



Sunoco Logistics



**Sunoco Pipeline L.P.
Facility Response Plan
Response Plan Sequence Number 968
Philadelphia District – Greensburg Response Zone**

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

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

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1.0 INFORMATION SUMMARY

1.1 Purpose of Plan

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

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

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

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

1.2 Response Zone Information Summary

The information summary for the Philadelphia District – Greensburg Response Zone is presented below:

TABLE 1-1 – PHILADELPHIA DISTRICT – GREENSBURG RESPONSE ZONE INFORMATION SUMMARY

Owner: Sunoco Partners Pipeline L.P. 1818 Market Street, Suite 1500 Philadelphia, PA 19103-1699 Phone: (215) 977-3000 Fax: (215) 977-3409		Operator: Sunoco Pipeline L.P. 1818 Market Street, 15th Floor Philadelphia, PA 19103	
Products Transported:	Finished Products and Ethane		
Qualified Individuals:	Gus Borkland HES&S Manager (215) 977-6136 (Office) (b) (6) (215) 620-5934 (Mobile)		
	Nick Wilkerson Health & Safety Manager (859) 371-4469 (Office) (859) 940-6020 (Mobile)		
	Dave Chalson Vice President Operations (610) 859 - 5754 (Office) (215) 620-0287 (Mobile)		
	Charles Stewart Philadelphia District Area Manager (215) 937-6243 (Office) (215) 669-3222 (Mobile)		
	Wayne Smith Maintenance Supervisor (607) 562-7201 (Office) (607) 426-9867 (Mobile)		
	Matt Studer Operations Manager LPG Assets 216-912-1349 – Office 330-603-3131 - Mobile		

	John Foltz Operations Supervisor (610) 670-3305 (Office) (610) 401-3234 (Mobile)
	Kirk Greenlee Area Manager LPG Assets (313) 292-9839 (Office) (313) 215-2314 (Cell)
Pipeline Description:	The Sunoco Pipeline L.P. Philadelphia District – Greensburg Pipeline System transports product (gasoline, fuel oil and ethane) in Pennsylvania to the Ohio border.
Response Zone:	The Philadelphia District – Greensburg Response Zone includes pipelines and facilities in the following counties of Pennsylvania: Allegheny, Beaver, Blair, Cambria, Lawrence, Indiana, Westmoreland and Washington

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

Line Segments	Description	Counties	Refined Petroleum Products
	(b) (7)(F)	Cambria, Indiana, Westmoreland, Allegheny	Gasoline, Jet Fuel, Fuel Oil
		Westmoreland	Gasoline, Jet Fuel, Fuel Oil
		Allegheny	Gasoline, Jet Fuel, Fuel Oil
		Allegheny	Gasoline, Jet Fuel, Fuel Oil
		Allegheny	Gasoline, Jet Fuel, Fuel Oil

Valve Settings	Valve Number	Name	City
	(b) (7)(F)		
	(b) (7)(F)	Pittsburgh Trap	Pittsburgh
		Allegheny Junction (MOV 1)	Rosedale
		Allegheny Junction (MOV 2)	Rosedale
		Allegheny Junction (MOV 3)	Rosedale
		Allegheny Junction	Rosedale
		Northern Pike	Hall
		Hays Junction	Pitcairn
		Hoss's	Murrysville

(b) (7)(F)		Delmont West Gate (MOV 42)	Delmont
		Delmont East Gate	Delmont
		Loyalhanna Dam West	Slickville
		Loyalhanna Dam East	Mannitte Haven
		West Gate Loyalhanna	Slickville
		East Gate Loyalhanna	Mannitte Haven
		West Conemaugh	Blairsville
		East Conemaugh	Blairsville
		Cramer (Rte. 403)	Cramer
		Vinco	Cresson
		Cresson RR West	Cresson
		Cresson RR East	Cresson
		Alto West Launch Outlet	Altoona
		Alto East Reciever Inlet	Altoona
		Juniata West	Reese
		Juniata East (Belinda's)	Reese
		Broad Top RR West (Rte. 26)	Marklesburg
		Broad Top RR East (Backbone Rd.)	Marklesburg
		Raystown West (7 Points Rd.)	Marklesburg
		Raystown East	Colfax
		Buck Run Rd.	Colfax

(b) (7)(F)		Mt. Union West	Mt. Union
		Rte. 274 New Germantown	New Germantown
		Blue Station Outlet	Mcrea
		Blue Station Inlet	Mcrea
		Conodoguinet West	Carlisle
	(b) (7)(F)		
		Export Junction Trap	Delmont
		Delmont Trap from Export	Delmont
		12" Delmont MOV	Delmont
	(b) (7)(F)		
		Allegheny Spur (Pit valve at Allegheny Junction)	Verona
		Allegheny River East	Verona
		MOV 5113 Allegheny Station	Blawnox
		MOV 5115 Allegheny Station	Blawnox
	(b) (7)(F)		
		Kinder Morgan Station Inlet	Indianola
		Pitt-Oil Trap at ALLE	Blawnox

Facilities	Description	County	# of Tanks
	Allegheny Junction	Allegheny	(b) (7)(F)
	Allegheny Pump Station	Allegheny	
	Altoona Pump Station	Blair	
	Delmont Station	Westmoreland	
	Export Junction	Westmoreland	
	Hays Junction	Allegheny	
	Indianola Junction	Allegheny	
	Indianola Station	Allegheny	
	Loyalhanna Junction	Cambria	
	Pittsburgh Station	Allegheny	
	Vanport Station	Beaver	

- Tank details are provided in the Delmont Terminal FRP and SPCC plans.

LPG ASSETTS

Line Segments	Description	Counties	Refined Petroleum Products
	(b) (7)(F)	Washington	Ethane
		Mahoning, Columbiana, Beaver, Allegheny, Washington	Ethane
		Mahoning, Columbiana, Beaver, Allegheny, Washington	Ethane

LPG ASSETTS

Facilities	Description	County	# of Tanks
	Vanport Tank Farm	Beaver	N/A
Valve Settings	Location	(b) (7)(F)	City
	Houston Meter Facility		Hickory
	Houston-Western Ave.		Hickory
	Millers Run Road		McDonald
	Bowen Road		McDonald
	Candor Road		Bulgar
	Point Pleasant		Bulgar
	Clinton-Frankfort Road		Imperial
	Park Road		Clinton
	Tank Farm Road		Aliquippa
	Green Garden Road		Aliquippa
	Frankfort Road		Monaca
	Mudlick Hollow Road		Beaver
	Vanport Trap Location		Beaver
	Winterburn Road		Beaver Falls
	Burkey Road		Enon Valley
	Boardman Pump Station		Youngstown, Ohio

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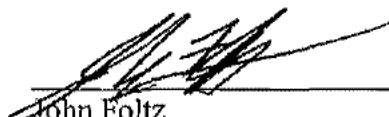
Spill Detection and Mitigation Procedures:	Refer to SECTION 3	
Worst Case Discharge:	(b) (7)(F)	

Statement of Significant and Substantial Harm:	Basis for Operator's Determination of Significant and Substantial Harm • At least one pipeline in the Response Zone is greater than 6 5/8 inches and most pipelines are longer than 10 miles • At least one section of pipeline crosses a river, meeting the requirement for location within one-mile of an environmentally sensitive area • Therefore, the potential to cause significant and substantial harm is present within the entire Response Zone
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1.3 Operator Certification

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

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


John Foltz
Operations Supervisor
SUNOCO PIPELINE, L.P.

2.0 **NOTIFICATION PROCEDURES**

2.1 Notification Overview

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

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

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

2.2 Information Required for Notifications

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

Name of pipeline:

Time of discharge:

Location of discharge:

Name of oil involved:

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

Estimated volume of oil discharged:

Weather conditions on scene:

Actions taken or planned by persons on scene:

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

TABLE 2-1 – FACILITY RESPONSE TEAM CONTACT INFORMATION

FACILITY RESPONSE TEAM		
Name/Title	Contact Information	Response Time
Charles Stewart Philadelphia District Area Manager Qualified Individual	(215) 937-6243 (Office) (215) 669-3222 (Mobile)	4-6 hours
Wayne Smith Maintenance Supervisor Qualified Individual	(607) 562-7201 (Office) (607) 426-9867 (Mobile)	6-8 hours
Jerry Higgins Senior Field Technician Supervisor Qualified Individual	(610) 670-3218 (Office) (610) 858-3838 (Mobile)	3-5 hours
John Foltz Operations Supervisor Qualified Individual	(610) 670-3305 (Office) (610) 401-3234 (Mobile)	3-5 hours
Matt Studer Operations Supervisor LPG Assets Qualified Individual	216-912-1349 – Office 330-603-3131 - Mobile	3 – 5 hours
Kirk Greenlee Area Manager LPG Assets Qualified Individual	(313) 292-9839 (Office) (313) 215-2314 (Cell)	5 – 7 hours

TABLE 2-2 – ERP CONTACT INFORMATION

EMERGENCY RESPONSE PERSONNEL CONTACT INFORMATION			
Name/Title	Contact Information	Response Time	Responsibilities During Response Action
Charles Stewart Philadelphia District Area Manager Qualified Individual	(215) 937-6243 (Office) (215) 669-3222 (Mobile)	4-6 hours	Incident Commander
Gus Borkland HES&S Manager Qualified Individual	(215) 977-6136 Office (215) 620-5934 Mobile	4-6 hours	Operations
Dave Chalson Vice President Qualified Individual	(610) 859-5754 Office (215) 205-1850 Mobile	3-5 hours	Operations/Planning
John Foltz Operations Supervisor Qualified Individual	(610) 670-3305 Office (610) 401-3234 Mobile	3-5 hours	Planning
Nick Wilkerson Health & Safety Manager Qualified Individual	(859) 371-4469 (Office) (859) 940-6020 (Mobile)	3-6 hours	Logistics
Dennis Kelly Health and Safety Specialist	(412) 784-3481 Office (412) 855-7700 Mobile	2-4 hours	Safety
Christopher Embry Emergency Response Coordinator	(610) 670-3237 Office (215) 478-4144 Mobile	3-5 hours	Environmental Liaison
Matt Studer Operations Manager LPG Assets Qualified Individual	216-912-1349 – Office 330-603-3131 - Mobile	3 – 5 hours	Planning
Kirl Greenlee Area Manager LPG Assets Qualified Individual	(313) 292-9839 (Office) (313) 215-2314 (Cell)	5-7 hours	Incident Commander
Albert Kravatz DOT Compliance Coordinator	(215) 937-6299 Office (215) 779-3001 Mobile	4-6 hours	Regulatory Liaison

TABLE 2-3 – REGULATORY AGENCY CONTACT INFORMATION

REGULATORY AGENCY CONTACT INFORMATION		
Agency	Phone Number	Reporting Requirements
Federal Agencies		
National Response Center (NRC) <i>NRC will contact all other federal agencies including USDOT/PHMSA and EPA</i>	(800)424-8802 or (202) 267-2675	Any spill on water. Telephonic notification is required within 2 hours following the discovery of a release that resulted in any discharge to water

U.S. Department of Transportation/Pipeline Hazardous Materials Safety Administration (PHMSA)	(800)424-8802 or (202) 267-2675	<u>Telephonic Notification</u> At the earliest practicable moment following discovery of a release of the hazardous liquid resulting in an event described above, the operator shall give notice of any failure that: • Caused a death or a personal injury requiring hospitalization • Resulted in either a fire or explosion not intentionally set by the operator • Caused estimated property damage, including cost of clean up and recovery, value of lost product, and damage to the property of the operator or others, or both, exceeding \$50,000 • Resulted in pollution of any stream, river, lake, reservoir, or other similar body of water that violated applicable water quality standards, caused a discoloration of the surface of the water or adjoining shoreline, or deposited a sludge or emulsion beneath the surface of the water or upon adjoining shorelines or • In the judgment of the operator was significant even though it did not meet the criteria of any of the above. <u>Written Reporting</u> A 7000-1 report is required within 30 days after discovery of the accident for each failure in a pipeline system regulated by DOT 195 in which there is a release of the hazardous liquid transported resulting in any of the following:
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U.S. Department of Transportation/Pipeline Hazardous Materials Safety Administration (PHMSA) Continued...		• Explosion or fire not intentionally set by the operator • Release of 5 gallons or more of hazardous liquid except that no report is required for a release of less than 5 barrels resulting from a pipeline maintenance activity if the release is: • Not otherwise reportable under this section • Not on water • Confined to company property or pipeline right-of-way and • Cleaned up promptly • Death of any person • Personal injury necessitating hospitalization • Estimated property damage, including cost of clean-up and recovery, value of lost product, and damage to the property of the operator or others, or both, exceeding \$50,000. • A supplemental report shall be filed within 30 days of receiving any changes in the information reported or additions to the original DOT 7000-1 report.
State Agencies		
<i>Pennsylvania</i>		
Pennsylvania Department of Environmental Protection Region I – Norristown (Southeast) Region II – Wilkes-Barre (Northeast) Region III – Harrisburg (S. Cent.) Region IV – Williamsport (N. Cent.) Region V – Pittsburgh (Southwest) Region VI – Meadville (Northwest)	(800) 541-2050 In-state (717) 787-5027 Out of State (484) 250-5900 (570) 826-2511 (877) 333-1904 (570) 327-3636 (412) 442-4000 (800) 373-3398	Any oil spill of 5 gallons or more into waters of the commonwealth or onto lands from which it might flow or drain into waters of the commonwealth (waters of the commonwealth include surface and underground water). SEE DISTRICT MAP IN APPENDIX B ***If possible, provide notification Within 2 Hours to known downstream water users who could be potentially affected. If this cannot be completed, request that the County Emergency Mgmt. Agency complete this task***
Pennsylvania Emergency Management Agency (24 hr)	(800) 424-7362	

TABLE 2-4 – EMERGENCY SERVICES CONTACT INFORMATION

EMERGENCY SERVICES BY COUNTY	
Organization	Phone Number
<i>Pennsylvania</i>	
Allegheny County, PA Police LEPC	911 (412) 473-2550
Beaver County, PA Police LEPC	911 (724) 775-1700
Blair County, PA Police LEPC	911 (814) 940-5905
Cambria County, PA Police LEPC	911 (814) 534-4342
Indiana County, PA Police LEPC	911 (724) 349-9300
Lawrence County, PA Police LEPC	911 (724) 658-7485
Washington County, Police LEPC	911 (724) 223-4712
Westmoreland County, PA Police LEPC	911 (724) 838-4305

TABLE 2-5 - CONTRACTOR CONTACT INFORMATION

CONTRACTOR INFORMATION	
Organization	Phone Number
USCG Classified OSRO's	
Lewis Environmental Group Royersford , PA	(610) 495-6695 (610) 495-6697 (Fax)
Clean Venture, Inc.	(908)355-5800 (856) 863-8778
McCutcheon Enterprises	(724) 568-3623
Northridge Group, Inc. Northumberland, PA.	570-473-3219

React Environmental Services, Inc. Philadelphia , PA	(800) 326-2439 (215) 729-2777 (215) 729-8678(Fax)
National Response Corporation	(800) 899-4672
Specialized Response Service (SRS) LPG Assets	(877) 506-0025
Wildlife Rehabilitation	
Tri-State Bird Rescue Research Center, Newark, DE	(302) 737-7241 (800) 710-0695

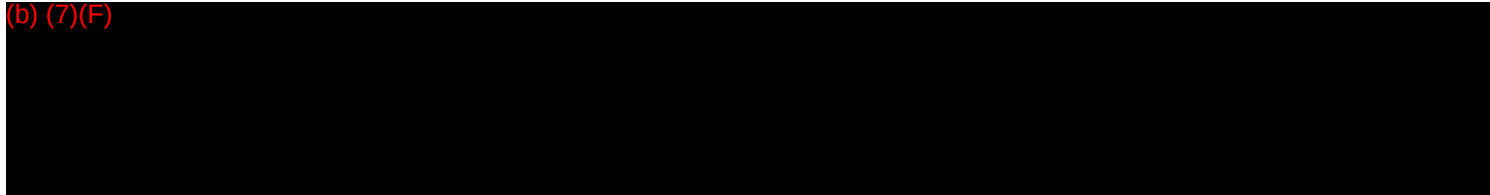
3.0 **SPILL DETECTION AND ON-SCENE SPILL MITIGATION PROCEDURES**

3.1 Spill Detection

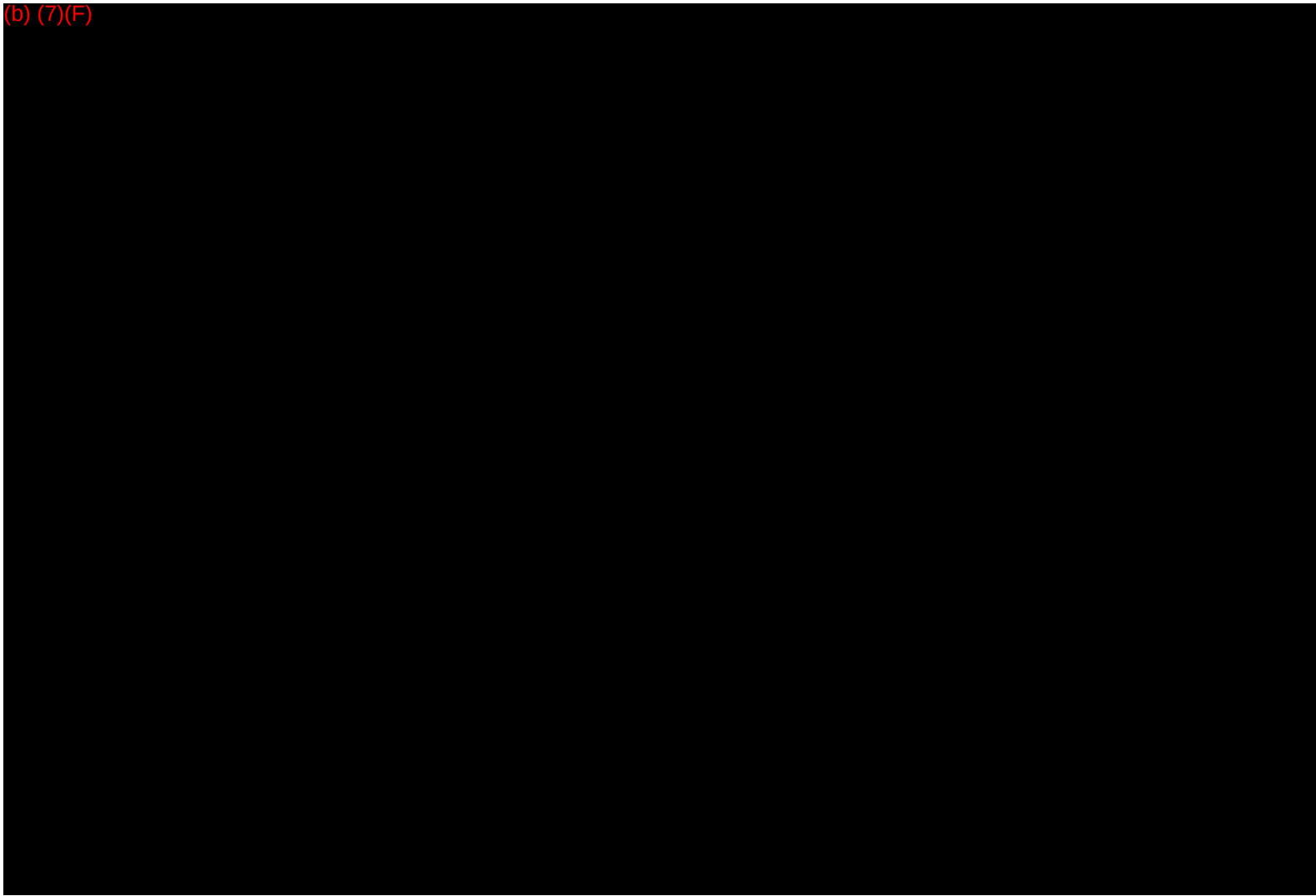
Detection of a discharge from a pipeline system may occur in a number of ways including:

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

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- **Training**

All operators are compliant with DOT 195 Operator Qualification Requirements.

Visual Detection by Company Personnel

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

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

TABLE 4.1 provides a checklist for initial response actions.

Visual Detection by the Public

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

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

Pipeline Shutdown

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

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

3.2 Spill Mitigation Procedures

Each spill mitigation situation is unique and must be treated according to the circumstance present. In every situation, however, **personnel safety must be assessed as the first priority**. The potential for ignition and/or toxic exposure must be promptly evaluated. Response to a LPG release will be different than a response to a refined product release.

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

TABLE 3-1 – SPILL MITIGATION PROCEDURES REFINED PRODUCTS

TYPE	MITIGATION PROCEDURE REFINED PRODUCTS
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.

TYPE	MITIGATION PROCEDURE REFINED PRODUCTS
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.
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).

TABLE 3-1 – SPILL MITIGATION PROCEDURES LPG

TYPE	MITIGATION PROCEDURE - LPG
Failure of Transfer Equipment	1. Personnel safety is the first priority. Evacuate nonessential personnel or personnel at high risk. 2. Terminate transfer operations. 3. Eliminate sources of vapor cloud ignition by shutting down all engines and motors. 4. Follow EPP-105 Guidelines for LPG Emergency Response 5. Establish a safe perimeter.
Piping Rupture/Leak (under pressure and no pressure)	1. Personnel safety is the first priority. Evacuate nonessential personnel or personnel at high risk. 2. Shut down pumps. Close the closest block valves on each side of the rupture.. 3. Shut down source of vapor cloud ignition by shutting down all engines and motors. 4. If piping is leaking and under pressure, then relieve pressure by flaring. Follow EPP-105. Then repair line according to established procedures.
Fire/Explosion	1. Personnel safety is the first priority.

	Evacuate nonessential personnel or personnel at risk of injury. 2. Notify local fire and police departments. 3. Do not attempt to extinguish fire. 4. Shut down transfer or pumping operation. Attempt to divert or stop flow of product to the hazardous area (if it can be done safely). 5. Eliminate sources of vapor cloud ignition shutting down all engines and motors. 6. Allow fire professionals to protect adjacent property and assets.
Manifold Failure	1. Personnel safety is the first priority. Evacuate nonessential personnel or personnel at high risk. 2. Terminate transfer operations immediately. 3. Isolate the damaged area by closing the closest valve that can be reached safely valves on both sides of the leak/rupture. 4. Shut down source of vapor cloud ignition by shutting down all engines and motors.

3.3 Response Equipment

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

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

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

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

Each listed OSRO has their own response equipment, a minimum of 1,000 feet of containment boom, absorbents, boats, and vacuum trucks. Lists of the OSRO's equipment resources may be found in their services contract. OSRO response

equipment is inspected and refurbished after every use which is typically more than once a week. The primary OSRO's equipment is checked monthly or at a minimum of once every two months. Sunoco Pipeline has ensured by contract the availability of personnel and equipment necessary to respond, to the maximum extent practicable, to a worst case discharge or a substantial threat of such discharge in this response zone.

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

4.0 RESPONSE ACTIVITIES

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

This checklist is to be used as and where appropriate depending on the nature and extent of the incident.

Table 4-1

RESPONSE ACTION	PERSONNEL TAKING ACTION	DATE/TIME ACTION TAKEN
DOCUMENT ALL ACTIONS TAKEN		
First Person to Discover Spill		
Immediately notify Qualified Individual and Operations Control Center or posted emergency contacts. Take appropriate action to protect life and ensure safety of personnel.		
Immediately shut down terminal operations (if applicable). (b) (7)(F)		
Secure the scene. Isolate the area and assure the safety of people and the environment. Keep people away from the scene and outside the safety perimeter.		
Advise personnel in the area of any potential threat and/or initiate evacuation procedures.		
Qualified Individual		
Assume role of Incident Commander until relieved.		
Conduct preliminary assessment of health and safety hazards.		
Request medical assistance if an injury has occurred.		
Evacuate nonessential personnel, notify emergency response agencies to provide security, and evacuate surrounding area (if		

potentially necessary).		
Make or delegate appropriate regulatory notifications. • National Response Center • Appropriate State Agency		
Call out spill response contractors (See List in TABLE 2-5)		
If safe to do so, direct facility responders to shut down potential ignition sources in the vicinity of the spill, including motors, electrical pumps, electrical power, etc. Keep drivers away from truck rack if spill occurs there.		
If safe to do so, direct facility responders to shut down and control the source of the spill. Be aware of potential hazards associated with product and ensure that flammable vapor concentrations are within safe atmosphere before sending personnel into the spill area.		

RESPONSE ACTION	PERSONNEL TAKING ACTION	DATE/TIME ACTION TAKEN
Qualified Individual (Continued)		
If safe to do so, direct facility responders to stabilize and contain the situation. This may include berming or deployment of containment and/or sorbent boom.		
For low flash oil (<100°F), consider applying foam over the oil, using water spray to reduce vapors, grounding all equipment handling the oil, and using non-sparking tools.		
If there is a potential to impact shorelines, consider lining shoreline with sorbent or diversion boom to reduce impact.		
Notify Local Emergency Responders. Obtain the information necessary to complete the Accident Report - Hazardous Liquid Pipeline Systems (APPENDIX B) and phone this information to the HES Manager.		
On-Scene Coordinator		
Activate all or a portion of ERP (as necessary). Liaison Officer will maintain contact with notified regulatory agencies.		
Ensure the ERP has mobilized spill response contractors (if necessary). It is much better to demobilize equipment and personnel if not needed than to delay contacting them if they are needed.		
Document all response actions taken, including notifications, agency/media meetings, equipment and personnel mobilization and deployment, and area impacted.		
Water Based Spills: Initiate spill tracking and surveillance operations utilizing information in SECTION 4.2 . Determine extent of pollution via surveillance aircraft or vehicle. Estimate volume of spill utilizing information in SECTION 4.3 . Send photographer /videographer if safe.		
Land Based Spills: Initiate spill tracking and surveillance if applicable.		
SECONDARY RESPONSE ACTIONS (Refer to ERP job descriptions in APPENDIX D)		

4.2 Spill Tracking and Surveillance

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

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

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

TABLE 4-2 – SPILL SURVEILLANCE CHECKLIST

SPILL SURVEILLANCE CHECKLIST	
General Information	
Date:	Tidal or river stage (flood, ebb, slack, low water):
Time:	On-Scene Weather Conditions:
Incident Name:	Platform (helicopter, fixed-wing aircraft, boat, shore):
Observers Name:	Flight path/trackline:
Observers' Affiliation:	Altitude where observation taken:
Location of Source:	Areas not observed (i.e. foggy locations, restricted air spaces, shallow water areas):
Oil Observations	
Slick location(s):	Color and appearance (i.e. rainbow, dull or silver sheen, black or brown in color or mousse):
Slick dimensions:	Percent coverage:
Orientation of slick(s):	Is oil recoverable (Y/N)?:
Distribution of oil (i.e. windrows, streamers, pancakes or patches):	
Considerations	
• During surveillance, go beyond known impacted areas to check for additional oil spill sites • Include the name and phone number of the person making the observations • Clearly describe the locations where oil is observed and the areas where no oil has been seen	
Other Observations	

4.3 Estimating Spill Volumes

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

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

Some rapid methods to estimate spill size are:

- Transfer operations: The Control Center will determine volumes using all available information, which can include but not limited to: Multiply the pumping rate by the elapsed time that the leak was in progress, plus the drainage volume of the line between the two closest valves or isolation points (volume loss = pump rate [bbls/min] x elapsed time [min] + line contents [bbl])
- Tank overfills: The Control Center will determine volumes using all available information, which can include but not limited to: Elapsed time multiplied by the pumping rate
- Visual assessment of the surface area and thickness (**TABLE 4-3**); **this method may yield unreliable results because:**
 - Interpretation of sheen color varies with different observers
 - Appearance of a slick varies depending upon amount of available sunlight, sea-state, and viewing angle
 - Different products may behave differently, depending upon their properties

TABLE 4-3 - OIL THICKNESS ESTIMATION CHART

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

4.4 Emergency Response Personnel

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

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

4.5 Incident Command System/Unified Command

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

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

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

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

5.0 TRAINING PROCEDURES

5.1 Exercise Requirements and Schedules

The Company participates in the National Preparedness for Response Exercise Program (PREP) in order to satisfy the exercise requirements of the PHMSA and EPA, following the Sunoco Logistics “PREP Training & Record Guide, EPP-101. The Facility Manager is responsible for the following aspects:

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

5.2 Post Incident Review

In the case of the following spills from a 49 CFR Part 195 regulated pipeline, a Standard Incident Debriefing Form as noted in **TABLE 5-3** will be completed:

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

In the case of spills from other facilities a Standard Incident Debriefing Form as noted in **TABLE 5.3** will be completed on an as determined basis which will be dictated by individual circumstances.

Pertinent facility personnel involved in the incident shall be debriefed (by the Company) within the calendar quarter after termination of operations. A Standard Incident Debriefing Form is provided in **TABLE 5.3**. The primary purpose of the post-incident review is to identify actual or potential deficiencies in the Plan and determine the changes required to correct the efficiencies.

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

TABLE 5-3 – STANDARD INCIDENT DEBRIEFING (SELF ASSESSMENT) FORM

#

/17-11: _____

#

Date: _____

Check as appropriate**Type of Exercise:**Table Top Drill ☐ Equipment Deployment ☐ Emergency Procedures ☐ Actual Spill ☐Exercise was: Announced ☐ Unannounced ☐Scenario: Average Most Probable ☐ Maximum Most Probable ☐ Worst Case ☐

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

Note: Include additional pages if necessary.

Participants/Evaluation Team**Company**

(Attach roster sheet if required)

Qualified Individuals:

Date Evaluation Conducted: _____

Section II. Exercise / Incident Response Evaluation

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

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

Knowledge of Facility Response Plan 1 2 3 4 5

Comments:

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

Notification Phase: 1 2 3 4 5

Comments:

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

Communications system: 1 2 3 4 5

Comments:

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

Response Efforts: 1 2 3 4 5

Comments:

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

OSRO Performance : 1 2 3 4 5

Comments:

- Did the OSRO respond in a timely manner?
- Did the OSRO respond with the proper resources?
- Did the OSRO have enough resources?
- Was the OSRO's performance adequate?
- Were the OSRO's personnel knowledgeable in their assigned tasks?
- Was the OSRO's equipment in good working order?

Coordination with Agencies: 1 2 3 4 5

Comments:

- Did regulatory agencies come to the spill site?
- Did regulatory agencies call about the spill?
- Who from the ICS team interacted with the agencies?
- Were all of the appropriate agencies notified?
- Who made the agency notification?
- Was all of the needed information made available to the person making the notification?

Ability to access sensitive area information 1 2 3 4 5

Comments:

- Did the plan contain all of the available sensitive information needed?
- Was the sensitive area information available to the people in the field?
- Are updates to the sensitive information required?

Section III. Corrective Actions

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

Note: Include additional pages if necessary

5.3 Training Program

Training requirements are presented in Table 5-7, below:

TABLE 5-7 – TRAINING REQUIREMENTS

Training Type	Training Characteristics
Training in Use of Oil Spill Plan	• All field personnel will be trained to properly report/monitor spills • Plan will be reviewed annually with all employees and contract personnel • A record of Personnel Response Training will be maintained.
OSHA Training Requirements	• 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 8 hours of actual field experience • Spill responders having potential exposure to hazardous substances at levels exceeding permissible exposure limits must have 40 hours of initial training offsite and 24 hours of actual field experience • On-site management/supervisors required to receive same training as equipment operators/general laborers plus 8 hours of specialized hazardous waste management training • Managers/employees require 8 hours of annual refresher training
Spill Management Team Personnel Training	• Will follow EPP-101
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 Plan • Training records will be retained.

Training Type	Training Characteristics
Emergency Response Training	The Company has established and conducts a continuing training program to instruct emergency response personnel to: • Carry out emergency procedures established under 195.402 that relate to their assignments; • Know the characteristics and hazards of the hazardous liquids or carbon dioxide transported, including, in case of flammable HVL, flammability of mixtures with air, odorless vapors, and water reactions; • Recognize conditions that are likely to cause emergencies, predict the consequences of facility malfunctions or failures and hazardous liquids or carbon dioxide spills, and take appropriate corrective action; • Take steps necessary to control any accidental release of hazardous liquid or carbon dioxide and to minimize the potential for fire, explosion, toxicity, or environmental damage; and • Learn the proper use of fire-fighting procedures and equipment, fire suits, and breathing apparatus by utilizing, where feasible, a simulated pipeline emergency condition. At intervals not exceeding 15 months, but at least once each calendar year, the Company shall: • Review with personnel their performance in meeting the objectives of the emergency response training program set forth in 195.403(a), and • Make appropriate changes to the emergency response training program as necessary to ensure that it is effective. The Company requires and verifies that its supervisors maintain a thorough knowledge of that portion of the emergency response procedures established under 195.402 for which they are responsible to ensure compliance.

Training Type	Training Characteristics
Minimum requirements for Operator Qualification of individuals performing covered tasks on a pipeline facility	The Company has a written Operator Qualification program that includes provisions to: • Identify covered tasks; • Ensure through evaluation that individuals performing covered tasks are qualified; • Allow individuals that are not qualified pursuant to 49 CFR 195 Subpart G to perform a covered task if directed and observed by an individual that is qualified; • Evaluate an individual if the operator has reason to believe that the individual's performance of a covered task contributed to an accident as defined in Part 195; • Evaluate an individual if the operator has reason to believe that the individual is no longer qualified to perform a covered task; • Communicate changes that affect covered tasks to individuals performing these covered tasks; and • Identify those covered tasks and the intervals at which evaluation of the individual's qualifications is needed. RECORDS Each operator shall maintain records that demonstrate compliance with 49 CFR Part 195, Subpart G. Qualification records shall include: • Identification of qualified individuals • Identification of covered tasks the individual is qualified to perform • Date(s) of current qualification Records supporting an individual's current qualification shall be maintained while the individual is performing the covered task. Records of prior qualification and records of individuals no longer performing covered tasks shall be retained for a period of five years.

6.0 **WORST CASE DISCHARGE SUMMARY**

6.1 Worst Case Discharge Scenario

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

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

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

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

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

6.2 Planning Volume Calculations

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

DOT/PHMSA Portion of Pipeline/Facilities

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

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

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

TABLE 6-1 PHMSA PERCENT REDUCTION ALLOWED

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

Note: * - The tanks do not have tertiary containment

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

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

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

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

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

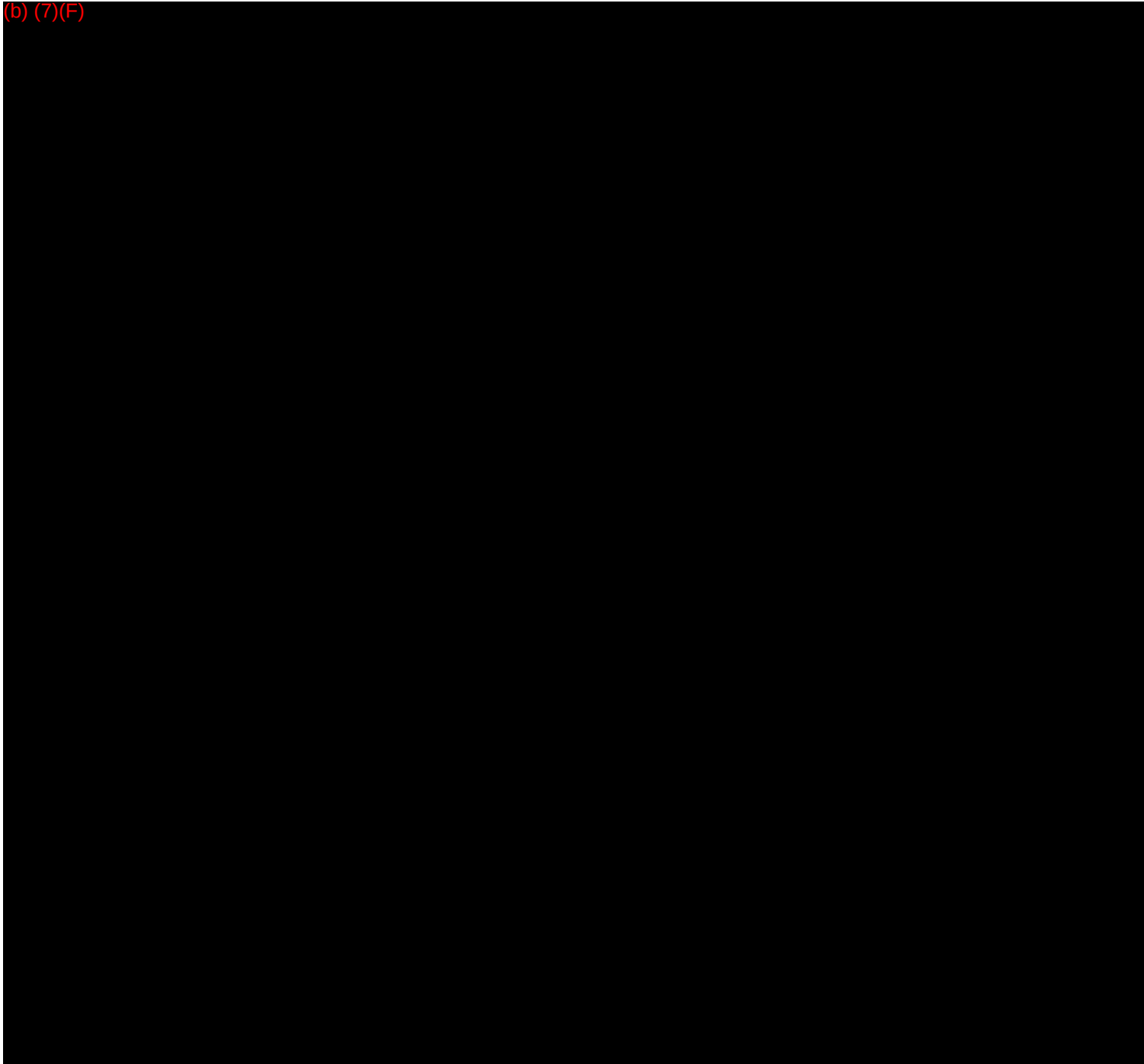
The maximum historic discharge is not applicable for WCD covered by this plan. Given below are the tank and pipeline WCD calculations for this plan.

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

(b) (7)(F)



(b) (7)(F)



6.4 Product Characteristics and Hazards

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

- Finished Petroleum Products
- LPG products (ethane)

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

COMMON NAME	MSDS NAME	HEALTH HAZARD	FLASH POINT	SPECIAL HAZARD	REACTIVITY	HEALTH HAZARD WARNING STATEMENT
Fuel Oil	Fuel Oil 2; Road Diesel; Home Heating Oil; Low Sulfur Diesel (LSD); Ultra Low Sulfur Diesel(ULSD)	0	2	C	0	Long term, repeated exposure may cause skin cancer.
Gasoline	Unleaded Gasoline; Transmix	1	4	C	0	Long term, repeated exposure may cause cancer, blood, kidney and nervous system damage, and contains benzene.
Jet Fuel	Kerosene; Aviation Fuel; Jet-A; JP-5; JP-8; Aviation Gas	1	2	C	0	Long term, repeated exposure may cause cancer.
Ethane	Ethane	1	4	A, P	0	Easily ignited and will form explosive mixtures with air; may cause dizziness or asphyxiation; toxic if inhaled at high concentrations; skin contact with gas or liquid may cause burns; fire may produce irritating or toxic gases
Health Hazard	4 = Extremely Hazardous 3 = Hazardous 2 = Warning 1 = Slightly Hazardous 0 = No Unusual Hazard			Fire Hazard (Flash Point)	4 = Below 73° F, 22° C 3 = Below 100° F, 37° C 2 = Below 200° F, 93° C 1 = Above 200° F, 93° C 0 = Will not burn	
Special Hazard	A = Asphyxiant C = Contains Carcinogen W = Reacts with Water Y = Radiation Hazard COR = Corrosive OX = Oxidizer H2S = Hydrogen Sulfide P = Under Pressure			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	

T = Hot Material	
------------------	--

7.0 RESPONSE ZONE MAPS AND ASSOCIATED REFERENCE MATERIAL

7.1 Map Overview

The Pennsylvania System Overview Map, Greensburg Response Zone Area Map and multiple Pipeline Sensitivity Maps are presented in **APPENDIX E**.

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

The following maps are included in this section:

- HCA System Map Pennsylvania
- Greensburg Response Zone Area Map

8.0 RESPONSE PLAN REVIEW AND UPDATE PROCEDURES

8.1 Facility Response Plan Review Guidelines

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

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

CONDITIONS REQUIRING REVISIONS AND SUBMISSIONS

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

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

Appendix A

TABLE A.1 - DOT/PHMSA CROSS REFERENCE MATRIX

OPA 90 REQUIREMENTS (49 CFR 194)	LOCATION
Information Summary (Section 1)	
For the core plan:	N/A
Name and address of operator	SECTION 1.1
For each Response Zone which contains one or more line sections that meet the criteria for determining significant and substantial harm (§194.103), listing and description of Response Zones, including county(s) and state(s)	TABLE 1.2
For each Response Zone appendix:	N/A
Information summary for core plan	SECTION 1.1
QI names and telephone numbers, available on 24-hr basis	TABLE 1.1
Description of Response Zone, including county(s) and state(s) in which a worst case discharge could cause substantial harm to the environment	TABLE 1.1, TABLE 1.2
List of line sections contained in Response Zone, identified by milepost or survey station or other operator designation	TABLE 1.2
Basis for operator's determination of significant and substantial harm	TABLE 1.2
The type of oil and volume of the worst case discharge	TABLE 1.2, SECTION 6.0
Certification that the operator has obtained, through contract or other approved means, the necessary private personnel and equipment to respond, to the maximum extent practicable, to a worst case discharge or threat of such discharge	SECTION 1.3
Notification Procedures (Section 2)	
Notification requirements that apply in each area of operation of pipelines covered by the plan, including applicable state or local requirements	SECTION 2
Checklist of notifications the operator or Qualified Individual is required to make under the response plan, listed in the order of priority	TABLE 2.2, TABLE 2.3
Name of persons (individuals or organizations) to be notified of discharge, indicating whether notification is to be performed by operating personnel or other personnel	TABLE 2.2, TABLE 2.3
Procedures for notifying Qualified Individuals	SECTION 2.1, TABLE 2.2
Primary and secondary communication methods by which notifications can be made	TABLE 2.3

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	SECTION 2.2
Spill Detection and On-Scene Spill Mitigation Procedures (Section 3)	
Methods of initial discharge detection	SECTION 3.1
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 3.2, TABLE 3.1
- 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 - Identification of the availability, location, and contact phone numbers to obtain equipment for response activities on a 24-hour basis - Identification of personnel and their location, telephone numbers, and responsibilities for use of equipment in response activities on a 24-hour basis	SECTION 3.3, APPENDIX C
Response Activities (Section 4)	
Responsibilities of, and actions to be taken by, operating personnel to initiate and supervise response actions pending the arrival of the Qualified Individual or other response resources identified in the response plan	SECTION 4.1, TABLE 4.1
Qualified Individual's responsibilities and authority, including notification of the response resources identified in the response plan	SECTION 4.1, TABLE 4.1
Procedures for coordinating the actions of the operator or Qualified Individual with the action of the OSC responsible for monitoring or directing those actions	TABLE 4.1
Oil spill response organizations (OSRO) available through contract or other approved means, to respond to a worst case discharge to the maximum extent practicable	TABLE 2.5, APPENDIX C

OPA 90 REQUIREMENTS (49 CFR 194)	LOCATION
- 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 C
List of Contacts (Section 5)	
List of persons the Plan requires the operator to contact	TABLE 1.1, TABLE 2.1
Qualified individuals for the operator areas of operation	TABLE 1.1
Applicable insurance representatives or surveyors for the operator's areas of operation	TABLE 1.1
Persons or organizations to notify for activation of response resources	TABLE 2.1, TABLE 2.2, TABLE 2.4
Training Procedures (Section 6)	
Description of training procedures and programs of the operations	SECTION 5
Drill Procedures (Section 7)	
Announced and unannounced drills	TABLE 5.2
- 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 spill management team (SMT) tabletop drills conducted yearly - Oil spill removal organization field equipment deployment drills conducted yearly - A drill that exercises entire response plan for each Response Zone, would be conducted at least once every three years	TABLE 5.2
Response Plan Review and Update Procedures (Section 8)	
Procedures to meet §194.121	SECTION 8.1
Procedures to review plan after a worst case discharge and to evaluate and record the plan's effectiveness	SECTION 8.1
Response Zone Appendices (Section 9)	
Name and telephone number of the qualified individual	TABLE 1.1

Notification procedures	SECTION 2
OPA 90 REQUIREMENTS (49 CFR 194)	LOCATION
Spill detection and mitigation procedures	SECTION 3.0
Name, address, and telephone number of oil spill response organizations	TABLE 2.5
- Response activities and response resources including— - Equipment and supplies necessary to meet §194.115, and - The trained personnel necessary to sustain operation of the equipment and to staff the oil spill removal organization and spill management team for the first 7 days of the response	TABLE 2.5, APPENDIX C
Names and telephone numbers of Federal, state and local agencies which the operator expects to assume pollution response responsibilities	TABLE 2.3, TABLE 2.4
The worst case discharge volume	SECTION 6.0
The method used to determine the worst case discharge volume, with calculations	SECTION 6.3
- 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	APPENDIX E
Piping diagram and plan-profile drawing of each line section; (may be kept separate from the response plan if the location is identified)	APPENDIX E
- 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	SECTION 6.4

Appendix B

*12. Were there fatalities? ☐ Yes ☐ No If Yes, specify the number in each category: *12.a Operator employees <u> </u> / <u> </u> / <u> </u> / <u> </u> / <u> </u> *12.b Contractor employees working for the Operator <u> </u> / <u> </u> / <u> </u> / <u> </u> / <u> </u> *12.c Non-Operator emergency responders <u> </u> / <u> </u> / <u> </u> / <u> </u> / <u> </u> *12.d Workers working on the right-of-way, but NOT associated with this Operator <u> </u> / <u> </u> / <u> </u> / <u> </u> / <u> </u> *12.e General public <u> </u> / <u> </u> / <u> </u> / <u> </u> / <u> </u> 12.f Total fatalities (sum of above) <u> </u> / <u> </u> / <u> </u> / <u> </u> / <u> </u>	*13. Were there injuries requiring inpatient hospitalization? ☐ Yes ☐ No If Yes, specify the number in each category: *13.a Operator employees <u> </u> / <u> </u> / <u> </u> / <u> </u> / <u> </u> *13.b Contractor employees working for the Operator <u> </u> / <u> </u> / <u> </u> / <u> </u> / <u> </u> *13.c Non-Operator emergency responders <u> </u> / <u> </u> / <u> </u> / <u> </u> / <u> </u> *13.d Workers working on the right-of-way, but NOT associated with this Operator <u> </u> / <u> </u> / <u> </u> / <u> </u> / <u> </u> *13.e General public <u> </u> / <u> </u> / <u> </u> / <u> </u> / <u> </u> 13.f Total injuries (sum of above) <u> </u> / <u> </u> / <u> </u> / <u> </u> / <u> </u>
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14. Was the pipeline/facility shut down due to the Accident?
☐ Yes ☐ No ➡ Explain: _____

If Yes, complete Questions 14.a and 14.b: *(use local time, 24-hr clock)*

14.a Local time and date of shutdown / / / / / / / /

Hour
Month
Day
Year

14.b Local time pipeline/facility restarted / / / / / / / /

Hour
Month
Day
Year

☐ Still shut down*
*(*Supplemental Report required)*

*15. Did the commodity ignite? ☐ Yes ☐ No

*16. Did the commodity explode? ☐ Yes ☐ No

17. Number of general public evacuated: / / / / / / /

18. Time sequence: *(use local time, 24-hour clock)*

18.a Local time Operator identified Accident / / / / / / / /

Hour
Month
Day
Year

18.b Local time Operator resources arrived on site / / / / / / / /

Hour
Month
Day
Year

PART C – ADDITIONAL FACILITY INFORMATION	
*1. Is the pipeline or facility: ☐ Interstate ☐ Intrastate	
*2. Part of system involved in Accident: (select only one) ☐ Onshore Breakout Tank or Storage Vessel, Including Attached Appurtenances ➡ ☐ Atmospheric or Low Pressure ☐ Pressurized ☐ Onshore Terminal/Tank Farm Equipment and Piping ☐ Onshore Equipment and Piping Associated with Belowground Storage ☐ Onshore Pump/Meter Station Equipment and Piping ☐ Onshore Pipeline, Including Valve Sites ☐ Offshore Platform/Deepwater Port, Including Platform-mounted Equipment and Piping ☐ Offshore Pipeline, Including Riser and Riser Bend	
*3. Item involved in Accident: (select only one) ☐ Pipe ➡ Specify: ☐ Pipe Body ☐ Pipe Seam 3.a Nominal diameter of pipe (in): <u> / / / / / </u> 3.b Wall thickness (in): <u> / / / / / </u> 3.c SMYS (Specified Minimum Yield Strength) of pipe (psi): <u> / / / / / </u> 3.d Pipe specification: _____ 3.e Pipe Seam ➡ Specify: ☐ Longitudinal ERW - High Frequency ☐ Single SAW ☐ Flash Welded ☐ Longitudinal ERW - Low Frequency ☐ DSAW ☐ Continuous Welded ☐ Longitudinal ERW – Unknown Frequency ☐ Furnace Butt Welded ☐ Spiral Welded ERW ☐ Spiral Welded SAW ☐ Spiral Welded DSAW ☐ Lap Welded ☐ Seamless ☐ Other _____ 3.f Pipe manufacturer: _____ 3.g Year of manufacture: <u> / / / / </u> 3.h Pipeline coating type at point of Accident ➡ Specify: ☐ Fusion Bonded Epoxy ☐ Coal Tar ☐ Asphalt ☐ Polyolefin ☐ Extruded Polyethylene ☐ Field Applied Epoxy ☐ Cold Applied Tape ☐ Paint ☐ Composite ☐ None ☐ Other _____ ☐ Weld, including heat-affected zone ➡ Specify: ☐ Pipe Girth Weld ☐ Other Butt Weld ☐ Fillet Weld ☐ Other _____ ☐ Valve ☐ Mainline ➡ Specify: ☐ Butterfly ☐ Check ☐ Gate ☐ Plug ☐ Ball ☐ Globe ☐ Other _____ 3.i Mainline valve manufacturer: _____ 3.j Year of manufacture: <u> / / / / </u> ☐ Relief Valve ☐ Auxiliary or Other Valve ☐ Pump ☐ Meter/Prover ☐ Scraper/Pig Trap ☐ Sump/Separator ☐ Repair Sleeve or Clamp ☐ Hot Tap Equipment ☐ Stopple Fitting ☐ Flange ☐ Relief Line ☐ Auxiliary Piping (e.g. drain lines) ☐ Tubing ☐ Instrumentation ☐ Tank/Vessel ➡ Specify: ☐ Single Bottom System ☐ Double Bottom System ☐ Tank Shell ☐ Chime ☐ Roof/Roof Seal ☐ Roof Drain System ☐ Mixer ☐ Pressure Vessel Head or Wall ☐ Appurtenance ☐ Other _____ ☐ Other _____	
4. Year item involved in Accident was installed: <u> / / / / </u>	

5. Material involved in Accident: (select only one)**☐ Carbon Steel☐ Material other than Carbon Steel ➞ Specify: _____6. Type of Accident involved: (select only one)**☐ Mechanical Puncture ➞ Approx. size: / / / / / / / in. (axial) by / / / / / / / in. (circumferential)☐ Leak ➞ Select Type: ☐ Pinhole ☐ Crack ☐ Connection Failure ☐ Seal or Packing ☐ Other _____☐ Rupture ➞ Select Orientation: ☐ Circumferential ☐ Longitudinal ☐ Other _____

Approx. size: / / / / / / / in. (widest opening) by / / / / / / / in. (length circumferentially or axially)

☐ Overfill or Overflow☐ Other ➞ Describe: _____

[illegible]

PART E – ADDITIONAL OPERATING INFORMATION							
*1. Estimated pressure at the point and time of the Accident (psig): _____ *2. Maximum Operating Pressure (MOP) at the point and time of the Accident (psig) : _____ *3. Describe the pressure on the system or facility relating to the Accident: <i>(select only one)</i> ☐ Pressure did not exceed MOP ☐ Pressure exceeded MOP, but did not exceed 110% of MOP ☐ Pressure exceeded 110% of MOP *4. Not including pressure reductions required by PHMSA regulations (such as for repairs and pipe movement), was the system or facility relating to the Accident operating under an established pressure restriction with pressure limits below those normally allowed by the MOP? ☐ No ☐ Yes ➡ <i>(Complete 4.a and 4.b below)</i> *4.a Did the pressure exceed this established pressure restriction? ☐ Yes ☐ No *4.b Was this pressure restriction mandated by PHMSA or the State? ☐ PHMSA ☐ State ☐ Not mandated							
*5. Was "Onshore Pipeline, Including Valve Sites" OR "Offshore Pipeline, Including Riser and Riser Bend" selected in PART C, Question 2?							
☐ No ☐ Yes ➡ <i>(Complete 5.a – 5.f below)</i> 5.a Type of upstream valve used to initially isolate release source: ☐ Manual ☐ Automatic ☐ Remotely Controlled 5.b Type of downstream valve used to initially isolate release source: ☐ Manual ☐ Automatic ☐ Remotely Controlled ☐ Check Valve 5.c Length of segment initially isolated between valves (ft): _____ 5.d Is the pipeline configured to accommodate internal inspection tools? ☐ Yes ☐ No ➡ Which physical features limit tool accommodation? <i>(select all that apply)</i> ☐ Changes in line pipe diameter ☐ Presence of unsuitable mainline valves ☐ Tight or mitered pipe bends ☐ Other passage restrictions (i.e. unbarred tee's, projecting instrumentation, etc.) ☐ Extra thick pipe wall (applicable only for magnetic flux leakage internal inspection tools) ☐ Other ➡ Describe: _____ 5.e For this pipeline, are there operational factors which significantly complicate the execution of an internal inspection tool run? ☐ No ☐ Yes ➡ Which operational factors complicate execution? <i>(select all that apply)</i> ☐ Excessive debris or scale, wax, or other wall build-up ☐ Low operating pressure(s) ☐ Low flow or absence of flow ☐ Incompatible commodity ☐ Other ➡ Describe: _____ 5.f Function of pipeline system: <i>(select only one)</i> <table style="width: 100%; border: none;"> <tr> <td style="width: 50%; border: none;">☐ > 20% SMYS Regulated Trunkline/Transmission</td> <td style="width: 50%; border: none;">☐ > 20% SMYS Regulated Gathering</td> </tr> <tr> <td style="border: none;">☐ ≤ 20% SMYS Regulated Trunkline/Transmission</td> <td style="border: none;">☐ ≤ 20% SMYS Regulated Gathering</td> </tr> <tr> <td style="border: none;">☐ ≤ 20% SMYS "Unregulated" Trunkline/Transmission</td> <td style="border: none;">☐ ≤ 20% SMYS "Unregulated" Gathering</td> </tr> </table>		☐ > 20% SMYS Regulated Trunkline/Transmission	☐ > 20% SMYS Regulated Gathering	☐ ≤ 20% SMYS Regulated Trunkline/Transmission	☐ ≤ 20% SMYS Regulated Gathering	☐ ≤ 20% SMYS "Unregulated" Trunkline/Transmission	☐ ≤ 20% SMYS "Unregulated" Gathering
☐ > 20% SMYS Regulated Trunkline/Transmission	☐ > 20% SMYS Regulated Gathering						
☐ ≤ 20% SMYS Regulated Trunkline/Transmission	☐ ≤ 20% SMYS Regulated Gathering						
☐ ≤ 20% SMYS "Unregulated" Trunkline/Transmission	☐ ≤ 20% SMYS "Unregulated" Gathering						

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

☐ No

☐ Yes ➡

6.a Was it operating at the time of the Accident? ☐ Yes ☐ No

6.b Was it fully functional at the time of the Accident? ☐ Yes ☐ No

6.c Did SCADA-based information (such as alarm(s), alert(s), event(s), and/or volume calculations) assist with the detection of the Accident? ☐ Yes ☐ No

6.d Did SCADA-based information (such as alarm(s), alert(s), event(s), and/or volume calculations) assist with the confirmation of the Accident? ☐ Yes ☐ No

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

☐ No

☐ Yes ➡

7.a Was it operating at the time of the Accident? ☐ Yes ☐ No

7.b Was it fully functional at the time of the Accident? ☐ Yes ☐ No

7.c Did CPM leak detection system information (such as alarm(s), alert(s), event(s), and/or volume calculations) assist with the detection of the Accident? ☐ Yes ☐ No

7.d Did CPM leak detection system information (such as alarm(s), alert(s), event(s), and/or volume calculations) assist with the confirmation of the Accident? ☐ Yes ☐ No

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

☐ CPM leak detection system or SCADA-based information (such as alarm(s), alert(s), event(s), and/or volume calculations)

☐ Static Shut-in Test or Other Pressure or Leak Test

☐ Controller

☐ Air Patrol

☐ Notification from Public

☐ Notification from Third Party that caused the Accident

☐ Local Operating Personnel, including contractors

☐ Ground Patrol by Operator or its contractor

☐ Notification from Emergency Responder

☐ Other _____

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

☐ Operator employee

☐ Contractor working for the Operator

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

☐ Yes, but the investigation of the control room and/or controller actions has not yet been completed by the Operator (Supplemental Report required)

☐ No, the facility was not monitored by a controller(s) at the time of the Accident

☐ No, the Operator did not find that an investigation of the controller(s) actions or control room issues was necessary due to: (provide an explanation for why the Operator did not investigate)

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

☐ Investigation reviewed work schedule rotations, continuous hours of service (while working for the Operator) and other factors associated with fatigue

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

☐ Investigation identified no control room issues

☐ Investigation identified no controller issues

☐ Investigation identified incorrect controller action or controller error

☐ Investigation identified that fatigue may have affected the controller(s) involved or impacted the involved controller(s) response

☐ Investigation identified incorrect procedures

☐ Investigation identified incorrect control room equipment operation

☐ Investigation identified maintenance activities that affected control room operations, procedures, and/or controller response

☐ Investigation identified areas other than those above ➡ Describe: _____

PART F – DRUG & ALCOHOL TESTING INFORMATION

- *1. As a result of this Accident, were any Operator employees tested under the post-accident drug and alcohol testing requirements of DOT's Drug & Alcohol Testing regulations?
- ☐ No
- ☐ Yes ➡ *1.a Specify how many were tested: / / /
- *1.b Specify how many failed: / / /
- *2. As a result of this Accident, were any Operator contractor employees tested under the post-accident drug and alcohol testing requirements of DOT's Drug & Alcohol Testing regulations?
- ☐ No
- ☐ Yes ➡ *2.a Specify how many were tested: / / /
- *2.b Specify how many failed: / / /

PART G – APPARENT CAUSE	<i>Select only one box from PART G in the shaded column on the left representing the APPARENT Cause of the Accident, and answer the questions on the right. Describe secondary, contributing, or root causes of the Accident in the narrative (PART H).</i>
G1 - Corrosion Failure – *only one sub-cause can be picked from shaded left-hand column	
☐ External Corrosion	*1. Results of visual examination: ☐ Localized Pitting ☐ General Corrosion ☐ Other _____ *2. Type of corrosion: <i>(select all that apply)</i> ☐ Galvanic ☐ Atmospheric ☐ Stray Current ☐ Microbiological ☐ Selective Seam ☐ Other _____ *3. The type(s) of corrosion selected in Question 2 is based on the following: <i>(select all that apply)</i> ☐ Field examination ☐ Determined by metallurgical analysis ☐ Other _____ *4. Was the failed item buried under the ground? ☐ Yes ⇨ *4.a Was failed item considered to be under cathodic protection at the time of the Accident? ☐ Yes ⇨ Year protection started: <u> </u> / <u> </u> / <u> </u> / <u> </u> / <u> </u> ☐ No *4.b Was shielding, tenting, or disbonding of coating evident at the point of the Accident? ☐ Yes ☐ No *4.c Has one or more Cathodic Protection Survey been conducted at the point of the Accident? ☐ Yes, CP Annual Survey ⇨ Most recent year conducted: <u> </u> / <u> </u> / <u> </u> / <u> </u> / <u> </u> ☐ Yes, Close Interval Survey ⇨ Most recent year conducted: <u> </u> / <u> </u> / <u> </u> / <u> </u> / <u> </u> ☐ Yes, Other CP Survey ⇨ Most recent year conducted: <u> </u> / <u> </u> / <u> </u> / <u> </u> / <u> </u> ☐ No ☐ No ⇨ 4.d Was the failed item externally coated or painted? ☐ Yes ☐ No *5. Was there observable damage to the coating or paint in the vicinity of the corrosion? ☐ Yes ☐ No
☐ Internal Corrosion	*6. Results of visual examination: ☐ Localized Pitting ☐ General Corrosion ☐ Not cut open ☐ Other _____ *7. Cause of corrosion: <i>(select all that apply)</i> ☐ Corrosive Commodity ☐ Water drop-out/Acid ☐ Microbiological ☐ Erosion ☐ Other _____ *8. The cause(s) of corrosion selected in Question 7 is based on the following: <i>(select all that apply)</i> ☐ Field examination ☐ Determined by metallurgical analysis ☐ Other _____ *9. Location of corrosion: <i>(select all that apply)</i> ☐ Low point in pipe ☐ E bow ☐ Other _____ *10. Was the commodity treated with corrosion inhibitors or biocides? ☐ Yes ☐ No 11. Was the interior coated or lined with protective coating? ☐ Yes ☐ No 12. Were cleaning/dewatering pigs (or other operations) routinely utilized? ☐ Not applicable - Not mainline pipe ☐ Yes ☐ No 13. Were corrosion coupons routinely utilized? ☐ Not applicable - Not mainline pipe ☐ Yes ☐ No
Complete the following if any Corrosion Failure sub-cause is selected AND the "Item Involved in Accident" (from PART C, Question 3) is Tank/Vessel. 14. List the year of the most recent inspections: 14.a API Std 653 Out-of-Service Inspection <u> </u> / <u> </u> / <u> </u> / <u> </u> / <u> </u> 14.b API Std 653 In-Service Inspection <u> </u> / <u> </u> / <u> </u> / <u> </u> / <u> </u> ☐ No Out-of-Service Inspection completed ☐ No In-Service Inspection completed	

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

15. Has one or more internal inspection tool collected data at the point of the Accident?

☐ Yes ☐ No

15.a. If Yes, for each tool used, select type of internal inspection tool and indicate most recent year run:

- ☐ Magnetic Flux Leakage Tool / / / / /
- ☐ Ultrasonic / / / / /
- ☐ Geometry / / / / /
- ☐ Caliper / / / / /
- ☐ Crack / / / / /
- ☐ Hard Spot / / / / /
- ☐ Combination Tool / / / / /
- ☐ Transverse Field/Triaxial / / / / /
- ☐ Other _____ / / / / /

16. Has one or more hydrotest or other pressure test been conducted since original construction at the point of the Accident?

☐ Yes ➡ Most recent year tested: / / / / / Test pressure (psig): / / / / /

☐ No

17. Has one or more Direct Assessment been conducted on this segment?

☐ Yes, and an investigative dig was conducted at the point of the Accident ➡ Most recent year conducted: / / / / /

☐ Yes, but the point of the Accident was not identified as a dig site ➡ Most recent year conducted: / / / / /

☐ No

18. Has one or more non-destructive examination been conducted at the point of the Accident since January 1, 2002?

☐ Yes ☐ No

18.a. If Yes, for each examination conducted since January 1, 2002, select type of non-destructive examination and indicate most recent year the examination was conducted:

- ☐ Radiography / / / / /
- ☐ Guided Wave Ultrasonic / / / / /
- ☐ Handheld Ultrasonic Tool / / / / /
- ☐ Wet Magnetic Particle Test / / / / /
- ☐ Dry Magnetic Particle Test / / / / /
- ☐ Other _____ / / / / /

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

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

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

*6. Were the natural forces causing the Accident generated in conjunction with an extreme weather event? ☐ Yes ☐ No

*6.a. If Yes, specify: (select all that apply)

- ☐ Hurricane ☐ Tropical Storm ☐ Tornado
☐ Other _____

G3 – Excavation Damage - *only one **sub-cause** can be picked from shaded left-hand column
☐ Excavation Damage by Operator
(First Party)

☐ Excavation Damage by Operator's
Contractor (Second Party)

☐ Excavation Damage by Third Party

☐ Previous Damage due to Excavation
Activity

Complete Questions 1-5 ONLY IF the "Item Involved in Accident" (from PART C, Question 3) is Pipe or Weld.

1. Has one or more internal inspection tool collected data at the point of the Accident?
☐ Yes ☐ No

1.a If Yes, for each tool used, select type of internal inspection tool and indicate most recent year run:

☐ Magnetic Flux Leakage	/ / / / /
☐ Ultrasonic	/ / / / /
☐ Geometry	/ / / / /
☐ Caliper	/ / / / /
☐ Crack	/ / / / /
☐ Hard Spot	/ / / / /
☐ Combination Tool	/ / / / /
☐ Transverse Field/Triaxial	/ / / / /
☐ Other _____	/ / / / /

2. Do you have reason to believe that the internal inspection was completed BEFORE the damage was sustained? ☐ Yes ☐ No

3. Has one or more hydrotest or other pressure test been conducted since original construction at the point of the Accident?

☐ Yes ➔ Most recent year tested: / / / / /
Test pressure (psig): / / / , / / / /

☐ No

4. Has one or more Direct Assessment been conducted on the pipeline segment?

☐ Yes, and an investigative dig was conducted at the point of the Accident

➔ Most recent year conducted: / / / / /

☐ Yes, but the point of the Accident was not identified as a dig site

➔ Most recent year conducted: / / / / /

☐ No

5. Has one or more non-destructive examination been conducted at the point of the Accident since January 1, 2002?

☐ Yes ☐ No

5.a If Yes, for each examination conducted since January 1, 2002, select type of non-destructive examination and indicate most recent year the examination was conducted:

☐ Radiography	/ / / / /
☐ Guided Wave Ultrasonic	/ / / / /
☐ Handheld Ultrasonic Tool	/ / / / /
☐ Wet Magnetic Particle Test	/ / / / /
☐ Dry Magnetic Particle Test	/ / / / /
☐ Other _____	/ / / / /

Complete the following if Excavation Damage by Third Party is selected as the sub-cause.

6. Did the Operator get prior notification of the excavation activity? ☐ Yes ☐ No

*6.a If Yes, Notification received from: (select all that apply) ☐ One-Call System ☐ Excavator ☐ Contractor ☐ Landowner

Complete the following mandatory CGA-DIRT Program questions if any Excavation Damage sub-cause is selected.

7. Do you want PHMSA to upload the following information to CGA-DIRT (www.cga-dirt.com)? ☐ Yes ☐ No

*8. Right-of-Way where event occurred: (select all that apply)

- ☐ Public ➡ Specify: ☐ City Street ☐ State Highway ☐ County Road ☐ Interstate Highway ☐ Other
- ☐ Private ➡ Specify: ☐ Private Landowner ☐ Private Business ☐ Private Easement
- ☐ Pipeline Property/Easement
- ☐ Power/Transmission Line
- ☐ Railroad
- ☐ Dedicated Public Utility Easement
- ☐ Federal Land
- ☐ Data not collected
- ☐ Unknown/Other

*9. Type of excavator: (select only one)

- ☐ Contractor ☐ County ☐ Developer ☐ Farmer ☐ Municipality ☐ Occupant
- ☐ Railroad ☐ State ☐ Utility ☐ Data not collected ☐ Unknown/Other

*10. Type of excavation equipment: (select only one)

- ☐ Auger ☐ Backhoe/Trackhoe ☐ Boring ☐ Drilling ☐ Directional Drilling
- ☐ Explosives ☐ Farm Equipment ☐ Grader/Scraper ☐ Hand Tools ☐ Milling Equipment
- ☐ Probing Device ☐ Trencher ☐ Vacuum Equipment ☐ Data not collected ☐ Unknown/Other

*11. Type of work performed: (select only one)

- ☐ Agriculture ☐ Cable TV ☐ Curb/Sidewalk ☐ Building Construction ☐ Building Demolition
- ☐ Drainage ☐ Driveway ☐ Electric ☐ Engineering/Surveying ☐ Fencing
- ☐ Grading ☐ Irrigation ☐ Landscaping ☐ Liquid Pipeline ☐ Milling
- ☐ Natural Gas ☐ Pole ☐ Public Transit Authority ☐ Railroad Maintenance ☐ Road Work
- ☐ Sewer (Sanitary/Storm) ☐ Site Development ☐ Steam ☐ Storm Drain/Culvert ☐ Street Light
- ☐ Telecommunications ☐ Traffic Signal ☐ Traffic Sign ☐ Water ☐ Waterway Improvement
- ☐ Data not collected ☐ Unknown/Other

*12. Was the One-Call Center notified? ☐ Yes ☐ No

*12.a If Yes, specify ticket number: / / / / / / / / / / / / / / / / /

*12.b If this is a State where more than a single One-Call Center exists, list the name of the One-Call Center notified:

*13. Type of Locator: ☐ Utility Owner ☐ Contract Locator ☐ Data not collected ☐ Unknown/Other

*14. Were facility locate marks visible in the area of excavation? ☐ No ☐ Yes ☐ Data not collected ☐ Unknown/Other

*15. Were facilities marked correctly? ☐ No ☐ Yes ☐ Data not collected ☐ Unknown/Other

*16. Did the damage cause an interruption in service? ☐ No ☐ Yes ☐ Data not collected ☐ Unknown/Other

*16.a If Yes, specify duration of the interruption: / / / / / hours

(This CGA-DIRT section continued on next page with Question 17.)

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

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

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

☐ Locating Practices Not Sufficient: (select only one)

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

☐ Excavation Practices Not Sufficient: (select only one)

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

☐ One-Call Notification Center Error

☐ Abandoned Facility

☐ Deteriorated Facility

☐ Previous Damage

☐ Data Not Collected

☐ Other / None of the Above (explain) _____

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

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

☐ Malfunction of Control/Relief Equipment	1. Specify: <i>(select all that apply)</i> ☐ Control Valve ☐ Instrumentation ☐ SCADA ☐ Communications ☐ Block Valve ☐ Check Valve ☐ Relief Valve ☐ Power Failure ☐ Stopple/Control Fitting ☐ ESD System Failure ☐ Other _____
☐ Pump or Pump-related Equipment	2. Specify: ☐ Seal/Packing Failure ☐ Body Failure ☐ Crack in Body ☐ Appurtenance Failure ☐ Other _____
☐ Threaded Connection/Coupling Failure	3. Specify: ☐ Pipe Nipple ☐ Valve Threads ☐ Mechanical Coupling ☐ Threaded Pipe Collar ☐ Threaded Fitting ☐ Other _____
☐ Non-threaded Connection Failure	4. Specify: ☐ O-Ring ☐ Gasket ☐ Seal (NOT pump seal) or Packing ☐ Other _____
☐ Defective or Loose Tubing or Fitting	
☐ Failure of Equipment Body (except Pump), Tank Plate, or other Material	
☐ Other Equipment Failure	*5. Describe: _____ _____

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

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

G7 - Incorrect Operation - *only one **sub-cause** can be picked from shaded left-hand column

☐ Damage by Operator or Operator's Contractor NOT Related to Excavation and NOT due to Motorized Vehicle/Equipment Damage	
☐ Tank, Vessel, or Sump/Separator Allowed or Caused to Overflow or Overflow	1. Specify: ☐ Valve misalignment ☐ Incorrect reference data/calculation ☐ Miscommunication ☐ Inadequate monitoring ☐ Other _____
☐ Valve Left or Placed in Wrong Position, but NOT Resulting in a Tank, Vessel, or Sump/Separator Overflow or Facility Overpressure	
☐ Pipeline or Equipment Overpressured	
☐ Equipment Not Installed Properly	
☐ Wrong Equipment Specified or Installed	
☐ Other Incorrect Operation	*2. Describe: _____

Complete the following if any Incorrect Operation sub-cause is selected.*3. Was this Accident related to: *(select all that apply)*

- ☐ Inadequate procedure
☐ No procedure established
☐ Failure to follow procedure
☐ Other: _____

*4. What category type was the activity that caused the Accident:

- ☐ Construction
☐ Commissioning
☐ Decommissioning
☐ Right-of-Way activities
☐ Routine maintenance
☐ Other maintenance
☐ Normal operating conditions
☐ Non-routine operating conditions (abnormal operations or emergencies)

*5. Was the task(s) that led to the Accident identified as a covered task in your Operator Qualification Program? ☐ Yes ☐ No

*5.a If Yes, were the individuals performing the task(s) qualified for the task(s)?

- ☐ Yes, they were qualified for the task(s)
☐ No, but they were performing the task(s) under the direction and observation of a qualified individual
☐ No, they were not qualified for the task(s) nor were they performing the task(s) under the direction and observation of a qualified individual

G8 – Other Accident Cause - *only one **sub-cause** can be picked from shaded left-hand column

☐ Miscellaneous	*1. Describe: _____ _____
☐ Unknown	*2. Specify: ☐ Investigation complete, cause of Accident unknown ☐ Still under investigation, cause of Accident to be determined* (*Supplemental Report required)

This image shows a single sheet of white paper with horizontal ruling lines. The lines are evenly spaced and run across the width of the page. There are no margins, text, or other markings on the paper.

Authorized Signature's E-mail Address

Pennsylvania

Oil				
When to Report	Notification Numbers	What to Report	Written Follow-Up Reports	Citation
Immediately Report any petroleum discharges of 5 gallons or more into waters of the commonwealth or onto lands from which it might flow or drain into waters of the commonwealth (waters of the commonwealth include surface and underground water) ***If possible, provide notification Within 2 Hours to known downstream water users who could be potentially affected. If this cannot be completed, request that the County Emergency Management Agency complete this task***	Pennsylvania Department of Environmental Protection - Regional Office: **See appendix for Regional Assignments, and Contact Info** ***In the event that no contact with the regional office is made, the answering service in Harrisburg [(717) 787-5027; (800) 541-2050 Statewide] will receive calls 24 hours daily, including weekends and holidays	In the verbal notice, provide the following information: 1)The regulated substance involved; 2)The quantity of regulated substance involved; 3)When and where the release occurred; 4)The affected environmental media; 5)Relevant, available information concerning impacts to water supplies, buildings, or to sewer or other utility lines; 6)Interim remedial actions planned, initiated or completed	Within 15 days after the incident, a written report must be submitted to: 1) The Operations Chief of the Water Quality Management Program at the appropriate regional office; 2)Each municipality in which the reportable release occurred; 3) Each municipality where the release has impacted environmental media or water supplies, buildings, or sewer or other utility lines. Address the items from the telephone notification in the written report. See Appendix for Mailing Addresses	Pennsylvania Code: 25 PA§91.33, 25 PA§245.305

Pennsylvania

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

When to Report	Notification Numbers	What to Report	Written Follow-Up Reports	Mailing Address for Follow-Up Reports	Citation
A reportable release is a quantity (or unknown quantity) of a regulated substance released to or posing an immediate threat to surface water, groundwater, bedrock, soil, or sediment. The following 2 scenarios are exceptions to a reportable release: #1 >25 gallons of petroleum to an aboveground surface: If the owner or operator has control over the release, the release is contained, and within 24 hours the total volume of the release is recovered or removed. #2 A release to the interstitial space of a double-walled AST or UST: If the owner or operator has control over the release, the release is contained, and within 24 hours the total volume of the release is recovered or removed. Report Immediately but Within 2 Hours any reportable tank release as defined above ***If possible, provide notification Within 2 Hours to known downstream water users who could be potentially affected. If this cannot be completed, request that the County Emergency Management Agency complete this task.***	Local Fire Authority (if fire, explosion, or safety hazards exist at the site) Pennsylvania Department of Environmental Protection - Regional Office: **See appendix for Regional Assignments, and Contact Info** ***In the event that no contact with the regional office is made, the answering service in Harrisburg [(717) 787-5027; (800) 541-2050 Statewide] will receive calls 24 hours daily, including weekends and holidays	In the verbal notice, provide the following information: 1) The regulated substance involved; 2) The quantity of the regulated substance involved; 3) When and where the release occurred; 4) The extent of contamination of surface water, groundwater, soil, or sediment 5) Interim remedial actions planned, initiated, or completed	Within 15 days after the incident, a written report must be submitted to: 1) The Operations Chief of the Water Quality Management Program at the appropriate regional office; 2) Each municipality in which the reportable release occurred; 3) Each municipality where the release has impacted environmental media or water supplies, buildings, or sewer or other utility lines. Address the items from the telephone notification in the written report.	See appendix for PADEP Regional Assignments, and Contact Info Pennsylvania Emergency Management Agency (PEMA) 2605 Interstate Drive Harrisburg, PA 17110-9354	Pennsylvania Code: 25 PA§245.305
Immediately Report Any Reportable Releases from Storage Tank Facilities Storing >21,000 Gallons of Regulated Substances	In addition to contacting the local fire authority and appropriate regional office listed above, also contact: County Emergency Management Agency -Pennsylvania Emergency Management Agency (PEMA) (717) 651-2001				

Pennsylvania

Facility-Specific Requirements - Icedale Pump Station & Storage Facility

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

Facility-Specific Requirements - Malvern Terminal

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

Pennsylvania

Facility-Specific Requirements - Marcus Hook #2 Tank Farm

When to Report	Notification Numbers	What to Report	Written Follow-Up Reports	Mailing Address for Follow-Up Reports	Citation
<u>Immediately Report</u> any release of <u>gasoline</u> that is not under control, not completely contained, and not completely recovered or removed, <u>within 2 hours after the confirmation of a reportable release.</u> A release is defined as, but not limited to: (1) More than twenty-five (25) gallons to a contaminated area, structure or facility around an above ground storage tank, or (2) More than five (5) gallons to a synthetic surface, such as asphalt or concrete. (3) A release of more than one (1) gallon to surface soils.	Pennsylvania Department of Environmental Protection - Regional Office: Region I (Southeast PA): (484) 250-5900	The report shall describe, to the extent information is available: (1) the quantity of substance involved, (2) date and time the release occurred, (3) interim remedial action planned, initiated, and/or completed.	A written report may be REQUESTED or REQUIRED by the PADEP. Call the notification numbers to inquire if a written follow-up report is required and if so, the content of the report and mailing address.	PADEP Southeast Regional Office Regional Air Program Manager 2 East Main Street Norristown, PA 19401	MHTF Title V Permit #23-00044 Section C, Requirement #010 MHTF Title V Permit #23-00044 Section C, Requirement #014

Facility-Specific Requirements - Twin Oaks Terminal

When to Report	Notification Numbers	What to Report	Written Follow-Up Reports	Mailing Address for Follow-Up Reports	Citation
<u>Immediately Report</u> any release of <u>gasoline</u> that is not under control, not completely contained, and not completely recovered or removed, <u>within 2 hours after the confirmation of a reportable release.</u> A release is defined as, but not limited to: a) More than twenty-five (25) gallons to a contaminated area, structure or facility around an above ground storage tank, or b) More than five (5) gallons to a synthetic surface, such as asphalt or concrete.	Pennsylvania Department of Environmental Protection - Regional Office: Region I (Southeast PA): (484) 250-5900	The report shall describe, to the extent information is available: (1) the quantity of substance involved, (2) date and time the release occurred, (3) interim remedial action planned, initiated, and/or completed.	A written report may be REQUESTED or REQUIRED by the PADEP. Call the notification numbers to inquire if a written follow-up report is required and if so, the content of the report and mailing address.	PADEP Southeast Regional Office Regional Air Program Manager 2 East Main Street Norristown, PA 19401	Twin Oaks TVOP 23-00045 Section C IV, Recordkeeping Requirements (condition #013) (PA code 127.441) Section C V, Reporting Requirements (condition # 018) (25 PA code 127.441)

Pennsylvania

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

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION2550-FM-BWM0082 12/2005
BUREAU OF WASTE MANAGEMENT

NOTIFICATION OF REPORTABLE RELEASE (Owners and Operators)

☐ Initial
☐ Follow-Up

NOTIFICATION OF CONTAMINATION (Certified Installers and Inspectors)

NOTIFICATION OF REPORTABLE RELEASE (Owners and Operators)

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

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

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

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

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

OWNERS AND OPERATORS (O/O)

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

NOTIFICATION OF CONTAMINATION
(Certified Installers and Inspectors)

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

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

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

CERTIFIED INSTALLERS AND INSPECTORS (I/I)

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

INSTRUCTIONS

- I. **FACILITY INFORMATION** - Record the name, I.D. number and physical location (not P.O. Box) of the facility at which a reportable release has been confirmed or at which suspected or confirmed contamination has been observed. Include the name and phone number of a person to contact at the facility.
- II. **OWNER/OPERATOR INFORMATION** - Record the name, business address and phone number of the owner of the facility identified in Section I. Also, record the name and phone number of the operator of the facility.
- III. **REGULATED SUBSTANCE INFORMATION** - Indicate to the best of your knowledge: A) the type of product or products involved; B) the quantity of product or products released; and C) whether the contamination is suspected or confirmed.
- IV. **REPORTABLE RELEASE INFORMATION** - Record the date of confirmation of the reportable release, e.g., "9/18/01"; the date and regional office notified; and the date the local municipality(ies) [provide name of municipality(ies)] was/were sent a copy of this form. Indicate to the best of your knowledge the source/cause of the release, how the release was discovered and the environmental media affected and impacts.
- V. **INTERIM REMEDIAL ACTIONS** - Indicate the interim remedial actions planned, initiated or completed.
- VI. **SUSPECTED/CONFIRMED CONTAMINATION INFORMATION** - Record the date of observation of the suspected or confirmed contamination, e.g., "11/24/01". Indicate to the best of your knowledge the indications of a suspected release or extent of confirmed contamination resulting from the release of the regulated substance.
- VII. **ADDITIONAL INFORMATION** - Provide any additional, relevant, available information concerning the reportable release or suspected or confirmed contamination. Include in this section specific details or problems about the release. For example, if the piping was the source of the release and the cause was corrosion of a metal connector or flexible connector, it is important to include that information here. Use additional 8 1/2" x 11" sheets of paper, if necessary.
- VIII. **CERTIFICATION** - Please print your name, and provide your signature and date of signature. If a certified installer/inspector, provide certification number and company certification number.
- IX. **ATTACHMENT** - If a certified installer/inspector, provide a copy of failed valid tightness test(s), if applicable.

PLEASE SEND COMPLETED ORIGINAL FORM TO:

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

Southeast Region
2 East Main Street
Norristown, PA 19401
PHONE: 484-250-5900
FAX: 484-250-5943

Counties
Bucks, Chester, Delaware,
Montgomery, Philadelphia

Northeast Region
2 Public Square
Wilkes-Barre, PA 18711-0790
PHONE: 570-826-2511
FAX: 570-820-4907

Counties
Carbon, Lehigh, Luzerne, Monroe, Northampton,
Pike, Schuylkill, Susquehanna,
Wayne, Wyoming

Southcentral Region
909 Elmorton Avenue
Harrisburg, PA 17110
PHONE: 877-333-1904
FAX: 717-705-4830

Counties
Adams, Bedford, Berks, Blair, Cum-
berland, Dauphin, Franklin, Fulton,
Huntingdon, Juniata, Lancaster,
Lebanon, Mifflin, Perry, York

Northcentral Region
208 W Third Street, Suite 101
Williamsport, PA 17701
PHONE: 570-321-6525/327-3698
FAX: 570-327-3420

Counties
Bradford, Cameron, Centre,
Clinton, Clearford, Columbia,
Lycoming, Montour,
Northumberland, Potter, Snyder,
Sullivan, Tioga, Union

Southwest Region
400 Waterfront Drive
Pittsburgh, PA 15222
PHONE: 412-442-4091/4000
FAX: 412-442-4338

Counties
Allegheny, Armstrong,
Beaver, Cambria, Fayette,
Greene, Indiana, Somerset,
Washington, Westmoreland

Northwest Region
230 Chestnut Street
Meadville, PA 16335-3481
PHONE: 814-332-8945
800-373-3388
FAX: 814-332-6121

Counties
Butler, Clarion, Crawford, Elk,
Erie, Forest, Jefferson,
Lawrence, McKean, Mercer,
Venango, Warren

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FACILITY I.D. NUMBER

I. FACILITY INFORMATION (Both O/O and I/I)		II. OWNER/OPERATOR INFORMATION (Both O/O and I/I)	
Facility Name _____ Facility I.D. Number _____ Street Address (P.O. Box not acceptable) _____ City _____ State _____ Zip Code _____ County _____ Municipality _____ Contact Person _____ Phone Number _____		Owner Name _____ Address _____ City _____ State _____ Zip Code _____ Phone Number _____ Operator Name _____ Phone Number _____	
III. REGULATED SUBSTANCE INFORMATION			
A. Type of Product(s) Involved (Mark All That Apply ☐): Both O/O and I/I	B. Quantity (Gallons) of Product(s) Released: O/O Only	C. Contamination Suspected [S] or Confirmed [C] (Mark All That Apply ☐): I/I Only	
Leaded Gasoline ☐ Unleaded Gasoline ☐ Aviation Gasoline ☐ Kerosene ☐ Jet Fuel ☐ Diesel Fuel ☐ New Motor Oil ☐ Used Motor Oil ☐ Fuel Oil No. 1 ☐ Fuel Oil No. 2 ☐ Fuel Oil No. 4 ☐ Fuel Oil No. 5 ☐ Fuel Oil No. 6 ☐ Other (Specify) ☐ Unknown ☐	_____ _____ _____ _____ _____ _____ _____ _____ _____ _____ _____ _____ _____	_____[S] _____[C] _____[S] _____[C] _____[S] _____[C] _____[S] _____[C] _____[S] _____[C] _____[S] _____[C] _____[S] _____[C] _____[S] _____[C] _____[S] _____[C] _____[S] _____[C] _____[S] _____[C] _____[S] _____[C]	
IV. REPORTABLE RELEASE INFORMATION (O/O Only)			
Date Reportable Release was Confirmed: ____/____/____ Date Owner/Operator Verbally Notified Appropriate Regional Office of Reportable Release and Office Notified: Date: ____/____/____ Office _____		Date Owner/Operator Sent Copy of this Written Notification to Local Municipality(ies) and Name of Municipality(ies) Notified: Date: ____/____/____ Municipality _____ Date: ____/____/____ Municipality _____	
Source/Cause (Mark All That Apply ☐):	How Discovered (Mark All That Apply ☐):	Environmental Media Affected and Impacts (Mark All That Apply ☐):	
Tank (DEP Assigned Nos. _____) ☐ Piping System (Aboveground Regulated) ☐ Piping System (Underground Regulated) ☐ Piping System (Non-Regulated) ☐ Dispenser/Dispensing Equipment ☐ Spill Catchment Basin ☐ Accident/Act of God ☐ Containment/Sump Failure ☐ Faulty Installation ☐ Corrosion ☐ Mechanical Failure ☐ Spill During Delivery ☐ Overfill at Delivery ☐ Vehicle Gas Tank Overfill ☐ Product Delivery Hose Rupture ☐ Other (Specify) ☐ Unknown ☐	During Closure ☐ Lining Installation ☐ Routine Leak Detection ☐ Third Party Inspection ☐ Tightness Testing Activities ☐ Visible Product or Odor Reports ☐ Water in Tank ☐ Construction ☐ Upgrade/Repair ☐ Supply Well Sample Results ☐ Monitoring Well Sample Results ☐ Property Transfer ☐ Other (Specify) ☐ Unknown ☐	Soil ☐ Sediment ☐ Surface Water ☐ Ground Water ☐ Bedrock ☐ Water Supplies ☐ Vapors/Product in Buildings ☐ Vapors/Product in Sewer/Utility Lines ☐ Ecological Receptors ☐	

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FACILITY I.D. NUMBER

V. INTERIM REMEDIAL ACTIONS (O/O Only)(Mark All That Apply ☒):

	Planned	Initiated	Completed	Not Applicable
Regulated Substance Removed from Storage Tanks	☐	☐	☐	☐
Fire, Explosion and Safety Hazards Mitigated	☐	☐	☐	☐
Contaminated Soil Excavated	☐	☐	☐	☐
Free Product Recovered	☐	☐	☐	☐
Water Supplies Identified and Sampled	☐	☐	☐	☐
Temporary Water Supplies Provided	☐	☐	☐	☐
Other (Specify)	☐	☐	☐	☐

VI. SUSPECTED / CONFIRMED CONTAMINATION INFORMATION (I/I Only)Date of Observation of Suspected/Confirmed Contamination: ____ / ____ / ____
m d yIndication of Suspected Contamination (Mark All That Apply ☒):

- Unusual Level of Vapors ☐
- Erratic Behavior of Product Dispensing Equipment ☐
- Release Detection Results Indicate a Release ☐
- Discovery of Holes in the Storage Tank ☐
- Other (Specify) ☐

Extent of Confirmed Contamination (Mark All That Apply ☒):

- Product Stained or Product Saturated Soil or Backfill ☐
- Ponded Product ☐
- Free Product or Sheen on Ponded Water ☐
- Free Product or Sheen on the Ground Water Surface ☐
- Free Product or Sheen on Surface Water ☐
- Other (Specify) ☐

VII. ADDITIONAL INFORMATION (Both O/O and I/I)

Provide any additional, relevant, available information concerning the reportable release or suspected or confirmed contamination. Include specific details or problems about the release. For example, if the piping was the source of the release and the cause was corrosion of a metal connector or flexible connector, it is important to include that information here. Provide DEP assigned and owner/operator assigned tank number(s), where applicable. Use additional 8½" x 11" sheets of paper, if necessary.

2550-FM-BWM0082 10/2005

FACILITY I.D. NUMBER _____

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

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

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

Signature of Owner or Operator_____
Date

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

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

Signature of Certified Installer_____
Date_____
Installer Certification Number_____
Company Certification Number

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

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

Signature of Certified Inspector_____
Date_____
Inspector Certification Number_____
Company Certification Number

PENNSYLVANIA DEPARTMENT OF ENVIRONMENTAL PROTECTION REGIONAL OFFICES

Region VI Northwest

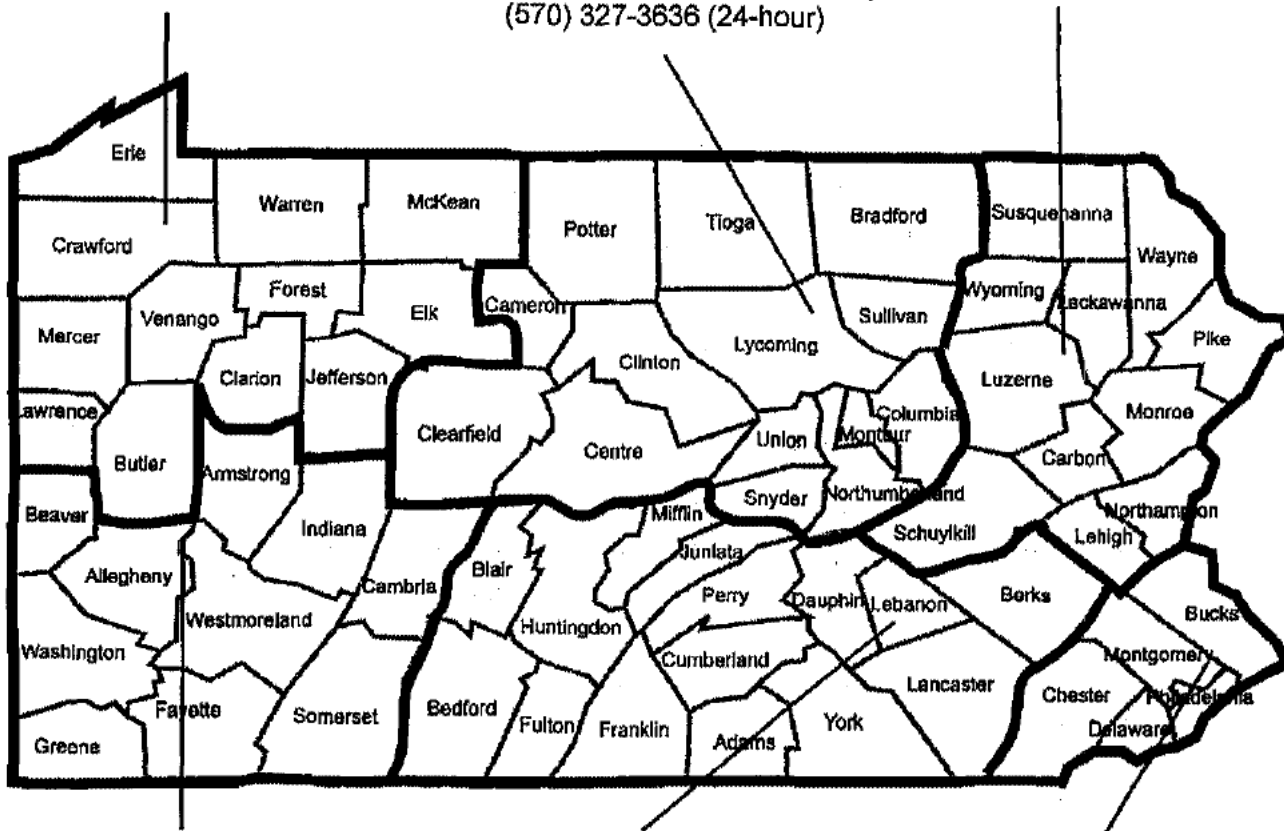
230 Chestnut Street
Meadville, PA 16335-3481
(814) 332-6945
(800) 373-3398 (After Hours)

Region IV Northcentral

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

Region II Northeast

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



Region V Southwest

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

Region III Southcentral

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

Region I Southeast

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

Notes:

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

Appendix C



February 3, 2012

Dear OSRO Customer:

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

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

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

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

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

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

Sincerely,

A handwritten signature in cursive script, reading "Patrick J. McGovern". The signature is fluid and extends to the right with a long horizontal stroke.

Patrick McGovern Operations Manager

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

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

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

COTP/ACC Name: BALTIMORE
Operating Area: River Canal

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

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

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

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

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

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

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

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

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

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

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

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

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

COTP/ACC Name: PHILADELPHIA
Operating Area: River Canal

Facility**Vessel****Classification Level: MMPD**

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

Classification Level: WCD1

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

Classification Level: WCD2

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

Classification Level: WCD3

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

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

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

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

COTP/ACC Name: BALTIMORE
Operating Area: Inland

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

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

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

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

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

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

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

COTP/ACC Name: NEW YORK
Operating Area: Inland

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

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

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

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

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

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

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

COTP/ACC Name: PHILADELPHIA
Operating Area: Inland

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

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

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

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

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

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

Elizabeth NJ –CVI Operations Branch, Corporate Office

Field Personnel - 70 .

Vacuum Trucks (3000gl.-5500gl) – 10 and 7 Vactors – 8 Combo/Jet Vacs .

Oil Containment Boom – 4000' (20" AMI) .

Work/Boom Deployment Boats (18'-30') – 6 (all towable)

(< 18") - 3

Elizabeth NJ– CCI Temporary Storage Disposal Fac.,

Field Personnel –21

Emergency Tank Capacity- 82,500 gallon

Elizabeth NJ– Transportation Branch,

Field Personnel – 9

Emergency Tank Capacity- (Vacuum Boxes 20 Roll-offs 60)

Vacuum Trucks (5000gl.-5500gl)-3

Roll-off Movers 7

Clayton NJ – Operations Branch

Field Personnel - 35 .

Vacuum Trucks (3000gl.-5500gl) – 5 and 3-Vactor .

Vacuum type skimmer heads – 4 .

DESMI TERMINATOR Skimmer 502 GPM – 2 .

Oil Containment Boom – 5000'(20" AMI) and (600'x 43" "CAROLINA" Ocean Boom) 1000-Swamp Boom (12" AMI) .

Work/Boom Deployment Boats (18'-26') – 8 (all towable)

(< 18") – 4

Baltimore MD – Operations Branch

Field Personnel - 35 .

Vacuum Trucks (3000gl.-5500gl) – 7 and 3 Vactors .

Oil Containment Boom – 2500'(20" AMI) .

Work/Boom Deployment Boats (18'-30') – 1

(< 18") - 3

Salisbury MD– Clean Venture (TPH) Operations Branch

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

Lewisberry PA – Operations / TSDF, / Transportation Branch

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

MA – General Chemical TSDF, Operations Branch

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

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

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



Date: March 2, 2011

OSRO Customer

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

Dear: Sir

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

I hope you find our submittal satisfactory.

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

Thank you.

Sincerely,

Patrick S. McGovern

*Patrick S. McGovern
Operations Manager*

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

COMPLIANCE YEAR 2011

Name of Oil Spill Removal Organization (OSRO):

Clean Venture, Inc.

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

(1) *Equipment deployed was:*

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

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

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

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

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

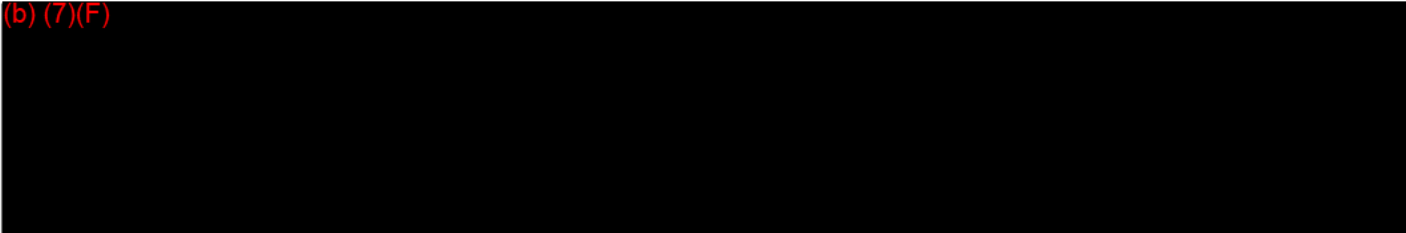
RESPONSE

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

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

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

(b) (7)(F)



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

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



Certifying Signature
Patrick S. McGovern
Operations Manager

March 2, 2011
Date



Date: July 7, 2011

OSRO Customer

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

Dear: Sir

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

I hope you find our submittal satisfactory.

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

Thank you.

Sincerely,

Patrick S. McGovern

*Patrick S. McGovern
Operations Manager*

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

COMPLIANCE YEAR 2011

Name of Oil Spill Removal Organization (OSRO):

Clean Venture, Inc.

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

(1) *Equipment deployed was:*

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

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

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

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

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

AND VACUUM TRUCK WITH SKIMMER. MONITORED FOR HAZARDOUS ATMOSPHERE.

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

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

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

(b) (7)(F)

BEING CONDUCTED IN THE VICINITY OF THE FACILITY.

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

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



 Certifying Signature
 Patrick S. McGovern
 Operations Manager

July 7, 2011
 Date

Appendix D

APPENDIX D

EMERGENCY MANAGEMENT TEAM JOB DESCRIPTIONS AND GUIDELINES

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

- Incident Commander
- Public Information Officer
- Liaison Officer
- Safety Officer
- Operations Section Chief
- Staging Group Leader
- Repair Group Leader
- Containment Group Leader
- Planning Section Chief
- Environmental Group Leader
- Situation Group Leader
- Logistics Section Chief
- Communications Group Leader
- Security/Medical Group Leader
- Supply/Ground Support Group Leader
- Finance Section Chief
- Accounting Group Leader
- Claims Group Leader
- Legal Group Leader
- Business Resumption Section Chief
- Repair Coordinator

INCIDENT COMMANDER

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

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

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

Responsibilities:

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

PUBLIC INFORMATION OFFICER

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

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

Responsibilities:

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

LIAISON OFFICER

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

Responsibilities:

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

SAFETY OFFICER

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

Responsibilities:

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

OPERATIONS SECTION CHIEF

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

Responsibilities:

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

STAGING GROUP LEADER

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

Responsibilities:

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

REPAIR GROUP LEADER

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

Responsibilities:

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

CONTAINMENT GROUP LEADER

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

Responsibilities:

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

PLANNING SECTION CHIEF

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

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

Responsibilities:

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

ENVIRONMENTAL GROUP LEADER

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

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

Responsibilities:

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

SITUATION GROUP LEADER

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

Responsibilities:

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

LOGISTICS SECTION CHIEF

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

Responsibilities:

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

COMMUNICATIONS GROUP LEADER

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

Responsibilities:

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

SECURITY/MEDICAL GROUP LEADER

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

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

Responsibilities:

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

SUPPLY/GROUND SUPPORT GROUP LEADER

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

Responsibilities:

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

FINANCE SECTION CHIEF

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

Responsibilities:

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

ACCOUNTING GROUP LEADER

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

Responsibilities:

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

CLAIMS GROUP LEADER

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

Responsibilities:

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

LEGAL GROUP LEADER

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

Responsibilities:

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

BUSINESS RESUMPTION SECTION CHIEF

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

Responsibilities:

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

REPAIR COORDINATOR

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

Responsibilities:

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

Appendix E

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