the course of daily operations, including all storage tanks, tank dikes, aboveground valves, pipelines, loading pumps, loading racks, and appurtenances. • Regular, documented inspections include the following: all valves, piping, and appurtenances, aboveground tanks, containment dikes/structures, tank farms/grounds, dock areas, high-level alams/visual gauges. • Pollution prevention equipment includes overfill protection and inventory control systems (tanks and loading racks) and containment dikes/structures. • Records also include required training documentation, spill prevention meeting logs, and tank dike drainage/inspection logs. • All applicable records are maintained in Facility files for a minimum of three (3) years. 			
(f) PERSONNEL TRAINING AND DISCHARGE PREVENTION PROCEDURES			
(1) PERSONNEL TRAINING			
<ul style="list-style-type: none"> • All oil-handling personnel are properly instructed, at least annually, so as to be proficient in the following: <ol style="list-style-type: none"> 1. General Facility operations (particularly the operation and maintenance of equipment to prevent oil discharges); 			

<ul style="list-style-type: none"> • 2. Discharge response protocols (via regular review of Facility's Integrated Contingency Plan);
<ul style="list-style-type: none"> • 3. Applicable pollution control laws, rules, and regulations;
<ul style="list-style-type: none"> • 4. The contents of this SPCC Plan and the Facility's Integrated Contingency Plan.
<ul style="list-style-type: none"> • Non-Company personnel (contractors) are required to attend an orientation meeting with company personnel prior to working at the Facility.
<ul style="list-style-type: none"> • Facility personnel also undergo formal HAZWOPER training and a wide variety of applicable Computer-Based Training.
<ul style="list-style-type: none"> • Proper operation of vehicles to prevent damage to piping is addressed when applicable.
(2) DESIGNATED PERSON
<ul style="list-style-type: none"> • Refer to Facility Information above for the <i>Designated Personnel Accountable for Oil Spill Prevention at this Facility</i>.
(3) SPILL PREVENTION BRIEFINGS
<ul style="list-style-type: none"> • Employees review spill prevention procedures and the SPCC Plan at least annually, and actual spill events are reviewed and discussed in safety meetings.
<ul style="list-style-type: none"> • As indicated above, employees are instructed in applicable pollution control laws, rules, and regulations.
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Brownsville Terminal Complex

40 CFR, 112.7
(h) SECURITY



(h) FACILITY TANK CAR AND TANK TRUCK LOADING/UNLOADING RACK
(1) RACK AREA DRAINAGE
<ul style="list-style-type: none"> • As required by 40 CFR 112.7(c), truck loading rack areas are constructed with concrete pads, & are either curbed to provide immediate containment for spills or sloped so as to

direct spills to adjacent containment features.
<ul style="list-style-type: none"> • Rail transfer areas are equipped with containment structures and/or are provided with area containment via local topography.
<ul style="list-style-type: none"> • These features are designed to contain a spill from the largest single compartment of a tank truck or tank/rail car.
<ul style="list-style-type: none"> • In addition, all tank truck & tank/rail car transfer operations are either conducted or monitored by Facility personnel, & sorbent materials are available for immediate, initial spill mitigation efforts.
(2) INTERLOCKED WARNING LIGHT OR PHYSICAL BARRIER
<ul style="list-style-type: none"> • Prominent signs posted in the loading areas warn drivers to completely disconnect loading arm(s), ground cable, and vapor hose (if applicable) prior to departure.
(3) TRUCK DRAIN / OUTLET EXAMINATION
<ul style="list-style-type: none"> • All trucks are inspected for leaks, either by Facility personnel or transport drivers (and any problems are addressed), prior to loading/unloading operations and departure.
(i) BRITTLE FRACTURE EVALUATION REQUIREMENTS
<ul style="list-style-type: none"> • If a field-erected aboveground storage tank undergoes repair, alteration, reconstruction, or change in service that might affect the risk of discharge or failure due to brittle fracture or other catastrophe, it will be evaluated for risks of such failure or catastrophe and appropriate action(s) will be taken in response.
<ul style="list-style-type: none"> • If a field-erected aboveground storage tank has discharged oil or failed due to brittle fracture or other catastrophe, it will be evaluated for risks of such failure or catastrophe and appropriate action(s) will be taken in response.

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Brownsville Terminal Complex

40 CFR, 112.8
(b) FACILITY DRAINAGE
(1) DRAINAGE FROM DIKED AREAS
<ul style="list-style-type: none"> • Drainage from diked areas is accomplished either via gravity flow through manually-operated valves or via manually-operated pump(s).
(2) DRAIN VALVES
<ul style="list-style-type: none"> • Drainage from diked areas is accomplished either via gravity flow through manually-operated valves or via manually-operated pump(s).
(3) FACILITY DRAINAGE SYSTEM FROM UNDIKED AREAS
<ul style="list-style-type: none"> • Approximately 75% of the piping in this Facility is located outside of containment structures.
<ul style="list-style-type: none"> • Most of these sections of piping are associated with the dock operations, regulated by USCG, and inspected and tested accordingly.
<ul style="list-style-type: none"> • The remainder of piping sections are located over wide, fairly level areas which are not in close proximity to waterways or conduits.
<ul style="list-style-type: none"> • Drainage from undiked areas is further illustrated on the Facility Drainage Diagrams which follow.
(4) DIVERSION SYSTEM
<ul style="list-style-type: none"> • Not Applicable.
(5) TREATED DRAINAGE WATERS
<ul style="list-style-type: none"> • Not Applicable.
(c) BULK STORAGE CONTAINERS

(1) CONTAINER CONSTRUCTION AND MATERIALS
<ul style="list-style-type: none"> Tanks are designed and constructed (in accordance with API standards) with materials that are compatible with the products stored.
(2) SECONDARY CONTAINMENT
<ul style="list-style-type: none"> As required by 40 CFR 112.7(c), all of the storage tanks at this Facility are surrounded by earthen/gravel/ concrete dike systems, and (as discussed above) drainage/containment systems are in place for the truck & rail loading areas. Based on field observation, these dike systems are sufficiently impervious to oil and are capable of containing the entire capacity of the largest tank within each system (plus sufficient freeboard for precipitation). Dike capacities are provided on the Potential Spill Sources table below. These systems are specifically designed to prevent releases from leaving facility property.
(3) RAINWATER DRAINAGE
<ul style="list-style-type: none"> Secondary containment drain valves remain closed and locked (& pumps remain off) except during drainage events. Any water within diked areas will be inspected carefully before draining. The dike drainage procedure is as follows: <ul style="list-style-type: none"> 1. Any hydrocarbon sheen on the surface of the water will be removed prior to drainage. 2. Drainage will be conducted under responsible supervision, and the valve(s) will be closed/locked upon completion. 3. A dike drainage/inspection log will be completed and maintained in Facility files.
(4) BURIED METALLIC STORAGE TANKS
<ul style="list-style-type: none"> Not Applicable.
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40 CFR, 112.8
(c) BULK STORAGE CONTAINERS
(5) PARTIALLY BURIED METALLIC STORAGE TANKS
<ul style="list-style-type: none"> Not Applicable.
(6) ABOVEGROUND CONTAINERS
<ul style="list-style-type: none"> Aboveground storage tanks are inspected on a regular schedule per industry standards (e.g., API-653). Records of inspections and tests are maintained by the Company. Aboveground storage tanks are tested after material repairs, per applicable industry standards.
(7) INTERNAL HEATING COILS
<ul style="list-style-type: none"> Tanks at this Facility that are equipped with internal heating coils are monitored daily when in use (as are the return lines) by operating personnel for any signs of leakage.
(8) FAIL SAFE ENGINEERING
<ul style="list-style-type: none"> All of the bulk storage tanks at this Facility (not including small, fuel additive tanks) are equipped and operated as follows: <ul style="list-style-type: none"> 1. Direct visual gauges (ground level) and adequate roof vents to insure vacuum protection. 2. Facility personnel closely monitor all tank transfer operations, and will notify the pipeline control center or vessel personnel in the event of any abnormal situation. 3. Receiving tanks are gauged/checked prior to product transfers to ensure that there is sufficient room and that all valves are lined up properly. 4. Receipts into additive tanks are at low flow rates (via truck) and are constantly

monitored by Facility personnel.	
<ul style="list-style-type: none"> • 5. In addition, break-out tanks associated with the Fronter Pipeling system are equipped with dual-stage high-level alarms, with audible & visual signals. 	
<ul style="list-style-type: none"> • 6. All liquid level sensing devices discussed above are inspected and tested on a regular basis (in conjunction with product receipts and strict inventory procedures). 	
(9) EFFLUENT TREATMENT FACILITIES	
<ul style="list-style-type: none"> • Not Applicable. 	
(10) VISIBLE DISCHARGES	
<ul style="list-style-type: none"> • Visible oil leaks are noted and necessary repairs are made promptly. 	
(11) MOBILE/PORTABLE STORAGE CONTAINERS	
<ul style="list-style-type: none"> • Not Applicable. 	
(d) FACILITY TRANSFER OPERATIONS, PUMPING, AND FACILITY PROCESSES	
(1) BURIED PIPING	
<ul style="list-style-type: none"> • All buried piping at the facility is wrapped, coated, and/or cathodically protected to prevent corrosion. 	
<ul style="list-style-type: none"> • When a pipeline section is exposed it is examined and corrective action is taken as necessary. 	
(2) OUT OF SERVICE PIPING	
<ul style="list-style-type: none"> • Terminal piping connections are capped or blank-flanged and labeled if the piping is out of service or is in stand-by service for extended periods. 	
(3) PIPING SUPPORTS	
<ul style="list-style-type: none"> • All pipe supports are designed to minimize abrasion, corrosion, and allow for expansion and contraction. Maintenance procedures & upgrades are on-going. 	
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Brownsville Terminal Complex

40 CFR, 112.8	
(d) FACILITY TRANSFER OPERATIONS, PUMPING, AND FACILITY PROCESSES	
(4) ABOVEGROUND VALVE, PIPING AND APPURTENCE INSPECTIONS	
<ul style="list-style-type: none"> • All underground piping to/from bulk storage tanks is subject to periodic pressure testing (in accordance with USCG requirements and Best Mgt. Practices). 	
<ul style="list-style-type: none"> • All aboveground valves, piping, and appurtenances are given a documented inspection at least quarterly. 	
<ul style="list-style-type: none"> • In addition, all valves are inspected for signs of leakage at each use, according to valve line-up charts. 	
(5) VEHICULAR TRAFFIC	
<ul style="list-style-type: none"> • Notices are posted at terminal entrances, cautioning drivers about hazards associated with driving in the vicinity of exposed piping and tankage. 	
<ul style="list-style-type: none"> • In addition, all aboveground piping which is exposed to normal vehicular traffic is protected by curbing, barrier posts, and/or bumpers. 	
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Potential Spill Sources - Brownsville Terminal Complex

		Total	Secondary		Year	Quantity		
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Container/Source	Major Type of Failure	Capacity (bbl)	Containment Volume/Type (bbl)	Tank Type	Constructed/Installed	Stored (bbl)	Direction of Flow/Rate	Product Stored
ABOVEGROUND CONTAINERS (TANKS)								
1001	Leak/Rupture	(b) (7)(F)		V/C/Fx/W	1979	(b) (7)(F)	East/ Instantaneous	Out of Service
1002	Leak/Rupture			V/C/Fx/W	1979		North/ Instantaneous	Out of Service
1003	Leak/Rupture			V/Ef/W	1979		East/ Instantaneous	Gasolines
1004	Leak/Rupture			V/Ef/W	1979		East/ Instantaneous	Naptha
1005	Leak/Rupture			V/C/F/W	1979		North/ Instantaneous	Diesel / Distillate fuels
1006	Leak/Rupture			V/C/F/W	1979		North/ Instantaneous	Diesel / Distillate fuels
1007	Leak/Rupture			V/C/F/W	1979		North/ Instantaneous	Diesel / Distillate fuels
1008	Leak/Rupture			V/C/F/W	1979		North/ Instantaneous	Diesel / Distillate fuels
1009	Leak/Rupture			V/C/F/W	1979		North/ Instantaneous	Diesel / Distillate fuels
1010	Leak/Rupture			V/C/F/W	1979		North/ Instantaneous	Diesel / Distillate fuels
1011	Leak/Rupture			V/C/F/W	1979		North/ Instantaneous	Diesel / Distillate fuels
1012	Leak/Rupture			V/C/F/W	1979		North/ Instantaneous	Aviation Gasolines
1013	Leak/Rupture			V/C/Fx/W	1987		North/ Instantaneous	Diesel / Distillate fuels
1014	Leak/Rupture			V/C/Fx/W	1987		North/ Instantaneous	Diesel / Distillate fuels
1015	Leak/Rupture			V/C/Fx/W	1987		North/ Instantaneous	Diesel / Distillate fuels
1016	Leak/Rupture			V/C/Fx/W	1975		East/ Instantaneous	Transmix

Note: There are no underground storage tanks or surface impoundments located at this Facility.

* Not in Containment Area ** Curbing and containment system

Containment Type:? 1-Earthen Berm and Floor,? 2-Concrete Berm and Floor, 3-Concrete Berm / Earthen

Floor,?

4-Metal Berm and Floor, 5-Portable Containment or Inside Building, 6-Double Walled, 7-Synthetic Liner/Coating, 8-"Closed-Loop" Drainage System / Collection Tank, 9-Drainage System / Lined Retention Pond
Tank / Roof Type: C = Cone, D = Dome, H = Horizontal, Dw = Double walled, L = Lifter, S = Spheroid, V = Vertical,
 G = Geodesic, Fx = Fixed, F = Floating, W = Welded, R = Riveted, Ef = External Floating Roof

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Potential Spill Sources - Brownsville Terminal Complex, CONTINUED

Container/Source	Major Type of Failure	Total Capacity (bbl)	Secondary Containment Volume/Type (bbl)	Tank Type	Year Constructed/Installed	Quantity Stored (bbl)	Direction of Flow/Rate	Product Stored
ABOVEGROUND CONTAINERS (TANKS)								
1017	Leak/Rupture	(b) (7)(F)		V/C/Fx/W	1979	(b) (7)(F)	East/ Instantaneous	Petrol. Contact Water
1019	Leak/Rupture			V/C/F/W	2009		West/ Instantaneous	Gasolines
2100	Leak/Rupture			V/D/Fx/W	1974		North/ Instantaneous	Empty
2103	Leak/Rupture			V/C/Fx/W	1948		North/ Instantaneous	Vegetable Oils
2104	Leak/Rupture			V/C/Fx/W	1948		North/ Instantaneous	Vegetable Oils
2105	Leak/Rupture			V/C/Fx/W	1948		North/ Instantaneous	Vegetable Oils
2106	Leak/Rupture			V/C/Fx/W	1948		North/ Instantaneous	Vegetable Oils
2107	Leak/Rupture			V/C/Fx/W	1948		N/A	Empty
2108	Leak/Rupture			V/C/Fx/W	1948		N/A	Empty
2117	Leak/Rupture			V/C/Fx/W	1988		North/ Instantaneous	Fuel Oils (Nos. 4, 5, &/or 6)
2118	Leak/Rupture			V/C/Fx/W	1988		North/ Instantaneous	Fuel Oils (Nos. 4, 5, &/or 6)
2119	Leak/Rupture			V/C/Fx/W	1988		North/ Instantaneous	Fuel Oils (Nos. 4, 5, &/or 6)
2120	Leak/Rupture			V/C/Fx/W	1988		North/ Instantaneous	Fuel Oils (Nos. 4, 5, &/or 6)
2121	Leak/Rupture			V/C/Fx/W	1948		N/A	Fuel Oils (Nos. 4, 5,

		(b) (7)(F)			(b) (7)(F)	&/or 6)
2122	Leak/Rupture		V/C/Fx/W	1962		#6 Fuel Oil
2123	Leak/Rupture		V/C/Fx/W	1988	North/ Instantaneous	Fuel Oils (Nos. 4, 5, &/or 6)

Note: There are no underground storage tanks or surface impoundments located at this Facility.

* Not in Containment Area ** Curbing and containment system

Containment Type:? 1-Earthern Berm and Floor,? 2-Concrete Berm and Floor, 3-Concrete Berm / Earthern Floor,?

4-Metal Berm and Floor, 5-Portable Containment or Inside Building, 6-Double Walled, 7-Synthetic Liner/Coating, 8-"Closed-Loop" Drainage System / Collection Tank, 9-Drainage System / Lined Retention Pond

Tank / Roof Type: C = Cone, D = Dome, H = Horizontal,Dw = Double walled, L = Lifter, S = Spheroid, V = Vertical,

G = Geodesic, Fx = Fixed, F = Floating, W = Welded, R = Riveted, Ef = External Floating Roof

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Potential Spill Sources - Brownsville Terminal Complex, CONTINUED

Container/ Source	Major Type of Failure	Total Capacity (bbl)	Secondary Containment Volume/Type (bbl)	Tank Type	Year Constructed/ Installed	Quantity Stored (bbl)	Direction of Flow/Rate	Product Stored
ABOVEGROUND CONTAINERS (TANKS)								
2124	Leak/Rupture	(b) (7)(F)		V/C/Fx/W	1988	(b) (7)(F)	North/ Instantaneous	Fuel Oils (Nos. 4, 5, &/or 6)
2125	Leak/Rupture			V/C/Fx/W	1988		North/ Instantaneous	Fuel Oils (Nos. 4, 5, &/or 6)
2126	Leak/Rupture			V/C/Fx/W	1972		North/ Instantaneous	Glycols / Glycol Ethers
2127	Leak/Rupture			V/C/Fx/W	1948		North/ Instantaneous	Fuel Oils (Nos. 4, 5, &/or 6)
2128	Leak/Rupture			V/C/Fx/W	1948		North/ Instantaneous	Empty
2129	Leak/Rupture			V/C/Fx/W	1980		North/ Instantaneous	Fuel Oils (Nos. 4, 5, &/or 6)
2130	Leak/Rupture			V/C/Fx/W	1980		North/ Instantaneous	Fuel Oils (Nos. 4, 5, &/or 6)
2131	Leak/Rupture			V/C/Fx/W	1980		North/ Instantaneous	Fuel Oils (Nos. 4, 5, &/or 6)

2132	Leak/Rupture	(b) (7)(F)	V/C/Fx/W	1980	(b) (7)(F)	North/ Instantaneous	Empty
2140	Leak/Rupture	(b) (7)(F)	V/C/Fx/W	1948	(b) (7)(F)	N/A	Empty
2141	Leak/Rupture	(b) (7)(F)	V/C/Fx/W	1948	(b) (7)(F)	North/ Instantaneous	Empty
2142	Leak/Rupture	(b) (7)(F)	V/C/Fx/W	1948	(b) (7)(F)	N/A	Empty
2143	Leak/Rupture	(b) (7)(F)	V/C/Fx/W	1948	(b) (7)(F)	North/ Instantaneous	Empty
2144	Leak/Rupture	(b) (7)(F)	V/C/Fx/W	1948	(b) (7)(F)	N/A	Empty
2145	Leak/Rupture	(b) (7)(F)	V/C/Fx/W	1948	(b) (7)(F)	North/ Instantaneous	Empty
2146	Leak/Rupture	(b) (7)(F)	V/C/Fx/W	1948	(b) (7)(F)	North/ Instantaneous	Lubricating Oils

Note: There are no underground storage tanks or surface impoundments located at this Facility.

* Not in Containment Area ** Curbing and containment system

Containment Type:? 1-Earthern Berm and Floor,? 2-Concrete Berm and Floor, 3-Concrete Berm / Earthern Floor,?

4-Metal Berm and Floor, 5-Portable Containment or Inside Building, 6-Double Walled, 7-Synthetic Liner/Coating, 8-"Closed-Loop" Drainage System / Collection Tank, 9-Drainage System / Lined Retention Pond

Tank / Roof Type: C = Cone, D = Dome, H = Horizontal,Dw = Double walled, L = Lifter, S = Spheroid, V = Vertical,

G = Geodesic, Fx = Fixed, F = Floating, W = Welded, R = Riveted, Ef = External Floating Roof

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Potential Spill Sources - Brownsville Terminal Complex, CONTINUED

Container/ Source	Major Type of Failure	Total Capacity (bbl)	Secondary Containment Volume/Type (bbl)	Tank Type	Year Constructed/ Installed	Quantity Stored (bbl)	Direction of Flow/Rate	Product Stored
ABOVEGROUND CONTAINERS (TANKS)								
2148	Leak/Rupture	(b) (7)(F)	(b) (7)(F)	V/C/Fx/W	1948	(b) (7)(F)	North/ Instantaneous	Lubricating Oils
2150	Leak/Rupture	(b) (7)(F)	(b) (7)(F)	V/C/Fx/W	1948	(b) (7)(F)	N/A	Empty
2151	Leak/Rupture	(b) (7)(F)	(b) (7)(F)	V/C/Fx/W	1948	(b) (7)(F)	North/ Instantaneous	Empty
2152	Leak/Rupture	(b) (7)(F)	(b) (7)(F)	V/C/Fx/W	1948	(b) (7)(F)	North/ Instantaneous	Lubricating Oils
2153	Leak/Rupture	(b) (7)(F)	(b) (7)(F)	V/C/Fx/W	1948	(b) (7)(F)	North/ Instantaneous	Lubricating Oils
2154	Leak/Rupture	(b) (7)(F)	(b) (7)(F)	V/C/Fx/W	1948	(b) (7)(F)	North/ Instantaneous	Lubricating Oils
2155	Leak/Rupture	(b) (7)(F)	(b) (7)(F)	V/C/Fx/W	1948	(b) (7)(F)	North/ Instantaneous	Lubricating Oils

		(b) (7)(F)			(b) (7)(F)	Instantaneous	Oils
2156	Leak/Rupture		/C/Fx/W	1948		North/ Instantaneous	Lubricating Oils
2157	Leak/Rupture		/C/Fx/W	1948		North/ Instantaneous	Lubricating Oils
2158	Leak/Rupture		/C/Fx/W	1948		North/ Instantaneous	Lubricating Oils
3200	Leak/Rupture		/C/Fx/W	1960		North/ Instantaneous	Asphalt
3201	Leak/Rupture		/C/Fx/W	1960		North/ Instantaneous	Asphalt
3202	Leak/Rupture		/C/Fx/W	1960		North/ Instantaneous	Asphalt
3203	Leak/Rupture		/C/Fx/W	1972		North/ Instantaneous	Gasolines
3204	Leak/Rupture		V/C/F/W	1972		N/A	Gasolines
3205	Leak/Rupture		V/C/F/W	1972		North/ Instantaneous	Gasolines

Note: There are no underground storage tanks or surface impoundments located in this facility.

* Not in Containment Area ** Curbing and containment system

Containment Type:? 1-Earthern Berm and Floor,? 2-Concrete Berm and Floor, 3-Concrete Berm / Earthern Floor,?

4-Metal Berm and Floor, 5-Portable Containment or Inside Building, 6-Double Walled, 7-Synthetic Liner/Coating, 8-"Closed-Loop" Drainage System / Collection Tank, 9-Drainage System / Lined Retention Pond

Tank / Roof Type: C = Cone, D = Dome, H = Horizontal,Dw = Double walled, L = Lifter, S = Spheroid, V = Vertical,

G = Geodesic, Fx = Fixed, F = Floating, W = Welded, R = Riveted, Ef = External Floating Roof

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Potential Spill Sources - Brownsville Terminal Complex, CONTINUED

Container/ Source	Major Type of Failure	Total Capacity (bbl)	Secondary Containment Volume/Type (bbl)	Tank Type	Year Constructed/ Installed	Quantity Stored (bbl)	Direction of Flow/Rate	Product Stored
ABOVEGROUND CONTAINERS (TANKS)								
3206	Leak/Rupture	(b) (7)(F)		V/C/F/W	2004	(b) (7)(F)	North/ Instantaneous	Transmix
4203	Leak/Rupture			H/Fx/W	1945		North/ Instantaneous	Cyclohexanone
4204	Leak/Rupture			H/Fx/W	1945		North/ Instantaneous	Cyclohexanone
4303	Leak/Rupture			H/Fx/W	1945		North/ Instantaneous	Glycols / Glycol Ethers
4304	Leak/Rupture			H/Fx/W	1945		North/ Instantaneous	Glycols / Glycol Ethers

4305	Leak/Rupture	(b) (7)(F)	H/Fx/W	1945	(b) (7)(F)	N/A	Empty
4311	Leak/Rupture	(b) (7)(F)	V/C/Fx/W	1949	(b) (7)(F)	N/A	Vegetable Oils
4312	Leak/Rupture	(b) (7)(F)	V/C/Fx/W	1949	(b) (7)(F)	N/A	Vegetable Oils
4313	Leak/Rupture	(b) (7)(F)	V/C/Fx/W	unknown	(b) (7)(F)	N/A	Empty
4314	Leak/Rupture	(b) (7)(F)	V/C/F/W	1949	(b) (7)(F)	N/A	Empty
4315	Leak/Rupture	(b) (7)(F)	V/C/Fx/W	1949	(b) (7)(F)	North/ Instantaneous	Empty
5001	Leak/Rupture	(b) (7)(F)	V/Ef/G/W	1954	(b) (7)(F)	East/ Instantaneous	Gasolines
5002	Leak/Rupture	(b) (7)(F)	V/Ef/G/W	1954	(b) (7)(F)	West/ Instantaneous	Ethanol (denatured)
5003	Leak/Rupture	(b) (7)(F)	V/C/Fx/W	1935	(b) (7)(F)	North/ Instantaneous	Gasolines
5004	Leak/Rupture	(b) (7)(F)	V/C/Fx/W	1935	(b) (7)(F)	North/ Instantaneous	Diesel / Distillate fuels
5005	Leak/Rupture	(b) (7)(F)	V/C/F/W	1963	(b) (7)(F)	North/ Instantaneous	Transmix

Note: There are no underground storage tanks or surface impoundments located in this facility.
 * Not in Containment Area ** Curbing and containment system

Containment Type:? 1-Earthen Berm and Floor, ? 2-Concrete Berm and Floor, 3-Concrete Berm / Earthen Floor, ? 4-Metal Berm and Floor, 5-Portable Containment or Inside Building, 6-Double Walled, 7-Synthetic Liner/Coating, 8-"Closed-Loop" Drainage System / Collection Tank, 9-Drainage System / Lined Retention Pond

Tank / Roof Type: C = Cone, D = Dome, H = Horizontal, Dw = Double walled, L = Lifter, S = Spheroid, V = Vertical, G = Geodesic, Fx = Fixed, F = Floating, W = Welded, R = Riveted, Ef = External Floating Roof

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Potential Spill Sources - Brownsville Terminal Complex, CONTINUED

Container/ Source	Major Type of Failure	Total Capacity (bbl)	Secondary Containment Volume/Type (bbl)	Tank Type	Year Constructed/ Installed	Quantity Stored (bbl)	Direction of Flow/Rate	Product Stored
ABOVEGROUND CONTAINERS (TANKS)								
5096	Leak/Rupture	(b) (7)(F)	(b) (7)(F)	H/Fx/W	2010	(b) (7)(F)	North-NE/ nstantaneous	Fuel Additives
5097	Leak/Rupture	(b) (7)(F)	(b) (7)(F)	H/Fx/W	2010	(b) (7)(F)	North-NE/ nstantaneous	Fuel Additives
5098	Leak/Rupture	(b) (7)(F)	(b) (7)(F)	H/Fx/W	2010	(b) (7)(F)	North-NE/ nstantaneous	Fuel Additives
5099	Leak/Rupture	(b) (7)(F)	(b) (7)(F)	H/Fx/W	2010	(b) (7)(F)	North-NE/	Off-Spec.

		(b) (7)(F)			(b) (7)(F)	Instantaneous	Product
6500	Leak/Rupture		V/C/Fx/W	1974		North/ Instantaneous	Waxes
6501	Leak/Rupture		V/C/Fx/W	1982		North/ Instantaneous	Waxes
6502	Leak/Rupture		V/C/Fx/W	1974		East/ Instantaneous	Waxes
6503	Leak/Rupture		H/Fx/W	unknown		N / A	Empty
6504	Leak/Rupture		H/Fx/W	unknown		N / A	Empty
6505	Leak/Rupture		H/Fx/W	1945		N/A	Empty
6506	Leak/Rupture		H/Fx/W	1945		N / A	Empty
6507	Leak/Rupture		H/Fx/W	1945		N / A	Empty
6508	Leak/Rupture		H/Fx/W	1945		East/ Instantaneous	Glycols / Glycol Ethers
6510	Leak/Rupture		V/C/Fx/W	1976		North/ Instantaneous	Waxes
6511	Leak/Rupture		V/C/Fx/W	1974		North/ Instantaneous	Waxes
6515	Leak/Rupture		V/C/Fx/W	1974		N/A	Waxes

Note: There are no underground storage tanks or surface impoundments located at this Facility.

* Not in Containment Area ** Curbing and containment system

Containment Type:? 1-Earthern Berm and Floor,? 2-Concrete Berm and Floor, 3-Concrete Berm / Earthern Floor,?

4-Metal Berm and Floor, 5-Portable Containment or Inside Building, 6-Double Walled, 7-Synthetic Liner/Coating, 8-"Closed-Loop" Drainage System / Collection Tank, 9-Drainage System / Lined Retention Pond

Tank / Roof Type: C = Cone, D = Dome, H = Horizontal,Dw = Double walled, L = Lifter, S = Spheroid, V = Vertical,

G = Geodesic, Fx = Fixed, F = Floating, W = Welded, R = Riveted, Ef = External Floating Roof

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Potential Spill Sources - Brownsville Terminal Complex, CONTINUED

Container/ Source	Major Type of Failure	Total Capacity (bbl)	Secondary Containment Volume/Type (bbl)	Tank Type	Year Constructed/ Installed	Quantity Stored (bbl)	Direction of Flow/Rate	Product Stored
ABOVEGROUND CONTAINERS (TANKS)								
6516	Leak/Rupture	(b) (7)(F)		V/C/Fx/W	1974	(b) (7)(F)	East/ Instantaneous	Waxes
6520	Leak/Rupture			V/C/Fx/W	1945		North/	Waxes

		(b) (7)(F)			(b) (7)(F)	Instantaneous	
6521	Leak/Rupture		V/C/Fx/W	1945		N/A	Waxes
6551	Leak/Rupture		V/C/Fx/W	1949		N/A	Out of Service
6570	Leak/Rupture		V/C/Fx/W	1979		N/A	Empty
7001	Leak/Rupture		V/C/Fx/W	1987		North/ Instantaneous	Automatic Transmission Fluid
7002	Leak/Rupture		V/C/Fx/W	1987		North/ Instantaneous	Empty
7003	Leak/Rupture		V/C/Fx/W	unknown		N / A	Out of Service
7004	Leak/Rupture		V/C/Fx/W	1987		North/ Instantaneous	Empty
7005	Leak/Rupture		V/C/Fx/W	unknown		North/ Instantaneous	Boiler Blowdown Water
7007	Leak/Rupture		V/C/Fx/W	unknown		North/ Instantaneous	Lignite

Note: There are no underground storage tanks or surface impoundments located at this Facility.

* Not in Containment Area ** Curbing and containment system

Containment Type:? 1-Earthern Berm and Floor,? 2-Concrete Berm and Floor, 3-Concrete Berm / Earthern Floor,?

4-Metal Berm and Floor, 5-Portable Containment or Inside Building, 6-Double Walled, 7-Synthetic Liner/Coating, 8-"Closed-Loop" Drainage System / Collection Tank, 9-Drainage System / Lined Retention Pond

Tank / Roof Type: C = Cone, D = Dome, H = Horizontal,Dw = Double walled, L = Lifter, S = Spheroid, V = Vertical,

G = Geodesic, Fx = Fixed, F = Floating, W = Welded, R = Riveted, Ef = External Floating Roof

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CERTIFICATION & APPLICABILITY OF SUBSTANTIAL HARM

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

Does the facility have a total oil storage capacity greater than or equal to 1 million gallons and, within any storage area, does the facility lack secondary containment that is sufficiently large to contain the capacity of the largest above ground oil storage tank plus sufficient freeboard to allow for precipitation? **No**

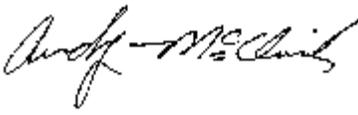
Does the facility have a total oil storage capacity greater than or equal to 1 million gallons and is the facility located at distance [as calculated using the appropriate formula in Appendix C-III (59 FR 34105) or a comparable formula] such that a discharge from the facility could cause injury to fish and wildlife and sensitive environments? **Yes**

Does the facility have a total oil storage capacity greater than or equal to 1 million gallons and is the facility located at a distance (as calculated using the appropriate formula in Appendix C or a comparable formula) such that a discharge from the facility would shut down a public drinking water intake? **No**

Does the facility have a total oil storage capacity greater than or equal to 1 million gallons and has the facility experienced a reportable oil spill in an amount greater than or equal to 10,000 gallons within the last 5 years? **No**

CERTIFICATION

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

Signature:	
Name:	Andy McClish
Title:	Manager, Regulatory Compliance
Date:	September 1, 2011

Brownsville Terminal Complex September 2004

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Brownsville Terminal Complex

SPCC CERTIFICATION

40 CFR, Part 112.3(d) Professional Engineer Certification

Being familiar with the provisions of 40 CFR, Part 112, I attest to the following:

- I am familiar with the requirements of this part
- I or my agent has visited and examined the Facility
- The Plan has been prepared in accordance with good engineering practice, including consideration of applicable industry standards, and with the requirements of this part
- Procedures for required inspections and testing have been established
- The Plan is adequate for the Facility

Note: Certification is conditional pending satisfactory resolution of the required improvements listed in Addendum 1.

Printed Name of Registered Professional Engineer:	Michael S. McKee
---	------------------

Signature of Registered Professional Engineer:	
--	--

	
Date:	9-14-2011
Registration No.:	106409
Seal:	

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Brownsville Terminal Complex

SPCC STATE REGULATIONS PER 40 CFR 112.7(j)

REGULATION	DESCRIPTION
30 TAC, Chapter 334, Subchapter F	Storage tanks must be constructed and operated in accordance with state and local requirements.

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Brownsville Terminal Complex

ADDENDUM 1

Certification of this Spill Prevention Control and Countermeasure plan is contingent upon correction of all discrepancies listed in this Addendum. The discrepancies for this facility are:

There are no required improvements at this facility.

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FACILITY DRAINAGE PLOT PLANS

[Click here to view Brownsville Terminal Complex Plot Plan DRAINAGE DIAGRAM a](#)

[Click here to view Brownsville Terminal Complex Plot Plan DRAINAGE DIAGRAM b](#)

[Click here to view Brownsville Terminal Complex Plot Plan DRAINAGE DIAGRAM c](#)

[Click here to view Brownsville Terminal Complex Plot Plan DRAINAGE DIAGRAM d](#)

[Click here to view Brownsville Terminal Complex Plot Plan DRAINAGE DIAGRAM e](#)

[Click here to view Brownsville Terminal Complex Plot Plan DRAINAGE DIAGRAM f](#)

[Click here to view Brownsville Terminal Complex Plot Plan DRAINAGE DIAGRAM g](#)

[Click here to view Brownsville Terminal Complex Plot Plan DRAINAGE DIAGRAM h](#)

[Click here to view Brownsville Terminal Complex Plot Plan DRAINAGE DIAGRAM i](#)

[Click here to view Brownsville Terminal Complex Plot Plan DRAINAGE DIAGRAM j](#)

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COMPANY SPCC FORMS

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FIGURE E-1 - SPCC PLAN REVIEW AND EVALUATION LOG

In accordance with 40 CFR 112.5(b), the SPCC Plan must be reviewed and evaluated every 5 years. As a result of this review and evaluation, the SPCC Plan must be amended within six months of the review to include more effective prevention and control technology if the technology has been field-proven at the time of the review and will significantly reduce the likelihood of a discharge.

I have completed review and evaluation of the SPCC Plan for Brownsville Terminal Complex

on , and amend the Plan as a result.

Signature:

Title:

Date:

I have completed review and evaluation of the SPCC Plan for Brownsville Terminal Complex

on , and amend the Plan as a result.

Signature: _____
Title: _____
Date: _____

I have completed review and evaluation of the SPCC Plan for Brownsville Terminal Complex on , and amend the Plan as a result.

Signature: _____
Title: _____
Date: _____

I have completed review and evaluation of the SPCC Plan for Brownsville Terminal Complex on , and amend the Plan as a result.

Signature: _____
Title: _____
Date: _____

I have completed review and evaluation of the SPCC Plan for Brownsville Terminal Complex on , and amend the Plan as a result.

Signature: _____
Title: _____
Date: _____

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FIGURE E-2 - DISCHARGE PREVENTION TRAINING LOG

Spill Prevention Briefings

- Company personnel are kept knowledgeable of equipment, safety factors and operating conditions.
- Annual training sessions are conducted by the Production Foreman to assure oil handling

FIGURE E-7 - MANAGEMENT APPROVAL AND REVIEW

I hereby approve the contents of the Facility's Spill Prevention, Control, and Countermeasure Plan (SPCC Plan) and have the authority to commit the necessary resources to implement the SPCC Plan, as set forth in this document, in accordance with the federal requirements of 40 CFR Part 112.

Name:	Don Griffin	Signature:	
Title:	General Mgr., Operations	Date:	September 1, 2011

APPENDIX F

CROSS-REFERENCE / APPLICABILITY OF SUBSTANTIAL HARM / CERTIFICATION

Figure F-1 - EPA Cross-Reference

Figure F-2 - USCG Cross-Reference

Figure F-3 - DOT / RSPA Cross-Reference

Figure F-4 - OSHA Cross-Reference

Figure F-5 - EPA / SPCC Cross-Reference

F.1 Response Plan Cover Sheet

F.1.1 General Information

F.1.2 Applicability of Substantial Harm / Certification

FIGURE F-1 - EPA CROSS-REFERENCE

EPA OPA 90 REQUIREMENTS (40 CFR 112)	LOCATION IN THIS PLAN
Note: Section numbers indicated below correspond to sections in the model response plan in Appendix F of the Facility Response Plan (FRP) rule.	
1.0 Response Plan Cover Sheet (EPA Sec. 2.0)	
a. General Information (Sec. 2.1)	Appendix F.1.1
b. Applicability of Substantial Harm Criteria (Sec. 2.2)	Appendix F.1.2
c. Certification (Sec. 2.3)	Appendix F.1.2
2.0 Emergency Response Action Plan (ERAP) (Sec. 1.1)	
a. Qualified Individual (QI) Information (Sec. 1.2)	ERAP
b. Emergency Notification List (Sec. 1.3.1)	ERAP
c. Spill Response Notification Form (Sec. 1.3.1)	ERAP
d. Response Equipment List and Location (Sec. 1.3.2)	ERAP
e. Response Equipment Testing and Deployment (Sec. 1.3.3)	ERAP
f. Facility Response Team List (Sec. 1.3.4)	ERAP
g. Evacuation Plan (Sec. 1.3.5)	ERAP
h. Immediate Actions (Sec. 1.7.1)	ERAP
i. Facility Diagrams (Sec. 1.9)	ERAP
*The sections above should be extracted from the more detailed corresponding sections of the plan.	
3.0 Facility Information (Sec. 1.2)	
a. Facility name (Sec. 1.2.1)	Figure 1-3
b. Street address	Figure 1-3
c. City, State, Zip	Figure 1-3

d. County	Figure 1-3
e. Phone number	Figure 1-3
f. Latitude/Longitude (Sec. 1.2.2)	Figure 1-3
g. Wellhead protection area (Sec. 1.2.3)	Figure 1-3
h. Owner/operator (both names included, if different) (Sec. 1.2.4)	Figure 1-3
i. QI Information (Sec. 1.2.5) <i>(Name, position, street address, phone numbers)</i>	Figure 1-3
1. Description of specific response training experience	Appendix A
j. Oil storage start-up date (Sec. 1.2.6)	Figure 1-3
k. Facility operations description (Sec. 1.2.7)	Figure 1-3
l. Standard Industrial Classification code	Appendix F.1.1
m. Dates and types of substantial expansion (Sec. 1.2.8)	Figure 1-3; Appendix E

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FIGURE F-1 - EPA CROSS-REFERENCE, CONTINUED

EPA OPA 90 REQUIREMENTS (40 CFR 112)	LOCATION IN THIS PLAN
Note: Section numbers indicated below correspond to sections in the model response plan in Appendix F of the Facility Response Plan (FRP) rule.	
4.0 Emergency Response Information (Sec. 1.3)	
Notification (Sec. 1.3.1)	Section 3
a. Emergency Notification Phone list	Section 3
1. National Response Center phone number	Section 3
2. QI (day and evening) phone numbers	Section 3
3. Company response team (day and evening) phone numbers	Section 3
4. Federal On-Scene Coordinator (OS and/or Regional response center (day and evening) phone numbers	Section 3

5. Local response team phone numbers (Fire Department/Cooperatives)	Section 3
6. Fire marshal (day and evening) phone numbers	Section 3
7. SERC (day and evening) phone numbers	Section 3
8. State police phone number	Section 3
9. LEPC phone number	Section 3
10. Wastewater treatment facility (s) name and phone number (recommended)	Section 3
11. Local water supply system (day and evening) phone numbers	Section 3
12. Weather report phone number	Section 3
13. Local TV/radio phone number(s) for evacuation notification	Section 3
14. Hospital phone number	Section 3
b. Spill Response Notification Form	Figure 3.2-2
5.0 Response Equipment List (Sec. 1.3.2)	
a. Skimmer Pumps	Section 7; Figure A.2-5; Appendix B
1. Operational Status	Section 7; Figure A.2-5; Appendix B
2. Type, Model and Year	Section 7; Figure A.2-5; Appendix B
3. Number	Section 7; Figure A.2-5; Appendix B
4. Capacity	Section 7; Figure A.2-5; Appendix B
5. Daily Effective Recovery Rate	Section 7; Figure A.2-5; Appendix B
6. Storage Location(s)	Section 7; Figure A.2-5; Appendix B
7. Date Fuel Last Changed	Section 7; Figure A.2-5; Appendix B

FIGURE F-1 - EPA CROSS-REFERENCE, CONTINUED

EPA OPA 90 REQUIREMENTS (40 CFR 112)	LOCATION IN THIS PLAN
Note: Section numbers indicated below correspond to sections in the model response plan in Appendix F of the Facility Response Plan (FRP) rule.	
b. Boom	Section 7; Figure A.2-5; Appendix B
1. Operational Status	Section 7; Figure A.2-5; Appendix B
2. Type, Model and Year	Section 7; Figure A.2-5; Appendix B
3. Number	Section 7; Figure A.2-5; Appendix B
4. Size (length)	Section 7; Figure A.2-5; Appendix B
5. Containment Area	Section 7; Figure A.2-5; Appendix B
6. Storage Location	Section 7; Figure A.2-5; Appendix B
c. Chemicals Stored	Section 7; Figure A.2-5; Appendix B
1. Date Authorized	Section 7; Figure A.2-5; Appendix B
d. Dispersant Dispensing Equipment	Section 7; Figure A.2-5; Appendix B
1. Operational Status	Section 7; Figure A.2-5; Appendix B
2. Type and Year	Section 7; Figure A.2-5; Appendix B
3. Capacity	Section 7; Figure A.2-5; Appendix B
4. Storage Location	Section 7; Figure A.2-5; Appendix B
5. Response Time	Section 7; Figure A.2-5; Appendix B
e. Sorbents	Section 7; Figure A.2-5; Appendix B
1. Operational Status	Section 7; Figure A.2-5; Appendix B
2. Type and Year	Section 7; Figure A.2-5; Appendix B
3. Amount	Section 7; Figure A.2-5; Appendix B

4. Absorption Capacity	Section 7; Figure A.2-5; Appendix B
5. Storage Location	Section 7; Figure A.2-5; Appendix B
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FIGURE F-1 - EPA CROSS-REFERENCE, CONTINUED

EPA OPA 90 REQUIREMENTS (40 CFR 112)	LOCATION IN THIS PLAN
Note: Section numbers indicated below correspond to sections in the model response plan in Appendix F of the Facility Response Plan (FRP) rule.	
f. Hand Tools	Section 7; Figure A.2-5; Appendix B
1. Operational Status	Section 7; Figure A.2-5; Appendix B
2. Type and Year	Section 7; Figure A.2-5; Appendix B
3. Quantity	Section 7; Figure A.2-5; Appendix B
4. Storage Location	Section 7; Figure A.2-5; Appendix B
g. Communication Equipment	Section 7; Figure A.2-5; Appendix B
1. Operational Status	Section 7; Figure A.2-5; Appendix B
2. Type and Year	Section 7; Figure A.2-5; Appendix B
3. Quantity	Section 7; Figure A.2-5; Appendix B
4. Storage Location/Number	Section 7; Figure A.2-5; Appendix B
h. Fire Fighting and Personnel Protective Equipment	Section 7; Figure A.2-5; Appendix B
1. Operational Status	Section 7; Figure A.2-5; Appendix B
2. Type and Year	Section 7; Figure A.2-5; Appendix B
3. Quantity	Section 7; Figure A.2-5; Appendix B
4. Storage Location	Section 7; Figure A.2-5; Appendix B
i. Other (e.g. Heavy Equipment, Boats and Motors)	Section 7; Figure A.2-5; Appendix B

1. Operational Status	Section 7; Figure A.2-5; Appendix B
2. Type and Year	Section 7; Figure A.2-5; Appendix B
3. Quantity	Section 7; Figure A.2-5; Appendix B
4. Storage Location	Section 7; Figure A.2-5; Appendix B
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FIGURE F-1 - EPA CROSS-REFERENCE, CONTINUED

EPA OPA 90 REQUIREMENTS (40 CFR 112)	LOCATION IN THIS PLAN
Note: Section numbers indicated below correspond to sections in the model response plan in Appendix F of the Facility Response Plan (FRP) rule.	
6.0? Response Equipment Testing and Deployment Drill Log (Sec. 1.3.3)	
a. Date of Last Inspection or Equipment Test	Section 7; Figure A.2-4
b. Inspection Frequency	Section 7; Figure A.2-4
c. Date of Last Deployment Drill	Section 7; Figure A.2-4
d. Deployment Frequency	Section 7; Figure A.2-4
e. OSRO Certification	Section 7; Figure A.2-4
7.0? Personnel (Sec. 1.3.4)	
a. Emergency Response Personnel Information	Figure 3.4-1
1. Name	Figure 3.4-1
2. Phone numbers	Figure 3.4-1
3. Response time	Section 4.3
4. Responsibility	Section 4.6
5. Type and date of response training	Appendix A
b. Emergency Response Contractor Information	Section 7; Appendix B
1. Name	Appendix B

2. Phone numbers	Figure 3.4-1
3. Response time	Appendix B
4. Evidence of contractual agreement	Appendix B
c. Facility Response Contractor Information	Section 3; Section 4; Section 7
1. Job title/position of emergency response personnel	Section 3; Section 4; Section 7
1.1 Response Time	Section 3; Section 4; Section 7
1.2 Phone/pager	
2. Name of emergency response contractor (Contractors providing facility response team services may be different than contractors providing oil spill response services)	Section 3; Section 4; Section 7
2.1 Response time	Section 3; Section 4; Section 7
2.2 Phone/pager	Section 3; Section 4; Section 7
8.0 Evacuation Plan (Sec. 1.3.5)	
a. Facility Evacuation Plan (Sec. 1.3.5.1)	Section 2
1. Location of stored materials	Section 2
2. Hazard imposed by spilled materials	Section 2

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FIGURE F-1 - EPA CROSS-REFERENCE, CONTINUED

EPA OPA 90 REQUIREMENTS (40 CFR 112)	LOCATION IN THIS PLAN
Note: Section numbers indicated below correspond to sections in the model response plan in Appendix F of the Facility Response Plan (FRP) rule.	
3. Spill flow direction	Section 2
4. Prevailing wind directions and speed	Section 2
5. Water currents, tides or wave conditions (if applicable)	Section 2

6. Arrival route of emergency response personnel and response equipment	Section 2
7. Evacuation routes	Section 2
8. Alternative routes of evacuation	Section 2
9. Transportation of injured personnel to nearest emergency medical facility	Section 2
10. Location of alarm/notification systems	Section 2
11. Centralized check-in area for roll call	Section 2
12. Mitigation command center location	Section 2
13. Location of shelter at facility	Section 2
b. Community Evacuation Plans referenced (Sec. 1.3.5.3)	Section 2
9.0 Description of Qualified Individual's Duties (Sec. 1.3.5)	
a. Activate internal alarms and hazard communication systems	Section 4.5
b. Notify response personnel	Section 4.5
c. Identify character, exact source, amount and extent of the release	Section 4.5
d. Notify and provide information to appropriate Federal, State and Local authorities	Section 4.5
e. Assess interaction of spilled substance with water and/or other substances stored at facility and notify on-scene response personnel of assessment	Section 4.5
f. Assess possible hazards to human health and the environment	Section 4.5
g. Assess and implement prompt removal actions	Section 4.5
h. Coordinate rescue and response actions	Section 4.5
i. Access company funding to initiate cleanup activities	Section 4.5
j. Direct cleanup activities	Section 4.5
10.0 Hazard Evaluation (Sec. 1.4)	

a. Hazard Identification (Sec. 1.4.1)	Appendix D
1. Tank and Surface Impoundment Forms	Appendix D
1.1 Tanks	Appendix D
a. Tanks Number(s)	Appendix D
b. Substance(s) Stored	Appendix D
c. Quantity(s) Stored	Appendix D
d. Tank Type(s)/Year(s)	Appendix D

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FIGURE F-1 - EPA CROSS-REFERENCE, CONTINUED

EPA OPA 90 REQUIREMENTS (40 CFR 112)	LOCATION IN THIS PLAN
Note: Section numbers indicated below correspond to sections in the model response plan in Appendix F of the Facility Response Plan (FRP) rule.	
e. Maximum Capacity(s)	Appendix D
f. Failure(s)/Cause(s)	Appendix D
1.2 Surface Impoundments (SI)	N/A
a. SI Number(s)	N/A
b. Substance(s) Stored	N/A
c. Quantity(s) Stored	N/A
d. Surface Area(s)/Year(s)	N/A
e. Maximum Capacity(s)	N/A
f. Failure(s)/Cause(s)	N/A
2. Labeled schematic drawing	Figure 1-4
3. Description of transfers (loading and unloading) and volume of material	Figure 1-3; Appendix D

4. Description of daily operations	Figure 1-3
5. Secondary containment volume	Appendix D
6. Normal daily throughput of the facility	Figure 1-3
11.0 Vulnerability Analysis (Sec. 1.4.2) (see Appendix A - Calculation of the Planning Distance)	
a. Analysis of potential effects of an oil spill on vulnerable areas	Section 6; Appendix D.1.3
1. Water Intake	Section 6; Appendix D.1.3
2. Schools	Section 6; Appendix D.1.3
3. Medical facilities	Section 6; Appendix D.1.3
4. Residential areas	Section 6; Appendix D.1.3
5. Businesses	Section 6; Appendix D.1.3
6. Wetlands or other sensitive environments	Section 6; Appendix D.1.3
7. Fish and wildlife	Section 6; Appendix D.1.3
8. Lake and streams	Section 6; Appendix D.1.3
9. Endangered flora and fauna	Section 6; Appendix D.1.3
10. Recreational areas	Section 6; Appendix D.1.3

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FIGURE F-1 - EPA CROSS-REFERENCE, CONTINUED

EPA OPA 90 REQUIREMENTS (40 CFR 112)	LOCATION IN THIS PLAN
Note: Section numbers indicated below correspond to sections in the model response plan in Appendix F of the Facility Response Plan (FRP) rule.	
11. Transportation routes (air, land and water)	Section 6; Appendix D.1.3
12. Utilities	Section 6; Appendix D.1.3
13. Other applicable areas	Section 6; Appendix D.1.3

12.0 Analysis of the Potential for an Oil Spill (Sec. 1.4.3)	
1. Description of likelihood of release occurring	Appendix D.1.3
a. Oil spill history for the life of the facility	Figure D-6
b. Horizontal range of potential spill	Figure D-5
c. Vulnerability to natural disaster	Section 2.4
d. Tank age	Appendix D
e. Other factors (e.g., unstable soils, earthquake zones, Karst topography, etc.)	Section 2.4; Appendix D.1.3
13.0 Facility Reportable Oil Spill History Description (Sec. 1.4.4)	
a. Date of discharge(s)	Figure D-6
b. List of discharge causes	Figure D-6
c. Material(s) discharged	Figure D-6
d. Amount of discharges in gallons	Figure D-6
e. Amount that reached navigable waters (if applicable)	Figure D-6
f. Effectiveness and capacity of secondary containment	Figure D-6
g. Clean-up actions taken	Figure D-6
h. Steps taken to reduce possibility of reoccurrence	Figure D-6
i. Total oil storage capacity of tank(s) or impoundment(s) from which material discharged	Figure D-6
j. Enforcement actions	Figure D-6
k. Effectiveness of monitoring equipment	Figure D-6
l. Spill detection	Figure D-6
14.0 Discharge Scenario (Sec. 1.5)	
Small Discharges (Sec. 1.5.1)	Appendix D.3
a. Description of small discharge scenario addressing facility operations and components (Sec. 1.5.1.1)	Appendix D.3

1. Loading and unloading operations	Appendix D.3
2. Facility maintenance operations	Appendix D.3
3. Facility piping	Appendix D.3
4. Pumping stations and sumps	Appendix D.3
5. Oil storage tanks	Appendix D.3

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FIGURE F-1 - EPA CROSS-REFERENCE, CONTINUED

EPA OPA 90 REQUIREMENTS (40 CFR 112)	LOCATION IN THIS PLAN
Note: Section numbers indicated below correspond to sections in the model response plan in Appendix F of the Facility Response Plan (FRP) rule.	
6. Vehicle refueling operations	Appendix D.3
7. Age and condition of facility and components	Appendix D.3
b. Description of factors affecting response efforts (Sec. 1.5.1.2)	Appendix D.3
1. Size of spill	Appendix D.3
2. Proximity to downgradient water	Appendix D.3
3. Proximity to fish and wildlife and sensitive environments	Appendix D.3
4. Likelihood that discharge will travel offsite	Appendix D.3
5. Location of material spilled (i.e., on concrete pad or soil)	Appendix D.3
6. Material discharged	Appendix D.3
7. Weather or aquatic conditions	Appendix D.3
8. Available remediation equipment	Appendix D.3
9. Probability of a chain reaction or failures	Appendix D.3
10. Direction of spill pathway	Appendix D.3
Medium Discharge (Sec. 1.5.1)	Appendix D.3

c. Description of medium discharge scenario addressing facility operations and components (Sec. 1.5.1.1)	Appendix D.3
1. Loading and unloading operations	Appendix D.3
2. Facility maintenance operations	Appendix D.3
3. Facility piping	Appendix D.3
4. Pumping stations and sumps	Appendix D.3
5. Oil storage tanks	Appendix D.3
6. Vehicle refueling operations	Appendix D.3
7. Age and condition of facility and components	Appendix D.3
d. Description of factors affecting response efforts (Sec. 1.5.1.2)	Appendix D.3.3
1. Size of spill	Appendix D.3.3
2. Proximity to downgradient water	Appendix D.3.3
3. Proximity to fish and wildlife and sensitive environments	Appendix D.3.3
4. Likelihood that discharge will travel offsite	Appendix D.3.3
5. Likelihood of material spilled (i.e., on concrete pad or soil)	Appendix D.3.3
6. Material discharge	Appendix D.3.3
7. Weather or aquatic conditions	Appendix D.3.3
8. Available remediation equipment	Appendix D.3.3
9. Probability of a chain reaction or failures	Appendix D.3.3
10. Direction of spill pathway	Appendix D.3.3

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FIGURE F-1 - EPA CROSS-REFERENCE, CONTINUED

EPA OPA 90 REQUIREMENTS (40 CFR 112)	
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Note: Section numbers indicated below correspond to sections in the model response plan in Appendix F of the Facility Response Plan (FRP) rule.	LOCATION IN THIS PLAN
15.0 Worst Case Discharge (Sec. 1.5.2) (See Appendix A)	
a. Correct Worst Case Discharge calculation for specific type of facility	Appendix D.3
b. Description of worst case discharge scenario	Appendix D.3
1. Loading and unloading operations	Appendix D.3
2. Facility maintenance operations	Appendix D.3
3. Facility piping	Appendix D.3
4. Pumping stations and sumps	Appendix D.3
5. Oil storage tanks	Appendix D.3
6. Vehicle refueling operations	Appendix D.3
7. Age and condition of facility and components	Appendix D.3
c. Description of factors affecting response efforts (Sec. 1.5.1.2)	Appendix D.3
1. Size of spill	Appendix D.3.3
2. Proximity to downgradient water	Appendix D.3.3
3. Proximity to fish and wildlife and sensitive environments	Appendix D.3.3
4. Likelihood that discharge will travel offsite	Appendix D.3.3
5. Location of material spilled (i.e., on concrete pad or soil)	Appendix D.3.3
6. Material discharged	Appendix D.3.3
7. Weather or aquatic conditions	Appendix D.3.3
8. Available remediation equipment	Appendix D.3.3
9. Probability of a chain reaction or failures	Appendix D.3.3
10. Direction of spill pathway	Appendix D.3.3
16.0 Discharge Detection Systems (Sec. 1.6)	

Discharge Detection by Personnel (Sec. 1.6.1)	Appendix D; Appendix E
a. Description of procedures and personnel for spill detection	Section 2; Appendix D
b. Description of facility inspections	Appendix E
c. Description of initial response actions	Section 2
d. Emergency Response Information (referenced)	Section 3
17.0 Automated Discharge Detection (Sec. 1.6.2)	
a. Description of automatic spill detection equipment, including overfill alarms and secondary containment sensors	Appendix D.1
b. Description of alarm verification procedures and subsequent actions	Appendix D.1; Section 2
18.0 Plan Implementation (Sec 1.7)	
a. Identification of response resources for small, medium and worst case spills (Sec. 1.7.1)	Section 4; Section 7; Appendix B
b. Description of response actions	Section 2
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FIGURE F-1 - EPA CROSS-REFERENCE, CONTINUED

EPA OPA 90 REQUIREMENTS (40 CFR 112)	LOCATION IN THIS PLAN
Note: Section numbers indicated below correspond to sections in the model response plan in Appendix F of the Facility Response Plan (FRP) rule.	
1. Emergency plans for spill response	Section 2
2. Additional response training	Appendix A
3. Additional contracted help	Section 7; Appendix B
4. Access to additional response equipment/experts	Section 7; Appendix B
5. Ability to implement plan.? Including response training and practice drills.	Appendix A
19.0 Disposal Plan (Sec. 1.7.2)	
a. Description of procedures for recovering, reusing, decontaminating or disposing of materials	Section 5; Section 7.4

<p>b. Materials addressed in Disposal Plan</p> <p>(Recovered product, contaminated soil, contaminated equipment and materials, personnel protective equipment, decontamination solutions, absorbents, spent chemicals)</p>	<p>Section 5; Section 7.4</p>
<p>c. Plan prepared in accordance with any Federal, State and/or Local regulations</p>	<p>Section 5; Section 7.4</p>
<p>d. Plan addresses permits required to transport or disposal of recovered materials</p>	<p>Section 5; Section 7.4</p>
<p>20.0 Containment and Drainage Planning (Sec. 1.7.3)</p>	
<p>a. Description of containing/controlling a spill through drainage.</p>	<p>Appendix D; Appendix E</p>
<p>1. Containment volume</p>	<p>Appendix D; Appendix E</p>
<p>2. Drainage route from oil storage and transfer areas</p>	<p>Appendix E</p>
<p>3. Construction materials in drainage troughs</p>	<p>Appendix D; Appendix E</p>
<p>4. Type and number of valves and separators in drainage system</p>	<p>Appendix E</p>
<p>5. Sump pump capacities</p>	<p>Appendix E</p>
<p>6. Containment capacities of weirs and booms and their location</p>	<p>Section 7; Appendix E</p>
<p>7. Other clean up materials</p>	<p>Section 7</p>
<p>21.0 Self-Inspection, Training and Meeting Logs (Sec. 1.8)</p>	
<p>Facility Self-Inspection (Sec. 1.8.1)</p>	
<p>a. Records of tank inspections contained or cross-referenced in plan or maintained electronically</p>	<p>Appendix E</p>
<p>b. Records of secondary containment inspections contained or cross-referenced in plan or maintained electronically</p>	<p>Appendix E</p>
<p>c. Equipment Inspection Checklist</p>	<p>Appendix E</p>
<p>d. Response Equipment Checklist (Sec. 1.8.1.2)</p>	<p>Appendix A.2-4; Appendix A.2-5</p>
<p>1. Inventory (item and quantity)</p>	<p>Appendix A.2-4; Appendix A.2-5</p>

FIGURE F-1 - EPA CROSS-REFERENCE, CONTINUED

EPA OPA 90 REQUIREMENTS (40 CFR 112)	LOCATION IN THIS PLAN
Note: Section numbers indicated below correspond to sections in the model response plan in Appendix F of the Facility Response Plan (FRP) rule.	
2. Storage location	Appendix A.2-4; Appendix A.2-5
3. Accessibility (time to access and respond)	Appendix A.2-4; Appendix A.2-5
4. Operational status/condition	Appendix A.2-4; Appendix A.2-5
5. Actual use/testing (last test date and frequency of testing)	Appendix A.2-4; Appendix A.2-5
6. Shelf life (present age, expected replacement date)	Appendix A.2-4; Appendix A.2-5
e. Response Equipment Inspection Log	Figure A.2-4
1. Inspection records maintained for 5 years	Figure A.2-4
22.0 Facility Drills/Exercise (Sec. 1.8.2)	
a. Description of drill/exercise program based on PREP guidelines or other comparable program	Appendix A
1. QI notification drill	Appendix A
2. Emergency Management Team tabletop exercise	Appendix A
3. Equipment deployment exercise	Appendix A
4. Unannounced exercise	Appendix A
5. Area exercise	Appendix A
b. Description of evaluation procedures for drill program	Appendix A
c. Qualified Individual Notification Drill Log (Sec. 1.8.2.1) (Date, company, qualified individual, emergency scenario, evaluation)	Appendix A
d. Emergency Management Team Tabletop Drill Log (Sec. 1.8.2.2) (Date, company, qualified individual, emergency scenario,	Appendix A

evaluation, changes to be implemented, time table for implementation)	
23.0 Response Training (Sec. 1.8.3)	
a. Description of Response Training program (including topics)	Appendix A
b. Personnel Response Training Logs (Name, response training date/and number of hours; prevention training date/and number of hours)	Appendix A
c. Discharge Prevention Meeting Logs (Date, attendees)	Appendix E
24.0 Diagrams (Sec. 1.9)	
Site Plan Diagram	Figure 1-8
a. Entire facility to scale	Figure 1-8
b. Above and below-ground storage tanks	Figure 1-8
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FIGURE F-1 - EPA CROSS-REFERENCE, CONTINUED

EPA OPA 90 REQUIREMENTS (40 CFR 112)	LOCATION IN THIS PLAN
Note: Section numbers indicated below correspond to sections in the model response plan in Appendix F of the Facility Response Plan (FRP) rule.	
c. Contents and capacities of bulk oil storage tanks and drum oil storage areas	Figure 1-8; Appendix E
d. Process buildings	Figure 1-8; Appendix E
e. Transfer areas	Figure 1-8; Appendix E
f. Location and capacity of secondary containment systems	Figure 1-8; Appendix E
g. Location of hazardous materials	Figure 1-8; Appendix E
h. Location of communications and emergency response equipment	Figure 1-8; Appendix E
i. Location of electrical equipment that might contain oil	Figure 1-8; Appendix E

25.0 Site Drainage Plan Diagram	
a. Major sanitary and storm sewers, manholes and drains	Appendix E
b. Weirs and shut-off valves	Appendix E
c. Surface water receiving streams	Appendix E
d. Fire fighting water sources	Appendix E
e. Other utilities	Appendix E
f. Response personnel ingress and egress	Appendix E
g. Response equipment transportation routes	Appendix E
h. Direction of spill flow from discharge points	Appendix E
26.0 Site Evacuation Plan Diagram	
a. Evacuation routes	Figure 2.6-2
b. Location of regrouping areas	Figure 2.6-2
27.0 Site Security (Sec. 1.10)	
a. Description of facility security (Emergency cut-off locations, enclosures, guards and their duties, lighting, valve and pump locks, pipeline connection caps)	Appendix E under "Security"
28.0 Acronyms, Definitions and References	Appendix G
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FIGURE F-2 - USCG CROSS-REFERENCE

USCG OPA 90 REQUIREMENTS (33 CFR 154.1035)	LOCATION IN THIS PLAN
<i>a) Introduction and Plan Content</i>	
1. Facility Name and Location address, city, county, state, zip, phone number, fax number.	Figure 1-3
2. Facility Directions (including but not limited to maps, landmarks and river mile that could aid a responder and reviewer).	Section 1
3. Name, address and procedures for contacting the facility's	Figure 1-3; Figure 3.4-1

owner or operator on a 24 hour basis.	
4. Table of contents.	Foreword
5. Period when submitted plan does not have to conform to the subpart, a cross index, if appropriate.	Section 1.2
6. Record of change(s) to record information on plan updates.	Figure 1-1
b) Emergency Response Action Plan	
<p>1. Notification procedures</p> <ul style="list-style-type: none"> • Prioritized list of facility response personnel. • Federal, State or local agencies, as require • Spill response notification forms to Federal, State, local agencies. ?Form must state that initial notification must not be delayed by collection of data. • Notification of the National Response Center. 	Section 3
<p>2. Facility?s spill mitigation procedures</p> <ul style="list-style-type: none"> • Describe volume and oil groups that would be involved in the following: <ul style="list-style-type: none"> • Average, maximum and worse case discharge from the MTR facility. • Where applicable, the worst case discharge from the non-transportation-related facility. • Prioritized list of procedures and facility personnel (identified by job title).? Procedures must address actions to be taken in the event of a discharge, potential discharge or emergency involving the following equipment and scenarios: • Transfer equipment <ul style="list-style-type: none"> • Tank overfill or failure • Piping rupture, leak both under pressure and not under pressure • Explosion or fire • Equipment failure • Listing of equipment and the responsibilities of facility personnel to mitigate an average most probable discharge 	Section 2.1.1; Figure 2.1-2; Appendix D
3. Facility's response activities	
<p>i. Responsibilities of facility personnel to initiate a response? and supervise response resources pending arrival of qualified individuals.</p>	Section 2

FIGURE F-2 - USCG CROSS-REFERENCE, CONTINUED

USCG OPA 90 REQUIREMENTS (33 CFR 154.1035)	LOCATION IN THIS PLAN
ii. Responsibilities and authority of the qualified individual and alternate as required in ? 154.1026.	Section 4.5
iii. Apply the following organizational structure to manage response actions: <ul style="list-style-type: none"> • Command and control • Public information • Safety • Liaison with government agencies • Spill operations • Planning • Logistics support • Finance 	Section 4
iv. Identify oil spill removal organizations and the spill management teams to be capable of providing the following ? response resources: <ul style="list-style-type: none"> • Equipment and supplies to meet ? 154.1045, 154.1047, as appropriate • Trained personnel for response to be on hand for the first 7 days of the response • Job descriptions for each spill management team member within the organizational structure in a response action. 	Section 7; Appendix B
v. For mobile facilities in more than one COTP zone, oil spill removal organizations and the spill management teams must be identified from paragraph (3)(iv) and included in each COTP zone.	N/A
4. Sensitive areas	
i. Identify areas of economic importance and environmental sensitivities as identified in the ACP, which are potentially impacted by a worst case discharge.	Section 6
ii. For a worst case discharge the plan must address the following: <ul style="list-style-type: none"> • List all sensitive elements identified in ACP that are potentially impacted by a discharge. • Describe all response actions anticipated to protect sensitive elements. • Contain map or chart that depicts each 	Section 6; Appendix D.3

response action anticipated.	
<p>iii. Identify appropriate equipment and personnel as described in ? 154.1028 to protect sensitive elements by one of the following calculations:</p> <ul style="list-style-type: none"> • Persistent oils and non-petroleum oils discharged into non-tidal waters, the distance from the facility reached in 48 hours at maximum current. 	Section 7; Appendix B; Appendix E
<p>Brownsville Terminal Complex September 2004 © Technical Response Planning Corporation 2004</p>	

FIGURE F-2 - USCG CROSS-REFERENCE, CONTINUED

USCG OPA 90 REQUIREMENTS (33 CFR 154.1035)	LOCATION IN THIS PLAN
<ul style="list-style-type: none"> • Persistent and non-petroleum oils discharged into tidal waters, 15 miles from the facility down current during ebb tide and to the point of maximum tidal influence or 15 miles, whichever is less, during flood tide. • Non-persistent oils discharged into non-tidal waters, the distance from the facility reached in 24 hours at maximum current. • Non-persistent oils discharged into tidal waters, 5 miles from the facility down current during ebb tide and to the point of maximum tidal influence or 5 miles, whichever is less, during flood tide. • Spill trajectory or model maybe substituted if acceptable to COTP. • Procedures contained in the Environmental Protection Agency's regulations on oil pollution prevention may be substituted for non-tidal and tidal waters. • COTP may require additional sensitive elements to be protected depending on trajectory. 	Section 7; Appendix B; Appendix D
<p>5. Disposal plan Describe actions and procedures that adhere to Federal, state or local requirements.</p>	Section 5.5; Section 7.4
<i>c) Training and Exercises</i>	
<p>1. Training procedures of the facility owner or operator must meet requirements of ? 154.1050.</p>	Appendix A
<p>2. Drill procedures of the facility owner or operator must meet requirements of ? 154.1055.</p>	Appendix A

d) Plan Review and Update Procedures	
Plan review and update procedures of the facility owner or operator must meet requirements of ?154.1065 and any post-discharge review of the plan to evaluate and validate its effectiveness.	Section 1.2
e) Appendices	
1. Facility-specific information - principal characteristics	
i. There must be a physical description of the facility including a plan of the facility showing the mooring areas, transfer locations, control stations, locations of safety equipment, and the location and capacities of all piping and storage tanks.	Figure 1-3; Figure 1-8
ii. Identify sizes, types and number of vessels the facility can transfer oil to or from simultaneously.	Figure 1-3; Marine Transfer Manual
iii. Identify the first valve(s) on piping separating transportation-related and non-transportation-related areas. If piping serves tank vessels from a manifold it is considered the first valve.	Figure 1-8
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FIGURE F-2 - USCG CROSS-REFERENCE, CONTINUED

USCG OPA 90 REQUIREMENTS (33 CFR 154.1035)	LOCATION IN THIS PLAN
iv. The oil(s) and hazardous material handled, stored or transported in bulk must be documented and include the following: <ul style="list-style-type: none"> • Generic/chemical name • Description of appearance and odor • Hazards involved with handling or discharge • Firefighting procedures and extinguishing agents for oil/hazardous material 	Appendix D
2. List of contacts must include primary and alternate personnel, personnel from paragraph (b) (3) (iv), and Federal, state and local officials.	Section 3
3. Equipment list and records must include the following: <ul style="list-style-type: none"> • List of equipment and facility personnel required to respond to an average most probable discharge, as defined by ?154.1020 	Section 7; Appendix B

<p>List of equipment belonging to an oil spill removal organization as described in ?154.1028; unless the organization has been classified by the Coast Guard to equal or exceed the response capability needed by the facility</p> <ul style="list-style-type: none"> • When it is necessary for the appendix to contain a listing of response equipment, it shall include the following: <ul style="list-style-type: none"> ? skimmers; booms; dispersant application; in-situ burning; bioremediation equipment and supplies and other equipment used to apply other chemical agents on the NCP Product Schedule; communications, firefighting and beach cleaning equipment; boats and motors; and heavy equipment • This list must also include specifications for each piece of equipment as follows: <ol style="list-style-type: none"> 1. type, make, model and year of manufacture, 2. for oil recovery devices, the effective daily recovery rate, 3. for containment boom, the overall boom height and ? type of end connectors, 4. spill scenario in which the equipment will be used, 5. total daily capacity for storage and disposal of recovered daily oil 6. for communication equipment, the type and amount of equipment intended for use during response activities, 7. location of equipment, and 8. date of last inspection. 	
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FIGURE F-2 - USCG CROSS-REFERENCE, CONTINUED

USCG OPA 90 REQUIREMENTS (33 CFR 154.1035)	LOCATION IN THIS PLAN
4. Communications plan must describe the primary and alternate method of communication during discharges, including communications at the facility and at remote locations.	Section 7.2.3
5. Site specific safety and health plan must describe the safety and health plan to be implemented This appendix may reference another existing plan requiring under 29 CFR 1910.120	Section 5.3
6. List of acronyms and definitions must include all definitions that are critical to understanding the response plan.	Appendix G

FIGURE F-3 - DOT / RSPA CROSS-REFERENCE

OPA 90 REQUIREMENTS (49 CFR 194)	LOCATION
Information Summary	
<ul style="list-style-type: none"> For the core plan: 	
<ul style="list-style-type: none"> Name and address of operator 	Figure 1-3
<ul style="list-style-type: none"> For each Response Zone which contains one or more line sections that meet the criteria for determining significant and substantial harm (?194.103), listing and description of Response Zones, including county(s) and state(s) 	Figure 1-3
<ul style="list-style-type: none"> For each Response Zone appendix: 	
<ul style="list-style-type: none"> Information summary for core plan 	Section 1
<ul style="list-style-type: none"> QI names and telephone numbers, available on 24-hr basis 	Figure 1-3
<ul style="list-style-type: none"> Description of Response Zone, including county(s) and state(s) in which a worst case discharge could cause substantial harm to the environment 	Section 1
<ul style="list-style-type: none"> List of line sections contained in Response Zone, identified by milepost or survey station or other operator designation 	Figure 1-3
<ul style="list-style-type: none"> Basis for operator?s determination of significant and substantial harm 	Figure 1-3
<ul style="list-style-type: none"> The type of oil and volume of the worst case discharge 	Appendix D
<ul style="list-style-type: none"> Certification that the operator has obtained, through contract or other approved means, the necessary private personnel and equipment to respond, to the maximum extent practicable, to a worst case discharge or threat of such discharge 	Section 1.3; Appendix B
Notification Procedures	
<ul style="list-style-type: none"> Notification requirements that apply in each area of operation of pipelines covered by the plan, including applicable state or local requirements 	Section 3.0

<ul style="list-style-type: none"> • Checklist of notifications the operator or Qualified Individual is required to make under the response plan, listed in the order of priority 	Section 3.2
<ul style="list-style-type: none"> • Name of persons (individuals or organizations) to be notified of discharge, indicating whether notification is to be performed by operating personnel or other personnel 	Section 3.2; Figure 3.3-1
<ul style="list-style-type: none"> • Procedures for notifying Qualified Individuals 	Figure 3.2-1; Figure 4-1; Section 4.5
<ul style="list-style-type: none"> • Primary and secondary communication methods by which notifications can be made 	Section 7.2.3
<ul style="list-style-type: none"> • Information to be provided in the initial and each follow-up notification, including the following: <ul style="list-style-type: none"> • Name of pipeline • Time of discharge • Location of discharge • Name of oil recovered • Reason for discharge (e.g. material failure, excavation damage, corrosion) • Estimated volume of oil discharged • Weather conditions on scene • Actions taken or planned by persons on scene 	Figure 3.2-2

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FIGURE F-3 - DOT / RSPA CROSS-REFERENCE, CONTINUED

OPA 90 REQUIREMENTS (49 CFR 194)	LOCATION
Spill Detection and On-Scene Spill Mitigation Procedures	
<ul style="list-style-type: none"> • Methods of initial discharge detection 	Appendix D.1
<ul style="list-style-type: none"> • Procedures, listed in order of priority, that personnel are required to follow in responding to a pipeline emergency to mitigate or prevent any discharge from the pipeline 	Section 2
<ul style="list-style-type: none"> • List of equipment that may be needed in response activities based on land and navigable waters including: <ul style="list-style-type: none"> • Transfer hoses and pumps • Portable pumps and ancillary equipment • Facilities available to transport and receive oil from a leaking pipeline 	Section 7.1.1; Appendix B
<ul style="list-style-type: none"> • Identification of the availability, location, and contact phone numbers to obtain equipment for response activities on a 24-hour basis 	Figure 3.4-1; Appendix B

<ul style="list-style-type: none"> • Identification of personnel and their location, telephone numbers, and responsibilities for use of equipment in response activities on a 24-hour basis 	Figure 3.4-1; Appendix B
Response Activities	
<ul style="list-style-type: none"> • Responsibilities of, and actions to be taken by, operating personnel to initiate and supervise response actions pending the arrival of the Qualified Individual or other response resources identified in the response plan 	Section 2; Section 4.1; Appendix B
<ul style="list-style-type: none"> • Qualified Individual's responsibilities and authority, including notification of the response resources identified in the response plan 	Section 4.5
<ul style="list-style-type: none"> • Procedures for coordinating the actions of the operator or Qualified Individual with the action of the OSC responsible for monitoring or directing those actions 	Section 4.4; Section 4.5
<ul style="list-style-type: none"> • Oil spill response organizations (OSRO) available through contract or other approved means, to respond to a worst case discharge to the maximum extent practicable 	Appendix B
<ul style="list-style-type: none"> • For each organization identified under paragraph (d), a listing of: <ul style="list-style-type: none"> • Equipment and supplies available • Trained personnel necessary to continue operation of the equipment and staff the oil spill removal organization for the first seven days of the response 	Appendix B
List of Contacts	
<ul style="list-style-type: none"> • List of persons the Plan requires the operator to contact 	Figure 3.2-1
<ul style="list-style-type: none"> • Qualified individuals for the operator's areas of operation 	Figure 1.3
<ul style="list-style-type: none"> • Applicable insurance representatives or surveyors for the operator's areas of operation 	Figure 3.4-1
<ul style="list-style-type: none"> • Persons or organizations to notify for activation of response resources 	Figure 3.4-1
Training Procedures	
<ul style="list-style-type: none"> • Description of training procedures and programs of the operations 	Appendix A.2

FIGURE F-3 - DOT / RSPA CROSS-REFERENCE, CONTINUED

OPA 90 REQUIREMENTS (49 CFR 194)	LOCATION
Drill Procedures	
<ul style="list-style-type: none"> Announced and unannounced drills 	Appendix A.1
<ul style="list-style-type: none"> Types of drills and their frequencies; for example: <ul style="list-style-type: none"> Manned pipeline emergency procedures and qualified individual notification drills conducted quarterly Drills involving emergency actions by assigned operating or maintenance personnel and notification of qualified individual on pipeline facilities which are normally unmanned, conducted quarterly Shore-based Spill Management Team (SMT) tabletop drills conducted yearly Oil spill removal organization field equipment deployment drills conducted yearly A drill that exercises entire response plan for each Response Zone, would be conducted at least once every three years 	Appendix A.1
Response Plan review and update procedures	
<ul style="list-style-type: none"> Procedures to meet ?194.121 	Section 1.2
<ul style="list-style-type: none"> Procedures to review plan after a worst case discharge and to evaluate and record the plan?s effectiveness 	Section 1.2; Appendix D
Response zone appendices	
Each response zone appendix would provide the following information:	
<ul style="list-style-type: none"> Name and telephone number of the qualified individual 	Figure 1-3; Figure 3.4-1
<ul style="list-style-type: none"> Notification procedures 	Section 3
<ul style="list-style-type: none"> Spill detection and mitigation procedures 	Section 2.1; Appendix D
<ul style="list-style-type: none"> Name, address, and telephone number of oil spill response organization 	Figure 3.4-1; Appendix B
<ul style="list-style-type: none"> Response activities and response resources including: <ul style="list-style-type: none"> Equipment and supplies necessary to meet ?194.115 Trained personnel necessary to sustain operation of the equipment and to staff the oil spill response organization and spill management team for the first seven days of the response 	Appendix A; Appendix B
<ul style="list-style-type: none"> Names and telephone numbers of federal, state, and local agencies which the operator expects to assume pollution response responsibilities 	Figure 3.4-1

<ul style="list-style-type: none"> Worst case discharge volume 	Appendix D
<ul style="list-style-type: none"> Method used to determine the worst case discharge volume, with calculations 	Appendix D
<ul style="list-style-type: none"> A map that clearly shows: <ul style="list-style-type: none"> Location of worst case discharge Distance between each line section in the Response Zone: <ul style="list-style-type: none"> Each potentially affected public drinking water intake, lake, river, and stream within a radius of five miles of the line section Each potentially affected environmentally sensitive area within a radius of one mile of the line section 	Section 6

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FIGURE F-3 - DOT / RSPA CROSS-REFERENCE, CONTINUED

OPA 90 REQUIREMENTS (49 CFR 194)	LOCATION
Response zone appendices, continued	
<ul style="list-style-type: none"> Piping diagram and plan-profile drawing of each line section; may be kept separate from the response plan if the location is identified 	Figure 1-3; Figure 1-4; Figure 1-5
<ul style="list-style-type: none"> For every oil transported by each pipeline in the response zone, emergency response data that: <ul style="list-style-type: none"> Include name, description, physical and chemical characteristics, health and safety hazards, and initial spill-handling and firefighting methods Meet 29 CFR 1910.1200 or 49 CFR 172.602 	Appendix C

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FIGURE F-4 - OSHA CROSS-REFERENCE

EAP REQUIREMENTS (29 CFR 1910.38 [a] [2])	LOCATION
<ul style="list-style-type: none"> Emergency escape procedures and emergency escape route assignments 	Section 2.6
<ul style="list-style-type: none"> Procedures to be followed by employees who remain to operate critical plant operations before they evacuate 	Section 2.6
<ul style="list-style-type: none"> Procedures to account for all employees after emergency evacuation has been completed 	Section 2.6

<ul style="list-style-type: none"> Rescue and medical duties for those employees who are to perform them 	Section 2.6
<ul style="list-style-type: none"> The preferred means of reporting fires and other emergencies 	Figure 3.2-1
<ul style="list-style-type: none"> Names of regular job titles of persons or departments who can be contacted for further information or explanation of duties under the plan 	Figure 3.4-3

ERP REQUIREMENTS (29 CFR 1910.120 [I] [2])	LOCATION
<ul style="list-style-type: none"> Pre-emergency planning 	Section 2; Appendix D; Appendix E
<ul style="list-style-type: none"> Personnel roles, lines of authority, and communication 	Section 4.4; Section 7.1.6
<ul style="list-style-type: none"> Emergency recognition and prevention 	Section 2; Appendix D; Appendix E
<ul style="list-style-type: none"> Safe distances and places of refuge 	Section 2.6
<ul style="list-style-type: none"> Site security and control 	Section 5.6; Section 7.3
<ul style="list-style-type: none"> Decontamination procedures which are not covered by the site safety and health plan 	Section 5.4
<ul style="list-style-type: none"> Emergency medical treatment and first aid 	Section 2.3
<ul style="list-style-type: none"> Emergency alerting and response procedures 	Section 2
<ul style="list-style-type: none"> Critique of response and follow-up 	Section 8.4
<ul style="list-style-type: none"> PPE and emergency equipment 	Appendix B

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FIGURE F-5 - EPA / SPCC CROSS-REFERENCE

EPA SPCC REQUIREMENTS (40 CFR 112.7 and 112.8)	LOCATION
112.7 General requirements for Spill Prevention, Control, and Countermeasure Plans	
a. General requirements	
<ol style="list-style-type: none"> 1. Include a discussion of your facility's conformance with the requirements listed in this part 	Appendix E
<ol style="list-style-type: none"> 3. Describe in your Plan the physical layout of the facility 	Figure 1-8

and include a facility diagram	
i. The type of oil in each container and its storage capacity	Figure D-1
ii. Discharge prevention measures	Section 2; Appendix E
iii. Discharge or drainage controls	Appendix E
iv. Countermeasures for discharge	Section 2
v. Methods of disposal	Section 7
vi. Contact list and phone numbers	Section 3
4. Unless you have submitted a response plan, provide information and procedures to report a discharge	Section 3
5. Unless you have submitted a response plan, describe procedures you will use when a discharge occurs	Section 2
b. Prediction of the direction, rate of flow, and total quantity of oil which could be discharged from the facility as a result of each type of major equipment failure	Section 2; Appendix D
c. Provide appropriate containment	Figure D-1
d. If you determine that the installation of any of the structures or pieces of equipment is not practicable, you must clearly explain in your Plan why such measures are not practicable; for bulk storage containers, conduct both periodic integrity testing of the containers and periodic integrity and leak testing of the valves and piping; and, unless you have submitted a response plan under § 112.20, provide in your Plan the following:	Appendix E
1. An oil spill contingency plan following the provisions of part 109 of this chapter	Section 2
2. A written commitment of manpower, equipment, and materials	Section 1.3
e. Inspections, tests, and records	Appendix E
f. Personnel, training, and discharge prevention procedures	Appendix E
1. Oil-handling personnel training	Appendix E
2. Person accountable for discharge prevention	Appendix E

3. Schedule and conduct discharge prevention briefings	Appendix E
g. Security (excluding oil production facilities)	Appendix E
1. Facility fencing	Appendix E
2. Master flow, drain valves, and other valves remain in closed position	Appendix E
3. Lock the starter control on each oil pump in "off" position	Appendix E
4. Securely cap or blank-flange the loading/unloading connections	Appendix E

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FIGURE F-5 - EPA / SPCC CROSS-REFERENCE, CONTINUED

EPA SPCC REQUIREMENTS (40 CFR 112.7 and 112.8)	LOCATION
112.7 General requirements for Spill Prevention, Control, and Countermeasure Plans, continued	
5. Provide facility lighting	Appendix E
i. Discovery of discharges occurring during hours of darkness	Appendix E
ii. Prevention of discharges occurring through acts of vandalism	Appendix E
h. Facility tank car and tank truck loading/unloading rack (excluding offshore facilities)	Appendix E
1. Catchment basin, treatment facility, or quick drainage system	Appendix E
2. Provide vehicular disconnect warning system	Appendix E
3. Inspect for discharges of the lower most drain	Appendix E
i. Aboveground container brittle fracture evaluation	Appendix E
j. Discussion of conformance with the applicable requirements	Appendix E
k. Qualified Oil-filled Operational Equipment	Appendix E

1. Qualification Criteria - Reportable Discharge History	Appendix E
2. Alternative Requirements to General Secondary Containment	Appendix E
i. Establish and document the facility procedures for inspections or a monitoring program to detect equipment failure and/or a discharge; and	Appendix E
ii. Unless you have submitted a response plan under ? 112.20, provide in your Plan the following:	Appendix E
A. An oil spill contingency plan following the provisions of part 109 of this chapter	<u>Figure C-3</u>
B. A written commitment of manpower, equipment, and materials required to expeditiously control and remove any quantity of oil discharged that may be harmful	<u>Figure C-3</u>
112.8 Spill Prevention, Control, and Countermeasure Plan requirements for onshore facilities (excluding production facilities)	
b. Facility drainage	Appendix E
1. Restrain drainage from diked storage areas except where facility systems are designed to control such discharge	Appendix E
2. Use valves of manual, open-and-closed design, for the drainage of diked areas	Appendix E
3. Design facility drainage systems from undiked areas with a potential for a discharge to flow into ponds, lagoons, or catchment basins designed to retain oil or return it to the facility	Appendix E
4. Equip the final discharge of all ditches inside the facility with a diversion system that would, in the event of an uncontrolled discharge, retain oil in the facility	Appendix E
5. Where drainage waters are treated in more than one treatment unit and such treatment is continuous, and pump transfer is needed, provide two "lift" pumps and permanently install at least one of the pumps	Appendix E
c. Bulk storage containers	Appendix E

FIGURE F-5 - EPA / SPCC CROSS-REFERENCE, CONTINUED

EPA SPCC REQUIREMENTS (40 CFR 112.7 and 112.8)	LOCATION
112.8 Spill Prevention, Control, and Countermeasure Plan requirements for onshore facilities (excluding production facilities), continued	
1. Not use a container for the storage of oil unless its material and construction are compatible with the material stored and conditions of storage such as pressure and temperature	Appendix E
2. Provide a secondary means of containment for the entire capacity of the largest single container and sufficient freeboard to contain precipitation	Appendix E
3. Not allow drainage of uncontaminated rainwater from the diked area into a storm drain or discharge of an effluent into an open watercourse, lake, or pond, bypassing the facility treatment system unless you:	Appendix E
i. Normally keep the bypass valve sealed closed	Appendix E
ii. Inspect the retained rainwater to ensure that its presence will not cause a discharge as described in § 112.1(b)	Appendix E
iii. Open the bypass valve and reseal it following drainage under responsible supervision; and	Appendix E
iv. Keep adequate records of such events, for example, any records required under permits issued in accordance with §§ 122.41(j)(2) and 122.41(m)(3) of this chapter	Appendix E
4. Protect completely buried metallic storage tanks from corrosion	Appendix E
5. Protect partially buried and bunkered tanks from corrosion	Appendix E
6. Test each aboveground container for integrity on a regular schedule	Appendix E
7. Control leakage through defective internal heating coils	Appendix E
8. Engineer or update each container installation in accordance with good engineering practice to avoid	Appendix E

discharges. You must provide at least one of the following devices:	
i. High liquid level alarms with an audible or visual signal	Appendix E
ii. High liquid level pump cutoff devices	Appendix E
iii. Direct audible or code signal communication between the container gauger and the pumping station	Appendix E
iv. A fast response system	Appendix E
v. Regularly test liquid level sensing devices to ensure proper operation	Appendix E
9. Observe effluent treatment facilities frequently enough to detect possible system upsets that could cause a discharge as described in § 112.1(b)	Appendix E
10. Promptly correct visible discharges which result in a loss of oil from the container	Appendix E
11. Position or locate mobile or portable oil storage containers to prevent a discharge	Appendix E

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FIGURE F-5 - EPA / SPCC CROSS-REFERENCE, CONTINUED

EPA SPCC REQUIREMENTS (40 CFR 112.7 and 112.8)	LOCATION
112.8 Spill Prevention, Control, and Countermeasure Plan requirements for onshore facilities (excluding production facilities), continued	
d. Facility transfer operations, pumping, and facility process	Appendix E
1. Provide protection of buried piping that is installed or replaced on or after August 16, 2002	Appendix E
2. Cap or blank-flange the terminal connection at the transfer point	Appendix E
3. Properly design pipe supports to minimize abrasion and corrosion and allow for expansion and contraction	Appendix E
4. Regularly inspect all aboveground valves, piping, and	Appendix E

appurtenances	
5. Warn all vehicles entering the facility to be sure that no vehicle will endanger aboveground piping or other oil transfer operations	Appendix E

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F.1 RESPONSE PLAN COVER SHEET

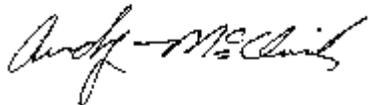
F.1.1 General Information

Owner/Operator:	TransMontaigne Operating Co. L.P. 200 Mansell Court East, Suite 600 Roswell, GA 30076
Facility Name:	Brownsville Terminal Complex
Facility Mailing Address:	10150 State Highway 48 (Main Office) Brownsville, Texas 78521
Facility Telephone/Fax:	(956) 831-3531/ (956) 831-0448
Facility Latitude/Longitude:	(b) (7)(F)
Dunn and Bradstreet:	08-662-6678
North American Industrial Classification System (NAICS) Code:	49319 (SIC 4226)
Largest Oil Storage Tank Capacity:	5067
Maximum Oil Storage Capacity:	2391969
Number of Oil Storage Tanks:	107
Worst Case Discharge Amount:	(b) (7)(F)
Facility Distance to Navigable Waters:	0-1/4

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F.1.2 Applicability of Substantial Harm / Certification

Brownsville Terminal Complex

FACILITY DISTANCE TO NAVIGABLE WATER, MARK THE APPROPRIATE LINE	
0-1/4 <input checked="" type="checkbox"/>	1/4-1/2 mile <input type="checkbox"/> 1 mile <input type="checkbox"/> > 1 mile <input type="checkbox"/>
APPLICABILITY OF SUBSTANTIAL HARM CRITERIA	
Does the facility transfer oil over-water to or from vessels and does the facility have a total oil storage capacity greater than or equal to 42,000 gallons?	
YES <input checked="" type="checkbox"/>	NO <input type="checkbox"/>
Does the facility have a total oil storage capacity greater than or equal to 1 million gallons and, within any storage area, does the facility lack secondary containment that is sufficiently large to contain the capacity of the largest aboveground oil storage tank plus sufficient freeboard to allow for precipitation?	
YES <input type="checkbox"/>	NO <input checked="" type="checkbox"/>
Does the facility have a total oil storage capacity greater than or equal to 1 million gallons and is the facility located at a distance (as calculated using the appropriate formula in Appendix C or a comparable formula) such that a discharge from the facility could cause injury to fish and wildlife and sensitive environments?	
YES <input checked="" type="checkbox"/>	NO <input type="checkbox"/>
Does the facility have a total oil storage capacity greater than or equal to 1 million gallons and is the facility located at a distance (using the appropriate formula in Appendix C or a comparable formula) such that a discharge from the facility would shut down a drinking water intake?	
YES <input type="checkbox"/>	NO <input checked="" type="checkbox"/>
Does the facility have a total oil storage capacity greater than or equal to 1 million gallons and has the facility experienced a reportable oil spill in an amount greater than or equal to 10,000 gallons within the last 5 years?	
YES <input type="checkbox"/>	NO <input checked="" type="checkbox"/>
CERTIFICATION	
I certify under penalty of law that I have personally examined and am familiar with the information submitted in this document and that based on my inquiry of those individuals responsible for obtaining information, I believe that the submitted information is true, accurate and complete.	
Signature: 	Date: September 28, 2004
Name: Andy McClish	Title: Manager, Regulatory Compliance

APPENDIX G

ACRONYMS AND DEFINITIONS

G.1 Acronyms

G.2 Definitions

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G.1 ACRONYMS

ACP	Area Contingency Plan
ANPRM	Advanced Notice of Proposed Rulemaking
BLM	Bureau of Land Management
CERCLA	Comprehensive Environmental Response, Compensation and Liability Act of 1980, as amended
CFR	Code of Federal Regulations
COTP	Captain of the Port (USCG)
CRZ	Contamination Reduction Zone
CWA	Clean Water Act (Federal)
EOC	Emergency Operations Center
EPA	U. S. Environmental Protection Agency
EPCRA	Emergency Planning and Community Right-to-Know
ERT	Emergency Response Team
ESOH	Environmental, Safety and Occupational Health
FAA	Federal Aviation Administration
FEMA	Federal Emergency Management Agency
FOSC	Federal On-Scene Coordinator
FRT	Facility Response Team
FWPCA	Federal Water Pollution Control Act
GIS	Geographic Information System
HMIS	Hazardous Material Information System
IC	Incident Commander
ICS	Incident Command System
IMT	Incident Management Team
IRT	Incident Response Team (Local Personnel)
LEPC	Local Emergency Planning Commission
LOSC	Local On-Scene Coordinator
MSDS	Material Safety Data Sheets
MSO	Marine Safety Office (USCG)
MSRC	Marine Spill Response Corporation
MTR	Marine Transportation Related
NCP	National Contingency Plan
NIIMS	National Interagency Incident Management System

NM	Nautical Miles
NOAA	National Oceanic and Atmospheric Administration
NRC	National Response Center (USCG)
NRDA	Natural Resource Damage Assessment

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NRT	National Response Team
OPA 90	Oil Pollution Act of 1990
OSC	On-Scene Coordinator
OSHA	Occupational Safety and Health Administration
PPE	Personal Protective Equipment
PREP	Preparedness or Response Exercise Program
QI	Qualified Individual
RCRA	Resource Conservation and Recovery Act of 1976
RRT	Regional Response Team (Federal)
RQ	Reportable Quantity
SARA	Superfund Amendments and Reauthorization Act
SERC	State Emergency Response Commission
SMT	Spill Management Team
SOSC	State On-Scene Coordinator
SPCC	Spill Prevention Control and Countermeasures
SSC	Scientific Support Coordinator (NOAA)
USACOE	U. S. Army Corps. of Engineers
USCG	U. S. Coast Guard
USDOD	U. S. Department of Defense
USDL	U. S. Department of Labor
USDOE	U. S. Department of Energy
USDOI	U. S. Department of the Interior
USDOJ	U. S. Department of Justice
USDOT	U. S. Department of Transportation
USFWS	U. S. Department of Wildlife Service (USDOI)
USGS	U. S. Geological Survey (USDOI)

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G.2 DEFINITIONS

Adverse Weather

The weather conditions that will be considered when identifying response systems and equipment in response plan for the applicable operating environment. Factors to consider include wave height, precipitation, ice, temperature, weather-related visibility and currents in areas where the systems or equipment are intended to function.

Average Most Probable Discharge

A discharge of the lesser of 50 barrels or 1 percent of the volume of the Worst Case Discharge.

Barrel

Measure of space occupied by 42 U. S. Gallons at 60 degrees Fahrenheit.

Captain of the Port Zone (COTP)

A port-specific zone specified in 33 CFR Part 3 and the seaward extension of that zone to the outer boundary of the exclusive economic zone (EEZ).

Command Post

A site located at a safe distance from the spill site where response decisions are made, equipment and manpower deployed and communications handled. The Incident Commander and the On-Scene Coordinators typically direct the on-scene response from this location.

Communication Equipment

Equipment that will be utilized during response operations to maintain communication between employees, contractors and Federal/State/Local agencies.

Containment Boom

A flotation/freeboard device, made with a skirt/curtain, longitudinal strength member and ballast unit/weight designed to entrap and contain spilled product for on-water recovery.

Contingency Plan

A document used by: (1) Federal, State and Local agencies to guide planning and response procedures regarding spills of oil, hazardous substances or other emergencies; (2) a document used by industry as a Response Plan to spills of oil, hazardous substances or other emergencies occurring upon their vessels or at their facilities.

Contract or Other Approved:

Includes:

- A written contractual agreement with a response contractor. The agreement should identify and ensure the availability of the specified personnel and equipment described under applicable regulations within stipulated response times in the specified geographic areas.
- Certification by the facility owner or operator that the specified personnel and equipment described under applicable regulations are owned, operated or under the direct control of the facility owner or operator and are available within stipulated times in the specified geographic areas.

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- Active membership in the local or regional Oil Spill Removal Organization that has identified specified personnel and equipment described under USCG regulations that are

available to respond to a discharge within stipulated times in the specified geographic areas.

- A document which--
 - Identifies the personnel, equipment and/or services capable of being provided by the response contractor within stipulated response times in specified geographic areas.
 - Sets out the parties' acknowledgment that the response contractor intends to commit the resources in the event of a response.
 - Permits regulatory agencies to verify the availability of the response resources identified through tests, inspections and drills.
 - Is incorporated by reference in the Response Plan.

For a facility that could reasonably be expected to cause substantial harm to the environment, with the consent of the response contractor or Oil Spill Removal Organization, the identification of a response contractor or Oil Spill Removal Organization with specified equipment and personnel which are available within stipulated response times in specific geographic areas.

Dispersants

Those chemical agents that emulsify, disperse or solubilize oil into the water column or promote the surface spreading of oil slicks to facilitate dispersal of the oil into the water column.

Diversion Boom

A flotation/freeboard device, made with a skirt/curtain, longitudinal strength member and ballast unit/weight designed to deflect or divert floating product towards a pick up point or away from certain areas.

Environmentally Sensitive Area:

Streams and water bodies, aquifer recharge zones, springs, wetlands, agricultural areas, bird rookeries, endangered or threatened species (flora and fauna) habitat, wildlife preserves or conservation areas, parks, beaches, dunes or any other area protected or managed for its natural resource value.

Exclusive Economic Zone (EEZ)

The zone contiguous to the territorial sea of the United States extending to a distance up to 200 nautical miles from the baseline from which the breadth of the territorial sea is measured.

Federal Fund

The oil spill liability trust fund established under OPA.

First Responders, First Response Agency

A public health or safety agency (i.e., fire service or police department) charged with responding to a spill during the emergency phase and alleviating immediate danger to human life, health, safety or property.

Hazardous Material

Any nonradioactive solid, liquid or gaseous substance which, when uncontrolled, may be harmful to humans, animals or the environment. Including but not limited to substances otherwise defined as hazardous wastes, dangerous wastes, extremely hazardous wastes, oil or pollutants.

Hazardous Substance

Any substance designated as such by the Administrator of the EPA pursuant to the Comprehensive Environmental Response, Compensation and Liability Act; regulated pursuant to Section 311 of the Federal Water Pollution Control Act.

Hazardous Waste

Any solid waste identified or listed as a hazardous waste by the Administrator of the EPA pursuant to the federal **Solid Waste Disposal Act**, as amended by the **Resources Conservation and Recovery Act (RCRA)**, 42 U.S.C., Section 6901, et seq. as amended. The EPA Administrator has identified the characteristics of hazardous wastes and listed certain wastes as hazardous in Title 40 of the **Code of Federal Regulations**, Part 261, Subparts C and D respectively.

Higher Volume Port Area

Ports of:

- Boston, MA
- New York, NY
- Delaware Bay and River to Philadelphia, PA
- St. Croix, VI
- Pascagoula, MS
- Mississippi River from Southwest Pass, LA to Baton Rouge, LA
- Louisiana Offshore Oil Port (LOOP), LA
- Lake Charles, LA
- Sabine-Neches River, TX
- Galveston Bay and Houston Ship Channel, TX
- Corpus Christi, TX
- Los Angeles/Long Beach Harbor, CA
- San Francisco Bay, San Pablo Bay, Carquinez
- Strait, Suisun Bay to Antioch, CA
- Straits of Juan de Fuca and Puget Sound, WA
- Prince William Sound, AK

Incident Commander (IC)

The one individual in charge at any given time of an incident. The Incident Commander will be responsible for establishing a Unified Command with all On-Scene Coordinators.

Incident Command System

A method by which the response to an extra-ordinary event, including a spill, is categorized into functional components and responsibility for each component assigned to the appropriate individual or agency.

Inland Area

The area shoreward of the boundary lines defined in 46 CFR Part 7, except in the Gulf of Mexico. In the Gulf of Mexico, it means the area shoreward of the lines of demarcations (COLREG lines) defined in §80.740 - §80.850 of Title 33 of the CFR. The inland area does not include the Great Lakes.



Interim Storage Site

A site used to temporarily store recovered oil or oily waste until the recovered oil or oily waste is disposed of at a permanent disposal site. Interim storage sites include trucks, barges and other vehicles used to store waste until transport begins.

Lead Federal Agency

The agency which coordinates the federal response to incidents. The lead Federal agencies are:

- U. S. Coast Guard (USCG): Oil and chemically hazardous materials incidents on navigable waters
- Environmental Protection Agency (EPA): Oil and chemically hazardous materials incidents on most inland waters and in the inland zone

Lead State Agency

The agency which coordinates state support to Federal and/or Local governments or assumes the lead in the absence of Federal response.

Marine Transportation Related Facility (MTR Facility)

A facility, including piping and any structure used to transfer oil to or from a vessel, subject to regulation under 33 CFR Part 154 and any deepwater port subject to regulation under 33 CFR Part 150.

Maximum Most Probable Discharge

A discharge of the lesser of 1,200 barrels or 10 percent of the volume of a Worst Case Discharge.

National Contingency Plan

The Plan prepared under the Federal Water Pollution Control Act (33 United State Code §1321 et seq.) and the Comprehensive Environmental Response, Compensation and Liability Act of 1980 (42 United State Code §9601 et seq.), as revised from time to time.

Nearshore Area

The area extending seaward 12 miles from the boundary lines defined in 46 CFR Part 7, except in the Gulf of Mexico. In the Gulf of Mexico, it means the area extending seaward 12 miles from the line of demarcation (COLREG) lines defined in §80.740 - §80.850 of Title 33 of the CFR.

Non-Persistent or Group I Oil

A petroleum-based oil that, at the time of shipment, consists of hydrocarbon fractions --

- (1) At least 50% of which by volume, distill at a temperature of 340°C (645°F); and
- (2) At least 95% of which volume, distill at a temperature of 370°C (700°F).

Non-Petroleum Oil

Oil of any kind that is not petroleum based. It includes, but is not limited to, animal and vegetable oils.

Offshore Area

The area beyond 12 nautical miles measured from the boundary lines defined in 46 CFR Part 7

extending seaward to 50 nautical miles, except in the Gulf of Mexico. In the Gulf of Mexico it is the area beyond 12 nautical miles of the line of demarcation (COLREG lines) defined in §80.740 - §80.850 of Title 33 of the CFR extending seaward to 50 nautical miles.

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Oil or Oils

Naturally occurring liquid hydrocarbons at atmospheric temperature and pressure coming from the earth, including condensate and natural gasoline and any fractionation thereof, including, but not limited to, crude oil, petroleum gasoline, fuel oil, diesel oil, oil sludge, oil refuse and oil mixed with wastes other than dredged spoil. Oil does not include any substance listed in Table 302.4 of 40 CFR Part 302 adopted August 14, 1989, under Section 101(14) of the Federal Comprehensive Environmental Response, Compensation and Liability Act of 1980, as amended by P.L. 99-499.

Oil Spill Removal Organization (OSRO)

See definition for Primary Response Contractors

Operating Area

The rivers and canals, inland, nearshore, Great Lakes or offshore geographic locations in which a facility is handling, storing or transporting oil.

Operating Environment

Rivers and canals, inland, Great Lakes or ocean. These terms are used to define the conditions in which response equipment is designed to function.

Owner or Operator

Any person, individual, partnership, corporation, association, governmental unit or public or private organization of any character.

Persistent Oil

A petroleum based oil that does not meet the distillation criteria for a non-persistent oil. For the purposes of this Appendix, persistent oils are further classified based on specific gravity as follows:

1. Group II - specific gravity less than .85.
2. Group III - specific gravity between .85 and less than .95.
3. Group IV - specific gravity .95 to and including 1.0.
4. Group V - specific gravity greater than 1.0.

Primary Response Contractors or Contractors

An individual, company or cooperative that has contracted directly with the Plan holder to provide equipment and/or personnel for the containment or cleanup of spilled oil.

Qualified Individual(s)

An English-speaking representative(s) of the Facility identified in the Plan, located in the United States, available on a 24-hour basis, familiar with implementation of the Facility Response Plan and trained in his or her responsibilities under the Plan. This person must have full written authority to implement the Facility's Response Plan. This includes:

- Activating and engaging in contracting with identified Oil Spill Removal Organization(s)
- Acting as a liaison with the predesigned Federal On-Scene Coordinator (FOSC)
- Obligating, either directly or through prearranged contracts, funds required to carry out all necessary or directed response activities

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Regional Response Team

The Federal response organization (consisting of representatives from selected Federal and State agencies) which acts as a regional body responsible for planning and preparedness before an oil spill occurs and providing advice to the FOSC in the event of a major or substantial spill.

Responsible Party

Any person, owner/operator or facility that has control over an oil or hazardous substance immediately before entry of the oil or hazardous substance into the atmosphere or in or upon the water, surface or subsurface land of the State.

Rivers and Canals

A body of water confined within the inland area that has a projected depth of 12 feet or less, including the Intracoastal Waterway and other waterways artificially created for navigation.

Skimmers

Mechanical devices used to skim the surface of the water and recover floating oil. Skimmers fall into four basic categories (suction heads, floating weirs, oleophilic surface units and hydrodynamic devices) which vary in efficiency depending on the type of oil and size of spill.

Sorbents

Materials ranging from natural products to synthetic polymeric foams placed in confined areas to soak up small quantities of oil. Sorbents are very effective in protecting walkways, boat decks, working areas and previously uncontaminated or cleaned areas.

Spill Management Team

The personnel identified to staff the organizational structure identified in a Response Plan to manage Response Plan implementation.

Staging Areas

Designated areas near the spill site for gathering and deploying equipment and/or personnel.

State Emergency Response Commission (SERC)

A group of officials appointed by the Governor to implement the provision of Title III of the Federal Superfund Amendments and Reauthorization Act of 1986 (SARA). The SERC approves the State Oil and Hazardous Substance Discharge Prevention and Contingency Plan and Local Emergency Response Plans.

Unified Command

The method by which Local, State and Federal agencies and the Responsible Party will work together to:

- Determine their roles and responsibilities for a given incident
- Determine their overall objectives for management of an incident
 - Select a strategy to achieve agreed upon objectives
 - Deploy resources to achieve agreed-upon objective

Brownsville Terminal Complex September 2004

© Technical Response Planning
Corporation 2004

Waste

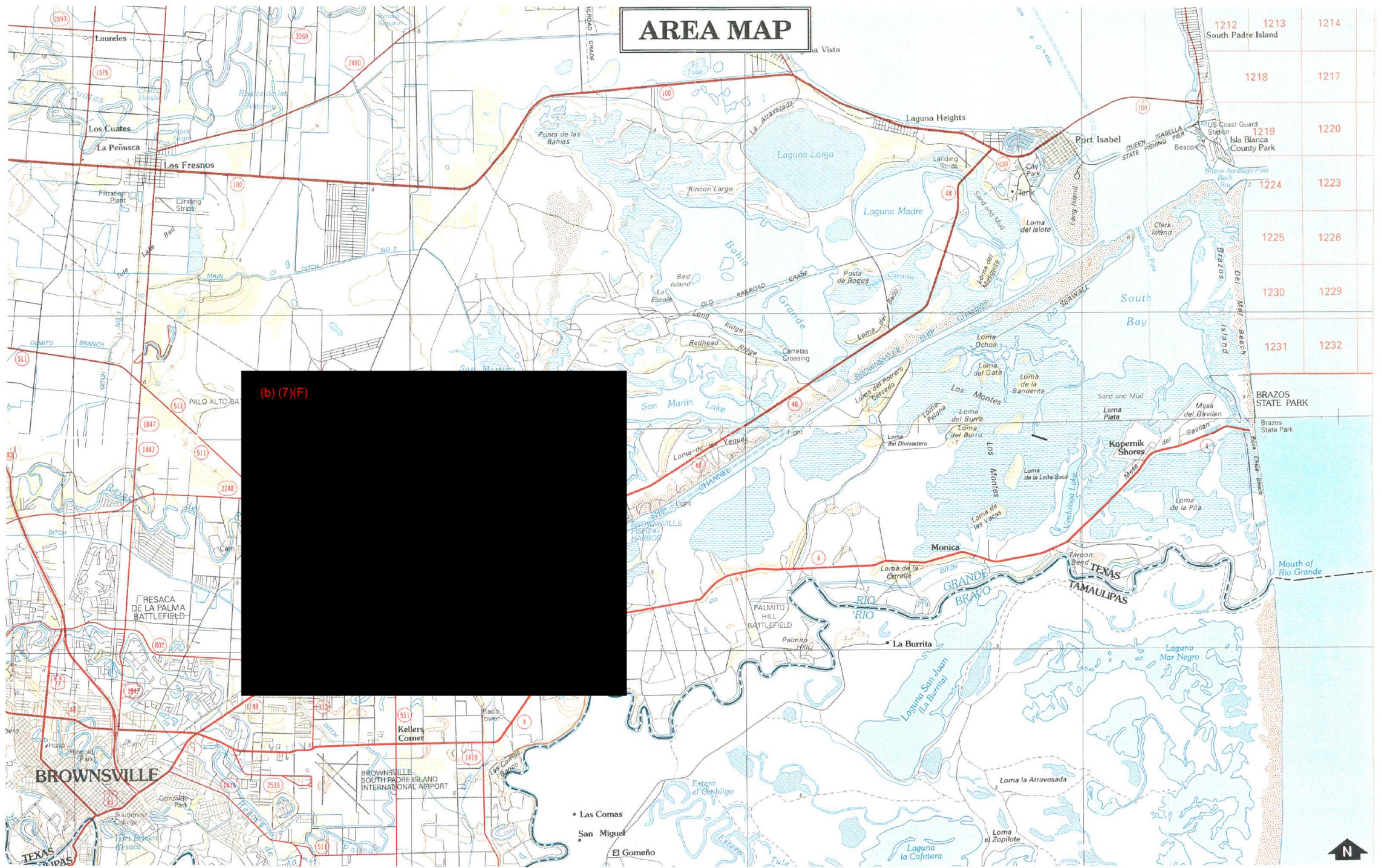
Oil or contaminated soil, debris and other substances removed from coastal waters and adjacent waters, shorelines, estuaries, tidal flats, beaches or marshes in response to an unauthorized discharge. Waste means any solid, liquid or other material intended to be disposed of or discarded and generated as a result of an unauthorized discharge of oil. Waste does not include substance intended to be recycled if they are in fact recycled within 90 days of their generation or if they are brought to a recycling facility within that time.

Wildlife Rescue

Efforts made in conjunction with Federal and State agencies to retrieve, clean and rehabilitate birds and wildlife affected by an oil spill.

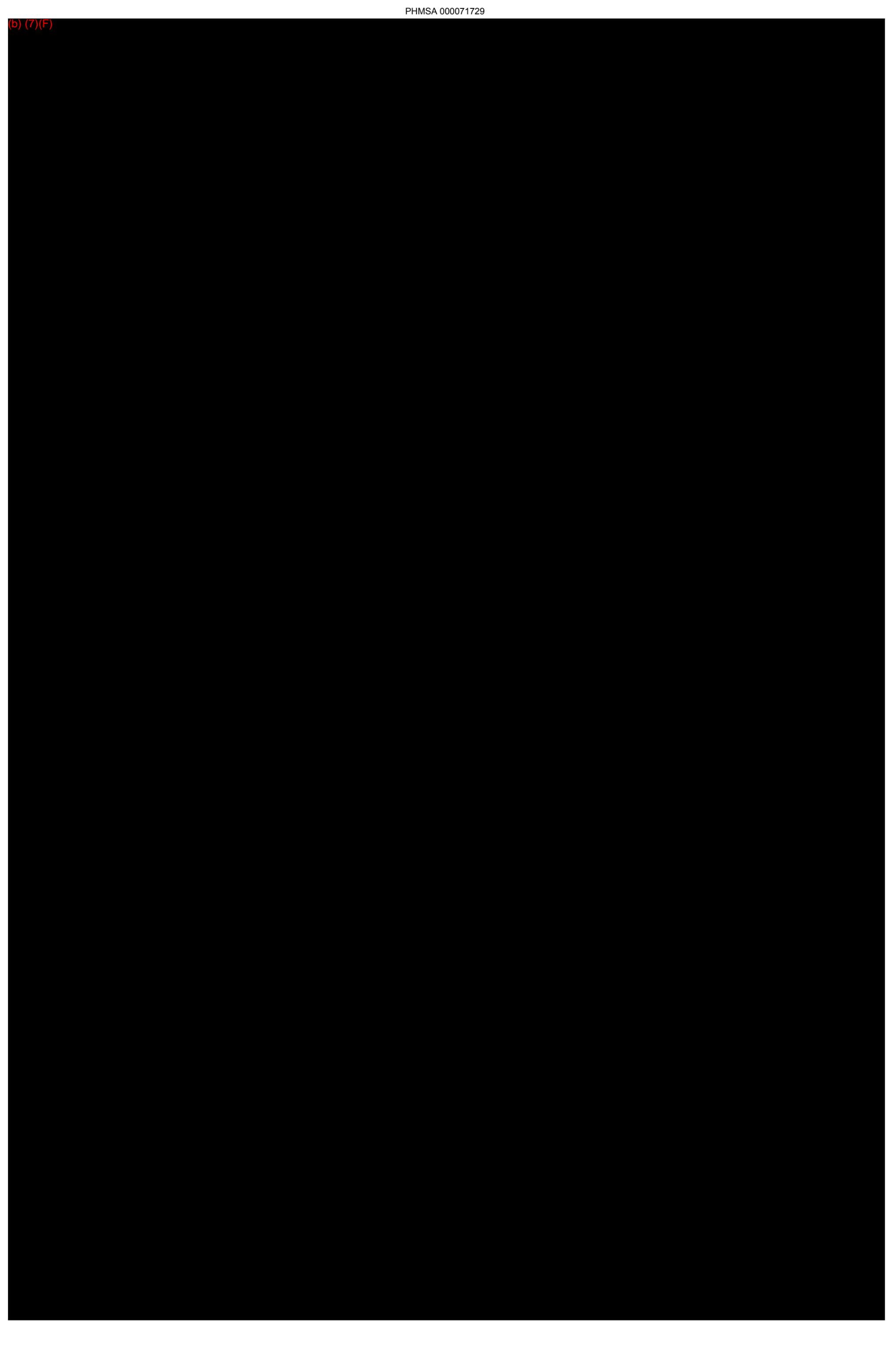
LINK FILES

AREA MAP



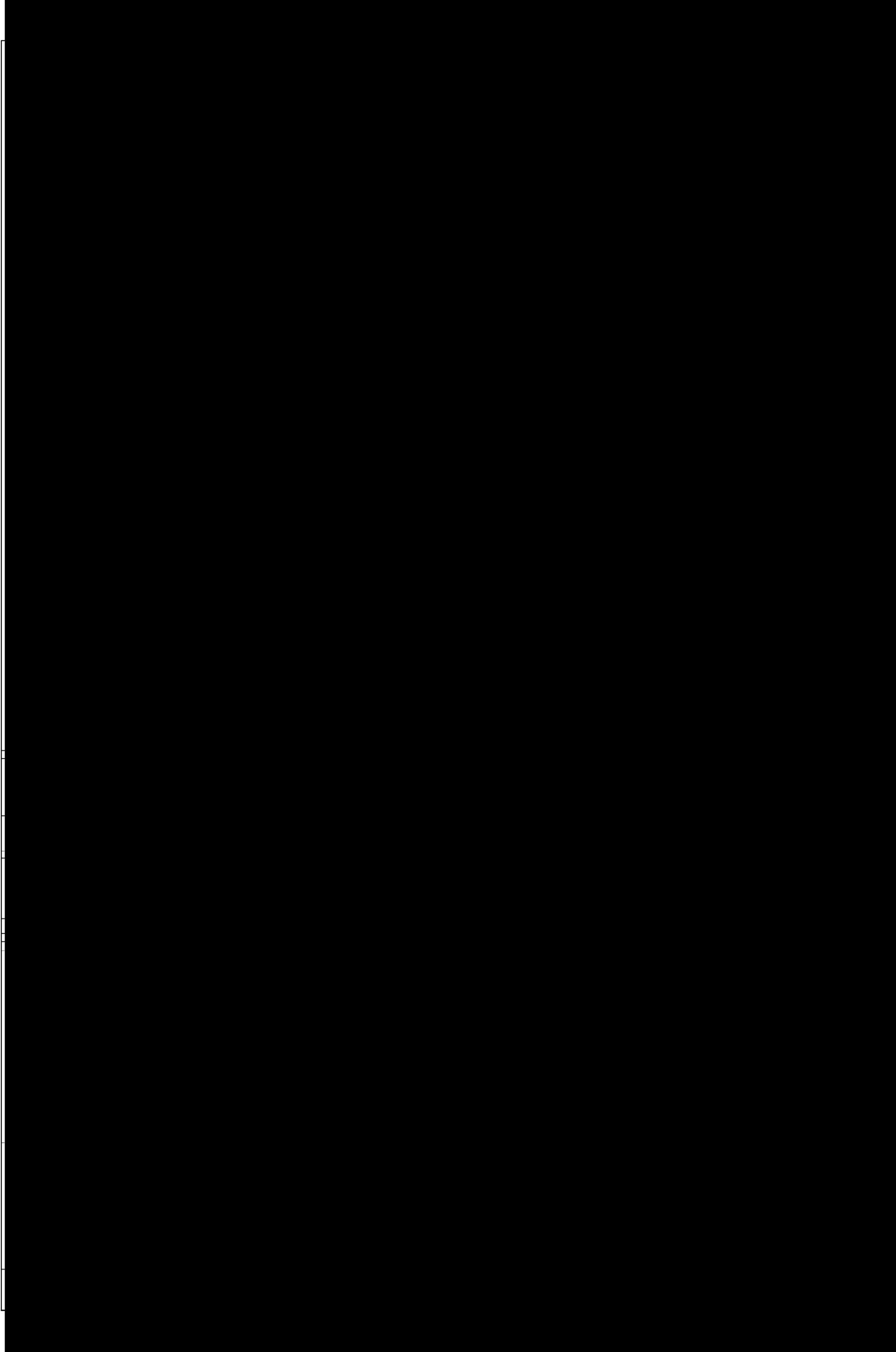
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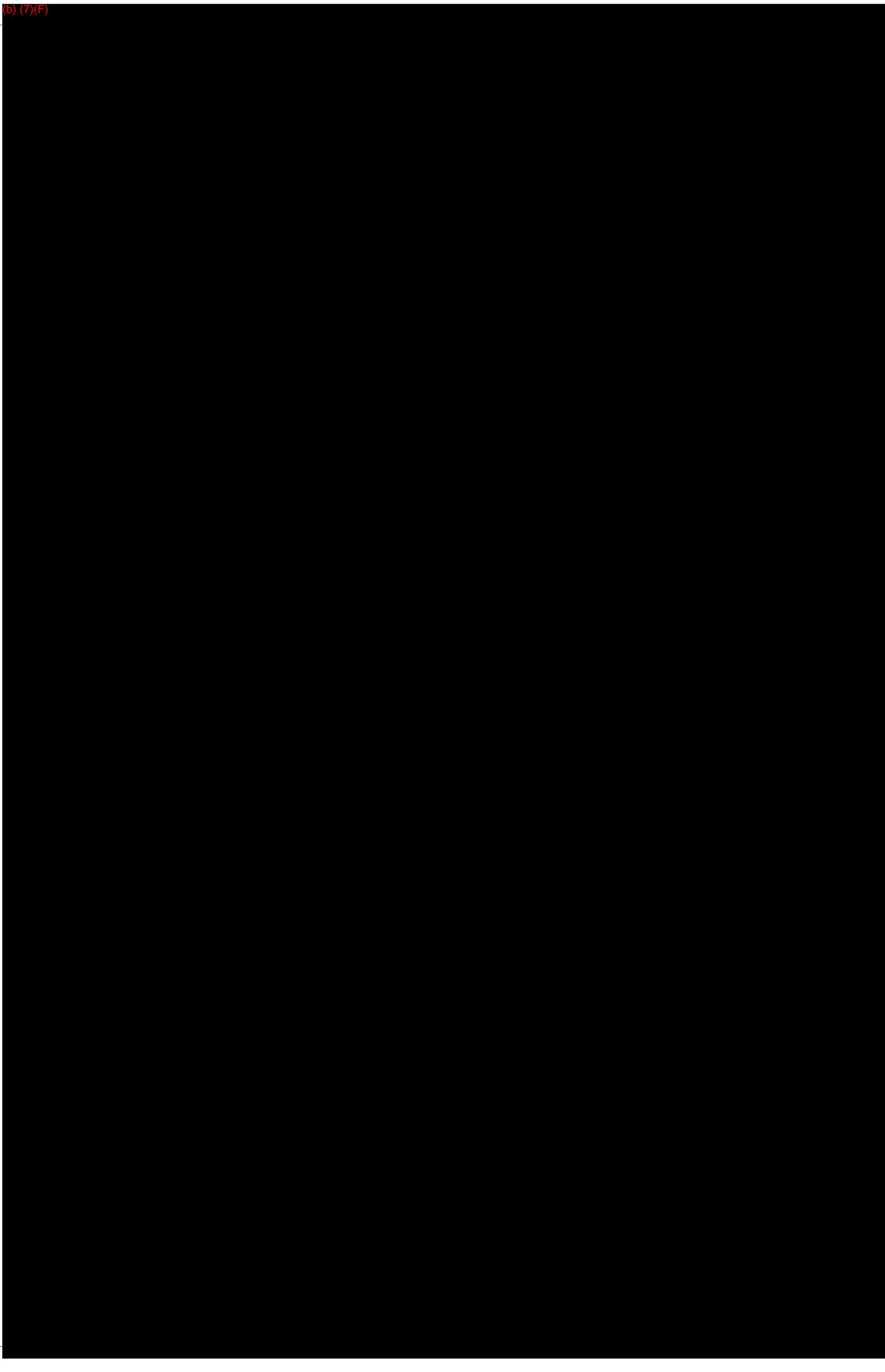


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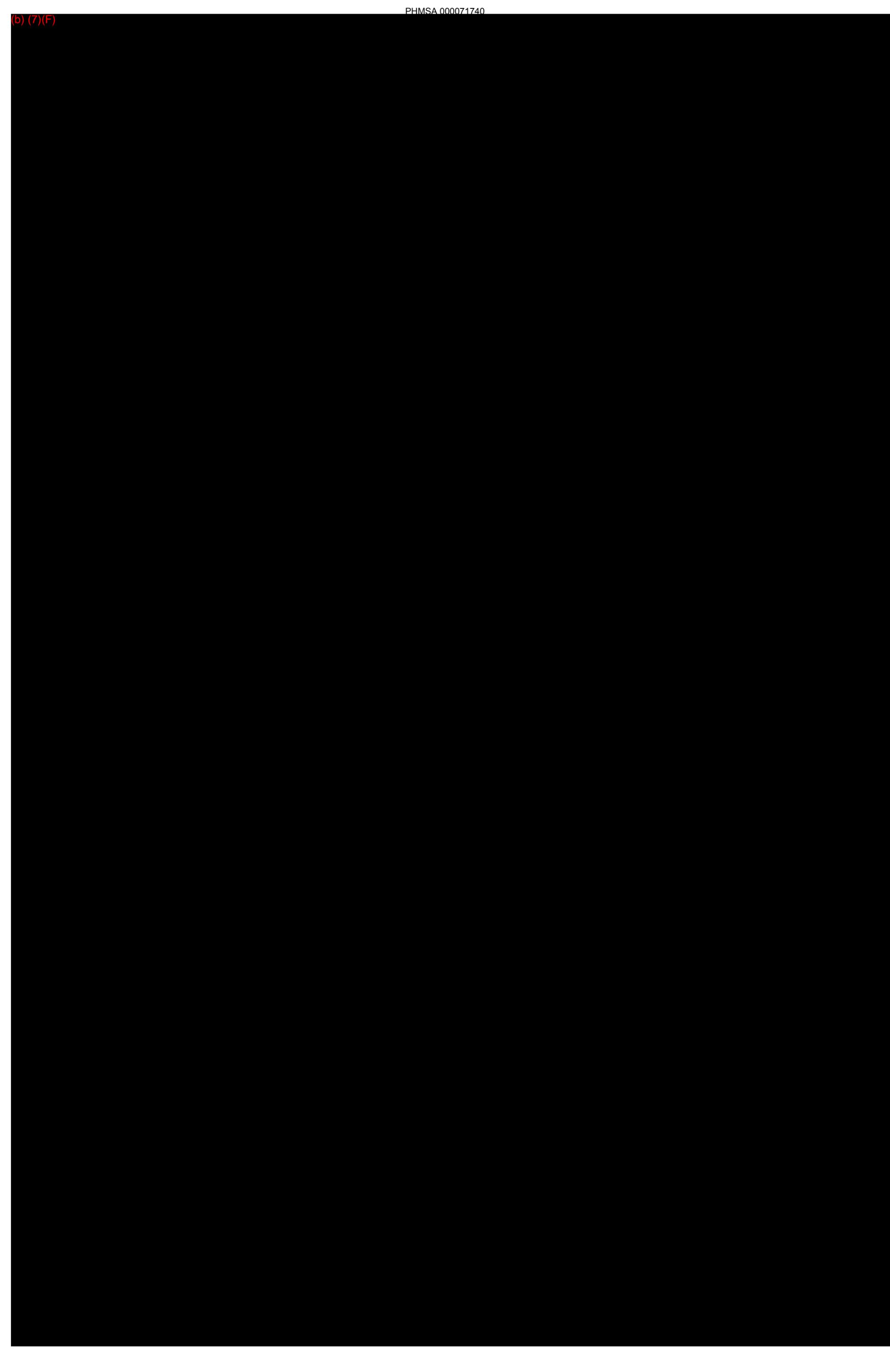


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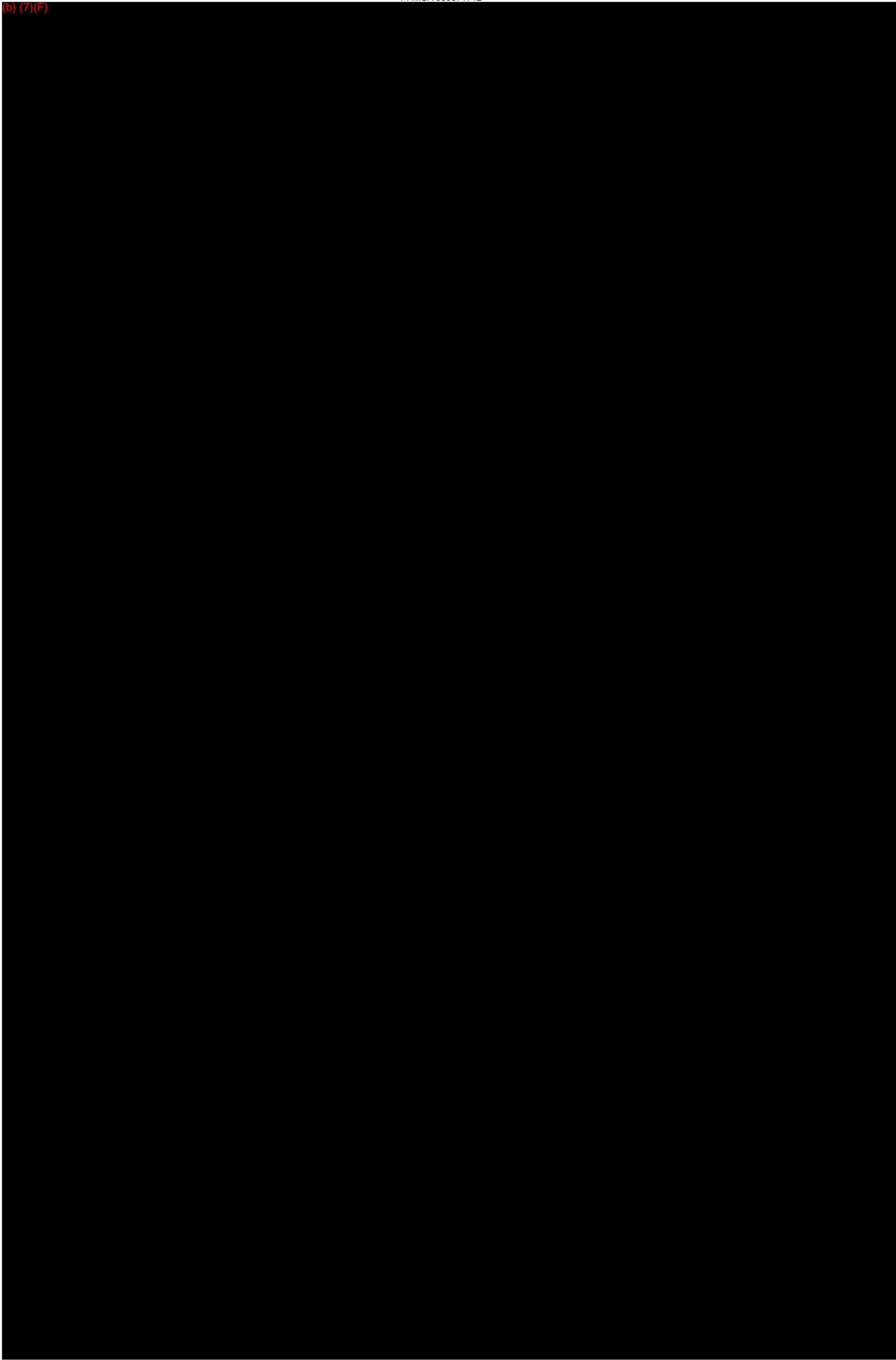
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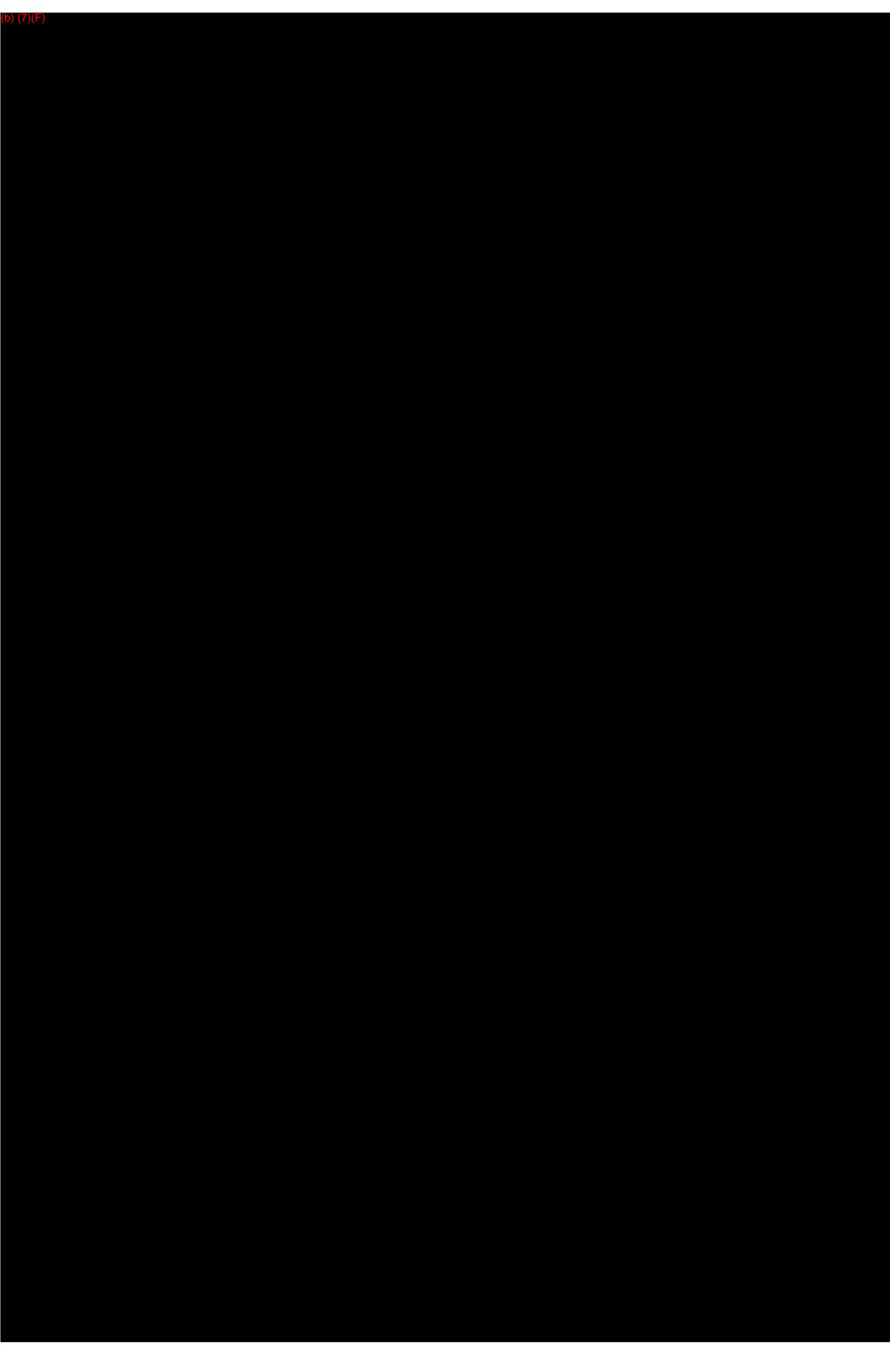




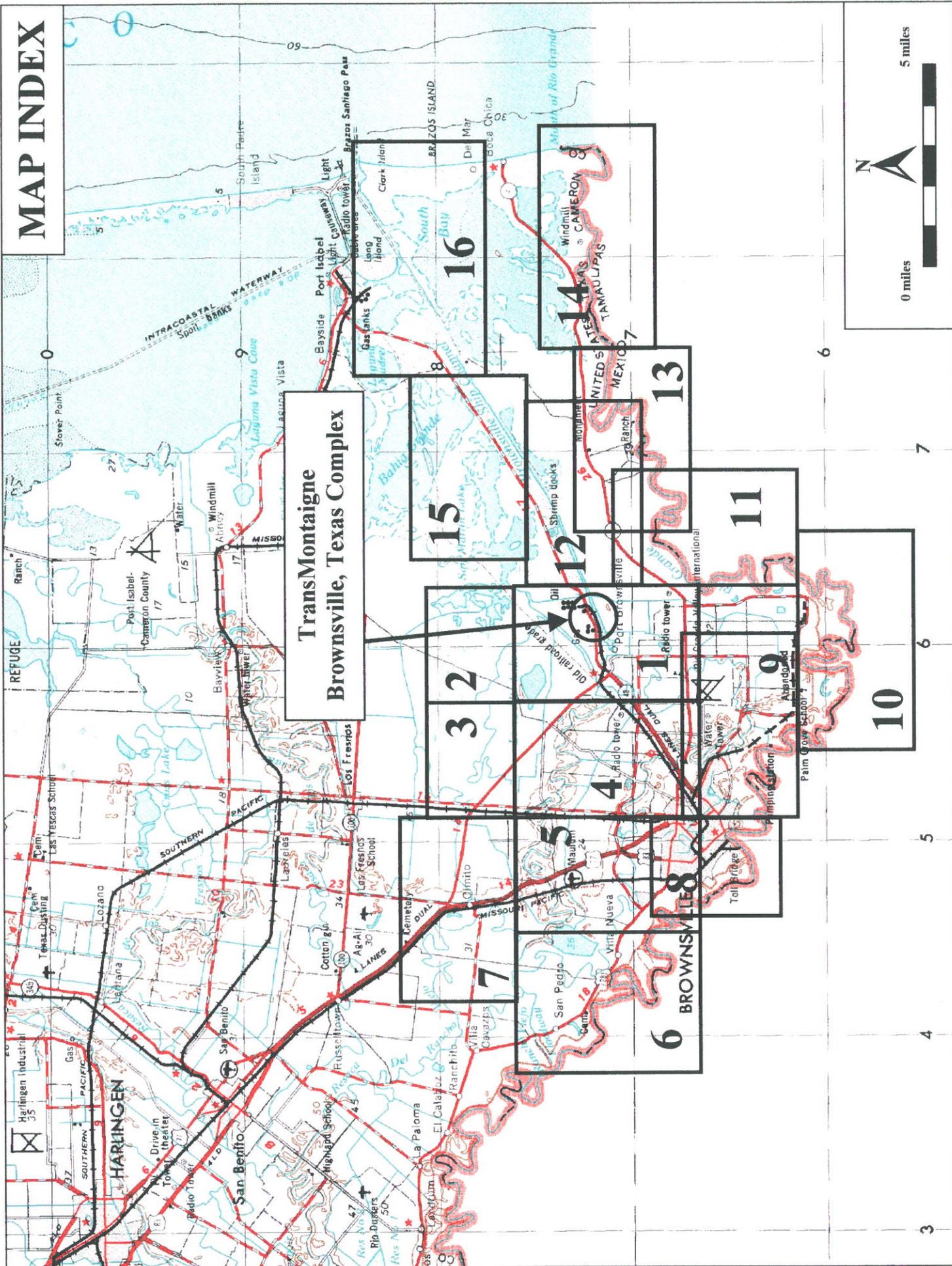
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(b) (7)(F)





MAP INDEX



**TransMontaigne
Brownsville, Texas Complex**

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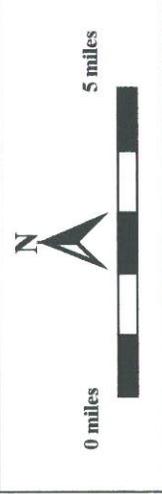
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11

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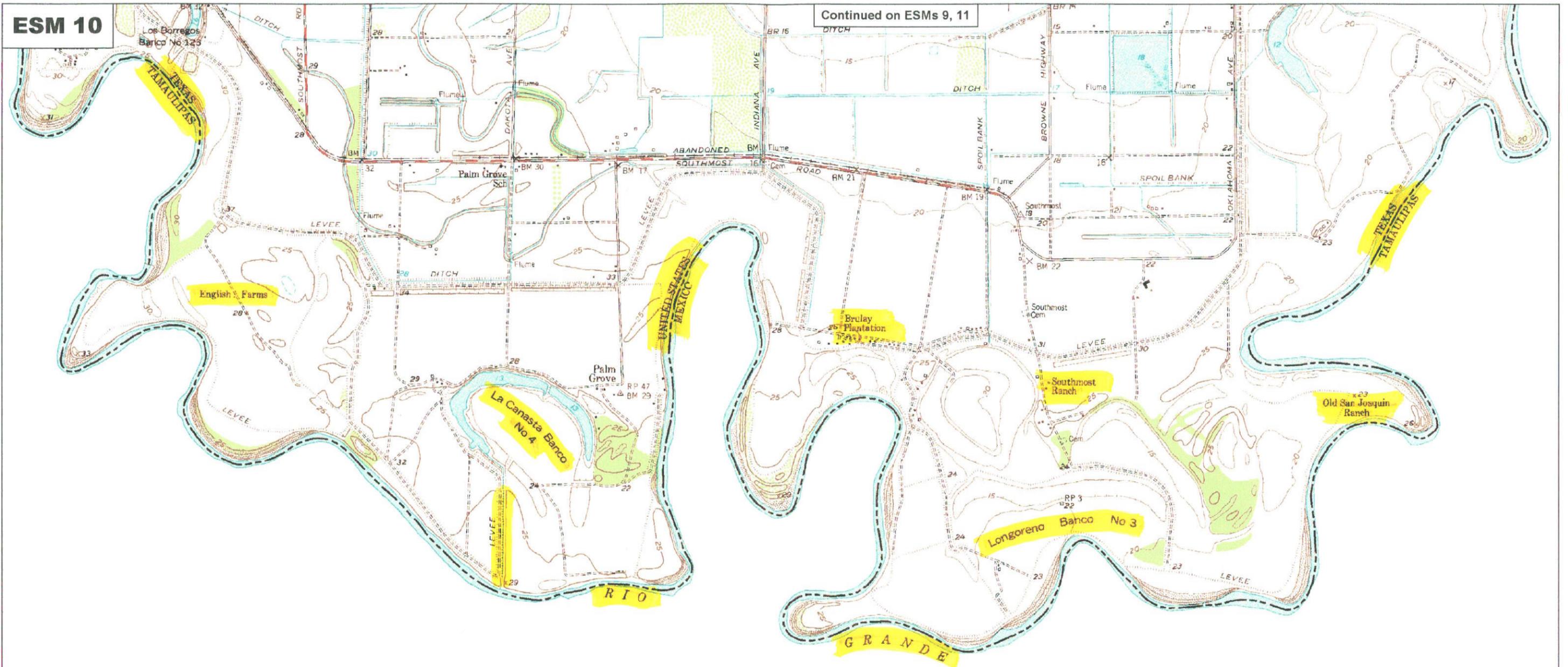
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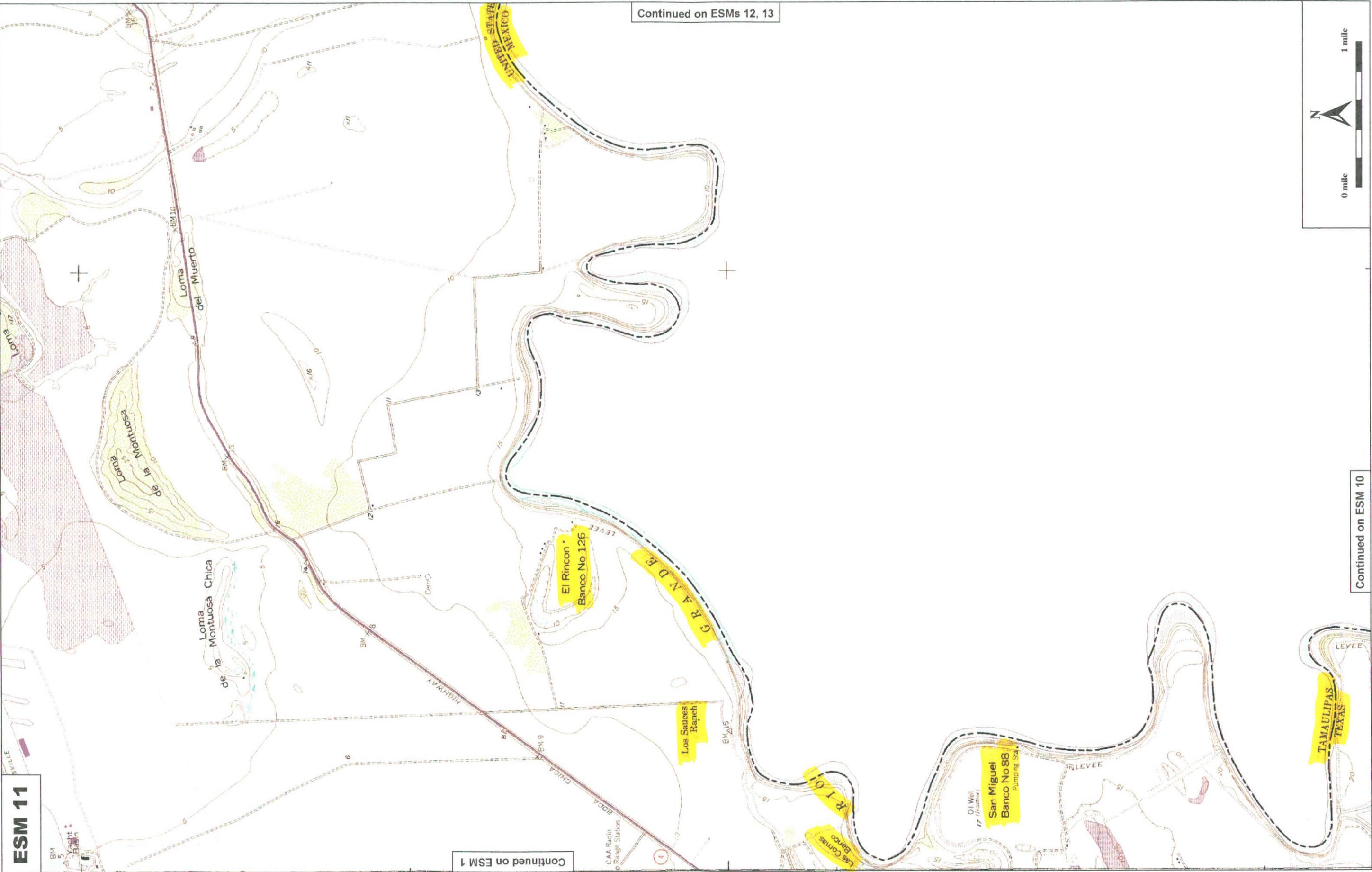


ESM 10

Continued on ESMs 9, 11



Continued on ESMs 12, 13



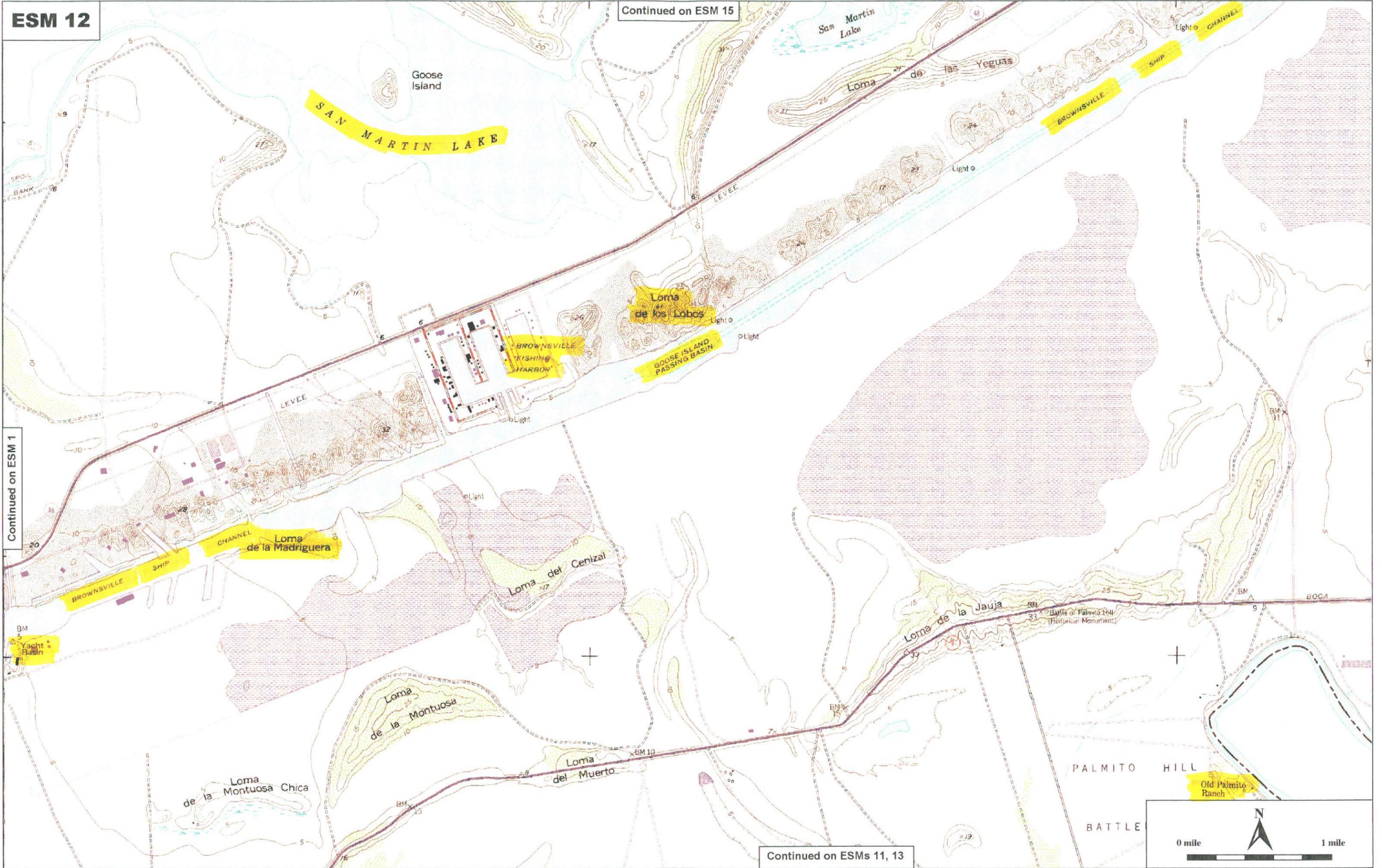
ESM 11

Continued on ESM 1

Continued on ESM 10

ESM 12

Continued on ESM 15



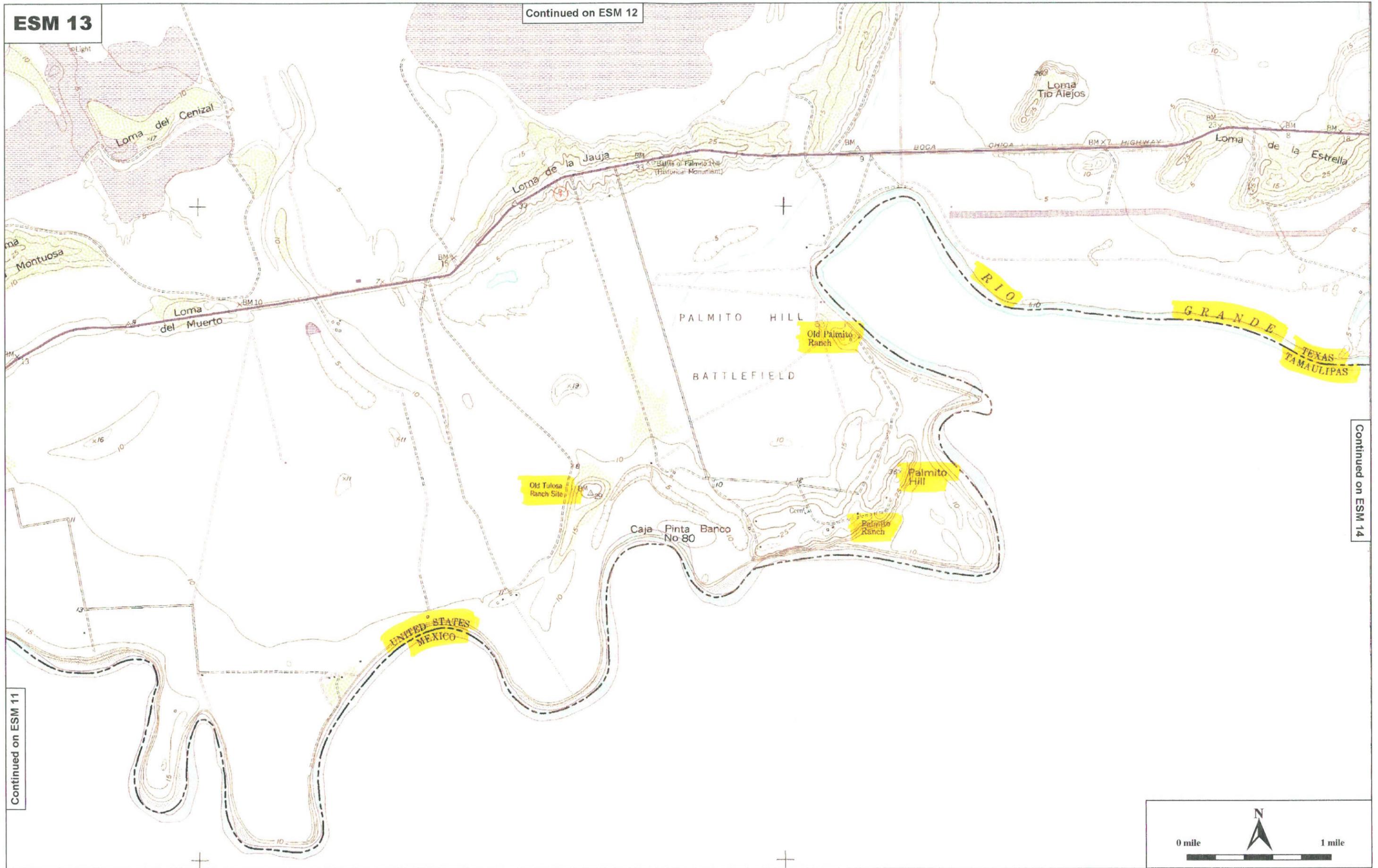
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Continued on ESMs 11, 13



ESM 13

Continued on ESM 12

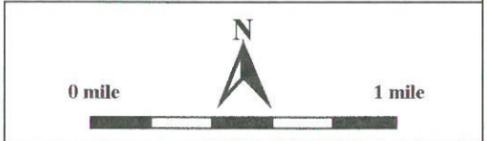
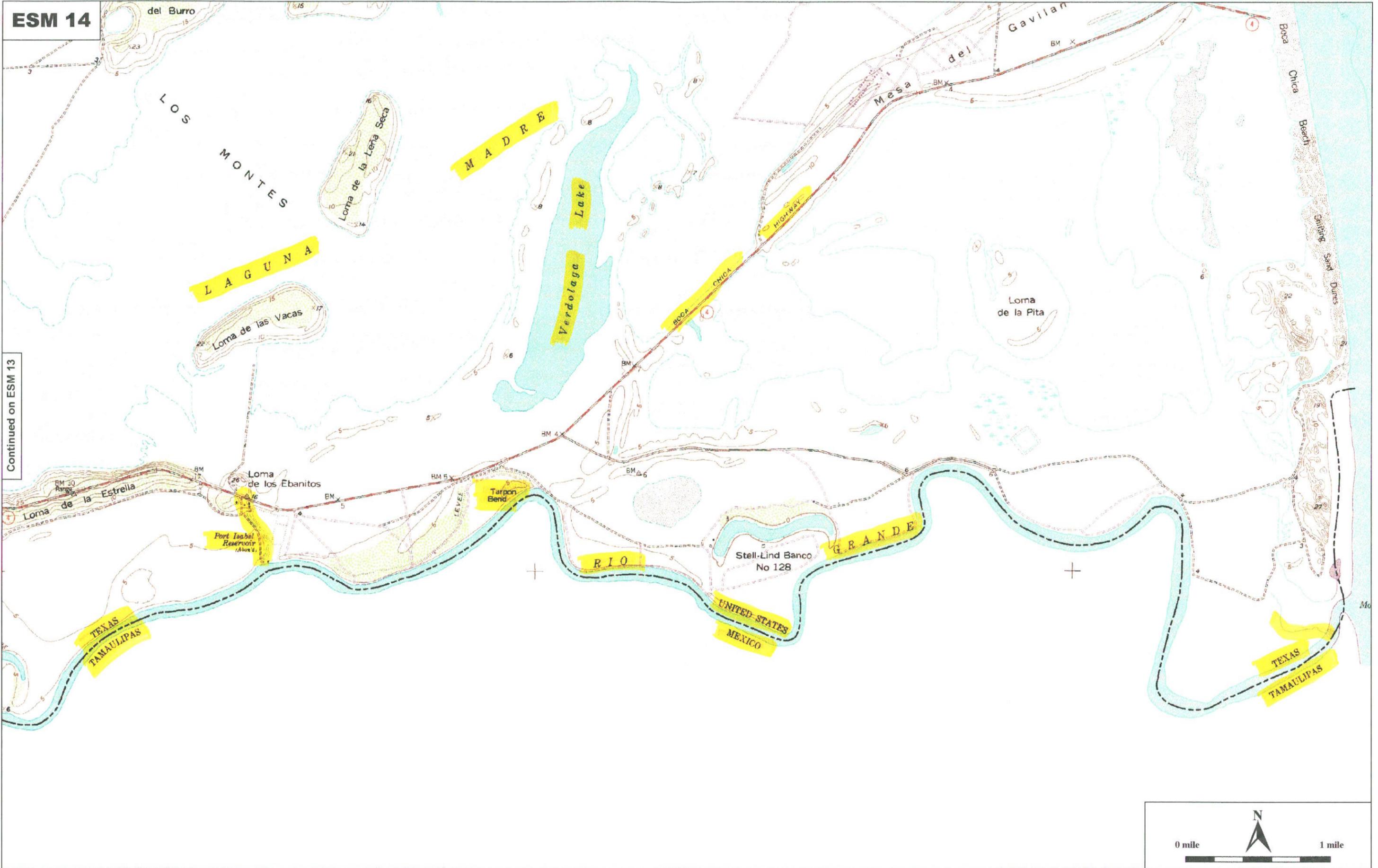


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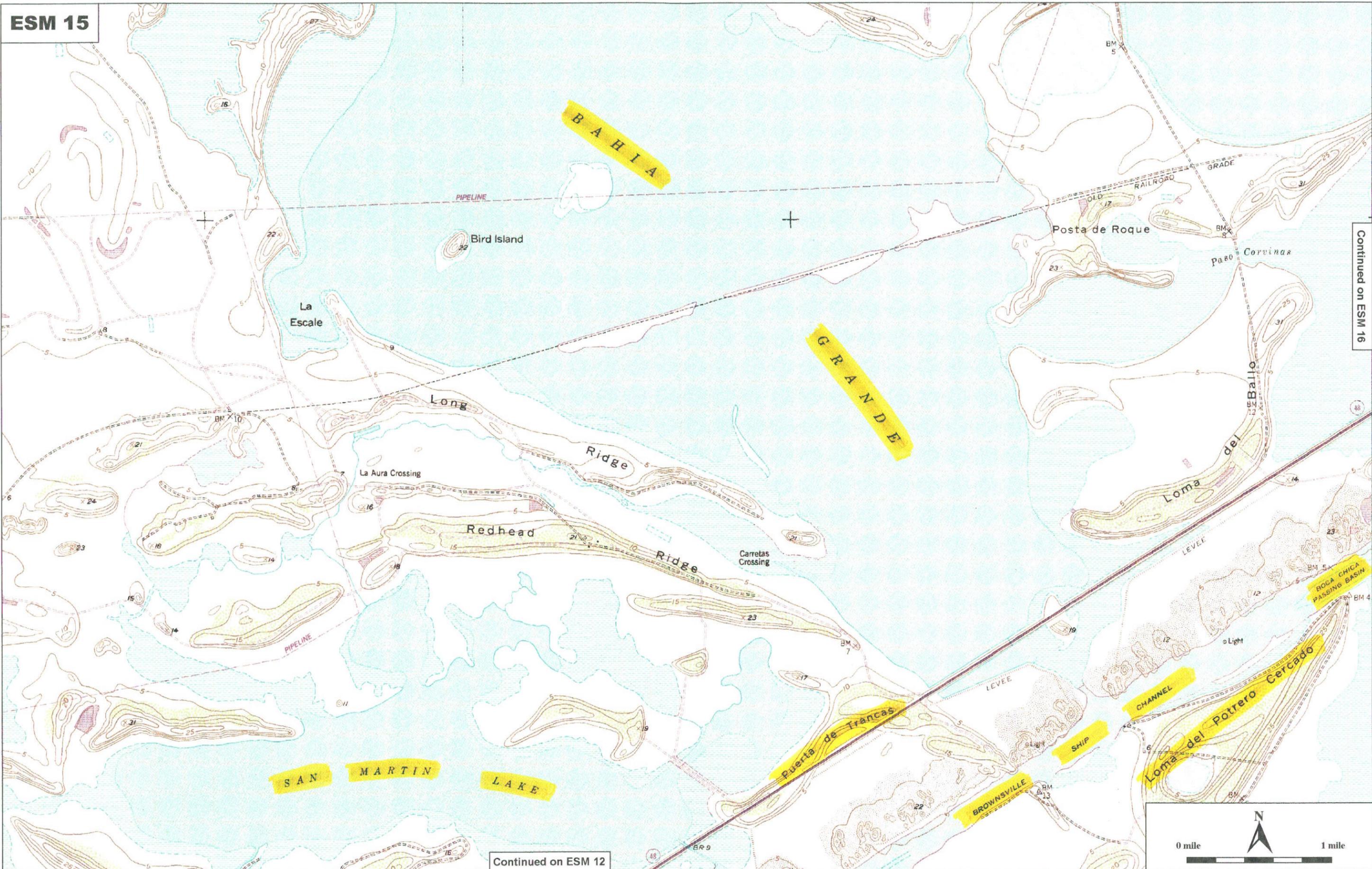
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ESM 14

Continued on ESM 13



ESM 15



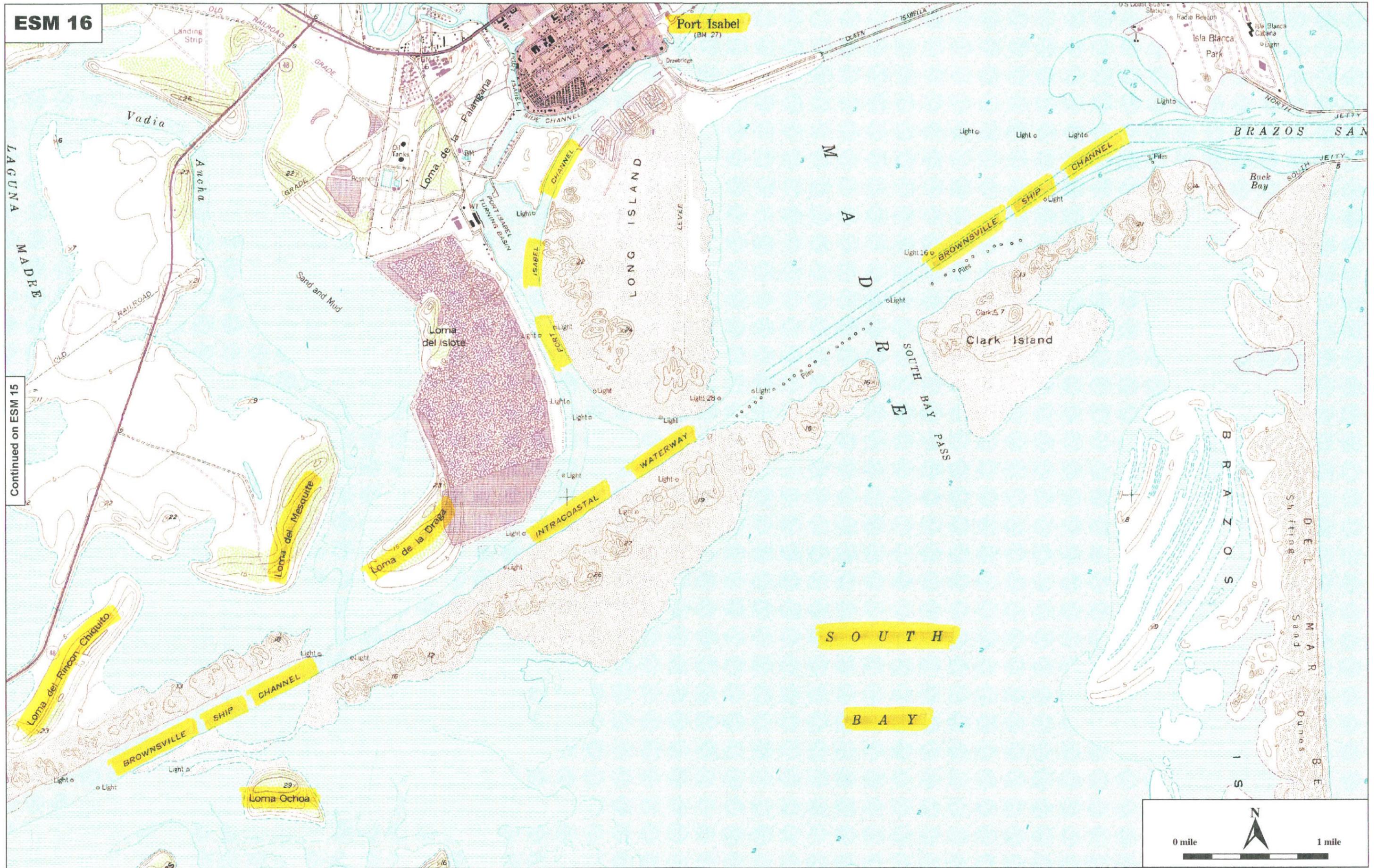
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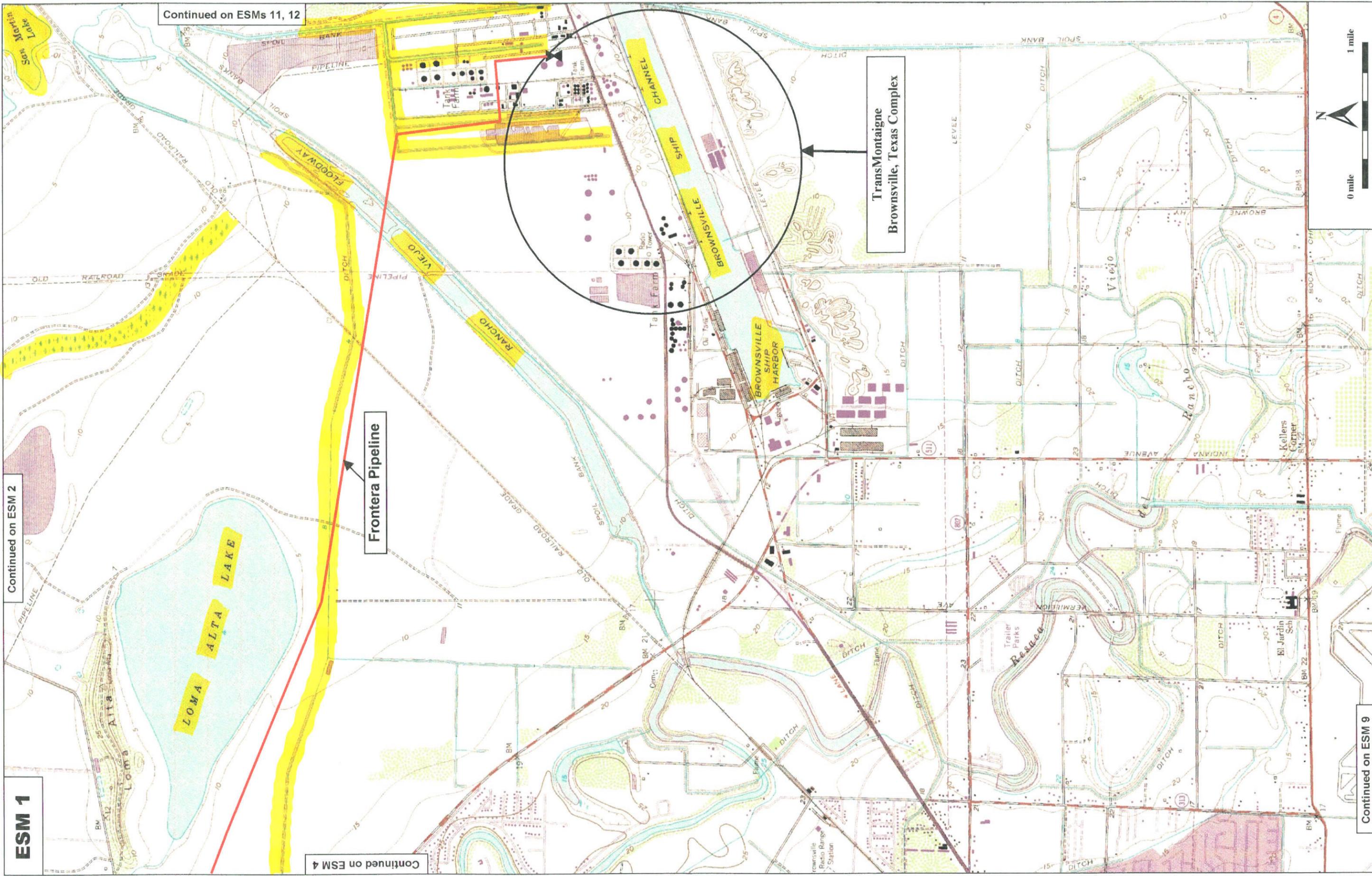
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ESM 16

Continued on ESM 15





Continued on ESMs 11, 12

Continued on ESM 2

ESM 1

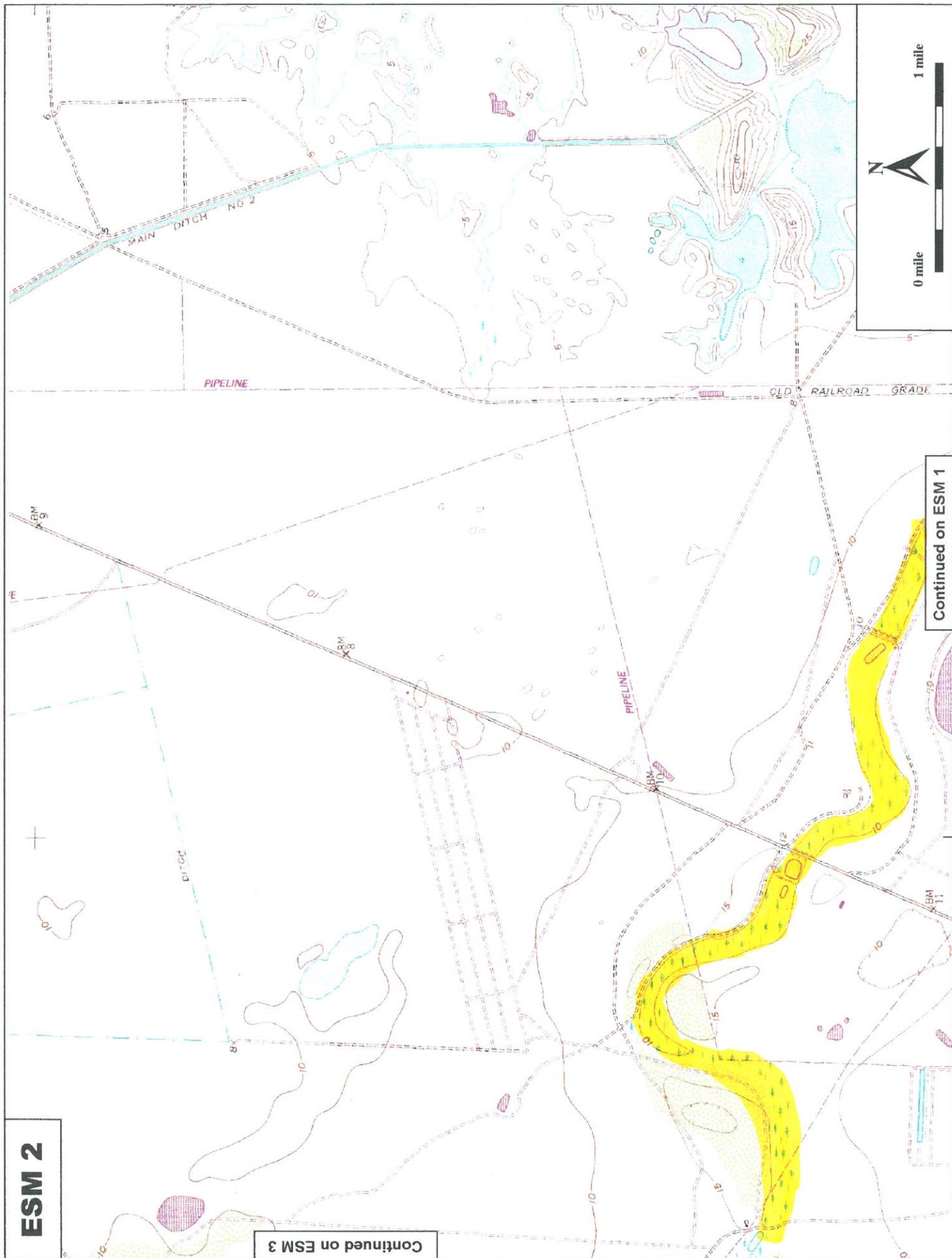
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Frontera Pipeline

TransMontaigne
Brownsville, Texas Complex

Continued on ESM 9

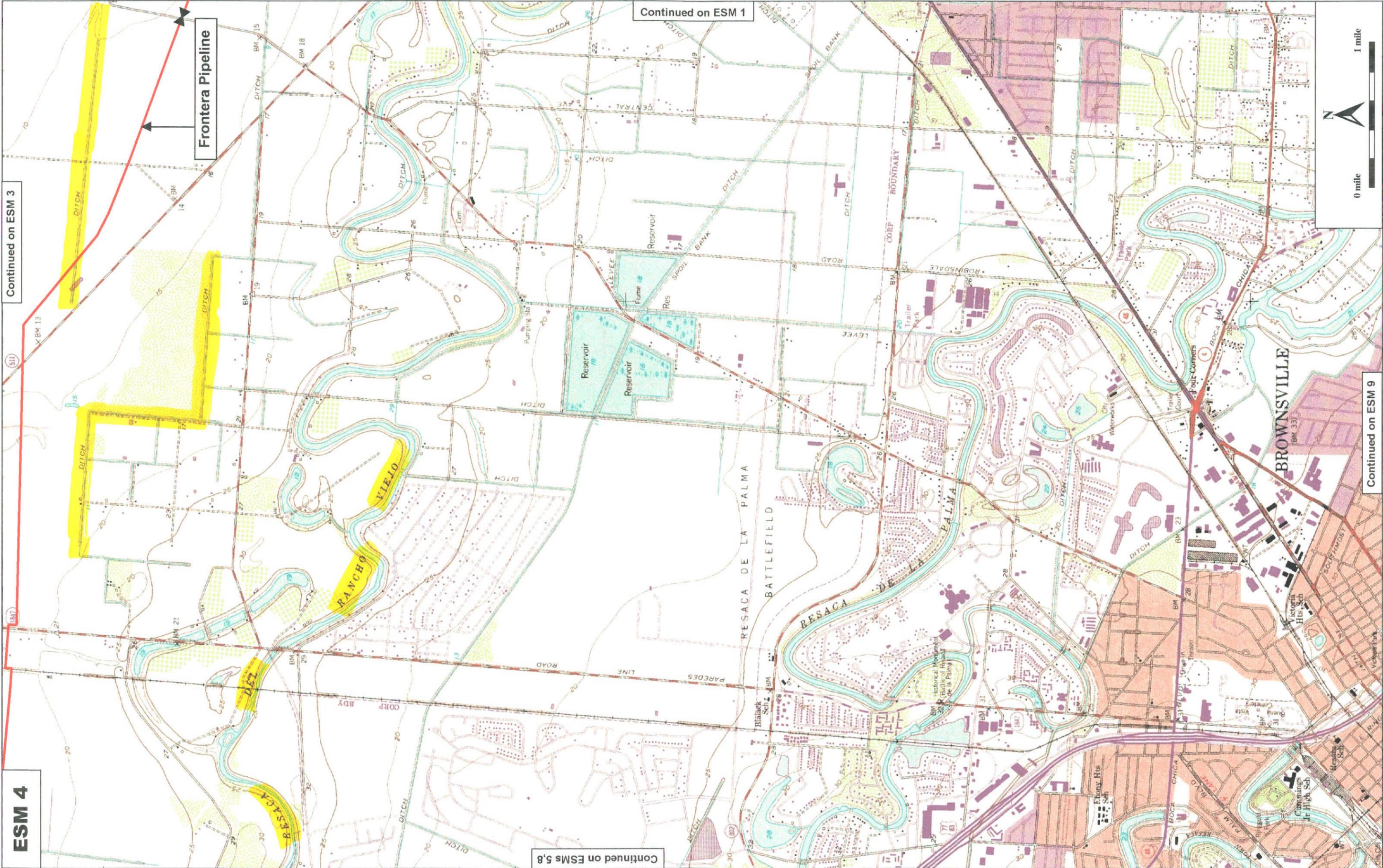
0 mile 1 mile



ESM 2

Continued on ESM 3

Continued on ESM 1



Continued on ESM 3

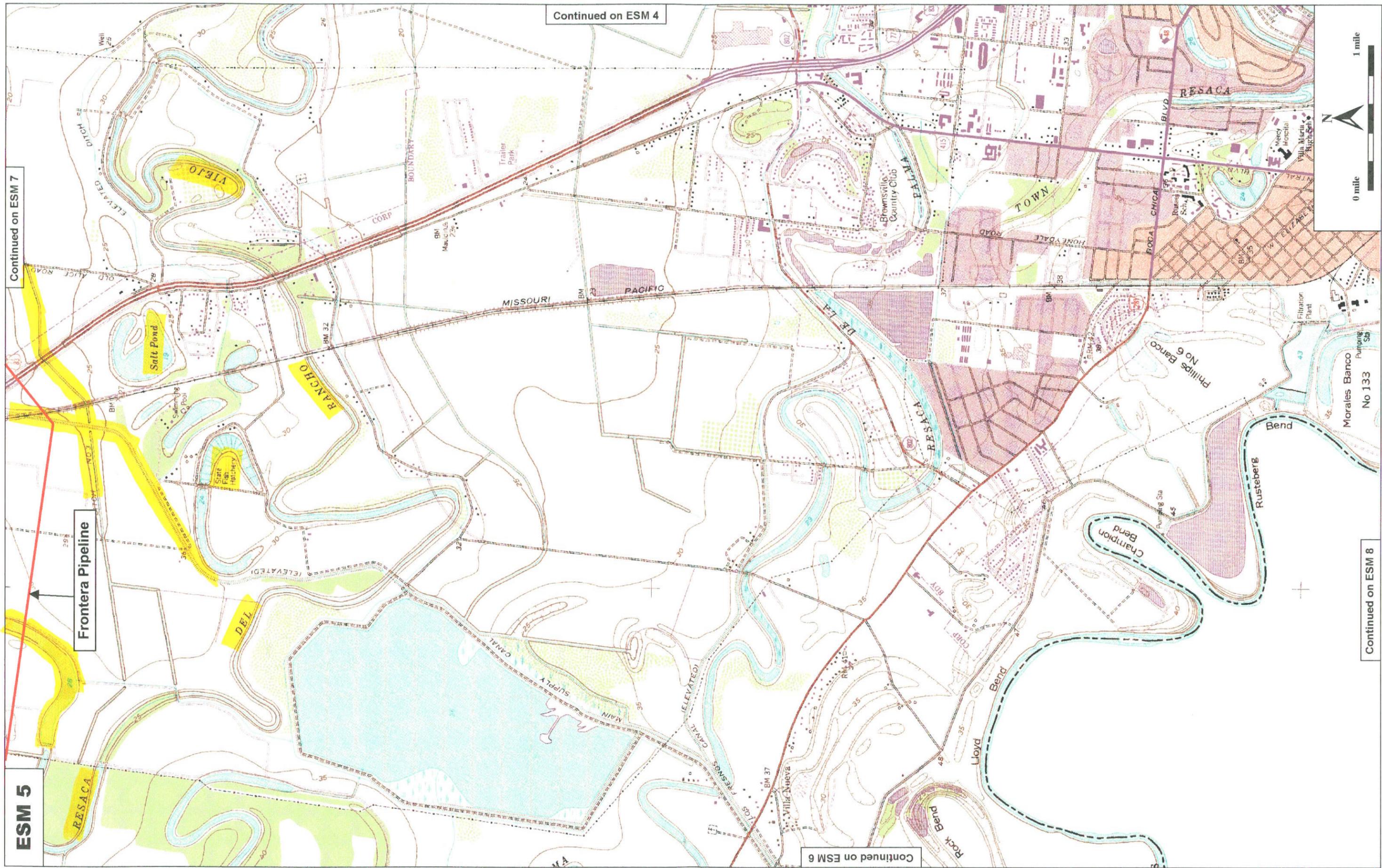
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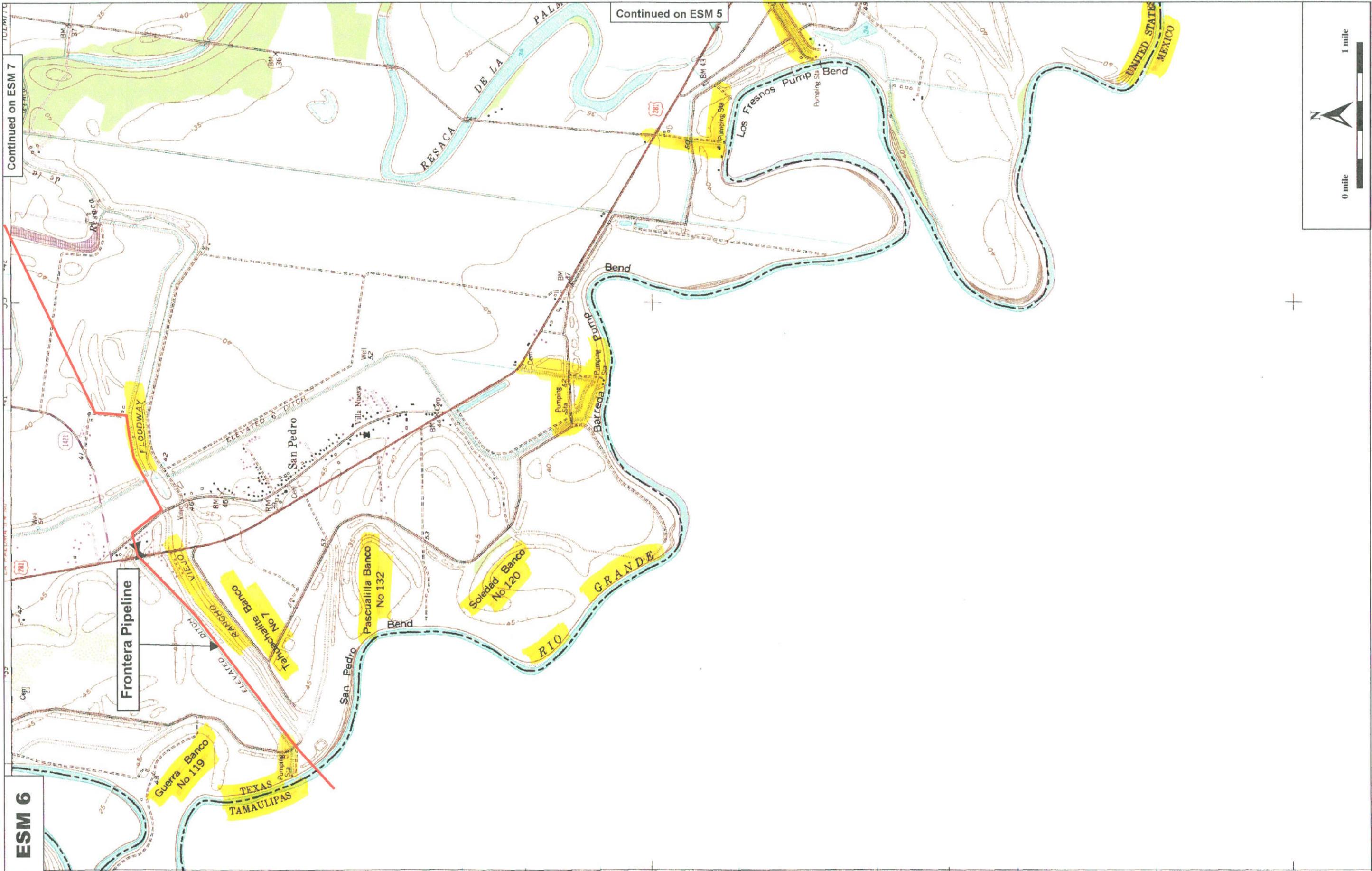
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Continued on ESM 1

Continued on ESM 9







ESM 6

Continued on ESM 7

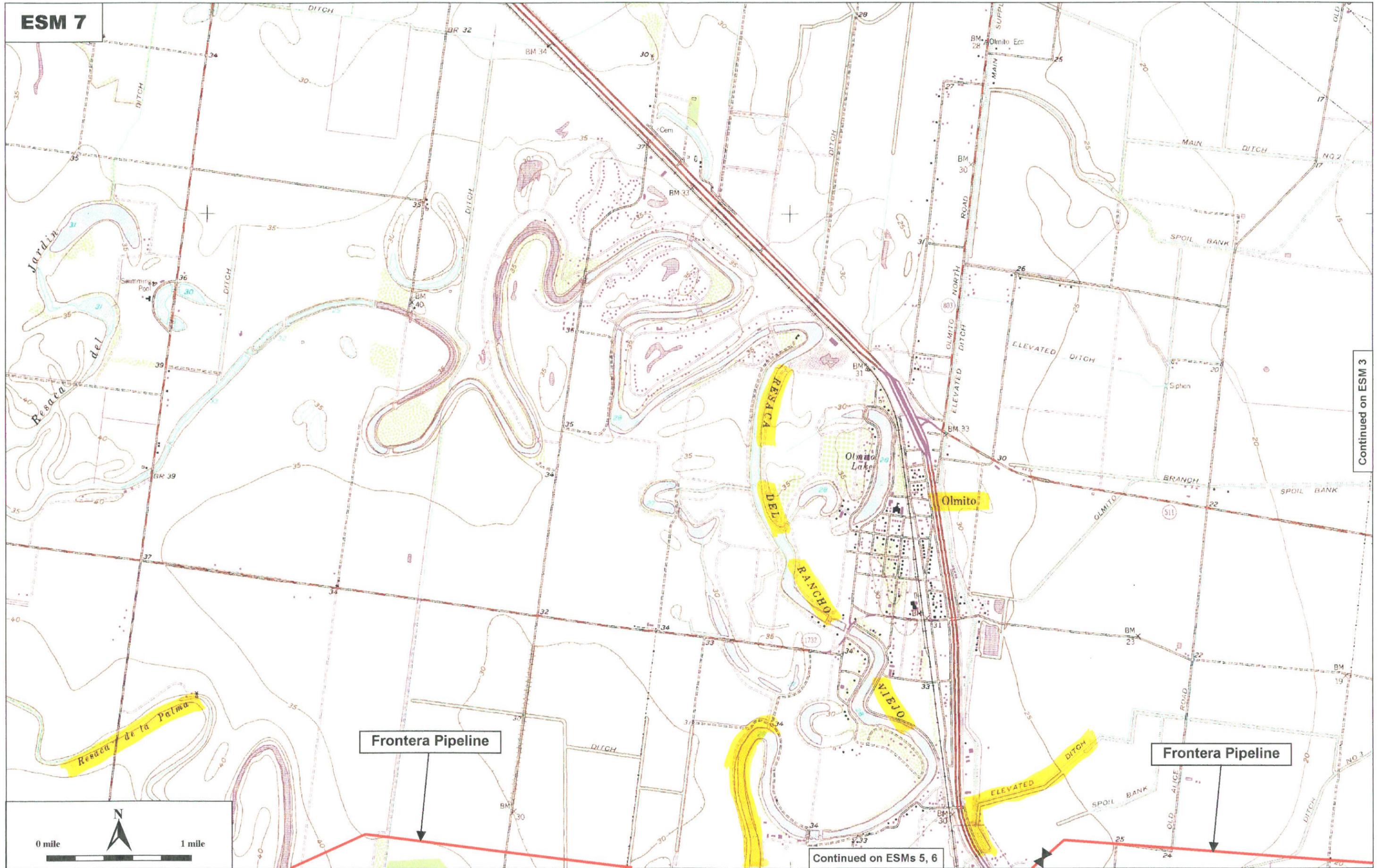
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0 mile 1 mile

A north arrow pointing upwards and a scale bar showing 0 to 1 mile.



ESM 7



Continued on ESM 3

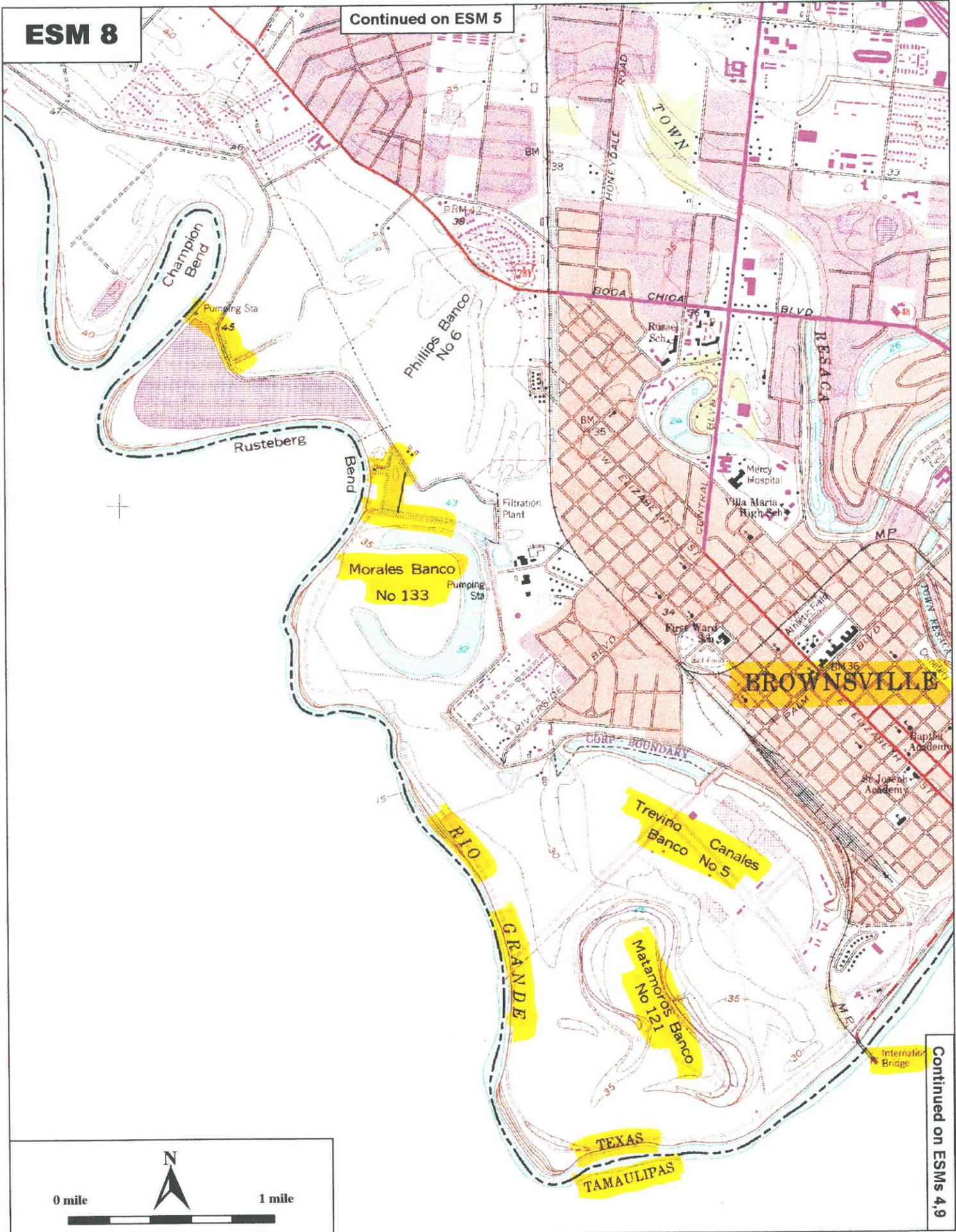
Frontera Pipeline

Frontera Pipeline

Continued on ESMs 5, 6

ESM 8

Continued on ESM 5



Continued on ESMs 4,9

ESM 9

Continued on ESMs 1, 4

BROWNSVILLE
BM 33

BROWNSVILLE INTERNATIONAL AIRPORT

Continued on ESM 8

TAMAILIPAS TEXAS

Lozano Banco

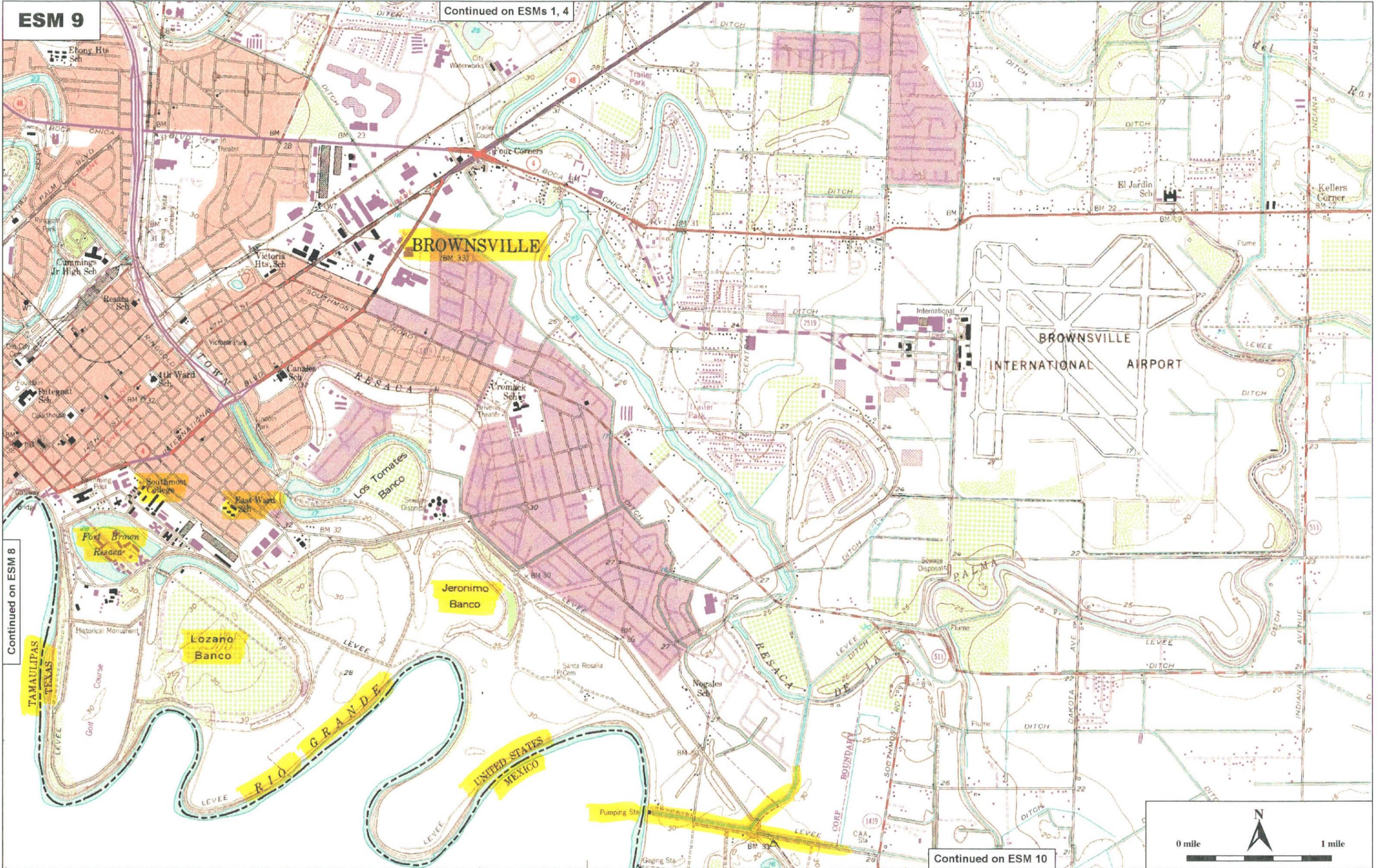
Jeronimo Banco

RIO GRANDE

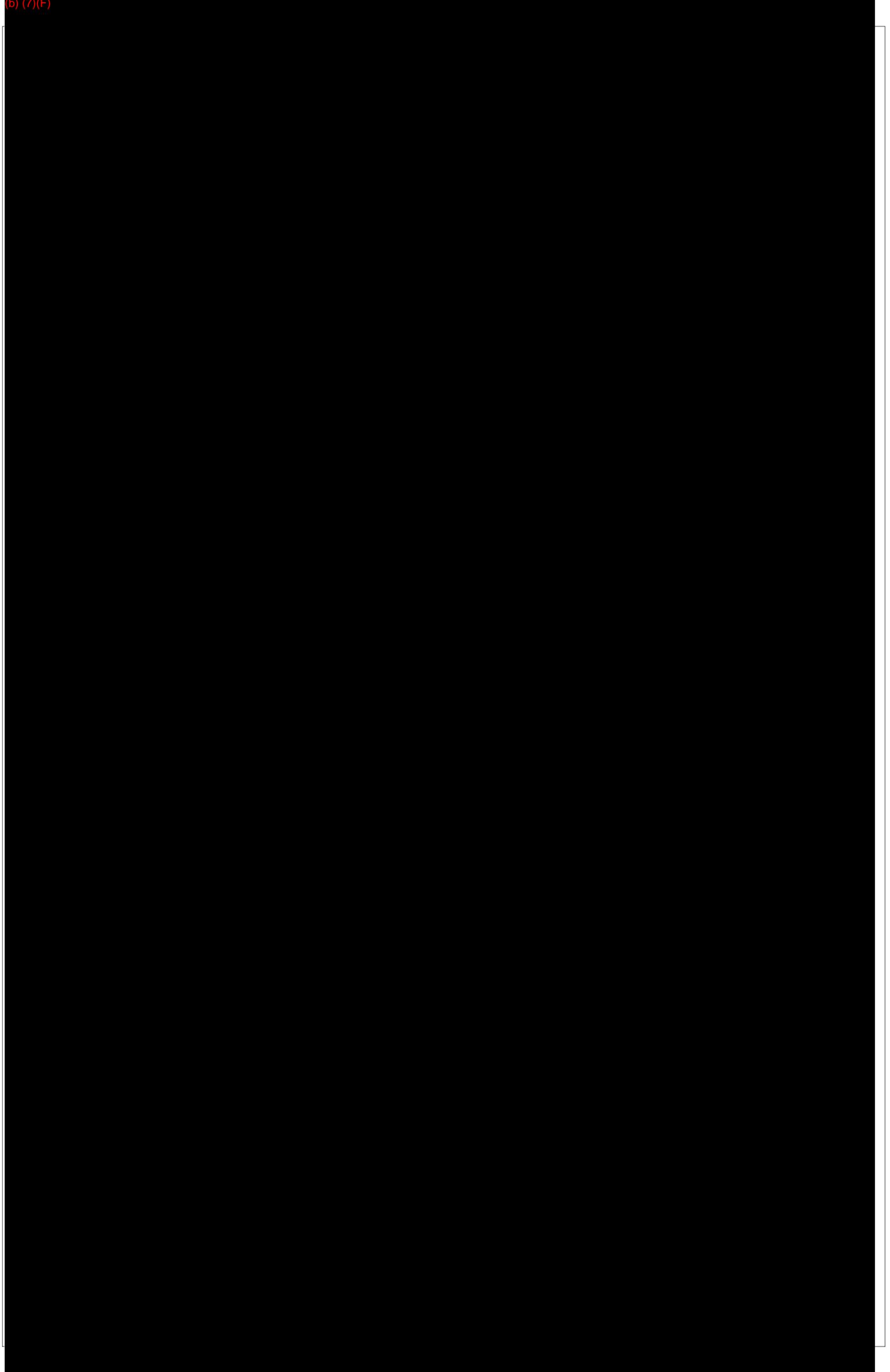
UNITED STATES MEXICO

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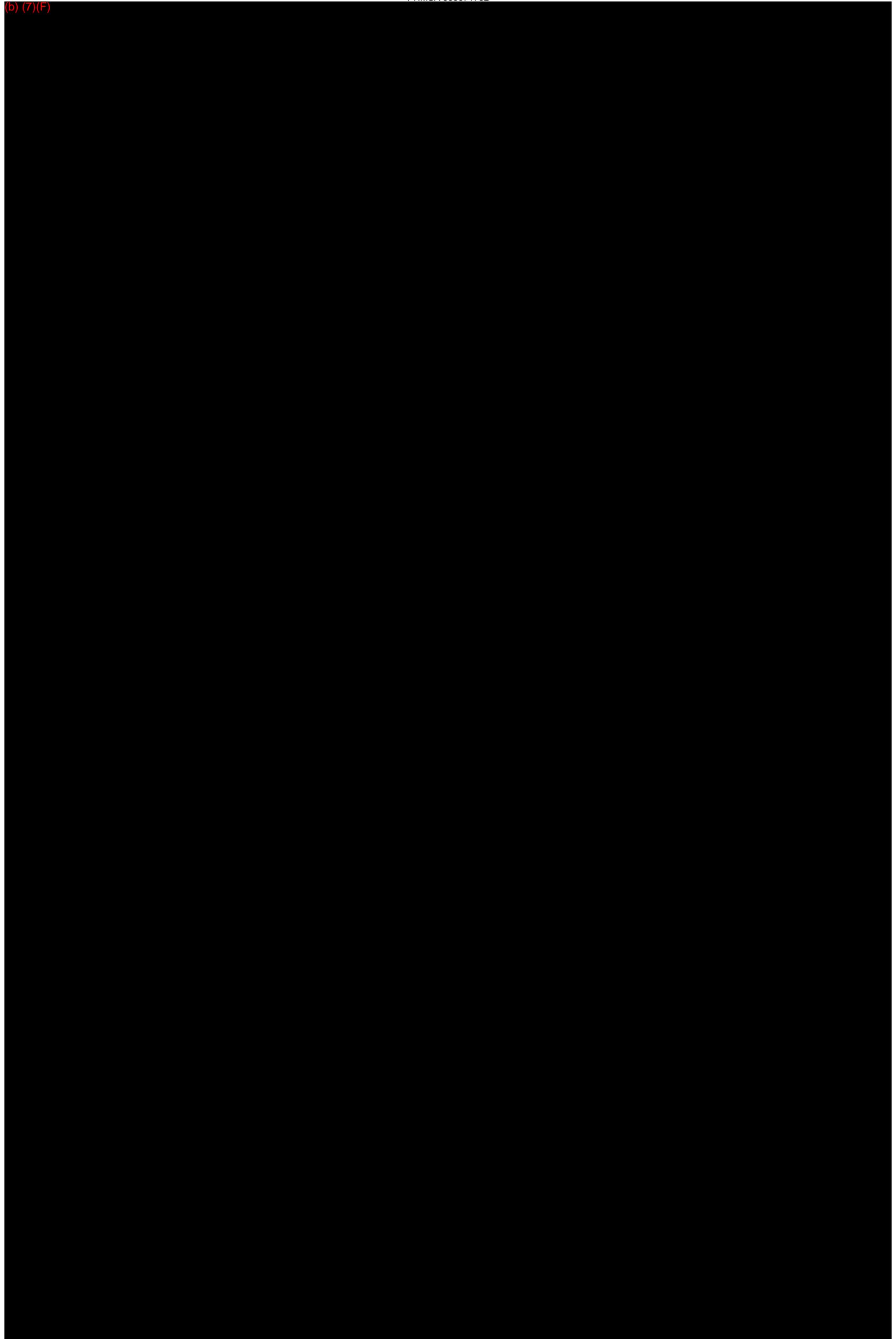
0 mile 1 mile



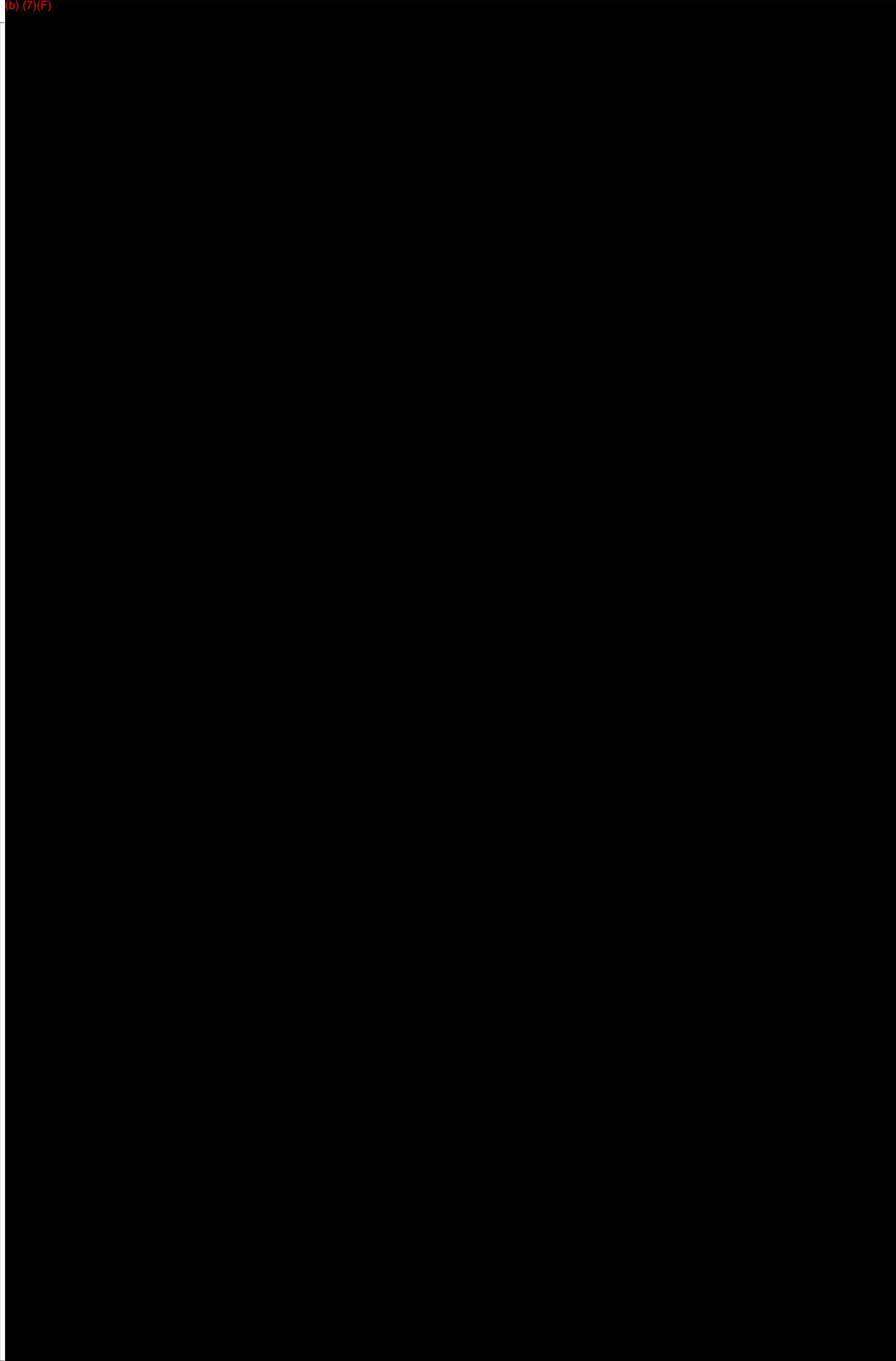
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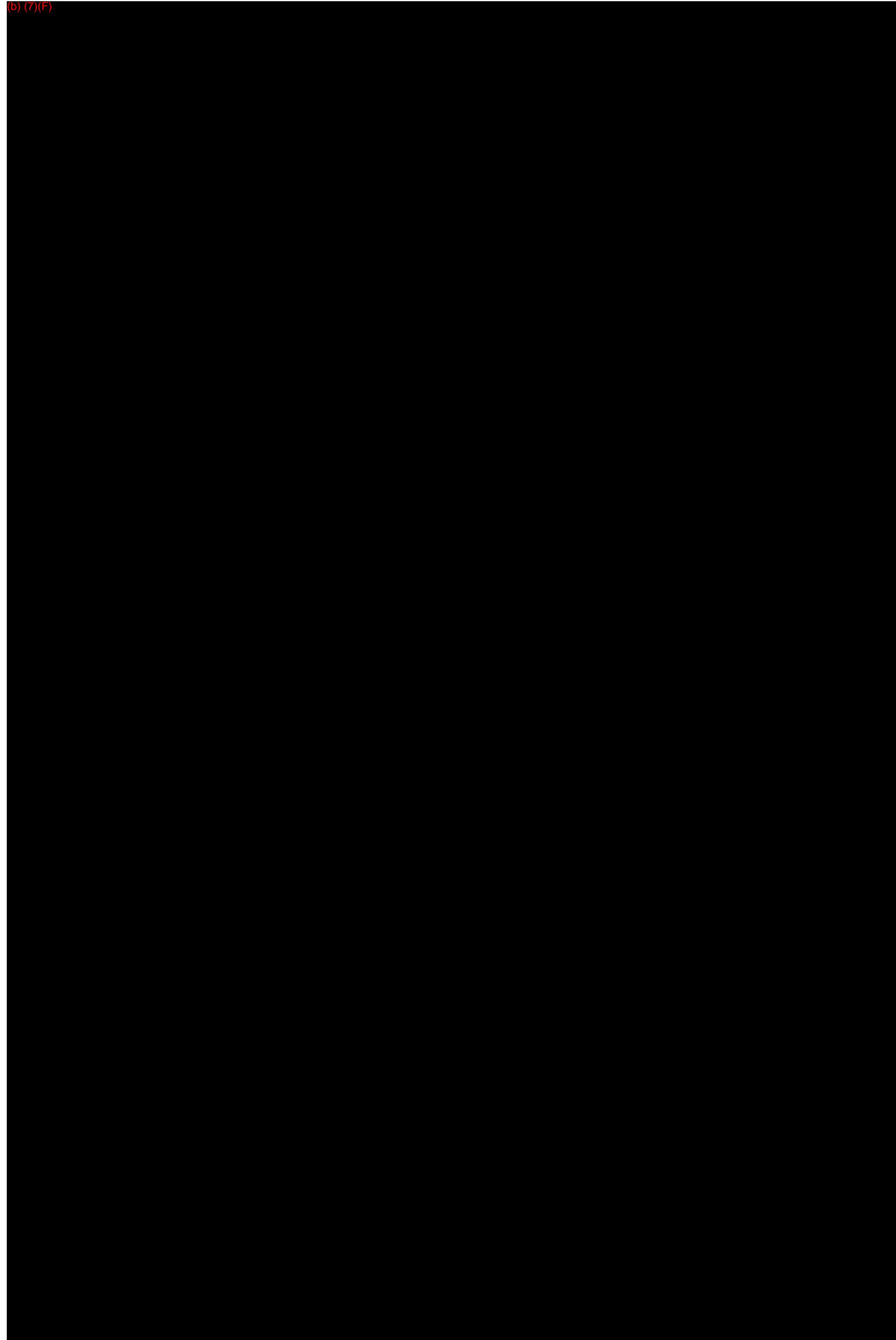
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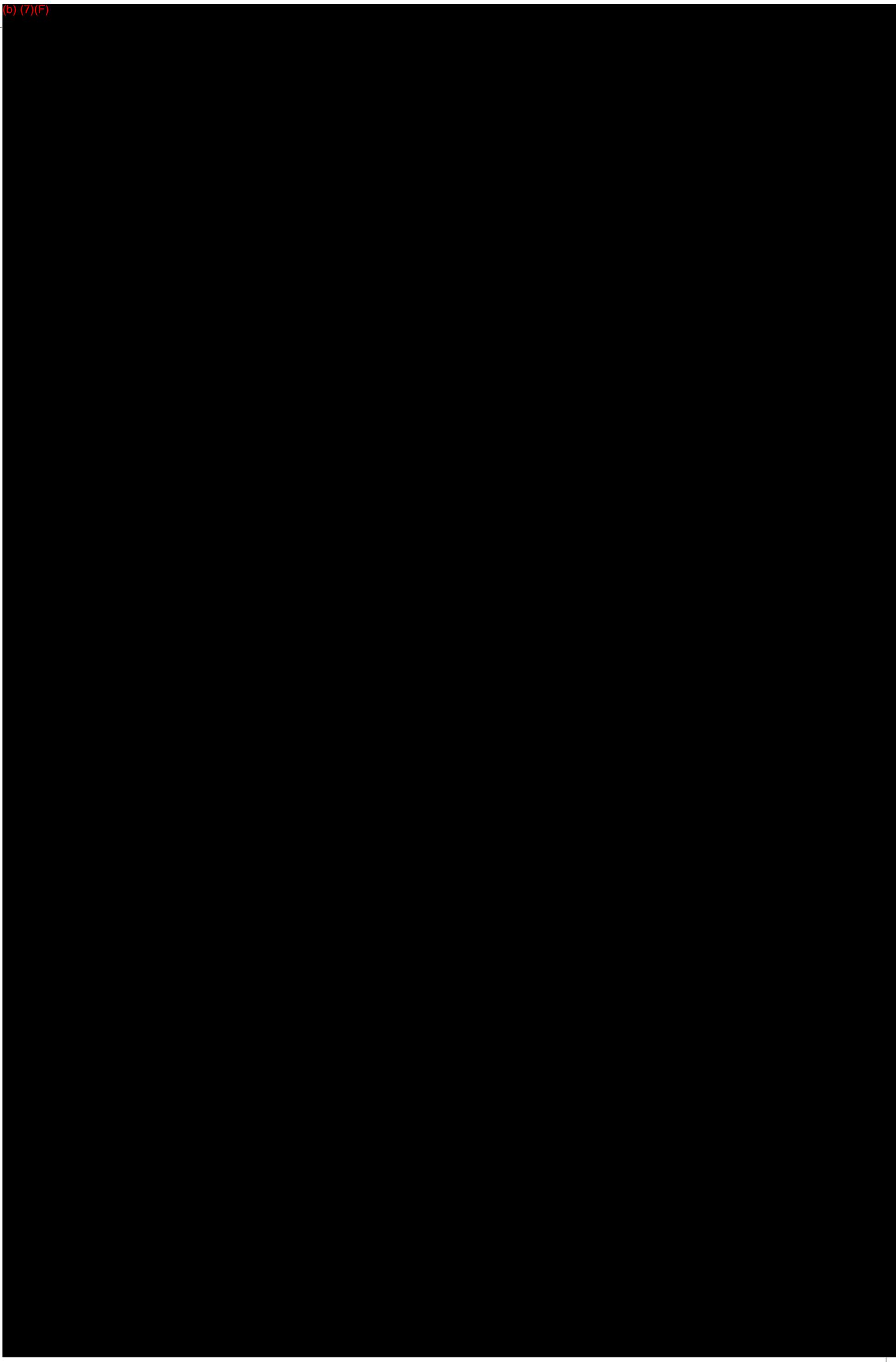
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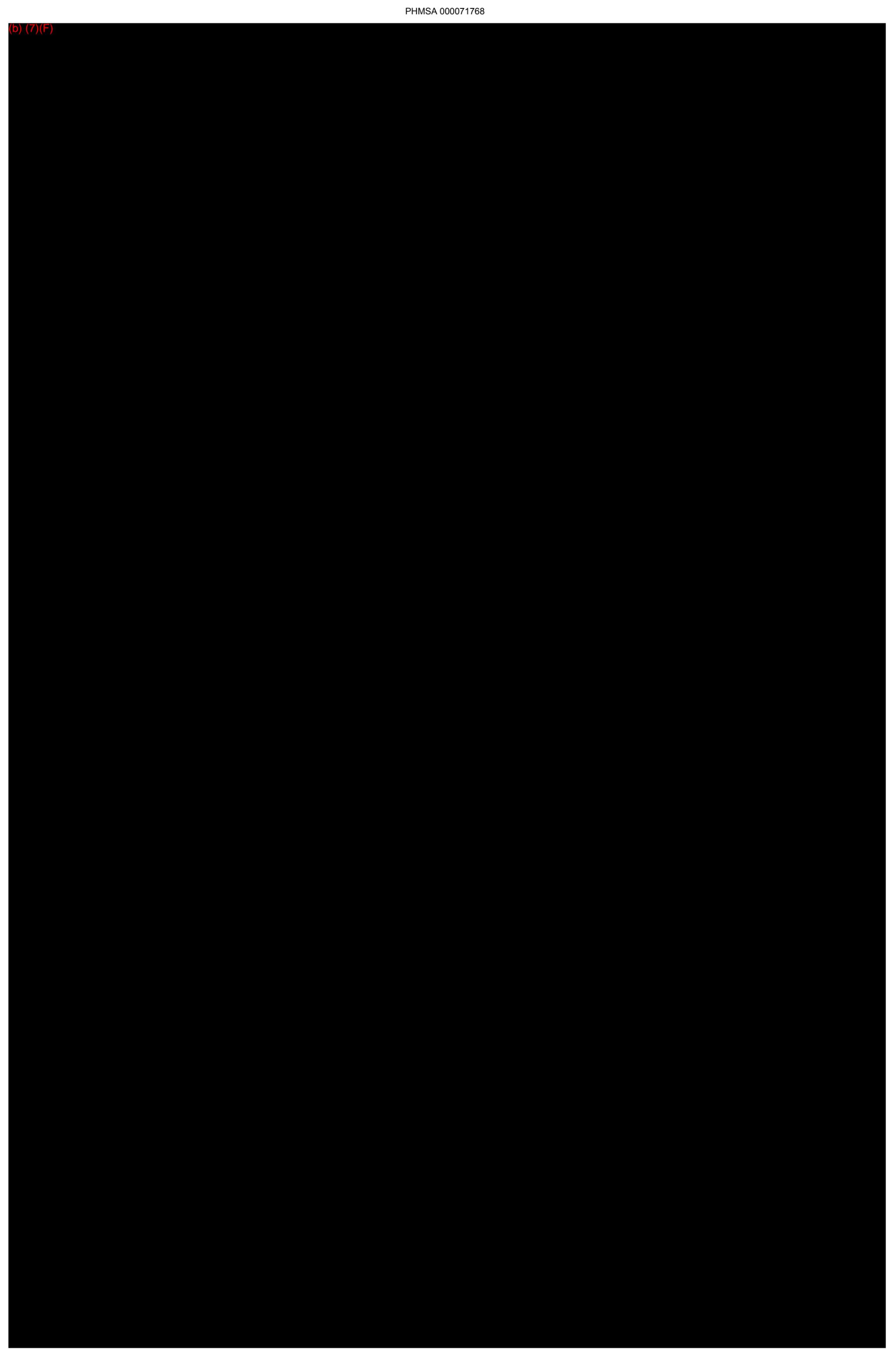
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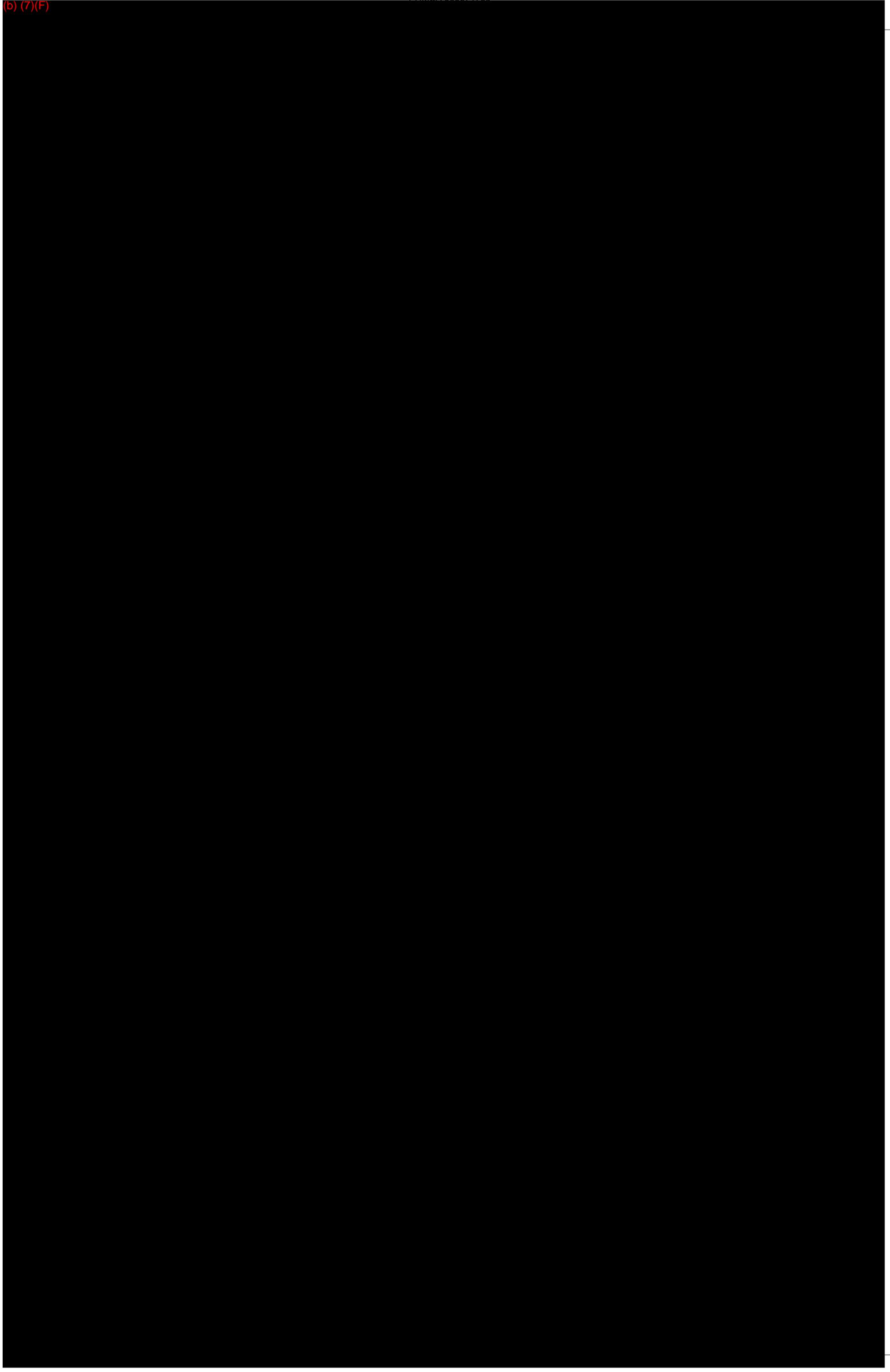
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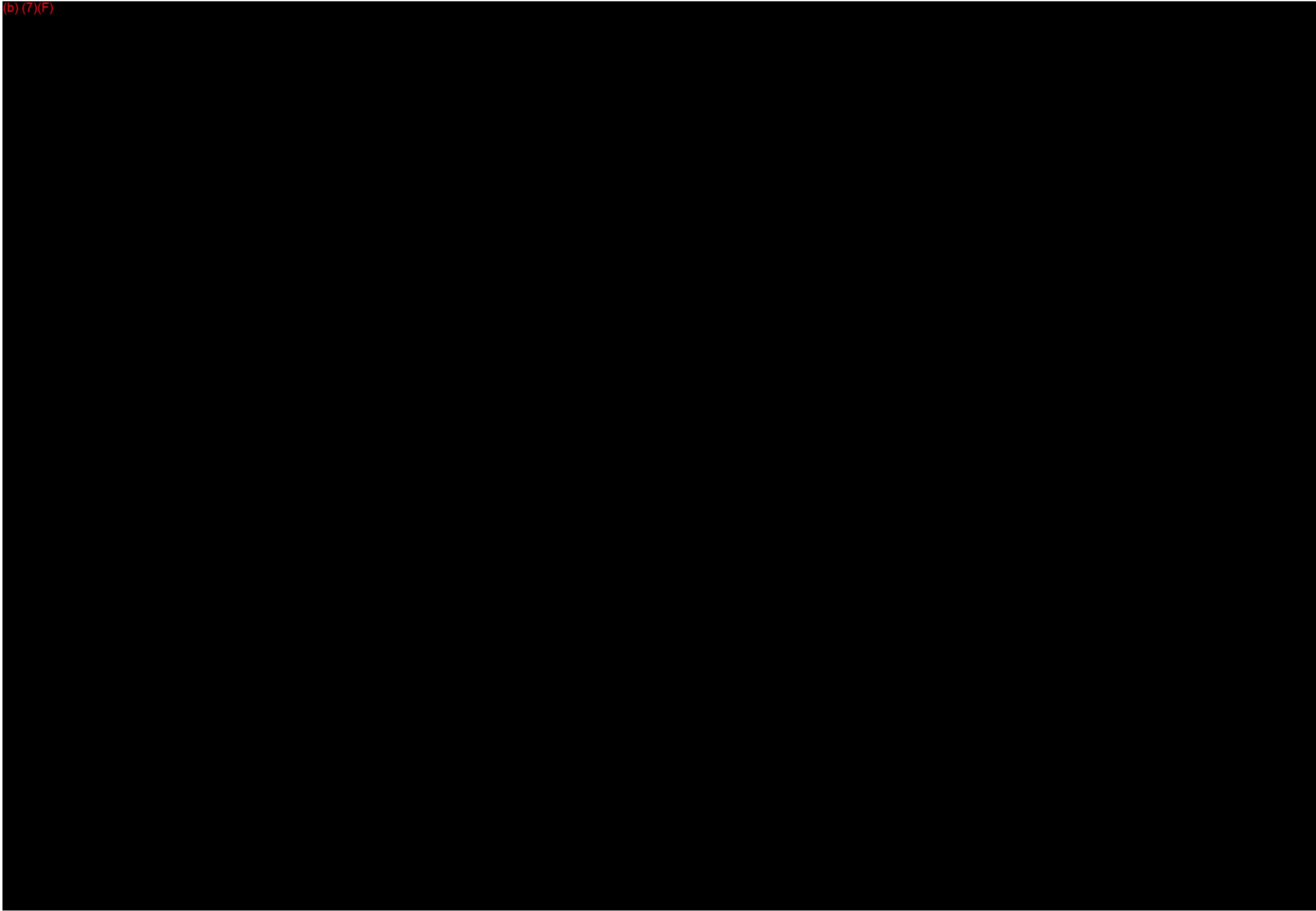
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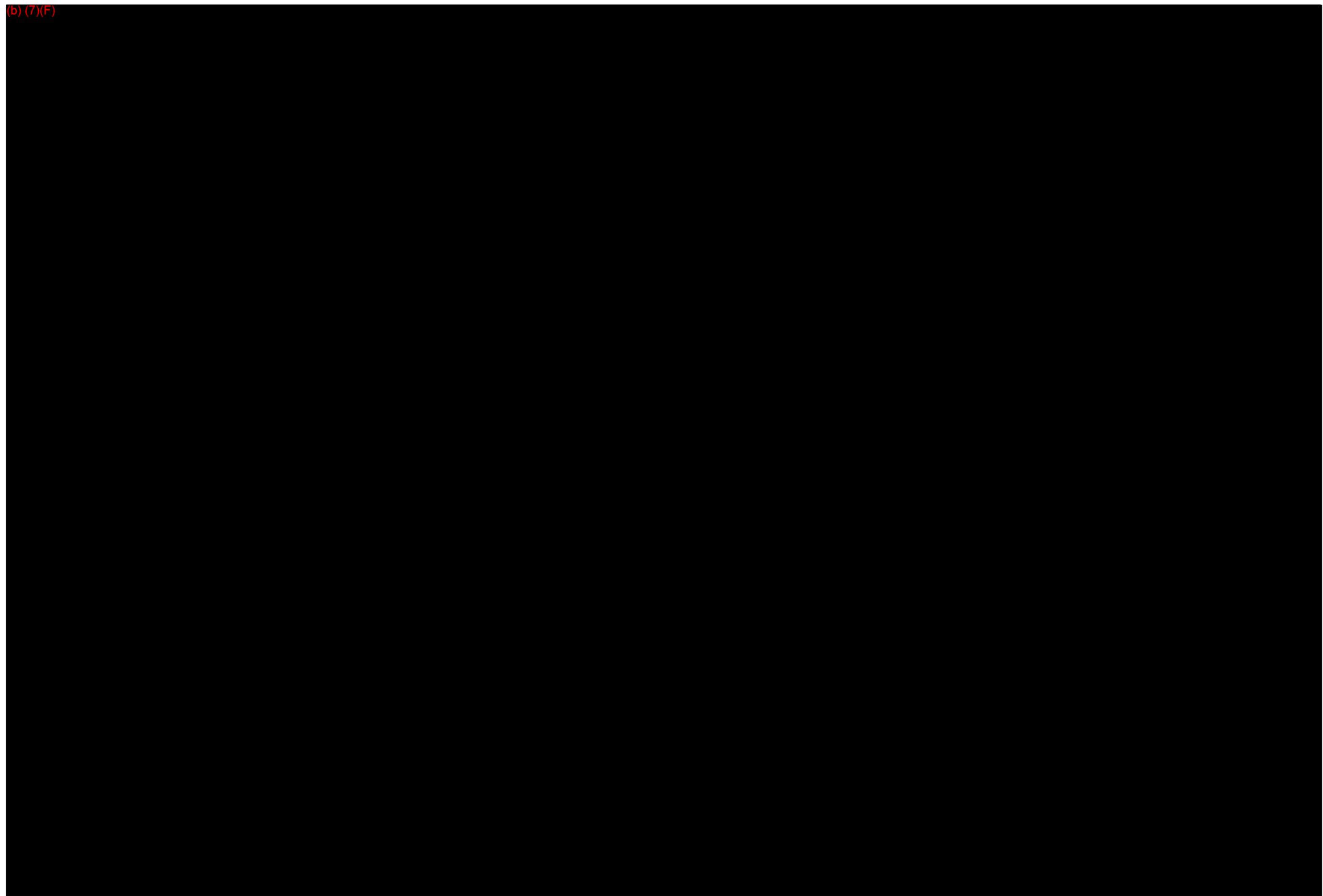
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LEGEND

ENVIRONMENTAL SENSITIVITY INDEX

- MANGROVE MARSH (10D)
- FRESHWATER SWAMPS (10C)
- FRESHWATER MARSHES (10B)
- SALT AND BRACKISH MARSHES (10A)
- SHELTERED TIDAL FLATS (9)
- SHELTERED ROCKY/KARST SHORES (8D)
- SHELTERED SCARPS (8C)
- SHELTERED RIPRAP STRUCTURES (8B)
- SHELTERED SOLID MAN-MADE STRUCTURES (8A)
- EXPOSED TIDAL FLATS (7)
- EXPOSED RIPRAP STRUCTURES (6B)
- GRAVEL OR SHELL BEACHES (6A)
- MIXED SAND AND GRAVEL OR SHELL BEACHES (5)
- COARSE-GRAINED SAND BEACHES (4)
- SCARPS AND STEEP SLOPES IN SAND (3B)
- FINE-GRAINED SAND BEACHES (3A)
- WAVE-CUT CLAY PLATFORMS (2B)
- SCARPS AND STEEP SLOPES IN CLAY (2A)
- EXPOSED WALLS AND OTHER SOLID STRUCTURES (1)

BIOLOGICAL RESOURCES

- DIVING BIRDS
- GULLS/TERNS
- PASSERINE BIRDS
- PELAGIC BIRDS
- RAPTORS
- SHOREBIRDS
- WADING BIRDS
- WATERFOWL
- FISH
- DOLPHINS
- SMALL MAMMALS
- UPLAND/WETLAND PLANTS
- SUBMERGED AQUATIC VEGETATION
- ALLIGATOR
- TURTLES
- OTHER REPTILES/AMPHIBIANS
- BIVALVES
- CRABS
- GASTROPODS
- SHRIMP
- SOLID
- THREATENED/ENDANGERED SPECIES

TRANSPORTATION

- DIVIDED HIGHWAY
- STATE/FEDERAL HIGHWAY
- CITY STREET/COUNTY ROAD
- AIRPORT
- RAILROAD
- SHIP CHANNEL/GULF INTRACOASTAL WATERWAY
- SHIPPING SAFETY FAIRWAY

HUMAN USE FEATURES

- AQUACULTURE SITE
- BEACH ACCESS POINT
- BOAT RAMP
- COAST GUARD STATION
- HELIPOINT
- LIGHTHOUSE
- MARINA
- WATER INTAKE POINT

HYDROGRAPHY

- MARSH, WETLAND
- TIDAL, MUD OR SAND FLATS
- BEACH, BAR
- INTERMITTENT WATER BODY
- DUNES
- SUBMERGED AQUATIC VEGETATION
- MANGROVES
- OYSTERS

OTHER LAYERS

- ANCHORAGE AREA
- AUDUBON SANCTUARY
- BIRD ROOKERY AREA
- CITY OR COUNTY PARK
- COASTAL PRESERVE
- MUNICIPAL AREA
- NATIONAL WILDLIFE REFUGE
- STATE PARK/WILDLIFE MANAGEMENT AREA
- WASHOVER AREA

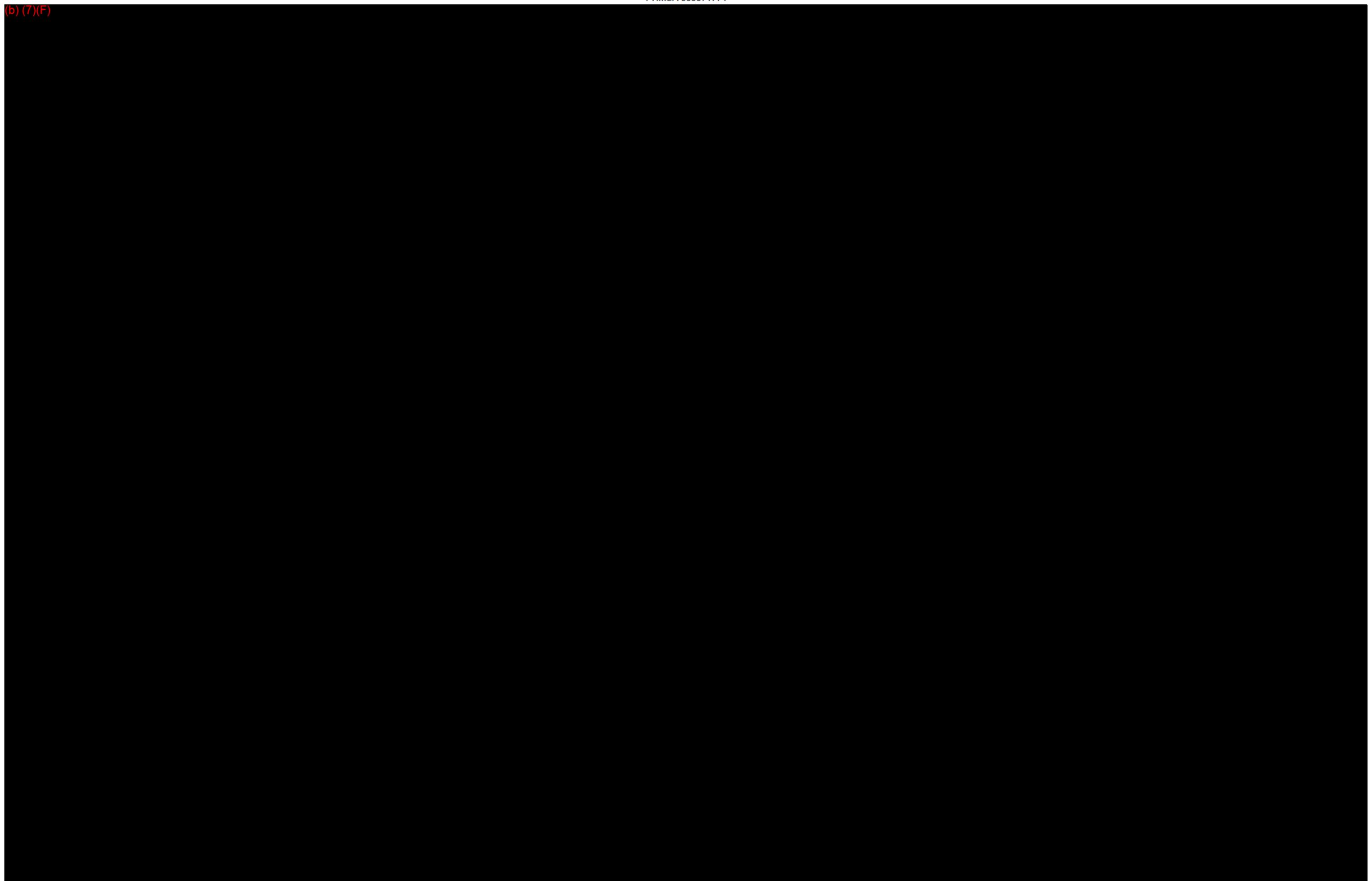
PRIORITY PROTECTION AREAS

- HIGH PRIORITY
- MEDIUM PRIORITY
- LOW PRIORITY

POLITICAL BOUNDARIES

- COUNTY BOUNDARY
- MUNICIPAL BOUNDARY

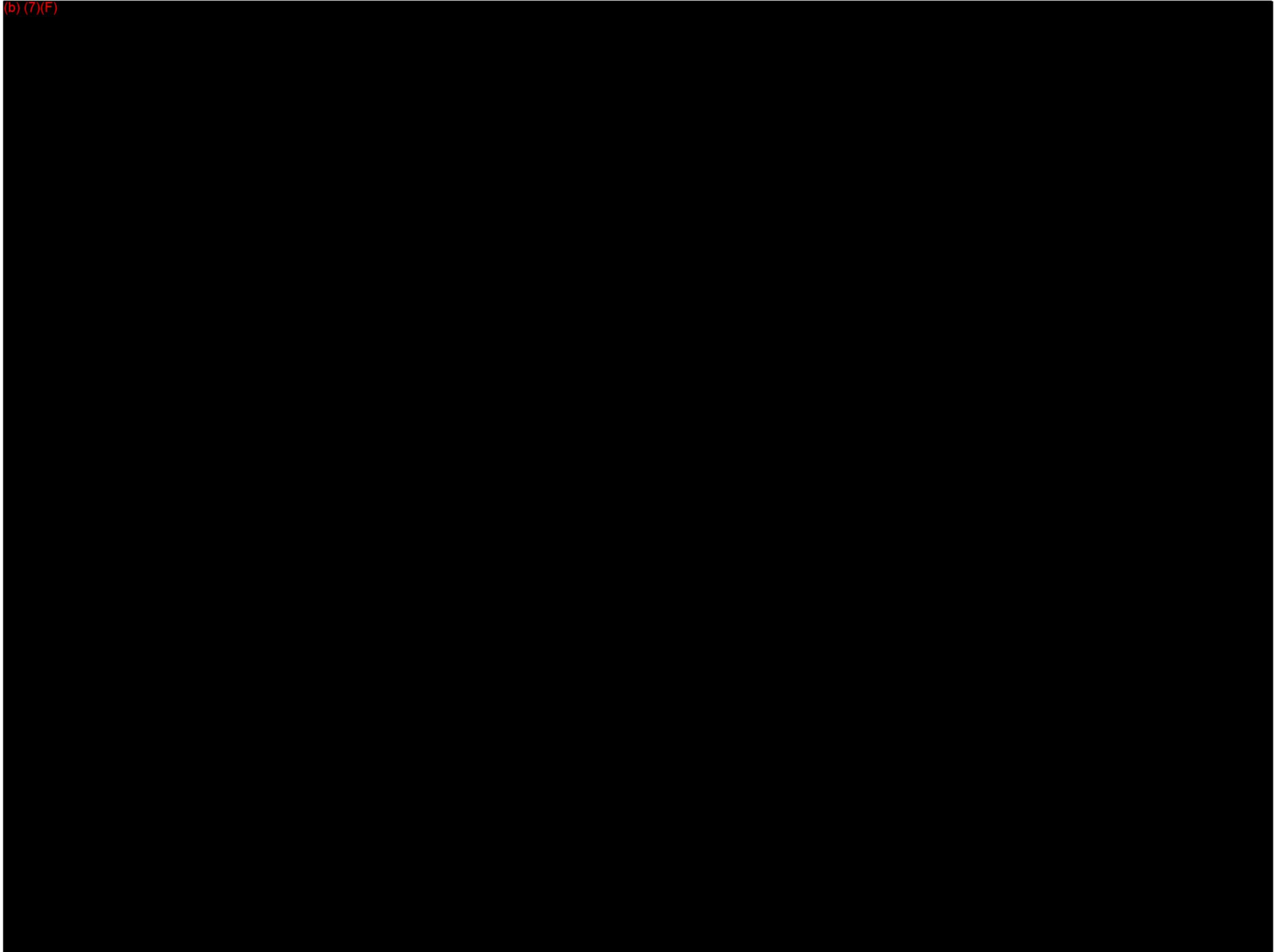
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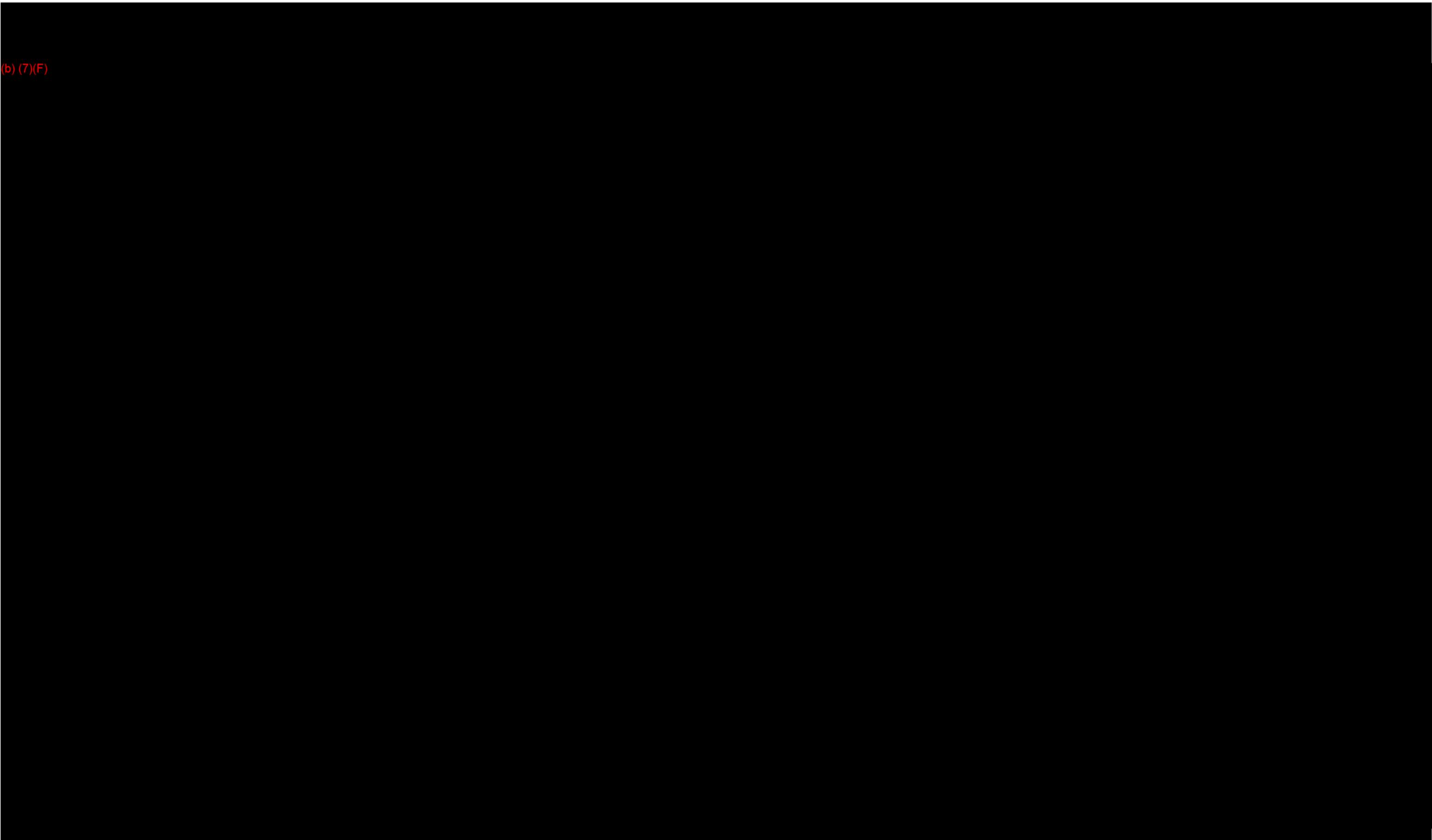
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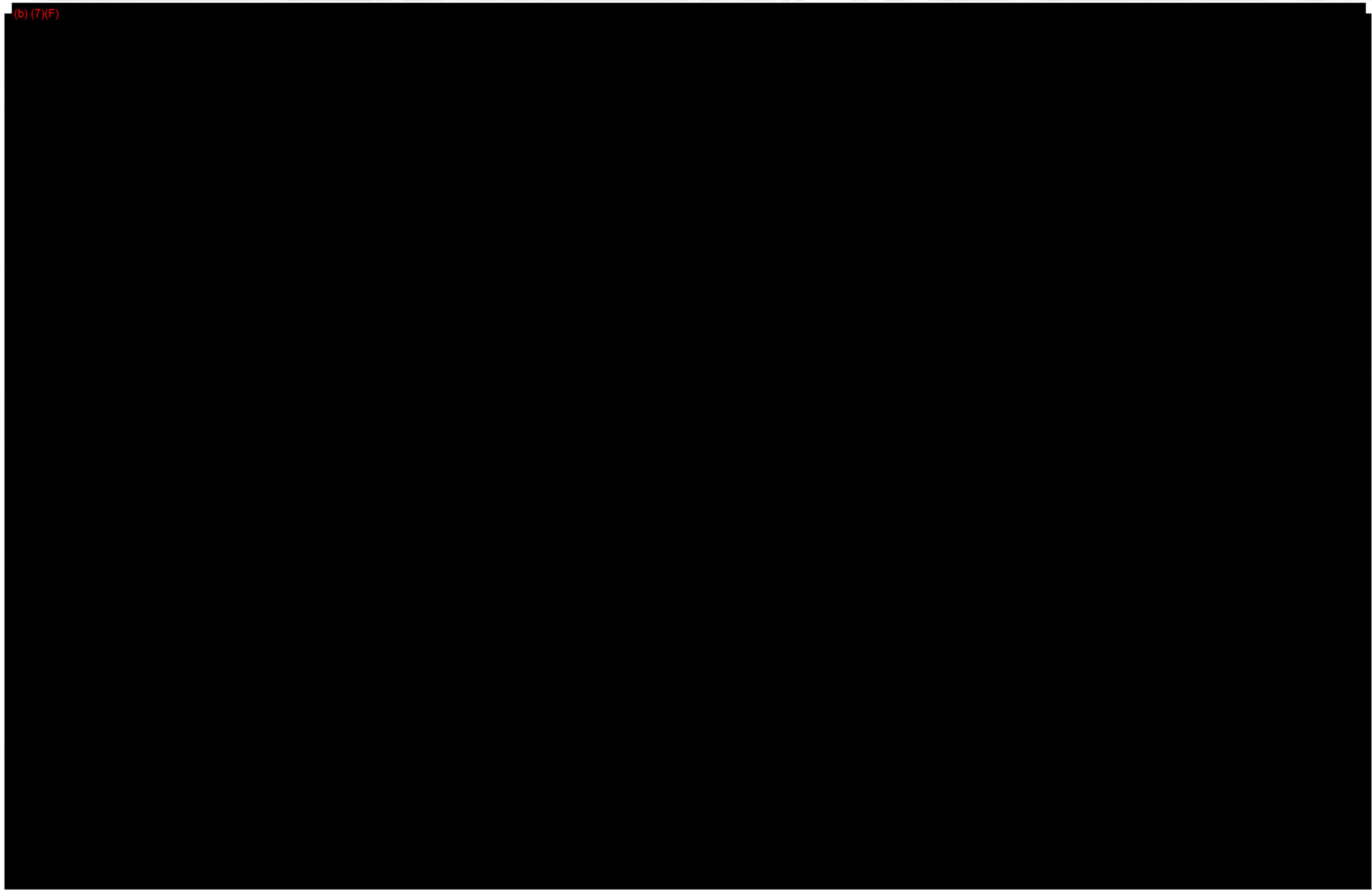


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(b) (7)(F)





(b) (7)(F)

Exhibit to Emergency Environmental Services Agreement

EXHIBIT 12.1.b

ACKNOWLEDGEMENT OF AGREEMENT

This document, when signed and notarized by **Chemical Response & Remediation Contractors, Inc.**, will serve as documentation that **TransMontaigne Operating Company, LP** has secured arrangements for obtaining a response contractor under the Oil Pollution Act of 1990.

Chemical Response & Remediation Contractors, Inc. (CRRC)

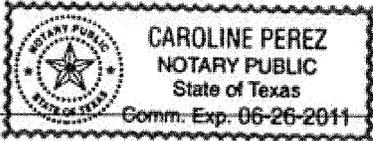
By: David A. Hanawa

Title: President

Signature: David A. Hanawa

Before me the undersigned, a Notary Public for Cameron County, State of Texas, personally appeared David A. Hanawa (for CRRC), and s/he being first duly sworn by me upon his/her oath, says that the facts alleged in the foregoing instrument are true. Signed and sealed this 24th day of September 2009.

(Signature:) Caroline Perez

(SEAL) 

My Commission Expires: 06/26/2011

Note: This agreement constitutes an "evergreen" contract, meaning that (as provided in Items 5 and 11) "it shall continue in force until terminated by either party by giving thirty (30) days' written notice to the other party of such termination..."

(Emergency Services Contract, Sept-09)

Special Services

- ▲ Heavy Equipment Rental (w/operator)
- ▲ Pressure Washing
- ▲ Ozone Treatment

Certificates and Registrations

- ▲ DSHS Asbestos Consultant Agency License (10-0373)
- ▲ DSHS Asbestos Abatement Contractor License (80-0821)
- ▲ DSHS Asbestos Laboratory PCM License (30-0367)
- ▲ DSHS Asbestos Transporter License (40-0333)
- ▲ DSHS Mold Remediation Company License (RCO0107)
- ▲ DSHS Mold Remediation Contractor License (MRC0115)
- ▲ DSHS Mold Assessment Company License (ACO0120)
- ▲ UST Contractor License (CR0000019)
- ▲ TCEQ Solid Waste Registration Number (86580)
- ▲ EPA ID Number (TXR000040014)
- ▲ TGLO Discharge Cleanup Organization Number (03-003)
- ▲ State Of Texas Historically Underutilized Business (HUB) #1742942932100

Insurance Coverage

CRRC maintains the following insurance coverage:

- General Liability..... \$5 million per occurrence/
aggregate
- Professional Liability including Pollution Legal Liability..... \$5 Million per claim/aggregate
- Vehicle \$1 million
- Workers Compensation \$1 million

Part II Equipment and Materials

CRRC maintains a broad inventory of equipment, tools, vehicles, and monitoring equipment dedicated to emergency response.

Vehicles

Vehicle Number	Description	Year	License
1	Ford F350 Crew Cab	1999	3CGS14
2			
3	Chevy C1500 Extended Cab	1997	8MLN50
4	Chevy C3500 Crew Cab	1992	3SSR74
5	Ford F350 Crew Cab Flatbed	2000	4NNW47
6	Ford F-350 Crew Cab	2001	5SVJ75
7			
8	Ford E-350 15 Passenger Van	2002	
9			
10	Ford Ranger	1999	3FPC23
11	Chevy 3500 Crew Cab	2001	9KTK92
12	Ford F150 Extended Cab	2003	
13	Kawasaki Prairie 4 wheeler 4x4	2000	

Response Trailers / Vans

Unit Number	Description	Year	License
312	CM Trailer 32'	1997	89VSYP
309	Wells Cargo 28'	1997	86VPPS
308	Big Tex 24'	1999	57WRKX
310	Boat Trailer (Custom Built)	1998	48WCZJ
307	Boom Trailer (Custom Built)		
306	Pressure Washer Trailer	1999	16WN2M
	18 ½ ft Southwest Gooseneck Car Hauler	2003	
	31 ft Southwest Gooseneck Flatbed Trailer	2003	
	12 ft Big Tex Dump Trailer	2003	
	Boat Trailer (Custom Built)	1998	
	30 ft Magic Tilt Boat Trailer		61WZPX
	28 ½ ft Abasco BB26-8 Crew Boat	1991	6009HN
	Aluminum Flat Bottom Boats		7461JA/7458JA

	Air Compressor Trailer	1966	
	Boom Trailer (Custom Built)		
	28 ft Wells Cargo Trailer	1997	
	Air Compressor "Trailer"	1966	
	John Deere 310 E-4X4 Back Hoe	1997	
	Milwaukee Diamond Coring Machine	2004	
	1-Arc Welder		
	1-Oxygen Acetylene Cutting Rig		
	2-Rae Systems: Multi-Rae Monitors (LEL,O2,H2S,and CO)		
	1-1" Poly Diaphragm Pump	2003	
	3-Stainless Chemical Pumps (Diaphragm)		
	3-Negative Air Machines		
	1-Dehumidifier (Professional Grade)		
	1-Ozone Machine	2004	
	Hepa Vacuums		
	1-Draeger Manuel Gas Detector		
	1-Photo Ionization Detector		
	1-Arti Airborne Particulate Counter		
	1-Sound Level Meter		
	2-Hazcat Kits		
	1-Coleman Powermate Progen 5000 Generator		
	1-Coleman Vertex 7500 Pro. Vertical Generator	2003	
	1-Miller Equipment Tripod Lifeline Hoist		
	1-Campbell Hausfeld Dual Cylinder Air Compressor	2004	
	4-Libra™ Model L-4 Air Sampling Pumps	2004	
	1-Hydro-Thermometer+ InfraRed Thermometer	2004	

Response Vehicle Inventory

VHF radio	Assorted respirator cartridges
Booties	Broom, Street
Brooms, Corn	Butyl Rubber gloves
Cellular telephone	Decon kits
Direct Reading Sample Pump	Drum liners 6 mil.
Full-face respirators	Hand held company radio
Hand tools	Leak repair kit
RAE Systems- Multi-Rae (LEL, O2,H2S and CO)	Neoprene gloves
Nitrile gloves	pH paper
Poly Sheeting (20'x100') roll	PVC coveralls, hooded
PVC gloves	Reference library
S.C.B.A.	Safety glasses
Sample gloves	Sample Jars
Saranex coveralls, hooded	Siphon Pumps (disposable)
Banner tape (Haz-Mat)	Valve wrenches

Response Trailer Inventory

17-E Drum (steel)	17-H Drum (steel)
20' x 100' Poly Sheeting rolls	250 lbs. Soda Ash (7 bags)
300 lbs. Oil Dry absorbent (10 bags)	8" x 10' Sorbent Booms
4H Gloves	Spare Air bottles
85-gallon salvage drum (poly)	95-gallon overpack (poly)
Barricade Encapsulated (Level B)	Breathing air (size J bottles)
Brooms	Bung wrenches
Decon basin	Decon kit
Drum dolly	Drum liners, 6 mil.
Drum sling	Drum wrench
Duct Tape	Electrical extension cord
Eye and Face wash	Fire extinguisher
Flashlights	Gas cans (5 gallon)
Hand Tools (Shovels, etc.)	Hazardous Material banner tape
Latex Booties	Life Guard Responders (Level A)
M2 Pump	Neoprene Gloves No. 9-92
Nitrile Gloves (Solvex)	pH paper, roll or stick
Poly high density sprayer	PVC (Petroflex) gloves No. 12-214 24

Respirators and Cartridges	S.C.B.A.'s (6)
Safety glasses	Sample jar, 4 oz. (glass)
Saranex splash suit (Level C)	Sorbent Pads
Traffic Cones	Trash bags (75 per box)
Trauma kit	Water cooler

Transfer Equipment

Pumps / Compressors

2" Stainless Steel diaphragm pump (2)	2" Aluminum diaphragm pump
2" Trash, gas-operated, pull start (2)	2" Polyethylene diaphragm pump
185 CFM Compressor	Composite Chemical Hose

Patch Tools and Equipment

Assorted pipe wrenches	1/2" & 3/4" drive socket sets
Chlorine A, B, C kits	Assorted pipe tools
Teflon tape	Assorted plugs and patch

Oil Spill Equipment

3 gallon pump sprayers	Absorbent pads
Absorbent boom	Anchor floats and anchors
Absorbent sweep	Corn brooms
Containment boom	Leaf rakes
Leaf blowers	Roll banner tape
Life jackets	Roll trash bags
Roll 500' 3/4" rope	6 mil poly
Roll drum liners	Utility work boats
Scoop shovels	Weed eaters

Sampling Equipment

Haz-Cat Sample Analysis	Area/Personal Air Monitor
Combustible/Oxygen Multiple Gas Detector	Direct Reading Toxic Gas Detector
Photo ionization Detector	Stainless Steel Hand Auger

Miscellaneous Equipment

Coppus Fan/Air Driven Blower	Computers
Confined Space Rescue Equipment	Generator, 10 Kilowatt or less
Pressure Washer – Heated 6,000 PSI	Lights, Quartz Demolition
Radios, hand-held	Phone, Mobile

Materials

Absorbents, All Purpose (Granular)	Absorbents, Boom Oil
Absorbents, Mersorb	Absorbents, Pads Oil
Bags (HazMat), 6 mil Clear	Bags (HazMat), 6 mil Clear (P.E.)
Booties - Latex - XL Overshoe	Boxes, D.O.T. Shipping
Broom (Corn)	Broom (Street)
Brush, Decon	Buckets, 5 gal, D.O.T.
Buckets, Metal Open 5 gal	Cartridge - GME Super Combination
Chemicals - HCl Acid	Chemicals - Degreaser (Mixed Solution)
Chemicals - Muratic Acid	Chemicals - Soda Ash
Chemicals - Sodium Hypochlorite	Cartridge - Mersorb
Decon Pools	Drum, 16 gal Poly Open
Drum, 16 gal Poly Closed	Drum, 30 gal Poly Closed
Drum, 30 gal Poly Open	Drum, 55 gal 17E Steel Closed
Drum, 55 gal 17H Steel Open	Drum, 55 gal Poly Closed
Drum, 55 gal Poly Open Top	Drum, 85 gal Poly Salvage
Drum, 85 gal Steel Salvage	Gloves, Liners
Gloves, Butyl Rubber (11")	Gloves, Neoprene (Neox - 14")
Gloves, Nimble Fingers (Sample)	Gloves, Nitrile
Gloves, Petroflex	Gloves- Raw Hide Leather
Jars - 16 oz.	Jars - 32 oz.
Jars - 4 oz.	Jars - 8-oz./6 oz.
Jars - PCB Wipe	pH Sticks
Plastic Sheeting (8' x 100' x 2 mil.)	Plastic Sheeting (20' x 100' x 6 mil.)
PPE - Chem Boots	PPE - Safety Glasses
PPE - Steel Toe Rubber Boots	Pump, Barrel Siphon
Sample Scoops	Suit - Responder (encapsulated), Level A
Suit - CPF2 (with feet), Level C	Suit - CPF3 (with feet), Level C
Suit - CPF4 (encapsulated), Level B	Suit - CPF1 (without feet), Level C
Suit - Rain Slicker	Tape, Caution (1000')
Suit - Splash (PVC 500)	Suit - Tyvek
Tape, Duct	Tape, Haz Mat (1000')
Tubes, ColiWasa	Tubes, Kitigawa Detector
Vermiculite (6 cu ft bag)	Wipes, Disposable

Exhibit to Emergency Environmental Services Agreement

EXHIBIT 12.1.b

ACKNOWLEDGEMENT OF AGREEMENT

This document, when signed and notarized by Eagle, will serve as documentation that TransMontaigne Transportation Services, Inc. has complied with the preparedness and prevention sections for securing arrangements with a hazardous materials cleanup contractor as outlined in 40 C.F.R. 264.37(a)(1) and (3); 40 C.F.R. 265.37(a)(1) and (3); 29 C.F.R. 1910.120(p)(8)(iii) Exception #2; 1910.120(q)(4); and, secured arrangements for obtaining a response contractor under the Oil Pollution Act of 1990 as identified in F.1 and F.2.

[Eagle]

BY: Marc Walraven

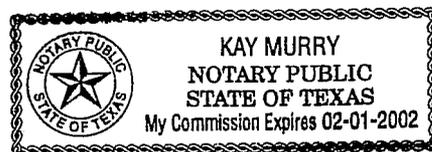
Title: Vice President

Signature: Marc Walraven

Before me the undersigned, a Notary Public for Eastland County, State of Texas, personally appeared Marc W. Walraven (for Eagle), and s/he being first duly sworn by me upon his/her oath, says that the facts alleged in the foregoing instrument are true. Signed and sealed this 28th day of April 1999.

(Signature:) Kay Murry
Kay Murry

(SEAL) Kay Murry



My Commission Expires: 02/01/02

(Emergency Services Contract 11/25/98)

Note: This agreement constitutes an "evergreen" contract, meaning that (as provided in Items 5 and 11) "it shall continue in force until terminated by either party by giving thirty (30) days' written notice to the other party of such termination..."

Exhibit to Emergency Environmental Services Agreement

EXHIBIT 12.1.b

ACKNOWLEDGEMENT OF AGREEMENT

This document, when signed and notarized by **Garner Environmental Services, Inc.**, will serve as documentation that **TransMontaigne Inc.** has secured arrangements for obtaining a response contractor under the Oil Pollution Act of 1990.

Garner Environmental Services, Inc.

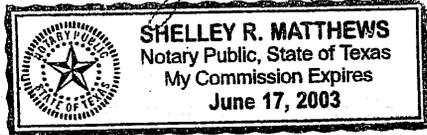
BY: Raymond G. Meyer

Title: Executive Vice President

Signature: Raymond G. Meyer *RM*

Before me the undersigned, a Notary Public for Harris County, State of TEXAS, personally appeared Raymond G. Meyer (for **Garner**), and s/he being first duly sworn by me upon his/her oath, says that the facts alleged in the foregoing instrument are true. Signed and sealed this 20th day of September 1999.

(Signature:) Shelley R. Matthews



(SEAL)

My Commission Expires: June 17, 2003

(Emergency Services Contract 09/13/99r)

Note: This agreement constitutes an "evergreen" contract, meaning that (as provided in Items 5 and 11) "it shall continue in force until terminated by either party by giving thirty (30) days' written notice to the other party of such termination..."

Exhibit to Emergency Environmental Services Agreement

EXHIBIT 12.1.b

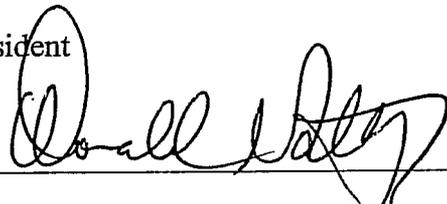
ACKNOWLEDGEMENT OF AGREEMENT

This document, when signed and notarized by Oil Mop, LLC, will serve as documentation that TransMontaigne Inc. has secured arrangements for obtaining a response contractor under the Oil Pollution Act of 1990.

Oil Mop, LLC

BY: Donald Nalty

Title: President

Signature: 

Before me the undersigned, a Notary Public for Orleans Parish County, State of LOUISIANA, personally appeared Donald Nalty (for OMI), and s/he being first duly sworn by me upon his/her oath, says that the facts alleged in the foregoing instrument are true. Signed and sealed this 15 day of November 19 99.

(Signature:) 

RICHARD B. JURISICH, JR.

(SEAL) NOTARY PUBLIC
STATE OF LOUISIANA

My Commission Expires MY COMMISSION IS FOR LIFE.

(Emergency Services Contract 09/24/99rev2)

Note: This agreement constitutes an "evergreen" contract, meaning that (as provided in Items 5 and 11) "it shall continue in force until terminated by either party by giving thirty (30) days' written notice to the other party of such termination..."

Exhibit to Emergency Environmental Services Agreement

EXHIBIT 12.1.b

ACKNOWLEDGEMENT OF AGREEMENT

This document, when signed and notarized by **TAS Environmental Services LP**, will serve as documentation that **TransMontaigne Inc.** has secured arrangements for obtaining a response contractor under the Oil Pollution Act of 1990.

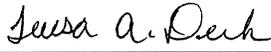
TAS Environmental Services LP (TAS)

By: J. Salzer

Title: President

Signature: 

Before me the undersigned, a Notary Public for Tarrant County, State of Texas, personally appeared J Salzer (for **TAS**), and s/he being first duly sworn by me upon his/her oath, says that the facts alleged in the foregoing instrument are true. Signed and sealed this 20 day of February 2006.

(Signature:) 



Commission Expires: 4-16-06

Note: This agreement constitutes an "evergreen" contract, meaning that (as provided in Items 5 and 11) "it shall continue in force until terminated by either party by giving thirty (30) days' written notice to the other party of such termination..."

(Emergency Services Contract 02/06)

Exhibit to Emergency Environmental Services Agreement

EXHIBIT 12.1.b

ACKNOWLEDGEMENT OF AGREEMENT

This document, when signed and notarized by USES, will serve as documentation that TransMontaigne Inc. has secured arrangements for obtaining a response contractor under the Oil Pollution Act of 1990.

United States Environmental Services, L.L.C.

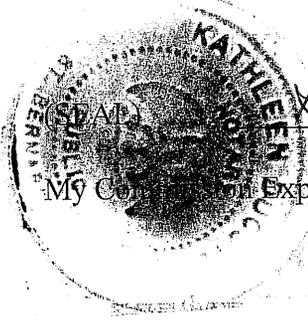
BY: Barry J. Thibodeaux

Title: President and CEO

Signature: Barry J. Thibodeaux

Before me the undersigned, a Notary Public for St. Bernard County, State of Louisiana, personally appeared Barry J. Thibodeaux (for USES), and s/he being first duly sworn by me upon his/her oath, says that the facts alleged in the foregoing instrument are true. Signed and sealed this 15th day of July 20 05

(Signature: Kathleen Klumb)



Kathleen Dwyer 26941

My Commission Expires: For Life

(Emergency Services Contract 06/05)

Note: This agreement constitutes an "evergreen" contract, meaning that (as provided in Items 5 and 11) "it shall continue in force until terminated by either party by giving thirty (30) days' written notice to the other party of such termination..."

Exhibit to Emergency Environmental Services Agreement

EXHIBIT 12.1.b

ACKNOWLEDGEMENT OF AGREEMENT

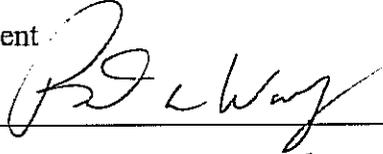
This document, when signed and notarized by **RM Walsdorf, Inc.**, will serve as documentation that **TransMontaigne Inc.** has complied with the preparedness and prevention sections for securing arrangements with a hazardous materials cleanup contractor as outlined in 40 C.F.R. 264.37(a)(1) and (3); 40 C.F.R. 265.37(a)(1) and (3); 29 C.F.R. 1910.120(p)(8)(iii) Exception #2; 1910.120(q)(4); and, secured arrangements for obtaining a response contractor under the Oil Pollution Act of 1990 as identified in F.1 and F.2.

RM Walsdorf, Inc.

BY: Robert M. Walsdorf

Title: President

Signature: _____

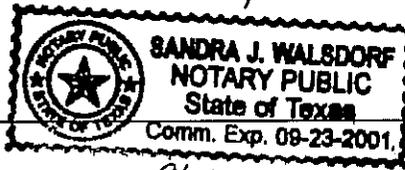


Before me the undersigned, a Notary Public for CAMERON County, State of TEXAS, personally appeared ROBERT M. WALSDORF (for **Walsdorf**), and s/he being first duly sworn by me upon his/her oath, says that the facts alleged in the foregoing instrument are true. Signed and sealed this 22nd day of SEPTEMBER 1999.

(Signature:)



(SEAL)



My Commission Expires:

9/23-01

(Emergency Services Contract 6/18/99)



RM Walsdorf, Inc

10155 SH 48

Brownsville, TX 78521

P(956) 831-3984 F(956) 831-4923

November 7, 2008

TransMontaigne, Inc.
10150 Old Highway 48
Brownsville Texas, 78521

RE: Spill Response Equipment Letter

To Whom It May Concern:

The following is a list of spills response equipment and materials currently maintained by R.M. Walsdorf, Inc. This equipment is located at our business address.

Sorbents

500 Ft. – 3M sorbent
Absorbent Pads – 20 packs of 200 each

Boom Equipment Including

1500 Ft. - 18" float
500 Ft. -19" Sweep Boom
1000 Ft. – Sausage Boom

Skimmer Equipment

Skim-pak – 4000 gal/hr capacity
Vacuum Truck

Anchor System

Heavy equipment

Diaphragm pumps, Vacuum pumps, hoses, and overpack drums

Trailer

Boats

16 Ft. Dart Boat/Motor/Trailer
18 Ft. Shallowport Boat/Motor/Trailer

Sincerely,

Kimberly Walsdorf, SVP



**Brownsville Terminal Complex
Emergency Response Action Plan**

Developed by:



SECTION 1

INTRODUCTION

Figure 1-1 - Record of Changes

Figure 1-2 - Distribution List

Figure 1-3 - Information Summary (QI List)

Figure 1-4 - Response Zone Map

Figure 1-5 - Pipeline System Overview Map

Figure 1-6 - Facility Area Map

Figure 1-7 - Facility Location Map

Figure 1-8 - Plot Plan

1.1 Purpose / Scope of Plan

1.2 Plan Review and Update Procedure

1.3 Certification of Adequate Resources

1.4 Agency Submittal / Approval Letters

**Brownsville Terminal
Complex - ERAP**

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FIGURE 1-1 - RECORD OF CHANGES

Changes to this Plan will be documented on this page. Plan review and modifications will be initiated and coordinated by the Environmental, Safety, and Occupational Health Department (ESOH).

CHANGE NUMBER	DATE OF CHANGE	DESCRIPTION OF CHANGE
0	1/20/2005	New Issue- Conversion of existing ICP to web-based ICP format (intitial submission)
1	2/3/2005	Updated M. Helmke's address (Figure 1-3, Section 1, ERAP & ICP)
2	8/31/2005	Added USCG approval letter. Updated USCG FRP Control Number (Section 1, Fig. 1-3; ERAP & ICP)
3	1/30/2006	Annual plan review - see revisions noted below.
3	1/30/2006	Added information regarding applicable ACP's (Section 1, ERAP & ICP); added addresses for listed OSRO's (Section 7 & Appendix B)
3	1/30/2006	Specified QI authority to activate & contract with OSRO's (Section 4, ERAP & ICP)
4	7/28/2006	Specified 5-year review period (from date of last DOT/RSPA approval). Specified "change in emergency response procedures" as condition requiring revision/submission for DOT/RSPA purposes. [Section 1.2, ERAP & ICP]
4	7/28/2006	Minor corrections/additions to "Spill Detection" discussion. [Appendix D, D.1.1]
5	1/30/2007	Annual plan review - no revisions necessary at time.
6	1/30/2008	Annual plan review - no revisions necessary at time. See revisions noted below (through remainder of year).
7	3/24/2008	Misc. updates to external contacts information [Figure 3.4-1, ERAP & ICP]; Updates to tankage contents [Apps. D & E].
8	10/6/2008	Added language identifying response resources for fighting vegetable oil fires (Figure 1-3; ERAP & ICP).
9	1/30/2009	Annual plan review - no revisions necessary at time. See revisions noted below (through remainder of year).
10	9/28/2009	Added contract/equipment data for new response contractor- CRRC [Appendix B].
11	1/20/2010	Annual plan review - see revisions noted below.
11	1/20/2010	Personnel updates (replaced Helmke w/Leubke) [Figs.

		1-3, 3.4-1; ERAP & ICP]
11	1/20/2010	Updated tankage tables to reflect addition of Tk 1019 [Apps. D & E]
11	1/20/2010	Updated facility diagrams to reflect tankage additions, etc. [Figs. 1-6, 2.6-2, & Drainage]
12	8/17/2010	Personnel updates (added Lubbers); updated Storage Tank Information [Figs. 1-3 & 3.4-1, ERAP & ICP; Apps D & E, ICP]
13	11/15/2010	Five-year resubmittal to USCG [all changes since initial submittal]

**Brownsville Terminal
Complex - ERAP**

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FIGURE 1-1 - RECORD OF CHANGES

Changes to this Plan will be documented on this page. Plan review and modifications will be initiated and coordinated by the Environmental, Safety, and Occupational Health Department (ESOH).

CHANGE NUMBER	DATE OF CHANGE	DESCRIPTION OF CHANGE
14	2/3/2011	Annual plan review. Added aerial surveillance resources to external contacts information [Figure 3.4-1, ERAP & ICP]
15	7/20/2011	Numerous (minor) updates/additions/corrections, in response to USCG review-letter of 4/21/11:
15	7/20/2011	Added "simultaneous vessel transfer" info. to facility description [Fig. 1-3, ERAP & ICP]
15	7/20/2011	Modified external contacts listing to show Miller Environmental under "Other Service Providers" [Fig. 3.4-1, ERAP & ICP]
15	7/20/2011	Enhanced listing of QI responsibilities [Sect. 4, ERAP & ICP]
15	7/20/2011	Enhanced location description for facility response supplies; removed Miller Environmental from OSRO listing [Sect.5, ERAP]
15	7/20/2011	Enhanced location description for facility response supplies; removed Miller Environmental from OSRO listing [Sect. 7, ICP]
15	7/20/2011	Removed Miller Environmental from OSRO listing [App. B, ICP]
15	7/20/2011	Corrected MMPD calculation/figure [App. D, ICP]
15	7/20/2011	Corrected minor inaccuracies in Cross Refr. section [App. F, ICP]
15	7/20/2011	Added USCG/EPA jurisdictional interface valves to

		facility diagrams [Figs. 1-8, ERAP & ICP]
16	7/26/2011	Personnel updates (replaced Tefertiller with Everett) [Figs. 1-3 & 3.4-1, ERAP & ICP]
17	9/16/2011	Update & recertification of SPCC Plan [App. E]
18	10/11/2011	Misc. updates to product/tankage listings [Fig. D-1, App. E]
19	11/3/2011	Added restrictive language regarding dispersant usage [Sect. 6, Fig. 6.3-2]
20	5/22/2013	Personnel changes [removed N. Everett, added A. Sanchez Jr, updated address & phone of C. Arizmendi; Figs 1-3 & 3.4-1, ICP & ERAP]
21	7/1/2013	Misc. updates to product/tankage listings [Fig. D-1, App. E]
22	1/9/2014	Personnel updates (removed A. Sanchez & J. Zamora, added M. Casas; updated title of C. Arizmendi); various updates to External Notifications [Fig. 1-3 & 3.4-1, ICP & ERAP]
23	1/16/2014	Various technical updates & revisions, requested by PHMSA via letter of 12/30/13. [Figs. 1-3 & 3.4-1, Sects. 1.2 & 6.4, App. B]

**Brownsville Terminal
Complex - ERAP**

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FIGURE 1-2 - DISTRIBUTION LIST

PLAN HOLDER	ADDRESS	NUMBER OF COPIES	DISTRIBUTION DATE
ESOH / Operations	200 Mansell Court East, Suite 600 Roswell, GA 30076	1	November 2010
Facility [1 ICP + 7 ERAPs]	10150 State Highway 48 Brownsville, TX 78521	7	November 2010
EPA (Region VI)- [6SF-RP] Sr. On-Scene Coordinator [on-line access]	1445 Ross Avenue Dallas, TX 75202-2733	1	November 2010
USCG- MSD Brownsville	1801 Capt. Don L. Faust Rd. Brownsville, TX 78521	1	November 2010
Deputy Port Director (ERAP only)	Brownsville Navigation District 1000 Foust Road Brownsville, TX 78521	1	November 2010
US DOT (Office of Pipeline Safety)- Response Plans Officer	400 Seventh St, SW, Room 7128 Washington, D.C. 20590	2	November 2010

[CD ROM]

**Brownsville Terminal
Complex - ERAP**

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FIGURE 1-3 - INFORMATION SUMMARY (QI LIST)

Owner/Operator:	TransMontaigne Operating Co. L.P. 200 Mansell Court East, Suite 600 Roswell, GA 30076
Facility Name:	Brownsville Terminal Complex
Facility Mailing Address:	10150 State Highway 48 (Main Office) Brownsville, Texas 78521
Facility Latitude/Longitude:	(b) (7)(F)
Facility Telephone/Fax:	(956) 831-3531/ (956) 831-0448
Agency Plan Identification Numbers:	EPA -FRP-06-TX-00031, 00072, 00134, 00624, 00285 USCG -BRNDWF26 DOT -1621
Description of Facility:	<p>This Facility is a ?Complex Facility,? consisting of five (5) terminal areas occupying property along the north and south sides of the Brownsville Ship Channel. There are product lines connecting the tank farms to various docks on the Channel. In addition, there is the 17.44 mile, 10-inch Frontera Pipeline (constructed in 2003) from the Rio Grande/U.S.-Mexico border into the 3203-3206 series tank farm on the North side of the channel.</p> <p>All improvements (with the exception of dock structures) are owned by TransMontaigne, with the land being leased from the Brownsville Navigation District.</p> <p>The Facility has a total storage capacity (b) (7)(F), with an average storage volume of (b) (7)(F). The facility has a total of 103 bulk liquid storage tanks, & products may be received by and/or delivered to ship, barge, pipeline, truck, and rail car. Marine transfers may occur simultaneously with up to seven (7) vessels, across five (5) different dock areas.</p> <p>Products handled include: Heavy Oils, Lube Oils, Distillate Fuels, Gasolines, Toluene, Asphalts, Vegetable Oils, Animal Fats/Oils, Waxes, Methylene Chloride, Glycols, Naphthas/Solvents, Hexanes/Alcohols, Acids/Peroxides, Latex Note: Material Safety Data Sheets (MSDS) are maintained separately at the Facility (Main Office).</p> <p>Since this Facility periodically handles vegetable oils & animal fats, local personnel have had detailed conversations with the Brownsville Fire Dept. regarding their fire-fighting capabilities. Fire Dept. personnel are very confident in their resources (equipment, supplies,</p>

	personnel, & training) for responding to fires involving vegetable oils & animal fats. Substantial expansions consisting primarily of additional tankage are listed in Fig. D-1.
Driving Directions:	From the intersection of Highways 511 and 48, proceed east on old Highway 48, into the Port. Main office is located on the right (north side of Ship Channel), approximately two (2) miles from Highway 511.

**Brownsville Terminal
Complex - ERAP**

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FIGURE 1-3 - INFORMATION SUMMARY (QI LIST), CONTINUED

Qualified Individuals or Alternate: PRIMARY ALTERNATES (Refer to APPENDIX A, FIGURE A.2-3 for QI Training) (Refer SECTION 4.5 for QI Responsibilities Authorities) *24 Hour	Kevin Garcia General Manager- Brownsville TX (956) 831-3531 (Office) (b) (6) (956) 371-3916* (Mobile)	1840 Illinois Avenue Brownsville, TX 78521
	Carlos Arizmendi Operations Manager- Brownsville TX (956) 831-3531 (Office) (956) 592-1660* (Mobile)	31445 FM3069 Bayview, TX 78566
	Melchor "Malcom" Casas Area Safety Coordinator (956) 554-4036 (Office) (b) (6) (956) 371-7748* (Mobile)	922 S. Palm Blvd. Harlingen, Texas 78552
	Andy McClish Manager, Reg. Compliance- Atlanta Office (770) 518-3701 (Office) (b) (6) (678) 488-4524* (Mobile)	5237 Forest Brook Parkway Marietta, GA 30068
	Brian Temples Director, Safety- Atlanta Office (770) 518-3756 (Office) (706) 252-0282* (Mobile)	315 Ervin Coker Road Rome, GA 30161
	Tommy Jordan Director, Operations- Atlanta Office (770) 518-3588 (Office) (b) (6) (678) 427-9325* (Mobile)	11075 Pennbrook Crossing Duluth, GA 30097
	Steve McNelly General Mgr., Operations- Atlanta Office (770) 518-3753 (Office)	3580 Willow Wind Court Loganville, GA 30052

(b) (6)	
(678) 910-1510* (Mobile)	
Dudley Tarlton Vice President, ESOH- Denver Office (303) 626-8200 [8219] (Office)	5405 South Niagara Court Greenwood Village, CO 80111
(b) (6)	
(720) 308-8596* (Mobile)	
Greg Pound President, C.O.O. - Atlanta Office (770) 518-3707 (Office)	3032 Oaktree Landing NE Marietta, GA 30068
(b) (6)	
(404) 386-5426* (Mobile)	

**Brownsville Terminal
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FIGURE 1-3 - INFORMATION SUMMARY (QI LIST), CONTINUED

Pipeline Response Zone Consists of the Following Counties:	Cameron County					
Pipeline Sections/ Products Handled: (Refer to Product Characteristic and Hazards, FIGURE D-7)	Section	Diameter		Product		
	Frontera	10 in.		Refined Petroleum Products		
Facility Data: (See APPENDIX D-1 for date and type of substantial expansion)	Facility	Location (Address and County)	Hours of Operations/ Manned	*Throughput (bbls per day)	Date of Startup	Wellhead Protection Area
	Brownsville Terminal Complex	Cameron County 10150 State Highway 48 (Main Office) Brownsville, Texas 78521	24 hours/day; 7 days/week	20,000 - 25,000	1986	No Impact
Alignment Maps: (Piping, Plan Profiles)	Located in Main Complex Office and in Atlanta Office					

PHMSA Worst Case Discharge:	(b) (7)(F)
Spill Detection and Mitigation Procedures:	Refer to SECTION 2 .
Statement of Significant and Substantial Harm:	The response zones in this system all contain pipelines greater than 6 5/8 inches and are longer than ten miles. At least one section of pipeline in each response zone crosses a major waterway or comes within five miles of a public drinking water intake. Therefore, in accordance with 49 CFR 194.103(c), each entire response zone described in this Plan will be treated as if expected to cause significant and substantial harm.
Date Prepared:	Jan., 2005; Nov. 2010

*The rate of flow from the pipeline system to tankage and the filling rates of the trucks are essentially fixed, and not a function of daily throughput. Thus, changes in daily throughput would have no effect on potential discharge volumes. The Facility has sufficient tank volume to handle any potential increase in pipeline throughput (from the dock) and the truck rack has sufficient capability to handle any potential increase in transfer capacity.

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

Note: For further information on the training and qualifications of Qualified Individuals, refer to **SECTION 4.5** and **APPENDIX A.2** in this Plan.

Brownsville Terminal Complex - ERAP

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FIGURE 1-4 - RESPONSE ZONE MAP

[Click here to view Brownsville Terminal Complex Response Zone Map FIGURE 1-4](#)

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FIGURE 1-5 - PIPELINE SYSTEM OVERVIEW MAP

[Click here to view Brownsville Terminal Complex Pipeline System Overview Map FIGURE 1-5](#)

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FIGURE 1-6 - FACILITY AREA MAP

[Click here to view Brownsville Terminal Complex Area Map FIGURE 1-6](#)

Brownsville Terminal

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FIGURE 1-7 - FACILITY LOCATION MAP

[Click here to view Brownsville Terminal Complex Location Map FIGURE 1-7](#)

**Brownsville Terminal
Complex - ERAP**

September 2004

© Technical Response Planning
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[Click here to view Brownsville Terminal Complex Plot Plan FIGURE 1-8a](#)

[Click here to view Brownsville Terminal Complex Plot Plan FIGURE 1-8b](#)

[Click here to view Brownsville Terminal Complex Plot Plan FIGURE 1-8c](#)

[Click here to view Brownsville Terminal Complex Plot Plan FIGURE 1-8d](#)

[Click here to view Brownsville Terminal Complex Plot Plan FIGURE 1-8e](#)

[Click here to view Brownsville Terminal Complex Plot Plan FIGURE 1-8f](#)

[Click here to view Brownsville Terminal Complex Plot Plan FIGURE 1-8g](#)

[Click here to view Brownsville Terminal Complex Plot Plan FIGURE 1-8h](#)

[Click here to view Brownsville Terminal Complex Plot Plan FIGURE 1-8i](#)

[Click here to view Brownsville Terminal Complex Plot Plan FIGURE 1-8j](#)

[Click here to view Brownsville Terminal Complex Plot Plan DOCK LINES/ USCG VALVES](#)

**Brownsville Terminal
Complex - ERAP**

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© Technical Response Planning
Corporation 2004**1.1 PURPOSE / SCOPE OF PLAN**

The purpose of this Integrated Contingency Plan (ICP) is to provide guidelines to quickly, safely, and effectively respond to an emergency at the Brownsville Terminal Complex and associated pipeline system. The facilities and associated pipelines owned and operated by TransMontaigne Operating Co. L.P., are herein referred to as "Company."

This Plan is intended to satisfy the requirements of the Oil Pollution Act of 1990 (OPA 90), and has been prepared in accordance with the National Oil and Hazardous Substances Pollution Contingency Plan (NCP) and applicable Area Contingency Plans (ACP), EPA Region (EPA Region 6) Regional Contingency Plan, and its South Texas Coastal Zone ACP, MSO Corpus Christi (GRP's) in the One Gulf Plan Sub-Area Emergency Response Action Plan. 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)
- US Environmental Protection Agency (EPA) requirements for an OPA 90 plan (40 CFR 112.20)
- EPA requirements for a Spill Prevention Control and Countermeasures (SPCC) Plan (40 CFR 112.7)
- US Coast Guard (USCG) requirements for an OPA 90 Plan (33 CFR Part 154)

- Occupational Safety and Health Administration (OSHA) requirements for Emergency Action Plans (EAP and ERP) (29 CFR 1910)

**Brownsville Terminal
Complex - ERAP**

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1.2 PLAN REVIEW AND UPDATE PROCEDURE

The ESOH Department will coordinate the following plan review and update procedures with regional and local Management.

In accordance with 49 CFR Part 194.121 and 40 CFR 112.20, this Plan will be reviewed annually and modified to address new or different operating conditions or information included in the Plan. In the event that the Company experiences a Worst Case Discharge the effectiveness of the plan will be evaluated and updated as necessary.

Upon review of the response plan for each five-year period, the plan will be submitted to PHMSA prior to 5 years from the last approval date.

If new information or different operating conditions would substantially effect 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. EPA must receive the changes within 60 days.

The US Coast Guard (USCG) requires that plan changes be submitted in a timely manner to the MSO. The plan review must occur within one (1) month of the anniversary date of the USCG approval letter. If no changes are required, the facility shall submit a letter to the USCG stating "No Changes Required."

Examples of changes in operating conditions that would cause a significant change to the Plan include:

CONDITIONS REQUIRING REVISIONS AND SUBMISSIONS	EPA	DOT	USCG
Relocation or replacement of the transportation system in a way that substantially effects the information included in the Plan, such as a change to the Worst Case Discharge volume.	X	X	
A change in the Facility's configuration that materially alters the information included in the Plan.	X		X
A change in the type of oil handled, stored, or transferred that materially alters the required response resources.	X	X	X
A change in key personnel (Qualified Individuals).	X	X	
A change in the name of the Oil Spill Removal Organization (OSRO).		X	X
Material change in capabilities of the Oil Spill Removal Organization(s) (OSROs) that provide equipment and personnel.	X		
Material change in the Facility's spill prevention and response equipment or emergency response procedures.	X	X	X
Any other changes that materially affect the implementation of	X	X	X

the Plan.			
A change in the NCP or ACP that has significant impact on the equipment appropriate for response activities.		X	
A change in the Facility's operating area that includes ports or geographic area.			X

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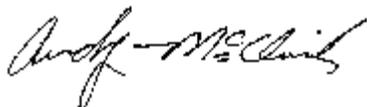
1.3 CERTIFICATION OF ADEQUATE RESOURCES

CERTIFICATION

Pursuant to the Clean Water Act Section 311(j)(5)(F)

TransMontaigne Operating Co. L.P.

TransMontaigne Operating Co. L.P., hereby certifies to the Pipeline and Hazardous Materials Safety Administration of the Department of Transportation that they have 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.



Andy McClish
Manager, Regulatory Compliance

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1.4 AGENCY SUBMITTAL / APPROVAL LETTERS

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DOT APPROVAL LETTERS

(Insert Here)

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DOT APPROVAL LETTERS, CONTINUED

(Insert Here)

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EPA APPROVAL LETTERS

(Insert Here)

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EPA APPROVAL LETTERS, CONTINUED

(Insert Here)

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USCG APPROVAL LETTERS

(Insert Here)

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USCG APPROVAL LETTERS, CONTINUED

(Insert Here)

SECTION 2

INITIAL RESPONSE ACTIONS

Figure 2-1 - Emergency Reporting and Facility Alarms

Figure 2-2 - Initial Response Flowchart

Figure 2-3 - Initial Response Action Checklist

2.1 Spill Response

Figure 2.1-1 - Spill Response Action Checklist

2.1.1 Spill Detection and Mitigation Procedures

Figure 2.1-2 - Spill Mitigation Procedures

2.1.2 Spill Surveillance Guidelines

Figure 2.1-3 - Oil Spill Surveillance Checklist

2.1.3 Spill Volume Estimating

Figure 2.1-4 - Spill Estimation Factors

2.1.4 Estimating Spill Trajectories

2.1.5 Initial Containment Actions

2.1.6 Safety Considerations

2.2 Fire / Explosion / Vapor Release

2.2.1 Fire, Explosion, and Vapor Release Response Actions

2.2.2 Fire Fighting Tactics

2.2.3 BLEVE - Boiling Liquid Expanding Vapor Explosion

2.3 Medical Emergency / Personal Injury

**2.3.1 Medical Emergency / Personal Injury Response
Actions**

2.4 Natural Disaster / Severe Weather

2.4.1 Earthquake Procedure

SECTION 2

INITIAL RESPONSE ACTIONS, CONTINUED

2.4.2 Flooding Procedure

2.4.3 Hurricane Procedure

2.4.4 Tornado Procedure

2.5 Security Related Incidents

2.5.1 Threats to Personnel and Facilities

2.5.2 Criminal Acts / Workplace Violence

2.5.3 Sabotage / Bomb Threat / Suspicious Package

2.5.4 Threat Receipt Precautions

Figure 2.5-1 - Threat Documentation Report Form

2.6 Evacuation

2.6.1 Evacuation Alarm

2.6.2 Critical Operations and Initial Response Actions

2.6.3 Protection Options - Evacuation vs. Shelter In Place

2.6.4 Evacuation Routes

2.6.5 Shelter and Evacuation Muster Point Locations

2.6.6 Personnel Accountability

2.6.7 Shelter In Place Guidelines

2.6.8 Public Protective Measures

Figure 2.6-1 - Evacuation Procedure Checklist

Figure 2.6-2 - Facility Shelter and Evacuation Muster Point Plot Plan

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FIGURE 2-1 - EMERGENCY REPORTING AND FACILITY ALARMS

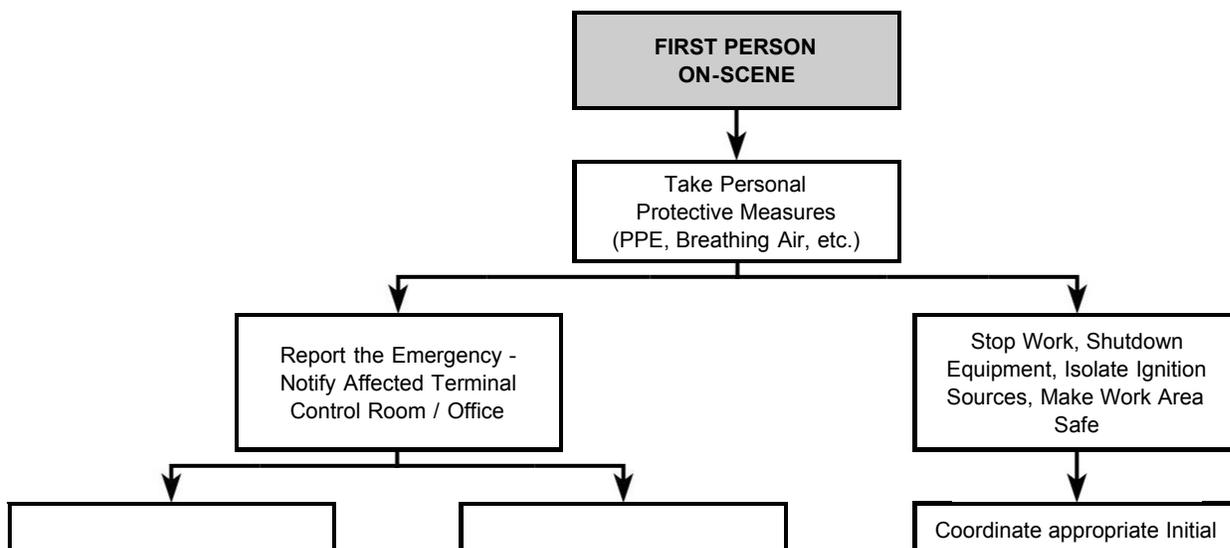
Facility Emergencies are Reported to (Office and/or Position):	Terminal Manager and/or Operations Director	
Facility Emergency Number(s):	(956) 831-3531	
Emergency Reporting Protocol:	<p>Immediately notify the Terminal Manager.</p> <p>Activate the Emergency Response Team (local team), as the situation demands.</p> <p>Activate local emergency response resources [Oil Spill Removal Organizations (OSRO), fire, police, medical, etc.].</p> <p>Notify the Area Manager or Operations Director (if applicable), as the situation demands.</p> <p>Notify a member of the Emergency Management Team (corporate team) and other external organizations, as the situation demands.</p>	
Facility Alarm Descriptions:	Alarm Type	Alarm Description
	Hand Aerosol Horn	Three Short Blasts
Immediate Actions:	Refer to SECTION 2 Initial Response Actions Checklists for appropriate response actions.	

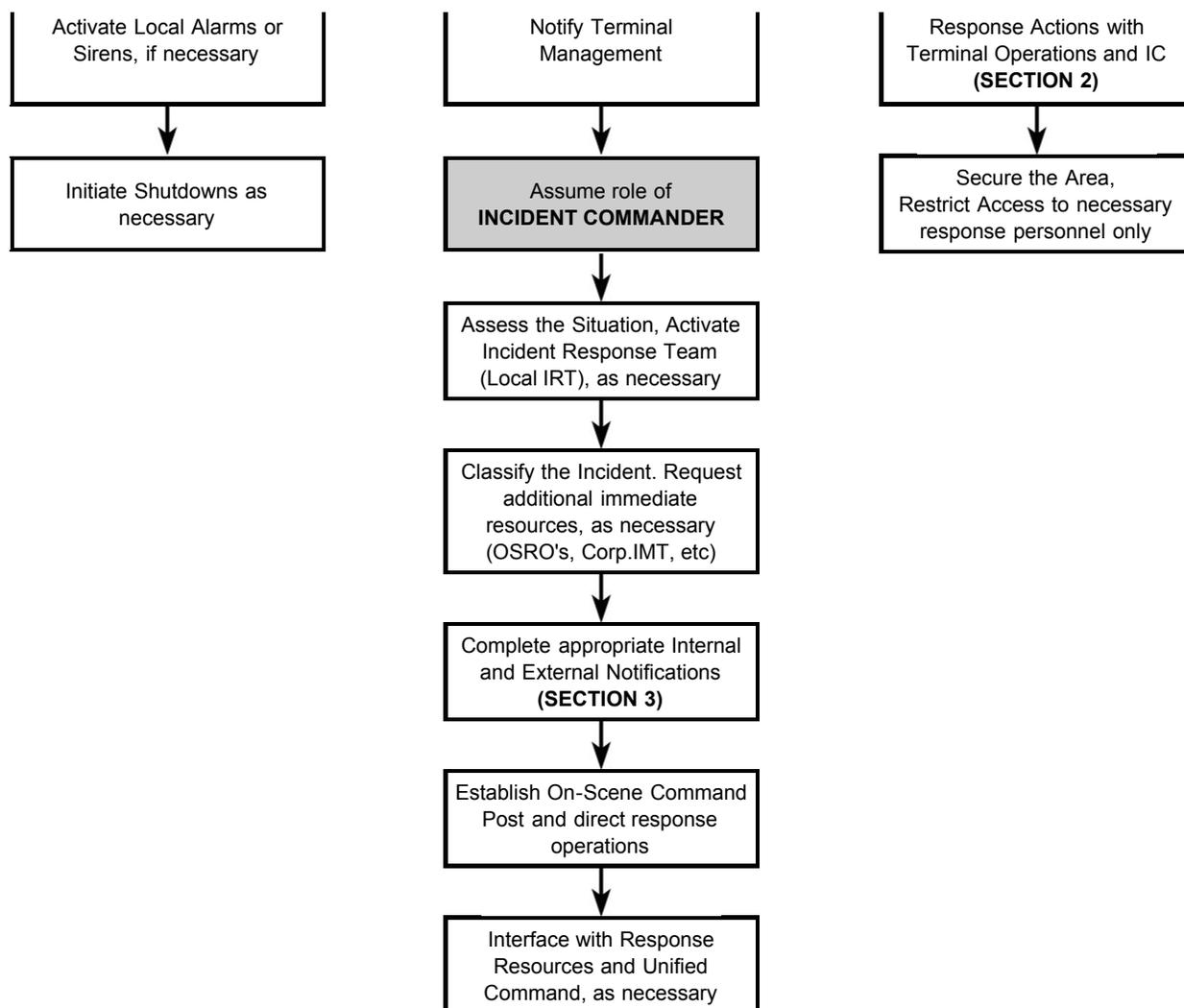
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FIGURE 2-2 - INITIAL RESPONSE FLOWCHART





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FIGURE 2-3 - INITIAL RESPONSE ACTION CHECKLIST

SPECIFIC RESPONSE ACTIONS	COMMENTS
First Person On-Scene	
Take appropriate personal protective measures.	
Notify Terminal Management of the incident.	
Advise personnel in the area of any potential threat and/ or initiate evacuation procedures.	
Eliminate possible sources of ignition in the vicinity of the spill.	
Restrict access to the incident scene and surrounding area as the situation demands.? Take any other steps necessary to minimize any threat to health and safety.	
Initiate the appropriate Initial Response Actions (SECTION 2).	
Request medical assistance if an injury has occurred.	
Verify the type of product and quantity released, request/obtain Material Safety Data Sheets as necessary.	

Identify/ isolate the source and minimize the loss of product.	
Initiate containment of spill material.	
Coordinate further initial response actions with local supervision and Incident Commander.	
Qualified Individual/Incident Commander	
Evaluate the Severity, Potential Impact, Safety Concerns, and Response Requirements based on the initial information provided by the First Person On-Scene.	
Assume the role of Incident Commander.	
Classify the incident (SECTION 3.1).	
Confirm safety aspects at site, including need for personal protective equipment, sources of ignition, and potential need for evacuation.	
Activate the Incident Response Team (IRT), as the situation demands (SECTION 4).	
Notify Area Manager or Director, as appropriate.? Provide incident briefing and coordinate activation of Corporate Incident Management Team (IMT), as the situation demands.	
Notify National Response Center and the appropriate state and local officials.	
Activate additional response contractors and local response resources, as the situation demands (SECTION 3).	
Coordinate/complete additional Internal and External Notifications (SECTION 3).	
Proceed to incident site and direct response and clean-up operations.	
Incident Response Team (Local IRT)	
Designated IRT personnel will immediately respond to an incident at the Facility, or Facility Pipelines, as the situation demands.	
Perform response/cleanup operations as directed or coordinated by the Incident Commander.	
Refer to SECTION 6 for detailed discussion and mapping of Sensitive Areas and SECTION 7.4 for Disposal Plans.	
Assist as directed at the incident scene.	

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2.1 SPILL RESPONSE

FIGURE 2.1-1 - SPILL RESPONSE ACTION CHECKLIST

SPECIFIC RESPONSE ACTIONS	COMMENTS
Line Break or Leak	
Shut down source/pumping equipment.	

Close upstream and downstream valves.	
Utilize Combustible Gas Indicator, O ₂ meter, proper colorimetric indicator and other air sampling measurements (as applicable) to assure that areas are safe to enter for continued response operations.	
Mitigate spreading of the product, as the situation demands.? Potential containment strategies include: <ul style="list-style-type: none"> • Deployment of boom (Reference ACP for potential strategies) • Diking, trenching, and/ or diversion • Spreading sorbent material over the spill • Prevent the spill from entering water to the greatest extent possible 	
Determine the direction and expected duration of spill movement.? Refer to SECTION 2.1.2.	
Drain the line section, as the situation demands.	
Request local authorities to establish scene security and traffic control in the area, as the situation demands.	
Make all necessary repairs.	
Return the line/rack to service when repairs are complete.	
Clean up spilled product to eliminate any possible environmental problems.? Be alert for underground cables.	
If the spill escapes the containment area, review the location of socio-economic and environmentally sensitive areas identified in SECTION 6. ? Determine which of these may be threatened by the spill and direct the response operation to these locations. Initiate protection and recovery actions.	
Inform local utilities, telephone company, railway, etc., as necessary.	
Complete follow-up and written reporting, as the situation demands.	
Storage Tank Leak	
Shutdown all tank product movement operations and isolate the tank.	
Initiate Confined Space Entry procedures, as applicable.	
Insure that the containment area drainage valve(s) is closed.	
If leak is near tank bottom, create and maintain a ?water bottom? to suspend the discharge of product.	
Utilize Combustible Gas Indicator, O ₂ meter, proper colorimetric indicator and other air sampling measurements (as applicable) to assure that areas are safe to enter for continued response operations.	
Block drainage of spilled material from traveling off-site.	
Stop all traffic in hazardous area (inside and outside of property boundaries), as the situation demands.	
Remove product from containment (at a sump or in a low area) with an explosion proof pump, oil skimmer, and/or vacuum truck w/ skimmer attachments.	

FIGURE 2.1-1 - SPILL RESPONSE ACTION CHECKLIST, CONTINUED

SPECIFIC RESPONSE ACTIONS	COMMENTS
Storage Tank Leak, Continued	
If applicable, process remaining product through a separator system.	
Determine the direction and expected duration of spill movement.? Refer to SECTION 2.1.2 .	
Request that local authorities establish scene security and traffic control in the area, as necessary.	
Empty tank as soon as possible.	
Make all necessary repairs.? Return the line/tank to service when repairs and integrity testing are completed.	
Clean up product spill to eliminate any possible environmental problems.? Be alert for underground cables, conduits, etc.	
If necessary, call an approved waste removal company to handle the remaining sludge and residue from the containment area.	
If the spill escapes the containment area, review the location of socioeconomic and environmentally sensitive areas identified in SECTION 6 and the ACP.? Determine which of these may be threatened by the spill and direct the response to these locations.? Initiate protection and recovery actions.	
Inform local operators such as utilities, telephone company, railway, as necessary.	
Complete follow-up and written reporting, as the situation demands.	
Leak or Spill at Truck Rack	
Evacuate personnel from the truck rack area, as the situation demands.	
Shutdown all loading operations, pump motors and loading valves.	
Guard against all sources of ignition.	
Secure the area. Stop all traffic from entering rack or hazardous area.	
If a line leak is involved, close off riser valves and/or tank valves.	
Clean area with sorbent material, flush (with water) all remaining product into a separator system.	
Resume truck loading operations as directed by Terminal Management.	
Truck Leaks/Spills Outside Terminal	
<i>Note:? This type of spill will rarely be the responsibility of Terminal personnel.</i>	
Notify local fire and police departments.	
Secure the area. Keep all traffic away from the scene.	
Notify Terminal Management of the incident with the following	

information:	
<ul style="list-style-type: none"> • Location of spill. • Size of spill. • Product type. • Present situation. • If assistance/equipment is required for cleanup. • If product spills on a highway or other impervious surface, clean area with sorbent materials, vacuum truck, or other cleanup equipment as available or necessary. If product has entered sewer system, advise the local Fire Department. 	
Consider the need to evacuate area residents. Request assistance from local authorities (fire, police departments) as necessary.	
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FIGURE 2.1-1 - SPILL RESPONSE ACTION CHECKLIST, CONTINUED

SPECIFIC RESPONSE ACTIONS	COMMENTS
Marine Operation Spills/Leaks (as appropriate)	
Shut down all engines/motors.	
Close all line and vessel manifold discharge valves.	
If hose rupture is involved, drain line into vessel, drums or buckets, and blank line to stop spill into water.	
Initiate Confined Space Entry procedures, as applicable.	
Utilize Combustible Gas Indicator, O ₂ meter, proper colormetric indicator and other air sampling measurements (as applicable) to assure that areas are safe to enter for continued response operations.	
If other than hose rupture, determine source of leak and stop discharge.	
Prevent discharge from entering the water if at all possible by: <ul style="list-style-type: none"> • Pumping from sump or deck drainage system into drums, tanks, containment area, or other storage facility. • Directing the flow into a containment or collection area away from the water, if feasible. • Placing containment boom or sorbent material around area (provided that a safe operating environment exists). 	
If product enters the water and a safe operating environment exists, try to contain by: <ul style="list-style-type: none"> • Deploying spill response equipment (facility and/or contract) to prevent/mitigate spill impact (spreading of spill). 	
Attempt to divert/contain the spill:	

<p>In quiet area or low current areas of the water.</p> <ul style="list-style-type: none"> • Away from strong winds or in areas that could be affected by change in wind direction. • Away from areas of hazard to public, property improvements, marinas, water intakes, or any environmentally sensitive areas. 	
Make all necessary repairs.	
Return the line/vessel to service when repairs are complete.	
Clean up spilled product to eliminate any possible environmental problems. Be alert for underground cables, etc.	
If the spill escapes the containment area, review the location of socioeconomic and environmentally sensitive areas identified in SECTION 6 and the ACP. Determine which of these may be threatened by the spill and direct the response operation to these locations. Initiate protection and recovery actions.	
Request local authorities (USCG, Port Authority, etc.) to establish traffic control in the area, as the situation demands.	
Inform local operators such as utilities, telephone company, railway, as necessary.	
Complete follow-up and written reporting, as the situation demands.	

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2.1.1 Spill Detection and Mitigation Procedures

See **APPENDIX D.1** for spill detection protocols.

Each spill mitigation situation is unique and must be handled according to the circumstances 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. Spill mitigation procedures are listed in **FIGURE 2.1-2**. Worst Case Discharge volume calculations and discussion are provided in **APPENDIX D**.

FIGURE 2.1-2 - SPILL MITIGATION PROCEDURES

TYPE	MITIGATION PROCEDURE
Failure of Transfer Equipment	<ul style="list-style-type: none"> • Personnel safety is the first priority. Evacuate nonessential personnel or personnel at high risk. • Terminate transfer operations and close all affected valves. • Drain product into containment areas if possible. • Eliminate sources of vapor cloud ignition by shutting down all engines and motors.
Tank/Overfill/Failure	<ul style="list-style-type: none"> • Personnel safety is the first priority. Evacuate nonessential personnel or personnel at high risk. • Shut down or divert source of incoming flow to tank. • Transfer fluid to another tank with adequate storage capacity (if possible).

	<ul style="list-style-type: none"> • Shut down source of vapor cloud ignition by shutting down all engines and motors. • Ensure that dike discharge valves are closed. • Monitor diked containment area for leaks and potential capacity limitations. • Begin transferring spilled product to another tank as soon as possible.
Piping Rupture/Leak (under pressure or not)	<ul style="list-style-type: none"> • Personnel safety is the first priority. Evacuate nonessential personnel or personnel at high risk. • Shut down pumps. Close the closest valves on each side of the rupture. • Drain the line back into contained areas (if possible). Alert nearby personnel of potential safety hazards. • Shut down source of vapor cloud ignition by shutting down all engines and motors. • 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.
Fire/Explosion	<ul style="list-style-type: none"> • Personnel safety is the first priority. Evacuate nonessential personnel or personnel at risk of injury. • Notify local fire and police departments. • Attempt to extinguish fire if it is in incipient (early) stage. • Shut down transfer or pumping operation. Attempt to divert or stop flow of product to the hazardous area (if it can be done safely). • Eliminate sources of vapor cloud ignition by shutting down all engines and motors. • Control fire before taking steps to contain spill.
Manifold Failure	<ul style="list-style-type: none"> • Personnel safety is the first priority. Evacuate nonessential personnel or personnel at high risk. • Terminate transfer operations immediately. • Isolate the damaged area by closing block valves on both sides of the leak/rupture. • Shut down source of vapor cloud ignition by shutting down all engines and motors. • Drain fluids back into containment areas (if possible).

2.1.2 Spill Surveillance Guidelines

- 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 spills' 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.
- 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 to gauge the effectiveness of response operations; to assist in locating skimmers; and assess the spill's size, movement, and impact.
- An Oil Spill Surveillance Checklist is provided in **FIGURE 2.1-3**.

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FIGURE 2.1-3 - OIL SPILL SURVEILLANCE CHECKLIST

Record your observations of spilled oil either in a notebook or directly on a map of the area under observation. This checklist is an aid for organizing your observations. File used forms with local area office to retain for five years.

General Information	
Date:	Tidal or River Stage, if applicable (flood, ebb, slack, low water):
Time:	On-Scene Weather (wind, sea state, visibility):
Incident Name:	Observation Platform (helicopter, fixed-wing

	aircraft, boat):
Observer's Name:	Flight path/trackline:
Observer's Affiliation:	Altitude where observation taken:
Location of Source (if known):	Areas not observed (i.e. foggy locations, restricted air spaces, shallow water areas):
Oil Observations	
Slick Location(s):	Color and Appearance (i.e. rainbow, dull or silver sheen, black or brown in color or mousse):
Slick Dimensions:	Percent Coverage:
Orientation of Slick(s):	Is Oil Recoverable (Y/N)?:
Distribution of Oil (i.e. windrows, streamers, pancakes or patches):	
Considerations	
<ul style="list-style-type: none"> • During surveillance flights, travel beyond known impacted areas to check for additional oil spill sites • Include the name and phone number of the person making the observations • Clearly describe the locations where oil is observed and the areas where no oil has been seen 	
Other Observations	
Response Operations	
Equipment deployment (general locations where equipment is working and whether they are working in the heaviest concentration of oil):	
Boom deployment (general locations of boom, whether the boom contains oil, and whether the oil entrains under the boom):	
Environmental Observations	
Locations of convergence lines, terrain, and sediment plumes:	
Locations of debris and other features that could be mistaken for oil:	

Wildlife present in area (locations and approximate numbers):

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2.1.3 Spill Volume Estimating

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

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

Some rapid methods to estimate spill size are:

- Transfer operations: Multiply the pumping rate by the elapsed time that the leak was in progress, plus the drainage volume of the line between the two closest valves or isolation points (volume loss = pump rate [bbls/min] x elapsed time [min] + line contents [bbl])
- Tank overfills: Elapsed time multiplied by the pumping rate
- Visual assessment of the surface area and thickness (**FIGURE 2.1-4**); the 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

FIGURE 2.1-4 - SPILL ESTIMATION FACTORS

OIL THICKNESS ESTIMATIONS				
Standard Form	Approx. Film Thickness		Approx. Quantity of Oil in Film	
	inches	mm		
Barely Visible	0.0000015	0.00004	25 gals/mile ²	44 liters/km ²
Silvery	0.000003	0.00008	50 gals/mile ²	88 liters/km ²
Slightly colored	0.000006	0.00015	100 gals/mile ²	179 liters/km ²
Brightly colored	0.000012	0.0003	200 gals/mile ²	351 liters/km ²
Dull	0.00004	0.001	666 gals/mile ²	1,167 liters/km ²

Dark	0.00008	0.002	1,332 gals/mile ²	2,237 liters/km ²
Thickness of light oils: 0.0010 inches to 0.00010 inches				
Thickness of heavy oils: 0.10 inches to 0.010 inches				

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2.1.4 Estimating Spill Trajectories

In some cases, oil spill trajectories should be estimated in order to predict direction and speed of the slick movement. Trajectory calculations provide an estimate of where oil slicks may impact shorelines and other sensitive areas, and also provide an estimate of the most effective location in which to mobilize spill response resources for protection, containment, and recovery.

Oil spill trajectories can be estimated using vector addition or with computer programs such as CAMEO. Hand calculations typically utilize the following assumptions:

- Oil moves at approximately the same direction and speed as the water currents, unless the winds are strong
- Wind speed can be multiplied by 0.034 to determine the effect of winds on speed and direction of spill movement
- The combined effects of winds and currents can be added to estimate spill movement speed and direction

More sophisticated predictions can be obtained from computer programs. Oil spill trajectory services can be obtained from:

- National Oceanic and Atmospheric Administration (NOAA) through the Federal On-Scene Commander (FOSC)
- Private consulting firms

2.1.5 Initial Containment Actions

Initial containment actions will focus on utilizing containment on site in the most effective manner to:

- Prevent the oil from impacting water, thereby reduce the surface area and the shoreline to be cleaned
- Concentrate the oil (when safe to do so), making physical recovery more efficient
- Limit the environmental impact to the immediate spill area

Selection of the appropriate location and method will depend upon:

- Length of time spill occurs before being noticed
- Amount of spill

- Area of coverage
- Environmental factors such as wind speed and direction
- Oil's characteristics

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2.1.6 Safety Considerations

- Containment actions should not be conducted during inclement weather or unsafe conditions such as high winds, fast currents, or unstable terrain
- Eliminate all ignition sources
- Avoid contact with the spilled product
- Use respiratory protection (if applicable)
- Ensure that the area remains secure to air traffic

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2.2 FIRE / EXPLOSION / VAPOR RELEASE

2.2.1 Fire, Explosion, and Vapor Release Response Actions

SPECIFIC RESPONSE ACTIONS	COMMENTS
FIRE / EXPLOSION	
Discontinue all tasks in progress (hot work, truck loading, maintenance, etc.).	
Sound local fire alarm, if available.	
Attempt to extinguish incipient stage fires, if trained to do so.	
Report the condition to Terminal Management and take further defensive actions as instructed.	
Engage emergency shutdown systems and/or manually (from a safe distance) isolate fuel sources, shutdown engines and heaters.	
Evacuate personnel to designated assembly areas.	
Account for personnel.	
Initiate rescue activities as necessary, if properly trained.	
Make appropriate notifications to local fire and EMS. Make other internal management contacts as appropriate. (SECTION 3)	
Establish a secure perimeter around the area to prevent unauthorized entry.	

Initiate Site Security Plan. (SECTION 5.6)	
Continue measures to contain the fire, apply water from a safe distance to protect adjacent equipment, if necessary.	
Recognize fire conditions which present BLEVE hazards and protect personnel and the public appropriately. (SECTION 2.2.3)	
Contain spilled material and runoff. Dike far ahead of the release, as necessary.	
Make appropriate government agency notifications. (SECTION 3)	
Conduct post-incident activities. (SECTION 8)	
VAPOR RELEASE	
Report the release to Facility Manager.	
Sound the facility alarm.	
Do not assume vapors or gases are harmless because of lack of odor - Harmful vapors or gases may be odorless.	
Evacuate personnel from the immediate area to the designated assembly area or to a location upwind of the release.	
Account for personnel.	
Engage emergency shutdown systems, and/or manually isolate release from a safe distance.	
Isolate all sources of potential ignition.	
Establish a secure perimeter around the area to prevent unauthorized entry.	
Complete internal and external notifications, as appropriate.	
Assess the threat to the public and notify public officials as appropriate.	
Initiate evacuation of surrounding homes, businesses, etc. with assistance from local law enforcement officials, as necessary.	
Conduct post-incident activities. (SECTION 8)	

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2.2.2 Fire Fighting Tactics

Upon discovering a fire:

- Attempt to extinguish incipient stages of fire, only if trained to do so.
- Block in the fuel source by tripping the ESD or manually from a safe distance.
- Protect the surrounding exposed areas and cool the burn area to control the fire.
- Withdraw personnel and notify local fire department.
- Confer with fire department personnel about the need for any special tactics or materials (e.g., alcohol-resistant foam for ethanol-based fires).

Safety Guidelines:

Any efforts made to rescue personnel and protect property or the environment must be weighed against the possibility that you could become part of the problem.

- Evacuate and account for personnel as necessary.
- Continue to reassess the situation and modify the response accordingly.
- **Do not walk into or touch spilled materials.**
- Do not assume vapors are harmless because of a lack of odor - **Harmful gases or vapors may be odorless.**

2.2.3 BLEVE - Boiling Liquid Expanding Vapor Explosion

BLEVE occurs when:

- Sealed containers of liquefied gases are accidentally exposed and enveloped by fire.
- Vapor is generated and internal pressure rapidly rises.
- The container wall temperature rises in the outage or unfilled area.
- Wall strength deteriorates and the stress applied by the increased pressure exceeds the reduced strength of the wall.
- The container ruptures and super-heated liquid is released, expands and vaporizes in seconds resulting in catastrophic damage from the spread of ignited vapors. The ruptured vessel or tank could propel dangerous shrapnel significant distances. It is important that:
 - vessels or tanks are kept cool, and
 - external fires are extinguished quickly.

Fire Fighters should do the following:

- Fight fire from the maximum distance possible, or use unmanned hose holders or monitor nozzles.
- Cool containers by flooding them with large amounts of water until well after the fire is out.
- Do not direct water at the source of leak or at safety devices; icing may occur.
- Leave the area immediately if you hear a rising sound from venting safety devices or see discoloration of the tank.
- For massive fires, use unmanned hose holders or monitor nozzles; if this is impossible, leave the area and let the fire burn.
- Be aware that when a BLEVE occurs, sections of the tank can fly in any direction. Just avoiding the ends of the tank should not be considered a safe operating procedure.

Always consider your own safety and the safety of people in the immediate area first.

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2.3 MEDICAL EMERGENCY / PERSONAL INJURY

2.3.1 Medical Emergency / Personal Injury Response Actions

SPECIFIC RESPONSE ACTIONS	COMMENTS
General	
Medical emergencies may involve and/or be categorized as follows: <ol style="list-style-type: none"> First Aid - One or more patients with minor injuries which can be effectively managed with the application of routine First 	

<p>Aid. This type of injury does not require medical transport to a hospital, but may require follow-up with a Physician.</p> <p>b. Serious - One or more patients with moderate to serious injuries, requiring response by local Emergency Medical Services (EMS) and may include transport to a hospital for advanced care and treatment.</p> <p>c. Life-Threatening - One or more patients with serious or life-threatening injuries, requiring response by local Emergency Medical Services (EMS) and includes transport to a hospital for advanced care and treatment.</p>	
Assess the scene; protect yourself.	
Summon local Emergency Medical Services (EMS) to the scene; provide information on the nature of injuries and number of injured persons (SECTION 3).	
If trained, provide First Aid/CPR as necessary, until EMS arrives at the scene; injured personnel should not be moved unless the situation is life threatening.	
Initiate Medical Evacuation (via air or ground transport) as recommended by EMS personnel.	
Establish a secure perimeter around the area to prevent unauthorized entry. Initiate the Site Security Plan, as necessary (SECTION 5.6).	
Notify Facility Manager and make appropriate notifications to local emergency agencies if necessary. Make other internal management contacts as appropriate (SECTION 3).	
<p>In case of a fatality (Refer to SECTION 2.7.1):</p> <ul style="list-style-type: none"> • Do not move the victim • Do not release name of victim(s) • Contact local law enforcement • Contact local medical authority • Preserve the accident site • Restrict all communications concerning the incident (do not release names of victims unless authorized) 	
Conduct post-incident activities (SECTION 8).	

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2.4 NATURAL DISASTER / SEVERE WEATHER

2.4.1 Earthquake Procedure

SPECIFIC RESPONSE ACTIONS	COMMENTS
Activate the emergency alarm if available.	
Evacuate personnel from the immediate area to the designated	

assembly area.	
Account for personnel.	
Evaluate the extent of the emergency.	
If time permits, engage emergency shutdown systems and/or manually isolate processes and equipment.	
Notify the Terminal Manager and make other internal notifications as appropriate. (SECTION 3)	
Conduct an inspection for residual safety hazards, such as: <ul style="list-style-type: none"> • Process safety/integrity • Structural damage • Downed power lines • Leaking natural gas, water and sewer lines 	
Arrange for necessary repairs.	
Conduct post-incident activities. (SECTION 8)	

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2.4.2 Flooding Procedure

SPECIFIC RESPONSE ACTIONS	COMMENTS
Account for personnel.	
Notify Facility Manager and make other internal notifications as appropriate. (SECTION 3)	
Evaluate the extent of the emergency.	
Prepare an evacuation plan based upon flood crest and weather forecast.	
Maintain tank levels as appropriate (consider tanks which may float or be should filled with water).	
Secure all loose items in the area that could do harm to other equipment (pipe, tools).	
Engage emergency shutdown systems and/or manually isolate processes and equipment, if necessary.	
Evacuate personnel, as necessary.	
Conduct an inspection for residual safety hazards, such as: <ul style="list-style-type: none"> • Structural damage • Downed power lines • Leaking natural gas, water and sewer lines • Poisonous snakes and other wildlife sheltering in structures, vehicles and furniture • Avoid direct contact with flood water, mud and animal carcasses 	

Arrange for necessary repairs.	
Conduct post-incident activities. (SECTION 8)	

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2.4.3 Hurricane Procedure

SPECIFIC RESPONSE ACTIONS	COMMENTS
Prior to Hurricane Season	
Conduct hurricane awareness training, which includes evacuation routes and asset hurricane procedures.	
Coordinate activities with local and state agencies involved in hurricane preparation (Emergency Access Cards, etc.).	
Communicate recommended Community Evacuation routes.	
Determine disposition of company vehicles during evacuation.	
Each location should maintain current photographs of facilities.	
June 1 - Beginning of Hurricane Season	
Verify the availability of and procure emergency supplies, as necessary: <ul style="list-style-type: none"> • Portable Radios • Plywood, lumber, plastic sheeting or covering • Drinking water • First Aid Kits • Flashlight and batteries • Tools • Emergency non-perishable food item 	
Ensure emergency generators and portable equipment is in good working order and sufficient fuel is available.	
Hurricane entering Gulf of Mexico or Approaching East Coast	
Implement hurricane procedures.	
Identify employees who may volunteer to implement hurricane procedures.	
72 hours prior to hurricane's eye reaching landfall	
Cancel all training and meetings requiring travel to affected areas.	
Designate location for temporary Communication Center.	
Verify contractor contacts and availability.	
All employees shall provide to their supervisor an evacuation location and contact number.	
Each location shall identify a radio frequency which broadcasts emergency weather information.	

Report facility status to Corporate Management.	
---	--

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2.4.3 Hurricane Procedure, Continued

SPECIFIC RESPONSE ACTIONS	COMMENTS
48 hours prior to hurricane's eye reaching landfall	
Implement flex-shift to allow employees to secure personal property.	
Ensure all storage tanks are stabilized.	
Ensure all below ground sumps have been pumped dry.	
Secure all critical documents including electronic data.	
Elevate electrical equipment, sensitive office equipment and documents in the event of high water.	
Report facility status to Corporate Management.	
36 hours prior to hurricane's eye reaching landfall	
Communicate with suppliers and affected customers.	
Report facility status to Corporate Management.	
24 hours prior to hurricane's eye reaching landfall	
Begin shutdown operations.	
Release non-essential personnel.	
Report facility status to Corporate Management.	
12 hours prior to hurricane's eye reaching landfall	
Man Communications Center continuously.	
Report facility status to Corporate Management.	
Post Storm Recovery Procedure	
Initiate facility damage assessment.	
Report facility status to Corporate Management.	
Once access has been granted, the following processes should be surveyed for operational reliability prior to startup:	
<ul style="list-style-type: none"> • Electrical panels and motors • Instrument air system • Emergency Shutdown System • Tank and Vessel foundation and support (possible washouts) • Check for dangerous wildlife and reptiles 	

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2.4.4 Tornado Procedure

SPECIFIC RESPONSE ACTIONS	COMMENTS
Activate the emergency alarm, if available, to alert all personnel.	
Notify and establish communications with the Facility Manager.	
If time permits, engage emergency shutdown systems and/or manually isolate processes and equipment.	
Initiate evacuation procedures, if necessary (SECTION 2.6), to designated storm shelter.	
Account for personnel.	
Make appropriate internal notifications. (SECTION 3)	
Conduct an inspection for residual safety hazards, such as: <ul style="list-style-type: none"> • Process safety/integrity, as necessary • Structural damage • Downed power lines • Leaking natural gas, water and sewer lines 	
Conduct post-critique activities. (SECTION 8)	

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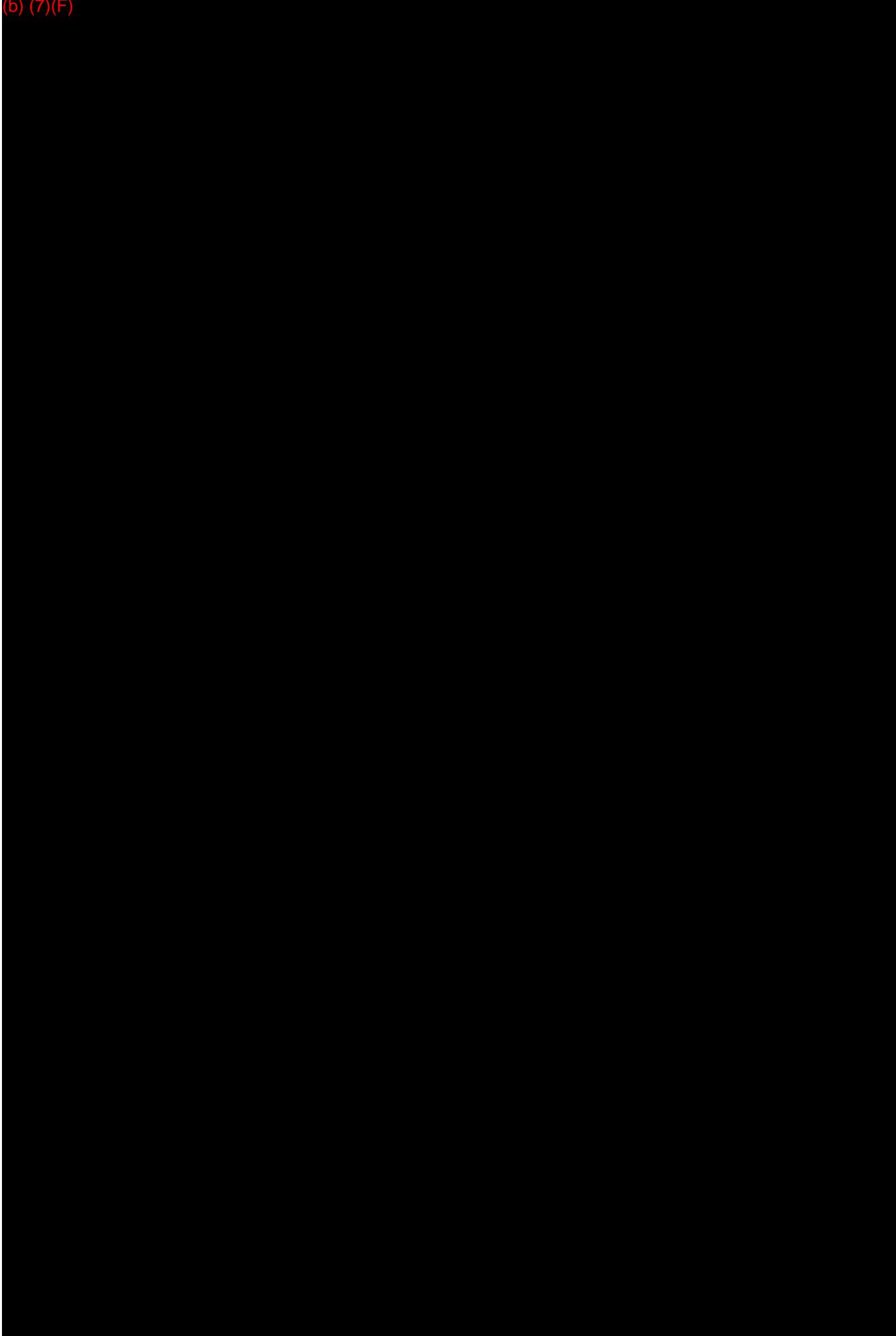
2.5 SECURITY RELATED INCIDENTS

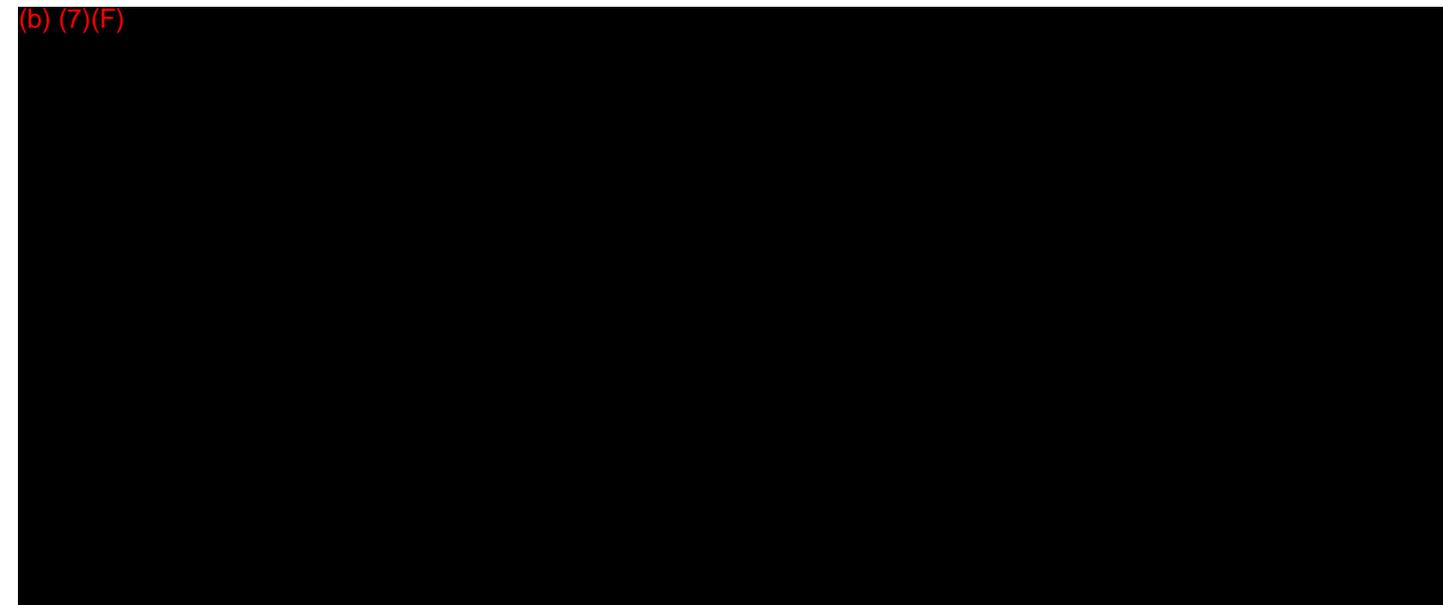
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2.5.1 Threats to Personnel and Facilities

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(b) (7)(F)



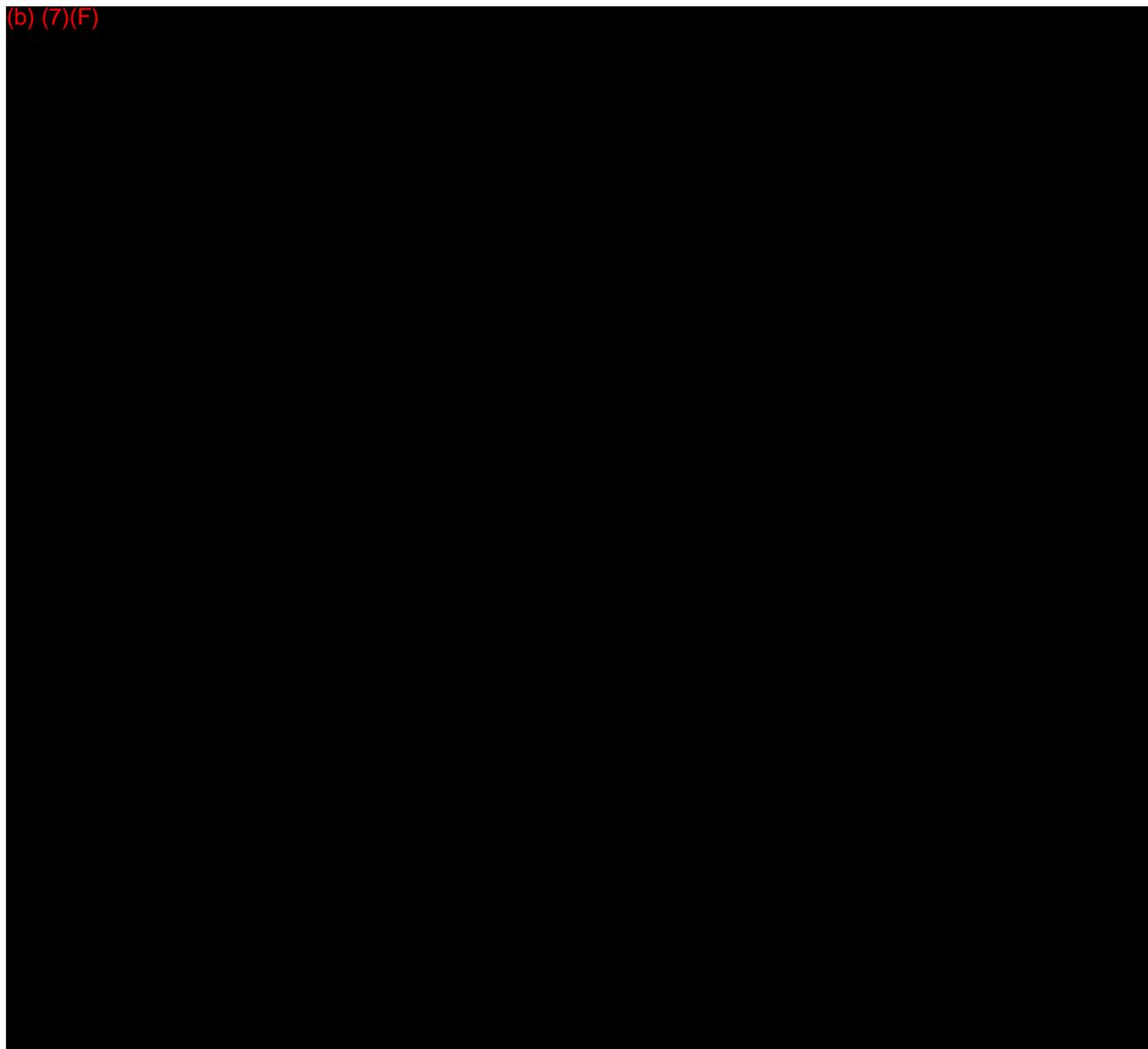


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2.5.2 Criminal Acts / Workplace Violence



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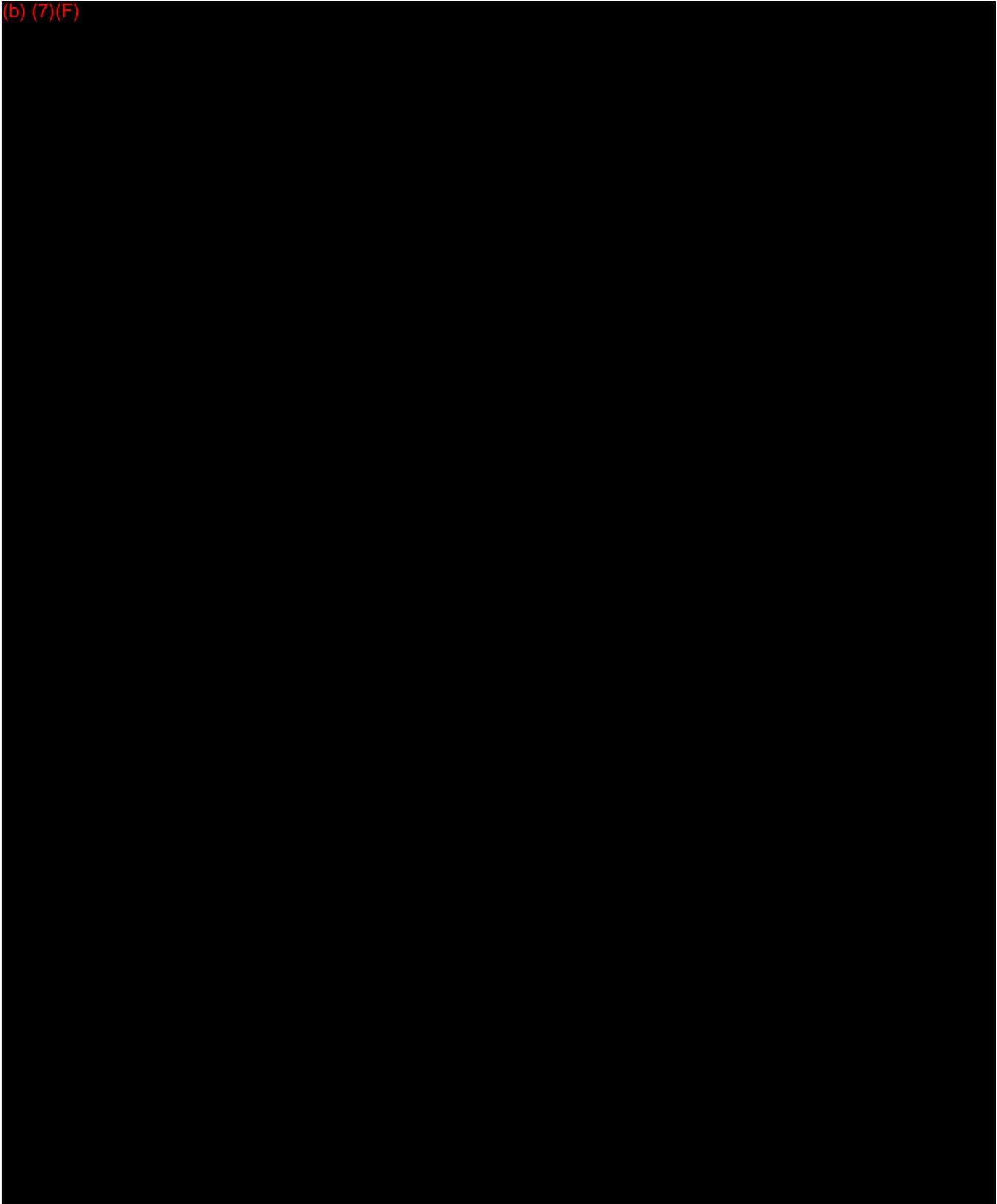
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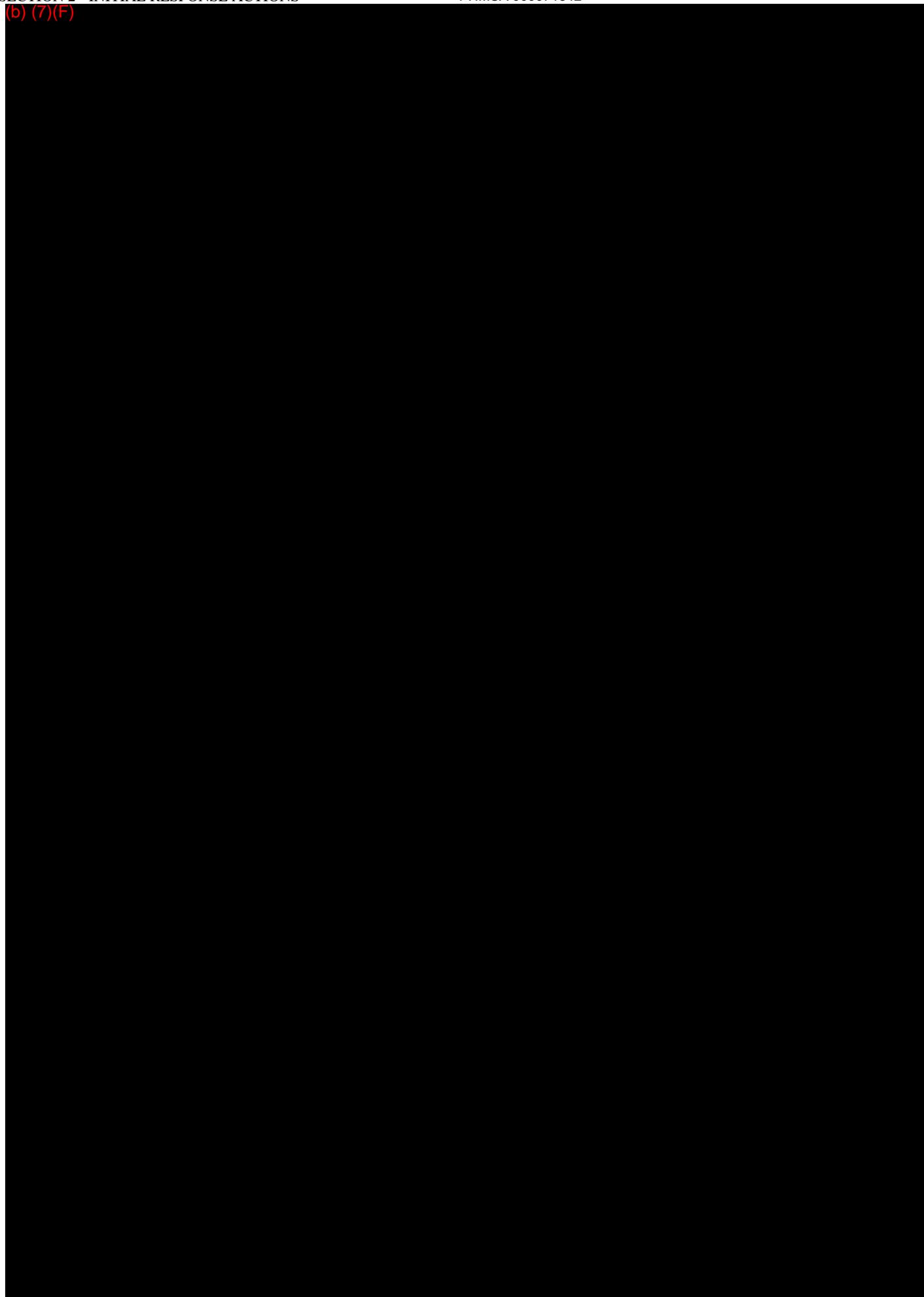
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2.5.3 Sabotage / Bomb Threat / Suspicious Package

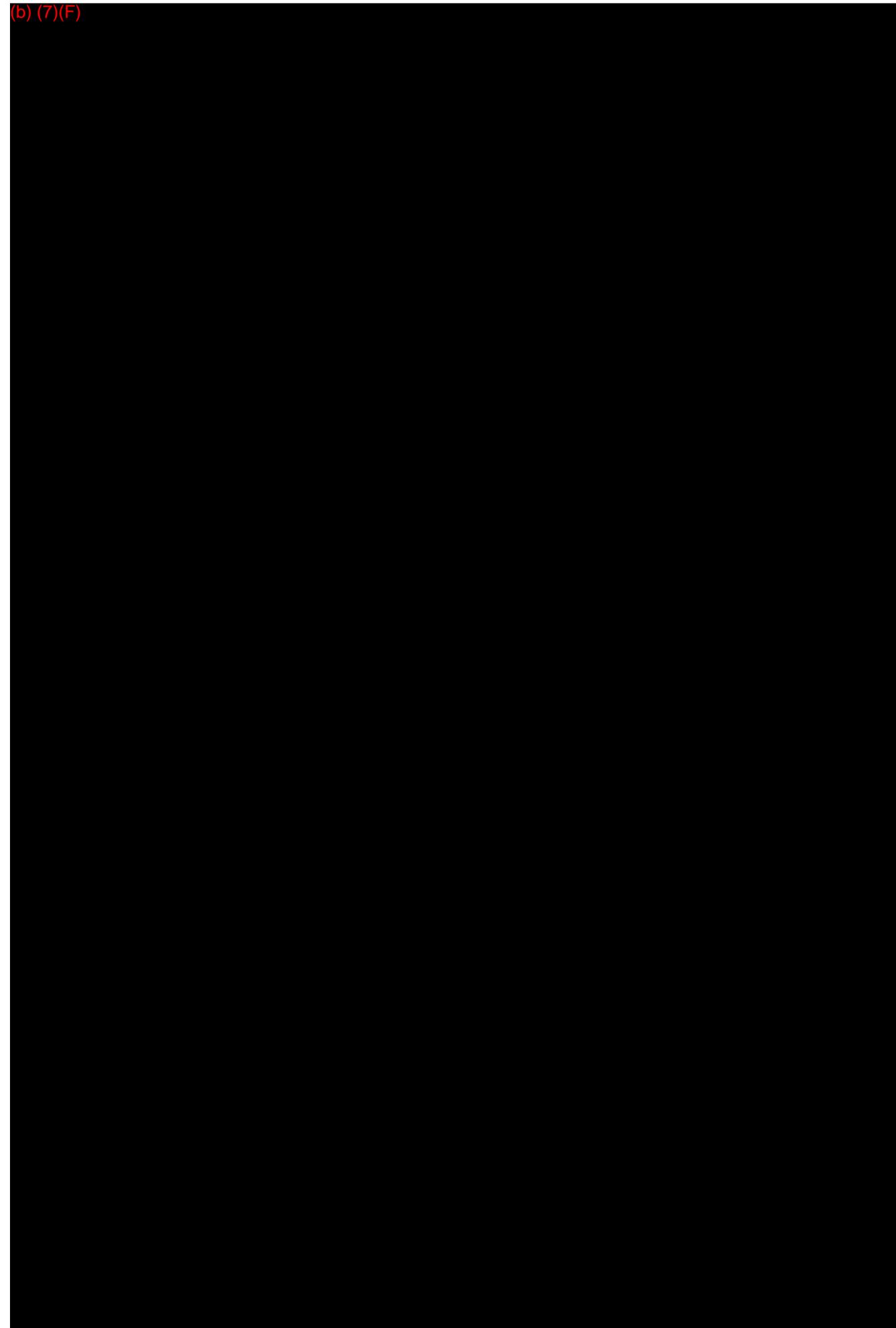
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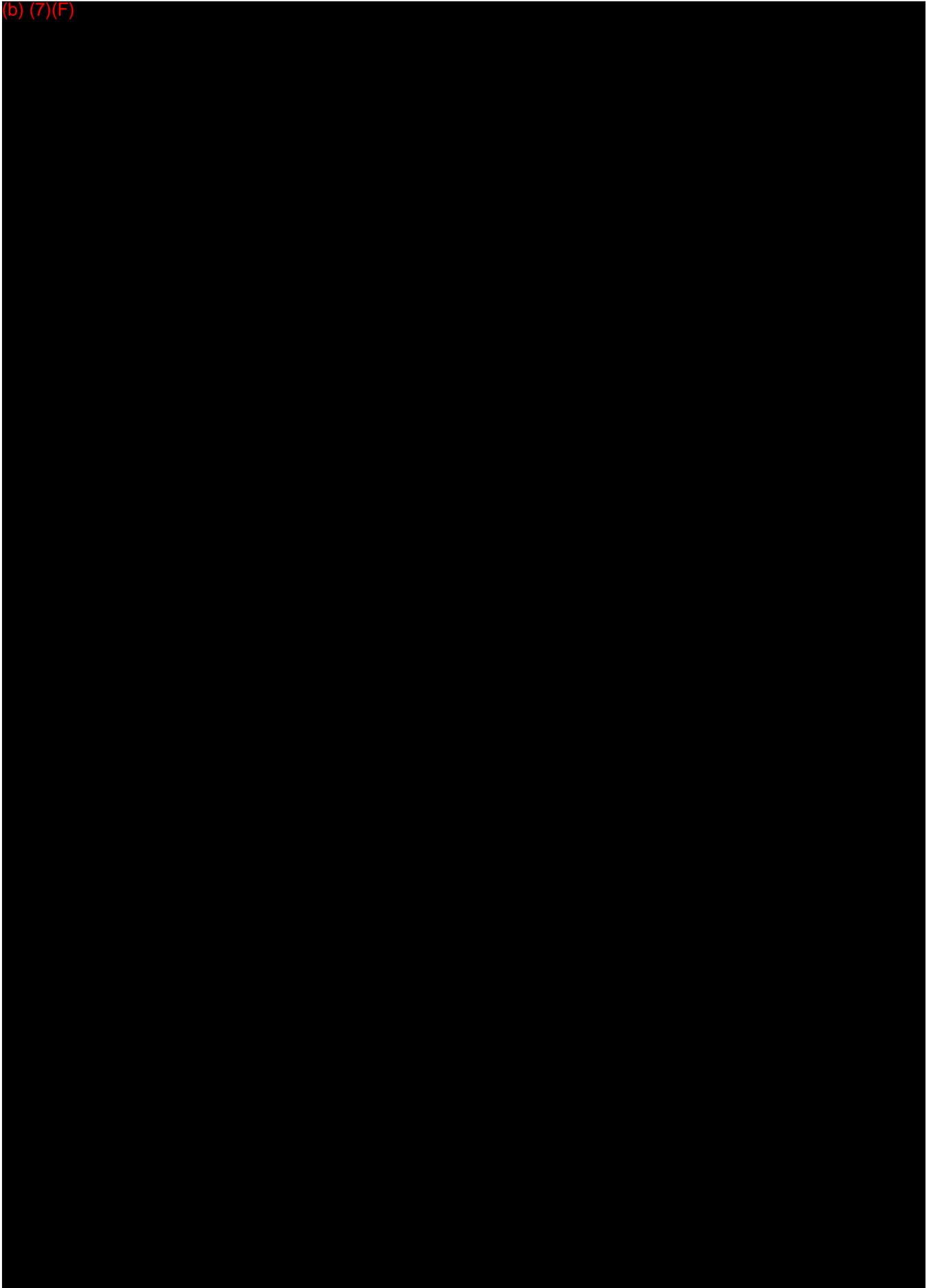
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2.6 EVACUATION

Company employees will be trained on this ERP, and these evacuation procedures herein, as described in **APPENDIX A**. Contractors, visitors and vendors shall be informed of these evacuation procedures upon entering the facility.

2.6.1 Evacuation Alarm

Refer to **FIGURE 2-1** for a description of Facility Alarms.

2.6.2 Critical Operations and Initial Response Actions

When a facility evacuation is initiated, the designated Incident Commander will assess the emergency and determine if any initial response actions should be implemented prior to full evacuation. If it is determined that initial response actions are appropriate to minimize the emergency, the Incident Commander will communicate and coordinate such actions with the designated and properly trained facility personnel. Refer to **FIGURE 2.6-1** Evacuation Procedure Checklist.

If it is possible to do so safely, the following actions will be performed prior to evacuation:

- All product transfer and loading operations will be stopped.
- All Permitted maintenance work will be stopped and associated equipment shutdown or placed in a safe state.
- Safety and/or fire fighting systems will be activated, as appropriate.

2.6.3 Protection Options - Evacuation vs. Shelter In Place

Evacuation (direct avoidance of a hazard) is the preferred option to safeguard personnel during an emergency. However, evacuation may not be the best option for every situation where reaction time may be limited, or other critical factors exist (i.e.; chemical release from nearby industrial facility, tornado, etc.). In these cases Sheltering in Place may be the best alternative to direct exposure to a hazard outdoors.

In all cases, where notification and adequate warning time have been provided, personnel are to evacuate to designated Muster Points to avoid a potential hazard. All shelter in place recommendations will be communicated by the Incident Commander. Refer to **SECTION 2.6.7** for Shelter in Place Guidelines.

2.6.4 Evacuation Routes

All Reasonable Evacuation Routes and Emergency Exits are designated as illustrated in **FIGURE 2.6-2**. Persons shall not evacuate the facility via other routes or exits, unless conditions prevent the safe use of designated evacuation routes or exits. In general, personnel shall not attempt to traverse product transfer areas, or other process areas not intended for foot traffic, during an evacuation.

Before committing to an evacuation route, Personnel should always be aware of the nature and location of the emergency, the location of stored materials (i.e., tanks and piping), hazards imposed by any spilled materials (i.e., flammability and/or inhalation), and the current wind direction (via observation of wind socks or steam vents).

2.6.5 Shelter and Evacuation Muster Point Locations

The designated Shelters and Evacuation Muster Points for this facility are identified in **FIGURE 2.6-2**, and in the table below. Shelter in Place locations are designated inside the facility. Muster Point locations are designated outside of the facility. Shelter and Muster Point locations are also designated as Primary or Secondary. If safe to do so, evacuating personnel should use the Primary site designated for their area, unless emergency conditions dictate that the Secondary location be used.

Upon arrival at a Shelter or Muster Point, personnel shall remain at the location, participate in the Personnel Accountability process, and await further instructions from the Incident Commander or designated person. If the Evacuation Warden is not present at the Shelter or Muster Point, the senior Company employee on-scene shall assume leadership of the group.

SHELTER AND EVACUATION MUSTER POINT LOCATIONS

FACILITY AREA(S)	SHELTER(S)		MUSTER POINT(S)	
	PRIMARY	SECONDARY	PRIMARY	SECONDARY
North Side of Ship Channel	Main Office Southwest Terminal	R. M. Walsdorf Co. Office	Main Office Southwest Terminal	R. M. Walsdorf Co. Office
South Side of Ship Channel	Brownsville Terminal Office	Citgo Petroleum Terminal Office	Brownsville Terminal Office	Citgo Petroleum Terminal Office

2.6.6 Personnel Accountability

Procedures to account for facility personnel following an evacuation are as follows:

- The Qualified Individual shall be responsible for accounting for all employees after an emergency.
- A written report on the head count shall be given to a member of the Incident Management Team.
- The police and/or fire department shall be informed if any person is believed missing.
- Designated employees may try to account for a missing person.? However, at no time during a search shall an employee place himself or someone else at risk.
- The Incident Commander is responsible for completion of the accountability process during an evacuation emergency. The Incident Commander may delegate this responsibility as necessary during an evacuation.
- The Incident Commander (or designee) will account for all Company and contract personnel, as well as visitors and vendors who may be on site, at the Shelter or Muster Point locations.
- The Incident Commander will be immediately notified of any personnel suspected or known to be missing or trapped. The Incident Commander will coordinate any necessary search and rescue efforts with appropriate local response resources. Under no circumstances are Company personnel to initiate search and rescue operations for which they are not properly trained.

- Personnel shall remain at the Shelter or Muster Point location(s) until the "All-Clear" signal, or further instructions, are communicated by the Incident Commander.

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2.6.7 Shelter In Place Guidelines

Shelter in Place Actions

Take Personal Protective Measures, as necessary:

- Respiratory protection - Take Breathing-Air or Escape Paks with you.
- Take portable or personal Detection Monitors with you.

Upon arrival at a Shelter location:

- Secure all sources of ventilation, including air conditioning.
- Secure ventilation ducts.
- Close and lock all windows.
- Close all doors.
- Seal seams and cracks with tape, towels, spare clothing or other available material.
- Secure all potential ignition sources.
- Keep personal Respiratory Protection immediately available.
- Report status to Incident Commander, or local response resources, and monitor emergency communications.

Shelter Location Criteria

Under extreme circumstances, any shelter (room or building) offers more protection, and is preferable, to direct exposure to a hazard outdoors. However, where possible, preferred shelter locations should be pre-identified. Typically, these will be the most accessible and airtight enclosures immediately available. The following list identifies the best qualities of a good shelter, and is provided only as a general guide in the selection of shelter locations.

- Centrally located and accessible from more than one direction.
- Adequate space available for largest number of persons anticipated.
- Solid construction, wall and ceiling joints and seams intact.
- Few windows, windows are normally closed or can be quickly locked and/or sealed.
- Ventilation ducts can be closed or sealed.
- Equipped with communications (telephone capable of dialing outside facility, and/or radio).
- Will support occupancy for up to four hours.
- Stocked with supply of drinking water.
- Equipped with spare breathing air and/or escape paks (preferred).

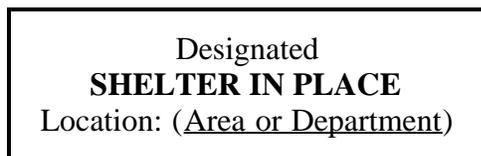
- Adjoining restroom available (preferred).

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Where Shelter in Place locations are designated, these locations should be identified with posted signage on the outside of the entrance door, similar to the example provided below.



2.6.8 Public Protective Measures

The Incident Commander will assess the emergency and any potential impact on surrounding communities. If necessary, the Incident Commander will notify local emergency management authorities if public protective measures (Shelter in Place or evacuation) are warranted (contact information is listed in **FIGURE 3.4-1**). Initial isolation and protective action distances will be coordinated with local authorities until the emergency has subsided, and protective action distances will be adjusted accordingly. If community evacuation is warranted, the Local Emergency Planning Committee (LEPC), Fire and/or Police Departments will lead in that effort. The Incident Commander will coordinate with personnel from these organizations, and efforts will be implemented in accordance with any existing city or county evacuation plans.

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FIGURE 2.6-1 - EVACUATION PROCEDURE CHECKLIST

SPECIFIC RESPONSE ACTIONS	COMMENTS
Take personal protective measures (Breathing Air, PPE, etc.).	
Report the emergency to Facility Manager.	
Sound facility Evacuation Alarm (FIGURE 2-1).	
Shutdown operating equipment, secure source of release (if possible), and isolate ignition sources.	
Proceed to the designated Muster Point. If Sheltering in Place is recommended by the Incident Commander, proceed to the designated Shelter location (Refer to SECTION 2.6.7).	
Account for all personnel.	
Establish a secure perimeter around the evacuated area to prevent unauthorized entry.	
Ensure adequate medical care for injured personnel. Initiate medical emergency procedure as required.	
Notify local fire, EMS and law enforcement of the evacuated area, the reason for evacuation, and the location of Muster Points.	

Complete internal notifications, as appropriate. (SECTION 3)	
Assess potential public exposures and initiate protective measures (Shelter in Place or evacuation), with assistance from local law enforcement officials, as necessary.	
Make appropriate government agency notifications. (SECTION 3)	
Conduct post-incident activities. (SECTION 8)	

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FIGURE 2.6-2 - FACILITY SHELTER AND EVACUATION MUSTER POINT PLOT PLAN

[Click here to view Brownsville Terminal Complex Evacuation Plan FIGURE 2.6-2a](#)

[Click here to view Brownsville Terminal Complex Evacuation Plan FIGURE 2.6-2b](#)

[Click here to view Brownsville Terminal Complex Evacuation Plan FIGURE 2.6-2c](#)

[Click here to view Brownsville Terminal Complex Evacuation Plan FIGURE 2.6-2d](#)

[Click here to view Brownsville Terminal Complex Evacuation Plan FIGURE 2.6-2e](#)

[Click here to view Brownsville Terminal Complex Evacuation Plan FIGURE 2.6-2f](#)

[Click here to view Brownsville Terminal Complex Evacuation Plan FIGURE 2.6-2g](#)

[Click here to view Brownsville Terminal Complex Evacuation Plan FIGURE 2.6-2h](#)

[Click here to view Brownsville Terminal Complex Evacuation Plan FIGURE 2.6-2i](#)

[Click here to view Brownsville Terminal Complex Evacuation Plan FIGURE 2.6-2j](#)

SECTION 3

NOTIFICATIONS / TELEPHONE NUMBERS3.1 Incident Classification3.2 Internal Notification Procedures**Figure 3.2-1 - Notification Flowchart****Figure 3.2-2 - Internal Incident Report Form**3.3 External Notification Requirements**3.3.1 Reporting Guidelines****Figure 3.3-1 - Regulatory Reporting Requirements**3.4 Notifications and Telephone Numbers**Figure 3.4-1 - Notifications and Telephone Numbers**

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3.1 INCIDENT CLASSIFICATION

The severity of an Incident will have a bearing on the level of management involvement necessary and the extent of resource mobilization. Normally, initial Incident Command will be assumed by Terminal Management (local IRT), but may evolve to the IMT (corporate team), and/or into a Unified Command situation involving agency representatives. The following definitions provide guidance in the early classification of an incident:

TIER I INCIDENT
<p>Tier I incidents are typically defined as those incidents that can be effectively managed by company responders with no assistance from outside resources.</p> <p>These incidents will typically be ?operational? incidents (i.e. valve or flange leaks, etc.) posing no threat to the environment or public. Typically, the IRT (local team) will manage Tier I incidents.</p>
TIER II INCIDENT
<p>Tier II incidents are typically defined as those incidents that can be effectively managed by company personnel with limited to moderate assistance from local, external, non-company resources.</p> <p>These incidents will typically be ?serious? incidents with the potential for moderate impact to the environment and/or public. Such incidents may include line leaks, small tank farm releases, etc. Typically, the IRT (local team) will address Tier II incidents with various levels of support and relief from the IMT (corporate team).</p>
TIER III INCIDENT
<p>Tier III incidents are typically defined as those incidents potentially requiring all company response personnel (IRT and IMT) as well as significant assistance from contracted response resources, as well as local, regional, and/or federal resource and agency involvement.</p> <p>These incidents will typically be ?catastrophic? events involving the potential for significant damage or harm to the environment and/or public. Incidents of this type may include tank collapse or other catastrophic event. Typically, the IMT (corporate team) will assume incident management with local input and operational support from IRT (local team) members.</p>

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3.2 INTERNAL NOTIFICATION PROCEDURES

The Company's internal emergency notification sequence is identified below (Also refer to the Notification Flowchart, **FIGURE 3.2-1**). Internal emergency contacts are contained in **SECTION 3.4**:

First Person Notified/On-Scene

- Immediately notify the Terminal Manager.

Terminal Management (local Incident Commander / Qualified Individual)

- Activate the Incident Response Team (IRT - local team), as the situation demands.
- Activate local emergency response resources (fire, police, medical, Oil Spill Removal Organizations (OSRO), etc.).
- Classify the incident and notify the Incident Management Team (IMT - corporate team) and other external organizations as necessary.
- As time allows, Incident Commander, or designee, will provide IMT with copy of completed Company Incident Report Form (**FIGURE 3.2-2**).
- Coordinate activation of additional response resources (including activation/mobilization of the Corporate Incident Management Team).

Incident Management Team (IMT Corporate Team)

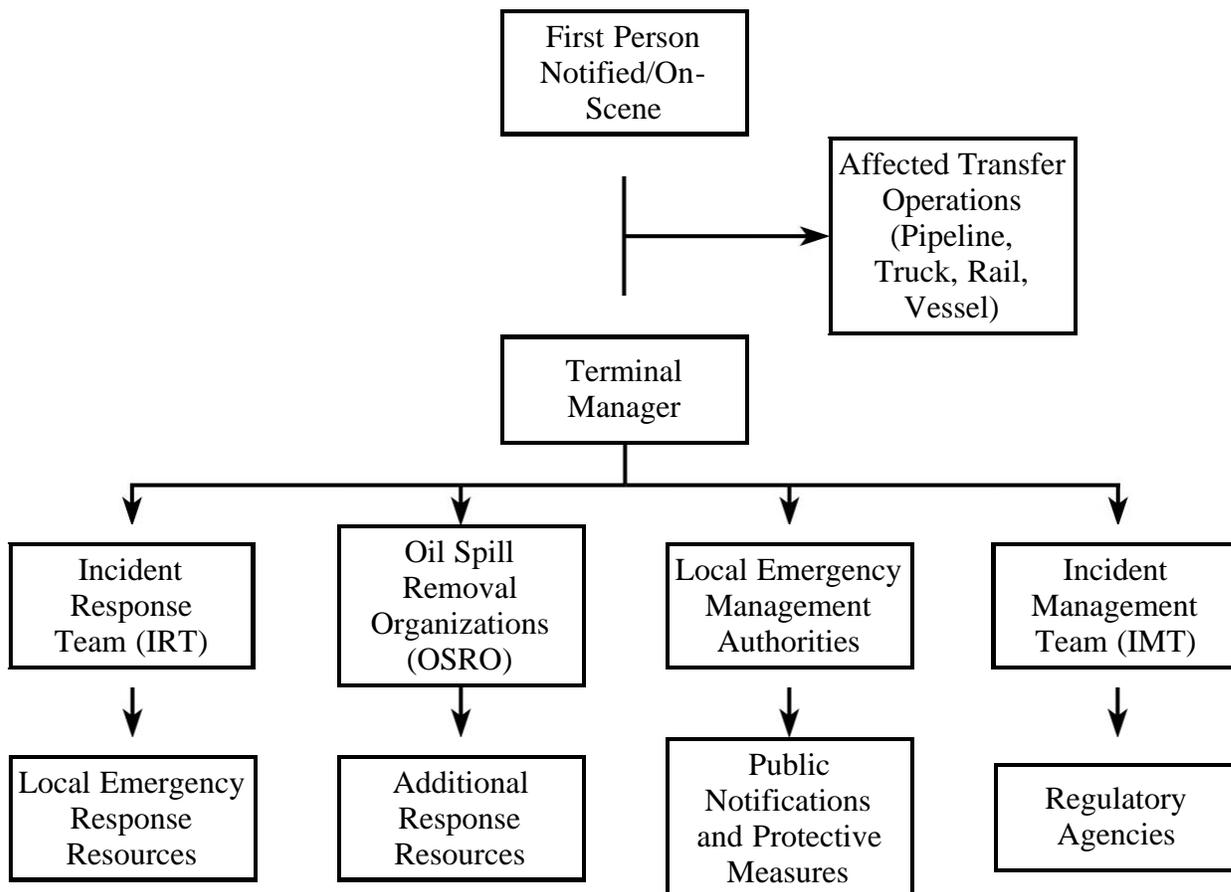
- Complete all regulatory/governmental notifications, as required.

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FIGURE 3.2-1 - NOTIFICATION FLOWCHART



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FIGURE 3.2-2 - INTERNAL INCIDENT REPORT FORM

INVOLVED PARTIES			
Reporting Party		Suspected Responsible Party	
Name:		Name:	
Phone:?	(Day)	Phone:	(Day)
?	(Evening)		(Evening)
Position:		Company:	
Company:		Organizational Type:	
Address:		<input type="checkbox"/> Private Citizen <input type="checkbox"/> Private Enterprise <input type="checkbox"/> Public Utility <input type="checkbox"/> Local Government <input type="checkbox"/> State Government <input type="checkbox"/> Federal Government	
Person Discovering Incident			
Name:			
Company/Organization:			
City:	State:	Zip:	
Were materials released? <input type="checkbox"/> Yes <input type="checkbox"/> No		Calling for Responsible Party <input type="checkbox"/> Yes <input type="checkbox"/> No	
INCIDENT DESCRIPTION			
Incident Classification: <input type="checkbox"/> Tier I <input type="checkbox"/> Tier II <input type="checkbox"/> Tier III			
Incident Factors (Check all that Apply):			
<input type="checkbox"/> Spill / Release	<input type="checkbox"/> Fire / Explosion / Vapor Release	<input type="checkbox"/> Medical	<input type="checkbox"/> Severe Weather
<input type="checkbox"/> Natural Disaster	<input type="checkbox"/> Security Related	<input type="checkbox"/> Evacuation	<input type="checkbox"/> Other
Date:	Time:	AM / PM	
Incident Address/Location:		Weather:	
		Latitude: _____ degrees _____ min _____ sec N	
		Longitude: _____ degrees _____ min _____ sec W	
Mile Post/River Marker:			
City/County:		Distance from City:	
State:		Direction from City:	
Source and Cause of Incident:			
Storage Tank Type: <input type="checkbox"/> Above Ground <input type="checkbox"/> Below Ground <input type="checkbox"/> Unknown			
Tank Capacity:		Facility Capacity:	
Pipeline Segment:		Milepost:	
MATERIAL INFORMATION			
		Released	Quantity in Water

CHRIS Code	Product Released	Quantity (Include units of measure)	(Include units of measure)

*** INITIAL NOTIFICATION SHOULD NOT BE DELAYED PENDING COLLECTION OF ALL INFORMATION
NATIONAL RESPONSE CENTER (800) 424-8802**

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FIGURE 3.2-2 - INTERNAL INCIDENT REPORT FORM, CONTINUED

INITIAL IMPACT	
Number of injuries:	Number of Deaths:
Were there Evacuations? <input type="checkbox"/> Yes <input type="checkbox"/> No	Number Evacuated:
Was there any Damage? <input type="checkbox"/> Yes <input type="checkbox"/> No	
Damage in dollars (estimate):	
Is the Spill Contained within the boundaries of the facility? <input type="checkbox"/> Yes <input type="checkbox"/> No	
Direction of Flow:	
RESPONSE ACTION(S)	
Action(s) Taken to Correct, Control or Mitigate Incident:	
ADDITIONAL INFORMATION	
Any information about the incident not recorded elsewhere in the report (e.g., duration of spill, treatment or disposal measures):	

COMPLETED NOTIFICATIONS			
Local	State	Federal	Other

*** INITIAL NOTIFICATION SHOULD NOT BE DELAYED PENDING COLLECTION OF ALL INFORMATION NATIONAL RESPONSE CENTER (800) 424-8802**

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3.3?EXTERNAL NOTIFICATION REQUIREMENTS

The following external notifications (**FIGURE 3.3-1**) should be made in accordance with federal, state, and local regulations for all reportable incidents/discharges.?The "Internal Incident Report Form" (**FIGURE 3.2-2**) should be used to facilitate documentation and data retrieval for these notifications.?Terminal Management shall ensure that the following Notifications are made as the situation demands, in consultation with Corporate ESOH. Regulatory contact numbers are contained in **SECTION 3.4**?

3.3.1 Reporting Guidelines

- Never include information which has not been verified.
- Never speculate as to the cause of an incident or make any acknowledgment of liability.
- Always Document:
 - Agency notified
 - Person notified
 - Time agency notified
 - Content of message given
- DO NOT DELAY reporting due to incomplete information.

FIGURE 3.3-1 - REGULATORY REPORTING REQUIREMENTS

The applicable regulatory notifications for this facility are as follows.

Oil Spill Removal Organization (OSRO)

Immediately for all spills that exceed the Facility's and other local response capabilities.?
FIGURE 7.1-1 details the OSRO response resources with their respective response times and
FIGURE 3.4-1 details the OSRO phone references for 24 hour contact.

National Response Center (NRC)**Verbal:**

Immediately for all spills that impact or threaten navigable water.

Written:

A written accident report will be filed within 30 days following an accident on DOT form 7000-1 in accordance with Sec. 195.50 of the U.S. Code of Federal Regulations 49 CFR. If any changes to the information reported or additions to the original report on the DOT form 7000-1 a supplemental report will be filed within 30 days.

In accordance with the applicable SPCC regulations, within 60 days to the U.S. Environmental Protection Agency for a spill in excess of 1,000 gallons (24 Bbls.) in a single event or two spill events within a twelve month period into or upon navigable waters of the United States or adjoining shorelines.

U.S. DOT Office of Pipeline Safety
400 Seventh Street, S.W., Room 7128
Washington, D.C. 20590

U.S. Environmental Protection Agency - Region 4
Emergency Response and Removal Branch
Attn: On-Scene Coordinator
61 Forsyth Street, SW
Atlanta, Georgia 30303-8909

U.S. Environmental Protection Agency - Region 6
Emergency Response and Removal Branch
Attn: On-Scene Coordinator
1445 Ross Avenue
Dallas, TX 75202-2733

Texas General Land Office (GLO)**Verbal:**

Any spills into coastal waters.
Any spills at terminal facilities.

Written:

As requested by the agency.

Texas General Land Office

2145 EMS Lane
Brownsville, TX 778521

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FIGURE 3.3-1 - REGULATORY REPORTING REQUIREMENTS, CONTINUED

The applicable regulatory notifications for this facility are as follows.

Texas Commission on Environmental Quality [TCEQ] (Austin, TX)

Verbal:

Any spills onto land or into state waters.

Written:

As requested by the agency.

Texas Commission on Environmental Quality [TCEQ]
Austin, TX

Brownsville Navigation District [BND] (Port of Brownsville)

Verbal:

Any spills onto BND land or into the Ship Channel

return

Written:

As requested by the BND or pertaining to Reportable Quantities for hazardous substances.

Brownsville Navigation District [BND] (Port of Brownsville)
Attn: Deputy Port Director
1000 Foust Road
Brownsville, TX 778521

Local Emergency Planning Committee (LEPC)

Verbal:

For any spill which escapes the boundary of the Facility.

Cameron County (LEPC)

Occupational Safety and Health Administration (OSHA)

Immediately for incidents involving three (3) or more hospitalizations or one (1) or more deaths. In those cases that demand a response to OSHA regulation, Form 101 shall be completed, and Form 200 shall be posted annually.

U.S. Environmental Protection Agency (EPA)

Immediately for all spills that impact or threaten navigable water or adjoining shoreline. Notification to the EPA is typically accomplished by the call to the NRC.

US Fish and Wildlife Service (USFWS)

Immediately for Wildlife Protection/Rehabilitation

Local Emergency Services

Immediately for all Police, Fire, and Medical Emergencies

Police Department

Fire Department

Ambulance Service

Wildlife Rehabilitation Resources

Neighbors

Directly or with assistance from local police and fire agencies and/or the Port Authority, inform all adjacent businesses and private citizens that might be immediately impacted.

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3.4 NOTIFICATIONS AND TELEPHONE NUMBERS

FIGURE 3.4-1 - NOTIFICATIONS AND TELEPHONE NUMBERS

*24 Hour Number

AFFILIATION	PHONE NUMBER	TIME CONTACTED
A. COMPANY PERSONNEL		
Terminal Personnel		
Kevin Garcia General Manager- Brownsville TX	(956) 831-3531 (Office) (b) (6) (956) 371-3916* (Mobile)	
Carlos Arizmendi Operations Manager- Brownsville TX	(956) 831-3531 (Office) (956) 592-1660* (Mobile)	
Melchor "Malcom" Casas Area Safety Coordinator	(956) 554-4036 (Office) (b) (6) (956) 371-7748* (Mobile)	
Corporate IMT Personnel		
Ed Luebke Vice President, Pipeline Operations- Atlanta Office	(770) 518-3586 (956) 831-3531 (Office) (b) (6) (678) 772-1285* (Mobile)	
Andy McClish Manager, Reg. Compliance- Atlanta Office	(770) 518-3701 (Office) (b) (6) (678) 488-4524* (Mobile)	
Jim Dugan Sr. Vice President, Operations & Engineering- Atlanta Office	(770) 518-3760 (Office) (b) (6) (678) 427-9321* (Mobile)	
Brian Temples Director, Safety- Atlanta Office	(770) 518-3756 (Office) (706) 252-0282* (Mobile)	
Karl Bernard Director, Operations- Atlanta Office	(770) 518-3655 (Office) (b) (6) (954) 931-7194* (Mobile)	

Jim Sligh Environmental Specialist- Atlanta Office	(770) 518-3662 (Office) (b) (6) (404) 867-6395* (Mobile)	
Tommy Jordan Director, Operations- Atlanta Office	(770) 518-3588 (Office) (b) (6) (678) 427-9325* (Mobile)	
Doug Hall Director, Reg. Compliance- Denver Office	(303) 626-8218 (Office) (b) (6) (720) 201-0964* (Mobile)	

For further guidance, refer to the current version of the TransMontaigne *Internal Notification Procedure* (located on the SAP Portal).

Refer to **APPENDIX A, FIGURE A.2-3** for personnel training records

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3.4 NOTIFICATIONS AND TELEPHONE NUMBERS , CONTINUED

FIGURE 3.4-1 - NOTIFICATIONS AND TELEPHONE NUMBERS , CONTINUED

*24 Hour Number

AFFILIATION	PHONE NUMBER	TIME CONTACTED
A. COMPANY PERSONNEL		
Corporate IMT Personnel		
Steve McNelly General Mgr., Operations- Atlanta Office	(770) 518-3753 (Office) (b) (6) (678) 910-1510* (Mobile)	
Dudley Tarlton Vice President, ESOH- Denver Office	(303) 626-8200 [8219] (Office) (b) (6) (720) 308-8596* (Mobile)	
Greg Pound President, C.O.O. - Atlanta Office	(770) 518-3707 (Office) (b) (6) (404) 386-5426* (Mobile)	
Cliff Zapp Director, QA/QC- Atlanta Office	(770) 518-3821 (Office) (b) (6) (770) 335-5898* (Mobile)	
Pipeline/SCADA Control Center Operator On Duty- Atlanta Office	(800) 732-8140* (Office)	

For further guidance, refer to the current version of the TransMontaigne *Internal Notification Procedure* (located on the SAP Portal).

Refer to **APPENDIX A, FIGURE A.2-3** for personnel training records

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FIGURE 3.4-1 - NOTIFICATIONS AND TELEPHONE NUMBERS, CONTINUED

*24 Hour Number

AFFILIATION	PHONE NUMBER	TIME CONTACTED
Initial		
National Response Center (Washington DC)	(800) 424-8802* (202) 267-2675* (202) 267-2180	
Cameron County (LEPC)	(956) 547-7000 (956) 547-7006	
Texas General Land Office [GLO] / Commission on Environmental Quality [TCEQ] (Austin TX)	(800) 832-8224*	
Texas General Land Office- GLO (Corpus Christi TX))	(800) 832-8224* (361) 549-5310* (956) 504-1417	
Recommended		
Federal Agency(s)		
OSHA [reportable injury or death] (Washington DC)	(800) 321-6742*	
U.S. Fish and Wildlife Service (Houston TX)	(281) 286-8282	
US EPA Regional Office- Region 6 (Dallas TX)	(866) 372-7745* (214) 665-2200	
USCG Captain of the Port (Brownsville MSO) 2993 N. Indiana Ave., Ste. A, Brownsville, TX 78521	(956) 832-0517* (956) 832-0743 (fax)	
USCG Captain of the Port (Corpus Christi MSO) 555 N. Carancahua, Ste. 500, Corpus Christi, TX 78478	(361) 888-3162 (800) 434-9486 (361) 888-3231 (fax)	
State Agency(s)		
Texas Parks & Wildlife Department (Austin TX)	(512) 389-4726 (512) 389-4848*	
Texas Railroad Commission	(512) 463-6788* (Austin TX) (713) 869-5001 (361) 242-3113	
Local Agency(s)		
Brownsville City Hall	(956) 548-6000	

Brownsville City Manager	(956) 548-6008	
Brownsville Navigation District- Port of Brownsville	(956) 831-8256* (956) 831-4592*	
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FIGURE 3.4-1 - NOTIFICATIONS AND TELEPHONE NUMBERS, CONTINUED

*24 Hour Number

AFFILIATION	PHONE NUMBER	TIME CONTACTED
Local Agency(s)		
Harbormaster's Office- Port of Brownsville	(956) 831-8256*	
Highway Department	(956) 542-2260	
Fire Department(s)		
Fire Chief	911*	
Fire Department	911* (956) 546-3195	
Emergency Medical Service(s)		
Harlingen Medical Center	(956) 389-1000	
Valley Baptist Medical Center (Brownsville)	(956) 698-5400*	
Valley Baptist Medical Center (Harlingen)	(956) 389-1100	
Valley Regional Medical Center/Ambulance Service (Brownsville)	911* (956) 350-7000*	
Police Department(s)		
Brownsville Police Dept. 600 E. Jackson St., Brownsville, TX 78520	911* (956) 548-7000*	
Cameron County Sherriff's Dept. 7300 Old Alice, Olmito, TX 78575	911* (956) 544-0860*	
Texas State Highway Patrol (McAllen TX)	(956) 984-5608 (956) 984-5621*	
Other Service Provider(s)		

AON Risk Service (Insurance Claims)	(832) 476-6000 (832) 476-6990 (847) 953-6806	
Cardno ENTRIX (NRDA issues- Houston TX)	(713) 666-6223 (800) 368-7511	
Chemtrec/Chemical Referral Center (Washington DC)	(800) 424-9300* (800) 262-8200*	

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FIGURE 3.4-1 - NOTIFICATIONS AND TELEPHONE NUMBERS, CONTINUED

*24 Hour Number

AFFILIATION	PHONE NUMBER	TIME CONTACTED
Other Service Provider(s)		
International Bird Rescue Center (Fairfield CA)	(707) 207-0380 (888) 447-1743	
Marine Services (Port Isabel TX)	(956) 943-5041*	
Miller Environmental Services- Spill Response (Corpus Christi TX)	(800) 929-7227* (361) 289-9800	
Tri-State Bird Rescue/ Research (Newark DE)	(302) 737-9543 (800) 710-0695* (Pgr)	
U.S. Humane Society (Washington DC)	(202) 452-1100	
Wildlife Rehab. & Education (Houston TX)	(713) 861-9453 [Main] (281) 332-8319 [Director] (832) 654-0856 [Oil Response] (281) 731-8826 [Oil Response]	
Witt-O'Brien's - Crisis Management (New Orleans/ Houston)	(985) 781-0804* (281) 320-9796*	
Weather Information		
Brownsville Weather Office	(956) 546-5377 (956) 546-5378	
Television Station(s)		
KGBT-TV, Channel 4 - CBS	(956) 541-5822 (956) 546-2233 (fax)	
KLUJ-TV, Channel 44 - TBN	(956) 425-4225	

	(956) 412-1740 (fax)	
KMBH-TV, Channel 60 - PBS	(956) 421-4111 (956) 421-4150	
KRGV-TV, Channel 5 - ABC	(956) 428-5555 (956) 973-5002	
KVEO-TV, Channel 23 - UPN	(956) 544-2323 (956) 544-4636 (fax)	
Radio Station(s)		
KBNR Radio - 88.3 FM	(956) 542-6933 (956) 542-0523	
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FIGURE 3.4-1 - NOTIFICATIONS AND TELEPHONE NUMBERS, CONTINUED

*24 Hour Number

AFFILIATION	PHONE NUMBER	TIME CONTACTED
Radio Station(s)		
KGBT Radio - 1530 AM; 98.5 FM	(956) 631-5499 (956) 631-0090 (fax)	
KHID Radio - 88.1 FM; KMBH Radio - 88.9 FM	(956) 421-4111 (956) 421-4150 (fax)	
KTEX Radio - 100.3 FM	(866) 973-1041 (965) 421-2582 (fax)	
KZSP Radio - 95.3 FM; KESO Radio - 92.7 FM	(956) 761-2270 (956) 761-1656	
Newspaper(s)		
Brownsville Herald	(956) 542-4301 (956) 542-0840	
The Monitor	(956) 686-4343	
Valley Morning Star	(956) 423-5511 (956) 430-6233	
Neighboring Business(s)		
A Clean Portaco (adjacent facility- Southwest, N. Side)	(956) 831-5262	

Citgo Terminal (adjacent facility- South, S. Side)	(956) 831-8241	
Interlube Corp (adjacent facility- East, N. Side)	(956) 831-4046	
Port of Brownsville Recycling (adjacent facility- West, N. Side)	(956) 831-6707	
RTW Terminal (adjacent facility- East, N. Side)	(956) 831-7117	
Signet Maritime Corp. (adjacent facility- West, N. Side)	(936) 838-6800	
US Clay & Minerals (adjacent facility- West, S. side)	(956) 831-8140	

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FIGURE 3.4-1 - NOTIFICATIONS AND TELEPHONE NUMBERS, CONTINUED

*24 Hour Number

AFFILIATION	PHONE NUMBER	TIME CONTACTED
Waste Disposal / Recycle Facilities		
Aaron Oil Co., Inc. (Saraland AL)	(800) 239-4549 (251) 479-1616	
Allied Energy Corporation (Birmingham AL)	(205) 925-6600* (877) 713-7515	
BFI Waste Systems (Jackson MS)	(800) 523-6437	
BFI Waste Systems (LeLand, MS)	(662) 335-1014	
USCG Classified OSRO's		
Garner Environmental Services, Inc. Deer Park, TX	(281) 930-1200 (800) 424-1716*	
Oil Mop, LLC Pasadena, TX	(713) 534-7300 (800) 645-6671*	
U.S. Environmental Services, LLC Laredo, TX	(877) 398-9911 (888) 279-9930*	
SWS Environmental Services Cibolo, TX	(210) 566-8366 (877) 742-4215*	
TAS Environmental Services, LP	(210) 496-5310 (888) 654-0111*	

San Antonio, TX		
Non-Classified OSRO's		
R.M. Walsdorf Brownsville, TX	(956) 831-3984 (956) 592-1624*	
Chemical Response & Remediation Harlingen, TX	(866) 437-2772* (956) 365-4252	
Aerial Surveillance Resources		
Barr Air Patrol 1442 Airport Blvd, Ste. 11 Mesquite, TX	(972) 222-0229	
Gulf Aviation 5001 Bodenhamer Ave. Harlingen, TX	(956) 423-7317	
Southmost Aviation, Inc. 973 S. Minnesota Ave. Brownsville, TX	(956) 542-5852	

SECTION 4

RESPONSE TEAM ORGANIZATION

4.1 Response Team Description

4.2 Activation Procedures

4.3 Team Member Response Times

4.4 Unified Command System

4.5 Qualified Individual (QI)

Figure 4-1 - Response Team Activation Procedure

Figure 4-2 - Response Team Organizational Chart

4.6 Response Team Job Description Checklists

4.6.1 Incident Command Job Description Checklist

4.6.2 Information Officer Job Description Checklist

4.6.3 Safety Officer Job Description Checklist

4.6.4 Liaison Officer Job Description Checklist

4.6.5 Legal Officer Job Description Checklist

4.6.6 Operations Section Chief Job Description Checklist

4.6.7 Planning Section Chief Job Description Checklist

4.6.8 Logistics Section Chief Job Description Checklist

4.6.9 Finance Section Chief Job Description Checklist

4.1 RESPONSE TEAM DESCRIPTION

The Company has developed its emergency response organization around the Incident Command System (ICS), which provides the structure for effective management of response resources. The response team is activated and mobilized in accordance with the size and complexity of the Incident. The Company's emergency response structure is based on a two-tiered organization. The first tier is the Incident Response Team (IRT), comprised of local facility personnel. The second tier is the Incident Management Team (IMT), comprised of corporate personnel. When activated, some positions on the IMT may be filled by local facility personnel.

- **Incident Response Team (IRT)**

The IRT is comprised of local, on-site company personnel, who are responsible for initial response to Tier I, II, or III incidents (refer to **SECTION 3.1**). The IRT includes a Qualified Individual and Incident Commander, Command Staff and Section Chief positions.

- **Incident Management Team (IMT)**

The IMT is comprised of corporate personnel, who are responsible for support and incident management of Tier II, or III incidents (refer to **SECTION 3.1**). The IMT includes a Qualified Individual and Incident Commander, Command Staff and Section Chief positions.

Response team contacts are listed in **FIGURE 3.4-1**. Job descriptions for each team member are provided in **SECTION 4.6**. Response team training is contained in **APPENDIX A**.

4.2 ACTIVATION PROCEDURES

Activation of the response team organization may be accomplished in stages as illustrated in **FIGURE 4-1** and described below:

- First Person notified/on-scene notifies Facility Manager/Qualified Individual.
- Facility Manager/Qualified Individual assumes role of IRT Incident Commander (IC).
- IC activates local IRT positions, as necessary.
- IC classifies incident, and determines if IMT activation is necessary.
- IC notifies IMT Incident Commander.
- IMT IC notifies Section Chiefs and Command Staff.
- IMT Section Chiefs and Command Staff notify necessary personnel.
- IMT mobilizes to incident location.
- IRT IC briefs IMT upon arrival at Command Post.
- IMT IC assumes command.
- IC and Section Chiefs continually assess staffing needs.
- IC activates additional IMT personnel, if needed.
- IC de-activates IMT personnel that are not needed.

4.3 TEAM MEMBER RESPONSE TIMES

The IMT including the IC will report to the Corporate EOC (Atlanta Office) initially.

IRT will mobilize to the facility command post with an expected maximum arrival time of 1-2 hours.

4.4 UNIFIED COMMAND SYSTEM

The Unified Command System (UCS) is the accepted method for organizing regulatory entities within the Incident Command System. The primary entities include:

- Federal On-Scene Coordinator
- State On-Scene Coordinator
- Company Incident Commander (Responsible Party IC)

These three persons 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 and integrated Incident Management Team.

4.5 QUALIFIED INDIVIDUAL (QI)

The QI and or designated alternate has the following responsibilities and authorities as required by the Oil Pollution Act of 1990 (40 CFR Parts 9 and 112):

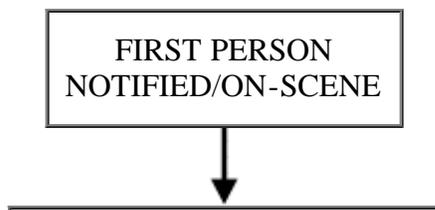
- Be available on a 24-hour basis and able to arrive at the facility in a reasonable time
- Reside in the United States, speak fluent English, and be familiar with the implementation of this Plan
- Activate internal alarms and hazard communication systems to notify all appropriate personnel
- Notify all response personnel as needed
- Identify character, exact source, amount and extent of the release and other necessary items needed for notifications
- Notify and provide information to appropriate Federal, State and Local authorities
- Assess the interaction of the spilled substance with water and/or other substances stored at the Facility and notify on-scene response personnel of assessment
- Assess possible hazards to human health and the environment
- Coordinate rescue and response actions
- Assess and implement prompt removal actions
- Access company funds to initiate cleanup activities; i.e., activate and contract with OSRO's
- Direct cleanup activities until properly relieved of responsibility or incident is terminated

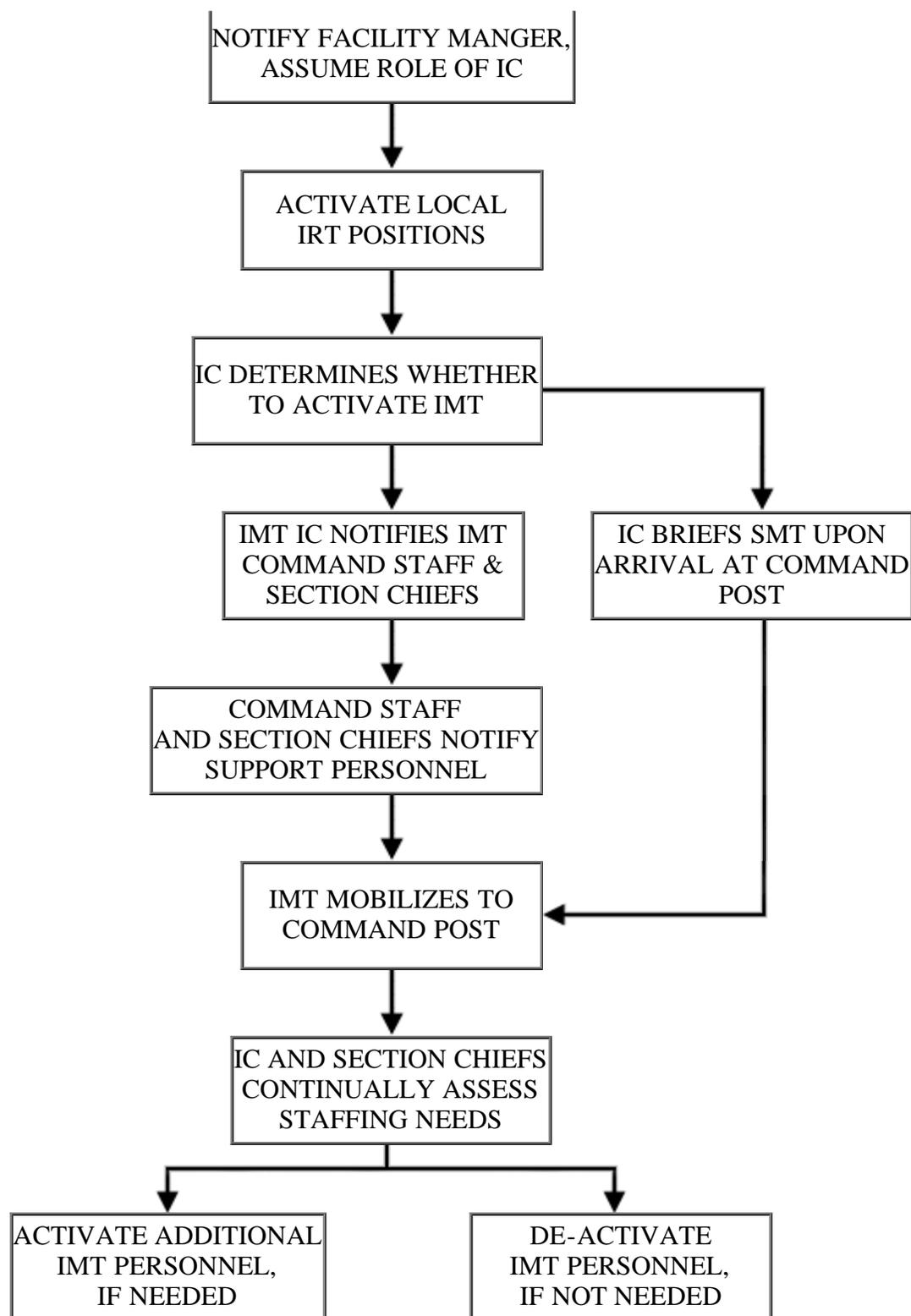
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FIGURE 4-1 - RESPONSE TEAM ACTIVATION PROCEDURE



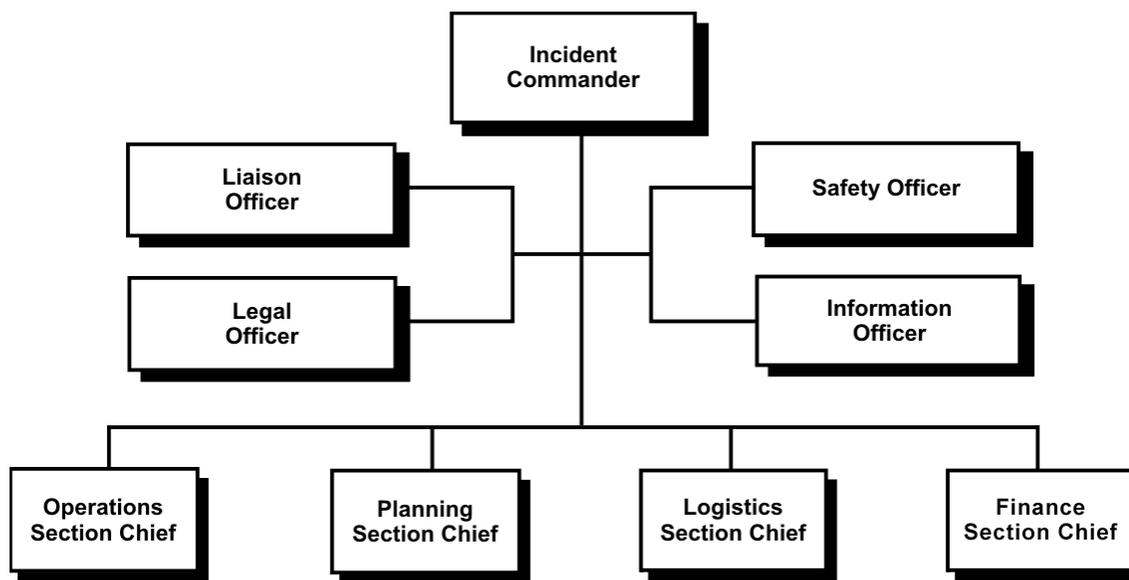


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FIGURE 4-2 - RESPONSE TEAM ORGANIZATIONAL CHART



Note: Refer to **FIGURE 3.4-1** for IRT/IMT Team Member contacts

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4.6 RESPONSE TEAM JOB DESCRIPTION CHECKLISTS

The following job description checklists are intended to be used as a tool to assist IRT/IMT members in their particular positions within the Incident Command System (ICS).

4.6.1 Incident Commander

4.6.2 Information Officer

4.6.3 Safety Officer

4.6.4 Liaison Officer

4.6.5 Legal Officer

4.6.6 Operations Section Chief

4.6.7 Planning Section Chief

4.6.8 Logistics Section Chief

4.6.9 Finance Section Chief

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4.6.1 Incident Commander Job Description Checklist

For oil discharges, the **Incident Commander** will be organized within the Unified Command structure which includes, but is not limited to:

- The predesignated Federal On Scene Coordinator (FOSC) acting under the authority of the National Contingency Plan (NCP)
- The predesignated State On Scene Coordinator (SOSC) representing state and local response agencies
- The representation of the Responsible Party (RP)

The Unified Command is responsible for the overall management of the incident. The Unified Command directs incident activities including the development and implementation of strategic decisions and approves the ordering and releasing of resources. The Unified Command may activate Deputy Incident Commanders to assist in carrying out Incident Command responsibilities.

INCIDENT COMMANDER	COMMENT
Assume Command. Assess the situation and/or obtain incident briefing from prior Incident Commander.	
Establish an Incident Command Post.	
Activate additional IRT personnel, as necessary.	
Request additional response resources, as necessary.	
Classify the incident, and complete internal notifications.	
Determine Incident Objectives and Strategies in accordance with Area Contingency Plan(s) (ACP).	
Establish the immediate priorities.	
Brief Command Staff and Section Chiefs.	
Coordinate regulatory notification with Corporate ESOH Department.	
Ensure Planning Meetings are scheduled as required.	
Approve and authorize the implementation of an Incident Action Plan.	
Determine information needs and advise Command and General Staff.	
Coordinate activity for all Command and General Staff.	
Manage incident operations.	
Approve requests for additional resources and requests for release of resources.	
Approve the use of trainees, volunteers and auxiliary personnel.	
Authorize release of information to news media.	
Ensure incident funding is available.	
Notify Natural Resource Damage Assessment (NRDA) and coordinate NRDA Team.	
Coordinate incident investigation responsibilities.	
Seek appropriate legal counsel.	

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4.6.1 Incident Commander Job Description Checklist, Continued

INCIDENT COMMANDER	COMMENT
Order demobilization of the incident when appropriate.	
Ensure completion of final incident documentation and reports.	
Coordinate Post Incident Review.	

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The **Information Officer**, a member of the Command Staff, is responsible for developing information about the incident for release to the news media, to incident personnel, and to other appropriate agencies and organizations.

Only one Information Officer will be assigned for each incident, including incidents operating within Unified Command or multi-jurisdictional incidents. The Information Officer may have assistants as necessary and the assistants may also represent assisting agencies or jurisdictions if warranted.

INFORMATION OFFICER	COMMENT
Review the Company's <i>News Media Inquiry Policy</i> * and consult with the Incident Commander to identify specific guidance and limitations governing the release of information.	
Develop material for use in media briefings.	
Obtain approval from Incident Commander and designated Company personnel for media releases.	
Assist designated Company personnel in coordinating media interviews, briefings, and/or tours as necessary.	
Obtain media information that may be useful to incident planning.	
Maintain current information summaries and/or displays of the incident and provide information on the status of the incident to incident personnel.	
Participate in Post Incident Review.	

*The current version of this document is available on the Company's SAP Portal (Documents/Public Documents/ESOH).

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The **Safety Officer**, a member of the Command Staff, is responsible for monitoring and assessing hazardous and unsafe situations and developing measures for assuring personnel safety. The Safety Officer will correct unsafe acts or conditions through the regular line of authority, although the Officer may exercise emergency authority to stop or prevent unsafe acts when immediate action is required. The Safety Officer maintains awareness of active and developing situations, ensures the preparation and implementation of the Site Safety Plan and includes safety messages in each Incident Action Plan.

SAFETY OFFICER	COMMENT
Identify hazardous or unsafe situations associated with the incident by ensuring the performance of preliminary and continuous site characterization and analysis which shall include the identification of all actual or potential physical, biological and chemical hazards known or expected to be present on site.	
Participate in Planning Meetings to identify any health and safety concerns inherent in the operations daily workplan.	
Review the Incident Action Plan for safety implications.	
Exercise emergency authority to stop and prevent unsafe acts.	
Investigate accidents that have occurred within the incident areas.	
<p>Ensure the preparation and implementation of the Site Specific Health and Safety Plan (HASP) in accordance with the Area Contingency Plan (ACP) and State and Federal OSHA regulations. The HASP shall at minimum address, include or contain the following elements:</p> <ul style="list-style-type: none"> • Health and Safety hazard analysis for each site task or operation • Comprehensive operations work plan • Personnel training requirements • PPE selection criteria • Site specific occupational medical monitoring requirements • Air monitoring plan: area/personal • Site control measures • Confined space entry procedures "only if needed" • Pre-entry briefings (tailgate meetings) initial and as needed • Pre-operations health and safety conference for all incident participants • Quality assurance of HASP effectiveness 	
Assign assistants and manage the incident safety organization.	
Review and approve the Medical Plan.	
Participate in Post Incident Review.	

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4.6.4 Liaison Officer Job Description Checklist

Incidents that are multi-jurisdiction, or have several agencies involved, may require the establishment of the Liaison Officer position on the Command Staff.

LIAISON OFFICER	COMMENT
Provide a point of contact for assisting and cooperating Agency Representatives.	
Identify Agency Representatives from each agency including communications link and location.	
Maintain a list of assisting and coordinating interagency contacts.	
Assist in establishing and coordinating interagency contacts.	
Keep agencies supporting incident aware of incident status.	
Monitor incident operations to identify current or potential inter-organizational issues and advise Incident Commander as appropriate.	
Participate in Planning Meetings, provide current resource status information, including limitations and capabilities of assisting agency resources.	
Participate in Post Incident Review.	

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4.6.5 Legal Officer Job Description Checklist

The **Legal Officer** is a member of the Command Staff, and is responsible for advising on all legal matters and potential liability issues.

LEGAL OFFICER	COMMENT
Review Common Responsibilities.	
Participate in Planning Meetings if requested.	
Advise Unified Command on legal/liability issues relating to implementation of response tactics (i.e; in-situ burning, use of dispersants and other alternative response tactics and technologies).	
Advise Unified Command on legal issues relating to Natural Resource Damage Assessment (NRDA).	
Advise Unified Command on legal issues relating to investigation.	
Advise Unified Command on legal issues relating to finance and claims.	
Advise Unified Command on response related issues.	
Participate in Post Incident Review.	

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4.6.6 Operations Section Chief Job Description Checklist

The Operations Section Chief, a member of the General Staff, is responsible for the management of all operations directly applicable to the primary mission. The Operations Section Chief activates and supervises elements in accordance with the Incident Action Plan and directs its execution; activates and executes the Site Safety Plan; directs the preparation of

Unit operational plans, requests or releases resources, makes expedient changes to the Incident Action Plan as necessary and reports such to the Incident Commander.

OPERATIONS SECTION CHIEF	COMMENT
Develop operations portion of Incident Action Plan.	
Brief and assign operations personnel in accordance with Incident Action Plan.	
Supervise the execution of the Incident Action Plan for Operations.	
Request resources needed to implement the Operations tactics as part of the Incident Action Plan development (ICS 215).	
Ensure safe tactical operations.	
Make or approve expedient changes to the Incident Action Plan during operational period as necessary.	
Approve suggested list of resources to be released from assigned status (not released from the incident).	
Assemble and disassemble Strike Teams/Task Forces assigned to Operations Section.	
Report information about changes in the implementation of the IAP, special activities, events and occurrences to Incident Commander as well as to Planning Section Chief and Information Officer.	
Participate in Post Incident Review.	

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4.6.7 Planning Section Chief Job Description Checklist

The Planning Section Chief, a member of the General Staff, is responsible for the collection, evaluation, dissemination and use of information about the development of the incident and status of resources. Information is needed to:

- Understand the current situation
- Predict probable course of incident events
- Prepare alternative strategies for the incident

PLANNING SECTION CHIEF	COMMENT
Activate Planning Section Units.	
Assign available personnel already on site to ICS organizational positions as appropriate.	
Collect and process situation information about the incident.	
Supervise preparation of the Incident Action Plan.	
Provide input to the Incident Command and Operations Sections Chief in preparing the Incident Action Plan.	
Participate in planning and other meetings as required.	
Establish information requirements and reporting schedules for all ICS	

organizational elements for use in preparing the Incident Action Plan.	
Determine need for any specialized resources in support of the incident.	
Provide Resources Unit with the Planning Section's organizational structure including names and locations of assigned personnel.	
Assign Technical Specialists where needed.	
Assemble information on alternative strategies.	
Assemble and disassemble Strike Teams and Task Forces as necessary.	
Provide periodic predictions on incident potential.	
Compile and display Incident Status Summary information.	
Provide status reports to appropriate requesters.	
Advise General Staff of any significant changes in incident status.	
Incorporate the incident Traffic Plan (from Ground Support Unit), Vessel Routing Plan (from Vessel Support Unit) and other supporting plans into the Incident Action Plan.	
Instruct Planning Section Units in distribution and routing of incident information.	
Prepare recommendations for release of resources for submission to members of Incident Command.	
Maintain Section record.	
Participate in Post Incident Review.	

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4.6.8 Logistics Section Chief Job Description Checklist

The Logistics Section Chief, a member of the General Staff, is responsible for providing facilities, services, material, etc. in support of the response effort. The Logistics Section Chief participates in development and implementation of the Incident Action Plan and activates and supervises Branches and Units within the Logistics Section.

LOGISTICS SECTION CHIEF	COMMENT
Plan organization of Logistics Section.	
Assign work locations and preliminary work tasks to Section personnel.	
Notify Resources Unit of Logistics Section Units activated including names and locations of assigned personnel.	
Assemble and brief Branch Directors and Unit Leaders.	
Participate in preparation of Incident Action Plan.	
Identify service and support requirements for planned and expected operations.	
Provide input to and review Communications Plan, Medical Plan, Traffic Plan and Vessel Routing Plan.	
Coordinate and process requests for additional resources.	

Review Incident Action Plan and estimate Section needs for next operational period.	
Advise on current service and support elements of the Incident Action Plan.	
Prepare service and support elements of the Incident Action Plan.	
Estimate future service and support requirements.	
Receive Demobilization Plan from Planning Section.	
Recommend release of Unit resources in conformance with Demobilization Plan.	
Ensure general welfare and safety of Logistics Section personnel.	
Participate in Post Incident Review.	

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4.6.9 Finance Section Chief Job Description Checklist

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

FINANCE SECTION CHIEF	COMMENT
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.	

SECTION 5

RESPONSE EQUIPMENT

5.1 Response Resources

5.1.1 Response Equipment

Figure 5.1-1 - Regional Company and Response Contractor's
Equipment List / Response Time

5.1.2 Response Equipment Inspection and Maintenance

5.1.3 Contractors, Contractor Equipment, and Labor

5.2 Incident Facilities and Communications

5.2.1 Command Post

Figure 5.2-1 - Command Post Checklist

5.2.2 Staging Area

5.2.3 Communications Plan

Figure 5.2-2 - Communications Checklist

5.3 Site Security Measures

Figure 5.3-1 - Site Security Checklist

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5.1 RESPONSE RESOURCES

5.1.1 Facility Response Equipment

BOOM				
TYPE/MODEL/YEAR	QUANTITY	SIZE	CONTAINMENT AREA (sq ft)	STORAGE LOCATION
2008	200 ft.	6" float/ 12" skirt	variable	Border Terminal (4300 Series) Warehouse
SORBENTS				
TYPE/YEAR	QUANTITY	ABSORPTION CAPACITY (gal)	STORAGE LOCATION	OPERATIONAL STATUS
Misc. pads, boom, and/or granular	Unspecified	Unspecified	Office & warehouse buildings (as indicated on Figs. 1-8)	Readily accessible by facility personnel
HAND TOOLS				
TYPE/YEAR	QUANTITY	STORAGE LOCATION	OPERATIONAL STATUS	
Shovels, rakes, gloves, etc.	Typical for facility	Storage & warehouse buildings (as indicated on Figs. 1-8)	Readily accessible by facility personnel	
FIRE FIGHTING AND PERSONNEL PROTECTIVE EQUIPMENT				
TYPE/YEAR	QUANTITY	STORAGE LOCATION	OPERATIONAL STATUS	
Portable fire extinguishers, basic PPE	Unspecified	Throughout facility complex	Readily accessible by facility personnel	

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5.1 RESPONSE RESOURCES

5.1.1 Response Equipment

Company and Contractor response equipment is provided in **FIGURE 5.1-1**.

FIGURE 5.1-1 - REGIONAL COMPANY AND RESPONSE CONTRACTOR'S

EQUIPMENT LIST / RESPONSE TIME

* USCG Classified OSRO

COMPANY/CONTRACTOR	EQUIPMENT	RESPONSE TIME
R.M. Walsdorf Brownsville , TX	Containment boom, boats, vac trucks, response trailers, sorbent materials, personnel	0.5 hour(s)
Chemical Response & Remediation Harlingen , TX	Containment boom, boats, vac trucks, response trailers, sorbent materials, personnel	1 hour(s)
* Garner Environmental Services, Inc. Deer Park , TX	Full response capabilities (per USCG classif.)	1 hour(s)
* Oil Mop, LLC Pasadena , TX	Full response capabilities (per USCG classif.)	1 hour(s)
* U.S. Environmental Services, LLC Laredo , TX	Full response capabilities (per USCG classif.)	4 hour(s)
* SWS Environmental Services Cibolo , TX	Full response capabilities (per USCG classif.)	6 hour(s)
* TAS Environmental Services, LP San Antonio , TX	Full response capabilities (per USCG classif.)	6 hour(s)

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5.1.2 Response Equipment Inspection and Maintenance

Response equipment inspections will be preformed and documented using **FIGURE A.2-4**. OSRO supplied equipment, maintenance and deployment records are maintained separately at the facility.

Note: If this facility only maintains disposable response supplies (i.e, absorbent materials), for use in initial spill mitigation efforts, then this table will not be completed. Refer to **FIGURE 7.1-1** for a listing of response resources maintained at or by the Facility.

5.1.3 Contractors, Contractor Equipment, and Labor

- The Company's primary response contractors' names and phone numbers, as well as other companies who can provide spill response services are provided in **SECTION 3**
- The Company has ensured by contract the availability of private personnel and equipment necessary to respond, to the maximum extent practicable, to the worst case discharge or the substantial threat of such discharge
- **APPENDIX B** contains evidence of contracts for the Company's primary response contractors

5.2 INCIDENT FACILITIES AND COMMUNICATIONS

5.2.1 Command Post

In the event of a major spill, a Unified Command Post will be established. For a minor spill, only a Command Post will be established. Refer to **FIGURE 5.2-1** for guidelines in establishing a Command Post.

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FIGURE 5.2-1 - COMMAND POST CHECKLIST

COMMAND POST CHECKLIST	INITIALS	DATE/TIME STARTED	DATE/TIME COMPLETED
Ensure adequate space for size of staff.			
Ensure 24-hour accessibility.			
Ensure personal hygiene facilities.			
Ensure suitability of existing communications resources (phone/fax/radio).			
Ensure suitability of private conference and briefing rooms.			
Identify Command Post security requirements, safe location.			
Notify other parties of Command Post location; provide maps/driving directions.			
Determine staging areas and incident base locations.			
Identify future need to move, upgrade facilities.			

5.2.2 Staging Area

In a major spill response, numerous staging areas may be required to support containment and clean-up operations.

In selecting a suitable staging area, the following criteria should be considered:

- Accessibility to impacted areas
- Proximity to secure parking, airports, docks, pier, or boat launches
- Accessibility to large trucks and trailers which may be used to transfer equipment

In addition, the staging area should:

- Be in a large open area in order to provide storage for equipment and not interfere with equipment loading and offloading operations
- Have a dock/pier on site for deploying equipment

- Have moorage available for vessels to aid the loading/offloading of personnel

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5.2.3 Communications Plan

Company-owned communications equipment and quantities commonly used to address response communications are listed below:

FACILITY COMMUNICATIONS SUMMARY
Facility Communications:
<p>Primary Method(s): Portable radios (19 hand-held and 4 vehicle-mounted) will serve as the primary means of communication at this facility.</p> <p>Base stations (range 10 miles) are located in the Southwest and Brownsville terminal offices.</p> <p>All radio equipment is used and tested as a part of day-to-day operations. Equipment defects will be detected in a timely fashion and repairs/ replacements made as needed.</p> <p>Alternate Method(s): Channel 81, 157.075 MHZ, VHS-FM has been designated for use by mobile stations involved in response activities.</p> <p>Pager and answering services.</p> <p>Electronic mail (E-mail) via Company computer network.</p>
At Remote Locations Covered by Response Plan:
<p>Location: All Method(s): Mobile phone</p>
Contractor or Cooperative Additional Communication Package(s), if any.
n/a

Normal Company communications at each facility are conducted via telephone lines, cellular telephones, two way radios, e-mail, and fax machines.

Additional communications equipment (VHF portable radios with chargers and accessories, command post with UHF, VHF, single sideband, marine, aeronautical, telephone, and hard-line capability) may be provided by the Company or leased from a communications company in the area. Communications with government agencies, state police, and contractors can be conducted on portable radios. Refer to **FIGURE 5.2-2** for guidelines to setup communications.

It is the responsibility of the Qualified Individual to provide an adequate communications system.

The Communications Plan, written at the time of an incident, will identify telephone numbers and radio frequencies used by responders. This may also involve activation of multiple types of communications equipment and coordination among multiple responding agencies and contractors.

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FIGURE 5.2-2 - COMMUNICATIONS CHECKLIST

COMMUNICATIONS CHECKLIST	INITIALS	DATE/TIME STARTED	DATE/TIME COMPLETED
Develop a Communications Plan.			
Ensure adequate phone lines per staff element - contact local provider.			
Ensure adequate fax lines - contact local provider.			
Internet access necessary?			
Ensure recharging stations for cellular phones.			
VHF radio communications: <ul style="list-style-type: none"> • Establish frequencies • Assign call signs • Distribute radios • Establish communications schedule 			
Ensure recharging stations for VHF radios.			
Determine need for VHF repeaters.			
Ensure copy machine available.			
Ensure communications resource accountability.			
Ensure responders have capability to communicate with aircraft, as necessary.			

Note: Some actions on this checklist may not be applicable or may be continuous activities.

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5.3 SITE SECURITY MEASURES

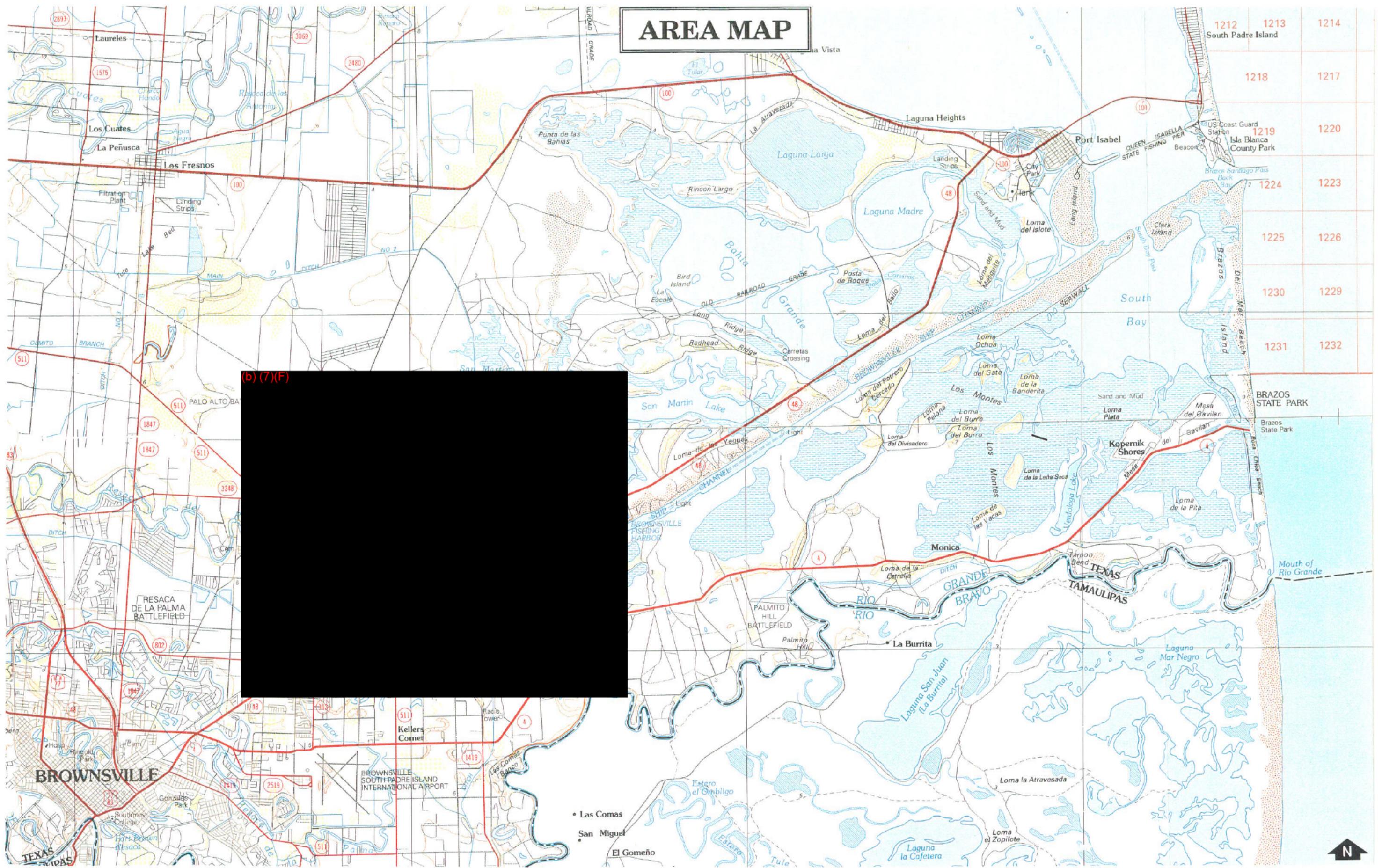
(b) (7)(F)

(b) (7)(F)

ERAP

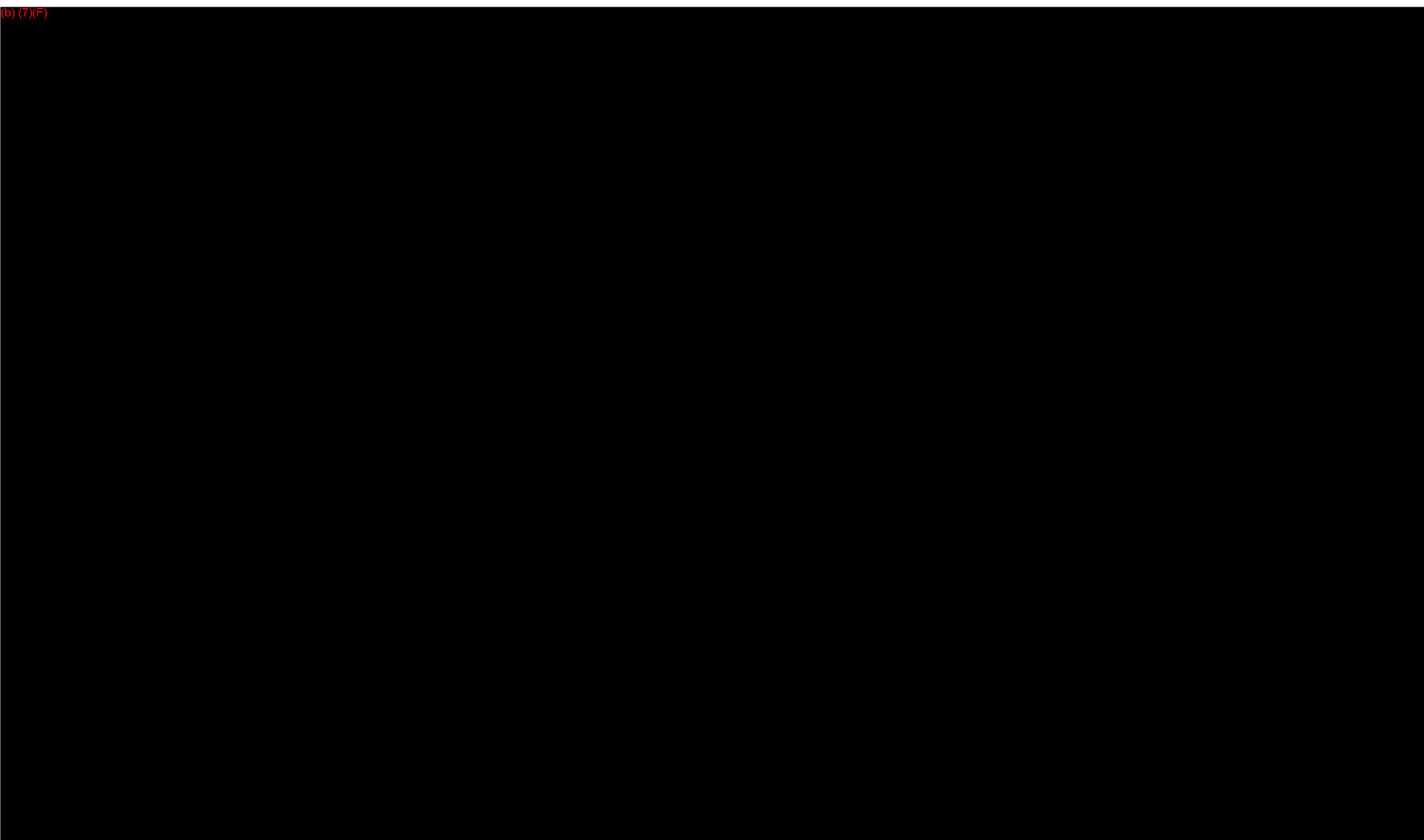
LINK FILES

AREA MAP

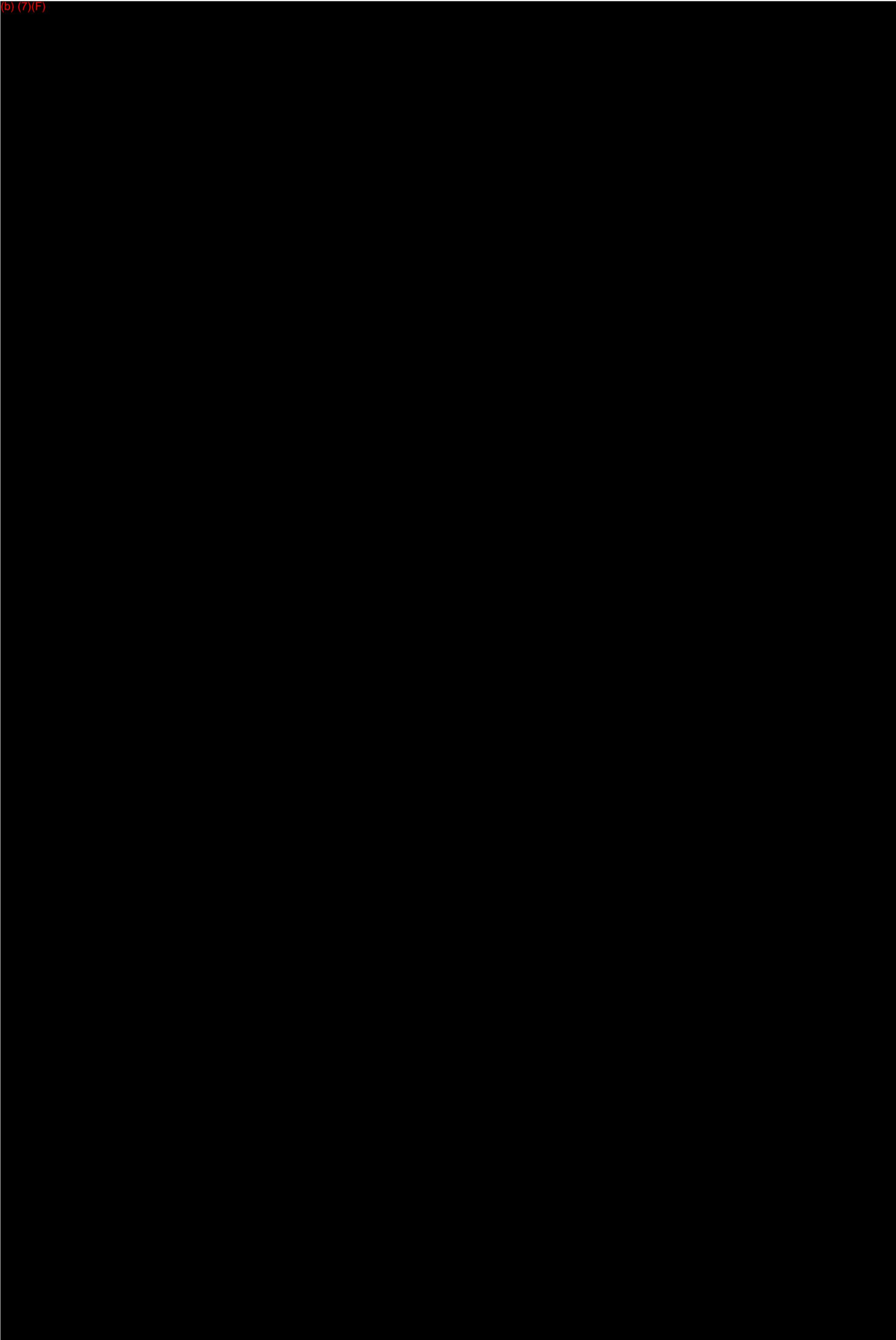


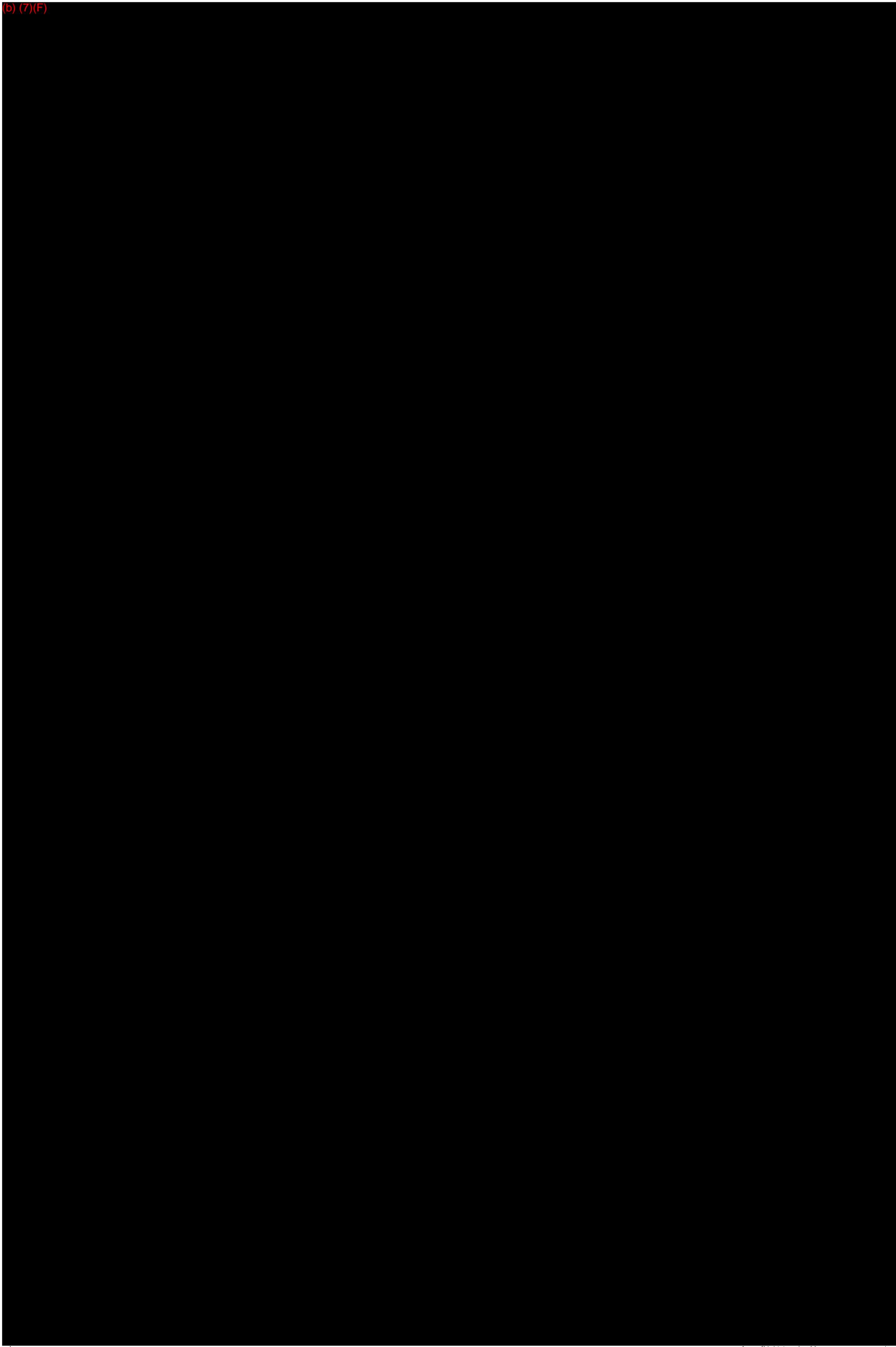
(b) (7)(F)

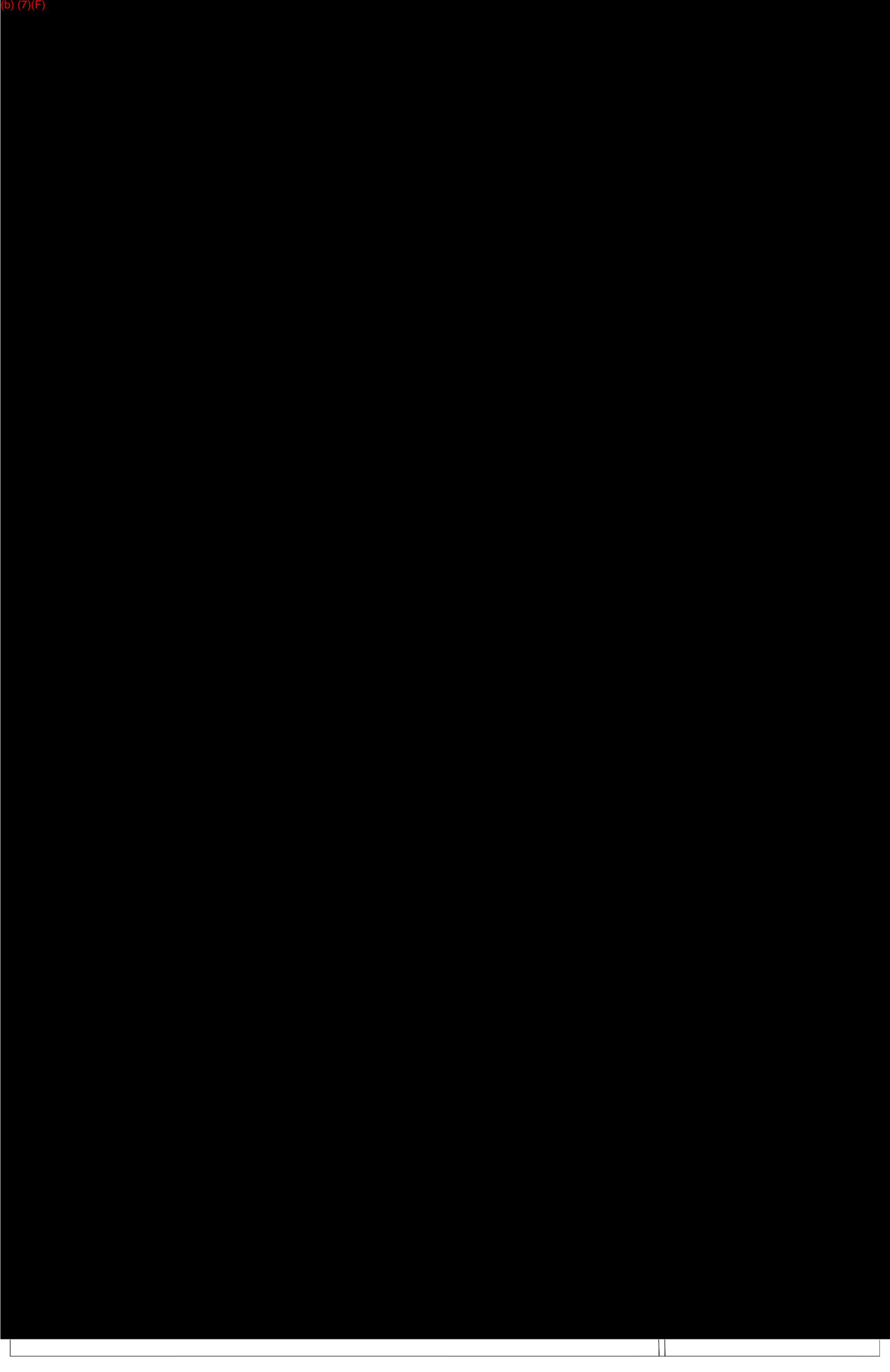
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MARINE TRANSFER OPERATIONS MANUAL

Figure 1 - COTP Examination

Figure 2 - Introduction

Figure 3 - Record of Changes

Figure 4 - Marine Transfer Regulations (33 CFR 154.310)

Figure 5 - Location Map

Figure 6 - Facility Plot Plan

Figure 7 - Emergency Contacts

Figure 8 - Declaration of Inspection

Figure 9 - Emergency Response Equipment

Figure 10 - Certificates of Adequacy

Figure 11 - Letters of Alternative Compliance and Exemptions

Figure 12 - Product Information

Figure 13 - Designated Facility Person In Charge (PIC) List

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© Technical Response Planning
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(To be Inserted)

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This document constitutes the Marine Transfer Operations Manual for this facility. It provides operational guidance for transfers of oil or hazardous chemical cargoes, to and from vessels. The format and contents of this manual are intended to meet the requirements of 33 CFR 154 and 156. Questions and comments regarding this manual should be referred to the Terminal Manager at the address and telephone number listed in this manual.

Changes in procedures or other significant information will be submitted to the Coast Guard Captain of the Port (COTP) having jurisdiction for examination. Amendments to personnel and telephone lists, and other routine supporting documents contained in the appendices will be made as they occur by substituting the revised pages in the appropriate section and sending a copy of those pages to the COTP. Examination stamps or letters indicating COTP approval of this manual follow the cover page.

Persons in charge (PIC) of oil transfers are personally responsible for having a copy of this manual in their possession whenever transfer operations are in progress. The PIC and the terminal operator conducting a transfer shall comply with published procedures and other guidance contained in this manual. Changes shall be promptly entered when received. If pages become obliterated or torn out, they shall immediately report it to the Terminal Manager and obtain the missing material.

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Changes to this Plan will be documented on this page. Plan review and modifications will be initiated and coordinated by the Environmental, Safety, and Occupational Health Department (ESOH).

CHANGE NUMBER	DATE OF CHANGE	DESCRIPTION OF CHANGE
0	1/20/2005	New Issue- Conversion of existing ICP to web-based ICP format (initial submission)

1	2/3/2005	Updated M. Helmke's address (Figure 1-3, Section 1, ERAP & ICP)
2	8/31/2005	Added USCG approval letter. Updated USCG FRP Control Number (Section 1, Fig. 1-3; ERAP & ICP)
3	1/30/2006	Annual plan review - see revisions noted below.
3	1/30/2006	Added information regarding applicable ACP's (Section 1, ERAP & ICP); added addresses for listed OSRO's (Section 7 & Appendix B)
3	1/30/2006	Specified QI authority to activate & contract with OSRO's (Section 4, ERAP & ICP)
4	7/28/2006	Specified 5-year review period (from date of last DOT/RSPA approval). Specified "change in emergency response procedures" as condition requiring revision/submission for DOT/RSPA purposes. [Section 1.2, ERAP & ICP]
4	7/28/2006	Minor corrections/additions to "Spill Detection" discussion. [Appendix D, D.1.1]
5	1/30/2007	Annual plan review - no revisions necessary at time.
6	1/30/2008	Annual plan review - no revisions necessary at time. See revisions noted below (through remainder of year).
7	3/24/2008	Misc. updates to external contacts information [Figure 3.4-1, ERAP & ICP]; Updates to tankage contents [Apps. D & E].
8	10/6/2008	Added language identifying response resources for fighting vegetable oil fires (Figure 1-3; ERAP & ICP).
9	1/30/2009	Annual plan review - no revisions necessary at time. See revisions noted below (through remainder of year).
10	9/28/2009	Added contract/equipment data for new response contractor- CRRC [Appendix B].
11	1/20/2010	Annual plan review - see revisions noted below.

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FIGURE 3 - RECORD OF CHANGES

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CHANGE NUMBER	DATE OF CHANGE	DESCRIPTION OF CHANGE
11	1/20/2010	Personnel updates (replaced Helmke w/Leubke) [Figs. 1-3, 3.4-1; ERAP & ICP]
11	1/20/2010	Updated tankage tables to reflect addition of Tk 1019 [Apps. D & E]

11	1/20/2010	Updated facility diagrams to reflect tankage additions, etc. [Figs. 1-6, 2.6-2, & Drainage]
12	8/17/2010	Personnel updates (added Lubbers); updated Storage Tank Information [Figs. 1-3 & 3.4-1, ERAP & ICP; Apps D & E, ICP]
13	11/15/2010	Five-year resubmittal to USCG [all changes since initial submittal]
14	2/3/2011	Annual plan review. Added aerial surveillance resources to external contacts information [Figure 3.4-1, ERAP & ICP]
15	7/20/2011	Numerous (minor) updates/additions/corrections, in response to USCG review-letter of 4/21/11:
15	7/20/2011	Added "simultaneous vessel transfer" info. to facility description [Fig. 1-3, ERAP & ICP]
15	7/20/2011	Modified external contacts listing to show Miller Environmental under "Other Service Providers" [Fig. 3.4-1, ERAP & ICP]
15	7/20/2011	Enhanced listing of QI responsibilities [Sect. 4, ERAP & ICP]
15	7/20/2011	Enhanced location description for facility response supplies; removed Miller Environmental from OSRO listing [Sect.5, ERAP]
15	7/20/2011	Enhanced location description for facility response supplies; removed Miller Environmental from OSRO listing [Sect. 7, ICP]
15	7/20/2011	Removed Miller Environmental from OSRO listing [App. B, ICP]
15	7/20/2011	Corrected MMPD calculation/figure [App. D, ICP]
15	7/20/2011	Corrected minor inaccuracies in Cross Refr. section [App. F, ICP]

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FIGURE 3 - RECORD OF CHANGES

Changes to this Plan will be documented on this page. Plan review and modifications will be initiated and coordinated by the Environmental, Safety, and Occupational Health Department (ESOH).

CHANGE NUMBER	DATE OF CHANGE	DESCRIPTION OF CHANGE
15	7/20/2011	Added USCG/EPA jurisdictional interface valves to facility diagrams [Figs. 1-8, ERAP & ICP]
16	7/26/2011	Personnel updates (replaced Tefertiller with Everett) [Figs. 1-3 & 3.4-1, ERAP & ICP]

17	9/16/2011	Update & recertification of SPCC Plan [App. E]
18	10/11/2011	Misc. updates to product/tankage listings [Fig. D-1, App. E]
19	11/3/2011	Added restrictive language regarding dispersant usage [Sect. 6, Fig. 6.3-2]
20	5/22/2013	Personnel changes [removed N. Everett, added A. Sanchez Jr, updated address & phone of C. Arizmendi; Figs 1-3 & 3.4-1, ICP & ERAP]
21	7/1/2013	Misc. updates to product/tankage listings [Fig. D-1, App. E]
22	1/9/2014	Personnel updates (removed A. Sanchez & J. Zamora, added M. Casas; updated title of C. Arizmendi); various updates to External Notifications [Fig. 1-3 & 3.4-1, ICP & ERAP]
23	1/16/2014	Various technical updates & revisions, requested by PHMSA via letter of 12/30/13. [Figs. 1-3 & 3.4-1, Sects. 1.2 & 6.4, App. B]

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FIGURE 4 - MARINE TRANSFER REGULATIONS (33 CFR 154.310)

Brownsville Terminal Complex

?

(1) Geographic Location of Facility			
Name of Facility:	Brownsville Terminal Complex	Type of Facility:	Onshore/Non Production
Location of Facility:	Port of Brownsville, Texas	Name & Address of Owner or Operator:	TransMontaigne Operating Co. L.P. 10150 State Highway 48 (Main Office) Brownsville , Texas 78521
Latitude/Longitude:	(b) (7)(F) (b) (7)(F)	Mile Marker :	

(2) Physical Description of Facility

- This facility is an onshore, marine transportation-related, bulk-liquids storage facility. Figure 5 depicts the facility boundaries, general layout, the path of the piping from the dock to the tank farm, the location of the first valve inside of containment for each line and safety equipment used in the marine-transfer zone.
- The primary marine transfer and control station is at the dock at the points where vessels connect to the facility marine transfer-related piping.

<ul style="list-style-type: none"> • A truck loading rack on the north side of the highway, immediately adjacent to the pipeline, enables transfers directly from vessels to tank trucks.
(3) Hours of Operation
<ul style="list-style-type: none"> • The terminal is routinely manned and operated between 0800 and 1600, Mondays through Fridays and, periodically, on weekends. These hours are subject to adjustment to meet business needs.
<ul style="list-style-type: none"> • The truck loading rack is available to drivers 24 hours per day, 7 days per week. When vessel operations are being conducted, the terminal is manned around the clock until the transfer is complete.
(4) Vessel Information
<ul style="list-style-type: none"> • Product is normally delivered to the terminal in tank barges. Vessel size varies up to a maximum of 50' by 300' per vessel. A maximum of four vessels may be moored and transferred to or from simultaneously.
(5) Product Description
<ul style="list-style-type: none"> • Products handled at this facility are listed below. An information sheet for each hazardous or regulated product handled is kept in Figure 12 . Each sheet contains the product's generic or chemical name and its appearance, odor, hazards, safe handling instructions, spill response procedures and fire fighting procedures including a listing of effective extinguishing agents.
<ul style="list-style-type: none"> • Asphalt
<ul style="list-style-type: none"> • Diesel Fuel
(6) Personnel Required and Their Duties During Transfer Operations
A. Personnel Required
<ul style="list-style-type: none"> • One terminal operator in charge of the tank farm area.
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FIGURE 4 - MARINE TRANSFER REGULATIONS (33 CFR 154.310) , CONTINUED

Brownsville Terminal Complex

33 CFR 154.310
(6) Personnel Required and Their Duties During Transfer Operations
A. Personnel Required
<ul style="list-style-type: none"> • One person in charge of the dock area, designated as a Person-in-Charge (PIC).
1. TERMINAL PIC
<ul style="list-style-type: none"> • Conduct a pre-transfer conference with the tankerman, confirming the product type, sequence and quantities to be transferred.
<ul style="list-style-type: none"> • Sample and inspect products to be transferred.

<ul style="list-style-type: none"> • Insure overall safety and security of the dockside transfer.
<ul style="list-style-type: none"> • Verify that all transfer equipment is available and serviceable.
<ul style="list-style-type: none"> • Complete the Declaration of Inspection (DOI) refer to Figure 8.
<ul style="list-style-type: none"> • Operate dock transfer equipment in accordance with the pre-transfer conference and the Transfer Procedures.
<ul style="list-style-type: none"> • Continuously monitor transfer progress.
<ul style="list-style-type: none"> • Monitor for excessive strain on the hoses.
<ul style="list-style-type: none"> • Monitor the condition of the vessel mooring lines for proper tension.

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FIGURE 4 - MARINE TRANSFER REGULATIONS (33 CFR 154.310) , CONTINUED

Brownsville Terminal Complex

33 CFR 154.310
(6) Personnel Required and Their Duties During Transfer Operations
1. TERMINAL PIC
<ul style="list-style-type: none"> • Maintain continuous communications with the terminal operator.
<ul style="list-style-type: none"> • Insure the ability to continuously communicate with the vessel PIC in a language understood by both PIC's. If this condition can not be met, the terminal PIC will not begin a transfer or will shutdown a transfer if it is in progress.
<ul style="list-style-type: none"> • Monitor the location of the tankermen to insure that they are at their stations and in the proper number for the activity being conducted.
<ul style="list-style-type: none"> • Shut down a transfer any time a spill or other emergency condition is detected or any time that the safety of the transfer is in doubt.
<ul style="list-style-type: none"> • Make required entries on transfer papers and file terminal copies of all transfer papers and the DOI upon completion of the delivery.
2. TERMINAL OPERATOR
<ul style="list-style-type: none"> • Be fully informed about the order and rate of transfer as discussed during the pre-transfer conference.
<ul style="list-style-type: none"> • Verify that receipt tank(s) has the capacity to store the quantities planned during the pre-transfer conference.
<ul style="list-style-type: none"> • Maintain continuous communications with the terminal PIC.

- | |
|---|
| <ul style="list-style-type: none"> • Operate tank-farm equipment in accordance with the pre-transfer conference and the Transfer Procedures. |
| <ul style="list-style-type: none"> • Observe the pipeline and tank farm periodically for evidence of leaks during the transfer. |

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FIGURE 4 - MARINE TRANSFER REGULATIONS (33 CFR 154.310) , CONTINUED

Brownsville Terminal Complex

33 CFR 154.310

(6) Personnel Required and Their Duties During Transfer Operations

2. TERMINAL OPERATOR

- Record hourly gauges on the active tank(s).
- Calculate product transfer rates and report results to the terminal PIC.
- Notify terminal PIC when approaching a planned fill level, a tank safe-fill level or a minimum tank fill level.
- Close the tanks and any intermediate valves if an emergency situation develops.

(7) Emergency Contacts and Telephone Numbers

- The telephone number for the facility is (859) 331-0900. The terminal operator who answers this number has a complete list of terminal, corporate and governmental response-agency phone numbers to be used in relaying required emergency reports.
- In the event an operator is not immediately available by phone, Figure 6 contains a list of phone numbers that may be used for emergency reporting and includes the names and numbers of the primary Qualified Individual (QI) and alternate QI's.

(8) Duty Watchman

- Operators of any unmanned barges moored at the terminal dock, which contain more oil than normal clingage and unpumpable sump residues in any cargo tank, shall provide their own watchman.
- The watchman, who is responsible for the security of the vessel or vessels, will maintain surveillance of it and keep unauthorized persons off. Under normal circumstances, facility personnel will not serve as the watchman.

(9) Transfer Communication System

- Intrinsically safe two-way radios suitable for use in all weather conditions are, at a minimum, distributed to the terminal PIC and the terminal operator. The vessel PIC may also be issued a radio in the event continuous communications cannot be maintained verbally or through visual signals. Portable air horns may be used to signal an

emergency in the event of radio failure.

(10) Personnel Shelters

- A personnel shelter is available at the dock, as depicted on the facility diagram. The enclosure provides protection from the weather and storage for materials used in dock operations.

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FIGURE 4 - MARINE TRANSFER REGULATIONS (33 CFR 154.310) , CONTINUED

Brownsville Terminal Complex

33 CFR 154.310

(11) Drip And Discharge Collection

- All transfer connections in the marine transfer areas are located above drip pans. Product leaks in this area would be captured in the containment system and later removed.
- Certificates of Adequacy to receive oily wastes and garbage are not required at this facility.

A. Description and Instructions

- Not applicable

B. Vessel Slop Reception Facilities

- Not applicable

(12) Description and Location of Each Emergency Shutdown System

- The emergency shutdown system at this facility consists of continuously available radio and voice/visual communications among the vessel PIC, the terminal PIC and the terminal operator. Any participant in the transfer becoming aware of an emergency condition shall call for an immediate shutdown, followed by each participant ensuring that the pumps are off and closing all valves under their control.
- In order to insure that an emergency shutdown can be made immediately, the terminal PIC and the terminal operator will keep their radios with them at all times and the PIC shall remain within a distance of the appropriate dock valve that allows him to get back to it within 30 seconds of receiving an emergency shutdown notification.

(13) Monitoring Devices

- Not applicable; this facility is not required to have monitoring devices.

(14) Spill Containment

- The facility's integrated Contingency Plan (ICP) would be activated in the event of a spill that occurred during transfer operations. Specific guidance is as follows:

A. Quantity and Type of Equipment

- Spill response equipment and supplies are available from terminal owned stocks, the contract OSRO's and stocks of company-owned materials at other terminals. A listing of the type and amount of terminal equipment and supplies is kept in Appendix F.

B. Equipment Location

- Company-owned equipment is stored at the terminal. A stock of sorbent materials for immediate use is kept in the dock area. Other items are stored throughout the facility.

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Corporation 2004**FIGURE 4 - MARINE TRANSFER REGULATIONS (33 CFR 154.310) , CONTINUED****Brownsville Terminal Complex**

33 CFR 154.310
(14) Spill Containment
C. Instructions for Use
<ul style="list-style-type: none"> • In the event of a spill, operators shall take steps to shutdown the transfer pumps and close valves in order to isolate the leak. The next step is to implement the emergency response plan by notifying the terminal manager, either directly or through a relay by another terminal employee. Small spills may be responded to by activating a local OSRO or by using terminal materials and personnel to contain and clean up the discharge, at the discretion of the Incident Commander. Larger spills will be handled by activating sufficient OSRO's and bringing in additional corporate personnel and equipment as needed.
D. Equipment Access Time
<ul style="list-style-type: none"> • Terminal equipment and supplies identified above are directly controlled by the terminal staff and are immediately available. The response can be initiated within one hour.
(15) Fire Extinguishing Equipment
A. Quantity Type and Location
<ul style="list-style-type: none"> • Fixed fire fighting equipment and portable fire extinguishers are located throughout the terminal. Their location is plotted on the facility diagram (Figure 5). At least one 20-pound, dry chemical extinguisher will be located within 50 feet of the transfer station.
B. Instructions for Use
<ul style="list-style-type: none"> • Structural fires and product fires will be fought by the fire department. • Portable fire extinguishers may be used by trained employees on small fires where their safety is not jeopardized. Selection of fire extinguishers for each station is based on the primary hazard in that area and the extinguisher's fire-fighting capability will be indicated on a label on the extinguisher.
(16) Maximum Allowable Working Pressure (MAWP)
A. Maximum Allowable Working pressure

<ul style="list-style-type: none"> The maximum allowable working pressure for the transfer system is 150 psi.
B. Maximum Relief Valve Settings
<ul style="list-style-type: none"> There are no transfer pumps in the terminal marine transfer piping system. Tank vessel discharge pressures are monitored and normally do not exceed 100 psi at the dock.
C. Thermal Relief Valves
<ul style="list-style-type: none"> Thermal relief valves are installed at each operable in-line valve from the dock to the storage tanks to protect against over-pressurizing a liquid-filled line due to heating by the sun when the valves are closed. These relief valves have small diameter orifices and open at low pressures when a differential pressure builds across the closed valve. They have no effect on system pressure during a transfer because the valves that they are installed on are open in that situation and there is no differential pressure.
D. Pressure Tests
<ul style="list-style-type: none"> Transfer piping and hose test records are on file in the terminal office. A COTP Letter of Alternative Compliance authorizing pneumatic testing is located in Figure 11.
(17) Transfer Procedures
A. Loading Arm
<ul style="list-style-type: none"> Not applicable; this facility does not have loading arms.

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FIGURE 4 - MARINE TRANSFER REGULATIONS (33 CFR 154.310) , CONTINUED

Brownsville Terminal Complex

33 CFR 154.310
(17) Transfer Procedures
B. Transferring Oil
<ul style="list-style-type: none"> A transfer begins when the respective PIC's first meet to begin completing the DOI and is complete when all connections for the transfer have been uncoupled and secured with blanks or other closure devices and the PIC's have completed the DOI, including entering the date and time of completion. The following steps describe a receipt from a vessel.
<ul style="list-style-type: none"> 1. Line up terminal equipment for the transfer, ensuring that the dock and active-tank valves remain closed. At the transfer point verify that: <ul style="list-style-type: none"> Drip pans are empty and drain plugs are in place Required fire extinguishers are in place and serviceable A current copy of the facility Marine Transfer Operations Manual is present
<ul style="list-style-type: none"> 2. Obtain, review and process transfer documentation, as necessary.
<ul style="list-style-type: none"> 3. Ensure delivering cargo tanks are sampled and gauged, as necessary.

4. Conduct preliminary laboratory analysis of cargo, as necessary.
<ul style="list-style-type: none"> • 5. Check vessel moorings ensuring that: <ul style="list-style-type: none"> ◦ The vessel manifold lines up with the dock connection ◦ Mooring lines appear to be holding the vessel securely ◦ Provisions have been made for draft changes, surges, currents, and rough water.
<ul style="list-style-type: none"> • 6. Connect transfer equipment to the vessel.
<ul style="list-style-type: none"> • 7. Conduct a pre-transfer conference and execute the DOI. Include the terminal operator in the conference or separately brief that person on all aspects of the transfer. Keep one copy of the DOI on the dock and another copy on the vessel.
<ul style="list-style-type: none"> • 8. Issue radios and conduct a communications check with the vessel PIC and terminal operator. Confirm that all parties are ready to commence the transfer.
<ul style="list-style-type: none"> • 9. Open the active shore tank valve, any intermediate valves not yet open and the dock valve while observing dock connections for signs of a leak or escaping air. Close the valves immediately if a leak is detected.

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FIGURE 4 - MARINE TRANSFER REGULATIONS (33 CFR 154.310) , CONTINUED

Brownsville Terminal Complex

33 CFR 154.310
(17) Transfer Procedures
B. Transferring Oil
<ul style="list-style-type: none"> • 10. Begin pumping at a reduced rate. Check the connections for any evidence of a leak.
<ul style="list-style-type: none"> • 11. Increase the pumping rate to the agreed upon transfer rate, but in no case higher than the established MAWP.
<ul style="list-style-type: none"> • 12. The terminal operator shall confirm that active tank levels are changing as planned once the transfer is underway.
<ul style="list-style-type: none"> • 13. The facility PIC shall make regular checks of the dock and the immediately surrounding area for leaks. Monitor transfer system pressure for compliance with the MAWP.
<ul style="list-style-type: none"> • 14. The terminal operator shall periodically patrol the active tanks and transfer piping looking for leaks or other signs of a malfunction and shall take gauges to verify that the fill levels and transfer rates are consistent with the original transfer plan. Communicate progress reports and updates of the estimated completion time to the other transfer participants.
<ul style="list-style-type: none"> • 15. For simultaneous transfers from multiple barges where one PIC is serving in this

capacity for two barges, ensure that the provisions in the COTP letter of alternative compliance are reviewed during the pre-transfer conference and that the conditions are met. This letter is contained in Appendix G. [Delete if NA and renumber remaining paragraphs.]

- 16. If a temporary shutdown of transfer operations is planned, all PIC's shall review and comply with the specific procedures and conditions contained in the COTP letter of alternative compliance, located in appendix G.

- 17. During direct transfers to tank trucks, the transfer will be temporarily interrupted as each truck is filled. Repeat the filling process for successive trucks.

C. Completion of Pumping

- 1. Stop the transfer pump.
- 2. Close the dock valve.

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FIGURE 4 - MARINE TRANSFER REGULATIONS (33 CFR 154.310) , CONTINUED

Brownsville Terminal Complex

33 CFR 154.310
(17) Transfer Procedures
C. Completion of Pumping
<ul style="list-style-type: none"> • 3. Drain the hose.
<ul style="list-style-type: none"> • 4. Disconnect transfer equipment from the vessel, blank open ends and retrieve.
<ul style="list-style-type: none"> • 5. Closeout the DOI by noting the time of completion and route the terminal copy to the facility office for filing.
<ul style="list-style-type: none"> • 6. Close the remaining valves in the transfer lines, as needed.
<ul style="list-style-type: none"> • 7. Gauge tanks, take samples and process transfer documentation, as necessary.
D. Emergencies
<ul style="list-style-type: none"> • In the event that an emergency condition arises from any cause, the principal consideration will be to insure the safety of personnel affected by the emergency, followed by protection of the environment.
<ul style="list-style-type: none"> • The initial response for all foreseeable emergency conditions is to stop the transfer
<ul style="list-style-type: none"> • Close as many valves as time allows and conditions require
<ul style="list-style-type: none"> • An operator in the vicinity of the problem may then attempt to react to the emergency using equipment on-hand if the response can be made without endangering personal

safety and has the potential to reduce the impact of the emergency condition

- All persons involved should recognize that it is generally more important to notify operations and request additional help than to handle the response alone

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FIGURE 4 - MARINE TRANSFER REGULATIONS (33 CFR 154.310) , CONTINUED

Brownsville Terminal Complex

33 CFR 154.310	
(17) Transfer Procedures	
D. Emergencies	
<ul style="list-style-type: none"> • All emergency conditions shall be reported to the terminal manager as quickly as possible 	
1. FIRE	
<ul style="list-style-type: none"> • The portable fire extinguishers are only to be used on small fires, and then only if the fire is not in immediate danger of spreading to a storage tank or pipeline containing product. If there is a fire on the vessel or ashore near any part of the transfer system, secure the transfer and close down the system as time and conditions allow. 	
2. SEVERE WEATHER	
<ul style="list-style-type: none"> • Very high winds can cause vessel mooring lines to break or pay out which may be enough to put a strain on the transfer piping or hoses, potentially stretching them to the breaking point. At the onset of severe weather such as a severe thunderstorm or tornado/waterspout, secure the transfer and seek safe shelter as appropriate to the situation. 	
3. OIL SPILL	
<ul style="list-style-type: none"> • In the event of an oil spill related to terminal activity, the terminal Integrated Contingency Plan would be activated. Operators shall secure the transfer and respond in accordance with the steps detailed in Section (18) of this manual. 	
4. PERSONNEL INJURY	
<ul style="list-style-type: none"> • Response to injuries will be based on severity. A first aid kit is available to treat minor wounds. Persons with injuries that require treatment at a medical facility will be transported to the company designated clinic if they can move on their own without aggravating their condition. 	
<ul style="list-style-type: none"> • Community-based emergency medical technicians will be summoned by calling 911 for those situations involving more serious injuries or injuries that would be aggravated by moving without medical supervision. 	
<ul style="list-style-type: none"> • The 911 phone call can be made from the scene of the accident if phones are readily available, or by contacting the terminal office. Regardless of severity, the terminal manager shall be immediately notified of all injuries, including injuries to non- 	

employees.

(18) Reporting and Initial Containment

- In the event of an oil spill in the vicinity of the transfer, the terminal PIC will make an initial assessment of the situation while staying in the marine transfer area. If the discharge, or threat of a discharge into the waters, comes from terminal equipment or the vessel, the transfer will be stopped. The transfer should also be suspended if a nearby discharge from some other source in any way threatens the safety of the transfer. The PIC may then attempt to contain the spill, as discussed below, and will notify the terminal as soon as possible. Responses to spills that the terminal is responsible for will be organized using the terminal's ICP.

A. Reporting Procedures

- Contact the terminal manager or senior official at the terminal using any available method to report the situation. If direct radio contact is not possible, use a phone or send a messenger to notify the office.
- The Terminal Manager or a person designated by him is responsible for making required notifications to the company's senior management and the Environmental, Safety and Occupational Health (ESOH) department in accordance with the internal notification procedure. ESOH will normally make required notifications to federal, state and local government agencies.

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FIGURE 4 - MARINE TRANSFER REGULATIONS (33 CFR 154.310) , CONTINUED

Brownsville Terminal Complex

33 CFR 154.310

(18) Reporting and Initial Containment

B. Initial Containment

- Use response materials immediately available to minimize the affect of any spill. Once those materials have been used to best advantage and the initial emergency report has been made, attempt to deploy any other response equipment that may be available. Additional response materials will be brought to the scene as needed.

(19) Applicable Laws and Regulations

- Transfers of petroleum products and hazardous substances from and to vessels are governed by a variety of federal, state and local laws and regulations. The broadest of these is the Federal Water Pollution Control Act, as amended by the Oil Pollution Act of 1990 (OPA 90). This law prohibits discharges of harmful quantities of oil or hazardous substances into the navigable waters of the United States. All company marine terminals are situated in close proximity to navigable waters of the United States. Coast Guard regulations, which implement the law, are contained in Title 33 CFR, Parts 154 through 156. State and local laws and regulations prohibit the same types of discharges in their respective jurisdictions. In summary, terminal operators must be aware that:

• A. Discharges of oil and hazardous substances into the water are prohibited;
• B. Discharges that do occur must be reported to the National Response Center within one hour;
• C. Parties that cause oil to be spilled in the water are responsible for cleaning it up;
• D. Petroleum or hazardous substance spills on land surfaces may be reportable, even if the spilled product doesn't enter or threaten to enter the water. As a matter of company policy, notify the terminal manager in all cases of a spill;
• E. Violations of the various laws and regulations may be prosecuted civilly or criminally and punishments may include imprisonment and/or substantial fines;
• F. Citations for violations may be issued to the individual involved, as well as the company.
(20) Portable Lighting
• Not applicable; fixed lighting provides satisfactory illumination during night transfer operations.
(21) Training and Qualification Program for Persons in Charge
• Designation as a PIC is obtained by completing the following program:

FIGURE 4 - MARINE TRANSFER REGULATIONS (33 CFR 154.310) , CONTINUED

Brownsville Terminal Complex

33 CFR 154.310
(21) Training and Qualification Program for Persons in Charge
A. Work and Study
• Work and study under the supervision of qualified persons in charge for 48 hours at this or a similar terminal. If the trainee fulfilled the 48-hour experience requirement at another terminal, they must still work under supervision at this terminal until they have reliably demonstrated the ability to operate this terminal's transfer and control systems and correctly react to emergency conditions.
B. Training
• Complete training that meets the following skill and knowledge objectives:
• 1. Knowledge of the hazards of each product handled and the types of personal protective equipment available to protect against them;
• 2. Knowledge of pertinent parts of the following rules, regulations and requirements: <ul style="list-style-type: none"> ◦ Federal Water Pollution Control Act, as amended by OPA 90 ◦ Title 33 CFR, Parts 154 through 156

<ul style="list-style-type: none"> ◦ Coast Guard COTP rulings applicable to this terminal ◦ The facility Marine Transfer Operations Manual ◦ The facility Integrated Contingency Plan
<ul style="list-style-type: none"> • 3. Ability to operate terminal transfer equipment in accordance with the procedures detailed in Section 17 of this manual;
<ul style="list-style-type: none"> • 4. Knowledge of vessel transfer systems, in general;
<ul style="list-style-type: none"> • 5. Knowledge of vessel transfer control systems, in general;
<ul style="list-style-type: none"> • 6. Knowledge of terminal storage tanks, piping and transfer control systems;
<ul style="list-style-type: none"> • 7. Knowledge of the requirements for and the ability to follow local discharge reporting procedures;
<ul style="list-style-type: none"> • 8. Ability to carry out the PIC duties.

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FIGURE 4 - MARINE TRANSFER REGULATIONS (33 CFR 154.310) , CONTINUED

Brownsville Terminal Complex

33 CFR 154.310
(21) Training and Qualification Program for Persons in Charge
B. Training
<ul style="list-style-type: none"> • 9. Knowledge of fire reporting procedures and equipment locations, and the ability to use a portable fire extinguisher.
C. Certified Terminal Persons In Charge
<ul style="list-style-type: none"> • Each PIC must be designated by the facility manager and have their name added to the list of certified terminal PIC's, which is contained in Figure 6. The facility manager will review the training records of contract PIC's and ensure that they receive the facility-specific training.
(22) Hose Markings
<ul style="list-style-type: none"> • Transfer hoses are marked either "OIL SERVICE ONLY" or will display the name of the product that they are used for. Hose records are on file in the terminal office.
(23) Tank Cleaning and Stripping Operations
<ul style="list-style-type: none"> • Not applicable; tank cleaning and stripping operations are not performed at this facility.
B. Vapor Collection Systems
<ul style="list-style-type: none"> • Not applicable
1. Description of Vapor Collection System

• Not applicable
2. Design Description of Vapor Collection System
• Not applicable
i. Vapor Line Connection
• Not applicable
ii. Startup and Shutdown Procedures
• Not applicable
A. Startup Procedures
• Not applicable

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FIGURE 4 - MARINE TRANSFER REGULATIONS (33 CFR 154.310) , CONTINUED

Brownsville Terminal Complex

33 CFR 154.310
(23) Tank Cleaning and Stripping Operations
B. Shutdown Procedures
• Not applicable
iii. Steady State Procedures
• Not applicable
iv. Provisions for Dealing with Pyrophoric Sulfide
• Not applicable
v. Alarms and Shutdown Devices
• Not applicable
vi. Pre-transfer Equipment Inspector Requirements
• Not applicable

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FIGURE 5 - LOCATION MAP

[Click here to view Brownsville Terminal Complex Location Map](#)

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FIGURE 6 - FACILITY PLOT PLAN

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FIGURE 7 - NOTIFICATIONS AND TELEPHONE NUMBERS, CONTINUED

*24 Hour Number

AFFILIATION	PHONE NUMBER	TIME CONTACTED
Initial		
National Response Center (Washington DC)	(800) 424-8802* (202) 267-2675* (202) 267-2180	
Cameron County (LEPC)	(956) 547-7000 (956) 547-7006	
Texas General Land Office [GLO] / Commission on Environmental Quality [TCEQ] (Austin TX)	(800) 832-8224*	
Texas General Land Office-	(800) 832-8224*	

GLO (Corpus Christi TX)	(361) 549-5310* (956) 504-1417	
Recommended		
Federal Agency(s)		
OSHA [reportable injury or death] (Washington DC)	(800) 321-6742*	
U.S. Fish and Wildlife Service (Houston TX)	(281) 286-8282	
US EPA Regional Office-Region 6 (Dallas TX)	(866) 372-7745* (214) 665-2200	
USCG Captain of the Port (Brownsville MSO) 2993 N. Indiana Ave., Ste. A, Brownsville, TX 78521	(956) 832-0517* (956) 832-0743 (fax)	
USCG Captain of the Port (Corpus Christi MSO) 555 N. Carancahua, Ste. 500, Corpus Christi, TX 78478	(361) 888-3162 (800) 434-9486 (361) 888-3231 (fax)	
State Agency(s) - Texas		
Texas Parks & Wildlife Department (Austin TX)	(512) 389-4726 (512) 389-4848*	
Texas Railroad Commission	(512) 463-6788* (Austin TX) (713) 869-5001 (361) 242-3113	

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FIGURE 8 - DECLARATION OF INSPECTION



Declaration of Inspection
Before Transfer of Liquid Cargo in Bulk
(Incorporates requirements of 33 CFR 156.120 & 150; 46
CFR 35.35-30)

Transferring Vessel/Facility Name:		Receiving Vessel/Facility Name:	
Transfer Location (Port-Berth/Facility/Coordinates):		Date/Time Transfer Started:	Date/Time Transfer Completed:
Vessel	PIC's shall verify by inspection and indicate by initialing that their vessel or facility meets the following requirements:		TranMontaigne Facility/Vessel

A.	The mooring lines are strong enough and long enough for all expected conditions						
B.	Transfer hoses and/or loading arms long enough for intended use without strain from vessel movement						
C.	Transfer hoses are supported to prevent damage to the hoses and undue strain on the couplings						
D.	The transfer system is properly lined up for discharging or receiving oil or hazardous material						
E.	Each part of the transfer system not being used during the transfer operation is securely blanked or shut off						
F.	Each hose and loading arm end connected for the transfer operation is blanked off using acceptable closure devices						
G.	The transfer system is attached to a fixed connection on the vessel and the facility						
H.	Each transfer hose is free from bulges and soft spots, or gouges and cuts that penetrate the 1 st layer of reinforcement						
I.	Each transfer hose and loading arm meets the design and marking requirements						
J.	Each connection is of an approved design and meets the gasket, and bolting requirements						
K.	Required overfill protection devices or other monitoring devices are installed and operating properly						
L.	Required discharge containment equipment is readily accessible or deployed						
M.	Required discharge containments have been provided for couplings and are drained as necessary						
N.	All scuppers or other drains are closed or plugged						
O.	All connections in the transfer system are leak free except for permissible drippage						
P.	A communications system is provided between the facility and the vessel and is operable						
Q.	An emergency shutdown system is available and operable						
R.	Required PIC's are on duty at the transferring and receiving control stations						
S.	Each PIC is on site, has an Operations/Transfer Manual available and conducts transfers in accordance with it						
T.	Other personnel as required by Operations/Transfer Manuals are available and perform prescribed duties						
U.	At least one person is present who fluently speaks the language(s) of both PIC's						
V.	Persons in charge have held a conference to ensure the mutual understanding of the following transfer operations 1. The identity of the product(s) to be transferred - enter below: Sequence of <table border="1" style="display: inline-table; vertical-align: middle;"> <tr> <td>Product</td> <td>1)</td> <td>2)</td> <td>3)</td> <td>4)</td> </tr> </table>	Product	1)	2)	3)	4)	
Product	1)	2)	3)	4)			

<ol style="list-style-type: none"> 2. transfer 3. of flow 4. Name or title and location of each person participating in the transfer operation 5. Details of the transferring and receiving systems including procedures to ensure that MAWP's aren't exceeded 6. Critical stages of the transfer operation such as startup, tank switches and topping off 7. Federal, state and local rules that apply to the transfer of oil or hazardous materials 8. Emergency procedures 9. Discharge containment and reporting procedures 10. Watch or shift arrangements 11. Transfer shutdown procedures 12. An agreed-upon frequency if radios are used 	<table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 15%; text-align: center;">BPH</td> <td style="width: 15%;"></td> </tr> </table>	BPH					
BPH							

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FIGURE 8 - DECLARATION OF INSPECTION, CONTINUED



TRANSMONTAIGNE
PRODUCT SERVICES INC.
 and Affiliated Companies

Declaration of Inspection, Continued
 Before Transfer of Liquid Cargo in Bulk
 (Incorporates requirements of 33 CFR 156.120 & 150; 46
 CFR 35.35-30)

Vessel	PIC's shall verify by inspection and indicate by initialing that their vessel or facility meets the following requirements:	TranMontaigne Facility/Vessel
	W. Between sunset and sunrise adequate lighting of the transfer connection points and work areas is provided	
	X. If smoking is to be permitted in the marine transfer area, it will only be allowed in designated locations	
	Y. A <i>Vapor Recovery Appendix</i> is attached if the transfer includes collection ashore of vessel cargo tank vapors	
The following requirements shall be verified by inspection and initialed by vessel PIC's only		
	1. Required warning signs and red warning signals are displayed	
	2. No welding or hot work, and no unauthorized repair work in cargo spaces, is being conducted	
	3. No fires or open flames are present on the deck or in compartments on the deck on which cargo connections are made	
	4. Boiler and gallery fires are safe to light during transfers of Grade A, B, or C cargoes or have been extinguished	
	5. A determined has been made regarding amoking off of weather decks during transfers of Grade A, B, or C cargoes	
	6. The overboard or sea suction valves are sealed or lashed in the	

	closed position	
	7. If cargo-tank inerting is required, the system is maintaining an inert atmosphere in the cargo tanks	
	8. Applicable sections of the vessel response plan have been reviewed and initial response resources are available	

I, the undersigned person in charge of the transfer of liquid cargo in bulk about to begin or continue, do certify that I have personally inspected this vessel or facility, as appropriate, with reference to the above listed requirements, and that opposite each of the applicable items listed I have indicated by initialing that the facility complies with all pertinent regulations and that I agree to begin/continue the transfer operation.

Vessel Person in Charge			Facility/Vessel Person in Charge		
Signature	Date	Time	Signature	Date	Time

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FIGURE 8 - DECLARATION OF INSPECTION, CONTINUED

Vapor Recovery Appendix to the
 Declaration of Inspection
 Before Transfer of Liquid Cargo in Bulk
 (Incorporates requirements of 33 CFR 156.120 & 150; 46
 CFR 35.35-30)



Transferring Vessel/Facility Name:		Receiving Vessel/Facility Name:	
Transfer Location (Port-Berth/Facility/Coordinates):		Date/Time Transfer Started:	
Vessel	Transfer operations that include the collection of vapors emitted from a vessel's cargo tanks through a venting system not located on the vessel shall meet the following requirements which PIC's shall verify by inspection and indicate by initialing:	TranMontaigne Facility/Vessel	
	1. Each valve in the vapor collection system is correctly positioned to allow the collection of collection of cargo vapor		
	2. The vapor collection hose or arm is connected to the vessel's vapor connection		
	3. An electrical insulating flange or one length of non-conducting hose is fitted between the facility vapor connection and the vessel vapor connection		
	4. The initial transfer rate and the minimum transfer rate are determined and posted as follows:		

	Initial Transfer Rate		Maximum Transfer Rate	
5.	The maximum and minimum operating pressures at the facility vapor connection are determined			
6.	The tank barge overfill control system, if installed, is connected to the facility, tested, and operating properly			
7.	The following have been performed not more than 24 hours prior to the <ul style="list-style-type: none"> i. Each required alarm and automatic shutdown system has been tested and found to be operating properly ii. Required analyzers have been checked for calibration by use of a span gas 			
8.	Each vapor recovery hose has no unrepaired loose covers, kinks, bulges, soft spots, or any other defect which would permit the discharge of vapor through the hose material, and no external gouges, cuts, or slashes that penetrate the first layer of hose reinforcement			
9.	The oxygen content of the vessel's cargo tanks, if inerted, is at or below 8 percent by volume			

I, the undersigned person in charge of the transfer of liquid cargo in bulk about to begin or continue, do certify that I have personally inspected this vessel or facility, as appropriate, with reference to the above listed vapor recovery system requirements, and that opposite each of the applicable items listed I have indicated by initialing that the facility complies with all pertinent regulations.

Vessel Person in Charge			Facility/Vessel Person in Charge		
Signature	Date	Time	Signature	Date	Time

Brownsville Terminal Complex		
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FIGURE 9 - EMERGENCY RESPONSE EQUIPMENT

[Click here to view Brownsville Terminal Complex emergency response equipment](#)

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FIGURE 10 - CERTIFICATES OF ADEQUACY

[Click here to view Brownsville Terminal Complex certificates of adequacy](#)

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FIGURE 11 - LETTERS OF ALTERNATIVE COMPLIANCE AND EXEMPTIONS

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FIGURE 12 - PRODUCT INFORMATION

(To be Inserted)

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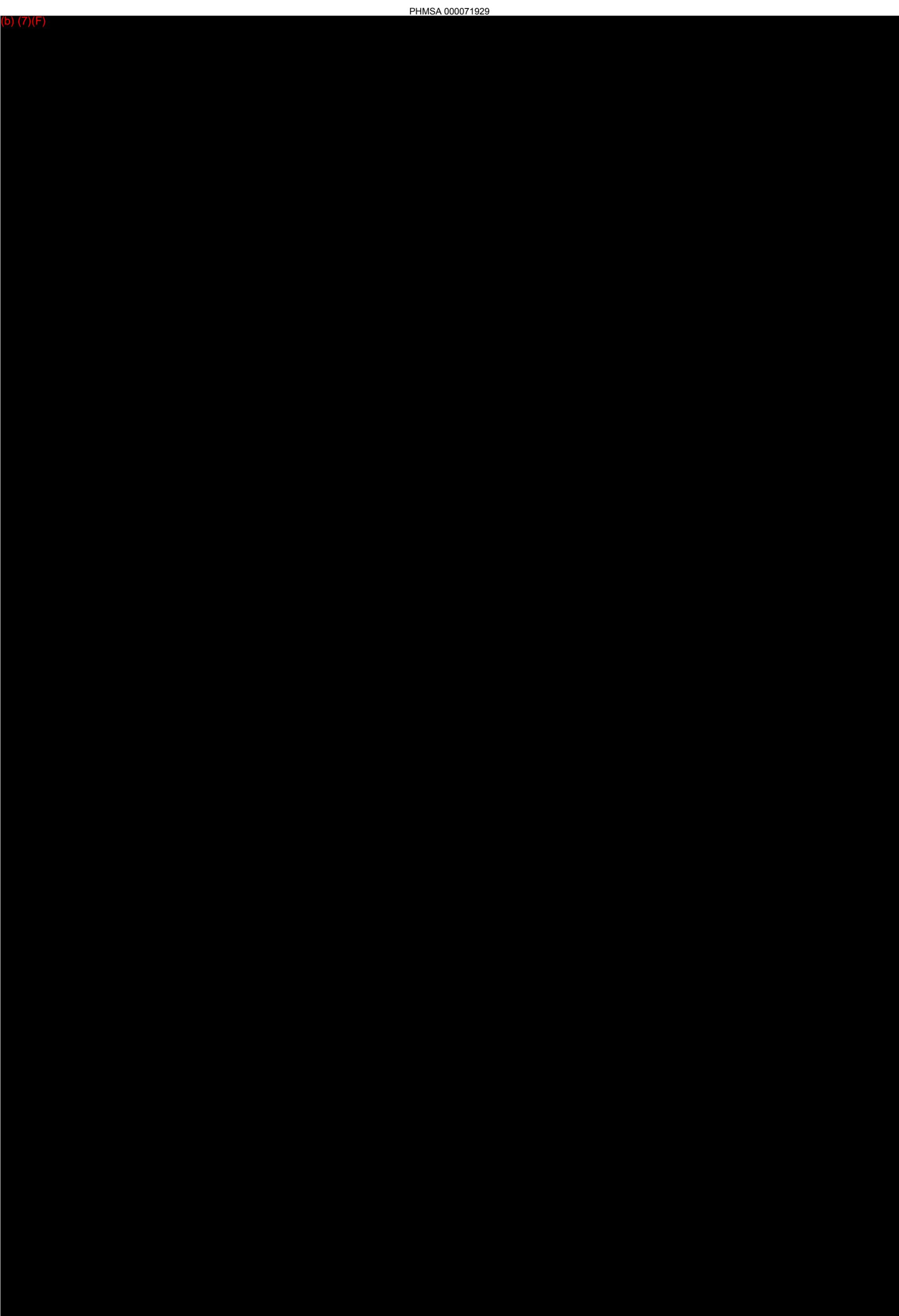
© Technical Response Planning
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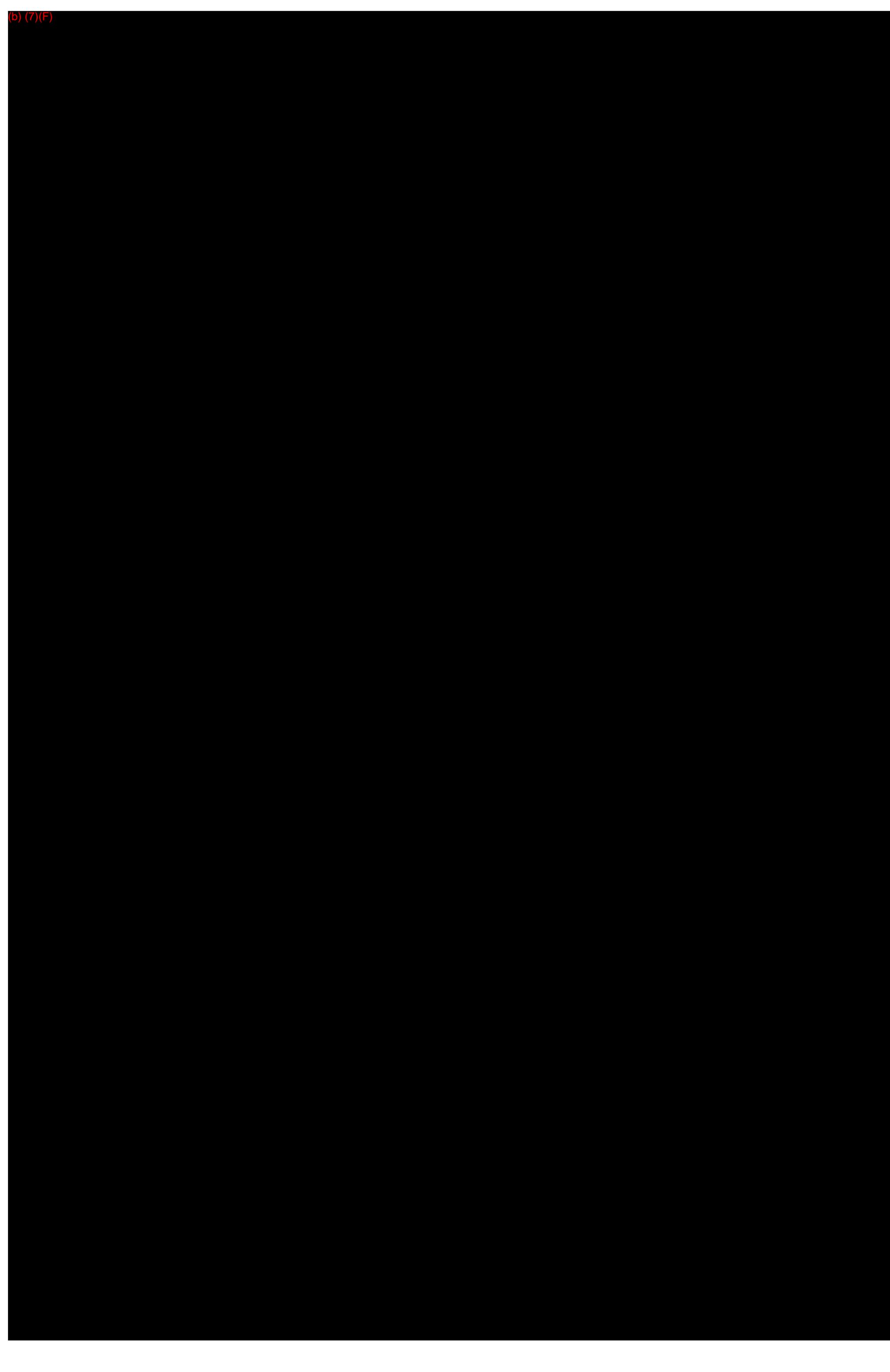
Figure 13 -Designated Facility Person In Charge (PIC) List

Click here to view Brownsville Terminal Complex PIC list

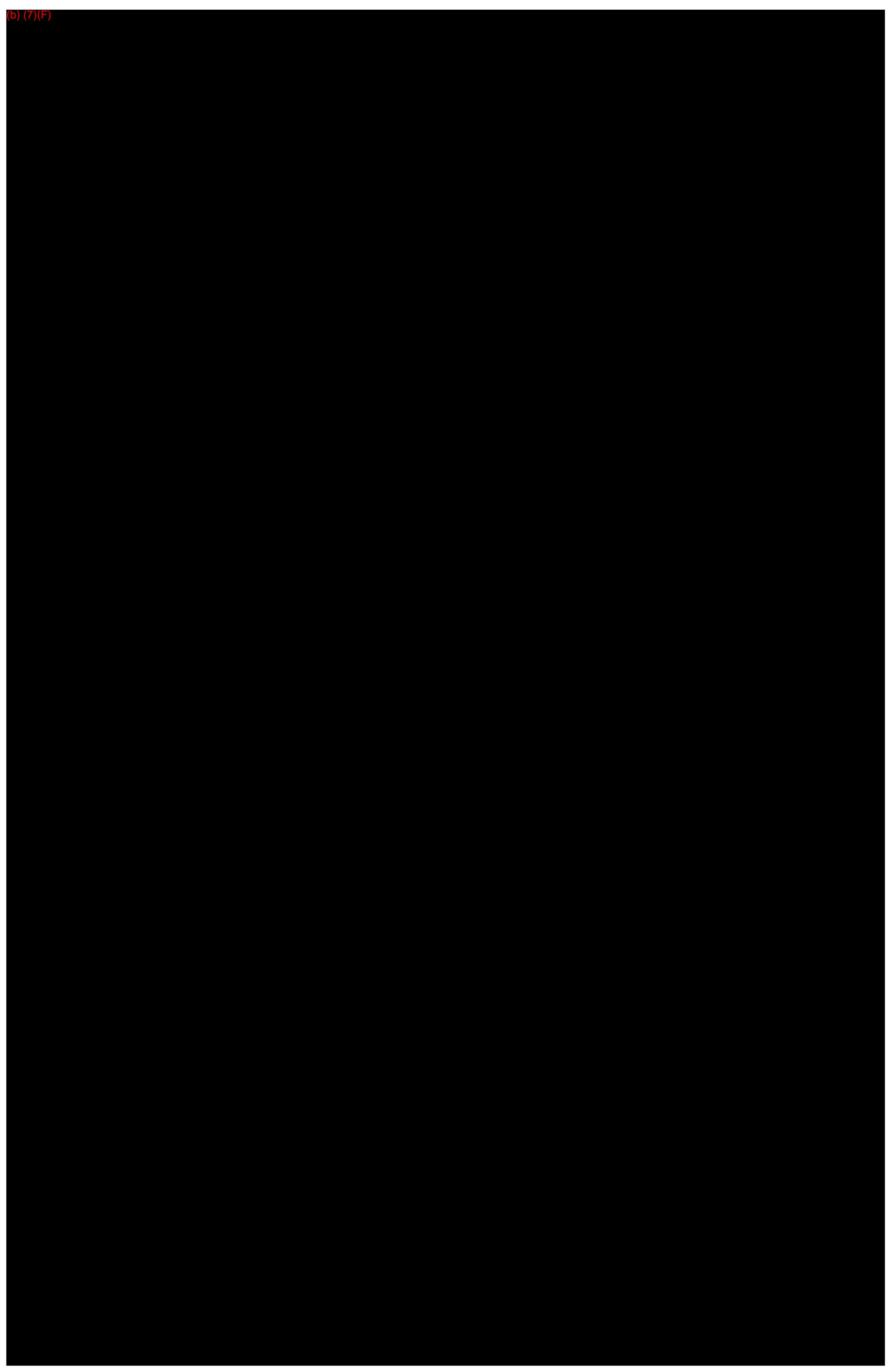
Marine
Transfer
Link Files

(b) (7)(F)

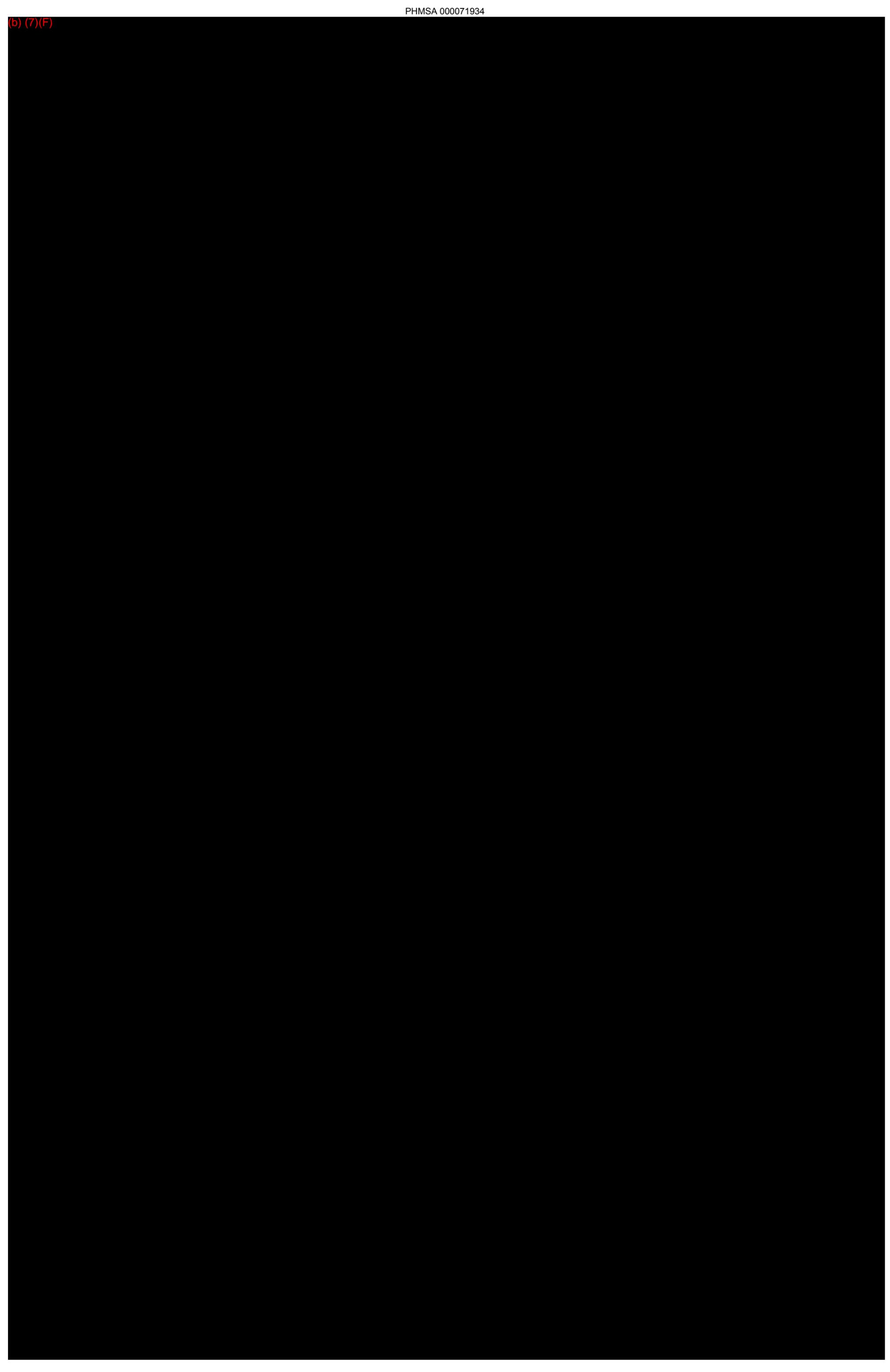


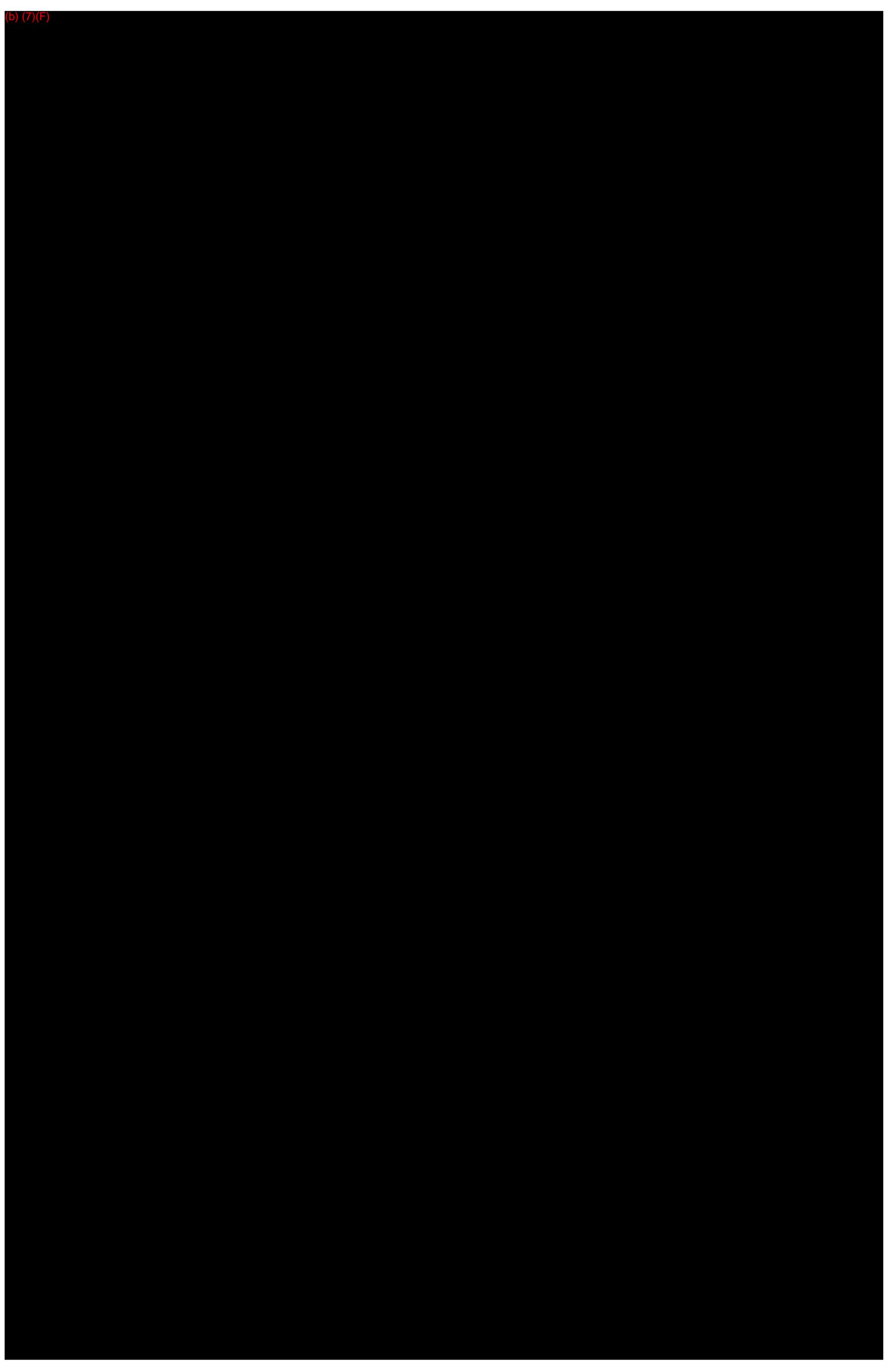


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(b) (7)(F)

