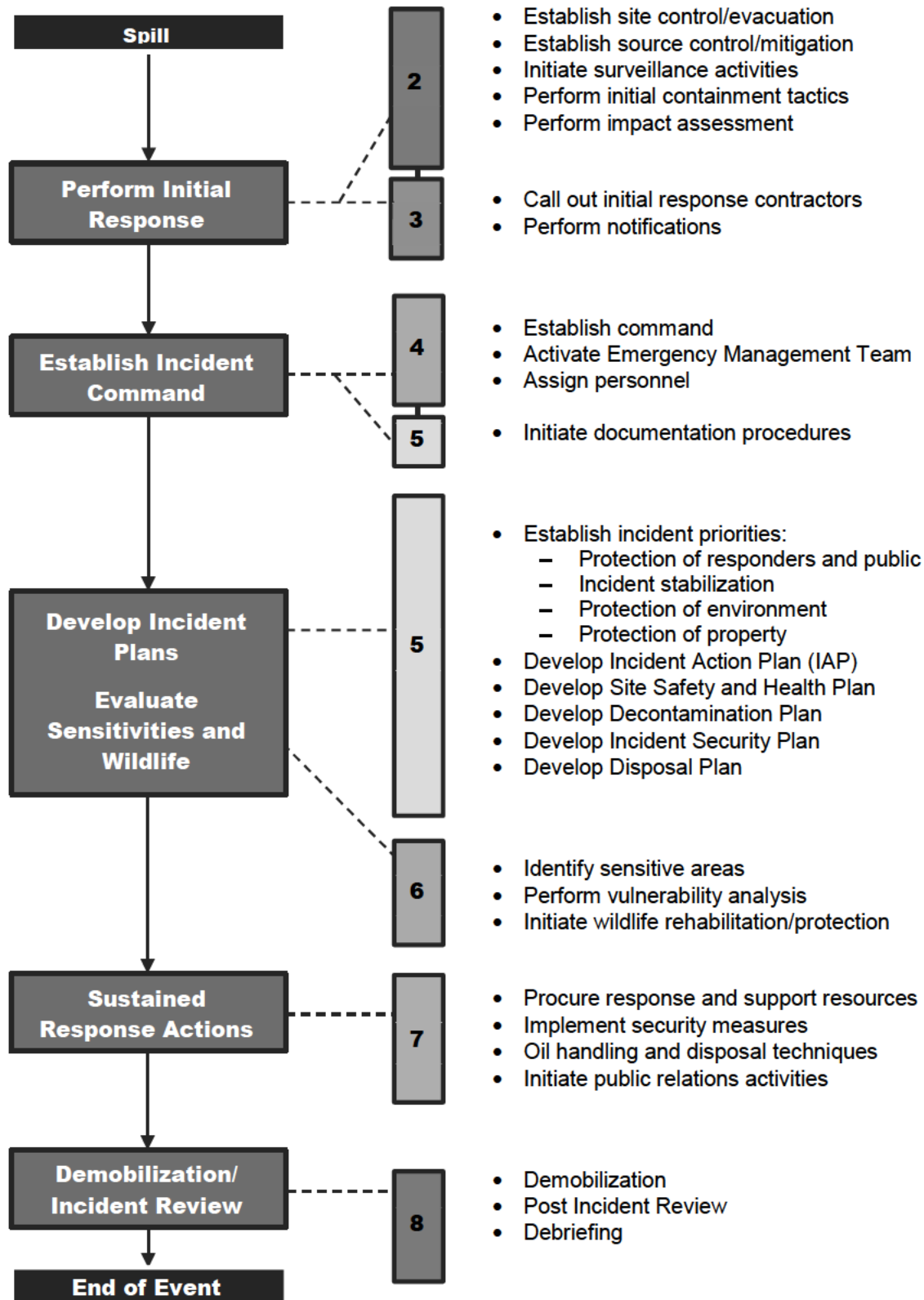




Colorado Zone Oil Spill Response Plan

3030 NW Expressway, Suite 1100, Oklahoma City, OK 73112, 405-945-6300

RESPONSE PROCEDURES FLOW CHART



1. Introduction

2. Initial
Response
Actions3. Notifications
Phone
Numbers4. Response
Team
Organization5. Incident
Planning6. Sensitive
Areas
Response Tactics7. Sustained
Response
Actions8. Demobilization
Post Incident
Review

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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 Department and the Health and Safety Department in conjunction with the Area Supervisor/Manager of Operations.

CHANGE NUMBER	DATE OF CHANGE	DESCRIPTION OF CHANGE	PAGE NUMBER
1	1/29/2009	Section 6.7	
2	1/29/2009	Appendix B.1-1	
3	1/29/2009	Section 3 Figure 3.1-3	
4	1/29/2009	Section 7.1.1	
5	1/29/2009	Appendix C.4	
6	1/29/2009	Section 1 Figure 1-2	
7	3/7/2011	Section 3 Figure 3.1-3	
8	3/8/2011	Section 1 Figure 1-2	
9	1/19/2012	Appendix F	
10	6/7/2012	Section 3 Figure 3.1-3	
11	6/7/2012	Section 3 Figure 3.1-3	
12	6/7/2012	Section 3 Figure 3.1-3	
13	6/7/2012	Section 3 Figure 3.1-3	
14	6/7/2012	Section 3 Figure 3.1-3	
15	6/7/2012	Section 3 Figure 3.1-3	
16	6/7/2012	Section 3 Figure 3.1-3	
17	6/7/2012	Section 3 Figure 3.1-3	
18	6/7/2012	Section 1 Figure 1-1	
19	6/7/2012	Section 1 Figure 1-2	
20	6/7/2012	Section 3 Figure 3.1-3	
21	6/7/2012	Section 3 Figure 3.1-3	
22	6/7/2012	Section 7.1.6	
23	6/7/2012	Section 7.1.6	
24	6/27/2012	Section 1.3	
25	8/28/2013	Section 1.2, 1.3, 6.5, 6.7	
26	8/28/2013	Section 3, Fig.3.1-2, Fig.3.1-3, Fig. 3.1-4	
27	8/28/2013	Section 7, Fig 7.1-1; Appendix B Fig. B1.1	
28	9/6/2013	Section 1.1, added EPA Cont. Plans	Page 15
29	9/6/2013	Fig. 1-2, and Appendix C	Page 11 and 258
30	10/18/2013	Section 1, 2, 3, 6, and 7	

SECTION 1 INTRODUCTION

Revised August 28, 2013

Figure 1-1 - Distribution List

Figure 1-2 - Colorado Zone Information Summary

Figure 1-3 - System Pipeline Overview Map

Figure 1-4 – Colorado Zone Map

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

FIGURE 1-1 - DISTRIBUTION LIST

PLAN HOLDER	ADDRESS	NUMBER OF COPIES		DISTRIBUTION DATE
		PAPER	ELECTRONIC	
Rose Rock Midstream L.P.	3030 NW Expressway STE: 1100 Oklahoma City, OK 73112	1	1	
Response Plans Officer - Pipeline and Hazardous Material Safety - U.S. Department of Transportation	1200 New Jersey Ave. SE., Room E22-210 Washington, DC 20590	0	2	
White Cliffs Pipeline, LLC	23751 Weld County Rd 30 Hudson, CO 7317380642	1	1	

FIGURE 1-2 - COLORADO ZONE INFORMATION SUMMARY

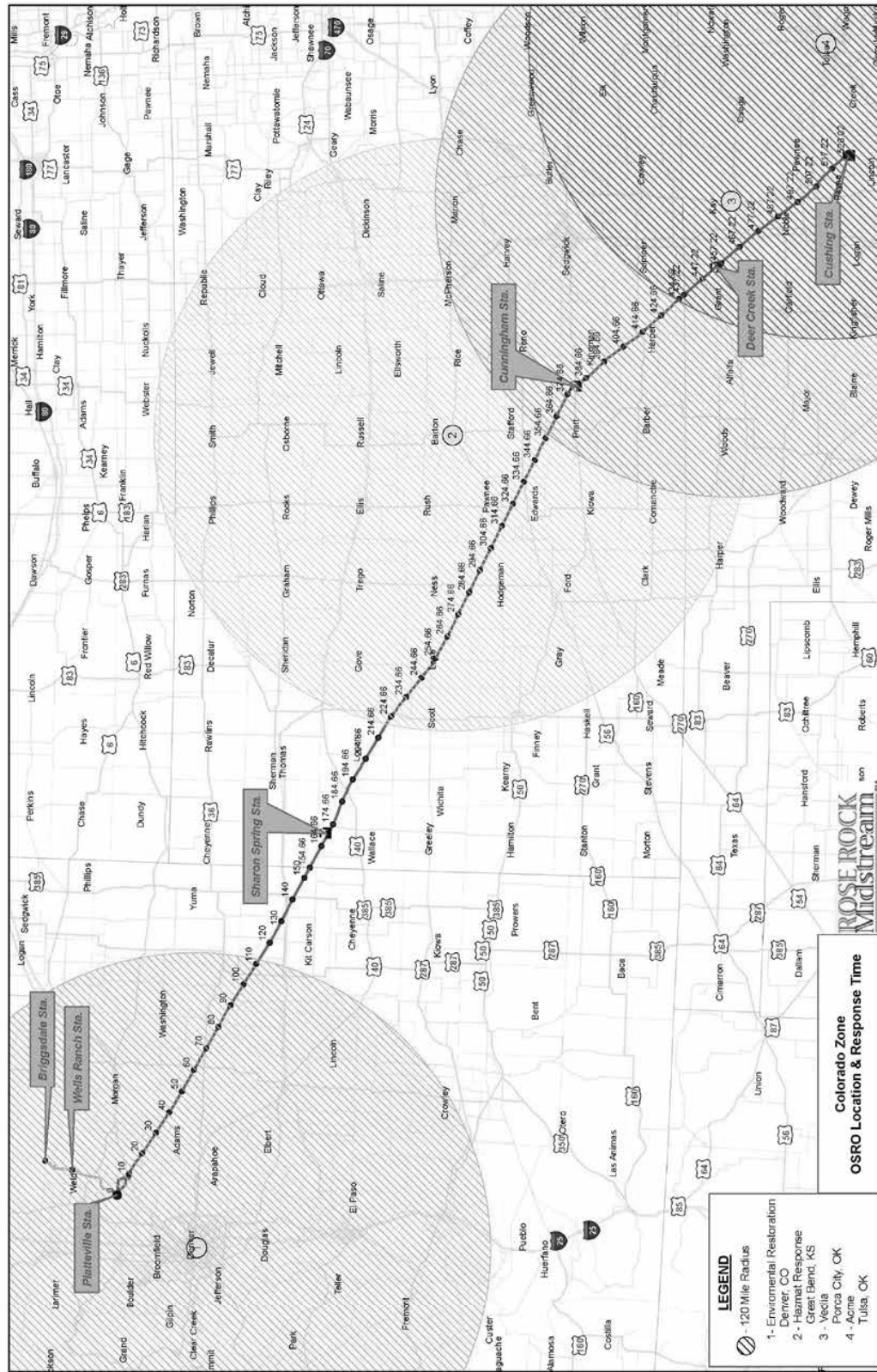
Owner/Operator:	Rose Rock Midstream L.P. 3030 NW Expressway STE: 1100 Oklahoma City, OK 73112													
Zone Name:	Colorado Zone													
Zone Mailing Address:	23751 Weld County Rd 30 Hudson, CO 80642													
Zone Telephone/Fax:	(800) 522-3883 /													
Qualified Individuals:	<table border="1"> <thead> <tr> <th></th> <th>Work</th> </tr> </thead> <tbody> <tr> <td>Hugh Barry Area Supervisor – Platteville, CO (303) 536-4742 (Office) (303) 217-3460 (Mobile)</td> <td>23751 CR 30 Hudson, CO 80642</td> </tr> <tr> <td>Norm Terry Maintenance Tech – Platteville, CO</td> <td>23751 CR 30 Hudson, CO 80642</td> </tr> <tr> <td>Pete Schwiering President (405) 945-6304 (Office) (b) (6) (405) 760-1134 (Mobile)</td> <td>3030 NW Expressway STE: 1100 Oklahoma City, OK 73112</td> </tr> <tr> <td>David Minielly Vice President - Operations (405) 945-6310 (Office) (b) (6) (405) 618-7773 (Mobile)</td> <td>3030 NW Expressway STE: 1000 Oklahoma City, OK 73112</td> </tr> </tbody> </table>			Work	Hugh Barry Area Supervisor – Platteville, CO (303) 536-4742 (Office) (303) 217-3460 (Mobile)	23751 CR 30 Hudson, CO 80642	Norm Terry Maintenance Tech – Platteville, CO	23751 CR 30 Hudson, CO 80642	Pete Schwiering President (405) 945-6304 (Office) (b) (6) (405) 760-1134 (Mobile)	3030 NW Expressway STE: 1100 Oklahoma City, OK 73112	David Minielly Vice President - Operations (405) 945-6310 (Office) (b) (6) (405) 618-7773 (Mobile)	3030 NW Expressway STE: 1000 Oklahoma City, OK 73112		
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David Minielly Vice President - Operations (405) 945-6310 (Office) (b) (6) (405) 618-7773 (Mobile)	3030 NW Expressway STE: 1000 Oklahoma City, OK 73112													
Line Sections/ Products Handled: (Refer to Product Characteristic and Hazards, FIGURE 0.9-1)	<table border="1"> <thead> <tr> <th>SECTION</th> <th>PRODUCTS</th> </tr> </thead> <tbody> <tr> <td>Platteville to Lindon Scraper Trap (73.2 Miles) 12 inch</td> <td>Crude Oil</td> </tr> <tr> <td>Lindon Scraper Trap to Sharron Springs (100.65 Miles) 12 inch</td> <td>Crude Oil</td> </tr> <tr> <td>Briggsdale Truck Facility to Wells Ranch (13.2 Miles) 12 inch</td> <td>Crude Oil</td> </tr> <tr> <td>Wells Ranch to Platteville (25.3 Miles) 12 inch</td> <td>Crude Oil</td> </tr> <tr> <td>Platteville to Plains Rail facility (11.8 Miles) 12 inch</td> <td>Crude Oil</td> </tr> </tbody> </table>		SECTION	PRODUCTS	Platteville to Lindon Scraper Trap (73.2 Miles) 12 inch	Crude Oil	Lindon Scraper Trap to Sharron Springs (100.65 Miles) 12 inch	Crude Oil	Briggsdale Truck Facility to Wells Ranch (13.2 Miles) 12 inch	Crude Oil	Wells Ranch to Platteville (25.3 Miles) 12 inch	Crude Oil	Platteville to Plains Rail facility (11.8 Miles) 12 inch	Crude Oil
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Wells Ranch to Platteville (25.3 Miles) 12 inch	Crude Oil													
Platteville to Plains Rail facility (11.8 Miles) 12 inch	Crude Oil													
Description of Zone:	The pipeline carries product (including Crude Oil) in the areas shown in FIGURE 1-4 and FIGURE 1-5 The zone consists of the White Cliffs Pipeline that originates in Platteville, Colorado and extends to the Sharron Springs pump station with an intermediate scraper trap at Lindon. Additionally, it consists of a second line segment known as the Wattenberg Oil Trunk Line that originates at the Briggsdale Truck Facility and terminates at the Platteville Terminal with an intermediate station at Wells Ranch. A third pipeline, the Tampa line, originates at Platteville Terminal and terminates at the Plains railcar facility.													
PHMSA Approval#:	SC49													
Response Zone Consists of the Following Counties:	(Colorado) – Weld, Morgan, Adams, Washington, Kit Carson. (Kansas) – Sherman, Wallace													
Alignment Maps (Piping, Plan Profiles):	Maintained at: Rose Rock Midstream office - Oklahoma City, Oklahoma and the White Cliffs pipeline office in Platteville Station – Platteville, Colorado													
Worst Case Discharge:	(b) (7)(F)													
Spill Detection and Mitigation Procedures:	Refer to SECTION 2 and APPENDIX D.													
Statement of Significant and Substantial Harm:	The response zone in this system contains pipelines greater than 6 5/8 inches and are longer than ten miles. At least one section of pipeline in the 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), the entire response zone described in this Plan will be treated as if expected to cause significant and substantial harm.													

Date Prepared:	January 2009
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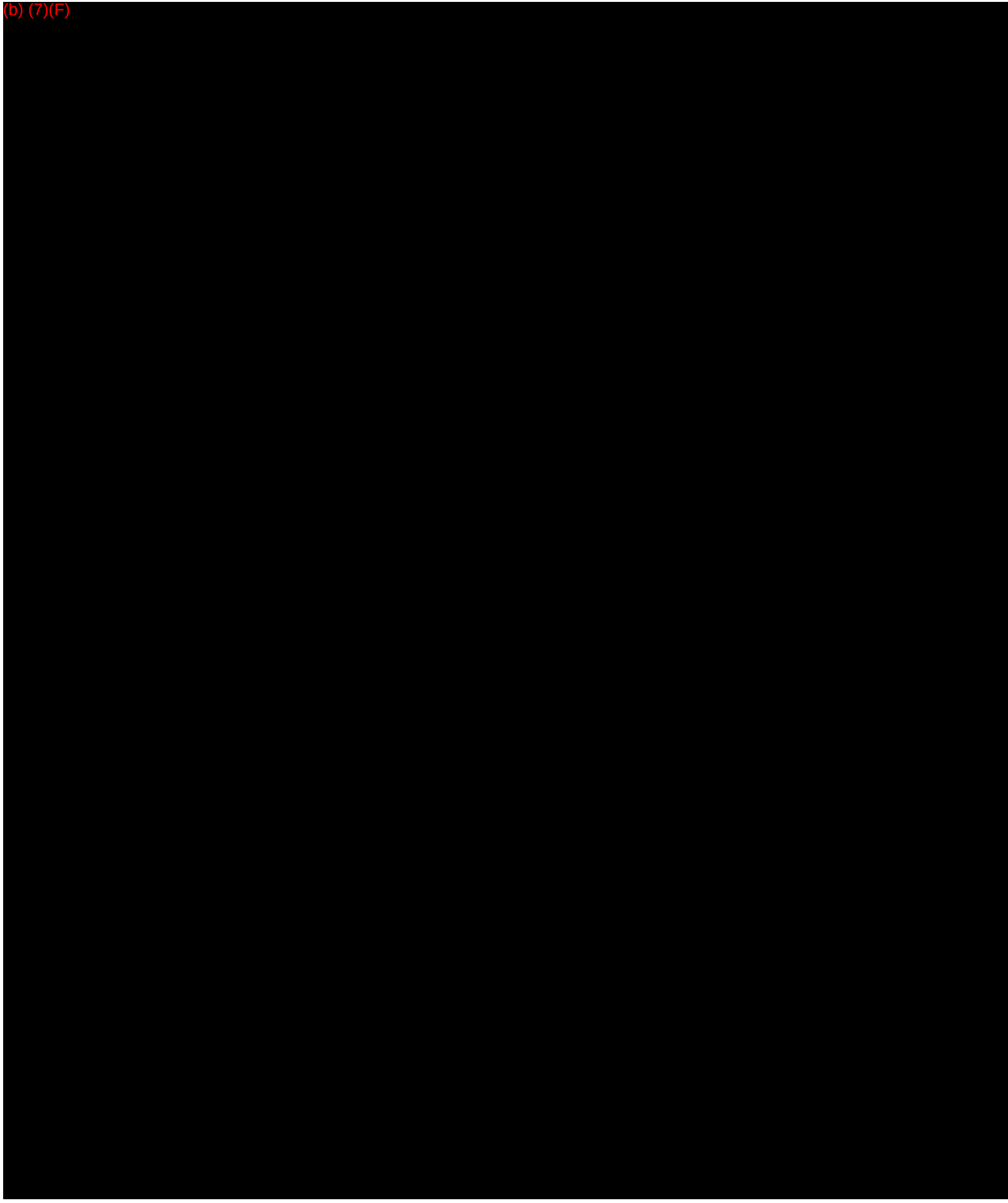
The information contained in this Plan is intended to be used as a guideline for the spill responder. Actual circumstances will vary and will dictate the procedures to be followed, some of which may not be included in this manual.

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

FIGURE 1-3- SYSTEM OVERVIEW MAP



(b) (7)(F)



(b) (7)(F)



1.1 PURPOSE / SCOPE OF PLAN

The purpose of this Spill Response Plan (Plan) is to provide guidelines to quickly, safely, and effectively respond to a spill. The pipeline is operated by Rose Rock Midstream L.P., 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), which include the EPA Region VII Integrated Contingency Plan and the EPA Region VIII Area Contingency 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)
- Occupational Safety and Health Administration (OSHA) requirements for emergency response plans (EAP and ERP) (29 CFR 1910)

1.2 PLAN REVIEW AND UPDATE PROCEDURE

In accordance with 49 CFR Part 194.121, this Plan will be reviewed annually and modified to address new or different operating conditions or information included in the Plan. Upon review of the response plan for each five-year period, revisions will be submitted to PHMSA provided the changes to the current plan are needed, or a letter stating that the plan is still current. Company internal policy states that the Plan will be reviewed at least annually and modified as appropriate. In the event the Company experiences a Worst Case Discharge, the effectiveness of the plan will be evaluated and updated as necessary. If a new or different operating condition or information would substantially affect the implementation of the Plan, the Company will modify the Plan to address such a change and, within 30 days of making such a change, submit the change to PHMSA.

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

CONDITIONS REQUIRING REVISIONS AND SUBMISSIONS
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.
A change in the type of oil handled, stored, or transferred that materially alters the required response resources.
A change in key personnel (Qualified Individuals).
A change in the name of the Oil Spill Removal Organization (OSRO).
Any other changes that materially affect the implementation of the Plan.
A change in the NCP or ACP that has significant impact on the equipment appropriate for response activities.

All requests for changes must be made through the Director of EHS and DOT Compliance and will be submitted to PHMSA.

The most current version of the plan is always the electronic copy. Revisions to the site-specific information are made through the password protected maintenance interface. The date at the beginning of each Section indicates the last date that Section was revised. Any revisions made after that date need to be reprinted and inserted in to the paper copy of the plan.

1.3 CERTIFICATION OF ADEQUATE RESOURCES

CERTIFICATION

Pursuant to the Clean Water Act Section 311(j)(5)(F)
Rose Rock Midstream L.P.

Rose Rock Midstream L.P., hereby certifies to the Pipeline Hazardous Material 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.

A handwritten signature in black ink, appearing to read "David Minielly", written in a cursive style.

David Minielly
VP of Operations

1.4 AGENCY SUBMITTAL / APPROVAL LETTERS

From: Coen, Edith
To: "John.Hess@dot.gov"
Cc: "Eddie.Murphy@dot.gov"; Coen, Edith
Subject: approval to fill line
Date: Friday, September 06, 2013 5:28:00 PM

Hello. I have made the changes recommended by Eddie including listing the EPA Region VII Integrated Contingency Plan and the EPA Region VIII Area Contingency Plan in section 1.1, page 15 of our Emergency Manual. I also added Kit Carson County, Colorado, to the location of the WCD. I have notified our word processor that we have some formatting issues with the forms section so she can address those next week.

Please let me know if we do not have approval to fill the line with crude oil on Monday.

Thank you for your help. if you need to contact me please call my cell phone at 918-640-3384.

Edith Coen
Director, Corporate Environmental, Health and Safety
DOT Compliance
SemGroup, Corp

Facility Response Plan Review
United States Department of Transportation
Pipeline and Hazardous Materials Safety Administration (PHMSA)
Office of Pipeline Safety (OPS)

OPS Sequence Number: Request from PHMSA

Facility Response Plan Version Date:

April 2009

Pipeline Operator Name:

SemCrude, LP – Colorado Zone

Contact Name:

Edith Coen

Contact Office, Fax, and Cellular Telephone Numbers:

Office – (405) 691-5016

Cell – (918) 640-3384

Contact Mailing Address:

11501 I-44 Service Road

Oklahoma City, OK 73173

Contact Electronic Mail Address:

ecoen@SEMGROUPLP.COM

If different from the Contact Name, Facility Response Plan Author Name:

Greg Desmond

Facility Response Plan Author Office, Fax, and Cellular Phone Numbers:

281-955-9600 ext. 115 (Office)

Facility Response Plan Author Mailing Address:

9720 Cypresswood Drive Suite 340

Houston, TX 77070

Facility Response Plan Author Electronic Mail Address:

gdesmond@trpcorp.com

Date of Review:

April 2009

National Contingency Plan and Area Contingency Plan Certifications

For Sequence Number: Request from PHMSA

1. A. Has the operator reviewed the National Contingency Plan (NCP) and each applicable Area Contingency Plan (ACP)? B. Does the Facility Response Plan follow the Area Contingency Plans? C. Please list the names of the Area Contingency Plans and the pages in the Facility Response Plan that relate to the Area Contingency Plans. (49 CFR 194.107(b)) **Yes, the operator has reviewed the National Contingency Plan (NCP) and applicable Area Contingency Plan (ACP). The Facility Response Plan also follows the Area Contingency Plans. A list of the Area Contingency Plans can be found in the Facility Response Plan in Section 1.1 on page 8.**

Area Contingency Plans and Related Pages: **Section 1.1 Purpose / Scope of Plan**

Comment:

Recommendation:

Plan Information Summary
For Sequence Number: Request from PHMSA

2. Does the Plan Information Summary contain the following? (49 CFR 194.107(c)(1), (c)(1)(i) and (c)(2) and 49 CFR 194.113) **Yes, the Plan Information Summary contains each of the following.**

- The Operator Name, Street Address, City, State, and Zip Code **Yes, the Operator Name, Street Address, City, State, and Zip Code can be found in the Facility Response Plan in Figure 1-2 on page 3.**

A list of response zones that meet the criteria for significant and substantial harm (49 CFR 194.113(a)(2)) and a list of response zones in which a worst-case discharge could cause substantial harm **Yes, a list of response zones that meet the criteria for significant and substantial harm (49 CFR 194.113(a)(2)) and a list of response zones in which a worst-case discharge could cause substantial harm can be found in the Facility Response Plan in Figure 1-2 on page 5.**

The basis for the operator's determination that the response zone meets the criteria for significant and substantial harm and a statement that a worst-case discharge in the response zone can be expected to cause significant and substantial harm for each response zone. **Yes, the basis for the operator's determination that the response zone meets the criteria for significant and substantial harm and a statement that a worst-case discharge in the response zone can be expected to cause significant and substantial harm for each response zone can be found in the Facility Response Plan in Figure 1-2 on page 5.**

Description of each response zone, including the County(s) or Parish(es) and State(s) **Yes, a description of the each response zone, including the County(s) or Parish(es) and State(s) can be found in the Facility Response Plan in Figure 1-2 on page 5.**

Explanation for each response zone designation **Yes an explanation for each response zone designation can be found in the Facility Response Plan in Figure 1-2 on page 5.**

- Name(s), title(s), and office and cellular telephone number(s) for the Qualified Individual(s) twenty-four hours a day in each response zone. **Yes, the name(s), title(s), and office and cellular telephone number(s) for the Qualified Individual(s) twenty-four hours a day in each response zone can be found in the Facility Response Plan in Figure 1-2 on page 3.**
- Name(s), title(s), and office and cellular telephone number(s) for the Alternate Qualified Individual(s) twenty-four hours a day in each response zone. **Yes, the name(s), title(s), and office and cellular telephone number(s) for the Alternate Qualified Individual(s) twenty-four hours a day in each response zone can be found in Figure 1-2 on page 3.**
- List of line sections in each response zone by milepost, survey station number, or other operator designation. **Yes, a list of line sections in each response zone by milepost, survey station number, or other operator designation can be found in the Facility Response Plan in Figure 1-2 on page 4.**
- If any response zone contains multiple pipeline systems, all pipeline systems are described and the oils they transport are listed. **Yes, the response zone does contain multiple systems. All pipeline systems are described and the oils they transport are listed in the Facility Response Plan in Figure 1-2 on page 4.**
- The type of oil and the volume of the worst-case discharge in each response zone? **Yes, the type of oil and the volume of the worst-case discharge in each response zone can be found in the Facility Response Plan in Figure 1-2 on page 5.**

Page Reference: **Figure 1-2 - Information Summary**

Comment: Recommendation:

Notifications

For Sequence Number: Request from PHMSA

3.1 What person, position, or facility is responsible for starting immediate notification? (49 CFR 194.107(c)(1)(ii)) Please list the person's, position's, or facility's mailing and electronic mail addresses and office, fax, and cellular telephone information. **Yes, the person, position, or facility that is responsible for starting immediate notification, including mailing and electronic mail addresses and office, fax, and cellular telephone information can be found in the Facility Response Plan in Figure 1-2 on page 3 and in Section 3.1 on page 2.**

Page Reference: **Figure 1-2 - Information Summary and Section 3.1 Emergency Information and Notification Procedures**

Comment: Recommendation:

3.2 Is the person, position, or facility capable of starting immediate notification twenty-four hours a day, three hundred sixty-five days a year? (49 CFR 194.107(c)(1)(ii)) Please describe your immediate notification plan. **Yes, the person, position, or facility is capable of starting immediate notification twenty-four hours a day, three hundred sixty-five days a year. Refer to the Facility Response Plan in Section 3.1 on page 2 and in Figure 3.1-3 on pages 8 through 9 for a description of the immediate notification plan.**

Page Reference: **Section 3.1 Emergency Information and Notification Procedures and Figure 3.1-3 - Notifications and Telephone Numbers**

Comment: Recommendation:

3.3 Do the Facility Response Plan notification procedures include telephone numbers so that the qualified individual(s) and oil spill removal organization(s) can be reached twenty-four hours a day, three hundred sixty-five days a year? (49 CFR 194.107(b)(1) and (2), 194.107(c)(1)(ii) and 194.113(b)(2)) **Yes, the Facility Response Plan notification procedures include telephone numbers so that the qualified individual(s) and oil spill removal organization(s) can be reached twenty-four hours a day, three hundred sixty-five days a year. Refer to the Facility Response Plan in Figure 3.1-3 on pages 8 through 9 and 18 through 19.**

- Qualified Individual(s)? : **Yes, qualified individual(s) information can be found in the Facility Response Plan in Figure 3.1-3 on pages 8 through 9.**
- Oil Spill Removal Organization(s)? : **Yes, Oil Spill Removal Organization(s) can be found in the Facility Response Plan in Figure 3.1-3 on pages 18 through 19 and in Section B.1.1 on pages 2 through 3.**
- Are the National Response Center numbers correctly listed as 1-800-424-8802 and 202-267-2675 in the plan? : **Yes, the National Response Center numbers are correctly listed as 1-800-424-8802 and 202-267-2675 in the Facility Response Plan. Refer to the Facility Response Plan in Figure 3.1-3 on page 10.**
- Company personnel? : **Yes, Company personnel information can be found in the Facility Response Plan in Figure 3.1-3 on pages 8 through 9.**

Page Reference: **Figure 3.1-3 - Notifications and Telephone Numbers and Appendix B.1.1 OSRO Classification**

Comment: Recommendation:

3.4 Does the notification section include the following information? (49 CFR 194.107(b)(1) and (2), and 194.107(c)(1)(ii))

- Name of pipeline operator? : **Yes, the name of the pipeline operator can be found in the Facility Response Plan in Figure 3.1-2 on pages 4 through 7.**
- Time of discharge? : **Yes, the time of discharge can be found in the Facility Response Plan in Figure 3.1-2 on page 4.**
- Location of discharge? : **Yes, the location of discharge can be found in the Facility Response Plan in Figure 3.1-2 on page 4.**
- Name of oil involved? : **Yes, the name of the oil involved can be found in the Facility Response Plan in Figure 3.1-2 on page 4.**
- Reason for discharge? : **Yes, the reason for discharge can be found in the Facility Response Plan in Figure 3.1-2 on page 4.**
- Estimated volume of oil discharged? : **Yes, the estimated volume of oil discharged can be found in the Facility Response Plan in Figure 3.1-2 on page 4.**
- Weather conditions on scene? : **Yes, the weather conditions on scene can be found in the Facility Response Plan in Figure 3.1-2 on pages 4 through 7.**

Page Reference: **Figure 3.1-2 - Accident Report - Hazardous Pipeline Systems**

Comment:

Recommendation:

3.5 Does the Facility Response Plan name and give the address(es) and telephone number(s) for the operator's oil spill removal organization(s)? (49 CFR 194.107(c)(1)(iv) and 194.115)

- Name(s)? : **Yes, the Facility Response Plan provides the name(s) of the operator's oil spill removal organization(s) in Section B.1.1 on pages 2 through 3.**
- Address(es)? : **Yes, the Facility Response Plan provides the address(es) of the operator's oil spill removal organization(s) in Section B.1.1 on pages 2 through 3.**
- Telephone Number(s)? : **Yes, the Facility Response Plan provides the telephone number(s) of the operator's oil spill removal organization(s) in Figure 3.1-3 on pages 18 through 19.**

Page Reference: **Appendix B.1.1 OSRO Classification and Figure 3.1-3 - Notifications and Telephone Numbers**

Comment: Recommendation:

Spill Detection and Mitigation Procedures
For Sequence Number: Request from PHMSA

- 4.1** Does the Facility Response Plan contain procedures to name and mitigate or prevent a substantial threat of a worst-case discharge? (49 CFR 194.107(a) and (b)(2)(i)) **Yes, the Facility Response Plan contains procedures to name and mitigate or prevent a substantial threat of a worst-case discharge in Section C.2 on page 5.**

Page Reference: **Appendix C.2 Worst Case Discharge (WCD) Scenario**

Comment: Recommendation:

- 4.2** Does the Facility Response Plan name personnel, equipment, and procedures for detecting leaks and spills and locating spills throughout the response zone? (49 CFR 194.107(c)(1)(iii)): **Yes, the Facility Response Plan names personnel, equipment, and procedures for detecting leaks and spills and locating spills throughout the response zone in Section 2.1.1 on page 5 and in Section C.1 on pages 2 through 4.**

Page Reference: **Section 2.1.1 Spill Detection and Mitigation Procedures** and **Appendix C.1 Spill Detection**

Comment: Recommendation:

- 4.3** Does the Facility Response Plan name the maximum time to detect the spill and shut down flow in affected pipeline(s) in bad weather? (49 CFR 194.105(b)(1)): **Yes, the Facility Response Plan names the maximum time to detect the spill and shut down flow in affected pipeline(s) in bad weather in Section C.4 on pages 7 through 9.**

Page Reference: **Appendix C.4 Spill Volume Calculations**

Comment: Recommendation:

- 4.4** Does the Facility Response Plan have procedures to mitigate spills appropriate for the response zone(s) and consistent with applicable Area Contingency Plan(s)? (49 CFR 194.107(b)(2)(i), and (c)(1)(iii) and (v)) **Yes, the Facility Response Plan has procedures to mitigate spills appropriate for the response zone(s) and is consistent with applicable Area Contingency Plan(s). Refer to the Facility Response Plan in Section 2.1.1 on page 5 and in Section C.1 on pages 2 through 4.**

Spill Containment
For Sequence Number: Request from PHMSA

Page Reference: **Section 2.1.1 Spill Detection and Mitigation Procedures** and **Appendix C.1 Spill Detection**

Comment: Recommendation:

- 5.1** Does the Facility Response Plan name spill containment strategies appropriate for the response zone(s) and consistent with applicable Area Contingency Plans? (49 CFR 194.107(b)(1)(iii), (b)(2)(i), and (c)(1)(v)) **Yes, the Facility Response Plan names spill containment strategies appropriate for the response zone(s) and it is consistent with applicable Area Contingency Plans. Refer to the Facility Response Plan in Section 6.2**

on pages 2 through 6.

Page Reference: **Section 6.2 Spill Containment / Recovery**

Comment: Recommendation:

- 5.2** Can planned spill containment activities be accomplished within the appropriate tier times? (49 CFR 194.107(b)(2)(i) and (c)(1)(v), and 194.115) **Yes, planned spill containment activities can be accomplished within the appropriate tier times. Refer to the Facility Response Plan in Section 6.2 on pages 2 through 6, in Section 7.1.2 on page 6, and in Section B.1.1 on pages 2 through 3.**

Page Reference: **Section 6.2 Spill Containment / Recovery, Section 7.1.2 Response Equipment Inspection and Maintenance, and Appendix B.1.1 OSRO Classification**

Comment: Recommendation:

- 5.3** Are containment equipment capacities described in sufficient detail and does the Facility Response Plan identify enough spill containment equipment to respond to a worst-case discharge to the maximum extent practicable? (49 CFR 194.107(b)(2)(i) and (c)(1)(v), and 194.115) **Yes, containment equipment capacities are described in sufficient detail and the Facility Response Plan identifies enough spill containment equipment to respond to a worst-case discharge to the maximum extent practicable. Refer to the Facility Response Plan in Section 7.1.1 on pages 3 through 4, in Figure 7.1-1 on page 5, and in Section B on pages 1 through 5.**

Page Reference: **Section 7.1.1 Response Equipment, Figure 7.1-1 Regional Company and Response Contractor's Equipment List / Response Time, and Appendix B Contractor Response Equipment**

Comment: Recommendation:

Spill Recovery

For Sequence Number: Request from PHMSA

- 6.1** Does the Facility Response Plan identify the spill recovery strategies appropriate for the response zone(s) and consistent with applicable Area Contingency Plan(s)? (49 CFR 194.107(b)(1)(iii), (b)(2)(i) and (iv), and (c)(1)(v)): **Yes, the Facility Response Plan identifies the spill recovery strategies appropriate for the response zone(s) and is consistent with applicable Area Contingency Plan(s). Refer to the Facility Response Plan in Section 6.2 on pages 2 through 6.**

Page Reference: **Section 6.2 Spill Containment / Recovery**

Comment: Recommendation:

- 6.2** Can planned spill recovery activities be accomplished within the appropriate tier times?
5.4 (49 CFR 194.107(b)(2)(i) and (c)(1)(v), and 194.115) **Yes, planned spill recovery activities can be accomplished within the appropriate tier times. Refer to the Facility Response Plan in Section 6.2 on pages 2 through 6, in Section 7.1.2 on page 6, and in Section B.1.1 on pages 2 through 3.**

Page Reference: **Section 6.2 Spill Containment / Recovery, Section 7.1.2 Response Equipment Inspection and Maintenance, and Appendix B.1.1 OSRO Classification**

Comment: Recommendation:

- 6.3** Are recovery equipment capacities described in sufficient detail and does the Facility Response Plan identify sufficient spill recovery equipment to respond to a worst-case discharge to the maximum extent practicable? (49 CFR 194.107(b)(2)(i) and (c)(1)(v), and 194.115) **Yes, recovery equipment capacities are described in sufficient detail and the Facility Response Plan identifies sufficient spill recovery equipment to respond to a worst-case discharge to the maximum extent practicable. Refer to the Facility Response Plan in Section 7.1.1 on pages 3 through 4, in Figure 7.1-1 on page 5, and in Section B on pages 1 through 5.**

Page Reference: **Section 7.1.1 Response Equipment, Figure 7.1-1 Regional Company and Response Contractor's Equipment List / Response Time, and Appendix B Contractor Response Equipment**

Comment: Recommendation:

Disposal**For Sequence Number: Request from PHMSA**

- 7.1** Does the Facility Response Plan identify disposal procedures, including temporary storage equipment for recovered oil appropriate for the response zone and consistent with applicable Area Contingency Plans? (49 CFR 194.107(b)(1)(iii), (b)(2)(i), and (c)(1)(v)) **Yes, the Facility Response Plan identifies disposal procedures, including temporary storage equipment for recovered oil appropriate for the response zone and is consistent with applicable Area Contingency Plans. Refer to the Facility Response Plan in Section 5.6 on pages 42 through 44 and in Section 7.4 on pages 17 through 22.**

Page Reference: **Section 5.6 Disposal Plan** and **Section 7.4 Waste Management**

Comment: Recommendation:

- 7.2** Can planned temporary storage and waste disposal activities be accomplished within the appropriate tier times? (49 CFR 194.107(b)(2)(i) and (c)(1)(v), and 194.115) **Yes, planned temporary storage and waste disposal activities can be accomplished within the appropriate tier times. Refer to the Facility Response Plan in Section 7.4 on pages 17 through 22 and in Section B.1.1 on pages 2 through 3.**

Page Reference: **Section 7.4 Waste Management** and **Appendix B.1.1 OSRO Classification**

Comment: Recommendation:

- 7.3** Does the Facility Response Plan identify sufficient temporary storage capabilities to respond to a worst-case discharge to the maximum extent practicable? (49 CFR 194.107(b)(2)(i) and (c)(1)(v), and 194.115) **Yes, the Facility Response Plan identifies sufficient temporary storage capabilities to respond to a worst-case discharge to the maximum extent practicable in Figure 7.4-3 on page 19.**

Page Reference: **Figure 7.4-3 Temporary Storage Methods**

Comment: Recommendation:

Sensitive Area Protection

For Sequence Number: Request from PHMSA

- 8.1** Does the Facility Response Plan identify the protection strategies appropriate for the response zone and consistent with applicable Area Contingency Plans? (49 CFR 194.107(b)(1)(iii), (b)(2)(i) and (ii), and (c)(1)(v)) **Yes, the Facility Response Plan identifies the protection strategies appropriate for the response zone and is consistent with applicable Area Contingency Plans in Section 6.3 on pages 7 through 11.**

Page Reference: **Section 6.3 Sensitive Area Protection**

Comment: Recommendation:

- 8.2** Can planned protection activities be accomplished within the appropriate tier times? (49 CFR 194.107(b)(2)(i) and (c)(1)(v), and 194.115) **Yes, planned protection activities can be accomplished within the appropriate tier times. Refer to the Facility Response Plan in Section 6.3 on pages 7 through 11, in Section 7.1.2 on page 6, and in Section B.1.1 on pages 2 through 3.**

Page Reference: **Section 6.3 Sensitive Area Protection, Section 7.1.2 Response Equipment Inspection and Maintenance, and Appendix B.1.1 OSRO Classification**

Comment:

Recommendation:

Response Management

For Sequence Number: Request from PHMSA

- 9.1** Is the response management system described in the Facility Response Plan based on an Incident Command System? (49 CFR 194.107(b)(1)(i), (b)(2)(iii), and (c)(3)) **Yes, the response management system described in the Facility Response Plan is based on an Incident Command System. Refer to the Facility Response Plan in Figure 3.1-3 on pages 8 through 20 and in Section 4.2 on page 2.**

Page Reference: **Figure 3.1-3 - Notifications and Telephone Numbers and Section 4.2 Activation Procedures**

Comment: Recommendation:

- 9.2** Does the operator's response organization describe roles and responsibilities for (49 CFR 194.107(b)(1)(i), (b)(2)(iii), and (c)(3))
- Qualified Individual? : **Yes, the roles and responsibilities for the Qualified Individual are described in the Facility Response Plan in Section 4.5 on pages 3 through 5.**
 - Other operator response personnel including the spill management team? : **Yes, the roles and responsibilities for other operator response personnel including the spill management team, are described in the Facility Response Plan in Section 4.6 on pages 6 through 30.**
 - Contracted Oil Spill Removal Organization(s)? : **Yes, the roles and responsibilities for contracted Oil Spill Removal Organization(s) are described in the Facility Response Plan in Section B on pages 1 through 5.**

Page Reference: **Section 4.5 Qualified Individual (QI), Section 4.6 Incident Management Team (IMT) Job Descriptions and Guidelines, and Appendix B Contractor Response Equipment**

Comment: Recommendation:

- 9.3** Does the operator's response organization describe how the operator works with the Unified Command and with responders including (49 CFR 194.107(b)(1)(i), (b)(2)(iii), and (c)(3)):

- Oil Spill Removal Organization(s)? : **Yes, a description of how the operator works with the Unified Command and with responders, including Oil Spill**

Removal Organization(s), are described in the Facility Response Plan in Section 4.1 on page 2.

- State and Local responders? : **Yes, a description of how the operator works with the Unified Command and with responders, including State and Local responders, are described in the Facility Response Plan in Section 4.4 on page 2 and in Section 4.6 on page 7.**
- Federal On-Scene Coordinator? : **Yes, a description of how the operator works with the Unified Command and with responders, including Federal On- Scene Coordinator, are described in the Facility Response Plan in Section 4.4 on page 2 and in Section 4.6 on page 7.**

Page Reference: **Section 4.1 Description, Section 4.4 Incident Management System / Unified Command, and Section 4.6 Incident Management Team (IMT) Job Descriptions and Guidelines**

Comment: Recommendation:

Communications, Response Equipment and Transportation For Sequence Number: Request from PHMSA

- 10.1** Does the Facility Response Plan describe appropriate communications procedures and system(s) adequate for notifications and response operations? (49 CFR 194.107(c)(1)(ii) and (v)) **Yes, the Facility Response Plan describes appropriate communications procedures and system(s) adequate for notifications and response operations in Section 7.1.6 on page 8.**

Page Reference: **Section 7.1.6 Communications Plan**

Comment: Recommendation:

- 10.2** Does the Facility Response Plan identify response equipment that the operator owns and maintains? (49 CFR 194.107(c)(1)(v) and 194.115(a)) **Yes, the Facility Response Plan identifies response equipment that the operator owns and maintains in Section 7.1.1 on pages 3 through 4.**

Page Reference: **Section 7.1.1 Response Equipment**

Comment: Recommendation:

- 10.3** Does the Facility Response Plan describe procedures for maintaining response equipment the operator owns? (49 CFR 194.107(c)(1)(viii)) **Yes, the Facility Response Plan describes procedures for maintaining response equipment the operator owns in Section 7.1.2 on page 6.**

Page Reference: **Section 7.1.2 Response Equipment Inspection and Maintenance**

Comment: Recommendation

- 10.4** Does the Facility Response Plan identify Oil Spill Removal Organization(s)' response equipment when the U.S. Coast Guard has not classified the Oil Spill Removal Organization? (49 CFR 194.107(c)(1)(v) and 194.115(a)) **Yes, the Facility Response Plan identifies Oil Spill Removal Organization(s)' response equipment when the U.S. Coast Guard has not classified the Oil Spill Removal Organization in Section B.1.1 on page 4, in Figure B.1-1 on page 5, and in Figure 7.1-1 on page 5.**

Page Reference: **Appendix B.1.1 OSRO Classification, Figure B.1-1 Evidence of Contracts and Equipment Lists, and Figure 7.1-1 - Regional Company and Response Contractor's Equipment List / Response Time**

Comment: Recommendation:

- 10.5** Does the Facility Response Plan describe procedures for maintaining Oil Spill Removal Organization(s)' response equipment when the U.S. Coast Guard has not classified the Oil Spill Removal Organization? (49 CFR 194.107(c)(1)(viii)) **Yes, the Facility Response Plan describes procedures for maintaining Oil Spill Removal Organization(s)' response equipment when the U.S. Coast Guard has not classified the Oil Spill Removal Organization in Section 7.1.3 on page 6.**

Page Reference: **Section 7.1.3 Contractors, Contractor Equipment, and Labor**

Comment: Recommendation:

- 10.6** Does the Facility Response Plan identify location(s) for operator-owned and Oil Spill Removal Organization-owned response equipment? (49 CFR 194.115(b)) **Yes, the Facility Response Plan identifies location(s) for operator-owned and Oil Spill Removal Organization-owned response equipment in Section 7.1.1 on pages 3 through 4 and in Section B on pages 1 through 5.**

Page Reference: **Section 7.1.1 Response Equipment and Appendix B Contractor Response Equipment**

Comment: Recommendation:

- 10.7** Does the Facility Response Plan describe mobilizing and deploying response equipment within the appropriate tier times consistent with the plan's response activities? (49 CFR 194.107(c)(1)(v) and 194.115(b)) **Yes, the Facility Response Plan describes mobilizing and deploying response equipment within the appropriate tier times consistent with the plan's response activities in Section 7.1.1 on pages 3 through 4, in Section 7.1.2 on page 6, and in Section B.1.1 on pages 2 through 3.**

Page Reference: **Section 7.1.1 Response Equipment, Section 7.1.2 Response Equipment Inspection and Maintenance, and Appendix B.1.1 OSRO Classification**

Comment:

Recommendation:

- 10.8** Does the size of the response zone permit planned response activities, including equipment mobilization and deployment, within the appropriate tier times? (49 CFR 194.115(b)) **Yes, the size of the response zone permits planned response activities, including equipment mobilization and deployment, within the appropriate tier times. Refer to the Facility Response Plan in Section 7.1.1 on pages 3 through 4 and in Section B.1.1 on pages 2 through 3.**

Page Reference: **Section 7.1.1 Response Equipment and Appendix B.1.1 OSRO Classification**

Comment: Recommendation:

Response Personnel and Mobilization

For Sequence Number: Request from PHMSA

- 11.1** Does the Facility Response Plan identify enough trained personnel to respond to the worst-case discharge consistent with the Plan's response activities? (49 CFR 194.107(a), (c)(1)(v), and (c)(3), 194.115, and 194.117): **Yes, the Facility Response Plan identifies enough trained personnel to respond to the worst-case discharge consistent with the Plan's response activities. Refer to the Facility Response Plan in Figure 3.1-3 on pages 8 through 9 and in Section B on pages 1 through 5.**

Page Reference: **Figure 3.1-3 Notifications and Telephone Numbers and Appendix B Contractor Response Equipment**

Comment: Recommendation:

- 11.2** Does the Facility Response Plan describe procedures for mobilizing and deploying response personnel throughout the response zone(s) consistent with the Plan's response activities? (49 CFR 194.107(b)(2)(i) and (c)(1)(v), and 194.115): **Yes, the Facility Response Plan describes procedures for mobilizing and deploying response personnel throughout the response zone(s) consistent with the Plan's response activities. Refer to the Facility Response Plan in Section 3.1 on page 2, in Figure 3.1-1 on page 3, in Section 4.2 on page 2, and in Figure 2.1-1 on pages 3 through 4.**

Page Reference: **Section 3.1 Emergency Information and Notification Procedures, Figure 3.1-1 Emergency Notification Flow Chart, Section 4.2 Activation Procedures, and Figure 2.1-1 Spill Response Action Checklist**

Comment: Recommendation:

**Response Documentation and Worst Case Discharge
For Sequence Number: Request from PHMSA**

- 12.1** Does the operator describe procedures the response management organization must use to document response decisions, activities, and costs? (49 CFR 194.107(c)(3)) **Yes, the operator describes procedures the response management organization must use to document response decisions, activities, and costs in the Facility Response Plan in Section 5.1 on page 3.**

Page Reference: **Section 5.1 Documentation Procedures**

Comment: Recommendation:

- 12.2** Does the Facility Response Plan provide the calculations and methodology used for determining the worst-case discharge for the response zone(s)? (49 CFR 194.105) **Yes, the Facility Response Plan provides the calculations and methodology used for determining the worst-case discharge for the response zone(s) in Section C.4 on pages 7 through 9.**

Page Reference: **Appendix C.4 Spill Volume Calculations**

Comment: Recommendation:

- 12.3** Is the worst-case discharge volume calculated using the three specified methods in the Department of Transportation regulation? Are the calculations accurate and as prescribed? (49 CFR 194.105(b)) **Yes, the worst-case discharge volume is calculated using the three specified methods in the Department of Transportation regulation and the calculations are accurate and as prescribed. Refer to the Facility Response Plan in Section C.4 on pages 7 through 9.**

Page Reference: **Appendix C.4 Spill Volume Calculations**

Comment: Recommendation:

**Training: Program and Procedures
For Sequence Number: Request from PHMSA**

- 13.1** Does the Facility Response Plan describe a training program that teaches response personnel about the Plan and their responsibilities under the Plan? (49 CFR

194.107(b)(1)(ii), (c)(1)(vii) and (c)(3), and 194.117): **Yes, the Facility Response Plan describes a training program that teaches response personnel about the Plan and their responsibilities under the Plan in Section A.2 on pages 10 through 13.**

Page Reference: **Appendix A.2 Training Program**

Comment: Recommendation:

13.2 Does the Facility Response Plan describe a training program that teaches response personnel about matters including (49 CFR 194.117(a)(3)):

- Oil characteristics and hazards? : **Yes, the Facility Response Plan describes a training program that teaches response personnel about matters including oil characteristics and hazards in Figure A.2-2 on pages 11 through 12.**
- Conditions that are likely to worsen emergencies, including the consequences of facility malfunctions or failures and appropriate corrective actions? : **Yes, the Facility Response Plan describes a training program that teaches response personnel about matters including conditions that are likely to worsen emergencies, including the consequences of facility malfunctions or failures and appropriate corrective actions in Figure A.2-2 on pages 11 through 12.**
- Steps necessary to control an accidental discharge of oil? : **Yes, the Facility Response Plan describes a training program that teaches response personnel about matters including steps necessary to control an accidental discharge of oil in Figure A.2-2 on pages 11 through 12.**
- Steps necessary to minimize the potential for fire, explosion, or environmental damage? : **Yes, the Facility Response Plan describes a training program that teaches response personnel about matters including steps necessary to minimize the potential for fire, explosion, or environmental damage in Figure A.2-2 on pages 11 through 12.**
- Proper fire-fighting procedures and use of personal protective equipment? : **Yes, the Facility Response Plan describes a training program that teaches response personnel about matters including proper fire-fighting procedures and use of personal protective equipment in Figure A.2-2 on pages 11 through 12.**

Page Reference: **Figure A.2-2 PREP Training Program Matrix**

Comment: Recommendation:

13.3 Does the Facility Response Plan describe a response-training program that addresses the appropriate levels of training and the requirements in OSHA 29 CFR 1910.120? (49 CFR 194.107(b)(1)(ii) and 194.117(c)) **Yes, the Facility Response Plan describes a response- training program that addresses the appropriate levels of training and the requirements in OSHA 29 CFR 1910.120 in Figure A.2-1 on page 10.**

Page Reference: **Figure A.2-1 - Training Requirements**

Comment: Recommendation:

13.4 Does the Facility Response Plan describe the operator's procedures for maintaining records for response personnel? (49 CFR 194.117(b)) **Yes, the Facility Response Plan describes the operator's procedures for maintaining records for response personnel in Figure A.1-2 on page 4 and in Figure A.2-1 on page 10.**

Page Reference: **Figure A.1-2 Exercise Requirements and Figure A.2-1 Training Requirements**

Comment: Recommendation:

Spill Response Drill Program
For Sequence Number: Request from PHMSA

14.1 Does the Facility Response Plan describe procedures for conducting internal and external drills that include (49 CFR 194.107(c)(1)(ix)):

- Responsibility for planning, carrying out, and monitoring drills? : **Yes, the Facility Response Plan describes procedures for conducting internal and external drills that include responsibility for planning, carrying out, and monitoring drills in Section A.1 on page 2.**
- Announced drills? : **Yes, the Facility Response Plan describes procedures for conducting internal and external drills that include announced drills in Figure A.1-2 on page 4.**
- At least one unannounced internal drill? : **Yes, the Facility Response Plan describes procedures for conducting internal and external drills that include at least one unannounced internal drill in Figure A.1-2 on page 4.**
- Quarterly Qualified Individual notifications drills? : **Yes, the Facility Response Plan describes procedures for conducting internal and external drills that include quarterly Qualified Individual notifications drills in Figure A.1-2 on page 4.**
- Annual spill management team tabletop drills? : **Yes, the Facility Response Plan describes procedures for conducting internal and external drills that include annual spill management team tabletop drills in Figure A.1-2 on page 4.**
- Annual Oil Spill Removal Organization(s) equipment deployment drills of representative types and amounts of key equipment in the Facility Response Plan?
: **Yes, the Facility Response Plan describes procedures for conducting internal and external drills that include annual Oil Spill Removal Organization(s) equipment deployment drills of representative types and amounts of key equipment in the Facility Response Plan in Figure A.1-2 on page 4.**
- At least one drill that tests the entire response plan for each response zone at least once every three years? : **Yes, the Facility Response Plan describes procedures for conducting internal and external drills that include at least one drill that tests the entire response plan for each response zone at least once every three years in Figure A.1-2 on page 4.**

Page Reference: **Appendix A.1 Exercise Requirements and Schedules and Figure A.1-2 Exercise Requirements**

Comment:

Recommendation:

14.2 Does the Facility Response Plan describe a three-year drill and exercise cycle and the frequencies for each type of drill in that cycle? (49 CFR 194.107(c)(1)(ix)) **Yes, the Facility Response Plan describes a three-year drill and exercise cycle and the frequencies for each type of drill in that cycle in Section A.1 on page 2 and in Figure A.1-2 on page 4.**

Page Reference: **Appendix A.1 Exercise Requirements and Schedules and Figure A.1-2 Exercise Requirements**

Comment: Recommendation:

- 14.3** Does the Facility Response Plan describe procedures for maintaining drill documentation for three years? (49 CFR 194.107(c)(1)(ix)) **Yes, the Facility Response Plan describes procedures for maintaining drill documentation for three years in Figure A.1-2 on page 4.**

Page Reference: **Figure A.1-2 Exercise Requirements**

Comment: Recommendation:

Response Plan Maintenance
For Sequence Number: Request from PHMSA

- 15.1** Does the Facility Response Plan describe the requirements and procedures for the operator to (a) review the Facility Response Plans at least once every five years from the date the Office of Pipeline Safety approves the plan, (b) modify the Facility Response Plan to address new or different operating conditions or information in the Facility Response Plan, and (c) submit the plan for the Office of Pipeline Safety to review, require changes, and approve? (49 CFR 194.107(c)(1)(x) and 194.121(a)) **Yes, the Facility Response Plan describes the requirements and procedures for the operator to (a) review the Facility Response Plans at least once every five years from the date the Office of Pipeline Safety approves the plan, (b) modify the Facility Response Plan to address new or different operating conditions or information in the Facility Response Plan, and (c) submit the plan for the Office of Pipeline Safety to review, require changes, and approve in Section 1.2 on page 9.**

Page Reference: **Section 1.2 Plan Review and Update Procedure**

Comment: Recommendation:

- 15.2** Does the Facility Response Plan identify key factors that may cause revisions to the response plan and require the operator to submit revisions to the Office of Pipeline Safety within 30 days of making the revisions for factors including: (49 CFR 194.121(b)):
- New pipeline construction or purchase? : **Yes, the Facility Response Plan identifies key factors that may cause revisions to the response plan and requires the operator to submit revisions to the Office of Pipeline Safety within 30 days of making the revisions for factors including new pipeline construction or purchase in Section 1.2 on page 9.**
 - Different worst-case discharge volume? : **Yes, the Facility Response Plan identifies key factors that may cause revisions to the response plan and requires the operator to submit revisions to the Office of Pipeline Safety within 30 days of making the revisions for factors including different worst- case discharge volume in Section 1.2 on page 9.**
 - Change in commodities transported? : **Yes, the Facility Response Plan identifies key factors that may cause revisions to the response plan and requires the operator to submit revisions to the Office of Pipeline Safety within 30 days of making the revisions for factors including change in commodities transported in Section 1.2 on page 9.**
 - Change in Oil Spill Removal Organization(s)? : **Yes, the Facility Response Plan identifies key factors that may cause revisions to the response plan and requires the operator to submit revisions to the Office of Pipeline Safety within 30 days of making the revisions for factors including change in Oil Spill Removal Organization(s) in Section 1.2 on page 9.**
 - Change in Qualified Individual(s)? : **Yes, the Facility Response Plan identifies key factors that may cause revisions to the response plan and requires the operator to submit revisions to the Office of Pipeline Safety within 30 days of making the revisions for factors including change in Qualified Individual(s) in Section 1.2 on page 9.**
 - Change in a National Contingency Plan or Area Contingency Plan that has a significant impact on the appropriateness of response equipment or response strategies? : **Yes, the Facility Response Plan identifies key factors that may cause revisions to the response plan and requires the operator to submit revisions to the Office of Pipeline Safety within 30 days of making the revisions for factors including change in a National Contingency Plan or Area Contingency Plan that has a significant impact on the appropriateness of response equipment or response strategies in Section 1.2 on page 9.**

- Change in response procedures? : **Yes, the Facility Response Plan identifies key factors that may cause revisions to the response plan and requires the operator to submit revisions to the Office of Pipeline Safety within 30 days of making the revisions for factors including change in response procedures in Section 1.2 on page 9.**

Page Reference: **Section 1.2 Plan Review and Update Procedure**

Comment: Recommendation:

15.3 Does the Facility Response Plan describe procedures for incorporating improvements in the following? (49 CFR 194.121(b)(8))

- Post-drill evaluation results? : **Yes, the Facility Response Plan describes procedures for incorporating improvements in post-drill evaluation results in Figure A.1-2 on page 4.**
- Post-incident evaluation results? : **Yes, the Facility Response Plan describes procedures for incorporating improvements in post-incident evaluation results in Section 8.3 on pages 4 through 6.**

Page Reference: **Figure A.1-2 Exercise Requirements** and **Section 8.3 Post-Incident Review**

Comment: Recommendation:

National Contingency Plan and Area Contingency Plan Consistency and Concept of Operations

For Sequence Number: Request from PHMSA

16.1 Is the Plan consistent with the National Contingency Plan in effect at the time of submission? (49 CFR 194.107(b)(1)) Please answer yes or no. **Yes, the Plan is consistent with the National Contingency Plan in effect at the time of submission.**

Page Reference: **Entire Plan**

Comment: Recommendation:

16.2 Is the Plan consistent with the Area Contingency Plans in effect for each response zone at the time of submission? (49 CFR 194.107(b)(2)) Please answer yes or no. **Yes, the Plan is consistent with the Area Contingency Plans in effect for each response zone at the time of submission.**

Page Reference: **Entire Plan**

Comment: Recommendation:

16.3 Is the Plan's concept of operations adequate to carry out a response to the worst-case discharge under 49 CFR 194? (49 CFR 194.107) Please answer yes or no. **Yes, the Plan's concept of operations is adequate to carry out a response to the worst-case discharge under 49 CFR 194.**

Page Reference: **Entire Plan**

Comment: Recommendation:



1995 ✦ 2005
10 YEARS OF EXCELLENCE

April 1, 2009

Melanie M. C. Barber
Environmental Planning Officer
United States Department of Transportation
Office of Pipeline Safety
Room E22-210
1200 New Jersey Avenue, S.E.
Washington, D.C. 20590

RE: PHMSA Sequence Number #Unknown SemCrude, LP - White Cliff Zone

Dear Ms. Barber:

Enclosed are two CD's of the SemCrude, LP - White Cliff Zone Response Zone Oil Spill Response Plan for your review and approval. Please direct all questions and correspondence to Edith Coen (DOT Compliance and Safety Manager) at 11501 I-44 Service Road, Oklahoma City, OK 73173 or (405) 691-5016.

Sincerely,
TECHNICAL RESPONSE PLANNING CORPORATION

Greg Desmond
Senior Project Manager

Federal Express



July 27, 2010

Office of Pipeline Safety
Pipeline and Hazardous Materials Safety Administration
PHP-80
1200 New Jersey Avenue, SE
Washington, DC 20590-0001

Re: OPS Sequence Number: Unknown – White Cliffs Response Zone

Via: **Overnight Mail**

Dear Sir,

White Cliffs Pipeline, LLC has reviewed our PHMSA Emergency Response Plan and revised it accordingly. The enclosed plan has been updated to reflect minor changes and names and titles and the worst case discharge has been revised due to the fact that the tank at our Platteville facility is not considered to be a break out tank per the definition in Part 194.

White Cliffs Pipeline has contacted our Oil Spill Response Contractor, ACME, and confirmed that they have adequate resources in place to respond “to the maximum extent practicable” to our worst case discharge.

Should you have any questions about these plans please contact me at 918-640-3384.

Sincerely,

Edith F. Coen
Manager of DOT Compliance and Safety
SemCrude, LP

Cc: P. Schwiering
D. Minielly

SECTION 2 INITIAL RESPONSE ACTIONS

Last revised: January 2005

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 - 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 Initial Response Actions

Figure 2.2-1 - Initial Response Action Checklist

2.3 Evacuation

2.4 Tornado

2.5 Flood

2.6 Medical

2.7 Bomb Threat

2.8 Hydrogen Sulfide (H₂S) Release

2.8.1 General Requirements

Figure 2.8-1 - Hydrogen Sulfide Effects

Figure 2.8-2 - Hydrogen Sulfide Initial Response Action Checklist

SECTION 2 INITIAL RESPONSE ACTIONS

2.8.2 Personal Respiratory Protection

2.9 Fire and/or Explosion

2.9.1 Storage Tank Seal Area Fire

2.9.2 Storage Tank Full Surface Fire

2.9.3 Dike Area, Piping or Manifold Fire

2.9.4 Vent Fires (Cone Roof Tanks with no Floating Roof)

2.9.5 Vapor Releases

2.10 Fire Pre-Plans

2.1 SPILL RESPONSE

FIGURE 2.1-1 - SPILL RESPONSE ACTION CHECKLIST

RESPONSE ACTION
DOCUMENT ALL ACTIONS TAKEN
First Person to Discover Spill
Immediately notify Operations Control Center and Qualified Individual or posted emergency contacts. Take appropriate action to protect life and ensure safety of personnel.
Immediately shut down operations (if applicable). (b) (7)(F)
Secure the scene. Isolate the area and assure the safety of people and the environment. Keep people away from the scene and outside the safety perimeter.
Qualified Individual
Assume role of Incident Commander until relieved.
Conduct preliminary assessment of health and safety hazards.
Evacuate non-essential personnel, notify emergency response agencies to provide security, and evacuate surrounding area (if necessary).
Make appropriate regulatory notifications (FIGURE 3.1-3).
• National Response Center • Appropriate State Agency
Call out spill response contractors (FIGURE 3.1-3).
If safe to do so, direct facility responders to shut down potential ignition sources in the vicinity of the spill, including motors, electrical pumps, electrical power, etc.
If safe to do so, direct facility responders to shut down and control the source of the spill. Be aware of potential hazards associated with product and ensure that flammable vapor concentrations are within safe atmosphere before sending personnel into the spill area.
If safe to do so, direct responders to stabilize and contain the situation. This may include berming or deployment of containment and/or sorbent boom.
For low flash oil (<100°F); consider applying foam over the oil, using water spray to reduce vapors, grounding all equipment handling the oil, and using non-sparking tools.
If there is a potential to impact shorelines, consider lining shoreline with sorbent or diversion boom to reduce impact.
Notify Local Emergency Responders.
Obtain the information necessary to complete the Oil Spill Report Form (FIGURE 3.1-2) and phone this information to the Environmental Department and the Health and Safety Department Manager.

FIGURE 2.1-1 - SPILL RESPONSE ACTION CHECKLIST, CONTINUED

RESPONSE ACTION
DOCUMENT ALL ACTIONS TAKEN
On-Scene Coordinator
Activate all or a portion of Incident Management Team (IMT) (as necessary). Liaison Officer will maintain contact with notified regulatory agencies.
Ensure the IMT has mobilized spill response contractors (if necessary). It is much better to demobilize equipment and personnel, if not needed, than to delay contacting them if they are needed.
Document all response actions taken, including notifications, agency/media meetings, equipment and personnel mobilization and deployment, and area impacted. (Refer to SECTION 5 for documentation.)
Water based Spills: Initiate spill tracking and surveillance operations. Determine extent of pollution via surveillance aircraft or vehicle. Estimate volume of spill utilizing information in SECTION 2.1.3. Send photographer / videographer if safe.
Land based Spills: Initiate spill tracking and surveillance if applicable.
SECONDARY RESPONSE ACTIONS (Refer to IMT job descriptions in SECTION 4.6)
FACILITY SPECIFIC RESPONSE CONSIDERATIONS (Refer to SECTION 6 for maps, tactical plans, and sensitivity information).

2.1.1 Spill Detection and Mitigation Procedures

See APPENDIX C.1 for spill detection protocols.

Each spill mitigation situation is unique and must be treated according to the circumstance present. In every situation, however, personnel safety must be assessed as the first priority. The potential for ignition and/or toxic exposure must be promptly evaluated. Spill mitigation procedures are listed in FIGURE 2.1-1. Discharge volume calculations are provided in APPENDIX C.

FIGURE 2.1-2 - SPILL MITIGATION PROCEDURES

TYPE	MITIGATION PROCEDURE
Failure of Transfer Equipment	1. Personnel safety is the first priority. Evacuate nonessential personnel or personnel at high risk. 2. Terminate transfer operations and close block valves. 3. Drain product into containment areas if possible. 4. Eliminate sources of vapor cloud ignition by shutting down all engines and motors.
Tank Overfill/Failure	1. Personnel safety is the first priority. Evacuate nonessential personnel or personnel at high risk. 2. Shut down or divert source of incoming flow to tank. 3. Transfer fluid to another tank with adequate storage capacity (if possible). 4. Shut down source of vapor cloud ignition by shutting down all engines and motors. 5. Ensure that dike discharge valves are closed. 6. Monitor diked containment area for leaks and potential capacity limitations. 7. Begin transferring spilled product to another tank as soon as possible.
Piping Rupture/Leak (under pressure and no pressure)	1. Personnel safety is the first priority. Evacuate nonessential personnel or personnel at high risk. 2. Shut down pumps. Close the closest block valves on each side of the rupture. 3. Drain the line back into contained areas (if possible). Alert nearby personnel of potential safety hazards. 4. Shut down source of vapor cloud ignition by shutting down all engines and motors. 5. If piping is leaking and under pressure, then relieve pressure by draining into a containment area or back to a tank (if possible). Then repair line according to established procedures.
Fire/Explosion	1. Personnel safety is the first priority. Evacuate nonessential personnel or personnel at risk of injury. 2. Notify local fire and police departments. 3. Attempt to extinguish fire if it is in incipient (early) stage and if it can be done safely. 4. Shut down transfer or pumping operation. Attempt to divert or stop flow of product to the hazardous area (if it can be done safely). 5. Eliminate sources of vapor cloud ignition shutting down all engines and motors. 6. Control fire before taking steps to contain spill. Also refer to fire/explosion response procedures in SECTION 2.9.
Manifold Failure	1. Personnel safety is the first priority. Evacuate nonessential personnel or personnel at high risk. 2. Terminate transfer operations immediately. 3. Isolate the damaged area by closing block valves on both sides of the leak/rupture. 4. Shut down source of vapor cloud ignition by shutting down all engines and motors. 5. Drain fluids back into containment areas (if possible).

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
- All surveillance should be done up wind of spill
- Dispatch observers to crossings downstream or down gradient to determine the spill's maximum reach
- Clouds, shadows, sediment, floating organic matter, submerged sand banks or wind-induced patterns on the water may resemble an oil slick if viewed from a distance
- Sorbent pads may be used to detect oil or water
- Use surface vessels to confirm the presence of any suspected oil slicks (if safe to do so); consider directing the vessels and photographing the vessels from the air, the latter to show their position and size relative to the slick
- It is difficult to adequately observe oil on the water surface from a boat, dock, or shoreline
- Spill surveillance is best accomplished through the use of helicopters or small planes; helicopters are preferred due to their superior visibility and maneuverability
- If fixed-wing planes are to be used, high-wing types provide better visibility than low-wing types
- All observations should be documented in writing and with photographs and/or videotapes
- Describe the approximate dimensions of the oil slick based on available reference points (i.e. vessel, shoreline features, facilities); use the aircraft or vessel to traverse the length and width of the slick while timing each pass; calculate the approximate size and area of the slick by multiplying speed and time
- Record aerial observations on detailed maps, such as topographic maps
- In the event of reduced visibility, such as dense fog or cloud cover, boats may have to be used to patrol the area and document the location and movements of the spill; however, this method may not be safe if the spill involves a highly flammable product
- Surveillance is also required during spill response operations to gauge the effectiveness of response operations; to assist in locating skimmers; and assess the spill's size, movement, and impact
- An Spill Surveillance Checklist is provided in FIGURE 2.1-3

FIGURE 2.1-3 - SPILL SURVEILLANCE CHECKLIST

Record your observations of spilled oil either in a notebook or directly on a chart of the area under observation. This checklist is an aid for organizing your observations.

General Information	
Date:	Tidal or river stage (flood, ebb, slack, low water):
Time:	On-scene weather (wind, sea state, visibility):
Incident name:	Platform (helicopter, fixed-wing aircraft, boat, shore):
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	
• During surveillance, 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):	

FIGURE 2.1-3 - SPILL SURVEILLANCE CHECKLIST, CONTINUED

Record your observations of spilled oil either in a notebook or directly on a chart of the area under observation. This checklist is an aid for organizing your observations.

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):
Spill Sketch

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	gallons/mile ²	liters/km ²
Barely Visible	0.0000015	0.00004	25	44
Silvery	0.000003	0.00008	50	88
Slightly colored	0.000006	0.00015	100	179
Brightly colored	0.000012	0.0003	200	351
Dull	0.00004	0.001	666	1,167
Dark	0.00008	0.002	1,332	2,237
Thickness of light oils: 0.0010 inches to 0.00010 inches				
Thickness of heavy oils: 0.10 inches to 0.010 inches				
NOAA, 09/2000				

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's 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. 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

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

2.2 INITIAL RESPONSE ACTIONS

FIGURE 2.2-1 - INITIAL RESPONSE ACTION CHECKLIST

To be used in conjunction with Section 2.3 through 2.9

SPECIFIC RESPONSE ACTIONS
DOCUMENT ALL ACTIONS TAKEN
First Person On-Scene
Assume the role of Incident Commander until relieved.
Take appropriate personal protective measures.
Notify Qualified Individual 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.
Qualified Individual
The Qualified Individual will assume or assign the role of Incident Commander.
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 specific to the incident (SECTION 2).
Request medical assistance if an injury has occurred.
Contact the Director of EHS to assess the situation
Make appropriate regulatory notifications (FIGURE 3.1-3).
• National Response Center – make notification within 1 hour • Appropriate State Agency
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.
Coordinate further initial response actions with local supervision and Incident Commander.
Incident Commander/Qualified Individual
Activate the Incident Management Team (IMT), as the situation demands (SECTION 4).
Activate additional response contractors and local response resources, as the situation demands (SECTION 3).
Evaluate the Severity, Potential Impact, Safety Concerns, and Response Requirements based on the initial information provided by the First Person On-Scene.
Confirm safety aspects at site, including need for personal protective equipment, sources of ignition, and potential need for evacuation.
Notify the next level of management, as appropriate. Provide incident briefing and coordinate activation of additional internal resources, as the situation demands.
Coordinate/complete additional Internal and External Notifications (SECTION 3).
Proceed to incident site and direct response and clean-up operations.
Designated IMT personnel will immediately respond to an incident at the Facility as the situation demands.
Perform response/cleanup operations as directed or coordinated by the Incident Commander.
Assist as directed at the incident scene.

2.3 EVACUATION

EVACUATION CHECKLIST
TASK
Request assistance from off-site agencies; convey Command Post's location
Assemble personnel at predetermined safe location: upwind/up gradient of release (assembly area)
Account for Company and contractor personnel
Assess casualties (number/type/location)
Determine probable location of missing personnel
Secure site, establish re-entry point and check-in/check-out procedures
Develop list of known hazards (confined spaces, electrical hazards, physical hazards, vapors, oxygen deficiency, fire/explosion, etc.)
Monitor situation (weather, vapors, product migration) for significant changes
Assist in developing a Rescue Plan if necessary

2.4 TORNADO

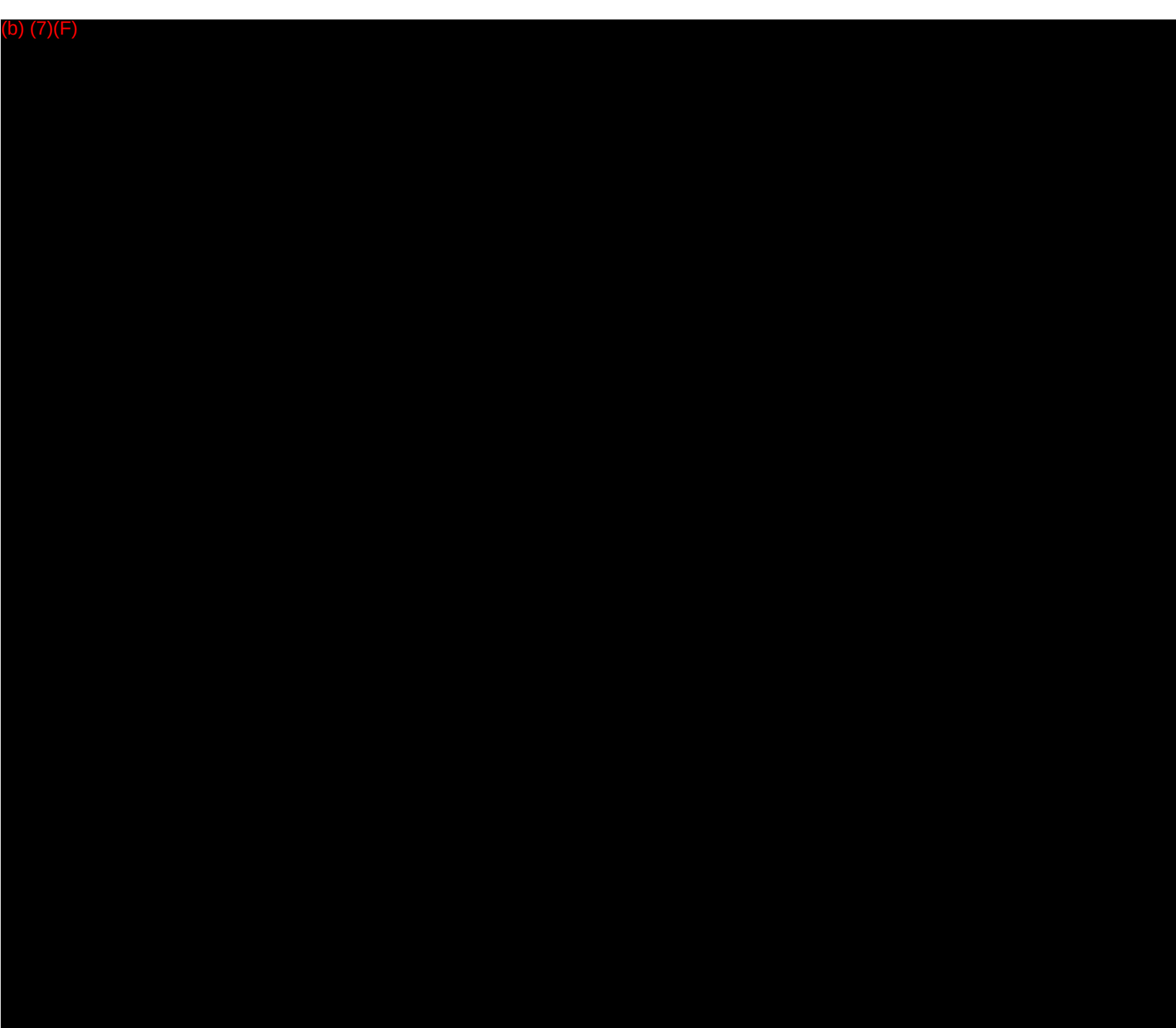
TORNADO CHECKLIST
TASK
Monitor news media reports (FIGURE 3.1-3)
• Tornado watch means conditions are favorable for tornadoes • Tornado warning means a tornado has been sighted
When a tornado warning is issued, sound the local alarm
Take shelter:
• Go to an interior room on the lowest floor • Get under a sturdy piece of furniture • Use your arms to protect head and neck
Have location personnel report to the designated area
Account for all personnel on duty
Look for funnel formations on the ground or in the clouds; listen for a roar that sounds like a jet aircraft or rail traffic
If the facility is damaged by the tornado, notify Management
Go to the scene of the incident to evaluate the situation
• Be aware of broken glass and downed power lines • Check for injuries • Use caution entering a damaged building
Update Supervisory Personnel/Management
Perform Initial Response Actions functions as stated in FIGURE 2.2-1
Conduct post-emergency evaluation and report

2.5 FLOOD

FLOOD CHECKLIST
TASK
Perform continuous monitoring of the situation by listening to radio and/or television reports (FIGURE 3.1-3)
- Flash flood watch means flooding is possible - Flash flood warning means flooding is occurring or is imminent
Update Supervisory Personnel when flooding is imminent
Establish an evacuation plan (SECTION 2.3)
Take preliminary actions to secure the facility before flooding and mandatory evacuation
Consider having sandbags brought to sites that could be affected by the flooding
Consider obtaining portable pumps and hoses from local suppliers or from other petroleum service locations in the area
Remove product from underground storage tanks (i.e., sumps and separators, if applicable) and replace with water to prevent them from floating out of the ground
Keep at least a normal bottom in all above ground tankage, more if possible
Plug all rack drains and facility drains connected to the sump
Empty all dikes of water
Ensure that tank roof drains are working properly
Anchor all bulk additive tanks, fuel barrels, empty drums, and propane tanks (if applicable)
Notify Supervisory Personnel/Management that the facility will be closed
Back up computer files
Remove assets such as files, computers, spare parts, and vehicles
Shut off high voltage power and natural gas lines
Close all valves on product and additive storage tanks
Before evacuation, know where all the employees will be residing and obtain phone numbers so they can be contacted if additional emergencies occur
Conduct a post-emergency evacuation and report
Notify control room of potential for flooding and possible damage to pipelines to enhance awareness
Conduct foot patrols and visual inspections of water crossings
Consider increased frequency of aerial patrol of pipelines
Maintain hazards awareness: - 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

2.6 MEDICAL

MEDICAL CHECKLIST
TASK
Summon Emergency Medical Services (EMS) to the scene (FIGURE 3.1-3)
Do not move the patient unless a situation (such as a fire) threatens their life
If trained, provide first aid until the EMS arrives at the scene
As the situation warrants, try to stop the bleeding and keep the patient breathing until the EMS arrives at the scene
The rescuer's role includes: ● Removing the patient from any situation threatening their life or the lives of rescuers ● Correcting life-threatening problems and immobilizing injured parts before transporting the patient ● Transporting the patient in a way that minimizes further damage to injured parts ● Administering essential life support while the patient is being transported ● Observing and protecting the patient until medical staff can take over ● Administering care as indicated or instructed



(b) (7)(F)

2.8 HYDROGEN SULFIDE (H₂S) RELEASE

One of the most toxic substances in crude oil transportation is hydrogen sulfide gas.

All crude oils contain some concentration of hydrogen sulfide (H₂S). Basically, crude oils are classified as either a sweet crude or sour crude, depending on the percent (by weight) concentration of sulfur contained within that specific type of crude.

Sweet crude containing sulfur in solution may not present an H₂S hazard, but H₂S analysis must be conducted to be sure.

- Sweet Crude - 0 to 0.50% sulfur (by weight)
- Sour Crude - over 0.50% sulfur (by weight)

Hydrogen sulfide is an extremely dangerous gas that may cause fatalities. It is colorless, may have a distinct rotten egg odor, is heavier than air, is soluble in fresh and salt water, and is highly flammable.

The key to handling sour crude safely is being knowledgeable of:

- established safety procedures to be followed,
- the hazards of H₂S and where they can be encountered in the work place, and
- the proper use and maintenance of H₂S monitoring and personal protective equipment.

H₂S can be in either a gas (air) or liquid (oil) state. H₂S levels can be higher in the air than in the oil from which it came.

2.8.1 General Requirements

- Employees will be aware of Hydrogen Sulfide and/or potential Hydrogen Sulfide work areas.
- Employees will monitor known and/or potential H₂S work areas with the appropriate atmospheric monitoring equipment and observe all warnings signs and wind indicators.
- All atmospheric monitoring equipment will be calibrated on a monthly basis and any problems with the equipment reported to the immediate Supervisor for repair/replacement.
- Employees will don a SCBA when H₂S levels are above 10 ppm.
- All company employees will implement the Buddy System when H₂S levels reach >100 ppm or when appropriate.

Potential effects of H₂S are listed in FIGURE 2.8-1. The levels at which these effects occur are guidelines and may be experienced at lower levels during certain health conditions (i.e. such as when you have a cold, allergies, or are taking medication).

Questions regarding H₂S exposure shall be communicated to the Safety Representative and/or the HSE Manager's representative the operations Supervisor in charge.

FIGURE 2.8-1 - HYDROGEN SULFIDE EFFECTS

LEVEL	EFFECTS
1 ppm	Rotten egg odor detectable.
10 ppm	OSHA, PEL Limit (8-hour) May experience eye and/or throat irritation.
15 ppm	OSHA, STEL Limit (15-minute) May experience eye and/or throat irritation.
100 ppm	OSHA, IDLH Limit (Immediately Dangerous) Sense of smell loss in seconds; increased eye/throat irritation.
300 ppm	Sense of smell loss; severe eye/throat irritation; headache, dizziness or nausea may occur.
>500 ppm	Rapid unconsciousness and respiratory paralysis; death can occur within minutes unless rescued promptly and given CPR.

FIGURE 2.8-2 - HYDROGEN SULFIDE INITIAL RESPONSE ACTION CHECKLIST

ACTION
1. Keep people away. Avoid contact with gas.
2. Stay upwind.
3. Wear a full faced self-contained breathing apparatus (SCBA) or goggles and a half faced SCBA.
4. Shut off ignition sources and call the fire department.
5. Evacuate area in case of large discharges.
6. Notify local health and pollution control agencies.
7. Protect water intakes.
If there is fire:
Flashback along vapor trail may occur and may explode if ignited in an enclosed area.
1. Wear a full faced self-contained breathing apparatus (SCBA) or goggles and a half faced SCBA.
2. Stop flow if possible.
3. Cool exposed containers and personnel effecting shutoff with water.
If there is exposure:
1. Call for medical aid. Vapor is poisonous if inhaled. It is also irritating to eyes.
2. If breathing has stopped, give artificial respiration.
3. If breathing is difficult, give oxygen.
4. If in EYES, hold eyelids open and flush with plenty of water.
If there is water pollution:
1. Protect water intakes.
2. Notify local health and wildlife officials. H ₂ S is harmful to aquatic life in very low concentrations.
3. Notify operators of nearby water intakes.

Source: Chemical Hazards Response Information System (CHRIS) Hazardous Chemical Data Manual, U.S. Department of Transportation, United States Coast Guard, 1998

2.8.2 Personal Respiratory Protection

Self-Contained Breathing Apparatus (SCBA) is the only approved respiratory protective equipment that can be used when working in a H₂S contaminated environment.

2.9 FIRE AND/OR EXPLOSION

Your first consideration is always the safety of people in the immediate area, including your own.

The first responder's initial objective is site management.

FIRE AND/OR EXPLOSION CHECKLIST
TASK
At a manned facility
Evaluate the situation; approach cautiously from upwind; do not rush in
Notify the local police and fire departments
Notify Operations Control and Qualified Individual
Appropriately trained personnel may attempt to extinguish the fire if it is in the incipient (early) stage and if it can be done safely
If the fire/explosion is a result of a pipe rupture, isolate product release by closing valves
Undertake basic site control: ● Make an assessment of hazards ● Isolate the area ● Keep people away from the scene and outside the safety perimeter ● Establish safety zones and escape routes
Respond to the fire: ● Establish a Command Post and lines of communication ● Maintain site control ● Establish Incident Command/Unified Command as necessary, refer to SECTION 4.4
Call in additional resources if on scene personnel and equipment are inadequate to handle the emergency
Conduct an incident investigation and document on incident investigation form

2.9 FIRE AND/OR EXPLOSION, CONTINUED

Your first consideration is always the safety of people in the immediate area, including your own.

The first responder's initial objective is site management.

FIRE AND/OR EXPLOSION CHECKLIST, CONTINUED	
TASK	
At an unmanned facility	
Notify the local police and fire departments	
Notify Operations Control and Qualified Individual	
Go to the incident scene to evaluate the situation; approach cautiously from upwind; do not rush in	
Undertake basic site control:	
● Make an assessment of hazards ● Isolate the area ● Keep people away from the scene and outside the safety perimeter ● Establish safety zones and escape routes	
If roads or railroads are in the affected area, assist the sheriff or local emergency officials with halting traffic	
Update next level manager	
If the fire/explosion is a result of a pipe rupture, isolate the product release by closing valves	
Respond to the fire:	
● Establish a Command Post and lines of communication ● Maintain site control ● Establish Incident Command/Unified Command as necessary, refer to SECTION 4.4	
Call in additional resources if on scene personnel and equipment are inadequate to handle the emergency	
Conduct an incident investigation and document on incident investigation form	

2.9.1 Storage Tank Seal Area Fire

STORAGE TANK SEAL AREA FIRE CHECKLIST	
TASK	
Determine if the storage tank has a fixed suppression system. Initiate the system using a guide, along with local system instruction, if applicable. If no fixed suppression system exists, then proceed with this section.	
Close all dike drains.	
Coordinate with the fire department to cool the tank shell in the immediate area of the fire. Priority should be given to cooling the area of the gauging platform if it is involved in fire.	
Develop plans to pump water from the affected tank's dike area. Consider pumping into adjacent dikes as a first choice.	
Notify the local fire department and fire response specialist (as necessary). Refer to FIGURE 3.1-3.	
DO NOT pump into or out of the tank - keep the floating roof stationary.	
Develop plans for pumping out the tank should the fire develop into a full-surface fire and align valves as necessary (provided this does not move the floating roof).	
Summon maintenance personnel to standby in case they are needed by the fire department.	

2.9.2 Storage Tank Full Surface Fire

STORAGE TANK FULL SURFACE FIRE CHECKLIST	
TASK	
If a dike fire exists in conjunction with a tank fire, extinguish the dike fire first. - See SECTION 2.9.3, Dike Area, Piping or Manifold Fire.	
Close all dike drain valves.	
Caution Do not create a back flow condition where product could flow into the tank or area on fire	
This should include all valves between the tank outlet and the manifold from which its contents will be distributed.	
Motor operated valves should be given priority over manual valves to assure they are properly positioned before a power/control failure occurs.	
Consider preparation for "drifting" or "sluicing" (gravity drainage) to adjacent tanks if pumping is not an option.	
Adjacent Tanks	
Floating Roof Tanks - Raise product level to maximum height. Do not move roof if tank shell has been deformed from heat.	
Cone Roof Tanks - Block in and do not change product level.	
Pump out burning tank at maximum volume	
If pumping capability is not available, seek alternate methods, such as gravity transfer to another tank.	
DO NOT transfer product into any cone roof tank in the same area as the fire. This may result in the liberation of vapors and additional fires.	
Protect the following from radiant heat: essential valve manifolds, pumps, transformers, and substations needed to affect tank pump-out. (Coordinate with Fire Department).	
Protection of exposed tanks is a secondary consideration. Cone roof tanks should be protected before floating roof tanks.	
Develop plans to pump water from the affected tank's dike area. Consider pumping into adjacent dikes as a first choice.	
Summon utility contractor or personnel to stand-by in case electrical repairs or re-routing becomes necessary during pump-out. Summon Maintenance personnel to stand-by in case they are needed by fire department.	
Upon arrival, tank fire experts will determine if extinguishment is feasible. If so, an attempt will be made to extinguish the fire. If not, the tank will be permitted to burn out until the fire declines to a point that is within the capabilities of the responders and the local water supply.	
Discontinue pumping out when liquid surface approaches top of tank nozzle. Watching the charring of the paint on the tank shell can determine tank level.	
Block in the tank once pumping out has been discontinued.	

2.9.3 Dike Area, Piping or Manifold Fire

DIKE AREA, PIPING OR MANIFOLD FIRE CHECKLIST	
TASK	
Cease transfer operations into affected tank/line(s)	
Isolate leak, if possible.	
Close all dike drains.	
If a tank contributing product to the fire cannot be isolated, two options exist: either pump down the tank or inject water to displace the product.	
Pump-down option	
Caution	
Do not create a back flow condition where product could flow into the tank or area on fire	
Open all valves in the immediate area necessary to pump-out of the burning tank.	
This should include all valves between the tank outlet and the manifold from which its contents will be distributed.	
Motor operated valves should be given priority over manual valves to assure they are properly positioned before a power/control failure occurs.	
Consider preparation for "drifting" or "sluicing" (gravity drainage) to adjacent tanks if pumping is not an option.	
Water Injection option	
Find location in piping or manifold that will support connection of fire apparatus and allow pumping of water to the leak point.	
Caution	
Ensure no back flow of product into fire apparatus	
Using a check valve to prevent backflow, pump water through fire apparatus to the piping and/or tank involved. The water will raise the level of the product, eventually resulting in water issuing from the failed section versus product. Assume 0.5 psi for every foot the product level is above the point of injection. Fire apparatus discharge pressure must be above product head pressure to assure no backflow.	
Extinguish adjacent fires	
Manually isolate the fuel source to the fire via previously inaccessible valves.	
Adjacent Tanks	
Floating Roof Tanks - Raise product level to maximum height. Do not move roof if tank shell has been deformed from heat.	
Cone Roof Tanks - Block in and do not change product level.	
Protect the following from radiant heat: essential valve manifolds, pumps, transformers, and substations needed to affect tank pump-out. (Coordinate with Fire Department).	
Protection of exposed tanks is a secondary consideration. Cone roof tanks should be protected before floating roof tanks.	
Summon electrical utility personnel and company electricians to stand-by in case electrical repairs or re-routing becomes necessary during pump-out. Summon Maintenance personnel to stand-by in case they are needed by fire department.	
Upon arrival, tank/petroleum fire experts will determine if extinguishment is feasible. If so, an attempt will be made to extinguish the fire. If not, the fire will be permitted to burn out until the fire declines to a point that is within the capabilities of the responders and the local water supply.	
Once dike area, piping or manifold fire is extinguished, address any storage tank fires. See SECTION 2.9.2 for Full Surface Fires, and SECTION 2.9.1 for Seal Area Fires.	

2.9.4 Vent Fires (Cone Roof Tanks with no Floating Roof)

VENT FIRES (CONE ROOF TANKS WITH NO FLOATING ROOF) CHECKLIST	
TASK	
Note This Section only applies to Cone Roof Tanks with a single vent, or just a few vents. If a full surface fire exists in this type of tank use SECTION 2.9.2, Storage Tank Full Surface Fire	
Discontinue transfer operations to tank and isolate.	
DO NOT pump tank out.	
Identify cause of vapor release from vents.	
If vapor release is the result of normal tank breathing (warming temperatures, filling):	
● Extinguish the fire with dry chemical, preferably from atop a fire department aerial apparatus. ● Coordinate with the fire department to cool the vent(s) and immediate roof area once the fire has been extinguished.	
If vapor release is due to product contamination (i.e.: propane, butane, etc.) or from heat of exposing fire:	
● Coordinate with the fire department to cool the vent(s) and immediate roof area. ● Allow fire to burn out.	

2.9.5 Vapor Releases

VAPOR RELEASES CHECKLIST	
TASK	
Danger Vapors may ignite with tremendous force. Do not enter vapor cloud. Approach from upwind and uphill. Monitor area with Combustible Gas Meter if possible	
Cease transfer operations.	
Isolate tank or piping.	
Eliminate all potential ignition sources.	
Close all dike drains	
Allow vapors to dissipate naturally	
Note Extinguishment of a vapor fire will allow uncontrolled vapors to spread	
If vapor ignition occurs, protect exposures and determine if fire extinguishment is appropriate. In some situations it is safer to allow the fire to burn and protect exposures.	

SECTION 3 NOTIFICATIONS / TELEPHONE NUMBERS

Last revised: August 28, 2013

3.1 Emergency Information and Notification Procedures

Figure 3.1-1 - Emergency Notification Flowchart

Figure 3.1-1(a) - Reporting Criteria for Incidents/ When to Consider Activating the Crisis Management Plan

Figure 3.1-2 - Accident Report - Hazardous Liquid Pipeline Systems

Figure 3.1-3 - Notifications and Telephone Numbers

Figure 3.1-4 - Reporting Requirements

3.1 EMERGENCY INFORMATION AND NOTIFICATION PROCEDURES

The notification sequence for a spill is as follows:

- Personnel will identify and control the source of a spill, if safe to do so, then will notify the Operations Control Center and Qualified Individual.
- The Qualified Individual will assume the role as Incident Commander (Qualified Individual) and will conduct notifications as illustrated in the Notification Flowchart (FIGURE 3.1-1).

The priority of actions and response procedures will depend upon actual circumstances and will be determined by the Incident Commander.

This section also contains the following:

- FIGURE 3.1-2 provides information on accessing a Release/Spill Report Form. This form is utilized for initial and follow-up notifications. Follow-up notifications are the responsibility of the Liaison Officer.
- FIGURE 3.1-3 provides a notification summary and documentation form to assist in documenting notifications.

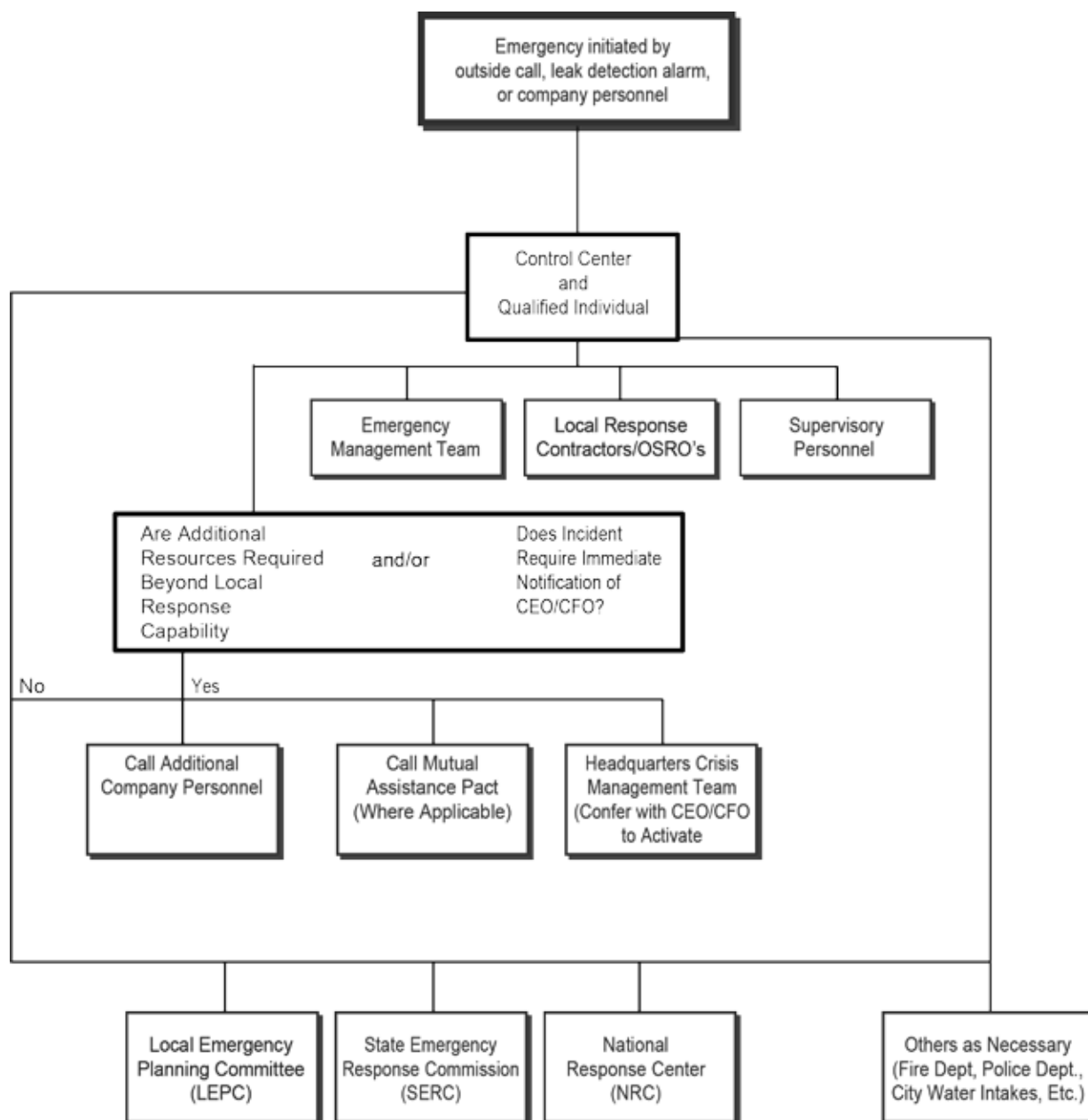
FIGURE 3.1-1-EMERGENCY NOTIFICATION FLOWCHART

FIGURE 3.1-1(a) - REPORTING CRITERIA FOR INCIDENTS/ WHEN TO CONSIDER ACTIVATING THE CRISIS MANAGEMENT PLAN

For incident criteria which requires immediate notification to SemGroup's Chief Executive Officer (CEO) and Chief Financial Officer (CFO) and which also requires consideration of whether or not to implement this Crisis Management Plan, consult the chart below.

SemGroup Corporation Incident Reporting Criteria

What this is:	This document lists the specific incidents that require immediate notification to the SemGroup Corporation CEO (or CFO if CEO is not reachable). All incidents requiring immediate notification should also be considered for activation of the Crisis Management Team. Norm Szydlowski, CEO – Office- 918.524.7758; Cell - 918.230.0651; Home - (b) (6) Bob Fitzgerald, CFO – Office- 918.524.7367; Cell - 918.237.5714; Home - (b) (6)
What this is not:	This document does not replace nor restrict any other internal or external company reporting requirements. Report all incidents to your management, who in turn will report upwardly as appropriate.

Incident Type	Immediate Notification – 24/7	As soon as practical in daylight hours
Injury/Illness	● Fatality - employee, contractor or third party ● Serious injuries or illnesses requiring hospitalization beyond 24 hours	● Any OSHA reportable injury/illness
Environmental	● Release of produced gas, natural gas, or LPG greater than 10 MMSCF ● Release of produced gas, natural gas, or LPG in any amount that present a fire/explosion hazard to populated area ● Petroleum or petroleum product spills greater than 50 Bbls to water ● Petroleum or petroleum product spills greater than 500 Bbls to land	● Petroleum or petroleum product spill greater than 1 Bbl
Fire and/or Explosion	● Any fire with potential for catastrophic release of highly hazardous or flammable substance ● Cost greater than \$500,000 including physical damage, loss of product or production, and incident response	● Any fire incident related to company property
Media	● Any incident that attracts widespread media coverage	● Any incident that attracts media coverage

FIGURE 3.1-1(a) - REPORTING CRITERIA FOR INCIDENTS/ WHEN TO CONSIDER ACTIVATING THE CRISIS MANAGEMENT PLAN, CONTINUED

SemGroup Corporation Incident Reporting Criteria, Continued

Incident Type	Immediate Notification – 24/7	As soon as practical in daylight hours
Motor Vehicle and Equipment	- Any incident resulting in fatality – employee, third party or contractor - Serious injuries or illnesses resulting in hospitalization greater than 24 hours	Any motor vehicle or equipment accident
Violent Criminal Incidents	- Homicide - Extortion - Kidnapping - Sexual assault - Major theft greater than \$100,000 - Armed robbery - Bomb threat	
Community	- Major off-site, third-party property damage greater than \$100,000 - Evacuation - Major road closure - Disruption of basic services to multiple parties - Shelter in place	Any incidents affecting the community
Emergency Shutdown	Business loss greater than \$100,000	All other emergency shutdowns
Agency Notifications/Fines		- Any notifications to agencies of noncompliance - Any fines from agencies for noncompliance

When considering whether or not a particular situation warrants implementing this Crisis Management Plan, some items to consider include the following:

- Does the field organization need additional resources to adequately respond to the incident?
- Could activation of this plan alleviate some of the responsibilities for the field organization so they can employ all their resources to containing and mitigating the incident?
- Is the incident being covered by the media?
- Is the incident causing a negative impact on the surrounding community?
- Is there potential for litigation as a result of the incident?

If the answer is “yes” to any of these questions, serious consideration should be given to activating the Crisis Management Team.

FIGURE 3.1-2- ACCIDENT REPORT- HAZARDOUS LIQUID PIPELINE SYSTEMS

The Hazardous Liquid Pipeline Systems Accident Report, form PHMSA F 7000-1, and instructions can be accessed at <http://www.phmsa.dot.gov/pipeline/library/forms>

FIGURE 3.1-3 - NOTIFICATIONS AND TELEPHONE NUMBERS

*24 Hour Number

FACILITY RESPONSE TEAM		
NAME/TITLE	PHONE NUMBER	RESPONSE TIME (hours)
Hugh Barry Area Supervisor – Platteville, CO Qualified Individual	(303) 536-4745 (Office) (b) (6) (303) 217-3460 *(Mobile)	2 - 4
David Minielly Vice President - Operations Qualified Individual	(405) 945-6310 (Office) (b) (6) (405) 618-7773 *(Mobile)	2 - 8
Norm Terry Maint Tech - Platteville, CO Qualified Individual	(720) 281-3260*(Mobile)	2 - 4
Larry Garber Maint Tech– Platteville, CO	(303) 536-4745 (Office) (303) 709-5665*(Mobile)	2 - 4
Raul Delgadillo Mechanic-Platteville, CO	(303) 453-9424*(Mobile)	2 - 4
Tony Nelson Maint. Tech-Platteville, CO	(720)281-3260(Mobile)	2 - 4
Matt Patterson Maint.Tech- Platteville CO	(303) 317-7327	2 - 4

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

FIGURE 3.1-3 - NOTIFICATIONS AND TELEPHONE NUMBERS, CONTINUED

*24 Hour Number

EMERGENCY RESPONSE PERSONNEL						
NAME/TITLE	PHONE NUMBER	RESPONSE TIME (hours)	RESPONSIBILITY DURING RESPONSE ACTION	RESPONSE TRAINING TYPE ¹		
				1	2	3
Hugh Barry Area Supervisor – Platteville, CO Qualified Individual	(303) 536-4745 (Office) (b) (6) (303) 217-3460 *(Mobile)	2 - 4	Operations	x		x
David Minielly Vice President - Operations Qualified Individual	(405) 945-6310 (Office) (b) (6) (405) 618-7773 *(Mobile)	2 - 8	Operations	x		x
EHS Specialist	(Office) *(Mobile)			x		x
Edith Coen Dir. EHS	(918) 524-7143 (Office) (918) 640-3384 *(Mobile)	2 - 10	DOT Compliance / Liaison	x		
Lance King Environmental Manager	(800) 522-3883* (Office) (405) 692-5115 (Office) (b) (6) (405) 317-9587 *(Mobile)	2 - 10	Environmental	x		
Pete Schwiering President Qualified Individual	(405) 945-6304 (Office) (b) (6) (405) 760-1134 *(Mobile)	2 - 10				
Alan Dye ROW & Claims	(405) 954-6320 (Office) (b) (6) (918) 625-1760 *(Mobile)	2 - 10	ROW / Damage	x		
Liz Barclay PR	(918) 524-8158 (Office) (b) (6) (918) 640-7673 *(Mobile)	2 - 10				
EMERGENCY RESPONSE TRAINING TYPE ¹						
There are three different types of training described below including HAZWOPER, OPA, and Qualified Individual/Incident Command Training. An "x" has been placed in the applicable columns (type 1, 2, or 3) in the table above for the type of training completed by each individual.						
TYPE	DESCRIPTION					
1	29 CFR 1910.120 HAZWOPER					
2	OPA (Training Reference for Oil Spill Response) All Facility Personnel, IMT, QI Components					
3	Qualified Individual/Incident Command Training					

FIGURE 3.1-3 - NOTIFICATIONS AND TELEPHONE NUMBERS, CONTINUED

***24 Hour Number**

AFFILIATION	PHONE NUMBER
Initial	
National Response Center (NRC)	(800) 424-8802* (202) 267-2675*
Recommended	
Federal Agencies	
U. S. Department of Transportation Pipeline and Hazardous Materials Safety Administration	Central Region (816) 329-3800 Western Region (720) 963-3160
U. S. EPA Region VII 11201 Renner BLVD Lenexa, KS 66219	(800) 223-0425 (913) 551-7003 (913) 281-0991*
U. S. Fish and Wildlife Service	(303) 236-4216 (Denver, CO) (785) 539-3474 (Manhattan, KS)
U.S. EPA Region VIII 1595 Wynkoop Street Denver, CO 80202-1129	(303) 312-6312 (800) 227-8917 (303) 293-1788*
State Agencies - Colorado	
Colorado Emergency Planning Commission	(303) 692-3020*
Colorado Environmental Release and Incident Reporting Line	(877) 518-5608*
Colorado Highway Patrol	(303) 239-4501*
County Agencies - Colorado	
Adams County	
Arvada Fire Protection District	(303) 424-3012
Aurora Fire Department	(303) 627-3130*
Greater Brighton Fire Protection District	(303) 288-1535*
Westminster Fire Department	911* (303) 658-4360*
Centura Health / St. Anthony Hospital Systems	(303) 426-2151*
Adams County Sheriff's Office	(303) 288-1535*
Adams County Office of Emergency Management	(720) 523-6600 Text (877) 301-4997*

FIGURE 3.1-3 - NOTIFICATIONS AND TELEPHONE NUMBERS, CONTINUED

*24 Hour Number

AFFILIATION	PHONE NUMBER
Recommended , Continued	
County Agencies - Colorado	
Kit Carson County	
Kit Carson County Ambulance Service	(719) 346-7878
Kit Carson Volunteer Fire Department	(719) 346-9325*
Kit Carson County Memorial Hospital	(719) 346-5311
Kit Carson County Sheriff and Emergency Dispatch Center	(719) 346-9325*
Kit Carson County Emergency Management Office	(719) 440-4589*
Morgan County	
Morgan County Ambulance Service	(970) 542-3570
Brush, Colorado Volunteer Fire and Brush Rural Fire Department	911* (970) 867-8531*
City of Fort Morgan Fire Department	(970) 867-2815
East Morgan County Hospital	(970) 842-6200
Morgan County Sheriff's Office	(970) 542-3445 (970) 867-2461*
Morgan County Office of Emergency Management	(970) 867-8506
Washington County	
Washington County Ambulance Service	(970) 345-2672
Washington County Fire Districts Last Chance Fire Station	911* (970) 386-2200
Sterling Regional Medical Center	(970) 522-0122
Washington County Sheriff	(970) 345-2244
Washington County Office of Emergency Management	Main (970) 345-2701 Direct (970) 554-2008
Weld County	
Weld County Paramedic Services	(970) 353-5700
Union County Fire/Rescue Authority	(970) 350-9500 911*
North Colorado Medical Center	(970) 352-4121
Weld County Sheriff	(970) 356-4015
La Salle Fire Department	(970) 284-6336

FIGURE 3.1-3 - NOTIFICATIONS AND TELEPHONE NUMBERS, CONTINUED

*24 Hour Number

AFFILIATION	PHONE NUMBER
State Agencies - Kansas	
Kansas Department of Health and Environment	(785) 296-1679* (785) 296-0614 (Evenings and Weekends)
Kansas Department of Health and Environment Kansas Corporation Commission	(785) 271-3100
Kansas Department of Health and Environment Kansas Division of Emergency Management (KDEM)	(785) 296-3176
Kansas Department of Health and Environment Northwest District 2301 East 13th Street Hays, KS 67601-2651	(785) 625-5663
Kansas Department of Health and Environment South Central District 130 South Market, 6th Floor Wichita, KS 67202-3802	(316) 337-6020
Kansas Department of Health and Environment Southwest District 302 West McArtor Road Dodge City, KS 67801-6098	(620) 225-0596
Kansas Department of Transportation Sedgwick County	(316) 744-1271
Kansas Turnpike Authority	(620) 326-5662 ext. 0 Emergency (620) 326-5662 ext. 1
University of Kansas Medical Center (KUMC), Poison Control	(800) 332-6633 FAX (800) 248-0074
County Agencies - Kansas	
Sherman County	
Goodland Fire Department	911* (785) 890-4545
Goodland Regional Medical Center	(785) 890-6002
Sherman County Sheriff	(785) 890-4835
Emergency Management	Cell (785) 332-8522 Office (785) 890-4883
Wallace County	
City of Sharon Springs Sheriff Department for Ambulance and Fire	(785) 852-4232*
Greeley County Hospital	(620) 376-4221
Wallace County Family Practice	(785) 852-4230
Wallace County Sheriff's Office	(785) 852-4288
Emergency Preparedness	(785) 852-4288

FIGURE 3.1-3 - NOTIFICATIONS AND TELEPHONE NUMBERS, CONTINUED

*24 Hour Number test

AFFILIATION	PHONE NUMBER
USCG Classified OSRO's	
Acme Products Company, Inc. Tulsa , OK	(918) 836-7184*
Service Providers	
Ace Construction Corp. - Towanda, KS	(316) 536-2202
Cheyenne Tank Service – Utica, KS	(785) 391-2237
Environmental Restoration (Subcontracted by ACME)	(888) 814-7477
Hawkeye Helicopter	(785) 229-7707
Haz-Mat Response (Subcontracted by ACME)	(800) 229-5252
HLH Construction & Environmental - Drumright, OK	Office (918) 352-2763 Cell (405) 747-6236*
Hogoboom Oilfield Trucking - El Dorado, KS	(316) 321-1397*
Justin's Backhoe Service - Madison, KS	(620) 437-6009*
Northern Colorado Constructors, Inc.	(303) 857-1754
Veolia Special Services (Subcontracted by ACME)	(918) 835-7908
Transport Companies	
Emergency Call Center - Union Pacific	(888) 877-7267
Waste Management	
Waste Connection Oklahoma City, OK	(405) 833-0269
Wildlife Rehabilitation	
Countryside Veterinary (Great Bend)	620) 792-2551
Greenwood Wildlife Rehabilitation Sanctuary Longmont, Colorado/Lyons, Colorado	(303) 545-5849

FIGURE 3.1-4 - REPORTING REQUIREMENTS

AGENCY / ADDRESS	REPORTING REQUIREMENT
National Response Center (NRC) c/o United States Coast Guard (CG-5335) - Stop 7581 Washington, D.C. 20593-0001 1-800-424-8802*	Spills to navigable waters or adjoining shorelines of any amount. Navigable waters include all waters that are used in interstate or foreign commerce, all interstate waters including wetlands, and all intrastate waters, such as lakes, rivers, streams, wetlands, sloughs, prairie potholes, wet meadows, playa lakes, or natural ponds. Essentially, the term 'navigable waters' refers to any <i>natural</i> surface water in the US (note: a drainage type ditch that is normally dry but may contain runoff during periods of inclement weather would not be considered a navigable waterway under 33 CFR subpart 2.05-25(a))
U.S. Dept. of Transportation - Information Resources Manager Office of Pipeline Safety Research and Special Programs Administration 400 Seventh Street Southwest, Room 2103 Washington, D.C. 20590-0001 1-800-424-8802* 1-202-373-2428	WRITTEN REPORT In addition to the reporting of accidents to the NRC, a written accident report (PHMSA Form 7000-1, provided in Appendix K) must be submitted for releases resulting in any of the following: 1. Explosion or fire not intentionally set by the operator. 2. Release of five gallons or more of hazardous liquid or carbon dioxide, except that no report is required for a release of less than five barrels resulting from a pipeline maintenance activity if the release is: a. not one described under the NRC's reporting conditions. b. confined to company property or pipeline right-of-way; and c. cleaned up promptly. 3. Death of any person. 4. Personal injury necessitating hospitalization. 5. Estimated property damage, including cost of cleanup and recovery, value of lost product, and damage to the property of the operator or others, or both, exceeding \$50,000. Written reports are required to be submitted as soon as practicable but no later than 30 days after discovery of the accident on DOT Form 7000-1. Reports shall be filed by the DOT Compliance Specialist. Changes or additions to the original report (PHMSA Form 7000-1) must be filed as a supplemental report within 30 days TELEPHONIC REPORT The spill shall be reported within 1 hour if the spill results in an event that requires written reporting and: 1. Caused a death or a person injury requiring hospitalization 2. Resulted in either a fire or explosion not intentionally set by the operator 3. Caused estimated property damage, including cost of cleanup and recover, value of lost product, and damage to the property of the operator or others, or both, exceeding \$50,000; 4. Required reporting to the NRC as outlined above or, 5. In the judgment of the operator was significant even though it did not meet the criteria of any other paragraph of this section.
Colorado Department of Public Health and Environment ,	Spills and incidents that have or may result in a spill along a highway must be reported to the nearest law enforcement agency immediately. The Colorado State Patrol and CDPHE must also be notified as soon as possible. Regulated Storage Tanks Owners and operators of regulated storage tank systems must report a release or suspected release of regulated substances to the Division of Oil and Public Safety at the Colorado Department of Labor and Employment within 24 hours. Pipelines This also includes spills from pipelines. Under this program, the reportable quantity for petroleum releases is 25 gallons or more, or any amount that causes a sheen on nearby surface water. Spills of less than 25 gallons of petroleum must be immediately contained and cleaned up. If cleanup cannot be accomplished within 24 hours, the Division of Oil and Public Safety must be notified immediately. (877) 518-5608

Kansas Department of Health and Environment	Kansas-K.A.R. 28-48-2 you must report all spills that impact the soils or waters of the state to KDHE (785) 296-1679
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SECTION 4 RESPONSE TEAM ORGANIZATION

Last revised: January 2005

4.1 Description

4.2 Activation Procedures

4.3 Team Member Response Times

4.4 Incident Management System / Unified Command

4.5 Qualified Individual (QI)

Figure 4.5-1 - Incident Management Team (IMT) Activation Procedure

Figure 4.5-2 - Incident Management Team (IMT) Organization Chart

4.6 Incident Management Team (IMT) Job Descriptions and Guidelines

4.1 DESCRIPTION

The Incident Management Team (IMT) has been created and organized to plan for and manage emergencies. The IMT is composed of Company personnel from offices within the Area. Additional personnel from outlying offices as well as contract personnel can be used (if needed). The IMT will develop strategies and priorities for a response, then will supervise contractors, handle safety and security matters, and will provide logistical support for contractor personnel. The IMT will handle all communications with the media and the public. Job descriptions for each IMT member are provided in SECTION 4.6. The IMT will train by participating in exercises as noted in APPENDIX A.

4.2 ACTIVATION PROCEDURES

Activation of the IMT may be accomplished in stages. Initially, the First Responder assumes the role of Incident Commander (IC). During a spill incident, the initial IC may be able to respond without assistance from the IMT. If the situation requires more resources, he may request additional personnel or management support from the IMT. This request is made to the Qualified Individual (QI). Depending on the situation, the QI may then assume the role of Incident Commander. The QI would then call out the other IMT members. The IMT activation procedure is provided in FIGURE 4.5-1.

4.3 TEAM MEMBER RESPONSE TIMES

See FIGURE 3.1-3 for each team member's response time "EPA Facilities only".

4.4 INCIDENT MANAGEMENT SYSTEM / UNIFIED COMMAND

The Incident Management System (IMS) will be used by the Company IMT for spill response. The IMT organization chart is provided in FIGURE 4.5-2. The organization can be expanded or contracted as necessary.

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

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

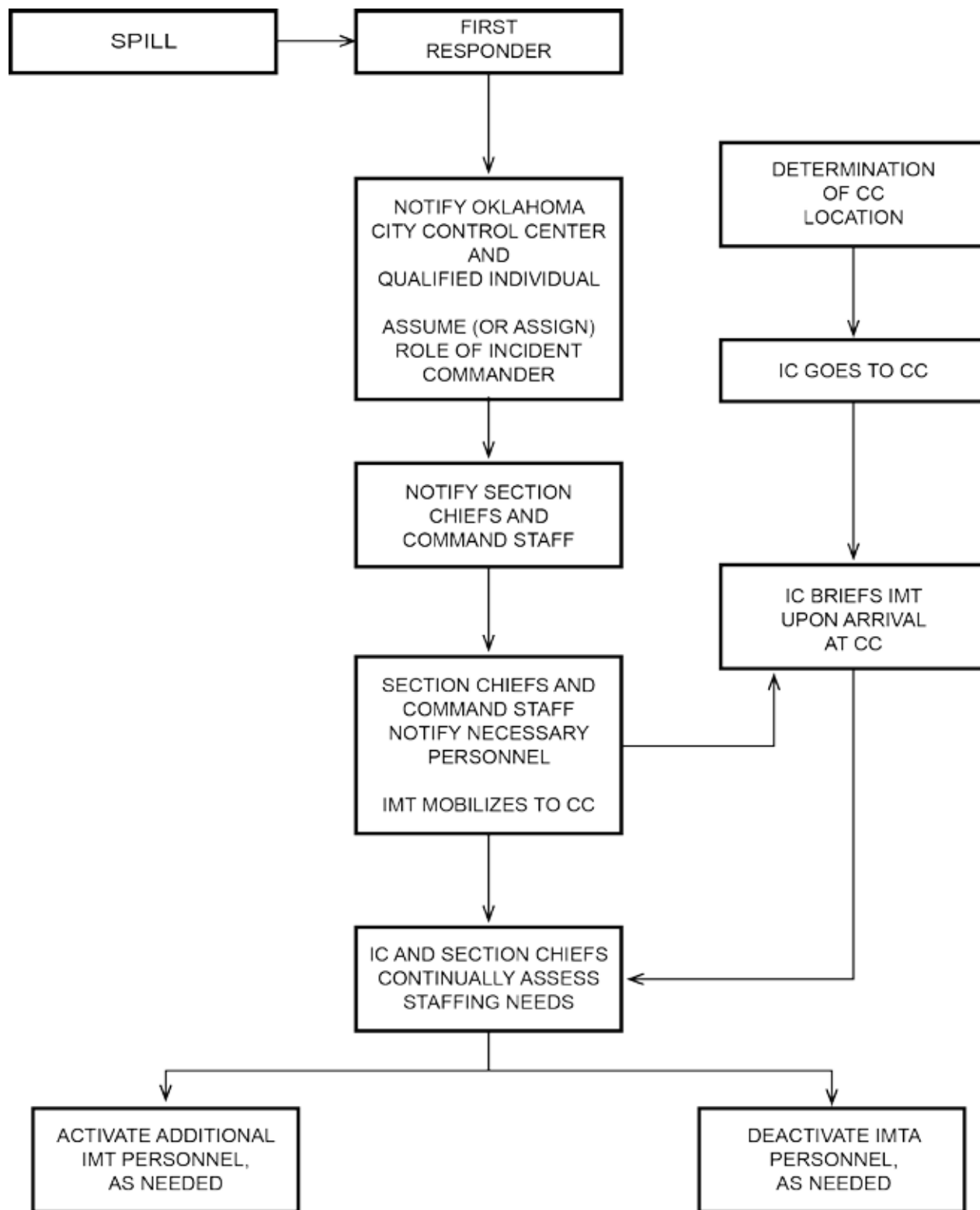
These three people share decision-making authority within the Incident Management System and are each responsible for coordinating other federal, state, and company personnel to form an effective integrated Incident Management Team. Refer to SECTION 4.6 for detailed checklists of the IMT roles and responsibilities as well as organizational interfaces with external parties.

4.5 QUALIFIED INDIVIDUAL (QI)

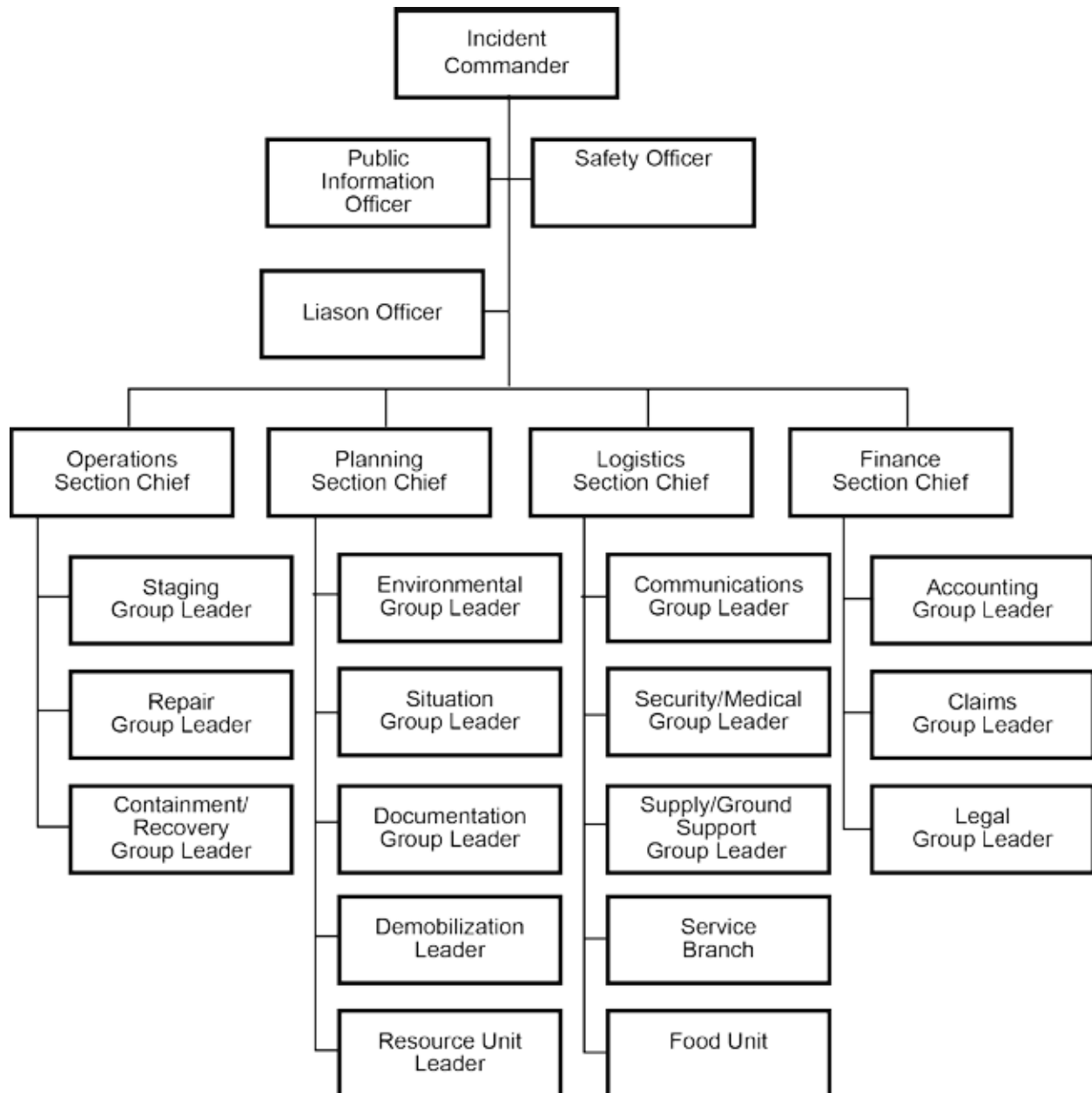
The Qualified Individual (QI) is an English-speaking representative, available on a 24-hour basis, and trained in the responsibilities outlined in this section. The QI has the following responsibilities and authorities as required by the Oil Pollution Act of 1990 (OPA 90):

- Activate internal alarm and hazard communication systems to notify all appropriate personnel
- Notify all response personnel and contractors (as needed)
- Identify the 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
- Assess and implement prompt removal actions
- Coordinate rescue and response actions
- Access company funds to initiate clean-up activities
- Direct cleanup activities until properly relieved of the responsibility or the incident is terminated

For further information on Qualified Individual's training, refer to APPENDIX A. Phone numbers for Qualified Individuals are provided in FIGURES 1-3 and 3.1-3.

FIGURE 4.5-1-INCIDENT MANAGEMENT TEAM (IMT) ACTIVATION PROCEDURE

CC - COMMAND CENTER
 IC - INCIDENT COMMANDER
 IMT - INCIDENT MANAGEMENT TEAM
 QI - QUALIFIED INDIVIDUAL

FIGURE 4.5-2 -INCIDENT MANAGEMENT TEAM (IMT) ORGANIZATION CHART

4.6 INCIDENT MANAGEMENT TEAM (IMT) JOB DESCRIPTIONS AND GUIDELINES

The following job descriptions and guidelines are intended to be used as a tool to assist IMT members in their particular positions within the Incident Management System (IMS).

- Incident Commander
- Public Information Officer
- Liaison Officer
- Safety Officer
- Operations Section Chief
- Staging Group Leader
- Repair Group Leader
- Containment Group Leader
- Planning Section Chief
- Environmental Group Leader
- Situation Group Leader
- Documentation Group Leader
- Demobilization Leader
- Resources Unit Leader
- Logistics Section Chief
- Communications Group Leader
- Security/Medical Group Leader
- Supply/Ground Support Group Leader
- Service Branch
- Food Unit
- Finance Section Chief
- Accounting Group Leader
- Claims Group Leader
- Legal Group Leader

INCIDENT COMMANDER

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

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

As soon as possible but not later than one (1) week following an incident, the Incident Commander shall conduct a critique of the response and follow-up of action items. Participants shall include Operations Control personnel, Company supervisors, and employees and outside agencies involved in the response. An Incident Debriefing Form is provided in SECTION 8.3.

Responsibilities:

- ☐ Maintain Activity Log.
- ☐ Establish Incident Command/Unified Command Post.
- ☐ Activate necessary section(s) of the Incident Management System (IMS) to deal with the emergency. Fill out the appropriate section(s) of the Incident Command organization chart and post it at the Incident Command Center.
- ☐ Develop goals and objectives for response.
- ☐ Work with Safety Officer and Planning Section Chief to develop a Site Safety Plan (SSP).
- ☐ Approve, authorize, and distribute Incident Action Plan (IAP) and SSP.
- ☐ Conduct planning meetings and briefings with the section chiefs.
- ☐ As Qualified Individual coordinate actions with Federal On-Scene Coordinator (FOSC) and State On-Scene Coordinator (SOSC).
- ☐ In a multi-jurisdictional response, ensure that all agencies are represented in the IMS.
- ☐ Coordinate and approve media information releases with the FOSC, SOSC, and Public Information Officer (PIO).
- ☐ Keep management informed of developments and progress.
- ☐ Authorize demobilization of resources as they are no longer needed.
- ☐ Complete Standard Incident Debriefing Form (FIGURE 8.3-1).

PUBLIC INFORMATION OFFICER

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

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

Responsibilities:

- Maintain Activity Log.
- Obtain briefing from IC.
- Participate in all planning meetings and briefings.
- Obtain outside information that may be useful to incident planning.
- Develop goals and objectives regarding public information.
- Arrange for necessary workspace, materials, telephones and staffing for Public Information Center (PIC).
- Establish a PIC, ensuring all appropriate agencies participate.
- Provide a single point of media contact for the IC.
- Coordinate media access to the response site as approved by the IC.
- Obtain approval for release of information from the IC.
- Arrange for meetings between media and emergency responders.
- Maintain list of all media present.
- Participate in Post-Incident Review (SECTION 8.3)

LIAISON OFFICER

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

Responsibilities:

- Maintain Activity Log.
- Obtain briefing from Incident Commander (IC).
- Participate in planning meetings and briefings.
- Identify and maintain communications link with agency representatives, assisting, and coordinating agencies.
- Identify current or potential inter-organizational issues and advise IC as appropriate.
- Coordinate with Legal Group Leader and Public Information Officer (PIO) regarding information and documents released to government agencies.
- Participate in Post-Incident Review (SECTION 8.3).

SAFETY OFFICER

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

Responsibilities:

- Maintain Activity Log.
- Obtain briefing from Incident Commander (IC).
- Develop, implement, and disseminate SSP with IC and section chiefs.
- Participate in planning meetings and briefings.
- Establish safety staff if necessary.
- Identify emergency contact numbers. Fill out emergency contact chart and post in the Incident Command Center.
- Conduct safety briefings with all emergency responders.
- Investigate accidents that have occurred during emergency response.
- Ensure proper hazard zones are established.
- Ensure all emergency responders have appropriate level of training.
- Ensure proper Personal Protective Equipment (PPE) is available and used.
- Advise Security/Medical Group Leader concerning PPE requirements.
- Ensure emergency alarms/warning systems are in place as needed.
- Participate in Post-Incident Review (SECTION 8.3).

OPERATIONS SECTION CHIEF

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

Responsibilities:

- Maintain Activity Log.
- Obtain briefing from Incident Commander (IC).
- Participate in Incident Command planning meetings and briefings.
- Conduct planning meetings and briefings for Operations Section.
- Develop operations portion of IAP.
- Supervise the implementation of the IAP.
- Make or approve expedient changes to the IAP.
- Request resources needed to implement IAP.
- Approve list of resources to be released.
- Ensure safe tactical operations.
- Establish a staging area for personnel and equipment.
- Confirm first responder actions.
- Confirm the completion of rescue/evacuation and administering of first aid.
- Confirm site perimeters have been established.
- Coordinate activities of public safety responders, contractors, and mutual assistance organizations.
- Participate in Post-Incident Review (SECTION 8.3).

STAGING GROUP LEADER

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

Responsibilities:

- ☐ Maintain Activity Log.
- ☐ Obtain briefing from Operations Section Chief.
- ☐ Participate in Operations' planning meetings and briefings.
- ☐ Advise Operations Section Chief of equipment location and operational status.
- ☐ Periodically advise Operations Section Chief on inventory status of consumable items (sorber pads, sorber boom, etc.).
- ☐ Coordinate with Logistics Section Chief regarding inbound equipment, personnel, and supplies.
- ☐ Participate in development of Operations' portion of Incident Action Plan (IAP).
- ☐ Establish check-in function and inventory control as appropriate.
- ☐ Allocate personnel/equipment to site(s) as requested.
- ☐ Establish and maintain boundaries of staging area(s).
- ☐ Demobilize/relocate staging area as needed.
- ☐ Post signs for identification and traffic control.
- ☐ Participate in Post-Incident Review (SECTION 8.3)

REPAIR GROUP LEADER

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

Responsibilities:

- ☐ Maintain Activity Log.
- ☐ Obtain briefing from Operations Section Chief.
- ☐ Periodically advise Operations Section Chief on status of restoration activities.
- ☐ Conduct frequent hazard assessments and coordinate safety needs with Operations Section Chief and Safety Officer.
- ☐ Participate in Operations' planning meetings and briefings.
- ☐ Participate in development of Operations' portion of Incident Action Plan (IAP).
- ☐ Conduct facility restoration activities in accordance with Company procedures, Site Safety Plan (SSP) and IAP.
- ☐ Determine and request additional materials, equipment and personnel as needed.
- ☐ Ensure all equipment is decontaminated prior to being released.
- ☐ Participate in Post-Incident Review (SECTION 8.3).

CONTAINMENT GROUP LEADER

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

Responsibilities:

- Maintain Activity Log.
- Obtain briefing from Operations Section Chief.
- Participate in Operations' planning meetings and briefings.
- Participate in development of Operations' portion of Incident Action Plan (IAP).
- Conduct activities in accordance with the IAP.
- Assess overall situation for containment and recovery needs and supervise group activities.
- Periodically advise the Operations Section Chief on the status of containment and recovery actions.
- Ensure hazard zones are established and maintained.
- Ensure adequate communication equipment for the containment group response.
- Determine and request additional resources as needed.
- Participate in Post-Incident Review (SECTION 8.3).

PLANNING SECTION CHIEF

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

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

Responsibilities:

- Maintain Activity Log.
- Obtain briefing from the IC.
- Establish and maintain communication with IC and other Section Chiefs.
- Advise IC on any significant changes of incident status.
- Conduct planning meetings and briefings for Planning section.
- Coordinate and provide input to the preparation of the Incident Action Plan (IAP).
- Participate in Incident Command planning meetings and briefings.
- In a multi-jurisdictional response, ensure that all agencies are represented in the Planning Section.
- Coordinate future needs for the emergency response.
- Determine response personnel needs.
- Determine personnel needs and request personnel for Planning section.
- Assign technical specialists (archaeologists, historians, biologists, etc.) where needed.
- Collect and analyze information on the situation.
- Assemble information on alternative response and cleanup strategies.
- Ensure situation status unit has a current organization chart of the Incident Command Organization.
- Provide periodic spill movement/migration prediction.
- Participate in Post Incident Review (SECTION 8.3).

ENVIRONMENTAL GROUP LEADER

The Environmental Group Leader is responsible for ensuring that all areas impacted by the release are identified and cleaned up following company and regulatory standards. The Environmental Group Leader supports Planning and Operations to minimize and document the environmental impact of the release. The Environmental Group Leader must plan for future site considerations such as long-term remediation and alternative response strategies in unusually sensitive areas. In a Unified Command Structure (UCS), representatives from the federal and state responding agencies will be included in this group.

Responsibilities:

- ☐ Maintain Activity Log.
- ☐ Obtain briefing from the Planning Section Chief.
- ☐ Participate in Planning section meetings and briefings.
- ☐ Participate in development of Planning's portion of Incident Action Plan (IAP).
- ☐ Coordinate environmental activities with responding regulatory agencies.
- ☐ Periodically advise the Planning Section Chief on status of group activities.
- ☐ Request additional personnel/specialists to support response effort.
- ☐ Determine environmental group resource needs.
- ☐ Identify and develop a prioritized list of natural, cultural and economic (NCE) resources at risk.
- ☐ Initiate and coordinate Natural Resources Damage Assessment (NRDA) activities.
- ☐ Develop a management plan for recovered contaminated media and ensure coordination with Containment Group Leader.
- ☐ Ensure proper management of injured/oiled wildlife.
- ☐ Determine alternative cleanup strategies for response.
- ☐ Participate in Post-Incident Review (SECTION 8.3).

SITUATION GROUP LEADER

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

Responsibilities:

- ☐ Maintain Activity Log.
- ☐ Obtain briefing from the Planning Section Chief.
- ☐ Participate in Planning section meetings and briefings.
- ☐ Participate in development of Planning's portion of Incident Action Plan (IAP).
- ☐ Maintain a master list of response resources ordered, in staging and in use.
- ☐ Collect and display current status of requested response resources.
- ☐ Collect and display current status of resources, current spill location, personnel and weather.
- ☐ Analyze current information to determine spill trajectory and potential impacts.
- ☐ Disseminate information concerning the situation status upon request from the emergency responders.
- ☐ Provide photographic services and maps.
- ☐ Establish periodic reconnaissance of impacted area to support information needs.
- ☐ Collect information on the status of the implementation of Incident Action Plans. Display this information in the Incident Command Center.
- ☐ Participate in Post Incident Review (SECTION 8.3).

DOCUMENTATION GROUP LEADER

The Documentation Group Leader is responsible for the maintenance of accurate, up-to-date incident files. Examples of the incident documentation include: Incident Action Plan, incident reports, communications logs, injury claims, situation status reports, etc. Thorough documentation is critical to post incident analysis. Some of these documents may originate in other sections. This unit should ensure each section is maintaining and providing appropriate documents. Incident files will be stored for legal, analytical, and historical purposes. The Documentation Unit also provides duplication and copying services.

Responsibilities:

- Review Common Responsibilities.
- Review Unit Leader Responsibilities.
- Obtain briefing and special instructions from Planning Section Chief.
- Participate in Planning Meetings as required.
- Establish and organize incident files.
- Establish duplication service and respond to requests.
- File copies of all official forms and reports.
- Check on accuracy and completeness of records submitted for files and correct errors or omissions by contacting appropriate ICS units.
- Provide incident documentation to appropriate requesters.

DEMOBILIZATION LEADER

Responsibilities:

- Reviews incident resource records to determine size of demobilization effort and evaluate logistics and transportation capabilities required to support demobilization.
- Prepares and obtain approval of Demobilization Plan. In cooperation with the logistics section, provide plans for the orderly decontamination of excess and surplus equipment. Distribute Demobilization Plan to each processing point.
- Monitors implementation and assist in coordinating the Demobilization Plan. Provide for the orderly demobilization of response resources as soon as they become surplus.
- Obtains briefing and special instructions from Planning Section Chief and participate in planning meetings as required.
- Provides status reports to appropriate requesters.
- Ensures the Demobilization Check-Out form (ICS 221) is prepared and completed forms are returned for filing.
- Maintain Unit's Records and Unit/Activity Log (ICS 214) or (ICS 214a).

RESOURCE UNIT LEADER

Responsibilities:

- Maintains the status of all primary and support resources at an incident by developing and maintaining a master list of all resources, including check-in, status, current location, etc.
- Using the Incident Briefing (ICS 201) prepares and maintains the Incident Situation Display.
- Establishes contact with incident facilities to track resource status.
- Gathers, posts, and maintains incident resource status and provides status reports upon request.
- Maintains master roster of all resources checked in at the incident.
- Prepares Organizational Assignment List (ICS 203) including appropriate parts of Assignment Lists (ICS 204, ICS 204a) and Organizational Chart (ICS 207).
- Obtains briefing and special instructions from Planning Section Chief and participate in planning meetings as required.
- Maintain Unit's Records and Unit/Activity Log (ICS 214) or (ICS 214a).

LOGISTICS SECTION CHIEF

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

Responsibilities:

- Maintain Activity Log.
- Obtain briefing from the Incident Commander (IC).
- Participate in Incident Command planning meetings and briefings.
- Conduct planning meetings and briefings for Logistics section.
- Participate in the preparation of the Incident Action Plan (IAP).
- Identify service and support requirements for planned operations.
- Identify sources of supply for identified and potential needs.
- Advise IC on current service and support requirements.
- Procure needed materials, equipment and services from sources by means consistent with the timing requirements of the IAP and Operations.
- Ensure all purchases are documented.
- Participate in Post-Incident Review (SECTION 8.3).

COMMUNICATIONS GROUP LEADER

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

Responsibilities:

- Maintain Activity Log.
- Obtain briefing from Logistics Section Chief.
- Periodically advise Logistics Section Chief on status of communications group.
- Participate in Logistics section planning meetings and briefings.
- Participate in development of Logistics' portion of Incident Action Plan (IAP).
- Establish an Incident Command communications center.
- Ensure Incident Commander (IC) has communications compatible with other response agencies.
- Identify all communications circuits/equipment used by emergency responders and keep a chart updated with this information.
- Determine the type and amount of communications required to support the response effort (computer, radio, telephone, fax, etc.).
- Ensure timely establishment of adequate communications equipment and systems.
- Advise Logistics Section Chief on communications capabilities/limitations.
- Establish an equipment inventory control system for communications gear.
- Ensure all equipment is tested and repaired.
- Participate in Post-Incident Review (SECTION 8.3).

SECURITY/MEDICAL GROUP LEADER

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

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

Responsibilities:

- Maintain Activity Log.
- Obtain briefing from Logistics Section Chief.
- Periodically advise Logistics Section Chief on the status of security and medical problems.
- Participate in Logistics meetings and briefings.
- Participate in development of Logistics' portion of Incident Action Plan (IAP).
- Determine and develop security/medical support plan needs.
- Request medical or security personnel, as needed.
- Work with Safety Officer to identify/coordinate local emergency medical services.
- Coordinate with Safety Officer and Operations Section Chief to establish the Site Safety Plan (SSP) with site boundaries, hazard zones, escape routes, staging areas, command Center and Personal Protective Equipment (PPE) requirements.
- Coordinate/develop an identification system in order to control access to the incident site.
- Participate in Post Incident Review (SECTION 8.3).

SUPPLY/GROUND SUPPORT GROUP LEADER

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

Responsibilities:

- ☐ Maintain Activity Log.
- ☐ Obtain briefing from Logistics Section Chief.
- ☐ Periodically advise Logistics Section Chief on status of supply/ground support group.
- ☐ Participate in Logistics meetings and briefings.
- ☐ Participate in development of Logistics' portion of Incident Action Plan (IAP).
- ☐ Communicate with Staging Group Leader concerning material, equipment and personnel that are inbound and the approximate time of arrival.
- ☐ Coordinate with other Section Chiefs to ascertain the priority of needed materials, equipment and services.
- ☐ Coordinate with Finance Section Chief to establish accounts, purchase orders, AFEs and procedures as necessary.
- ☐ Establish an inventory control system for materials and equipment.
- ☐ Maintain roads, when necessary.
- ☐ Participate in Post-Incident Review (SECTION 8.3).

SERVICE BRANCH

The Service Branch, when activated, is under the supervision of the Logistics Section Chief, and is responsible for the management of all service activities at the incident. The Branch supervises the operations of the Communications, Medical, and Food Units.

Responsibilities:

- ☐ Review Common Responsibilities.
- ☐ Obtain working materials form Logistics Kit.
- ☐ Determine level of service required to support operations.
- ☐ Confirm dispatch of Branch personnel.
- ☐ Participate in planning meeting of Logistics Section Personnel.
- ☐ Review Incident Action Plan.
- ☐ Coordinate activities of Service Branch Units.
- ☐ Inform Logistics Section Chief of activities.
- ☐ Resolve Service Branch problems.
- ☐ Maintain Unit/Activity Log (ICS 214, SECTION 5.2).

FOOD UNIT

Responsibilities:

- Provide and coordinate meals and subsistence support to response personnel.
- Plan, document and account for the number of meals required.
- Establish kitchens, galleys, canteens, and other food service support.
- Establish and manage sources of supply to support meals and subsistence requirements.
- Provide potable drinking water, coolers, and other beverages required to support response operations.
- Identify resources and support needs.
- Develop the Incident Meal/feeding Plan (ICS 215b).
- Maintain Unit's Records and Unit/Activity Log (ICS 214) or (ICS 214a).

FINANCE SECTION CHIEF

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

Responsibilities:

- Maintain Activity Log.
- Obtain briefing from Incident Commander (IC).
- Participate in Incident Command planning meetings and briefings.
- Conduct planning meetings and briefings for Finance section.
- Participate in preparation of the Incident Action Plan (IAP).
- Participate in planning meetings.
- Participate in Unified Command System (UCS) as incident warrants.
- Request assistance of corporate accounting, legal, right-of-way or risk management as needed.
- Assist with contracting administration.
- Participate in Post-Incident Review (SECTION 8.3).

ACCOUNTING GROUP LEADER

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

Responsibilities:

- Maintain Activity Log.
- Obtain briefing from Finance Section Chief.
- Periodically advise Finance Section Chief.
- Participate in Finance planning meetings and briefings.
- Participate in development of Finance's portion of Incident Action Plan (IAP).
- Make recommendations for cost savings to Finance and Logistics Section Chiefs.
- Establish accounts as necessary to support the Logistics section.
- Ensure all invoices are documented, verified, and paid accordingly.
- Involve corporate accounting group for assistance as necessary.
- Participate in Post-Incident Review (SECTION 8.3).

CLAIMS GROUP LEADER

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

Responsibilities:

- Maintain Activity Log.
- Obtain briefing from Finance Section Chief.
- Participate in Finance planning meetings and briefings.
- Participate in development of Finance's portion of Incident Action Plan (IAP).
- Periodically inform affected parties of status of emergency response.
- Review and authorize payment of all claims.
- Provide needs of evacuated persons or groups.
- Purchase or acquire property.
- Inform and update necessary insurance groups and underwriters.
- Involve corporate Risk Management or Land, Records, and Claims as needed.
- Participate in Post-Incident Review (SECTION 8.3).

LEGAL GROUP LEADER

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

Responsibilities:

- Maintain Activity Log.
- Obtain briefing from Finance Section Chief.
- Periodically advise Finance Section Chief of status.
- Participate in Finance planning meetings and briefings.
- Participate in development of Finance's portion of Incident Action Plan (IAP).
- Conduct investigations per Incident Commander's (IC) request.
- Provide skilled negotiators.
- Communicate to all affected emergency response personnel if work product is declared "Attorney-Client Privilege."
- Participate in Post-Incident Review (SECTION 8.3).

SECTION 5 INCIDENT PLANNING

Last revised: January 2005

5.1 Documentation Procedures

5.2 Incident Action Plan Process and Meetings

Figure 5.2-1 Operational Period Planning Cycle

5.2.1 Incident Occurs / Notifications

5.2.2 Initial Response and Assessment

5.2.3 Unified Command Objectives Meeting

5.2.4 Tactics Meeting

5.2.5 Planning Meeting

5.2.6 Incident Action Plan (IAP) Preparation and Approval

5.2.7 Operations Briefing

5.2.8 Assess Progress

5.2.9 Initial Unified Command Meeting

5.2.10 Command Staff Meeting

5.2.11 Command General Staff Breakfast / Supper

5.2.12 Business Management Meeting

5.2.13 Agency Representative Meeting

5.2.14 News Briefing

5.3 IMS Forms

5.3.1 Incident Briefing IMS 201-OS

5.3.2 Incident Action Plan (IAP) Cover Sheet

5.3.3 Incident Objectives IMS 202-OS

5.3.4 Organization Assignment List IMS 203-OS

5.3.5 Assignment List IMS 204-OS

5.3.6 Communications Plan IMS 205-OS

5.3.7 Medical Plan IMS 206-OS

5.3.8 Incident Status Summary IMS 209-OS

5.3.9 Unit Log IMS 214-OS

5.3.10 Individual Log IMS 214a-OS

5.4 Site Safety and Health Plan

5.5 Decontamination Plan

5.6 Disposal Plan

5.7 Incident Security Plan

5.8 Demobilization 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 cleanup 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

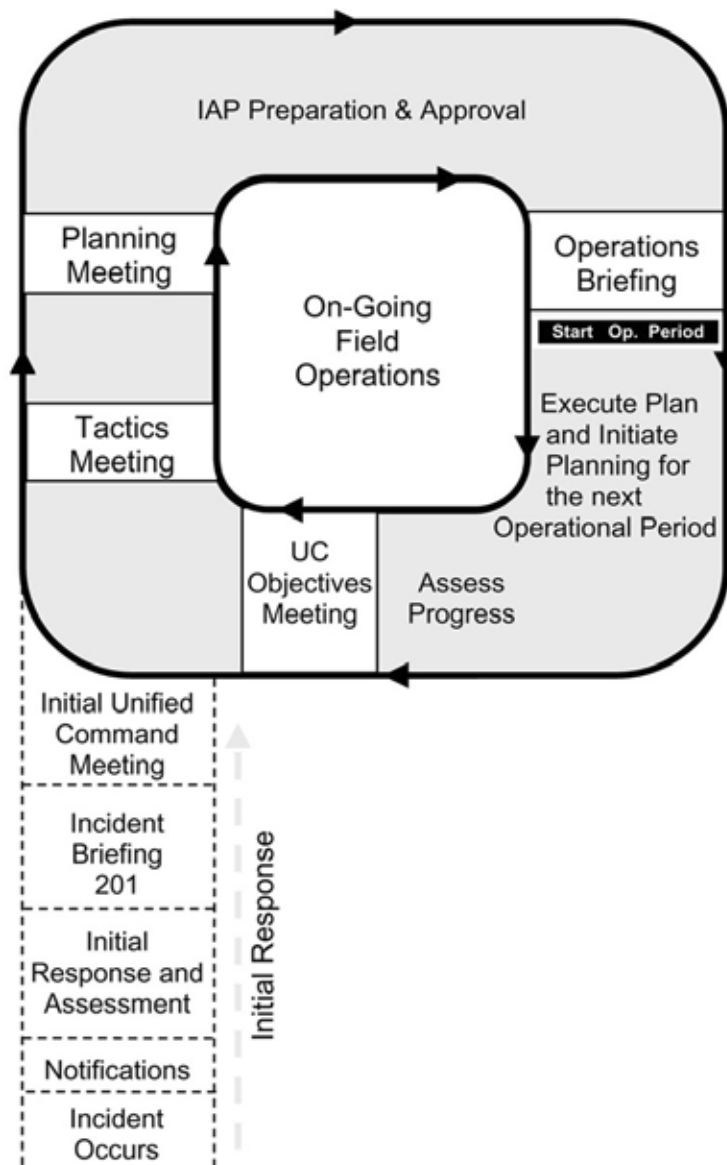
5.2 INCIDENT ACTION PLAN PROCESS AND MEETINGS

The period of INITIAL RESPONSE AND ASSESSMENT occurs in all incidents. Short-term responses (small in scope and/or duration, e.g., few resources working one operational period) can often be coordinated using only IMS 201 Briefings.

Longer-term, more complex responses, will likely require a dedicated Planning Section Chief (PSC) who must arrange for transition into the OPERATIONAL PERIOD PLANNING CYCLE. Certain meetings, briefings, and information-gathering during the Cycle lead to the Incident Action Plan (IAP) that guides operations of the next operational period. Only the meetings and events directly relevant to assembling the IAP are described. The IC/UC specifies the operational periods (e.g., 12 hour shifts, sunrise to sunset, 24 hour shifts etc.).

The SPECIAL PURPOSE meetings are most applicable to larger incidents requiring an OPERATIONAL PERIOD PLANNING CYCLE, but may have utility during INITIAL RESPONSE AND ASSESSMENT. The UNIFIED COMMAND MEETING and other special purpose meetings are briefly noted.

FIGURE 5.2-1 OPERATIONAL PERIOD PLANNING CYCLE



5.2.1 Incident Occurs / Notifications

When an incident occurs, notifications will be made to the appropriate Federal, State, and Local agencies and the initial assessment and response actions will begin.

5.2.2 Initial Response and Assessment

INCIDENT BRIEFING (IMS 201)

During the transfer of command process, an IMS 201 formatted briefing provides the incoming IC/UC with basic information regarding the incident situation and the resources allotted to the incident. Most importantly, it is the de facto Incident Action Plan (IAP) for the initial response and remains in force and continues to develop until the response ends or the Planning Section generates the incident's first IAP. It is also suitable for briefing individuals newly assigned to Command and General Staff, as well as needed assessment briefings for the staff.

When: New IC/UC; staff briefing, as required
 Briefer: Current IC/UC
 Attendees: Prospective IC/UC; Command, and General Staff, as required
 Agenda: Using IMS 201 as an outline, included:

1. Situation (note territory, exposures, safety concerns, etc.; use map/charts).
2. Objectives and priorities.
3. Strategies and tactics.
4. Current organization.
5. Resource assignments.
6. Resources enroute and/or ordered.
7. Facilities established.

OPERATIONAL PERIOD PLANNING CYCLE (Events most related to assembling IAP)

5.2.3 Unified Command Objectives Meeting

The IC/UC will review/identify and prioritize objectives for the next operational period for the IMS 202 form. Objectives from the previous operational period are reviewed and any new objectives are identified.

When: Prior to Tactics Meeting
 Facilitator: UC Member
 Attendees: UC Members; Command and General Staff, as appropriate
 Agenda:

1. Review/identify objectives for the next operational period (clearly stated and attainable with the resources available, yet flexible enough to allow Operations Section Chief to choose tactics).
2. Review any open agenda items from initial/previous meetings.

5.2.4 Tactics Meeting

This 30-45 minute meeting creates the blueprint for tactical deployment during the next operational period. In preparation for the Tactics Meeting, the Planning Section Chief and Operations Section Chief review the current IAP and situation status information, as provided through the Situation Unit, to assess work progress against IAP objectives. The Operations Section Chief/Planning Section Chief will jointly develop primary and alternate strategies to meet objectives for consideration at the next Planning Meeting.

When: Prior to Planning Meeting

Facilitator: Planning Section Chief

Attendees: Planning Section Chief, Operations Section Chief, Logistics Section Chief, Resources Unit Leader, Situation Unit Leader, and Environmental Unit Leader

Agenda:

1. Review the objectives for the next operational period.
2. Develop strategies (primary and alternative).
3. Prepare a draft of IMS 215 to identify resources that should be ordered through Logistics.

5.2.5 Planning Meeting

This meeting defines incident objectives, strategies, and tactics and identifies resource needs for the next operational period. Depending on incident complexity, this meeting should last no longer than 45 minutes. This meeting fine-tunes objectives and priorities, identifies and solves problems, and defines work assignments and responsibilities on a completed IMS Form 215 (Operations Planning Worksheet). Meeting preparations include conducting a Tactics Meeting. Displays in the meeting room should include Objectives (IMS 202) for the next period, large sketch maps or charts clearly dated and timed, poster-size Operational Planning Worksheet (IMS 215), current resource inventory prepared by Resources Unit, and current situation status displays prepared by Situation Unit. After the meeting, the IMS 215 is used by the Logistics Section Chief to prepare the off-incident tactical and logistical resource orders, and used by Planning Section Chief to develop IAP assignment lists.

When: After the Tactics Meeting

Facilitator: Planning Section Chief

Attendees: Determined by IC/UC, generally IC/UC, Command Staff, General Staff, Air Operations Section Chief, Resources Unit Leader, Situation Unit Leader, Environmental Unit Leader, and Technical Specialists, as required

Agenda: Primary Responsibility

5.2.5 Planning Meeting, Continued

1. State incident objectives and policy issues. IC/UC
2. Briefing of situation, critical and sensitive areas, weather/sea forecast, resource status/availability. Planning Section Chief w/Situation Unit Leader, Resources Unit Leader
3. State primary and alternative strategies to meet objectives. Operations Section Chief w/Planning Section Chief, Logistics Section Chief
4. Designate Branch, Division, Group boundaries and functions, as appropriate; use maps and IMS 215. Operations Section Chief
5. Specify tactics for each Division, note limitations. Operations Section Chief, Situation Unit Leader assist
6. Specify resources needed by Divisions/Groups. Operations Section Chief, w/Planning Section Chief, Logistics Section Chief
7. Specify operations facilities and reporting locations (plot on map). Operations Section Chief, Logistics Section Chief assist
8. Develop resources, support, and overhead order(s). Planning Section Chief, Logistics Section Chief
9. Consider support issues and agree on plans: communications, traffic, safety, medical, etc. Logistics Section Chief, Planning Section Chief assist
10. Assisting or cooperating agency and stakeholder group considerations regarding Incident Action Plan. Liaison Officer
11. Safety considerations regarding Incident Action Plan. Safety Officer
12. News media/public considerations regarding Incident Action Plan. Information Officer
13. Finalize, approve Incident Action Plan for next operational period. IC/UC

5.2.6 Incident Action Plan (IAP) Preparation and Approval

Immediately following the Planning Meeting, the attendees prepare their assignments for the IAP to meet the Planning Section Chief deadline for assembling the IAP components. The deadline will be early enough to permit timely IC/UC approval, and duplication of sufficient copies for the Operations Briefing and for overheads.

When: Immediately following Planning Meeting, Planning Section Chief assigns deadline
Facilitator: Planning Section Chief

Common Components:		Responsible to Prepare
1.	Incident Objectives (IMS 202)	[Resources Unit Leader]
2.	Organization List (IMS 203)	[Resources Unit Leader]
3.	Assignment List (IMS 204)	[Resources Unit Leader/Planning Section Chief]
4.	Communications Plan (IMS 205)	[Communications Unit Leader]
5.	Medical Plan (IMS 205)	[Medical Unit Leader]
6.	Incident Map	[Situation Unit Leader]

Optional Components (use as pertinent):

Optional Components (use as pertinent):		Responsible to Prepare
1.	Air Operations Summary (IMS 220)	[Air Operations Branch Director]
2.	Traffic Plan	[Ground Support Unit Leader]
3.	Demobilization Plan	[Demobilization Unit Leader]

5.2.7 Operations Briefing

This less-than-30-minute meeting conveys the IAP for the oncoming shift to the response organization. After this meeting, off-going field supervisors should be interviewed by their reliefs and by Operations Section Chief in order to further confirm or adjust the course of the new shift's IAP. Shifts in tactics may be made by the operations section supervisors. Similarly, a supervisor may reallocate resources within a division or group to adapt to changing conditions.

When: About an hour prior to each shift

Facilitator: Planning Section Chief

Attendees: IC/UC, Command Staff, General Staff, Branch Directors, Division/Group Supervisors, Task Force/Strike Team Leaders (if possible), Unit Leaders, others as appropriate

Agenda:		Responsible to Present
1.	Review of IC/UC Objectives, changes to IAP.	[Planning Section Chief]
2.	Current response actions and last shift's accomplishments.	[Operations Section Chief]
3.	Weather and sea conditions forecast.	[Situation Unit Leader]
4.	Division/Group and air operations assignment.	[Operations Section Chief]
5.	Trajectory analysis.	[Situation Unit Leader]
6.	Transport, communications, supply updates.	[Logistics Section Chief]
7.	Safety message.	[Safety Officer]
8.	Financial report.	[Finance/Administration Section Chief]
9.	News Media report.	[Information Officer]
10.	Assisting/cooperating organization/agency reports of concern.	[Liaison Officer]
11.	Incident Action Plan endorsement and motivational remarks.	[IC/UC]

5.2.8 Assess Progress

The Operations and Planning Sections will review the incident response progress and make recommendations to the IC/UC in preparation for reviewing/identifying objectives for the next operational period. This feedback/information is gathered from various sources, including Field Observers, responder debriefs, stakeholders, etc.

SPECIAL PURPOSE MEETINGS

5.2.9 Initial Unified Command Meeting

Provides UC officials with an opportunity to discuss and concur on important issues prior to joint incident action planning. The meeting should be brief, and important points documented. Prior to the meeting, parties should review and prepare to address the agenda items. Planning Meeting participants will use the results of this meeting to guide the response efforts.

5.2.9 Initial Unified Command Meeting, Continued

When: When UC is formed, prior to the first operational period Planning Meeting
 Facilitator: UC member
 Attendees: Only ICs who will comprise UC
 Agenda:

1. Identify jurisdictional priorities and objectives.
2. Present jurisdictional limitations, concerns, restrictions.
3. Develop collective set of incident objectives.
4. Establish and agree on acceptable priorities.
5. Adopt an overall strategy to accomplish objectives.
6. Agree on basic organizational structure and size.
7. Designate the best-qualified and acceptable Operations Section Chief.
8. Agree on General Staff personnel designations and planning, logistical, and finance agreements and procedures.
9. Agree on resource ordering procedures.
10. Agree on cost-sharing procedures.
11. Agree on informational matters.
12. Designate a Unified Command spokesperson.

5.2.10 Command Staff Meeting

Coordinate Command Staff functions, responsibilities and objectives. It is scheduled as necessary by the IC/UC. Command Staff (IC/UC, Safety Officer, Liaison Officer, Information Officer) attend.

5.2.11 Command and General Staff Breakfast / Supper

An opportunity for the Command (IC/UC, Safety Officer, Liaison Officer, Information Officer) and General Staff (Operations Section Chief, Planning Section Chief, Logistics Section Chief, Finance/Administration Section Chief) to gather under informal and relaxing conditions to share and update each other on developing issues.

5.2.12 Business Management Meeting

This under-30-minute meeting is for participants to develop and update the operating plan for finance and logistics support. The agenda could include: finance requirements and criteria imposed by contributing organizations, business operating plan for resource procurement and incident funding, cost analysis and financial summary data. Attendees include: Finance/Administration Section Chief, Cost Unit Leader, Logistics Section Chief, Supply Unit Leader, Demobilization Unit Leader. It is generally conducted before the PLANNING MEETING.

5.2.13 Agency Representative Meeting

To update agency representatives and ensure that they can support IAP. Conducted by Liaison Officer, attended by Agency Representatives. Most appropriately held after the PLANNING MEETING in order to announce plans for next operational period, yet allow for changes should the plan's expectations be unattainable by an agency.

5.2.14 News Briefing

To brief the news media and public on the most current and accurate incident facts. Set up by the Information Officer, moderated by an appropriate representative, and featuring selected spokespersons. Spokespersons should be prepared by the Information Officer to address anticipated issues. The briefing should be well planned, organized, and scheduled to meet the media's needs.

5.3 IMS FORMS

- INCIDENT BRIEFING FORM - IMS 201 (Initial Report Only)

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

- 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, Federal On-Scene Coordinator (FOSC), and State On-Scene Coordinator (SOSC).

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

- INCIDENT ACTION PLAN (IAP) COVER SHEET

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

- INCIDENT OBJECTIVES - IMS 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 - IMS 203

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

- ASSIGNMENT LIST - IMS 204

Submits assignments at the level of Division and Groups.

- COMMUNICATIONS PLAN - 205

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

- MEDICAL PLAN - IMS 206

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

5.3 IMS FORMS, CONTINUED

- INCIDENT STATUS SUMMARY - IMS 209

Used to inform personnel about the status of response efforts. It is not included in the IAP.

- UNIT LOG - IMS 214

Used to log activities for an entire unit.

- INDIVIDUAL LOG - IMS 214a

Used to log activities for an individual.

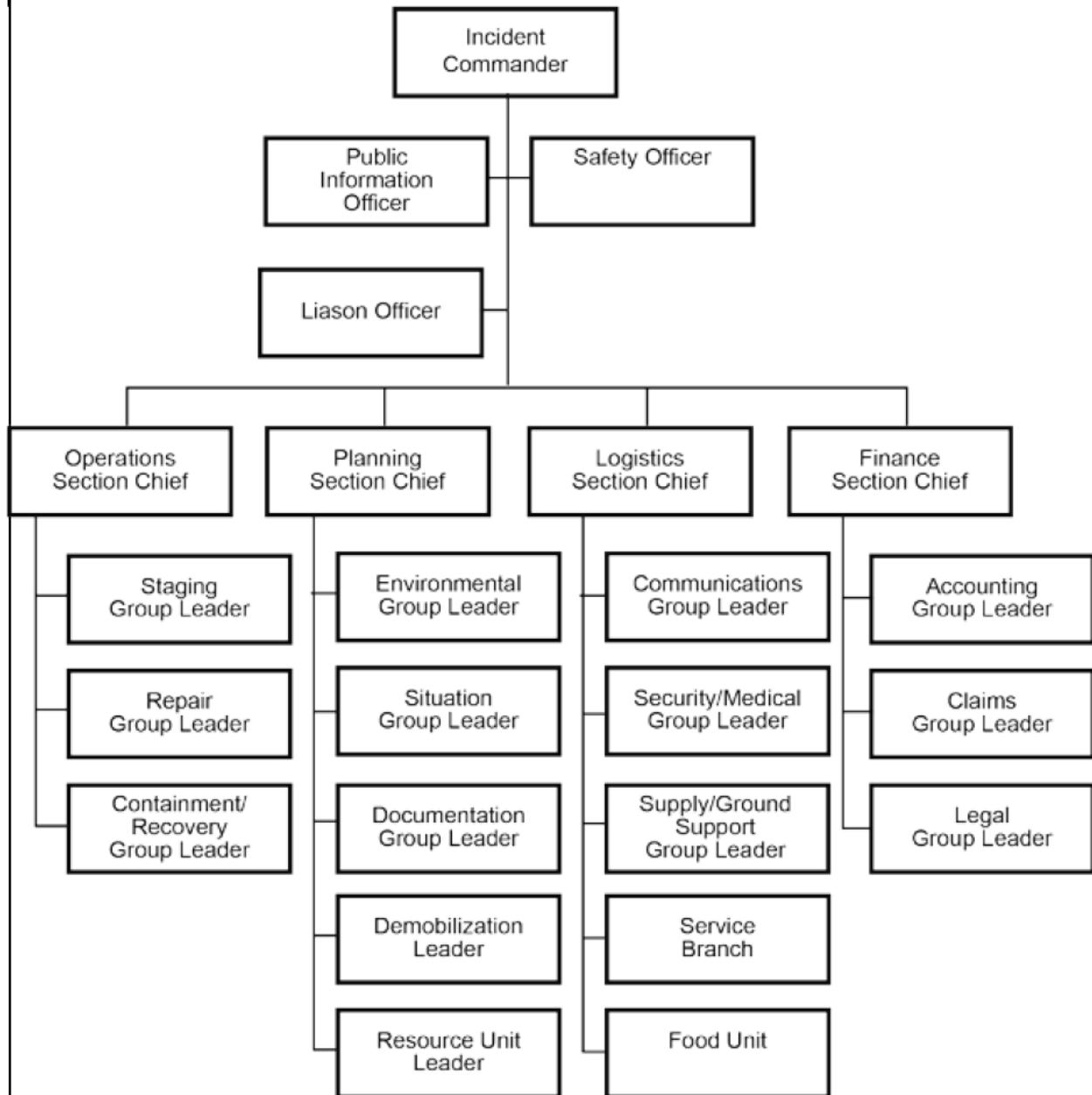
5.3.1 Incident Briefing IMS 201-OS, Continued

[illegible]

5.3.1 Incident Briefing IMS 201-0S, Continued

Inddon1Nom•	2.Prepared By:(name)	INCIDENT BRIEFING IMS 201-0S
	Date: Time:	
INCIDENT BRIEFING March, 2000		IMS 201-0S (pg 3 of4)

6. Current Organization



5.3.2 Incident Action Plan (IAP) Cover Sheet

1. Incident Name	2. Operational Period to be covered by IAP (Date/Time)		IAP COVER SHEET
	From:	To:	
3. Approved by:			
FOSC			
SOSC			
IC			
INCIDENT ACTION PLAN The items checked below are included in this Incident Action Plan: ☒ IMS 202-OS (Incident Objectives) ☒ IMS 203-OS (Organization Assignment List) ☒ IMS 204-OS (Assignment List) ☒ IMS 205-OS (Communications Plan) ☒ IMS 206-OS (Medical Plan) ☒ IMS 209-OS (Incident Status Summary) ☒ IMS 214-OS (Unit Log) ☒ IMS 214a-OS (Individual Log) ☐ ☐			
4. Prepared By: (Planning Section Chief)			Date/Time:
IAP COVER SHEET			March, 2000

5.3.3 Incident Objectives IMS 202-OS

1. Incident Name	2. Operational Period (Date/Time) From: To:	INCIDENT OBJECTIVES IMS 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 (IMS 203-OS)	☐ Assignment List (IMS 204-OS)	☐ Communications Plan (IMS 205-OS)
☒ Medical Plan (IMS 206-OS)	☐ Weather	
10. Prepared By: (Planning Section Chief)	Date/Time:	
INCIDENT OBJECTIVES	March, 2000	IMS 202-OS

5.3.4 Organization Assignment List IMS 203-OS

1. Incident Name		2. Operational Period (Date/Time)		ORGANIZATION ASSIGNMENT LIST IMS 203-OS																																																																																									
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ORGANIZATION ASSIGNMENT LIST		March, 2000		IMS 203-OS																																																																																									

5.3.5 Assignment List IMS 204-OS

1. Incident Name		2. Operational Period (Date/Time) From: _____ To: _____		ASSIGNMENT LIST IMS 204-OS	
3. Branch			4. Division/Group		
5. Operations Personnel	Name	Affiliation	Contact # (s)		
Operations Section Chief:					
Branch Director:					
Division/Croup Supervisor:					
6. Resources Assigned This Period	"X" indicates 204a attachment with special instructions				
Strike Team/Task Force/ Resource Identifier	Leader	Contact Info. #	# of Persons	Notes/Remarks	
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		June, 2000		IMS 204-OS	

5.3.7 Medical Plan IMS 206-OS

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

5.3.8 Incident Status Summary IMS 209-OS

1. Incident Name		2. Period Covered By Report		Time of Report		INCIDENT STATUS SUMMARY IMS 209-OS	
From:		To:					
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 ☐		Unsecured ☐		Public Injury			
Since Last Report		Total		8. Equipment Resources		[RUL]	
Volume Spilled				Description		Ordered	
Mass Balance/Oil Budget				Spill Resp. Vsls		Available / Staged	
Recovered Oil				Fishing Vessels		Assigned	
Evaporation				Tugs		Out of Service	
Natural Dispersion				Barges			
Chemical Dispersion				Other Vessels			
Burned				Skimmers			
Floating, Contained				Boom (ft.)			
Floating, Uncontained				Sbnt/Snr Bm. (ft.)			
Onshore				Vacuum Trucks			
Total Spilled Oil Accounted For:				Helicopters			
4. Waste Management (Estimated)		[OPS/Disposal]		Fixed Wing			
Recovered		Stored		5. Personnel Resources		[RUL]	
Oil (bbl)				Description		People in Cmd. Post	
Oily Liquids (bbl)				Federal		People in the Field	
Liquids (bbl)				State		Total People On Scene	
Oily Solids (tons)				Local			
Solids (tons)				RP			
5. Shoreline Impacts (Estimated, in miles)		[PSC/EUL/SSC]		Contract Personnel			
Degree of Oiling		Affected		Volunteers			
Light		Cleaned		Total Response Personnel From All Organizations:			
Medium		To Be Cleaned		10. Special Notes			
Heavy							
Total							
6. Wildlife Impacts		[OPS/Wildlife Br.]					
Numbers in () indicate subtotal that are threatened / endangered species.		Died in Facility					
Captured		Cleaned					
Released		DOA					
Euth.		Other					
Birds							
Mammals							
Reptiles							
Fish							
Total							
11. Prepared By (Situation Unit Leader)		Date/Time					
INCIDENT STATUS SUMMARY		March, 2000				IMS 209-OS	

5.3.9 Unit Log IMS 214-OS

UNIT LOG IMS 214-OS	
1. Incident Name	
2. Operational Period (Date / Time)	
From: To:	
3. Unit Name	
4. Unit Leader (Name and IMS Position)	
5. Personnel Assigned	
Name	IMS Position Home Base
6. Activity Log (Continue on Reverse)	
Time	Major events
7. Prepared by: Date / Time	
UNIT LOG	June 2000
IMS 214-OS	

5.3.9 Unit Log IMS 214-OS, Continued

[illegible]

5.3.10 Individual Log IMS 214a-OS

[illegible]

5.4 SITE SAFETY AND HEALTH PLAN

PLAN REVIEW:		
Incident Safety Officer:		
APPROVALS:		
Incident Commander:		
Operations Officer:		
Haz Mat Division Officer:		
PLAN PREPARED:	DATE:	TIME:
Incident Location:		
Incident Number:		
HAZARDOUS SITUATION:	(Known or suspected, contaminated media, type storage container, type occupancy, obvious leaks, spills or breaches, physical damage)	
RESPONDING AGENCIES:		
Agency:	Name:	
1.		
2.		
3.		
4.		
5.		
6.		
7.		
8.		
9.		
10.		

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

5.4 SITE SAFETY AND HEALTH PLAN, CONTINUED

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. As 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 four short blasts on an air horn every 30 seconds until all personnel are known to be evacuated.
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 accomplished 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.

5.4 SITE SAFETY AND HEALTH PLAN, CONTINUED

EMERGENCY ACTION CONDITIONS:

Code Green	All conditions are normal and incident work may continue.
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Code Red	All or specific work activities must cease at once due to one of the following: • Indications of emissions from the incident such as CGI readings of 25% or greater, less than 19.5% oxygen, or one Mr/Hr of ionizing radiation are present • Current or projected meteorological data indicates that a probable impact on working conditions could occur • If background readings obtained during cessation of activities worsen, reassessment of the findings should be confirmed; actions to lower levels of contaminant or contingencies for further incident monitoring must take place • If this condition exists, incident personnel will immediately notify command staff
----------	---

Officials making evacuation/public health decisions will address the need for a public health advisory to potentially affected areas. This is because incident control methods may or may not reduce the source of contamination or threat to the general public.

If needed, a temporary sheltering or evacuation plan should be considered until levels of contamination are reduced or contained to levels deemed safe by all responsible authorities. Confirmation of these levels will be done by generally approved monitoring methods agreed to by the authorities in charge.

Sheltering/Evacuation Plan:
Ordered By:

5.4 SITE SAFETY AND HEALTH PLAN, CONTINUED

LIST OF ACCESS AUTHORIZED PERSONNEL (Outside Agencies):				
SPECIALIZED TASK ASSIGNMENTS:				
LEVELS OF PROTECTION SELECTED:				
Initial Site Survey:	A	B	C	D
Entry Team:	A	B	C	D
Backup Team:	A	B	C	D
Decon Team:	A	B	C	D

Level A - To be selected when the greatest level of skin, respiratory, and eye protection is required.

Level B - The highest level of respiratory protection is necessary but a lesser level of skin protection is needed.

Level C - The concentration(s) and type(s) of airborne substance(s) is known and the criteria for using air purifying respirators are met.

Level D - A work uniform affording minimal protection: used for nuisance contamination only.

SKETCH OR ATTACH PLOT PLAN HERE:

5.4 SITE SAFETY AND HEALTH PLAN, CONTINUED

RESPONSE SAFETY CHECK-OFF SHEET

TYPE OF RESPONSE:	
Highway	Industrial
Railway	Marine
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: ☐ Yes ☐ No	
If no, justify:	
In the event of fire or explosion:	
In the event of potential or actual ionizing radiation exposure:	

5.4 SITE SAFETY AND HEALTH PLAN, CONTINUED

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)

5.4 SITE SAFETY AND HEALTH PLAN, CONTINUED

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:

Authorized By:

5.4 SITE SAFETY AND HEALTH PLAN, CONTINUED

POST RESPONSE:			
Level of protection used:			
A	B	C	D
Justify			
EQUIPMENT DECONTAMINATION:			
	Clothing	SCBA/Resp.	Monitoring
Disposed:			
Cleaned:			
No Action:			
Specify:			
TOTAL APPROXIMATE TIME IN HOT ZONE:		Days	Hours
DATE PREPARED:		PREPARED BY:	
Reviewed By:			
Assistance in preparing this safety plan can be obtained from Haz Mat personnel.			

5.4 SITE SAFETY AND HEALTH PLAN, CONTINUED

HEALTH AND SAFETY / RESPONSE PLAN

APPLIES TO SITE:			
DATE:			
PRODUCTS:		(ATTACH MSDS)	
SITE CHARACTERIZATION			
	☐ Marine vessel	☐ Pipeline	☐ Storage facility
	☐ Truck/Rail car	☐ Other	
Water	☐ Shoreline	☐ Wetlands	☐ Other
	☐ Rocky	☐ Sandy	☐ Muddy
	☐ River	☐ Creek	☐ Canal
Land	☐ Mountains	☐ Hills	☐ Brushland
	☐ Other	☐ Forest	☐ Ocean
Use	☐ Public	☐ Government	☐ Residential
	☐ Recreational	☐ Industrial	☐ Farmland
Weather	☐ Temp _____ °F	☐ Wind/Dir. _____ mph	☐ Rain
	☐ Snow	☐ Ice	☐ Other
Pathways for Dispersion	☐ Air	☐ Water	☐ Land
Site Hazards	☐ Chemical Hazards	☐ Boats	☐ Other
	☐ Slips, trips, falls	☐ Helicopters	
	☐ Heat stress	☐ Noise	
	☐ Cold stress	☐ Pumps, hoses	
	☐ Weather	☐ Steam, hot water	
	☐ Drowning	☐ Fire/Explosion	
	☐ Heavy equipment	☐ Poor visibility	
	☐ Drum handling	☐ Motor vehicles	
	☐ Wildlife/plants	☐ Confined spaces (see attachment/appendix)	
	☐ Hand/power tools	☐ Ionizing radiation	
Air Monitoring			
% LEL	% O ₂	PPM Benzene	PPM H ₂ S
☐ Other (specify)			
☐ 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

5.4 SITE SAFETY AND HEALTH PLAN, CONTINUED

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 Management System chart.):				
EMERGENCY PLAN (See site map and Daily Medical Plan - IMS 206.):				
SITE SECURITY:				
☐ Pre-entry briefing				
☐ Security level				
☐ Other topics				
Low Medium High				
DATE/TIME/PLAN COMPLETED:				
By:				

5.4 SITE SAFETY AND HEALTH PLAN, CONTINUED

SITE DIAGRAM



GENERAL DIAGRAM INSTRUCTIONS

1. Site Diagram should include the following (label the items drawn with corresponding letter):

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

5.5 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:

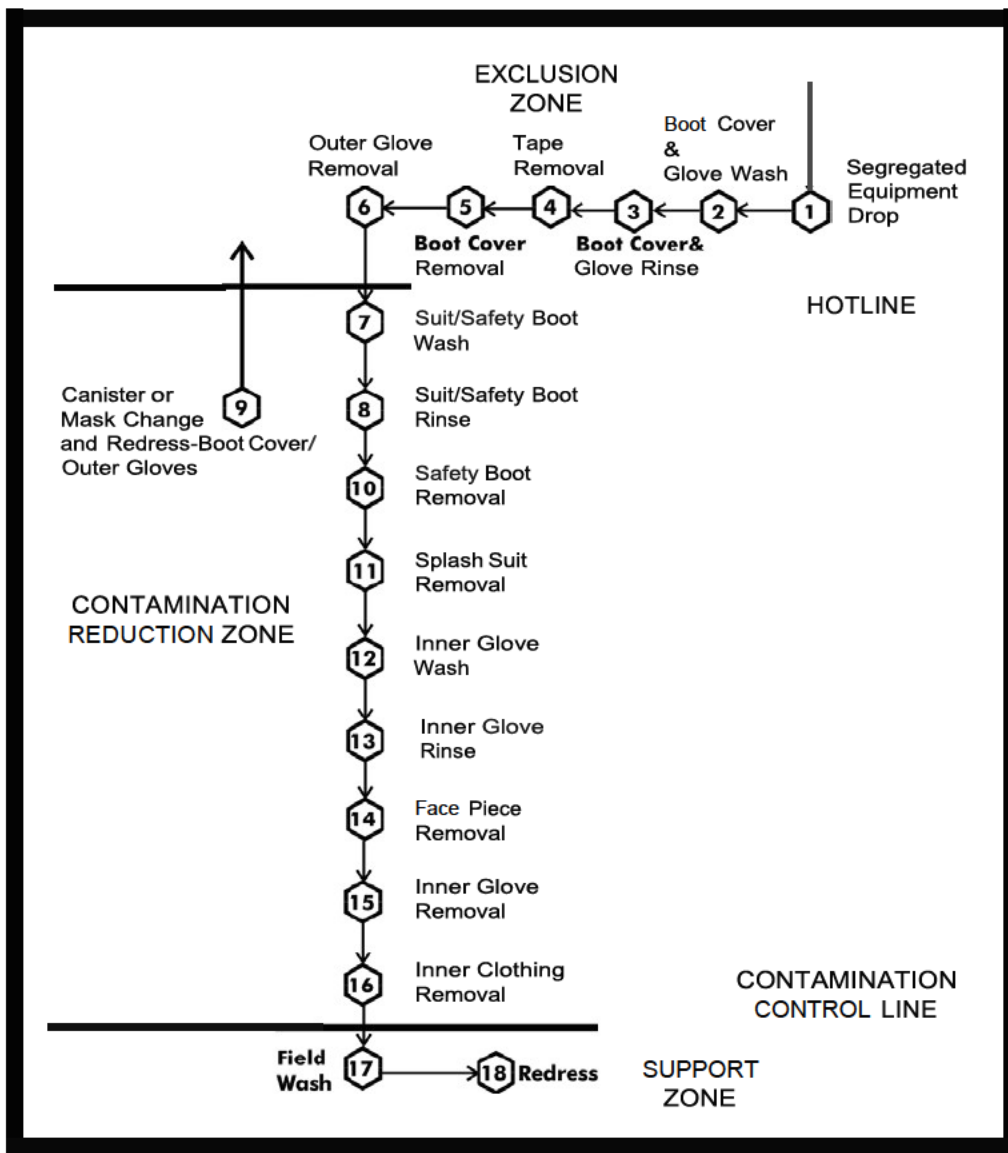
Decontamination is performed within the contamination reduction zone, which is appropriately lined to prevent the spread of contaminants. Dikes are installed under the lining to contain runoff.

5.5 DECONTAMINATION PLAN, CONTINUED

Procedures for these stations are as follows:

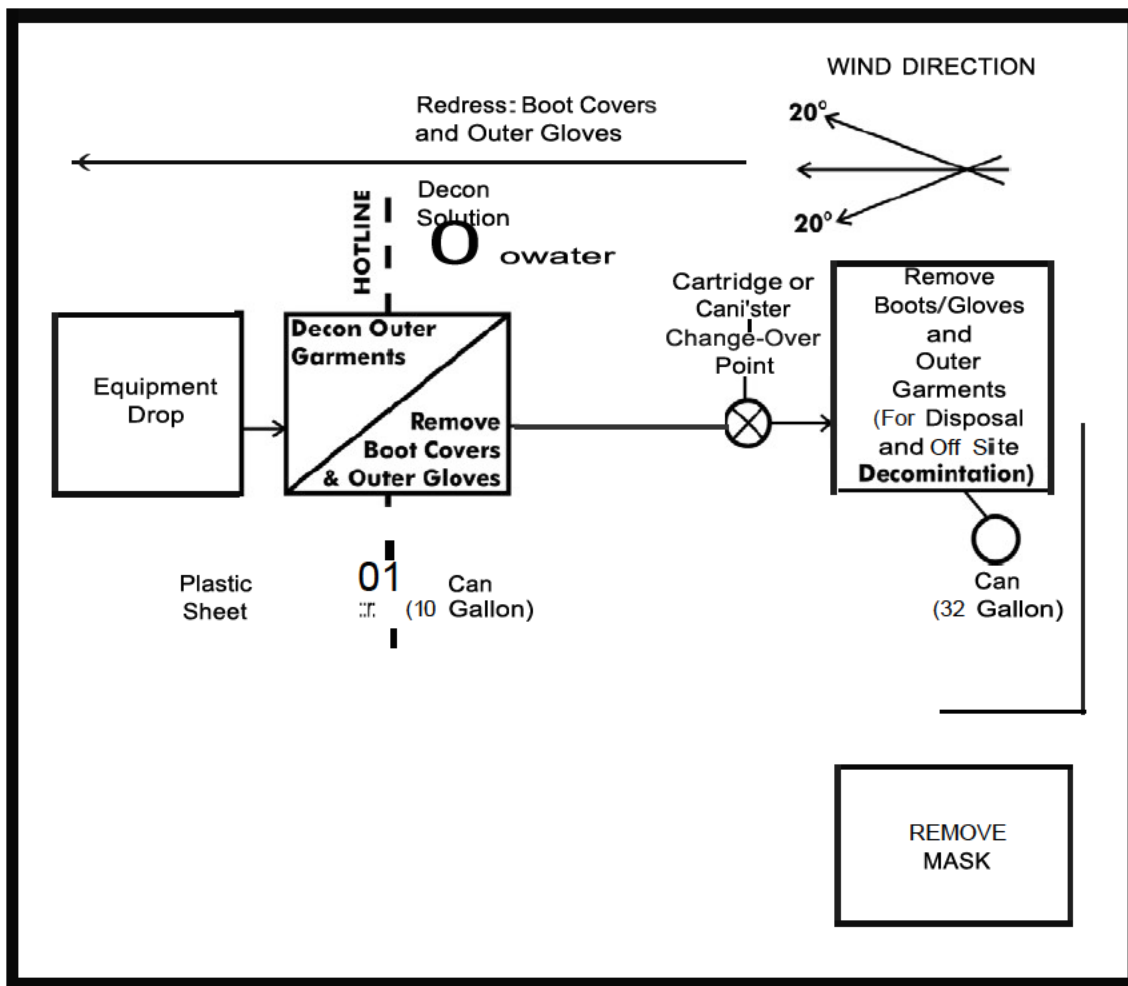
MAXIMUM MEASURES FOR DECONTAMINATION		
STATION 1	Segregated equipment drop	Deposit equipment used on site (tools, sampling devices and containers, monitoring instruments, radios, clipboards, etc.) on plastic drop cloths or in different containers with plastic liners. Segregation at the drop reduces the 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, 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.

DECONTAMINATION PROCEDURES, MAXIMUM DECONTAMINATION LAYOUT



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.

DECONTAMINATION PROCEDURES, MINIMUM DECONTAMINATION LAYOUT



5.6 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:	

5.6 DISPOSAL PLAN, CONTINUED

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:

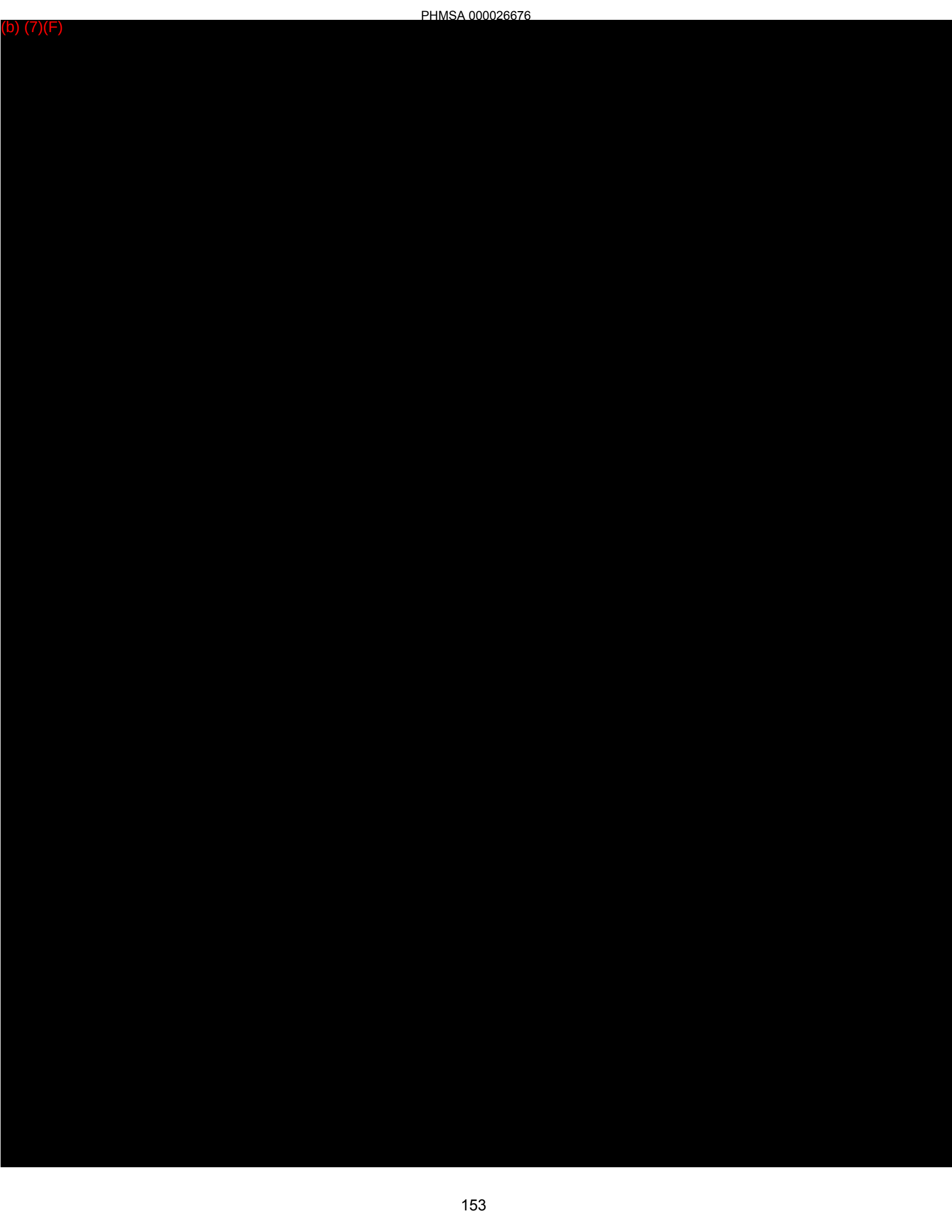
PPE required for waste handling:	
Waste coordinator:	Date:
Resources required for disposal options:	

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:	

5.6 DISPOSAL PLAN, CONTINUED

Additional information:
Waste coordinator:

(b) (7)(F)



(b) (7)(F)



5.8 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 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

SECTION 6 SENSITIVE AREAS / RESPONSE TACTICS

Last revised: August 28, 2013

6.1 Area Description

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 Wildlife Protection and Rehabilitation

6.5 Endangered and Threatened Species By State

6.6 Pipeline Map Feature Index

6.7 Pipeline Sensitivity Maps

6.8 Tactical Plan Index

6.9 Tactical Plans

6.1 AREA DESCRIPTION

Description of shoreline types and specific shoreline protection and clean-up techniques are presented in FIGURE 6.2-1 and FIGURE 6.3-2. The strategies and response examples are guidelines and must be evaluated during the response to ensure that the selected response methods are appropriate for the situation.

Sensitivity maps are provided in SECTION 6.7.

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 breakout 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. A summary of booming techniques is provided below.

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	- 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	- 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	- May require high pressure spraying: - To remove oil - To prepare substrate for recolonization of barnacle and oyster communities - For aesthetic reasons
Freshwater Flat	- 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 - They are often areas of heavy bird use	- 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 years	- 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 because of the likelihood of mixing oil deeper into the sediments during the cleanup effort - Passive efforts, such as sorbent boom can be used to retain oil as it is naturally removed
Fresh Marsh	- 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	- 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	- Marshes require the highest priority for shoreline protection - Natural recovery is recommended when: - 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	- 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: scrubs, shrubs, evergreen trees, and hardwood forested woodlands - Birds and mammals use swamps during feeding and breeding activities	- 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 adhere to swamp vegetation - 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	- 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 released) may be effective under close scientific supervision - 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

FIGURE 6.2-1 - RESPONSE TACTICS FOR VARIOUS SHORELINES, CONTINUED

TYPES	DESCRIPTION	PREDICTED OIL IMPACT	RECOMMENDED CLEANUP ACTIVITY
Open water	- Have ocean like waves and currents - Weather changes effect on-water conditions - River mouths present problems - Thermal stratification occurs	- 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	- 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	- May have varying salinities, meandering channels, and high flow rates - May include manmade structures (such as dams and locks) - Water levels vary seasonally - Floods generate high suspended sediment and debris loads	- 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 contaminated, oil may persist for years	- 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 recovery, physical herding, sorbents, and debris/vegetation removal
Small lakes and ponds	- 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	- Wildlife and socioeconomic areas likely to be impacted - Wind will control the oil's distribution	- 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	- 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	- 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	- 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

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 pipeline are provided in SECTION 6.7.

FIGURE 6.3-1 - SENSITIVE AREA PROTECTION IMPLEMENT SEQUENCE

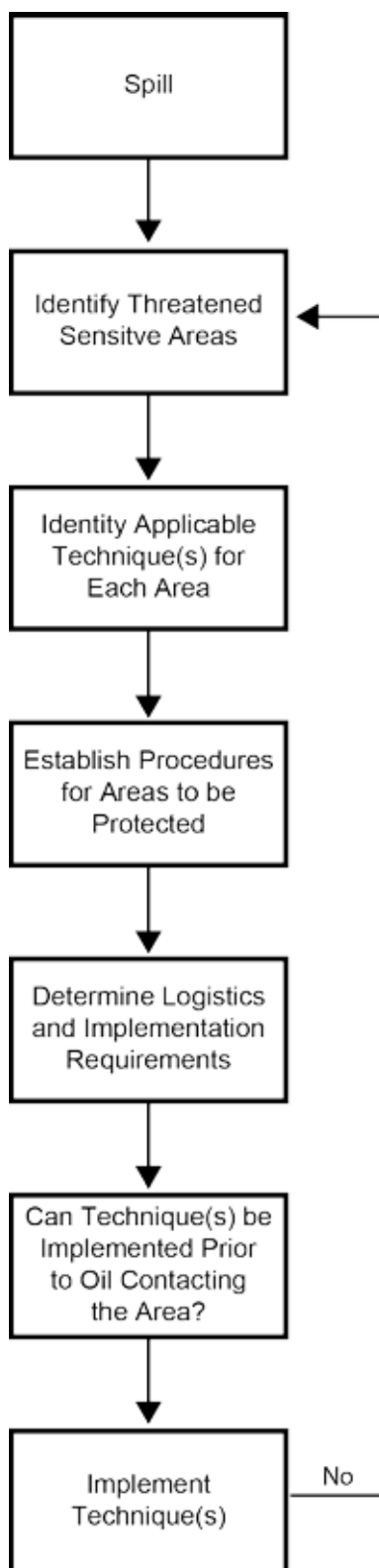


FIGURE 6.3-2 - SUMMARY OF SHORELINE AND TERRESTRIAL CLEANUP TECHNIQUES

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	- 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	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	- On land, wherever surface sediments are accessible to heavy equipment - Large amounts of oiled materials	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	- 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	- 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	- Can be used on all habitat types - Stranded oil on the substrate - Shoreline access points	- 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	- 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	- 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	- Substrates, riprap, and solid man-made structures - Oil stranded onshore - Floating oil on shallow intertidal areas	- 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	- 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	- 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 sorbent materials are anchored at the waterline adjacent to heavily oiled areas to contain and recover oil as it leaches from the sediments.	<u>Equipment</u> 1,000-2,000 ft. sorbent/snare boom 200-400 stakes or anchor systems <u>Personnel</u> 4-10 workers	- All shoreline types - Calm wave action - Slow removal process	Significant amounts of oil 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	- 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	- Significant amounts of oil can remain on the shoreline for extended periods of time - Disturbs surface sediments and organisms

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 of oil.	<u>Equipment</u> 1-2 fertilizer applicators 1 tilling device if required <u>Personnel</u> 2-4 workers	Any shoreline habitat type where nutrients are deficient Moderate to heavily oiled substrates After other techniques have been used to remove free product on lightly oiled shorelines Where other techniques are destructive or ineffective	- Significant amounts of oil can remain on the shoreline for extended periods of time - Can disturb surface 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	- 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	- 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	- 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 do more harm than natural removal	- Oil may persist for significant periods of time - Remobilized oil or sheens may impact other areas - Higher probability of impacting wildlife
13. Dispersants (use of dispersants requires Federal or State approval)	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	- 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	- 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.)

6.4 WILDLIFE PROTECTION AND REHABILITATION

- 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 are included in FIGURE 3.1-3
- 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.
- U.S Fish & Wildlife is to be notified and consulted in establishing incident-specific priorities for the protection of the resources provided.

6.5 ENDANGERED AND THREATENED SPECIES BY STATE

COMMON NAME	SCIENTIFIC NAME	HABITAT	STATUS	STATE
Beardtongue, Penland	<i>Penstemon penlandii</i>	Alkaline clays containing selenium, which is toxic to most plants	E	Colorado
Butterfly, Uncompahgre fritillary	<i>Boloria acrocynema</i>	Moist alpine slopes with extensive snow willow	E	Colorado
Cactus, Knowlton	<i>Pediocactus knowltonii</i>	Gravelly, dark, sandy loams on slopes or hills	E	Colorado
Chub, bonytail entire	<i>Gila elegans</i>	Main stream of mid-sized to large rivers	E	Colorado
Chub, humpback entire	<i>Gila cypha</i>	Large rivers	E	Colorado
Crane, whooping except where EXPN	<i>Grus americana</i>	Cropland/hedgerow, grassland/herbaceous	E	Colorado
Ferret, black-footed entire population, except where EXPN	<i>Mustela nigripes</i>	Grasslands, steppe, and shrub steppe	E	Colorado
Flycatcher, southwestern willow	<i>Empidonax traillii extimus</i>	Streamside thickets, brushy fields, and willows	E	Colorado
Milk-vetch, Mancos	<i>Astragalus humillimus</i>	Sandstone ledges or mesa tops	E	Colorado
Phacelia, North Park	<i>Phacelia formosula</i>	Barren, raw exposures of the Coalmont Formation, a rusty-colored sandy substrate	E	Colorado
Pikeminnow (=squawfish), Colorado except Salt and Verde R. drainages, AZ	<i>Ptychocheilus lucius</i>	Deep turbid strongly flowing water, eddies, runs, flooded bottoms, or backwaters	E	Colorado
Sturgeon, pallid	<i>Scaphirhynchus albus</i>	Free-flowing riverine	E	Colorado
Sucker, razorback entire	<i>Xyrauchen texanus</i>	Slow areas, backwaters, and eddies of medium to large rivers	E	Colorado
Tern, least interior pop.	<i>Sterna antillarum</i>	Open sandy or gravelly beach, dredge spoil and other open shoreline areas	E	Colorado
Wild-buckwheat, clay-loving	<i>Eriogonum pelinophilum</i>	Whitish, alkaline clay soils on Mancos shale	E	Colorado
Wolf, gray Lower 48 States, except where delisted and where EXPN. Mexico	<i>Canis lupus</i>	Mixed, grassland/herbaceous	E	Colorado
Bladderpod, Dudley Bluffs	<i>Lesquerella congesta</i>	Barren white outcrops exposed along drainages	T	Colorado

T - Threatened

E - Endangered

6.5 ENDANGERED AND THREATENED SPECIES BY STATE

COMMON NAME	SCIENTIFIC NAME	HABITAT	STATUS	STATE
Butterfly plant, Colorado	<i>Gaura neomexicana</i> var. <i>coloradensis</i>	Moist areas of floodplains	T	Colorado
Cactus, Colorado hookless	<i>Sc/erocactus g/aucus</i>	Alluvial benches along the Green, Colorado and Gunnison Rivers	T	Colorado
Cactus, Mesa Verde	<i>Sc/erocactus mesae-verdae</i>	Gravelly, dark, sandy loams on slopes or hills	T	Colorado
Ladies'-tresses, Ute	<i>Spiranthes diluvialis</i>	Moist to very wet meadows along streams	T	Colorado
Lynx, Canada (Contiguous U.S. DPS)	<i>Lynx canadensis</i>	Mature forests with dense undergrowth	T	Colorado
Mouse, Preble's meadow jumping U.S.A., north-central CO	<i>Zapus hudsonius preblei</i>	Heavily vegetated, shrub-dominated streamside and upland along foothills	T	Colorado
Mustard, Penland alpine fen	<i>Eutrema penlandii</i>	Alpine tundra, moss-covered peat fens	T	Colorado
Owl, Mexican spotted	<i>Strix occidentalis lucida</i>	Forest, woodlands	T	Colorado
Plover, piping except Great Lakes watershed	<i>Charadrius melodus</i>	Sandy beaches, islands	T	Colorado
Skipper, Pawnee montane	<i>Hesperia leonardus montana</i>	Open grassy areas including native prairies, fields, barrens, and meadows	T	Colorado
Trout, greenback cutthroat	<i>Oncorhynchus clarki stomias</i>	Freshwater; Front Range streams and lakes	T	Colorado
Twinpod, Dudley Bluffs	<i>Physaria obcordata</i>	Barren, raw exposures of the Coalmont Formation, a rusty-colored sandy substrate	T	Colorado
Milk-vetch, Osterhout	<i>Astragalus osterhoutii</i>	Highly seleniferous soils	E	Colorado
Plover, piping except Great Lakes watershed	<i>Charadrius melodus</i>	Lakeshore beaches	T	Kansas
Bat, gray	<i>Myotis grisescens</i>	Caves and mines; rivers adjacent to forests	E	Kansas
Beetle, American burying	<i>Nicrophorus americanus</i>	Cropland/hedgerow	E	Kansas
Crane, whooping except where EXPN	<i>Grus americana</i>	Freshwater marshes and wet prairies	E	Kansas
Curlew, Eskimo	<i>Numenius borealis</i>	Cropland/hedgerow, grassland/herbaceous, tundra	E	Kansas

T - Threatened

E - Endangered

6.5 ENDANGERED AND THREATENED SPECIES BY STATE

COMMON NAME	SCIENTIFIC NAME	HABITAT	STATUS	STATE
Ferret, black-footed entire population, except where EXPN	<i>Mustela nigripes</i>	Grasslands, steppe, and shrub steppe	E	Kansas
Shiner, Topeka	<i>Notropis topeka</i> (=tristis)	Streams	E	Kansas
Sturgeon, pallid	<i>Scaphirhynchus albus</i>	Free-flowing riverine	E	Kansas
Tern, least interior pop.	<i>Sterna antillarum</i>	Open sandy or gravelly beach, dredge spoil and other open shoreline areas	E	Kansas
Madtom, Neosho	<i>Noturus placidus</i>	Large, medium-gradient streams	T	Kansas
Milkweed, Mead's	<i>Asclepias meadii</i>	Dry or mesic prairies and igneous glades with rocky outcrops	T	Kansas
Orchid, western prairie fringed	<i>Platanthera praeclara</i>	Mesic to wet prairies	T	Kansas
Shiner, Arkansas River Arkansas R. Basin	<i>Notropis girardi</i>	Benthopelagic; freshwater	T	Kansas

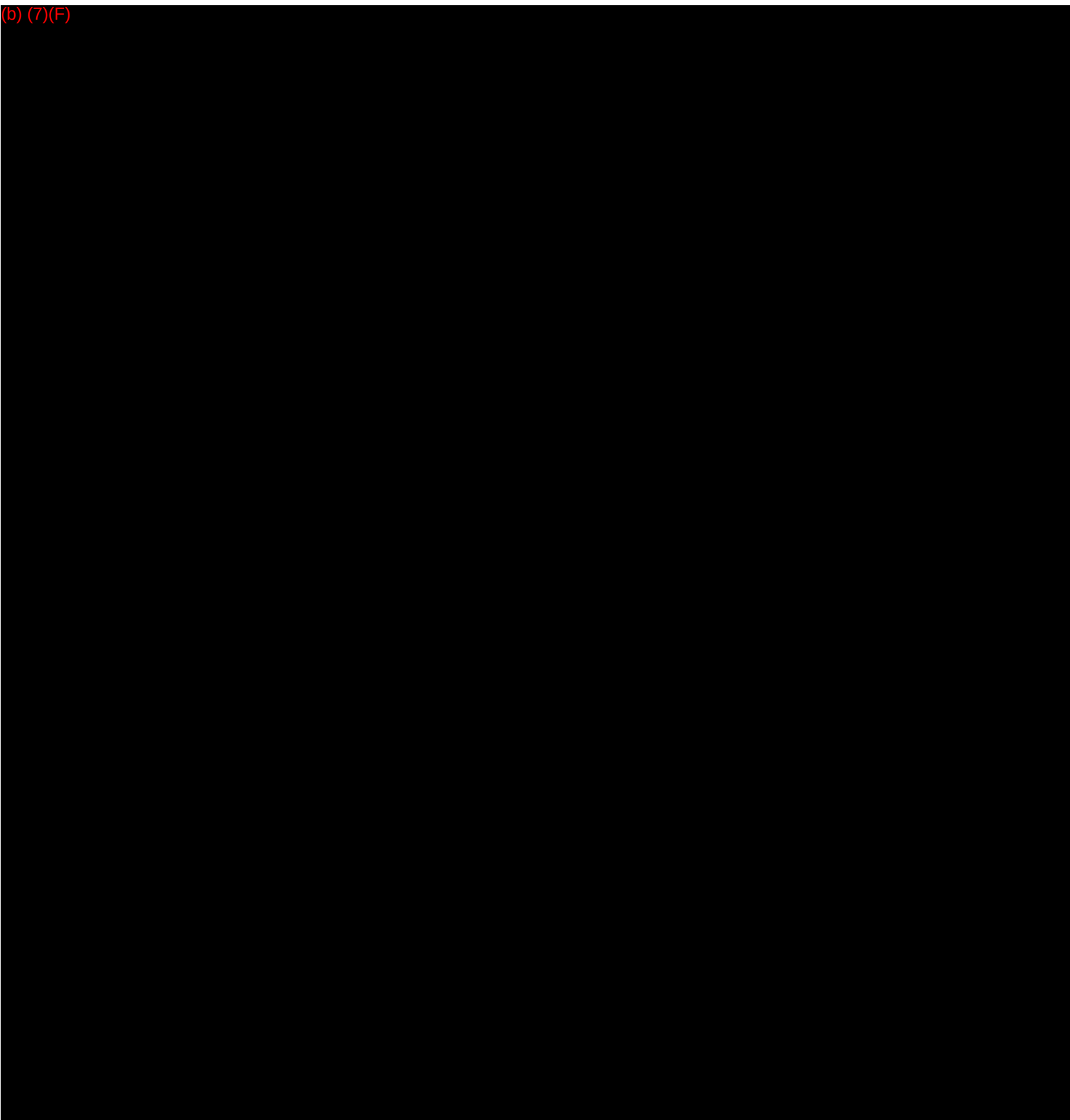
T - Threatened

E - Endangered

(b) (7)(F)



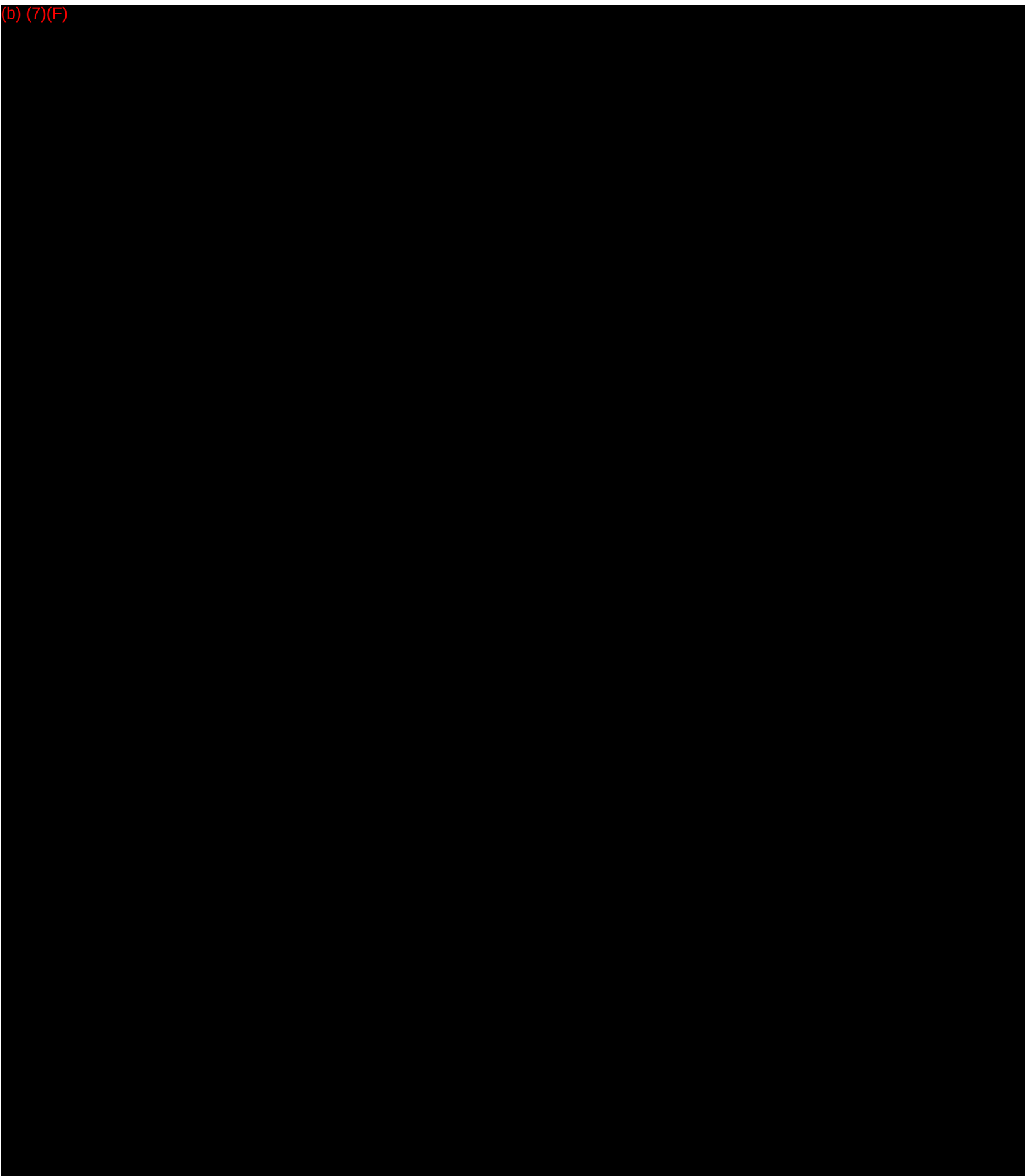
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(b) (7)(F)



(b) (7)(F)



6.8 TACTICAL PLAN INDEX

SITE#	SITE NAME
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6.9 TACTICAL PLANS

SECTION 7 SUSTAINED RESPONSE ACTIONS

Last revised: August 28, 2013

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 Contracts, Contractor Equipment, and Labor

7.1.4 Command Post

Figure 7.1-2 - Command Post Checklist

7.1.5 Staging Area

7.1.6 Communications Plan

Figure 7.1-3 - Communications Checklist

7.2 Media Relations

7.2.1 What to Do if You Are Contacted by Media

7.3 Site Security Measures

Figure 7.3-1 - Site Security Checklist

7.4 Waste Management

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7.4.1 Waste Storage

Figure 7.4-3 - Temporary Storage Methods

SECTION 7

SUSTAINED RESPONSE ACTIONS, CONTINUED

7.4.2 Waste Transfer

7.4.3 Waste Disposal

Figure 7.4-4 - Facility Specific Disposal Locations

7.1 RESPONSE RESOURCES

7.1.1 Response Equipment

CATEGORY	TYPE/MODEL	QUANTITY	SIZE	YEAR PURCHASED	OPERATIONAL STATUS	LOCATION AT FACILITY
Boom	Oil Containment	100'	2.5" x 4"	2008	Operational	Platteville, CO
Sorbent Material	Sorbent Boom	2	5"	2008	Operational	Platteville, CO
Sorbent Material	Sorbent Pads	2 bags		2008	Operational	Platteville, CO
Sorbent Material	Sorbent	10 bags			Operational	Platteville, CO
Other	Chainsaw	1		2008	Operational	Platteville, CO
Other	Portable Generator	1		2008	Operational	Platteville, CO
Other	Water Pump	1		2008	Operational	Platteville, CO
Other	Back Pack Blower			2008	Operational	Platteville, CO
Other	Section Hose	40'	2"	2008	Operational	Platteville, CO
Other	Discharge Hose	75'	2"	2008	Operational	Platteville, CO
Other	Misc. Rakes, Shovels, Tools	Varies		2008	Operational	Platteville, CO

*Note: Response equipment is tested and deployed as described in APPENDIX A of the Spill Response Plan.

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

* USCG Classified OSRO for facility

COMPANY/CONTRACTOR	EQUIPMENT	RESPONSE TIME
*Acme Products Company, Inc. Tulsa, OK	Full Response Capabilities	4 hours
*Veolia Special Services (Subcontracted by ACME) Ponca City, OK	Full Response Capabilities	4 hours
*Environmental Restoration (Subcontracted by ACME) Denver, CO	Full Response Capabilities	4 hours
*Haz-Mat Response (Subcontracted by ACME) Great Bend, KS	Full Response Capabilities	4 hours

7.1.2 Response Equipment Inspection and Maintenance

Company response equipment is tested and inspected as noted below. The Facility Manager is responsible for ensuring that the following response equipment and testing procedures are implemented. These consist of:

Containment boom	During annual boom deployment exercises, boom will be inspected for signs of structural deficiencies. If tears in fabric or rotting is observed, boom will be repaired or replaced. In addition, end connectors will be inspected for evidence of corrosion. If severe corrosion is detected, equipment will be repaired or replaced.
Miscellaneous equipment	Other response equipment identified in this Plan will be inventoried and tested on an annual basis to ensure that the stated quantities are in inventory and in proper working order. The equipment inspection and deployment exercises are recorded and maintained at the facility and retained for a period of five years. Exercise requirements are listed in APPENDIX A. A Spill/Exercise Documentation form is in FIGURE A.1-3. FIGURE A.1-4 provides a log for response equipment testing and deployment drills.

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
- Contractors without USCG classification deploy and inspect boom to meet PREP guidelines. Company requires that these exercises are completed annually
- APPENDIX B contains evidence of contracts for the Company's primary response contractors and equipment lists of contractors without USCG classification

7.1.4 Command Post

In the event of a major spill or other emergency, both an off-site Emergency Operations Center (EOC) and a Command Post may be established. For a minor emergency, only a Command Post may be established. Refer to FIGURE 7.1-2 for guidelines in establishing a Command Post.

FIGURE 7.1-2 - COMMAND POST CHECKLIST

COMMAND POST CHECKLIST
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.

Command Posts for this facility are located at:

7.1.5 Staging Area

In a major spill response, numerous staging areas may be required to support containment and cleanup 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

Staging areas for this facility are located at:

7.1.6 Communications Plan

Normal Company communications to each facility are conducted via telephone lines, cellular telephones, satellite phones, e-mail, and fax machines. Company owned communications equipment and quantities commonly used to address response communications are listed below:

Hand held UHF Radios

Cellular Phones - Key personnel

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 7.1-3 for guidelines to setup communications.

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.

FIGURE 7.1-3 - COMMUNICATIONS CHECKLIST

COMMUNICATIONS CHECKLIST	
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:	
● 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.	

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

7.2 MEDIA RELATIONS

General

It is Company practice to respond honestly to requests for information and keep the media informed of Company activities, when appropriate. The Company provides the media press releases, information and photos on a regular basis.

The news media are important liaisons for the Company with the public. Ethical and professional cooperation with reporters is the best guarantee that resulting news reports are factual and accurately present the Company's position.

The Disclosure Committee oversees the timely delivery and accurate portrayal of the Company's financial condition in all Company communications to shareholders and investors. It is the Company's policy that all disclosures made by the Company to its security holders or the investment community should be accurate and complete and fairly present the Company's financial condition and results of operations in all material respects, and should be made on a timely basis as required by applicable laws and stock exchange requirements. Among the responsibilities of the Disclosure Committee is to receive information from throughout the Company that may be material and determine the need for and timing of disclosure. The Disclosure Committee should serve as a central point to which material information should be directed and a resource when people have questions regarding materiality and need for disclosure. The Disclosure Committee includes the following persons: the Chief Executive Officer, the General Counsel, the Chief Financial Officer, the Chief Accounting Officer, the Vice President, Corporate Planning and Strategic Initiatives, and the Assistant Treasurer.

When We Decline to Participate

There are certain activities and information that may be considered confidential - such as contract terms which have confidentiality clauses, negotiations, employee and customer information or information which may involve ongoing investigations - and the Company may decline to respond about these issues. We typically provide the reason we cannot participate.

Spokesperson(s)

As a general rule, media requests and questions should be routed through the Company's official spokesperson(s) in the corporate office to an executive in the corporate office.

There will be occasions when you may find yourself on the receiving end of a media call. The guidelines provided on the following pages will help you effectively handle these situations.

7.2.1 What to Do if You Are Contacted by Media

SemGroup News Media Guidelines

SemGroup has adopted a General Policy on Disclosures and has established a Disclosure Committee. The policy is designed to prevent the unauthorized release of material non-public information about the Company.

Emergency, crisis or other unusual situations may arise in which you are contacted by the media. In all such situations, you should refer the reporter to a member of the Disclosure Committee. The main phone number at our corporate headquarters is (918) 524-8100.

7.2.1 What to Do if You Are Contacted by Media, Continued

SemGroup News Media Guidelines, Continued

Depending on the circumstances, a member of the Disclosure Committee may authorize you to respond directly to a member of the media. If this should occur, the Disclosure Committee member will be responsible for discussing with you the key points that you should make. In addition, there may be an emergency, crisis or unusual situation where you find yourself in the position of responding to the news media or where you are required to make an immediate disclosure to the media. If you are asked or required to respond to the media, you should familiarize yourself with these News Media Guidelines, which provide guidance of a more general nature for dealing with the media.

Do:

- Assume your interview or conversation is being recorded and always assume the reporter's recorder or the television camera is running even after the interview has ended.
- Listen carefully to the reporter's question - it may provide information that is critical to your response.
- Wait for the reporter to finish a question before you begin your answer.
- Be honest, factual and as specific as possible.
- Stay cool and collected - remember that you are the expert.
- State the most important facts first - "who, what, when where, why and how."
- Keep answers short.
- Realize most reporters do their homework before they call.
- Be prepared to address negative aspects of a subject IF ASKED.
 - Know the Company's position regarding the topic.
 - Acknowledge the public's concern, if it is appropriate to the situation.
- Say, "I don't know, but we'll get the answer and someone will get back to you," if you don't know the answer to a question. Then follow through.
- Tell the reporter why you can't release certain information; say when you will do so.
- Be prepared for interruptions with additional questions.
- Beware that a reporter may repeat the same question in different ways to gain information that you do not intend to provide.
- Remember that any statement you make - or part of it - may end up in print or on the air.

Don't:

- DON'T TALK "OFF THE RECORD." There is no such thing.
- Don't say "no comment" - if you can't discuss an issue because it is confidential, in litigation or is proprietary information, say so.
- Don't relax so much that you say something you wish you had not said.
- Don't accept "what if" questions. Stick to the facts.
- Don't speak on behalf of an absent party.
- Don't offer your personal opinion: you are presenting the Company and its position.
- Don't speculate.
- Don't use industry jargon. Be clear and use terms the reporter and audiences will understand.
- Don't over-answer the question asked.
- Don't lie.

7.2.1 What to Do if You Are Contacted by Media, Continued

In Emergency Situations:

- Provide only facts that are not in dispute, such as the type of situation, the name of the facility involved, the date and time of the accident/crisis/incident.
- State that more information will be forthcoming.
- DO NOT identify injured or deceased until it has been absolutely ascertained that next-of-kin have been appropriately notified.

Only Answer Questions in Your Area of Expertise

Only answer questions if you have thorough knowledge.

If the subject is not in your area of expertise, tell the reporter that you will have a Company person who is more knowledgeable about the topic contact him or her.

Refer the following questions to corporate headquarters:

- Corporate matters or questions of national or international interest.
- Topics outside your expertise.
- A local matter on which you do not have sufficient information to reply.
- Subjects which involve corporate policies.

In all cases, inform your immediate supervisor about the contact and also let the corporate office know about the inquiry.

What To Do If You Have Time to Prepare for an Interview

Write down the reporter's questions and the positive points you would like to see in the story; have your notes in front of you when you call the reporter back.

List additional questions that you think also might be asked, then jot down appropriate answers to them.

List the key points - positive messages - you want to make during the interview and look for opportunities to weave them into the interview.

Don't respond until you are prepared, but do respect the reporter's deadline.

After All Interviews:

- You can ask to check technical points, but do not ask to preview the interview or story.
- Never go over a reporter's head to try to stop a story.
- Do not send gifts to reporters - it is considered unethical for them to accept.

7.2.1 What to Do if You Are Contacted by Media, Continued

Turning a Question into an Opportunity

It is possible to turn a reporter's question into an opportunity to communicate a positive answer. The technique, called bridging, is simple: you answer the question with a one-word answer - yes or no - followed immediately with "bridge words" that lead into your desired message

Again, make sure that any information you are providing is accurate.

Some often used bridge words are:

- Concern
- Cooperating
- Understand
- Investigate
- Safety
- Action steps

Examples:

"...right, now our primary concern is for the safety of our employees and others who still are _____."

"...we are cooperating fully with the (name of agency)'s investigation, and we expect to have an answer in the very near future."

"...we understand your need for timely, accurate information, and we will provide it just as soon as it becomes available."

"...we will investigate the incident during the next several days to try to determine the cause."

"...our safety record at (name of the facility) is one of the best in the industry, and in fact it was recognized by (name of industry organization) for having the best safety record in North America."

"...we are taking the following action steps to alleviate the problem: first _____; second _____; and third _____."

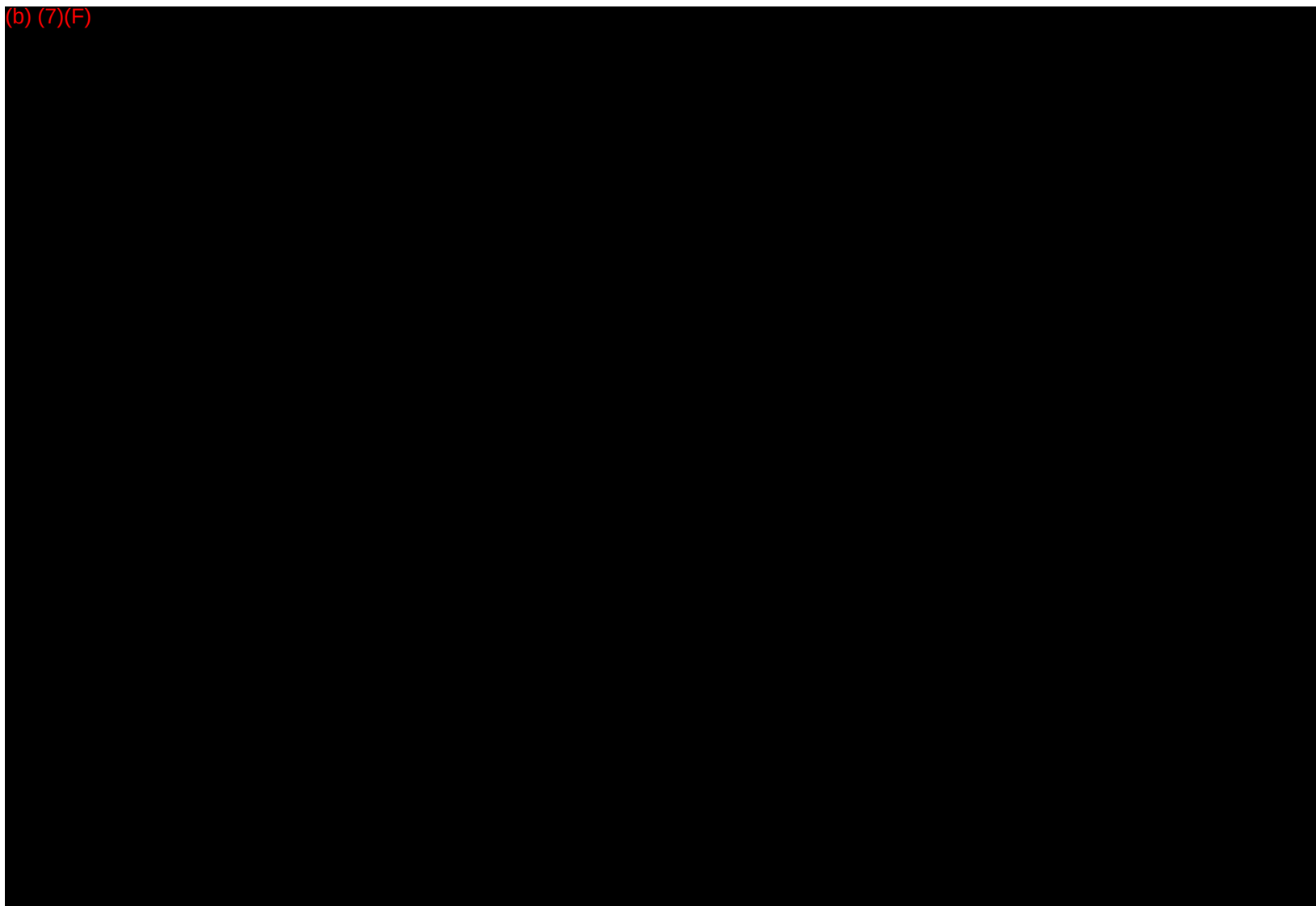
Final Reminders

1. There is always a tendency to keep on talking and that can lead to trouble.

If the interview is ending and the reporter asks, "Is there anything that I didn't ask that you would like to add?" make sure you have made your key points, but don't volunteer anything else. You can simply say, "I believe we covered everything."

2. Remember that you are speaking on behalf of the Company, not yourself.
3. Make no assumptions; make statements only of fact.
4. Realize that anything you say may be quoted: NEVER MAKE OFF-THE-RECORD COMMENTS.

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7.4 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 5.4) addressing the proper PPE and waste handling procedures
- Development of a Disposal Plan (SECTION 5.6) in accordance with any federal, state, and/or local regulations. Facility-specific disposal locations for different types of materials are listed in FIGURE 7.4-4.
- 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 permits
- Documentation of all waste handling and disposal activities
- Disposal of all waste in a safe and approved manner

Good hazardous waste management includes:

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

- The management of the wastes 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
- 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 flow chart for waste management guidelines is provided in FIGURE 7.4-1. An overall checklist for containment and disposal is provided in FIGURE 7.4-2.

FIGURE 7.4-1 - WASTE MANAGEMENT FLOW CHART

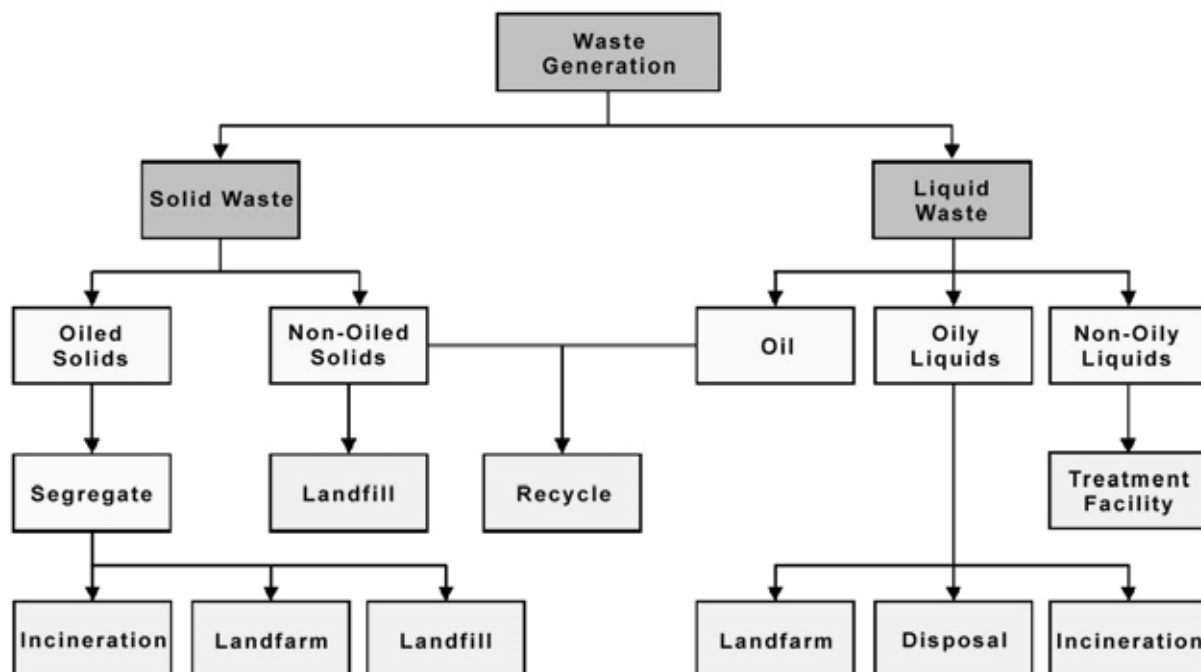


FIGURE 7.4-2 - GENERAL WASTE CONTAINMENT AND DISPOSAL CHECKLIST

CONSIDERATION
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 identification number and generator number(s) been received, if they are not already registered with State or Federal Agencies?
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?

7.4.1 Waste 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 ultimate disposal option.

Use of any site for storage is dependent on the approval of local authorities. The following elements affect the choice of a potential storage site:

- Geology
- Soil
- Surface water
- Covered materials
- Climatic factor
- Toxic air emissions
- Access
- Ground water
- Flooding
- Slope
- Capacity
- Land use
- Security
- Public contact

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	X				0.2-0.5 yd ³
Bags		X	X	X			1.0-2.0 yd ³
Boxes			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

7.4.2 Waste Transfer

In most oil spill response operations, it would be necessary to transfer recovered oil and oil debris from one point to another several times before the oil and oily debris are ultimately disposed of at a state approved disposal site. Depending on the location of response operations, any or all of the following transfer operations may occur:

- Directly into the storage tank of a vacuum device.
- Directly in to impermeable bags that, in turn, are placed in impermeable containers.
- From a vacuum device storage tank to a truck.
- From containers to trucks.
- From trucks to lined pits.
- From lined pits to incinerators and/or landfills.
- From a tank truck to a processing system (i.e., oil/water separator).
- From a processing system to a recovery system and or incinerator.
- From a skimming vessel or flexible bladder to a barge.
- From a barge to a tank truck.
- Directly into the storage tank on a dredge.
- From portable or vessel mounted skimmers into flexible bladder tanks, the storage tanks of the skimming vessel itself, or a barge.

There are four general classes of transfer systems that could be employed to effect oily waste transfer operations. The following is a brief description of the four transfer systems:

Pumps

Rotary pumps, such as centrifugal pumps, may be used when transferring large volumes of oil, but they may not be appropriate for pumping mixtures of oil and water. The extreme shearing action of centrifugal pumps tends to emulsify oil and water, thereby increasing the viscosity of the mixture and causing low, inefficient transfer rates.

The resultant emulsion would also be more difficult to separate into oil and water fractions. Lobe or "positive displacement" pumps work well on heavy, viscous oils, and do not emulsify the oil/water mixture. Double-acting piston and double acting diaphragm pumps are reciprocating pumps that may also be used to pump oily wastes.

Vacuum Systems

Vacuum systems, such as air conveyors, vacuum trucks and portable vacuum units, may be used to transfer viscous oils and debris but they usually pick up a very high water/oil ratio.

Belt / Screw Conveyors

Conveyor may be used to transfer oily wastes containing a large amount of debris. These systems can transfer weathered debris laden oil either horizontally or vertically for short distances but are bulky and difficult to operate.

Wheeled Vehicles

Wheeled vehicles may be used to transfer liquid waste of oily debris to storage or disposal sites. These vehicles are readily available but have a limited rate (i.e., 100 bbls) and require good site access.

7.4.3 Waste Disposal

In order to obtain the best overall Incident Disposal Plan, a combination of methods should be used. There is no template or combination of methods that can be used in every spill situation. Each incident should be reviewed carefully to ensure an appropriate combination of disposal techniques are employed.

The following is a brief description of some disposal techniques available for recovered oil and oily debris.

Recycling

Recycling involves processing discarded materials for another use.

Incineration

This technique entails the destruction of the recovered oil by high temperature thermal oxidation reactions. There are licensed incineration facilities as well as portable incinerators that may be brought to a spill site. Incineration may require the approval of the local Air Pollution Control Authority.

In Situ Burning / Open Burning

Burning techniques entail igniting oil or oiled debris allowing it to burn under ambient conditions. These disposal techniques are subject to restrictions and permit requirements established by federal, state, and local laws. Permission for in situ burning may be difficult to obtain when the burn takes place near populated areas.

As a general rule, in situ burning would be appropriate only when atmospheric conditions will allow the smoke to rise several hundred feet and rapidly dissipate. Smoke from burning oil will normally rise until its temperature drops to equal the ambient temperature. Afterwards, it will travel in a horizontal direction under the influence of prevailing winds.

Landfill Disposal

This technique entails burying the recovered oil in an approved landfill in accordance with regulatory procedures. Landfill disposal of free liquids is prohibited by federal law in the United States.

FIGURE 7.4-4 - FACILITY SPECIFIC DISPOSAL LOCATIONS

MATERIAL	DISPOSAL FACILITY	LOCATION
Recovered Product	Garner Environmental	1717 West 13th Street Deer Park, Texas
	Acme Products Company	2666 North Darlington Tulsa, Oklahoma
	Plumb Thicket Landfill	440 NE 150th Road Harper, KS 67058
	Waste Management Denver Landfill	3500 South Gun Club Road Aurora, CO 80018
Contaminated Soil	BFI Waste Services	Oklahoma Landfill 7600 SW 15th Street Oklahoma City, OK
		Canadian Valley Landfill Hwy 9A, Earlsboro, OK
	Plumb Thicket Landfill	440 NE 150th Road Harper, KS 67058
	Waste Management Denver Landfill	3500 South Gun Club Road Aurora, CO 80018
Contaminated Equipment	Garner Environmental	1717 West 13th Street Deer Park, Texas
	Acme Products Company	2666 North Darlington Tulsa, Oklahoma
	Plumb Thicket Landfill	440 NE 150th Road Harper, KS 67058
	Waste Management Denver Landfill	3500 South Gun Club Road Aurora, CO 80018
Personnel Protective Equipment	Garner Environmental	1717 West 13th Street Deer Park, Texas
	Acme Products Company	2666 North Darlington Tulsa, Oklahoma
	Plumb Thicket Landfill	440 NE 150th Road Harper, KS 67058
	Waste Management Denver Landfill	3500 South Gun Club Road Aurora, CO 80018
Decontamination Solutions	Garner Environmental	1717 West 13th Street Deer Park, Texas
	Acme Products Company	2666 North Darlington Tulsa, Oklahoma
	Plumb Thicket Landfill	440 NE 150th Road Harper, KS 67058
	Waste Management Denver Landfill	3500 South Gun Club Road Aurora, CO 80018
Adsorbents and Spent Chemicals	Garner Environmental	1717 West 13th Street Deer Park, Texas
	Acme Products Company	2666 North Darlington Tulsa, Oklahoma
	Plumb Thicket Landfill	440 NE 150th Road Harper, KS 67058
	Waste Management Denver Landfill	3500 South Gun Club Road Aurora, CO 80018

SECTION 8 DEMOBILIZATION / POST-INCIDENT REVIEW

Last revised: January 2005

8.1 Terminating the Response

8.2 Demobilization

Figure 8.2-1 - Demobilization Checklist

8.3 Post-Incident Review

Figure 8.3-1 - PREP Evaluation Sheet

8.1 TERMINATING THE RESPONSE

- 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-spill condition before terminating operations
- Determine what documentation should be maintained, where, and for how long
- 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 5.8). 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
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.

8.3 POST-INCIDENT REVIEW

All facility personnel involved in an incident that involved notification of an OSRO or at the companies discretion shall be debriefed (by the Company) within two weeks after termination of operations. A Standard Incident Debriefing Form is provided in FIGURE 8.3-1. The primary purpose of the post-incident review is to identify actual or potential deficiencies in the Plan and determine the changes required to correct the deficiencies. The post-incident review is also intended to identify which response procedures, equipment, and techniques were effective and which were not and the reason(s) why. This type of information is very helpful in the development of a functional Plan by eliminating or modifying those response procedures that are less effective and emphasizing those that are highly effective. This process should also be used for evaluating training drills or exercises.

FIGURE 8.3-1 - PREP EVALUATION SHEET

ORGANIZATIONAL DESIGN OBJECTIVES			
OBJECTIVE #1: NOTIFICATION Test notification procedures in the ICP.	YES	NO	COMMENTS
1. Test notifications from Operations Center to field personnel			
2. Make notifications per the FRP			
3. Confirm telephone numbers in the plan are correct			
4. Document notifications			
OBJECTIVE #2: STAFF MOBILIZATION Demonstrate ability to assemble the incident response organization identified in the FRP.	YES	NO	COMMENTS
1. Contact and assemble team in a timely manner			
2. Test design of pre-designated command post			
3. Determine staffing requirements for continuous operations			
OBJECTIVE #3: INCIDENT MANAGEMENT SYSTEM Demonstrate The ability of the SMT to operate within the ICS framework identified in the ICP.	YES	NO	COMMENTS
1. Demonstrate an efficient and effective command structure			
2. Define strategic objectives quickly			
3. Further familiarize team members with their roles			
4. Integrate the Company with external agencies appropriately within the Unified Command structure			
5. Provide adequate administrative support			
6. Provide meeting schedule for coordinated response management			
Sub-Objective 3.1 - Safety Officer			
1. Perform hazard assessment			
2. Establish safety zones			
3. Make MSDS available for the spilled product			
4. Develop Site Safety Plan			
5. Coordinate public safety issues with local officials			
Sub-Objective 3.2 - Liaison Officer			
1. Make all agency notifications in a timely manner			
2. Request safety zones			
3. Provide updates to agency personnel at regular intervals			
Sub-Objective 3.3 - Public Information Officer			
1. Issue preliminary statement within one hour of SMT activation			
2. Identify a location and prepare for an initial press briefing			
3. Establish a system to handle media/concerned citizens			
4. Notify Rose Rock employees not part of the SMT as appropriate			

FIGURE 8.3-1 - PREP EVALUATION SHEET, CONTINUED

Sub-Objective 3.4 - Operations	YES	NO	COMMENTS
1. Prepare an initial plan of action			
2. Develop appropriate tactics to implement action plans			
3. Establish effective communications with the field			
4. Implement the Site Safety Plan			
Sub-Objective 3.5 - Planning			
1. Identify spill extent			
2. Conduct spill trajectory analysis			
3. Identify environmental sensitivities			
4. Determine clean-up goals			
5. Recommend appropriate level of environmental monitoring and testing to confirm clean-up goals are met			
6. Assess the need to implement alternative water supply contingency plans			
7. Develop short and long range tactical plans			
8. Prepare an initial Incident Action Plan			
9. Post maps			
10. Post and maintain situation status boards			
11. Track resources (ordered, staged, assigned, and status)			
Sub-Objective 3.6 - Logistics			
1. Obtain adequate personnel, services and equipment as requisitioned by operations			
2. Establish security at all incident locations			
3. Develop a Medical Plan			
4. Develop a Communications Plan			
OPERATIONAL RESPONSE OBJECTIVES			
OBJECTIVE #4: DISCHARGE CONTROL Demonstrate the ability of the SMT to stop the discharge at the source.	YES	NO	COMMENTS
1. Document measures taken to limit volume of product spilled			
2. Identify discharge control resources in a timely manner			
OBJECTIVE #5: ASSESSMENT Demonstrate the ability of the SMT to provide an initial assessment of the discharge and identify adequate response resources.	YES	NO	COMMENTS
1. Conduct surveillance to determine the extent of the oiled area			
2. Determine the volume of the product spilled			
3. Identify and prioritize sensitive areas			
4. Obtain current weather and forecasts			

FIGURE 8.3-1 - PREP EVALUATION SHEET, CONTINUED

OBJECTIVE #6: CONTAINMENT Demonstrate ability of spill removal organization to contain discharge.	YES	NO	COMMENTS
1. Identify response resources appropriate to operating environment			
2. Simulate deployment of response resources in a timely manner			
3. Consider all available containment technologies			participated in exercise and equipment deployment
OBJECTIVE #7: RECOVERY Demonstrate the ability of the spill removal organization to recover the discharged product.	YES	NO	COMMENTS
1. Determine the appropriate recovery system(s) for the product and type of environment			
2. Identify sufficient recovery systems and calculate capacity			
3. Consider all available recovery technologies			
OBJECTIVE #8: PROTECTION Demonstrate the ability of the spill removal organization to protect the environmentally and economically sensitive areas identified in the ICP.	YES	NO	COMMENTS
1. Consider all available response techniques			
Sub-Objective 8.1 - Population Protection			
1. Identify public at risk and simulate notification			
2. Consult with local government officials to determine if evacuation is necessary			
3. Determine what, if any, testing and/or monitoring is required for public safety and health concerns			
4. Decide how to handle questions from the public regarding any health concerns			
Sub-Objective 8.2 - Wildlife Recovery and Rehabilitation			
1. Identify wildlife at risk			
2. Identify rare, threatened or endangered species at risk			
3. Determine the need for a Wildlife Rehabilitation Contractor			
4. Determine where the Rehab operation could be established			
OBJECTIVE #9: DISPOSAL Demonstrate the ability of the SMT to arrange for disposal of recovered product, contaminated water, oiled debris and other waste.	YES	NO	COMMENTS
1. Consider waste segregation during recovery operations			
2. Identify and resource adequate temporary storage of liquid wastes			
3. Identify waste disposal options			

FIGURE 8.3-1 - PREP EVALUATION SHEET, CONTINUED

RESPONSE SUPPORT OBJECTIVES			
OBJECTIVE #10: COMMUNICATIONS Demonstrate the ability to establish an effective communications system for the response organization.	YES	NO	COMMENTS
1. Ensure an effective communications system			
2. Test field communications from the site to the Command Post			
3. Ensure effective communications between sections of the SMT			
OBJECTIVE #11: TRANSPORTATION Demonstrate the ability to provide effective transportation for execution of the discharge control and support functions.	YES	NO	COMMENTS
1. Discuss the process for transporting equipment, personnel, etc. to the incident scene or staging area			
2. Identify and resource ground transportation, including emergency medical needs			
3. Identify aircraft available for aerial observation and spotter duties			
OBJECTIVE #12: PERSONNEL SUPPORT Demonstrate the ability to provide the necessary support for all personnel associated with the response.	YES	NO	COMMENTS
1. Locate adequate housing and facilities for response personnel			
2. Demonstrate the ability to provide suitable feeding arrangements for personnel involved in the response			
OBJECTIVE #13: EQUIPMENT MAINTENANCE & SUPPORT Demonstrate the ability to maintain and support all equipment associated with the response.	YES	NO	COMMENTS
1. Ensure sufficient equipment is available to allow for delays due to equipment repairs and maintenance			
OBJECTIVE #14: PROCUREMENT Demonstrate the ability to establish an effective procurement system.	YES	NO	COMMENTS
1. Demonstrate the ability to procure sufficient resources to mount and sustain an organized response			
2. Identify additional support equipment (decontamination, communication, PPE, etc.)			
OBJECTIVE #15: DOCUMENTATION Demonstrate the ability of the SMT to document operational and support aspects of the response and provide detailed records of decisions and actions taken.	YES	NO	COMMENTS
1. Provide documentation guidelines			
2. Establish a secure filing system			
3. SMT members maintain individual logs			
4. Document meetings			

APPENDICES

A. TRAINING / EXERCISES

B. CONTRACTOR RESPONSE EQUIPMENT

C. HAZARD EVALUATION AND RISK ANALYSIS

D. CROSS-REFERENCES

E. ACRONYMS AND DEFINITIONS

APPENDIX A

TRAINING / EXERCISES

Last revised: June 7, 2012

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 - PREP Evaluation Sheet

Figure A.1-4 - Qualified Individual Quarterly Notification Form

A.2 Training Program

Figure A.2-1 - Training Requirements

Figure A.2-2 - PREP Training Program Matrix

A.1 EXERCISE REQUIREMENTS AND SCHEDULES

- 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
- The Facility Manager is responsible for the following aspects:
 - Scheduling
 - Maintaining records
 - Implementing
 - Evaluation of the Company's training and exercise program
 - Post-drill evaluation improvements
- FIGURE A.1-2 provides descriptions of exercise requirements, FIGURE A.1-3 provides a PREP Evaluation Sheet or corresponding Company form may be used, and FIGURE A.1-4 provides a Qualified Individual Quarterly Notification Form.

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:	
• Unified Command	Demonstrate the ability of the spill response organization to work within a unified command.
• Response management system	Demonstrate the ability of the response organization to operate within the framework of the response management system identified in their respective plans.
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 an 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.

FIGURE A.1-2 - EXERCISE REQUIREMENTS

EXERCISE TYPE	EXERCISE CHARACTERISTICS
Facility/QI notification	• Conducted quarterly • The facility initiates mock spill notification to QI • The Qualified Individual documents time/date of notification, name, and phone number of individual contacted • Document in accordance with form in FIGURE A.1-3
Equipment deployment	• Conducted annually • Document in accordance with form in FIGURE A.1-3
IMT tabletop	• 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	• Company will either participate in unannounced tabletop exercise or equipment deployment exercise on an annual basis, if selected • Company may take credit for participation in government initiated unannounced drill in lieu of drill required by PREP guidelines • 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	• 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	• 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	• Company will maintain exercise records for five years following completion of each exercise • Records will be maintained in the Facility office • 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.)

FIGURE A.1-3 - PREP EVALUATION SHEET

ORGANIZATIONAL DESIGN OBJECTIVES			
OBJECTIVE #1: NOTIFICATION Test notification procedures in the ICP.	YES	NO	COMMENTS
1. Test notifications from Operations Center to field personnel			
2. Make notifications per the FRP			
3. Confirm telephone numbers in the plan are correct			
4. Document notifications			
OBJECTIVE #2: STAFF MOBILIZATION Demonstrate ability to assemble the incident response organization identified in the FRP.	YES	NO	COMMENTS
1. Contact and assemble team in a timely manner			
2. Test design of pre-designated command post			
3. Determine staffing requirements for continuous operations			
OBJECTIVE #3: INCIDENT MANAGEMENT SYSTEM Demonstrate The ability of the SMT to operate within the ICS framework identified in the ICP.	YES	NO	COMMENTS
1. Demonstrate an efficient and effective command structure			
2. Define strategic objectives quickly			
3. Further familiarize team members with their roles			
4. Integrate the Company with external agencies appropriately within the Unified Command structure			
5. Provide adequate administrative support			
6. Provide meeting schedule for coordinated response management			
Sub-Objective 3.1 - Safety Officer			
1. Perform hazard assessment			
2. Establish safety zones			
3. Make MSDS available for the spilled product			
4. Develop Site Safety Plan			
5. Coordinate public safety issues with local officials			
Sub-Objective 3.2 - Liaison Officer			
1. Make all agency notifications in a timely manner			
2. Request safety zones			
3. Provide updates to agency personnel at regular intervals			
Sub-Objective 3.3 - Public Information Officer			
1. Issue preliminary statement within one hour of SMT activation			
2. Identify a location and prepare for an initial press briefing			
3. Establish a system to handle media/concerned citizens			
4. Notify Rose Rock employees not part of the SMT as appropriate			

FIGURE A.1-3 - PREP EVALUATION SHEET, CONTINUED

Sub-Objective 3.4 - Operations	YES	NO	COMMENTS
1. Prepare an initial plan of action			
2. Develop appropriate tactics to implement action plans			
3. Establish effective communications with the field			
4. Implement the Site Safety Plan			
Sub-Objective 3.5 - Planning			
1. Identify spill extent			
2. Conduct spill trajectory analysis			
3. Identify environmental sensitivities			
4. Determine clean-up goals			
5. Recommend appropriate level of environmental monitoring and testing to confirm clean-up goals are met			
6. Assess the need to implement alternative water supply contingency plans			
7. Develop short and long range tactical plans			
8. Prepare an initial Incident Action Plan			
9. Post maps			
10. Post and maintain situation status boards			
11. Track resources (ordered, staged, assigned, and status)			
Sub-Objective 3.6 - Logistics			
1. Obtain adequate personnel, services and equipment as requisitioned by operations			
2. Establish security at all incident locations			
3. Develop a Medical Plan			
4. Develop a Communications Plan			
OPERATIONAL RESPONSE OBJECTIVES			
OBJECTIVE #4: DISCHARGE CONTROL Demonstrate the ability of the SMT to stop the discharge at the source.	YES	NO	COMMENTS
1. Document measures taken to limit volume of product spilled			
2. Identify discharge control resources in a timely manner			
OBJECTIVE #5: ASSESSMENT Demonstrate the ability of the SMT to provide an initial assessment of the discharge and identify adequate response resources.	YES	NO	COMMENTS
1. Conduct surveillance to determine the extent of the oiled area			
2. Determine the volume of the product spilled			
3. Identify and prioritize sensitive areas			
4. Obtain current weather and forecasts			

FIGURE A.1-3 - PREP EVALUATION SHEET, CONTINUED

OBJECTIVE #6: CONTAINMENT Demonstrate ability of spill removal organization to contain discharge.	YES	NO	COMMENTS
1. Identify response resources appropriate to operating environment			
2. Simulate deployment of response resources in a timely manner			
3. Consider all available containment technologies			
OBJECTIVE #7: RECOVERY Demonstrate the ability of the spill removal organization to recover the discharged product.	YES	NO	COMMENTS
1. Determine the appropriate recovery system(s) for the product and type of environment			
2. Identify sufficient recovery systems and calculate capacity			
3. Consider all available recovery technologies			
OBJECTIVE #8: PROTECTION Demonstrate the ability of the spill removal organization to protect the environmentally and economically sensitive areas identified in the ICP.	YES	NO	COMMENTS
1. Consider all available response techniques			
Sub-Objective 8.1 - Population Protection			
1. Identify public at risk and simulate notification			
2. Consult with local government officials to determine if evacuation is necessary			
3. Determine what, if any, testing and/or monitoring is required for public safety and health concerns			
4. Decide how to handle questions from the public regarding any health concerns			
Sub-Objective 8.2 - Wildlife Recovery and Rehabilitation			
1. Identify wildlife at risk			
2. Identify rare, threatened or endangered species at risk			
3. Determine the need for a Wildlife Rehabilitation Contractor			
4. Determine where the Rehab operation could be established			
OBJECTIVE #9: DISPOSAL Demonstrate the ability of the SMT to arrange for disposal of recovered product, contaminated water, oiled debris and other waste.	YES	NO	COMMENTS
1. Consider waste segregation during recovery operations			
2. Identify and resource adequate temporary storage of liquid wastes			
3. Identify waste disposal options			

FIGURE A.1-3 - PREP EVALUATION SHEET, CONTINUED

RESPONSE SUPPORT OBJECTIVES			
OBJECTIVE #10: COMMUNICATIONS Demonstrate the ability to establish an effective communications system for the response organization.	YES	NO	COMMENTS
1. Ensure an effective communications system			
2. Test field communications from the site to the Command Post			
3. Ensure effective communications between sections of the SMT			
OBJECTIVE #11: TRANSPORTATION Demonstrate the ability to provide effective transportation for execution of the discharge control and support functions.	YES	NO	COMMENTS
1. Discuss the process for transporting equipment, personnel, etc. to the incident scene or staging area			
2. Identify and resource ground transportation, including emergency medical needs			
3. Identify aircraft available for aerial observation and spotter duties			
OBJECTIVE #12: PERSONNEL SUPPORT Demonstrate the ability to provide the necessary support for all personnel associated with the response.	YES	NO	COMMENTS
1. Locate adequate housing and facilities for response personnel			
2. Demonstrate the ability to provide suitable feeding arrangements for personnel involved in the response			
OBJECTIVE #13: EQUIPMENT MAINTENANCE & SUPPORT Demonstrate the ability to maintain and support all equipment associated with the response.	YES	NO	COMMENTS
1. Ensure sufficient equipment is available to allow for delays due to equipment repairs and maintenance			
OBJECTIVE #14: PROCUREMENT Demonstrate the ability to establish an effective procurement system.	YES	NO	COMMENTS
1. Demonstrate the ability to procure sufficient resources to mount and sustain an organized response			
2. Identify additional support equipment (decontamination, communication, PPE, etc.)			
OBJECTIVE #15: DOCUMENTATION Demonstrate the ability of the SMT to document operational and support aspects of the response and provide detailed records of decisions and actions taken.	YES	NO	COMMENTS
1. Provide documentation guidelines			
2. Establish a secure filing system			
3. SMT members maintain individual logs			
4. Document meetings			

FIGURE A.1-4 - QUALIFIED INDIVIDUAL QUARTERLY NOTIFICATION FORM

- I. Purpose: To exercise the communications between the employee who receives an emergency call (most likely a Pipeline Controller) and a Qualified Individual.
- II. Who: Pipeline Controller and Qualified Individuals. (Identified in OPA90 manual)
- III. How Contacted: The Pipeline Controller will attempt to contact the district's Qualified Individual or alternate four times per year, by using the communication devices available. One of the four times will be during hours other than normal working hours.
- IV. How Documented: A QI Notification Form should be completed by the Pipeline Controller. The Control Center will provide the original document to the Control Center Manager. The Control Center Manager will scan a copy of the original and upload the document to:

Rose Rock Midstream Corporate SharePoint site:

Rose Rock Midstream: Libraries: Shared Documents: Procedures:

Control Center: Qualified Individual Quarterly Notification

<http://sharepointprod/sites/semcrude/Shared%20Documents/Forms/AllItems.aspx?RootFolder=%2Fsites%2Fsemcrude%2FShared%20Documents%2FProcedures%2FControl%20Center%2FQualified%20Individual%20Quarterly%20Notification>

FIGURE A.1-4 - QUALIFIED INDIVIDUAL QUARTERLY NOTIFICATION FORM, CONTINUED

Year	Quarter

Pipeline Controller _____

Qualified or Alternate Person	Date and Time call was placed	Was Contact Made	Comments
		Yes ☐ No ☐	Quarterly QI Drill
		Yes ☐ No ☐	Quarterly QI Drill
		Yes ☐ No ☐	Quarterly QI Drill
		Yes ☐ No ☐	Quarterly QI Drill
		Yes ☐ No ☐	Quarterly QI Drill
		Yes ☐ No ☐	Quarterly QI Drill
		Yes ☐ No ☐	Quarterly QI Drill
		Yes ☐ No ☐	Quarterly QI Drill
		Yes ☐ No ☐	Quarterly QI Drill
		Yes ☐ No ☐	Quarterly QI Drill

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.

FIGURE A.2-1 - TRAINING REQUIREMENTS

TRAINING TYPE	TRAINING CHARACTERISTICS
Training in use of spill response plan	• 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	• 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
Incident Management Team personnel training	• See recommended PREP Training Matrix (FIGURE A.2-2)
Training for casual laborers or volunteers	• Company will not use casual laborers/volunteers for operations requiring HAZWOPER training
Wildlife	• Only trained personnel approved by USFWS and appropriate state agency will be used to treat oiled wildlife
Training documentation and record maintenance	• 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 maintained in the Training/Exercise tool in the electronic interface and at the Facility office

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 firefighting 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: ● 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 Incident Management Team (IMT) 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

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 the Plan	x	x	
OSHA requirements for worker health and safety (29 CFR 1910.120)	x	x	x
Incident Management 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 IMT		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: - 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: - Tank overfill - Tank rupture - Piping or pipeline rupture - Piping or pipeline leak, both under pressure or not under pressure, if applicable - Explosion or fire - Equipment failure - Failure of secondary containment system			x
QI's name and how to contact him or her			x

APPENDIX B CONTRACTOR RESPONSE EQUIPMENT

Last revised: January 29, 2009

B.1 Cooperatives and Contractors

B.1.1 OSRO Classification

Figure B.1-1 - Evidence of Contracts and Equipment Lists

B.1 COOPERATIVES AND CONTRACTORS

The Company has contracted with additional 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.

The following is a listing of the USCG classified OSROs that may respond to incidents for areas listed in this Plan. For a detailed listing of USCG classified OSROs and other contractors by terminal, refer to FIGURE 3.1-3 and 7.1-1.

COMPANY / CONTRACTOR	APPLICABLE COTP ZONE (S)	USCG CLASSIFICATIONS								RESPONSE TIME	
Acme Products Company, Inc. 2666 North Darlington Tulsa OK 74158	Saint Louis		Facilities				Vessels				4 hours
			MM	W1	W2	W3	MM	W1	W2	W3	
		River/Canal	✓				✓				
		Inland	✓				✓				
		Open Ocean									
		Offshore									
		Nearshore									
		Great Lakes									
			Facilities				Vessels				
Veolia Special Services (Subcontracted by ACME) Ponca City OK	Memphis		MM	W1	W2	W3	MM	W1	W2	W3	4 hours
		River/Canal		✓	✓	✓	✓	✓	✓	✓	
		Inland	✓				✓				
		Open Ocean	✓								
		Offshore									
		Nearshore									
		Great Lakes									
			Facilities				Vessels				
		Environmental Restoration (Subcontracted by ACME) Denver CO	Saint Louis		MM	W1	W2	W3	MM	W1	
River/Canal							✓				
Inland	✓						✓				
Open Ocean	✓										
Offshore											
Nearshore											
Great Lakes											
	Facilities				Vessels						
Haz-Mat Response (Subcontracted by ACME) Great Bend KS	Saint Louis				MM	W1	W2	W3	MM	W1	W2
		River/Canal			✓	✓	✓		✓	✓	
		Inland	✓				✓		✓		
		Open Ocean			✓						
		Offshore									
		Nearshore									
		Great Lakes									
			Facilities				Vessels				

The following contractors are retained by the Company, but are not USCG classified OSROs within this Area:

FIGURE 8.1-1 provides evidence of contracts with OSROs and equipment lists for contractors without USCG classification. **FIGURE 7.1-1** provides local response contractor's equipment lists and response times.

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

- z Acme Products Company, Inc., Tulsa, OK
- z Environmental Restoration (Subcontracted by ACME),
Denver, CO
- z Haz-Mat Response (Subcontracted by ACME), Great
Bend, KS
- z Veolia Special Services (Subcontracted by ACME), Ponca
City, OK
- z

White Cliffs Pipeline L.C.
11501 South 1-44 Service Road
Oklahoma City, OK 73173

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MASTER SERVICE AGREEMENT

NO. _____

VENDOR HEREBY ACKNOWLEDGES THAT HE HAS READ AND UNDERSTANDS ITS OBLIGATIONS UNDER THE **INDEMNITY** INSURANCE PROVISIONS IN SECTIONS 15 AND 16 ON THE ATTACHED PAGES. (INITIALS)

On 2007 White Cliffs Pipeline, L.L.C., 11501 South 1-44 Service Road, Oklahoma City, OK 73173, hereinafter called COMPANY.

And A(1000 ?t-o;).. S Co ", hereinafter called VENDOR, in consideration of their respective obligations to each other in this Contract, agree that:

1. **EXPRESS TERMS:** This Contract contemplates that COMPANY may from time to time request that VENDOR perform services and provide related materials on a nonexclusive basis under these written terms which shall determine the rights of the parties regardless of contrary terms in any rate schedules or other documents which may flow from this Contract's performance. This Contract may be amended only in writing and signed by an authorized representative of each party. COMPANY disclaims any unsigned amendments, alterations, or modifications.

2. **ORDERS AND PRICES:** Orders for services placed by COMPANY verbally with VENDOR shall be governed exclusively by the terms of this Contract and shall be priced based solely on the rates and prices then on file with COMPANY's Purchasing Department at COMPANY's Headquarters Office ("On File Rates"). Orders for services that vary the terms of this Contract or are at rates or prices other than the On File Rates may only be placed in a written Order signed by COMPANY substantially in the form of the sample "MSA Release Order" attached to this Contract.

3. **ACCEPTANCE:** Acceptance of this written Contract by COMPANY shall be valid only when it has been signed by COMPANY. Acceptance by vendor may be accomplished by delivery to COMPANY of a signed Contract or, after receipt by Vendor of a COMPANY signed Contract, by performance of any service or shipment of any materials provided for in this Contract.

4. **INDEPENDENT CONTRACTOR:** COMPANY shall have no power or authority to direct, supervise or control employees of VENDOR, and VENDOR shall, in the exercise of its independent employment, select the means, manner and method of performance of such work, being responsible to COMPANY solely for obtaining results in compliance with this Contract.

5. **SHIPMENT AND DELIVERY OF MATERIALS:** VENDOR shall be responsible for proper packaging, labeling and preparation for shipment and all labeling shall be in full compliance with all DOT, OSHA, and TOSCA labeling requirements. VENDOR shall include with each shipment or delivery a Material Safety Data Sheet for each item for which a Material Safety Data Sheet is required by applicable law or regulations.

6. **QUANTITY:** COMPANY shall be obligated to purchase and accept only the quantity of materials, goods, or services required for work under this Contract and any excess materials or goods may be returned to VENDOR at VENDOR's expense. In the event force majeure diminishes the quantity of available materials, goods, and services, VENDOR shall provide COMPANY with at least the portion of materials, goods and services available that COMPANY would receive under a fair and equitable allocation among COMPANY and VENDOR's other customers with written contracts.

7. **INSPECTION AND REJECTION:** VENDOR shall not substitute any material that has not been specified with authority from COMPANY. All material furnished will be subject to COMPANY's right of inspection and approval after delivery. COMPANY reserves the right (payment notwithstanding) to reject and return, at VENDOR's risk and expense, that portion of any shipment which may be defective or fails to comply with specifications. Neither acceptance, nor payment by COMPANY, nor its inspection, nor its failure to inspect limits or excludes VENDOR's express warranties, nor any warranties implied by law or waives any of COMPANY's rights or remedies.

8. **WARRANTY:** VENDOR expressly warrants (a) that each and all of the materials, goods, and services furnished under this Contract are free from defects in design, workmanship and materials; (b) that unless otherwise specified all such materials and goods and their components are new and have not been previously used; (c) that all such materials and goods as well as their ordinary intended purposes and /or any purposes specified are suitable for uses intended by COMPANY; (d) that each and all of such materials and goods, as well as VENDOR's services, and their sale to and use by COMPANY will not constitute infringement or contributory infringement of any patent or infringement of any copyright or trademark, or violation of any trade secret; and (e) to furnish all materials, labor, licenses, permits and other things necessary for performance, and otherwise perform expeditiously and in a good and workmanlike manner.

9. **CONSIDERATION, INVOICING AND PAYMENT:**

- (a) Unless otherwise negotiated and accepted by COMPANY, the consideration to be paid VENDOR by COMPANY for services performed and/or material furnished shall be at rates, which are on file with COMPANY at the time those services, or materials are requested under this Contract. For changes in rates to be binding on COMPANY, such changes must be in writing and must be received by COMPANY at least thirty (30) days before their effective date.
- (b) No payment is due VENDOR under this CONTRACT before services have been performed to COMPANY's satisfaction, and related materials have been received and accepted by COMPANY. Payment will then be made against VENDOR's proper invoice. All invoices must refer to this Contract and shall include sufficient detail and supporting documents (including original bill of lading and/or express bills for shipment invoices) for COMPANY to reasonably determine the basis of the charges. Invoices submitted for services charged on an hourly basis shall be supported by documents that have been signed as approved by appropriate COMPANY personnel showing description, date, and location of services performed and the names of employees and hours each worked. Transportation charges paid by VENDOR for COMPANY's account must be shown separately on invoices and be supported by a receipt or bill if transportation charges exceed \$50. VENDOR shall not charge tax on transportation. COMPANY reserves the right to withhold any money payable by it under this Contract and to apply it to payment of any obligations of VENDOR to COMPANY or to any other party which may arise in any way out of this Contract or its performance.

10. **WORK DOCUMENTS:** All specifications, designs and technical data, reports, blueprints, drawings, patterns, etc. ("Work Documents"), customized tooling and dies prepared or constructed by VENDOR pursuant to this Contract shall be COMPANY's property and shall be released to COMPANY upon the completion of deliveries hereunder or upon the cancellation of this Contract for any reason. All "Work Documents" and any other information or materials not already in the public domain, shall remain the proprietary and confidential information of COMPANY and shall not be disclosed to any third party without the prior written consent of COMPANY.

11. **TERMINATION:**

(a) For Convenience: COMPANY reserves the right to terminate this Contract, or any part of it, for any reason and at any time by giving VENDOR written notice; and

- i. Upon notification of termination for COMPANY's convenience VENDOR shall protect all property in possession in which COMPANY has an interest, shall terminate all work and commitments made under or pursuant to this Contract as quickly and effectively as possible, and shall provide COMPANY written proof that such termination has been accomplished in a timely manner.
- ii. COMPANY shall pay VENDOR that percentage of the price corresponding to the percentage of the work performed prior to the notice of termination less all amounts previously paid, plus actual direct cost reasonably necessitated by the resulting termination; and
- iii. VENDOR shall not be paid for any work done after receipt of notice of termination, for any costs incurred by VENDOR's suppliers or subcontractors which VENDOR could reasonably have avoided, or for any other amounts not explicitly provided for in this section. VENDOR shall, if so directed by COMPANY, ship to COMPANY all materials, which COMPANY shall have paid for.

(b) For Default: Each of the following events shall constitute a default by VENDOR for purposes of this Contract:

- (1) any proceedings or acts by or against VENDOR which in COMPANY's reasonable judgment render VENDOR financially insecure with respect to this Contract;
- (2) refusal or failure of VENDOR to deliver the goods or perform the services in accordance with the specified delivery schedule or within a reasonable time if no schedule is specified;
- (3) failure to make progress so that performance of this Contract in accordance with its terms is endangered; or
- (4) failure to perform any other provision of this Contract.

If VENDOR does not cure any default within a period of ten (10) days after notice thereof, or such longer period as COMPANY may authorize in writing, then COMPANY may by written notice to VENDOR, terminate this Contract or any part of it. In the event of termination for default, COMPANY shall not be liable to VENDOR for payment of any amount other than for the value of any shipment of goods received and not returned to VENDOR by COMPANY and VENDOR shall be liable to COMPANY for any and all damages or claims sustained by reason of the default which gave rise to the termination.

Termination by COMPANY for any reason shall not prejudice any claim for damages or nonperformance COMPANY would otherwise have against VENDOR. The rights and remedies of COMPANY set forth in this Contract are not exclusive and are in addition to all other rights and remedies of COMPANY.

12. **FORCE MAJEURE:** Either VENDOR or COMPANY shall be excused from performing its obligations under this Contract when and only to the extent that performance is delayed or prevented by any circumstances reasonably beyond its control, including but not necessarily limited to, any strike or labor dispute, any act or omission by any government authority, explosions, fire, riot, war, or in COMPANY's case, its need for the services or materials being reduced. Whenever any such event shall occur, the party prevented from performing its obligation must give written notice of that event to the other party as soon as possible.

VENDOR shall deliver to COMPANY satisfactory releases, satisfactions or waivers of all claims, liens and claims for liens connected with performance under this Contract if requested to do so by COMPANY. Final payment to VENDOR shall not relieve VENDOR of its obligation to discharge any lien filed before or after VENDOR is paid for services under this Contract.

14. COMPLIANCE WITH LAW AND COMPANY'S SAFETY REQUIREMENTS: VENDOR represents and agrees that it will fully comply with all Federal, State and Local laws, ordinances, codes, rules, regulations, and standards applicable to VENDOR's performance of this Contract, specifically including, but not limited to:

- (a) laws pertaining to the employment of VENDOR's employees including payment of all Federal, State, and local taxes or contributions and required withholdings;
- (b) laws relating to the training, health and safety of VENDOR's employees including all regulations and standards promulgated under the Occupational Safety and Health Act of 1970, as amended;
- (c) laws relating to the protection of the environment including those related to the transportation or disposal of waste and the transportation, use or disposal of hazardous or toxic substances.
- (d) EEO: Federal, State and local laws relating to equal employment and benefits, including but not limited to the following when this Contract meets or exceeds the threshold consideration or other requirement that is used in each instance: (1) If this Contract is \$2,500 or more: Affirmative action for Handicapped Workers (41 C.F.R Section 60-741.4); (2) If this Contract is \$10,000 or more: Certification of Non-segregated Facilities (41 C.F.R. Section 60-1.8), Affirmative Action for Special Disabled and Vietnam Era Veterans (41 C.F.R. Section 60-250), Utilization of Small Business Concerns and Small Disadvantaged Business Concerns (41 C.F.R. Section 1-1.710.3(a)), Utilization of Woman-Owned Small Businesses (Executive Order 12138); (3) If the aggregate value of the contracts in any 12-month period exceeds or can reasonably be expected to exceed \$10,000: Equal Opportunity Clause (41 C.F.R Section 60-1.4); (4) If this Contract exceeds \$25,000: Utilization of Labor Surplus Concerns (41 C.F.R. 1-1.705-3(a)); (5) If VENDOR has 50 or more employees and the aggregate value of contracts in any 12-month period can reasonably be expected to exceed \$50,000: Affirmative Action Compliance Programs (41 C.F.R. Section 60-1.40); (6) If this Contract may exceed \$100,000: Labor Surplus Area Subcontracting Program (41 C.F.R. Section 1-1.705-3(a)); (7) If this Contract is expected to exceed \$500,000 (\$1,000,000 for construction of any public facility): Small Business and Small Disadvantaged Business Subcontracting Plan (48 C.F.R. Section 52.219-9); (8) All other applicable sections contained in 41 C.F.R. Chapter 60.

In addition, VENDOR agrees to fully comply with all safety and security policies, standards, and procedures of the COMPANY, which include drug and alcohol abuse policies applicable to COMPANY property.

15. INDEMNITIES:

and its and their officers, directors, agents, employees and invitees as follows:

(i) VENDOR's Fault or Negligence: Except as to matters within the scope of (ii) immediately below, VENDOR shall defend, indemnify, and hold COMPANY harmless from and against all liability, costs, expenses, damages, claims, suits or demands arising out of or related to injury, illness, or death of any persons and loss or damage to any property, including COMPANY's property, occurring in connection with or from the performance or nonperformance of this Contract to the extent of VENDOR's fault or negligence;

(ii) VENDOR's Employees and Agents: (The following provisions do not apply to services rendered within the jurisdiction of the courts of the State of Louisiana and which are of the types described in Louisiana's Revised Statutes Section 9:2780, et seq., or its successors) As to any services or operations within the scope of this Contract, VENDOR shall unconditionally indemnify and hold COMPANY harmless from and against all liability, costs, expense, damages, claims, suits, or demands (whether or not there is any basis in law or in fact for same and including, but not limited to, those for bodily injury, illness, disease, or death, or loss of services or wages) because of accidents, damages, or injuries to the persons of VENDOR or VENDOR's servants, agents, and employees brought against COMPANY or any other party indemnified hereunder, if any, or in which COMPANY (or any other party indemnified hereunder, if any) is named as a party defendant by any employee, agent, servant, or subcontractor of VENDOR, regardless of whether or not any such claim, suit or demand shall arise in whole or in part from any sole or concurrent fault or negligence of COMPANY or any other indemnified party hereunder, if any, including, but not limited to any negligent act or omission of COMPANY, or any other party hereunder, if any, or their respective officers, agent, or employees. VENDOR shall defend any and all such claims and suits at its sole expense and shall bear all other costs and expenses related thereto, but may investigate, negotiate and settle any such claims or suit as it deems expedient.

Liability of VENDOR under the indemnity and hold harmless provisions of this Contract, or otherwise at law, shall not be limited to or by the insurance VENDOR is required to provide under this Contract

(b) COMPANY's Indemnities: COMPANY shall defend, indemnify and hold harmless VENDOR, its subsidiaries, affiliates, co-owners and joint ventures and its and their officers, directors, agents, employees and invitees as follows:

(i) COMPANY's Fault or Negligence: Except as to matters within the scope of (ii) immediately below, COMPANY shall defend, indemnify and hold VENDOR harmless from and against all liability, costs, expenses, damages, claims, suits or demands arising out of or related to injury to, illness or death of any person and loss or damage to any property, including VENDOR's property, occurring in connection with or from the performance or nonperformance of this Contract to the extent of COMPANY's fault or negligence;

do not apply to services rendered within the jurisdiction of the courts of the State of Louisiana and which are of the types described in Louisiana Revised Statutes Section 9:2780, et seq., or its successors) As to any services or operations within the scope of this Contract, COMPANY shall unconditionally indemnify and hold VENDOR harmless from and against all liability, costs, expense, damages, claims, suits, or demands, (whether or not there is any basis in law or in fact for same and including, but not limited to, those for bodily injury, illness, disease, or death, or loss of services or wages) because of accidents, damages, or injuries to the persons of COMPANY or COMPANY's servants, agents, and employees brought against VENDOR (or any other party indemnified hereunder, if any) or in which VENDOR (or any other party indemnified hereunder, if any) is named as a party defendant by any employee, agent, servant, or successor of COMPANY, regardless whether or not any such claim, suit or demand shall arise in whole or in part from any sole or concurrent fault or negligence of VENDOR or any other party indemnified hereunder, if any, including, but not limited to, any negligent act or omission of VENDOR any other party indemnified hereunder, if any or their respective officers, agents or employees. COMPANY shall defend any and all such claims and suits at its sole expense and shall bear all other costs and expenses related thereto, but may investigate, negotiate and settle any such claim or suit as it deems expedient.

(c) The indemnities in this Contract cover recovery of all expenses, which may be incurred by the indemnitee including attorney's fees and costs, but exclude consequential damages. The indemnities in this Contract are limited to the extent necessary to comply with any applicable State or Federal law and this Contract is deemed to be amended so as to comply with those laws to the extent their requirements are at variance with these Terms and Conditions.

16. **INSURANCE:** VENDOR agrees to procure and maintain, and shall require its contractors and/or subcontractors to procure and maintain insurance coverage with reputable insurers acceptable to COMPANY in the kinds and amounts as set forth below:

- (a) Worker's Compensation Insurance, including Occupational Disease coverage, shall be in accordance with the benefits afforded by the statutory Worker's Compensation Acts applicable to the State, Territory or District of hire, supervision or place of accident and including, when applicable, full coverage for maritime obligations; the United States Longshoremen's and Harbor Workers Compensation Act; Outer Continental Shelf Lands Act; the Jones Act; and Death on the High Seas Act. (Sole proprietorships with no employees falling within the jurisdiction of any statutory Worker's Compensation Act must so certify to Company in writing.)
- (b) Employer's Liability Insurance in an amount not less than \$500,000 each accident, \$500,000 disease each employee, and \$500,000 disease policy limit, except for offshore work or other work entailing maritime or the United States Longshoremen's and Harbor Worker's Compensation Act Obligations, in which case limits shall be carried of not less than \$1,000,000 each accident, \$1,000,000 disease each employee, and \$1,000,000 disease policy limit.
- (c) Commercial General Liability Insurance with a single limit of liability for bodily injury or property damage of \$1,000,000. Such coverage shall

include products/completed operations liability, explosion, collapse and underground damage liability (XCU); contractual liability covering the obligations assumed by VENDOR herein; and when requested in writing by COMPANY, sudden and accidental pollution liability with respect to VENDOR and its Contractors and Subcontractors.

- (d) Automobile Liability Insurance covering all owned, non-owned and hired motor vehicles used in the performance of this Contract, with limits of not less than \$500,000 combined single limit.
- (e) When requested by COMPANY, Excess Liability Insurance with limits of not less than \$2,000,000 per occurrence and in the aggregate providing additional limits of insurance to the coverage described in paragraphs (b) (c) and (d) above.
- (f) Aircraft Liability Insurance covering all owned, non-owned, or hired aircraft used in connection with the performance of this Contract with limits of not less than \$5,000,000 per occurrence; Protection and Indemnity Insurance including excess collision liability with a minimum limit of \$5,000,000 per occurrence; as well as Hull and Machinery Insurance, including full collision liability, in an amount equal to the fair market value of each vessel that is owned and/or chartered by VENDOR and used in connection with the performance of the Contract.

It is understood and agreed that the insurance requirements set forth in this section shall in no way limit VENDOR's liability under this Contract nor shall they be construed to be the ultimate types and amounts of insurance VENDOR should maintain to adequately cover itself from the hazards of its occupation.

It is further expressly agreed by VENDOR that any and all deductibles in the above insurance policies shall be assumed by, for the account of, and at VENDOR's sole risk.

All policies of insurance referred to herein, with the exception of Workers' Compensation and Employer's Liability Insurance shall name COMPANY as an additional insured with respect to the work performed under this Contract. Further, all of the above insurance policies shall contain provisions that no cancellation or material change shall become effective except on thirty (30) days written notice to COMPANY.

Except where prohibited by law, all policies of insurance pertaining to work performed under this Contract which are procured, held or maintained by VENDOR and each of its contractors and/or subcontractors, whether required by this Contract or not, shall be endorsed to provide that the underwriters or insurers waive any and all rights of subrogation against COMPANY, its co-owners, and joint venturers, and its and their officers, directors, agents, employees and invitees.

Prior to work commencing under this Contract, VENDOR shall provide to COMPANY Certificates of Insurance for itself and each of its contractors and/or subcontractors signed by an authorized representative evidencing the coverages, limits, endorsements and extensions required herein.

17. TAXES: The On File Rates and written orders and quotes provided pursuant to this Contract shall be deemed to include all applicable sales and excise taxes unless the documents evidencing same expressly state that the prices quoted are exclusive of sales and excise taxes. Where prices are quoted as exclusive of such taxes, the applicable taxes shall be invoiced by VENDOR as a separate line item unless COMPANY presents evidence of exemption from the applicable tax. VENDOR shall indemnify and hold COMPANY harmless from any liability and expense by reason of VENDOR's failure to pay such taxes.

18. **AUDIT:** VENDOR agrees that all records pertaining to charges made to COMPANY under this Contract are subject to audit by representatives of COMPANY. VENDOR will retain supporting records, including payroll registers, canceled payroll checks, 1099 forms and the like, for minimum period of three (3) years from the date of completion of all work under this Contract.

19. **ANTIKICKBACK:** VENDOR represents that no consideration, kickbacks, fees, payments or things of value above what is ordinarily encountered in usual and customary business practices and what is permitted by any applicable antikickback law, were given to or requested by any COMPANY employee as an inducement to enter into or continue this Contract, and that VENDOR further agrees to immediately report any such request, demand or occurrence by any COMPANY employee to: Office of General Counsel, White Cliffs Pipeline, L.L.C., 11501 South 1-44 Service Road, Oklahoma City, Ok 73173; Telephone (405) 691-5016; Facsimile (405) 691-5192.

20. **ASSIGNMENT:** This Contract shall be binding on the parties, their successors, and assigns. VENDOR shall not assign this Contract without prior written approval of COMPANY.

21. **CHOICE OF LAW:** COMPANY HAS ITS HEADQUARTERS IN OKLAHOMA AND THE PARTIES AGREE THAT THIS CONTRACT SHALL BE INTERPRETED AND CONTRUED IN ACCORDANCE WITH THE INTERNAL LAWS OF THE STATE OF OKLAHOMA

22. **ENTIRE AGREEMENT:** This Contract supersedes and cancels all prior agreements or understandings (written or oral) between VENDOR and COMPANY in respect of the services and related materials to be provided by VENDOR to COMPANY under this Contract.

White Cliffs Pipeline, L.L.C.

By: Peter L. Schwiering
(Signature)

Peter L. Schwiering

President

[Signature]
(Witness Signature)

VENDOR:

By: [Signature]
(Signature)

David Pollard

Printer/Typed Name)

Vice President

(Title)
[Signature]
(Witness Signature)



Acme Products

2666 N. DARLINGTON
TULSA, OKLAHOMA 74115
PHONE: (918) 836-7184 • FAX: (918) 836-9197

OIL SPILL RESPONSE RATES AND
POLICIES Effective Date: January 1,
2008

PERSONNE

L			StraightTime
Laborer			
.....			\$25.00/1-
hour	Spill		Technician
.....			\$38.00/1-hour
Equip1nent			Operator
.....			\$38.00/1-hour Fore1nan
.....			\$50.00/Hour
Supervisor			
.....			\$60.00/Hour

Labor rates computed as follows:

Straight Time: Week Days, 8:00AM to 4:00PM

Time and One-Half: Week Days, 4:00 PM to 8:00 AM,

Saturdays and Sundays- All Day

Double Time: Holidays - All Day

* Emergency Deliveries@ \$2.00 per mile- one way.

Minimum four-hour labor charge

Charge for subsistence outside 50-mile radius ofTulsa, OK

.....\$105.00/Day/Employee

Charge for P.P.E., Respirators, and hand tools\$
45.00/Day/Employee

RENTAL POLICY

Minimum rental of one day on daily rated equipment

VEHICLES, BOATS AND TRAILERS

Four-Wheel Drive

.....\$100.00/Day Pickup

Truck\$

75.00/Day Stake Body Truck (1 1/2 Ton)

.....\$125.00/Day Cargo Van Truck

(16'- 24')\$150.00/Day

16' Boat with Outboard Motor\$200.00/Day

12' Boat with Outboard Motor

.....\$150.00/Day Response Trailer, 20'

Van W/Spill Response Equipment.....\$300.00/Day Delivery

Trailers\$ 75.00/Day

Four Wheeler (ATV) with Trailer

.....\$225.00/Day

RECOVERY EQUIPMENT AND ACCESSORIES

Oil Containment Boom- Acme "O.K. Corral" \$1 ..40/Ft/Day

Danforth Anchors with Mooring and Marker Buoys
\$150.00/Set/Spill

(If not retrievable, cost=
\$598.50/Set)

Acme Super Mini Boom (2 1/2" Float x 4" Skirt) \$.75/Ft/Day

Boom Cleaning (Depending on type of contaminates) \$
.60/Ft.- .90/ft

SKIMMERS, PUMPS, ETC.

Drum Skimmer w/ Air Compressor						\$500.00/Day
Acme	FS400ASK-39T	Powered		Acme	FSV-39T	Skimmer
			\$200.00/Day			Vacuum
Skimmer					150.00/Day	Acme Mop
Skin11ner						\$300.00/Day
Acme	Drum	Skimmer	With	Power		Pack
			\$500.00/Day	Acme	FS150A-39G4	Floating
Washdown Pump			\$125.00/Day	Honda	High Pressure	
Pumps- Washdown/Decon			\$150.00/Day	Honda	3"	
Contractors Trash Pump			\$150.00/Day			
Backpack Blower						\$
75.00/Day						
3" Suction Hose W/Fittings						\$
2.50/Ft/Spill						
2" Suction Hose W/Fittings						\$
1.50/Ft/Spill						
1 1/2" Suction Hose W/Fittings						\$
1.25/Ft/Spill						
Trailer	Mounted			High		Pressure
Washer			\$300.00/Day			

MISCELLANEOUS EQUIPMENT

Trailer	Mount			Generator		
			\$175.00/Day	Generator with		
Floodlights			\$175.00/Day			
Personnel- Decon Pool			\$1			
00.00/Day	Equipment-	Decon		Poi		
			\$350.00/Day	Portable		
Radio(s) and Cellular Phone(s)			\$	45.00/Day		
Chainsaw, Weed eater, Brush Cutter			\$			
75.00/Day Propane Burn Units			\$			
(Torch, 25' hose, regulator & 20# Fuel Cylinder)			50.00/Day			
20/30 Gallon Pollution Cans			\$			
15.00/Spill	D.O.T.	Poly	Overpack	Drums		
			\$190.00/Spill	Life	Jacket(s)	
			\$		25.00/Spill	
Boots, 1-fip			\$			
50.00/Spill		Boots,		Chest		
Wader			\$	95.00/Spill		
LELand Draeger Monitoring Equipment			\$			
50.00/Day						

MISCELLANEOUS MATERIALS

Polypropylene Rope, 1/4" x 1000' Roll		\$
60.00/Roll Polypropylene Rope, 1/2" x 1000' Roll		
	\$180.00/Roll Polypropylene Rope, 5/8" x 600'	
Roll	\$180.00/Roll Rags (25# Box)	
	\$ 35.00/Box	
Polyethylene Sheeting-Visqueen		
	\$125.00/Roll Heavy Duty Polyethylene	
Trash Bags	\$	1.75/Each
Propane		\$
		2.00/Poun
d Heavy-Duty Metal Stakes		\$ 1
0.00/Each		

CLEANING EQUIPMENT: Cleaning Contaminated Equipment will be 1/4 to 112 Daily Rental Rate per Unit

STAND BY RATE: Negotiated based on circumstances

SORBENTS: Sorbents will be charged according to Acme's published spill list prices- (Available upon request)

OUTSIDE EQUIPMENT RENTAL

A 20% handling charge is added to any equipment, materials or service which we subcontract, purchase, or rent that is not listed on this rate sheet.

DISPOSAL

Disposal of waste products is the responsibility of the customer. However, upon customer request, transport/disposal of waste products can be arranged by Acme Products. A 20% handling fee will be added to any outside contractor, transportation or disposal site charges.

TERMS:

Invoices will be rendered either **on a daily basis or at the completion of the individual job, depending on the** duration of the

All rental sell charges, service charges, prepaid cartage, etc. are payable NET CASH within ten (10) days from date of invoice. FINANCE CHARGES computed by a "PERIODIC RATE" OF ONE AND ONE-HALF PERCENT (1-1/2%) PER MONTH (18%) PER ANNUM, will be applied to any unpaid balance beginning thirty (30) days from invoice date. Should it become necessary to employ an attorney to collect any unpaid balance of an invoice, customer agrees to pay the fee of such attorney. Such fee is hereby fixed at twenty-five percent (25%) of the amount due or One Hundred Dollars (\$100.00), whichever is greater.

Experienced Acme Products Company personnel are available for operating equipment and for instructional purposes. Personnel and transportation charges as shown on cost schedule will apply.

These terms and conditions are to be considered an integral part of Acme Products Company oil spill reclaiming service price schedules.

CONDITIONS:

The renter of Acme Products Company equipment and services agrees that Acme Products Company is an independent contractor and that all work be done under the exclusive control and supervision of renter (hereinafter called customer) or his agent. The work area, premises about the area, ingress and egress routes in the area, and services provided by others are at all times in complete care, custody, and control of the customer or his agent. The customer shall provide all state and local permits of whatever governmental documentation or authority is required to perform the job.

A responsible representative of the customer must be present to designate work area and ascertain conditions, to the best of his knowledge, under which Acme Products Company services or products will be used. Because of uncertain or unknown conditions and incidental hazards under which services are rendered, Acme Products Company does not guarantee the results of the work, services, or products, and all services are rendered at the customer's risk.

It is agreed that Acme Products Company shall not be liable or responsible for any loss, damage, or injury to said work area or customer facilities resulting from the use of its tools, equipment or services, or from acts of any person engaged in doing such work. The customer agrees to protect, indemnify and hold Acme Products Company, its agents and employees harmless from claims, damages, or causes of action asserted by customer employees, or by any third parties for personal injury or property damage including, without limitation, damage to work area, customer facilities or third party property, in any way arising out of the rental of Acme Products Company accessories, or other equipment and from any services rendered except that Acme Products Company shall be liable for injury caused by its intentional misconduct.

Conditions at the work area which prevent operation of Acme Products Company equipment or change in plans by the customer do not relieve the customer of his responsibility for personnel, rental, or transportation charges. A minimum of four (4) hours time for each Acme Products Company personnel responding to customer's request (all as shown in current price schedule attached) will be charged.

No employee, agent or representative of Acme Products Company has authority to alter, extend, or exceed these terms except an officer of Acme Products Company. Should customer violate any of these terms and conditions, become bankrupt, insolvent, in receivership, or should any creditor or person levy customer's property or equipment, Acme Products Company shall immediately have the right without notice to retake and remove its equipment wherever it may be found.

EQUIPMENT RENTALS

Equipment and tools used will be charged for at the posted rental prices which are subject to change without notice. The customer's responsibility herein begins when tools or equipment leave Acme Products Company service point and continue until they are returned.

Tools or equipment obtained from outside sources are subject to the condition, warranties, if any, and prices established by suppliers. (Special tools ordered and built will be charged at applicable shop time, plus minimum rental, whether or not the tools are used).

MINIMUM RENTALS:

The renter of Acme Products Company equipment agrees to a minimum rental time of one (1) calendar day commencing when the equipment leaves the Acme Products Company service point. Rental time shall be invoiced to the customer until the equipment is returned to the Acme Products Company point or until the customer makes other arrangements with Acme Products Company for return of equipment.

/

PERSONNEL TIME:

All _____ will be _____ at the rates shown in the _____ price schedule. Time is charged when personnel leave Acme Products _____ service _____ and continues until they return, or where subsistence and lodging charges are in _____ from the time _____ leave their lodging until their return.

DAMAGE TO RECOVERY EQUIPMENT AND ACCESSORIES:

Ordinary wear and tear excepted, recovery equipment and accessories will be repaired at customer's expense.

LOSS OR DAMAGE BEYOND REPAIR OF PROTECTIVE CLOTHING, HAND TOOLS AND MISCELLANEOUS EQUIPMENT:

Loss or damage beyond repair of miscellaneous equipment will be charged at replacement costs less accrued rental fees. All equipment damaged beyond repair will be held up to ten days for the customer's inspection or disposition.

TAXES:

All federal, state or municipal taxes, except income and ad valorem taxes, now or hereafter imposed with respect to services rendered; to rental equipment; to the processing, manufacture, repair, delivery, transportation of merchandise or equipment shall be added to and become a part of the price payable by the customer.

INSURANCE:

Acme Products Company shall maintain at all times the following insurance, in amounts not less than those respectively specified: (a) Workmen's Compensation insurance complying with the laws of each state in which the work is to be performed, \$100,000/\$500,000/\$100,000; (b) Employer's liability insurance, \$500,000 combined single limit; (c) Automotive and general liability insurance, \$500,000 combined single limit; and shall furnish evidence satisfactory that such insurances are in effect.

RESPONSIBILITY FOR WORK:

Work in progress, including all property and charges for labor and rental equipment, shall be exclusive responsibility of the customer. If the customer obtains insurance protections against such risks or part thereof Acme Products Company and its insurers shall have full waiver of subrogation by the customer and customer's insurers, and such customer-obtained insurance shall bear all losses thereby insured against and up to the full amount of such insurance without any contribution by Acme Products Company or its insurer and without any proration of loss between the customer's insurer and Acme Products Company or its insurers. If requested, Acme Products company shall provide such insurance as hereinafter stated.

ADDITIONAL INSURANCE:

Acme Products Company agrees to use its best efforts to procure additional insurance or to increase the limits of the policies listed above if requested by the customer. However, the cost of any additional insurance is to be charged as outside services arranged by Acme Products Company and invoiced to the customer at Acme Products Company's cost plus 20%.

LIMITATIONS:

Acme Products Company obligation, if assumed, to indemnify customer from all claims, liabilities and causes of action based upon Acme Products Company's negligence or that of Acme Products Company's employees, agents or subcontractors shall be limited strictly to and shall not exceed Acme Products Company insurance coverage, which insurance coverage and its limitations and exclusion are explained hereinafter. Accordingly to the extent that the damage or destruction not be within the insurance cover, customer shall pay Acme Products Company for repairs or replacement at the rates set forth herein.

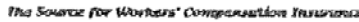
COMPANY

NAME:

AUTHORIZED

SIGNATURE:

DATE: _____



FORM UN6 AGT

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APPENDIX C HAZARD EVALUATION AND RISK ANALYSIS

Last revised: January 29, 2009

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- C.1 Spill Detection
 - C.2 Worst Case Discharge Scenario
 - C.3 Planning Volume Calculations
 - C.4 Spill Volume Calculations
 - C.5 Pipeline - Abnormal Conditions
 - C.6 Product Characteristics and Hazards

Figure C.6-1- Summary of Commodity Characteristics

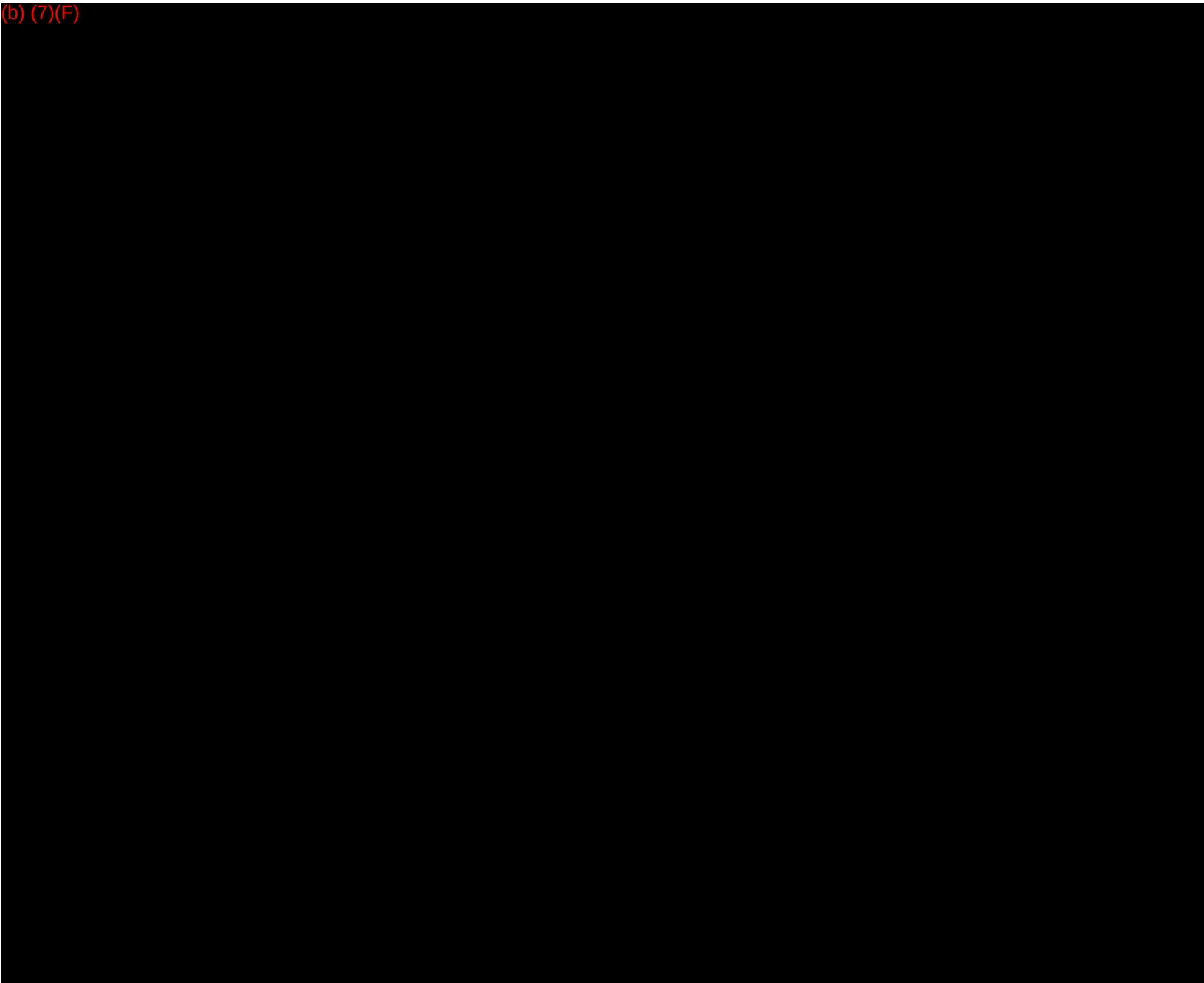
C.1 SPILL DETECTION

Detection

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

- Automated detection by the Supervisory Control and Data Acquisition (SCADA) system
- Visual detection by Company personnel
- Visual detection by the public

(b) (7)(F)



- Training

All operators are required to take computer-based training modules including hydraulic principals, fire protection, DOT Part 190, Subchapter D, by Company personnel and others.

Visual detection by Company personnel

Aerial patrol flights will be made on a regular basis. The intent of the patrol is to observe the area directly over the pipeline right-of-way for leaks, exposed pipes, washes, missing markers and other unusual conditions. Construction on either side of the pipeline right-of-way is also monitored.

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

- Notifications as per SECTION 3
- A preliminary assessment of the incident area
- If appropriate, initiate initial response actions per SECTION 2

FIGURE 2-1 provides a checklist for initial response actions.

Visual detection by the public

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

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

Pipeline shutdown

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

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

C.2 WORST CASE DISCHARGE (WCD) SCENARIO

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

APPENDIX C.4 provides worst case discharge calculations. Discussion of this scenario is as follows:

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

1. The First Responder would notify Supervisory Personnel and notifications would be initiated in accordance with FIGURE 2-1.
2. The Area Supervisor/Manager of Operations would assume the role of Incident Commander until relieved and would initiate response actions and notifications in accordance with SECTION 2. If this were a small spill, the local/company personnel may handle all aspects of the response. Among those actions would be to:
 - Conduct safety assessment in accordance with FIGURE 2.1-1 and evacuate personnel as needed in accordance with SECTION 2.3
 - Direct facility responders to shut down ignition sources
 - Direct facility personnel to position resources in accordance with SECTION 6.9
 - Complete spill report form in accordance with FIGURE 3.1-2
 - Ensure regulatory agencies are notified (FIGURE 3.1-3)
3. If this were a small or medium spill, the Qualified Individual/Incident Commander may elect for the First Responder to remain the Incident Commander or to activate selected portions of the Incident Management Team. However, for a large spill, the Qualified Individual 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 Incident Commander would then initiate spill assessment procedures including surveillance operations, trajectory calculations, and spill volume estimating in accordance with SECTION 2.1.3.
5. The Incident Commander would then utilize checklists in the SECTION 4.6 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 would develop the following plans, as appropriate (some of these plans may not be required during a small or medium spill):

• Site Safety and Health (SECTION 5.4) • Incident Action (SECTION 5.3.2) • Disposal (SECTION 5.6)	• Site Security (SECTION 5.7) • Decontamination (SECTION 5.5) • Demobilization (SECTION 5.8)
---	--

Plan templates are included in SECTION 5.

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

C.3 PLANNING VOLUME CALCULATIONS

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

C.4 SPILL VOLUME CALCULATIONS

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.

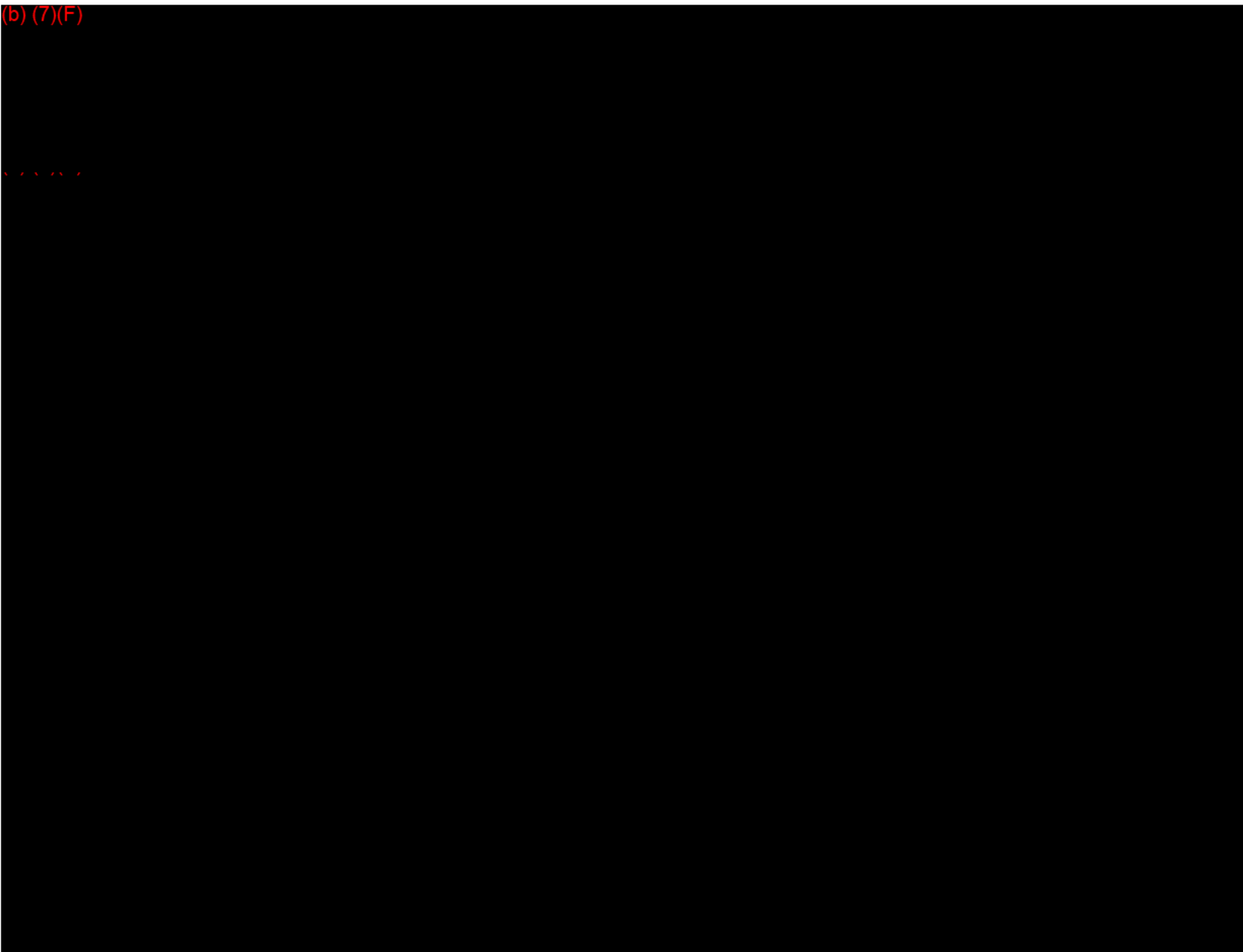
The worst case discharge for each response zone was based on the largest volume of the three criteria given above.

The Company has determined the worst case discharge volume to be a catastrophic line failure of the largest line section with the greatest drainage capacity or 25% of the volume of the largest tank in each zone.

ASSUMPTIONS

1. Only DOT Regulated Breakout Tanks are considered for the WCD. Non-regulated tanks at the same or other facilities are not considered.
2. Pipeline maximum release time is considered as time required to empty line segments at higher elevation than the release point if this volume were emptied while the line was operating at maximum flow rate.
3. Credits are only applied to breakout tank volumes in the WCD calculations.
4. No maximum historic discharge data available to use for Largest Foreseeable Discharge.
5. Pipeline Maximum Release Time is understood to be the maximum time required for detection of the

(b) (7)(F)



14. There is no tankage on the Tampa pipeline
15. Pipeline wall thickness varies on the WOT line and the WC line. The smallest wall thickness is used for these calculations to maximize volume.

DATA**Pipeline Maximum Release Time**

WOT Line – 0.166 HR (10 min)

WC Line – 0.166 HR (10 min)

Tampa Line – 0.166 HR (10 min)

Pipeline Maximum Shutdown Response Time

WOT Line – 0.166 HR (10 min)

WC Line – 3.166 HR (3 hr 10 min)

Tampa Line – 0.166 HR (10 min)

Maximum Daily Capacity of Pipeline

WOT Line – 60,000 BPD

WC Line – 72,000 BPD

Tampa Line – 36,000 BPD

Pipeline Maximum Flow Rate

WOT Line – 2,500 BPH

WC Line – 3,000 BPH

Tampa Line – 1800 BPH

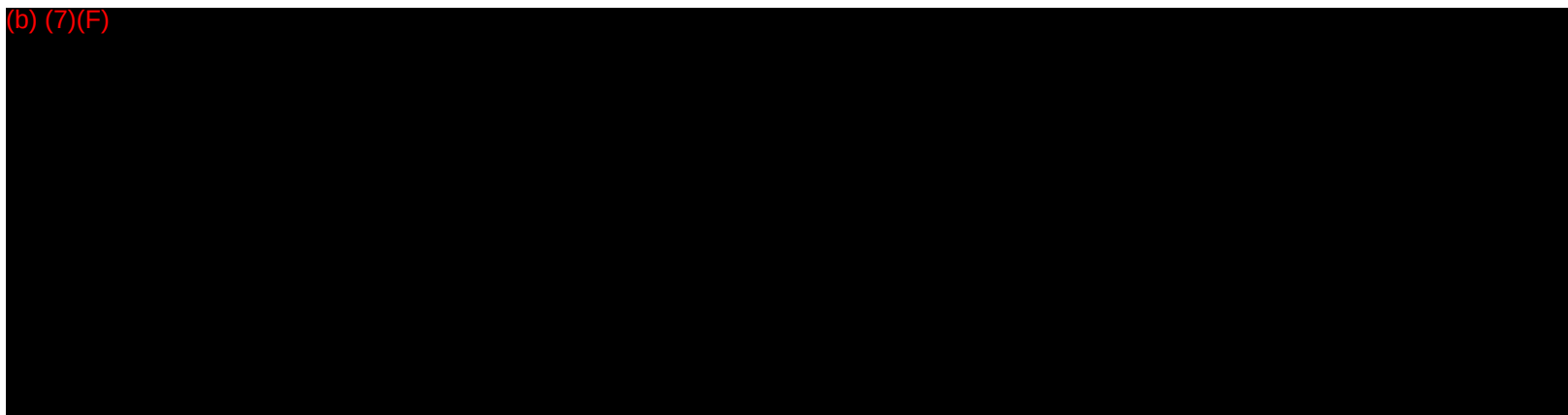
Largest Foreseeable Discharge, Based on the Maximum Historical Discharge

WOT Line – 0 BBL

WC Line – 0 BBL

Tampa Line – 0 BBL

(b) (7)(F)



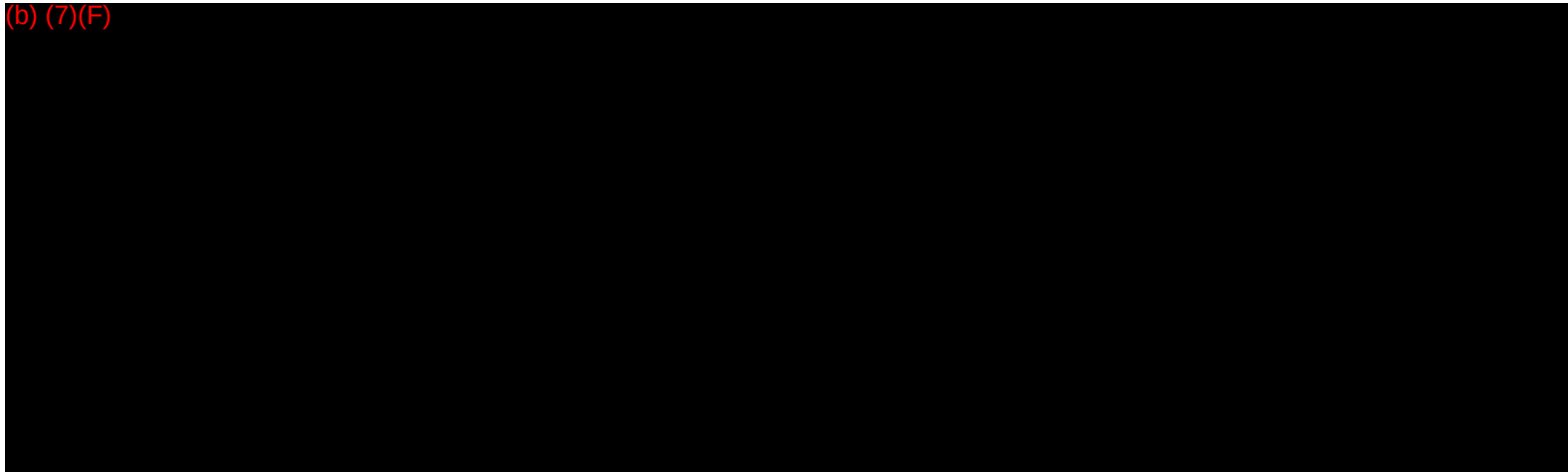
Credits that may be applied to the WCD for this spill response zone:

Prevention Measure	Standard	Credit (percent)	Applicable
Secondary Containment > 100%	NFPA 30	50%	50%
Built/Repaired to API Standards	API RP 620/650/653	10%	10%
Overfill Protection Standards	API RP 2350	5%	5%
Testing/Cathodic Protection	API RP 650/651/653	5%	5%
Tertiary Containment/drainage/treatment	NFPA 30	5%	0%
TOTAL		75%	70%

Note: Maximum allowable credit is 75%.

(b) (7)(F)

(b) (7)(F)



This spill response zone includes the Wattenberg Oil Trunkline, the White Cliffs Pipeline (Platteville to Sharon Springs), the Tampa Pipeline, Briggsdale Station Tankage, Wells Ranch Station Tankage, and Platteville Station Tankage.

C.5 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 System Integrity Plan.

C.6 PRODUCT CHARACTERISTICS AND HAZARDS

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

- Crude Oil

The key chemical and physical characteristics of each of these oils and/or other small quantity products/chemicals are identified in MSDS. MSDS can be obtained by the facility via the web at www.MSDSonline.com.

FIGURE C.6-1 describes primary oils handled.

FIGURE C.6-1 - SUMMARY OF COMMODITY CHARACTERISTICS

COMMON NAME	MSDS NAME	HEALTH HAZARD	FLASH POINT	SPECIAL HAZARD	REACTIVITY	HEALTH HAZARD WARNING STATEMENT
Crude Oil	Appropriate product name	1	3	C, H ₂ S	0	May contain benzene, a carcinogen, or hydrogen sulfide, which is harmful if inhaled; flash point varies widely
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 = Asphyxiate 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 D CROSS-REFERENCES

Last revised: January 2005

DOT / PHMSA Cross-Reference

OSHA Cross-Reference

DOT / PHMSA CROSS-REFERENCE

OPA 90 REQUIREMENTS (49 CFR 194)	LOCATION
Information Summary	
- For the core plan: - Name and address of operator	Figure 1-3
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
- For each Response Zone appendix: - Information summary for core plan	Section 1
QI names and telephone numbers, available on 24-hr basis	Figure 1-3
Description of Response Zone, including county(s) and state(s) in which a worst case discharge could cause substantial harm to the environment	Figure 1-3
List of line sections contained in Response Zone, identified by milepost or survey station or other operator designation	Figure 1-3
Basis for operator's determination of significant and substantial harm	Figure 1-3
The type of oil and volume of the worst case discharge	Appendix D
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	
Notification requirements that apply in each area of operation of pipelines covered by the plan, including applicable state or local requirements	Section 3
Checklist of notifications the operator or Qualified Individual is required to make under the response plan, listed in the order of priority	Section 3.1
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 3.1, Figure 3.1-3
Procedures for notifying Qualified Individuals	Figure 3.1-1, Section 4.5, Figure 4.5-1
Primary and secondary communication methods by which notifications can be made	Section 7.1.6

DOT / PHMSA CROSS-REFERENCE, CONTINUED

OPA 90 REQUIREMENTS (49 CFR 194)	LOCATION
- Information to be provided in the initial and each follow-up notification, including the following: - 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 3.1-2
Spill Detection and On-Scene Spill Mitigation Procedures	
Methods of initial discharge detection	Appendix C.1
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
- List of equipment that may be needed in response activities based on land and navigable waters including: - 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
Identification of the availability, location, and contact phone numbers to obtain equipment for response activities on a 24-hour basis	Figure 3.1-3, Appendix B
Identification of personnel and their location, telephone numbers, and responsibilities for use of equipment in response activities on a 24-hour basis	Figure 3.1-3, Appendix B
Response Activities	
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 4.5, Appendix B
Qualified Individual's responsibilities and authority, including notification of the response resources identified in the response plan	Section 4.5
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
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
- For each organization identified under paragraph (d), a listing of: - 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

DOT / PHMSA CROSS-REFERENCE, CONTINUED

OPA 90 REQUIREMENTS (49 CFR 194)	LOCATION
List of Contacts	
• List of persons the Plan requires the operator to contact	Figure 3.1-1
• Qualified individuals for the operator's areas of operation	Figure 1-3
• Applicable insurance representatives or surveyors for the operator's areas of operation	Figure 3.1-1
• Persons or organizations to notify for activation of response resources	Figure 3.1-1
Training Procedures	
• Description of training procedures and programs of the operations	Appendix A.2
Drill Procedures	
• Announced and unannounced drills	Appendix A.1
• Types of drills and their frequencies; for example: • 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 Incident Management Team (IMT) 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	
• Procedures to meet §194.121	Section 1.2
• Procedures to review plan after a worst case discharge and to evaluate and record the plan's effectiveness	Section 1.2, Appendix C
Response zone appendices	
Each response zone appendix would provide the following information:	
• Name and telephone number of the qualified individual	Figure 1-3
• Notification procedures	Section 3
• Spill detection and mitigation procedures	Section 2.1, Appendix C
• Name, address, and telephone number of oil spill response organization	Figure 3.1-1, Appendix B
• Response activities and response resources including: • 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 Incident Management Team for the first seven days of the response	Appendix A, Appendix B

DOT / PHMSA CROSS-REFERENCE, CONTINUED

OPA 90 REQUIREMENTS (49 CFR 194)	LOCATION
Names and telephone numbers of federal, state, and local agencies which the operator expects to assume pollution response responsibilities	Figure 3.1-3
Worst case discharge volume	Appendix C
Method used to determine the worst case discharge volume, with calculations	Appendix C
- A map that clearly shows: - Location of worst case discharge - Distance between each line section in the Response Zone: - 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	Figure 1-4, Section 6.6, Section 6.7
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
- For every oil transported by each pipeline in the response zone, emergency response data that: - 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	Figure C.6-1

OSHA CROSS-REFERENCE

EAP REQUIREMENTS (29 CFR 1910.38 [a] [2])	LOCATION
Emergency escape procedures and emergency escape route assignments	Section 2
Procedures to be followed by employees who remain to operate critical plant operations before they evacuate	N/A
Procedures to account for all employees after emergency evacuation has been completed	Section 2
Rescue and medical duties for those employees who are to perform them	Section 2
The preferred means of reporting fires and other emergencies	Section 2, Figure 3.1-1
Names of regular job titles of persons or departments who can be contacted for further information or explanation of duties under the plan	Figure 3.1-3, Section 4.6

ERP REQUIREMENTS (29 CFR 1910.120 [I] [2])	LOCATION
Pre-emergency planning	Appendix C
Personnel roles, lines of authority, and communication	Section 4.4, Section 4.6, Section 7.1.6
Emergency recognition and prevention	Section 2
Safe distances and places of refuge	Section 2
Site security and control	Section 5.6, Section 7.2
Decontamination procedures which are not covered by the site safety and health plan	Section 5.4
Emergency medical treatment and first aid	Section 2
Emergency alerting and response procedures	Section 3
Critique of response and follow-up	Section 8.3
PPE and emergency equipment	Section 7, Appendix B

APPENDIX E ACRONYMS AND DEFINITIONS

Last revised: January 2005

E.1 Acronyms

E.2 Definitions

E.1 ACRONYMS

ACP	Area Contingency Plan
AFFF	Aqueous Film Forming Foam
ASTM	American Society of Testing Materials
BBL	Barrel(s)
BLM	Bureau of Land Management (USDOI)
BPD	Barrels Per Day
BPH	Barrels Per Hour
CERCLA	Comprehensive Environmental Response, Compensation & Liability Act of 1980, as amended
CFR	Code of Federal Regulations
CO ₂	Carbon Dioxide
COTP	Captain of the Port (USCG)
CRZ	Contamination Reduction Zone
CWA	Clean Water Act of 1977 (Federal)
EAP	Emergency Action Plan
EMS	Emergency Medical Services
EOC	Emergency Operations Center
EPA	U. S. Environmental Protection Agency
EPCRA	Emergency Planning and Community Right-to-Know Act
ERAP	Emergency Response Action Plan
ERP	Emergency Response Plan
ERT	Emergency Response Team
FAA	Federal Aviation Administration
FEMA	Federal Emergency Management Agency
FOSC	Federal On-Scene Coordinator
FRP	Facility Response Plan
FRT	Facility Response Team
FWPCA	Federal Water Pollution Control Act of 1972
GIS	Geographic Information System
GPM	Gallons Per Minute
HAZMAT	Hazardous Materials
HMIS	Hazardous Material Information System
IC	Incident Commander
IMS	Incident Management System
IMT	Incident Management Team
JIC	Joint Information Center
LEL	Lower Explosive Limit
LEPC	Local Emergency Planning Committee

LEPD	Local Emergency Planning District
LNG	Liquid Natural Gas
LPG	Liquefied Petroleum Gas
MSDS	Material Safety Data Sheets
MTR	Marine Transportation Related
N/A	Not Applicable
NCP	National Oil and Hazardous Substances Pollution Contingency Plan
NIIMS	National Interagency Incident Management System
NM	Nautical Miles
NOAA	National Oceanic and Atmospheric Administration
NRC	National Response Center
NRDA	National Resource Damage Assessment
NRT	National Response Team
OBA	Oxygen Breathing Apparatus
OPA 90	Oil Pollution Act of 1990
OSC	On-Scene Coordinator/Commander
OSHA	Occupational Safety and Health Administration (USDH)
PPE	Personal Protective Equipment
PREP	(National) Preparedness for Response Exercise Program
QI	Qualified Individual
RCRA	Resource Conservation and Recovery Act of 1976
RQ	Reportable Quantity
RSPA	Research and Special Programs Administration (DOT)
SARA	Superfund Amendments and Reauthorization Act
SCADA	Supervisory Control and Data Acquisition (System)
SCBA	Self-Contained Breathing Apparatus
SDWA	Safe Drinking Water Act of 1986
SERC	State Emergency Response Commission
SETS	Safety Environment and Training Services
SI	Surface Impoundment
SIC	Standard Industrial Classification (Code)
SOSC	State On-Scene Coordinator
SPCC	Spill Prevention, Control, and Countermeasures (Plan)
SSC	Scientific Support Coordinator (NOAA)
UCS	Unified Command System
UEL	Upper Explosive Limit
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. Fish and Wildlife Service (USDOI)
USGS	U. S. Geological Survey (USDOI)

E.2 DEFINITIONS

Adverse Weather

The weather conditions that will be considered when identifying response systems and equipment in a response plan for the applicable operating environment. Factors to consider include significant wave height, ice, temperature, weather-related visibility, and currents with the Captain of the Port (COTP) zone in which the systems or equipment are intended to function.

Aqueous Film Forming Foam

A fluoro-carbon surfactant that acts as an effective vapor securing agent due to its effect on the surface tension of the water. Its physical properties enable it to float and spread across surfaces of a hydrocarbon fuel with more density than protein foam.

Average Most Probable Discharge (USCG)

A discharge of the lesser of 50 barrels (2100 gallons) or one percent of the volume of the worst case discharge.

Barrel

Measure of space occupied by 42 U. S. gallons at 60 degrees Fahrenheit.

Bleve

A boiling liquid-expanding vapor explosion; failure of a liquefied flammable gas container caused by fire exposure. Pronounced "blevey."

Boilover

Occurs when the heat from a fire in a tank travels down to the bottom of the tank causing water that is already there to boil and push part of the tank's contents over the side.

Carbon Dioxide

A heavy, colorless, odorless, asphyxiating gas that does not normally support combustion. It is one and one-half times heavier than air and when directed at the base of a fire its action is to dilute the fuel vapors to a lean mixture to extinguish the fire.

Class A Fire

A fire involving common combustible materials which can be extinguished by the use of water or water solutions. Materials in this category include wood and wood-based materials, cloth, paper, rubber and certain plastics.

Class B Fire

A fire involving flammable or combustible liquids, flammable gases, greases and similar products. Extinguishment is accomplished by cutting off the supply of oxygen to the fire or by preventing flammable vapors from being given off.

Class C Fire

A fire involving energized electrical equipment, conductors or appliances. Nonconducting extinguishing agents must be used for the protection of firefighters.

Class D Fire

A fire involving combustible metals, for example, sodium, potassium, magnesium, titanium and aluminum. Extinguishment is accomplished through the use of heat-absorbing extinguishing agents such as certain dry powders that do not react with the burning metals.

Cold (Support) Zone

An area free of contaminants so that Personal Protection Equipment (PPE) is not required for personnel working in this area. Command functions and supporting operations are carried out here.

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 may direct the on-scene response from this location.

Communication Equipment

Equipment that will be utilized during response operations to maintain communication between employees, contractors, 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 the product for recovery.

Contamination Reduction Zone

Same as the warm zone, a buffer between the hot and cold zones. Decontamination activities take place there. Equipment needed to support the primary response operation may be staged in the warm zone.

Contingency Plan

A document used by: (1) federal, state, and local agencies to guide planning and response procedures regarding spill 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 Means

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 U.S.C.G. 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 USCG 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
- Active membership in a 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, 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 the Coast Guard to verify the availability of the response resources identified through tests, inspections, 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.

Demand Breathing Apparatus

A type of self-contained breathing apparatus that provides air or oxygen from a supply carried by the user.

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.

Diversions Boom

A flotation/freeboard device, made with a skirt/curtain, longitudinal strength member, and ballast unit/weight designed to deflect or divert the product towards a pick up point, or away from certain areas.

Environmentally Sensitive Areas

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.

Exclusion Zone

Same as hot zone, the area where a hazard exists. This is the hazardous location on site, therefore entry requires personal protective equipment (PPE). It must be big enough for both mitigation activities and protection of personnel in the warm zone should an explosion, fire, change of wind direction, or an unexpected release occur during response activities.

Explosive Range

Flammable range; the range of the mixture of air and flammable gas or flammable vapor of liquids that must be present in the proper proportions for the mixture to be ignited. The range has upper and lower limits; any mixture above the upper explosive limit or below the lower explosive limit will not burn.

Facility

Any pipeline, structure, equipment, or device used for handling oil including, but not limited to, underground and aboveground storage tanks, impoundments, mobile or portable drilling or workover rigs, barge mounted drilling or workover rigs, and portable fueling facilities located offshore or on or adjacent to coastal waters or any place where a discharge of oil from the facility could enter coastal waters or threaten to enter the coastal waters.

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.

Flashover

The ignition of combustibles in an area heated by convection, radiation, or a combination of the two. The action may be a sudden ignition in a particular location followed by rapid spread or a "flash" of the entire area.

Flash Point

The temperature at which a liquid fuel gives off sufficient vapor to form an ignitable mixture near its surface.

Foam

A blanket of bubbles that extinguishes fire mainly by smothering. The blanket prevents flammable vapors from leaving the surface of the fire and prevents oxygen from reaching the fuel. The water in the foam also has a cooling effect.

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 designed as such by the Administrator of 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.

Hot (Exclusion) Zone

The area where a hazard exists. This is the hazardous location on site, therefore entry requires personal protective equipment (PPE). It must be big enough for both mitigation activities and protection of personnel in the warm zone should an explosion, fire, change of wind direction, or an unexpected release occur during response activities.

Hypothermia

A dangerously high fever that can damage nerve centers. This condition can result from exposure to excessive heat over an extended period of time.

Ignition Temperature

The lowest temperature at which a fuel will burn without continued application of an ignition source.

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 extraordinary event, including a spill, is categorized into functional components and responsibility for each component assigned to the appropriate individual or agency.

Incident Management Team

The personnel identified to staff the organizational structure identified in a response plan to manage response plan implementation.

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 the transport begins.

Lead Agency

The government agency that assumes the lead for directing the spill response.

Lead Federal Agency

The agency which coordinates the federal response to incidents on navigable waters. 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 a Federal spill response.

Lower Flammable Limit

Minimum flammable concentration of a particular gas in the air.

Maximum Extent Practicable

The planning values derived from the planning criteria used to evaluate the response resources described in the response plan to provide the on-water recovery capability and the shoreline protection and clean-up capability to conduct response activities for a worst case discharge from a facility in adverse weather.

National Contingency Plan

The plan prepared under the Federal Water Pollution Control Act (33 United States Code '1321 et seq) and the Comprehensive Environmental Response, Compensation, and Liability Act of 1980 (42 United States Code '9601 et seq), as revised from time to time.

Non-Persistent or Group I Oil

A petroleum-based oil that, at the time of shipment, consists of hydrocarbon fractions:

- At least 50% of which by volume, distill at a temperature of 340EC (645EF)
- At least 95% of which volume, distill at a temperature of 370EC (700EF)

Non-Petroleum Oil

Oil of any kind that is not petroleum-based. It includes, but is not limited to, animal and vegetable oils.

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)

An entity that provides oil spill response resources, and includes any for profit or not-for-profit contractor, cooperative, or in-house response resources that have been established in a geographic area to provide required response resources.

Operating Area

The rivers and canals, inland, near shore, Great Lakes, or offshore geographic location(s) 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.

Overhaul

A procedure following a fire whereby the area is examined for hidden fire and fire extension and the fire area is cleaned up.

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:

- Group II - specific gravity less than .85
- Group III - specific gravity between .85 and less than .95
- Group IV - specific gravity .95 to and including 1.0
- Group V - specific gravity greater than 1.0

Primary Response Contractor(s)

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 predesignated of Federal On-Scene Coordinator (FOCS)
- Obligating, either directly or through prearranged contracts, funds required to carry out all necessary or directed response activities

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.

Reid Vapor Pressure Method

Method used by the American Society of Testing Materials to test vapor pressure. It is a measure of the volatility, or tendency to vaporize, of a liquid.

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.

Sloper

An event that occurs when water is introduced into a tank of very hot liquid, causing the liquid to froth and spatter.

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.

Spontaneous Ignition

A fire that occurs without a flame, spark, hot surface, or other outside source of ignition.

Staging Areas

Designated areas near the spill site accessible for gathering and deploying equipment and/or personnel.

State Emergency Response Commission (SERC)

A group of officials appointed by the Governor to implement the provisions 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.

Static Electricity

Charges of electricity accumulated on opposing and usually moving surfaces having negative and positive charges, respectively. A hazard exists where the static potential is sufficient to discharge a spark in the presence of flammable vapors or combustible dusts.

Support Zone

Same as cold zone, an area free of contaminants so that personal protection equipment (PPE) is not required for personnel working in this area. Command functions and supporting operations are carried out here.

Tornado Warning

A tornado has been sighted.

Tornado Watch

Conditions are favorable for tornados to form.

Unified Command

The method by which local, state, and federal agencies will work with the Incident Commander 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 objectives

Warm (Contamination Reduction) Zone

A buffer between the hot and cold zones. Decontamination activities take place there. Equipment needed to support the primary response operation may be staged in the warm zone.

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 substances 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.

APPENDIX F ADDITIONAL INFORMATION

Last Revised: January 19, 2012

- Acme Contract/Certification

2012

ACME PRODUCTS EMERGENCY RESPONSE PACKAGE

CONTENTS:

1. PREP Letter
2. Listing of Equipment and Personnel
3. Rate Sheet and Policies
4. Copy of Contract
5. Coast Guard/OSRO Classification Statement
6. Insurance Certificate
7. Drug Testing Statement
8. Response Time Map

January 2012

This is to acknowledge that Acme Products Co. has successfully deployed a representative sample of our spill response equipment, quarterly, during the last 12 months. The balance of our spill response equipment not deployed has been properly inspected, maintained, and documented to be in good operating condition.

This is also to acknowledge that our spill response personnel have received the necessary training to safely and effectively respond to an oil spill. A record of this training is on file for the last three (3) years and is available for review upon

request. Sincerely,

ter 13:36

President

ABA!luur
Emergency Prep Letter



Acme Products Co.

2666 N. Darlington- Tulsa, Oklahoma
74115

Phone: (918)836-7184- Fax: (918)836-
9197 www.acmeboom.com

SPILL RESPONSE EQUIPMENT AND PERSONNEL LIST

24 Hour Telephone Service and Pagers facilitate rapid response

Containment Boom: 5000' - 10,000' suitable for rivers, lakes, bays, harbors, near shore and inland waterways; 1,000' - 2,000' of Super Mini Boom for ditches, creeks, streams or sweeping on rivers and lakes.

4 Ea. - 36" Drum Skimmer

1 Ea.- 3" Mop Skimmer

Washdown Pumps: 4 Floating and 15 Portable High Pressure with 200'- 300' of 1 1/2" discharge hose.

Transfer Pumps: 2- 3" Diaphragm and 3- 3" Centrifugal

Trash. Blowers: 4 Backpack Type, 6 Hand Held

8 - Weedeaters and 2 Chainsaws

Boats: 4- 16', 1 - 12' Aluminum with 25 H.P. Motors, Extra Motors, and Trailers

Trailers: 2 - 16 Ft. Boom Trailers

Response Type:

20 Ft. Closed Van Type with personnel equipment (boots, waders, gloves, coveralls, hard hats, goggles, safety glasses, filter masks, respirators, life jackets, etc.); propane torches and tanks; hand tools (shovels, pitchforks, rakes, dipnets, sledge hammers, brush hooks, squeegees, etc.); fuel tanks and safety cans; barricades with flashers, traffic cones and hazard tape; spare parts and motors; quick couplers for hose and pipe (1"-4"); repair couplers; tow/tie off bridles, add-on lead ballast weights and tow hitches for containment boom; rope, anchors, and buoys for anchoring containment boom; tarps, poly bags, metal stakes, filter fence wire; generators with lights.

Delivery Type:

2@ 20Ft. Closed Van Type for sorbents, boom, etc.

2 @ 20 Ft. Open Stakebody Type for boom,
accessories, etc. I - 16 Ft. Open Stakebody Type for
boom, accessories, etc.

Page 2 - Spill Response Equipment and Personnel List

Vehicles:

1 - 4 Wheel Drive Tahoe
 1 - 1 Ton Dual-Wheel 12Ft Stakebody Truck
 1 - 1 Ton 4 Wheel Drive Crew Cab Truck
 1 - V. Ton 4 Wheel Drive Pick-up
 Truck 1 - Y, Ton 4 Wheel Drive Pick-up
 Truck 1 - Y, Ton Pick-up Truck
 1 - 4 Wheel Drive ATV with Trailer

Communication Equipment: Hand Held 2-Way Radios & Cell Phones

Poly Overpack Drums: 10-20 Each

Sorbents: 4-5 Truckloads of assorted types (booms, pads, rolls, etc.) for different hydrocarbons and applications (C.E.P., Acme, Oil Snares for Viscous Oil, Dicalite, Sphag-Sorb, and KenafParticulate).

Personnel: 10 to 15 experienced personnel capable of acting as supervisors, foreman, and equipment operators.

In the event of a major spill, we have established stand-by relationships with experienced contractors in the following locations:

Ardmore, OK	Kansas City, KS
Denver, Colorado	Baltimore, Maryland
San Antonio,	Newark, New Jersey
Texas Houston,	Camden, New Jersey
Texas Fort Worth,	Pittsburgh, Pennsylvania
Texas Galveston,	Parkers Ford,
Texas Port Arthur,	Pennsylvania Detroit,
Texas	Michigan Indianapolis,
New Orleans,	Indiana Kinston, North
Louisiana Memphis,	Carolina Seattle,
Tennessee Nashville,	Washington
Tennessee Long	Minneapolis/St. Paul Minnesota
Beach, California	
Birmingham, Alabama	



Acme Products Co.

2666 N. Darlington- Tulsa, Oklahoma 74115
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www.acmeboom.com

OIL SPILL RESPONSE RATES AND POLICIES

Effective Date: January 1,
2012

PERSONNE

Laborer	Straight Time
.....	\$28.00/Hour
Technician	Spill
our	\$40.00/Hour
Equipment	Operator
.....	\$45.00/Hour
Foreman	
.....	\$55.00/Hour
Supervisor	
.....	\$66.00/Hour

Labor rates computed as follows:

Straight Time: Week Days, 8:00AM to 4:00PM

Time and One-Half: Week Days, 4:00PM to 8:00AM,

Saturdays and Sundays - All Day

Double Time: Holidays -All Day

* Emergency Deliveries@ \$2.75 per mile- one way.

Minimum four-hour labor charge

Charge for subsistence outside 50-mile radius of Tulsa, OK
.....\$140.00/Day/Employee

Charge for P.P.E., Respirators, and hand tools\$
65.00/Day/Employee

RENTAL POLICY

Minimum rental of one day on daily rated equipment

VEHICLES. BOATS AND TRAILERS

Four-Wheel	Drive
.....	\$150.00/Day Pickup
Truck	
.....	\$100.00/Day
Stake	Body
Truck	(1 1/2 Ton)
.....	\$200.00/Day Cargo Van Truck
(16'- 24')	\$225.00/Day
16'	Boat with Outboard Motor
.....	\$250.00/Day
12'	Boat with Outboard Motor
.....	\$175.00/Day Response Trailer, 20'
Van W/Spill Response Equipment	\$350.00/Day Delivery

Trailers\$ 75.00/Day
 Four Wheeler (ATV) with
 Trailer.....\$225.00/Day

RECOVERY EQUIPMENT AND
ACCESSORIES

Oil Containment Boom- Acme "O.K. Conal" \$1
 ..40/Ft/Day

Danfotih Anchors with Mooring and Marker Buoys \$I
 50.00/Set/Spill

(If not retrievable, cost=
 \$598.50/Set)

Acme Super Mini Boom (2 1/2" Float x4" Skiti) \$
 .75/Ft/Day

Boom Cleaning (Depending on type of contaminates) \$
 .60/Ft.- .90/Ft

SKIMMERS, PUMPS, ETC.				
Drum	Skimmer	w/	Air	Compressor
Powered Skimmer			\$500.00/Day	Acme FS400ASK-39T
39T Vacuum Skimmer			\$200.00/Day	Acme FSV-39T
Acme		Mop		Skimmer
			\$300.00/Day	Acme Drum
Skimmer With Power Pack				\$500.00/Day
Acme	FS150A-39G4	Floating	Washdown	Pump
		\$150.00/Day	Honda High Pressure	Pumps -
Washdown/Decon			\$150.00/Day	Honda 3" Contractors
Trash Pump			\$150.00/Day	Backpack
Blower			\$ 75.00/Day	
3" Suction Hose W/Fittings				\$
2.50/Ft/Spill				
2" Suction Hose W/F ittings				\$
1.50/Ft/Spill				
1 112" Suction Hose W/Fittings				\$
1.25/Ft/Spill				
Trailer	Mounted		High	Pressure
Washer			\$300.00/Day	
3"	Double		Diaphragm	Pump
			\$200.00/Day	

MISCELLANEOUS EQUIPMENT

Trailer	Mount		Generator
		\$250.00/Day	Generator with
Floodlights		\$1	75.00/Day
Personnel	-	Decon	Pool
		\$100.00/Day	Equipment -
Decou Pool			\$350.00/Day
Portable Radio(s) and Cellular Phone(s)			\$
45.00/Day	Chainsaw,	Weed	eater,
			Brush
			Cutter
			\$ 75.00/Day
20/30 Gallon Pollution Cans			\$
15.00/Spill	D.O.T.	Poly	Overpack
Drums		\$190.00/Spill	Life
Jacket(s)			\$
25.00/Spill		Boots,	Hip
			\$ 60.00/Spill
Boots, Chest Wader			\$
95.00/Spill	LEL	and	Draeger
			Monitoring
			Equipment
			\$ 50.00/Day

MISCELLANEOUS MATERIALS

Polypropylene Rope, 114" x 1000' Roll		\$
60.00/Roll Polypropylene Rope, 1/2" x 1000'		
Roll		\$1 80.00/Roll Polypropylene Rope, 5/8"
x 600' Roll		\$1 80.00/Roll Rags (25# Box)
		\$ 35.00/Box
Polyethylene Sheeting-Visqueen		
		\$150.00/Roll Heavy Duty Polyethylene
Trash Bags		\$
		2.00/Eac
h Heavy-Duty Metal Stakes		\$
10.00/Each		

CLEANING EQUIPMENT: Cleaning Contaminated Equipment will be 114 to 112 Daily Rental Rate per Unit

STAND BY RATE: Negotiated based on circumstances

SORBENTS: Sorbents will be charged according to Acme's published spill list prices- (Available upon request)

OUTSIDE EQUIPMENT RENTAL

A 20% handling charge is added to any equipment, materials or service which we subcontract, purchase, or rent that is not listed on this rate sheet.

DISPOSAL

Disposal of waste products is the responsibility of the customer. However, upon customer request, transport/disposal of waste products can be arranged by Acme Products. A 20% handling fee will be added to any outside contractor, transportation or disposal site charges.

TERMS:

Invoices will be rendered either on a daily basis or at the completion of the individual job, depending on the duration of the job.

All rental charges, sell charges, service charges, prepaid transportation, cartage, etc. are payable NET CASH within ten (10) days from date of Invoice. FINANCE CHARGES computed by a "PERIODIC RATE" OF ONE AND ONE-HALF PERCENT (1-1/2%) PER MONTH (18%) PER ANNUM, will be applied to any unpaid balance beginning thirty (30) days from invoice date. Should it become necessary to employ an attorney to collect any unpaid balance of an Invoice, customer agrees to pay the fee of such attorney. Such fee is hereby fixed at twenty-five percent (25%) of the amount due or One Hundred Dollars (\$100.00), whichever is greater.

Experienced Acme Products Company personnel are available for operating equipment and for instructional purposes. Personnel and transportation charges as shown on cost schedule will apply.

These terms and conditions are to be considered an integral part of Acme Products Company oil spill reclaiming service price schedules.

CONDITIONS:

The renter of Acme Products Company equipment and services agrees that Acme Products Company is an Independent contractor and that all work be done under the exclusive control and supervision of renter (hereinafter called customer) or his agent. The work area, premises about the area, Ingress and egress routes in the area, and services provided by others are at all times in complete care, custody, and control of the customer or his agent. The customer shall provide all state and local permits of whatever governmental documentation or authority is required to perform the job.

A responsible representative of the customer must be present to designate work area and ascertain conditions, to the best of his knowledge, under which Acme Products Company services or products will be used. Because of uncertain or unknown conditions and incidental hazards under which services are rendered, Acme Products Company does not guarantee the results of the work, services, or products, and all services are rendered at the customer's risk.

It is agreed that Acme Products Company shall not be liable or responsible for any loss, damage, or injury to said work area or customer facilities resulting from the use of its tools, equipment or services, or from acts of any person engaged in doing such work. The customer agrees to protect, indemnify and hold Acme Products Company, its agents and employees harmless from claims, damages, or causes of action asserted by customer employees, or by any third parties for personal injury or property damage including, without limitation, damage to work area, customer facilities or third party property, in any way arising out of the rental of Acme Products Company accessories, or other equipment and from any services rendered except that Acme Products Company shall be liable for injury caused by its Intentional misconduct.

Conditions at the work area which prevent operation of Acme Products Company equipment or change in plans by the customer do not relieve the customer of his responsibility for personnel, rental, or transportation charges. A minimum of four (4) hours time for each Acme Products Company personnel responding to customer's request (all as shown in current price schedule attached) will be charged.

No employee, agent or representative of Acme Products Company has authority to alter, extend, or exceed these terms except an officer of Acme Products Company. Should customer violate any of these terms and conditions, become bankrupt, insolvent, in receivership, or should any creditor or person levy customer's property or equipment, Acme Products Company shall immediately have the right without notice to retake and remove its equipment wherever it may be found.

EQUIPMENT RENTALS

Equipment and tools used will be charged for at the posted rental prices which are subject to change without notice. The customer's responsibility herein begins when tools or equipment leave Acme Products Company service point and continue until they are returned.

Tools or equipment obtained from outside sources are subject to the condition, warranties, if any, and prices established by suppliers. (Special tools ordered and built will be charged at applicable shop time, plus minimum rental, whether or not the tools are used).

MINIMUM RENTALS:

The renter of Acme Products Company equipment agrees to a minimum rental time of one (1) calendar day commencing when the equipment leaves the Acme Products Company service point. Rental time shall be invoiced to the customer until the equipment is returned to the Acme Products Company point or until the customer makes other arrangements with Acme Products Company for return of equipment.

PERSONNEL TIME:

All personnel will be charged at the rates shown in the personnel price schedule. Time is charged when personnel leave Acme Products Company service point and continues until they return, or where subsistence and lodging charges are in force, from the time they leave their lodging until their return.

DAMAGE TO RECOVERY EQUIPMENT AND ACCESSORIES:

Ordinary wear and tear excepted, recovery equipment and accessories will be repaired at customer's expense.

LOSS OR DAMAGE BEYOND REPAIR OF PROTECTIVE CLOTHING, HAND TOOLS AND MISCELLANEOUS EQUIPMENT:

Loss or damage beyond repair of miscellaneous equipment will be charged at replacement costs less accrued rental fees. All equipment damaged beyond repair will be held up to ten days for the customer's inspection or disposition.

TAXES:

All federal, state or municipal taxes, except income and ad valorem taxes, now or hereafter imposed with respect to services rendered; to rental equipment; to the processing, manufacture, repair, delivery, transportation of merchandise or equipment shall be added to and become a part of the price payable by the customer.

INSURANCE:

Acme Products Company shall maintain at all times the following insurance, in amounts not less than those respectively specified: (a) Workmen's Compensation insurance complying with the laws of each state in which the work is to be performed, \$100,000/\$500,000/\$100,000; (b) Employer's liability Insurance, \$500,000 combined single limit; (c) Automotive and general liability Insurance, \$500,000 combined single limit; and shall furnish evidence satisfactory that such insurances are in effect.

RESPONSIBILITY FOR WORK:

Work in progress, including all property and charges for labor and rental equipment, shall be exclusive responsibility of the customer. If the customer obtains Insurance protections against such risks or part thereof Acme Products Company and its insurers shall have full waiver of subrogation by the customer and customer's insurers, and such customer-obtained insurance shall bear all losses thereby insured against and up to the full amount of such insurance without any contribution by Acme Products Company or its insurer and without any proration of loss between the customer's insurer and Acme Products Company or its insurers. If requested, Acme Products company shall provide such insurance as hereinafter stated.

ADDITIONAL INSURANCE:

Acme Products Company agrees to use its best efforts to procure additional insurance or to increase the limits of the policies listed above if requested by the customer. However, the cost of any additional Insurance is to be charged as outside services arranged by Acme Products Company and Invoiced to the customer at Acme Products Company's cost plus 20%.

LIMITATIONS:

Acme Products Company obligation, if assumed, to indemnify customer from all claims, liabilities and causes of action based upon Acme Products Company's negligence or that of Acme Products Company's employees, agents or subcontractors shall be limited strictly to and shall not exceed Acme Products Company Insurance coverage, which insurance coverage and its limitations and exclusion are explained hereinafter. Accordingly to the extent that the damage or destruction not be within the Insurance cover, customer shall pay Acme Products Company for repairs or replacement at the rates set forth herein.

COMPANY

NAME:

AUTHORIZED

SIGNATURE:

DATE: _____

U.S. Department of
Homeland Security

United States
Coast Guard



PHMSA 000026805

Commander
National Strike Force Coordination Ctr.

1461 North Road Street
Elizabeth City, NC 27909
Staff Symbol:
Phone: 252-331-6000
FAX: 252-331-6012

16465

ACME Products Company
Attn: David Pollard
2666 N. Darlington
Tulsa, OK 74115

JUL 26 2006

Dear Mr. Pollard,

Your application for classification as an Oil Spill Remedial Organization (OSRO) has been reviewed and processed as outlined in the Coast Guard OSRO Classification Guidelines dated 27 April 2001. You are assigned OSRO classification number 0010; please use this number in all future correspondence to this office. You have received the following classifications:

Captain of the Port (COTP) Zone	Environment	Facility	Vessel
Sector Lower Mississippi	River/Canal/Inland	MMPD	MMPD
Sector Upper Mississippi	River/Canal/Inland	MMPD	MMPD

Enclosure (1) is a CD containing your classification information. On the CD, you will find a summary of your classifications by environment and COTP zone and a summary of the resnmc totals for boom, Temporary Storage Capacity (TSC), and Effective Daily Recovery Capacity (EDRC) used to determine these classifications. Our files will be updated to reflect your current status; please inform your clients of the same. Your classifications will also be listed on the

OSRO Classification Matrix available on the Internet at:

. <http://www.uscg.mil/fhq/nsfweb/nsfcc/ous{OSI{Q/links/osroInfoonclassifiedosro.htm}}>!!

The Coast Guard is transitioning to a Sector organization which consolidates field operations and marine safety functions. MSO Memphis is now Sector Lower Mississippi. MSO Saint Louis is now Sector Upper Mississippi.

If you have any questions or would like more information regarding your classifications, please contact any of the Response Resource Assessment Branch or the Response Resource Inventory Branch staff. Our contact information can be found in Enclosure (2).

Thank you for your participation in the OSRO program; your efforts to strengthen our national response capabilities are greatly appreciated.



Acme Products Co.

2666 N. Darlington- Tulsa, Oklahoma
74115

Phone: (918)836-7184- Fax:
(918)836-9197

www.acmeboom.c
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ANNUAL EQUIPMENT DEPLOYMENT CERTIFICATION REPORT Documentation of equipment used during spill response, drills or training.

This report is used for crediting the response plan holders for OSRO equipment deployment under the Preparedness Response Exercise Program (PREP), all deployments, whether during actual spill response, training or exercise/drills must be properly documented. The contractor must certify that: 1) Response equipment is operational; 2) Personnel are capable of deploying and operating the equipment in a spill response; and 3) Response resources participate in annual deployment drills.

PLEASE PROVIDE THE FOLLOWING INFORMATION (use additional sheet(s) if

necessary): OSRO NAME: Acme Environmental Inc. dba Acme Products

Company ADDRESS: 2666 N. Darlington Ave., Tulsa, OK 74115

TEL (24 HR SERVICE): 918-836-7184

CENTERS: Tulsa, Oklahoma

MSO/COTP ZONE(S) OR EPA
REGION(S): Lower/Upper
Mississippi

ENVIRONMENT (CIRCLE ONE)

PROTECTED SHELTERED UNSHELTERED

GEOGRAPHICAL DESCRIPTION (FACILITY, BODY OF WATER, MILES
OFFSHORE): Cherry Creek and Arkansas River, Tulsa, Oklahoma

EQUIPMENT DEPLOYED: [List all types of boom (minimum 1,000 ft. of solid log flotation, air inflated, self inflated, skimmers (including vacuum trucks), boats, temporary storage devices, Command/Communications Center.]
900' containment boom, 2 boats, 3 trucks, ER trailer

PERSONNEL: [List by category and number (supervisor, foreman, equipment operator, technician, etc.)]

1 – Foreman, 6 – Spill techs

ADDITIONAL

REMARKS:

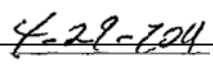
Training Exercise

I certify that:

- 1) *The equipment used is in good working order and was properly operated in the environment indicated;*
- 2) *The involved personnel demonstrated competency in deployment and operation of the equipment.*



Dave Pollard, Vice-President



Date



Acme Products Co.

2666 N. Darlington- Tulsa, Oklahoma
74115

Phone: (918)836-7184- Fax: (918)836-
9197 www.acmeboom.com

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PLEASE PROVIDE THE FOLLOWING INFORMATION (use additional sheet(s) if

necessary): **OSRO NAME:** Acme Environmental Inc. dba Acme Products Company

ADDRESS: 2666 N. Darlington Ave., Tulsa, OK 74115

TEL (24 HR SERVICE): 918-836-7184

CENTERS: Tulsa, Oklahoma

MSO/COTP ZONE(S) OR EPA REGION(S):
Lower/Upper Mississippi

ENVIRONMENT (CIRCLE ONE)

PROTECTED SHELTERED UNSHELTERED

GEOGRAPHICAL DESCRIPTION (FACILITY, BODY OF WATER, MILES OFFSHORE):
Little Wewoka Creek, 2.4 miles

EQUIPMENT DEPLOYED: [List all types of boom (minimum 1,000 ft. of solid log flotation, air inflated, self inflated, skimmers (including vacuum trucks), boats, temporary storage devices, Command/Communications Center.]

1,100' containment boom, 3 boats, ER trailer, 2 ATV, 11 washpumps, 4 drum skimmers, 6 blowers, vac trucks, transports, 7 trucks, 3-3" trash pumps, 3 decon pools

PERSONNEL: (List by category and number (supervisor, foreman, equipment operator, technician, etc.))

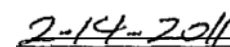
2-Supervisors, 2-Foreman, 28-Spill tech's, 2-Laborers, 3-Equipment Operators

ADDITIONAL REMARKS:

Emergency Response

I certify that:

- 1) *The equipment used is in good working order and was properly operated in the environment indicated;*
- 2) *The involved personnel demonstrated competency in deployment and operation of the equipment.*


Dave Pollard, Vice President
Date 2-14-2011



Acme Products Co.

2666 N. Darlington - Tulsa, Oklahoma 74115
Phone: (918)836-7184- Fax: (918)836-9197
www.acmeboom.com

ANNUAL EQUIPMENT DEPLOYMENT CERTIFICATION REPORT

Documentation of equipment used during spill response, drills or training.

This report is used for crediting the response plan holders for OSRO equipment deployment under the Preparedness Response Exercise Program (PREP), all deployments, whether during actual spill response, training or exercise/drills must be properly documented. The contractor must certify that: 1) Response equipment is operational; 2) Personnel are capable of deploying and operating the equipment in a spill response; and 3) Response resources participate in annual deployment drills.

PLEASE PROVIDE THE FOLLOWING INFORMATION (use additional sheet(s) if necessary):

OSRO NAME: Acme Environmental Inc. dba Acme Products Company

ADDRESS: 2666 N. Darlington Ave., Tulsa, OK 74115

TEL (24 HR SERVICE): 918-836-7184

CENTERS: Tulsa, Oklahoma

MSO/COTP ZONE(S) OR EPA REGION(S):

Lower/Upper Mississippi

ENVIRONMENT (CIRCLE ONE)

PROTECTED SHELTERED UNSHELTERED

GEOGRAPHICAL DESCRIPTION (FACILITY, BODY OF WATER, MILES OFFSHORE):

Creek east of Caney, Kansas, 1.2 miles

EQUIPMENT DEPLOYED: [List all types of boom (minimum 1,000 ft. of solid log flotation, air inflated, self inflated, skimmers (including vacuum trucks), boats, temporary storage devices, Command/Communications Center.]

600' containment boom, 2 boats, 5 trucks, vac trucks, 2 drum skimmers, ER trailer, 2 floating wash pumps, 4 high pressure pumps, 3 blowers, decon pool, hot washer

PERSONNEL: [List by category and number (supervisor, foreman, equipment operator, technician, etc.)]

1-Supervisors, 1-Foreman, 8-Spill tech's, 2-Equipment Operators

ADDITIONAL REMARKS:

Emergency Response

I certify that:

- 1) The equipment used is in good working order and was properly operated in the environment indicated;*
- 2) The involved personnel demonstrated competency in deployment and operation of the equipment.*



Date 5-10-2011



Acme Products Co.

2666 N. Darlington- Tulsa, Oklahoma
74115

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9197 www.acmeboom.com

ANNUAL EQUIPMENT DEPLOYMENT CERTIFICATION REPORT Documentation of equipment used during spill response, drills or training.

This report is used for crediting the response plan holders for OSRO equipment deployment under the Preparedness Response Exercise Program (PREP), all deployments, whether during actual spill response, training or exercise/drills must be properly documented. The contractor must certify that: 1) Response equipment is operational; 2) Personnel are capable of deploying and operating the equipment in a spill response; and 3) Response resources participate in annual deployment drills.

PLEASE PROVIDE THE FOLLOWING INFORMATION (use additional sheet(s) if

necessary): OSRO NAME: Acme Environmental Inc. dba Acme Products

Company ADDRESS: 2666 N. Darlington Ave., Tulsa, OK 74115

TEL (24 HR SERVICE): 918-836-7184

CENTERS: Tulsa, Oklahoma

MSO/COTP ZONE(S) OR EPA
REGION(S): Lower/Upper
Mississippi

ENVIRONMENT (CIRCLE ONE)

PROTECTED SHELTERED UNSHELTERED

GEOGRAPHICAL DESCRIPTION (FACILITY, BODY OF WATER, MILES
OFFSHORE): Port of Catoosa, Catoosa, Oklahoma

EQUIPMENT DEPLOYED: [List all types of boom (minimum 1,000 ft. of solid log flotation, air inflated, self inflated, skimmers (including vacuum trucks), boats, temporary storage devices, Command/Communications Center.]

800' containment boom, 5 boats, 4 trucks, ER trailer, 2 wash pumps, roll off boxes

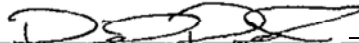
PERSONNEL: [List by category and number (supervisor, foreman, equipment operator, technician, etc.)]

1-Supervisors, 1-Foreman, 10-Spill tech's, 5-Equipment Operators

ADDITIONAL
REMARK(S):
Emergency
Response

I certify that:

- 1) The equipment used is in good working order and was properly operated in the environment indicated;*
- 2) The involved personnel demonstrated competency in deployment and operation of the equipment.*



Dave Pollard, Vice-President

5-31-2011

Date



Acme Products Co.

2666 N. Darlington- Tulsa, Oklahoma
74115

Phone: (918)836-7184- Fax: (918)836-
9197

www.acmeboom.co
m

ANNUAL EQUIPMENT DEPLOYMENT CERTIFICATION REPORT Documentation of equipment used during spill response, drills or training.

This report is used for crediting the response plan holders for OSRO equipment deployment under the Preparedness Response Exercise Program (PREP), all deployments, whether during actual spill response, training or exercise/drills must be properly documented. The contractor must certify that: 1) Response equipment is operational; 2) Personnel are capable of deploying and operating the equipment in a spill response; and 3) Response resources participate in annual deployment drills.

PLEASE PROVIDE THE FOLLOWING INFORMATION (use additional sheet(s) if

necessary): OSRO NAME: Acme Environmental Inc. dba Acme Products

Company ADDRESS: 2666 N. Darlington Ave., Tulsa, OK 74115

TEL (24 HR SERVICE): 918-836-7184

CENTERS: Tulsa, Oklahoma

MSO/COTP ZONE(S) OR EPA
REGION(S): Lower/Upper Mississippi

ENVIRONMENT (CIRCLE ONE)

PROTECTED SHELTERED UNSHELTERED

GEOGRAPHICAL DESCRIPTION (FACILITY, BODY OF WATER, MILES
OFFSHORE): Arkansas River, Tulsa, Oklahoma

EQUIPMENT DEPLOYED: (List all types of boom (minimum 1,000 ft. of solid log flotation, air inflated, self inflated, skimmers (including vacuum trucks), boats, temporary storage devices, Command/Communications Center.)
1,300' silt curtain, 1 boat, 2 trucks

PERSONNEL: [List by category and number (supervisor, foreman, equipment operator, technician, etc.)]

1 -Foreman, 5-Spill tech's, 1 -Equipment Operators

ADDITIONAL REMARKS:

Emergency
Response

I certify that:

- 1) *The equipment used is in good working order and was properly operated in the environment indicated;*
- 2) *The involved personnel demonstrated competency in deployment and operation of the equipment.*


Ident

8-16-2011
Date



Acme Products Co.

2666 N. Darlington- Tulsa, Oklahoma
74115
Phone: (918)836-7184- Fax: (918)836-
9197
www.acmeboom.co
m

ANNUAL EQUIPMENT DEPLOYMENT CERTIFICATION REPORT

Documentation of equipment used during spill response, drills or training.

This report is used for crediting the response plan holders for OSRO equipment deployment under the Preparedness Response Exercise Program (PREP), all deployments, whether during actual spill response, training or exercise/drills must be properly documented. The contractor must certify that: 1) Response equipment is operational; 2) Personnel are capable of deploying and operating the equipment in a spill response; and 3) Response resources participate in annual deployment drills.

PLEASE PROVIDE THE FOLLOWING INFORMATION (use additional sheet(s) if

necessary): **OSRO NAME:** Acme Environmental Inc. dba Acme Products Company

ADDRESS: 2666 N. Darlington Ave., Tulsa, OK 74115

TEL (24 HR SERVICE): 918-836-7184

CENTERS: Tulsa, Oklahoma

MSO/COTP ZONE(S) OR EPA REGION(S):
Lower/Upper Mississippi

ENVIRONMENT (CIRCLE ONE)

PROTECTED SHELTERED UNSHELTERED

GEOGRAPHICAL DESCRIPTION (FACILITY, BODY OF WATER, MILES OFFSHORE):
Creek south of Enid, Oklahoma

EQUIPMENT DEPLOYED: [List all types of boom (minimum 1,000 ft. of solid log flotation, air inflated, self inflated, skimmers (including vacuum trucks), boats, temporary storage devices, Command/Communications Center.]
500' containment boom, 3 trucks, ER trailer

PERSONNEL: [List by category and number (supervisor, foreman, equipment operator, technician, etc.)]
1 -Foreman, 5- Spill tech's

ADDITIONAL REMARKS:

Training Exercise

I certify that:

- 1) The equipment used is in good working order and was properly operated in the environment indicated;*
- 2) The involved personnel demonstrated competency in deployment and operation of the equipment.*

C2C:: 
Dave Pollard, Viceident

Date 9-29-2011

Central Tech

Sapulpa, OK 74066

Certificate of Participation and Completion of the Training Program:

HAZWOPER Refresher 8 Hrs

29 CFR

1910.120

09/27/2011 Certificate No.
9272011.02

Name: David A. Pollard

Sponsored by: Acme Boom

Instructor: Greg LongCentral Tech

Sapulpa, OK 74066

Certificate of Participation and Completion of the Training Program:

HAZWOPER Refresher 8 Hrs

29 CFR

1910.120

09/27/2011 Certificate No.
9272011.05

Name: Larry K. Longest

Sponsored by: Acme Boom

Instructor: Greg LongCentral Tech

Sapulpa, OK 74066

Certificate of Participation and Completion of the Training Program:

HAZWOPER Refresher 8 Hrs

29 CFR

1910.120

09/27/2011 Certificate No.
9272011.01

Name: Abel E. Rivas

Sponsored by: Acme Boom

Instructor: Greg LongCentral Tech

Sapulpa, OK 74066

Certificate of Participation and Completion of the Training Program:

HAZWOPER Refresher 8 Hrs

29 CFR

1910.120

09/27/2011 Certificate No.
9272011.03

Name: Forrest L. Russell

Sponsored by: Acme Boom

Instructor: Greg LongCentral Tech

Sapulpa, OK 74066

Certificate of Participation and Completion of the Training Program:

HAZWOPER Refresher 8 Hrs

29 CFR

1910.120

09/27/2011 Certificate No.
9272011.08

Name: Vang Yang

Sponsored by: Acme Boom

Instructor: Greg LongCentral Tech

Sapulpa, OK 74066

Certificate of Participation and Completion of the Training Program:

HAZWOPER Refresher 8 Hrs

29 CFR 1910.120

09/27/2011 Certificate No. 9272011.07

Name: Otis R. Murray

Sponsored by: Acme Boom

Instructor: Greg Long

sapulpa, OK 74066 .:ct\

Central Tech

Sapulpa, OK 74066

Certificate of Participation and Completion of the Training Program:

HAZWOPER Refresher 8 Hrs

29 CFR

1910.120

09/27/2011 Certificate No.
9272011.04

Name: Juan A. Rivas

Sponsored by: Acme Boom

Instructor: Greg LongCentral Tech

Certificate of Participation and Completion of the Training Program:

HAZWOPER Refresher 8 Hrs

29 CFR 1910.120

09/27/2011 Certificate No. 9272011.06

Name: Osman Oyuela

Sponsored by: Acme Boom

Instructor: Greg Long

~~CERTIFICATE~~

Sapulpa, OK 74066

Certificate of Participation and Completion of the Training Program:

HAZWOPER Refresher 8 Hrs

29 CFR 1910.120

09/27/2011 Certificate No. 9272011.10

Name: Jose Oyuela

Sponsored by: Acme Boom

Instructor:

c; reg Lo ""-0

Central Tech

Sapulpa, OK 74066

Certificate of Participation and Completion of the Training Program:

HAZWOPER Operations Level • 40 Hrs

29 CFR

1910.120

Date: 10/6/2011 Certificate No.
10032011.150

Name: Salvador Marroquin

Sponsored by: Acme Products

Instructors: Rick PortillozCentral Tech

Sapulpa, OK 74066

Certificate of Participation and Completion of the Training Program:

HAZWOPER Refresher 8 Hrs

29 CFR

1910.120

09/27/2011 Certificate No.
9272011.09

Name: Xue Lee

Sponsored by: Acme Boom

Instructor: c;reg Lo""9

Central Tech

Sapulpa, OK 74066

Certificate of Participation and Completion of the Training Program

HAZWOPER Operations Level • 40 Hrs

29 CFR

1910.120

Date: 10/6/2011 Certificate
No. 10032011.151

Name: Erick Aguilar

Sponsored by: Acme Products

Instructors: Rick Portilloz

A@"

CERTIFICATE OF LIABILITY INSURANCE

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THIS CERTIFICATE IS ISSUED AS A MATTER OF INFORMATION ONLY AND CONFERS NO RIGHTS UPON THE CERTIFICATE HOLDER. THIS CERTIFICATE DOES NOT AFFIRMATIVELY OR NEGATIVELY AMEND, EXTEND OR ALTER THE COVERAGE AFFORDED BY THE POLICIES BELOW. THIS CERTIFICATE OF INSURANCE DOES NOT CONSTITUTE A CONTRACT BETWEEN THE ISSUING INSURER(S), AUTHORIZED REPRESENTATIVE OR PRODUCER, AND THE CERTIFICATE HOLDER.

IMPORTANT: If the certificate holder is an ADDITIONAL INSURED, the policy(ies) must be endorsed. If SUBROGATION IS WAIVED, subject to the terms and conditions of the policy, certain policies may require an endorsement. A statement on this certificate does not confer rights to the certificate holder in lieu of such endorsement(s).

PRODUCER 1433	1-918-584-	1 CT Kathy Bilbrey	PHONE (A/C, No. Ext): 918-764-1619	FAX (A/C, No.):
Arthur J. Gallagher Risk Management Services, Inc.		XISS. kathy bilbrey@ajg.com		
P.O. Box 3142		INSURER/SLAEEORDING COVERAGE	NAIC#	
Tulsa, OK 74101-3142				
Walter P. Bryce, Jr		INSURER A CHARTIS SPECIALTY INS CO	26883	
INSURED		INSURER B COMMERCE & INDUSTRY INS CO	19410	
Acme Environmental, Inc.		INSURER C: COMPSOURCE OK	36188	
dba Acme Products Company		INSURERD:		
2666 N Darlington		INSURER E:		
Tulsa, OK 74115		INSURERF:		

C

24106774

THIS IS TO CERTIFY THAT THE _____ OF INSURANCE LISTED BELOW HAVE BEEN ISSUED TO THE INSURED NAMED ABOVE FOR THE POLICY PERIOD INDICATED. NOTWITHSTANDING ANY REQUIREMENT, TERM OR CONDITION OF ANY CONTRACT OR OTHER DOCUMENT WITH RESPECT TO WHICH THIS CERTIFICATE MAY BE ISSUED OR MAY PERTAIN, THE INSURANCE AFFORDED BY THE POLICIES DESCRIBED HEREIN IS SUBJECT TO ALL THE TERMS,

EXCLUSIONS AND CONDITIONS OF SUCH POLICIES. LIMITS SHOWN MAY HAVE BEEN LIMITED BY					
TYPE OF					
A	GENERAL LIABILITY ☒ GENERAL LIABILITY CLAIMS-MADE ☒ OCCUR L Coverage	9	11/16/11	il, "	\$ 1,000,000 \$ 300,000 \$ 25,000 MED HOV INJURY \$ 1,000,000 OF "F" \$ 2,000,000 AGG IS \$ 1,000,000 BODILY INJURY (P-P) \$ BQ(I) INJURY \$
B	☒ AUTOS LIABILITY ANY AUTO ALL OWNED SCHEDULED AUTOS AUTOS HIRED AUTOS NON-OWNED AUTOS	CA2220618			
A	UMBRELLA LIAB OCCUR EXCESS LIAS	EGU13407727	11/16/11 11/16/12		\$ <,000,000 \$ 4,000,000
C	☒ N/A E.L. E.I. DISEASE-1 E.I. DISEASE POLICY LIMIT	02049322	v-01/1:	01/01/12 X	\$ 1,000,000 \$ 1,000,000 \$ 1,000,000

OF OPERATIONS / LOCATIONS / VEHICLES (Attach ACORD 101, Additional Remarks Schedule, if more space is required)

Liability Blanket Additional Insured provided on endorsement #103124 (10/09) as required by written contract,
Liability-Blanket WOS provided on endorsement #94283 (03/07) as required by contract.

CERTIFICATE HOLDER	CANCELLATION
For Informational Purposes Only	ACORI 25 (20101 aatya laa
	

SHOULD ANY OF THE ABOVE DESCRIBED POLICIES BE CANCELLED BEFORE THE EXPIRATION DATE THEREOF, NOTICE WILL BE DELIVERED IN ACCORDANCE WITH THE POLICY PROVISIONS.

AUTHORIZED REPRESENTATIVE

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NCMS
NATIONAL COMPLIANCE
 Management Service, Inc.
 DOT Department

7 Compound Drive
 Hutchinson, Kansas 67502
 (620) 669-0854 Phone [620]
 668-8430 Fax
 www.nationalcompliance.com

March 10, 2010

ACME PRODUCTS COMPANY
 MR. ANDREW ALTENDORF
 2666 NORTH DARLINGTON AVENUE
 TULSA, OK 74115

MR. ANDREW ALTENDORF

Re: Review of Drug/Alcohol Plan for Compliance with 49 CFR Part 199 and Part 40

As requested by our pipeline operator clients your anti-drug plan and alcohol misuse prevention plan programs have been evaluated per this pipeline operator's regulatory obligation as set forth in Part 40 and 49 CFR Part 199.115 & Part 199.245. The results of the evaluation are as follows:

Your company drug/alcohol plan was found to be satisfactory per the regulations set above.

The timely submission of statistical data is a continuous requirement to maintain your satisfactory status and the report must be received within 30 days after the end of the reporting period. Failure to provide the requested documentation could result in the removal of your satisfactory status with our pipeline clients.

This satisfactory letter indicates that your DOT contractor file has been reviewed and found to meet all the minimum PHMSA and DOT requirements for the NCMS pipeline operators exclusively. This letter cannot be used to satisfy any other pipeline operator requirements and/or any other DOT auditor compliance.

Your company's drug and alcohol file will be periodically reviewed to maintain your satisfactory status.

If you have any questions concerning this evaluation, please feel free to contact this office.

Sincerely,
 DOT Department

Stacey Baughman- Manager
 ph: (620) 668-4428
 email: stacey@nationalcompliance.com

Triola Radke- Auditor
 ph: (620) 668-4423
 email: tricia@nationalcompliance.com

David Higdon- Auditor
 ph: (620) 668-4436
 email: david@nationalcompliance.com

Contractor Monitoring for the Oil and Gas Industry

