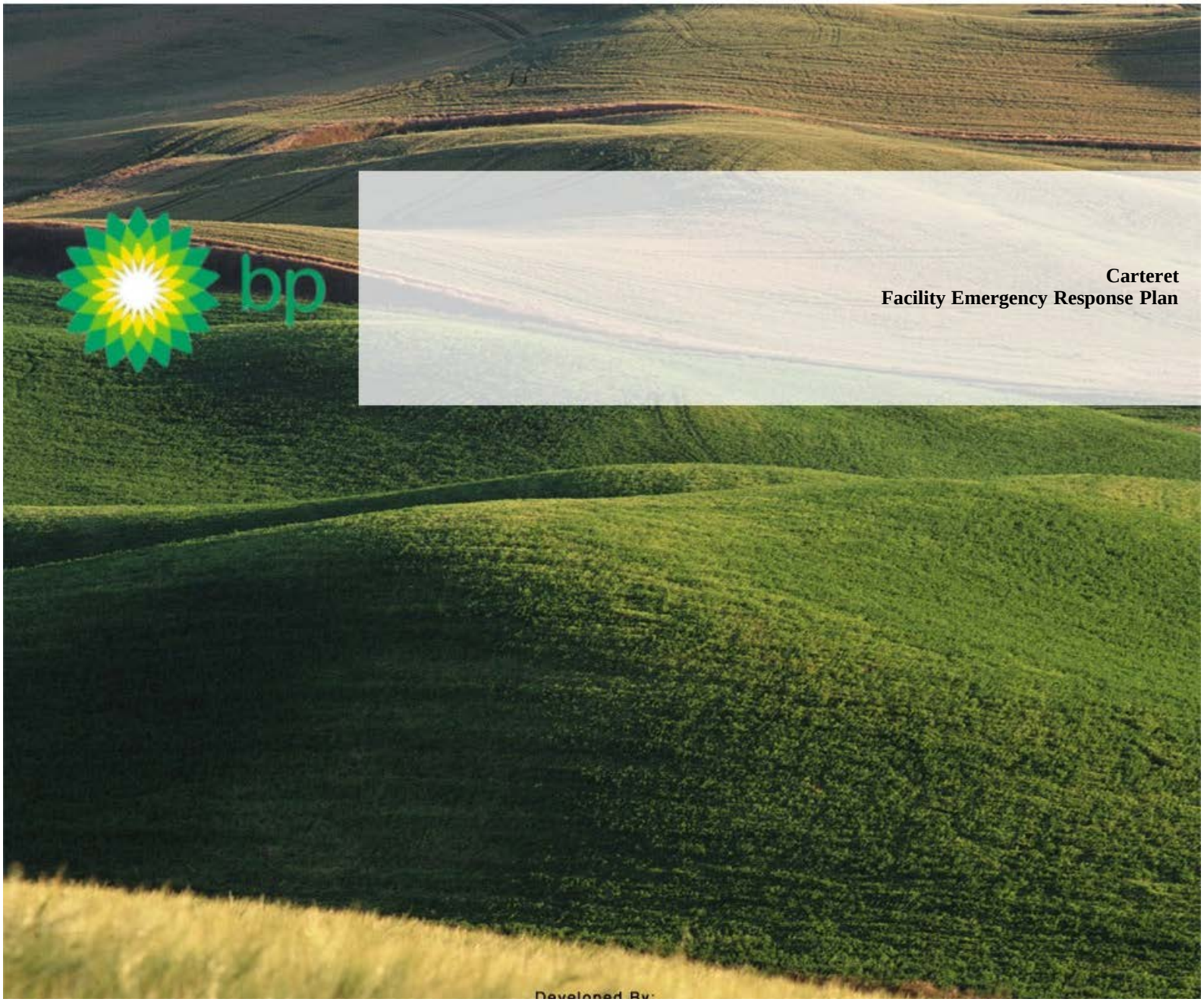
U.S. Department
of Transportation
**Pipeline and Hazardous
Materials Safety Administration**

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

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


bp
Carteret
Facility Emergency Response Plan
Developed by:


bp
Carteret
Facility Emergency Response Plan


bp
Carteret
Facility Emergency Response Plan
Developed By:

1610 Woodstead Court #355 • The Woodlands, Texas 77380 USA • Tel: 281-955-9600 • Fax: 281-955-0369 • info@trpcorp.com • www.emergency-response-planning.com

Carteret

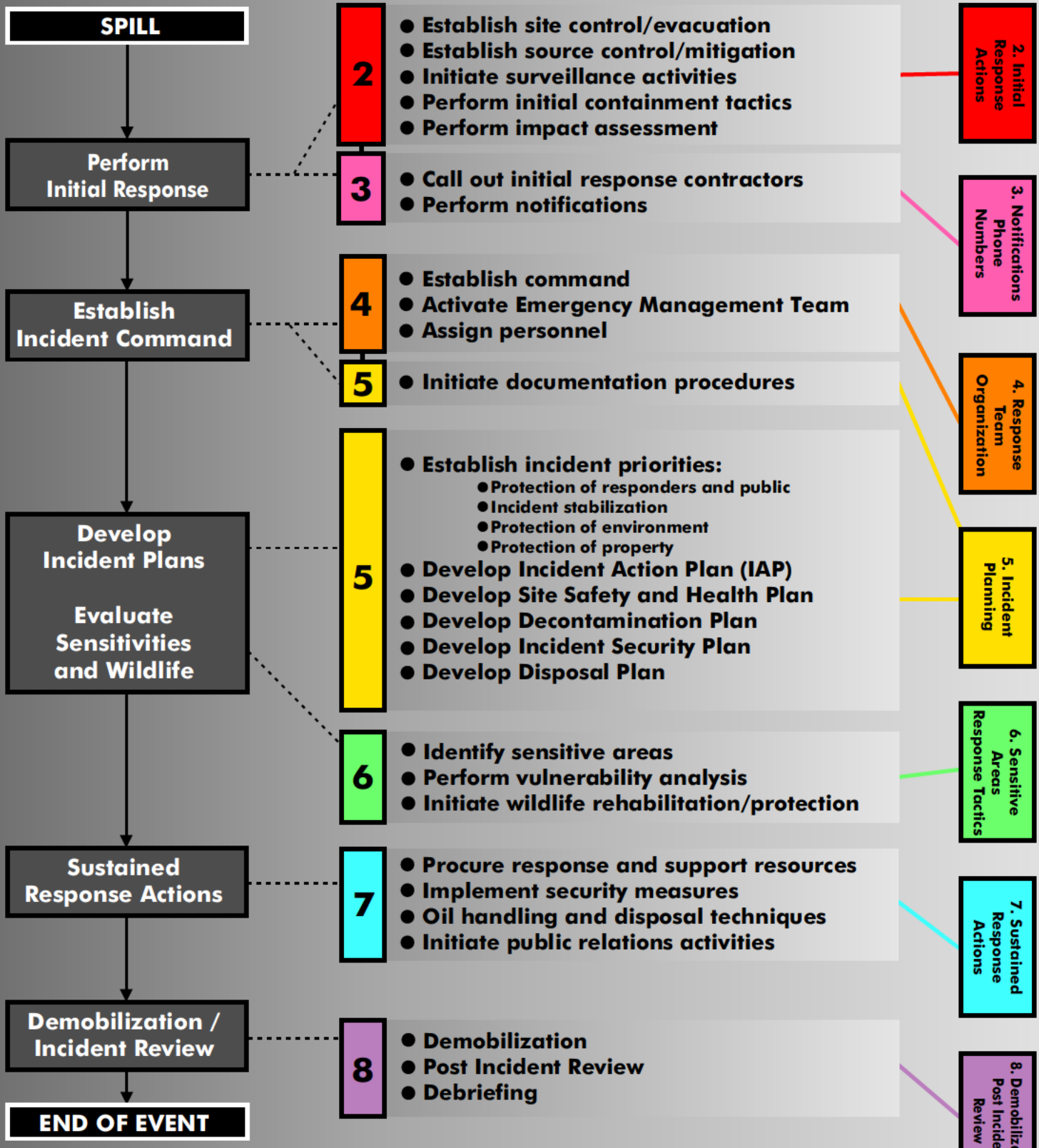
Emergency Response Action Plan

760 Roosevelt Avenue
Carteret, NJ 07008

Developed by:

1610 Woodstead Court, #355 · The Woodlands, Texas 77380 USA · Tel: 281-955-9600 · Fax : 281-955-0369 · info@trpcorp.com · www.emergency-response-planning.com

Response Procedures Flow Chart



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RECORD OF REVIEWS

The Record of Reviews is to document annual review of this Facility Response Plan; National Oil and Hazardous Substances Pollution Contingency Plan and applicable Area Contingency Plans.

DATE	NAME AND TITLE OF REVIEWER	SIGNATURE OR INITIALS OF REVIEWER	FRP REVISION REQUIRED (Yes / No)
10/23/2012	Jack Cowart Terminal Manager		Yes

RECORD OF CHANGES

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DATE OF CHANGE	DESCRIPTION OF CHANGE	PAGE NUMBER
9/28/2010	10 - EPA USCG PHMSA FRP | 1 - Introduction | Figure 1-2 - Information Summary | Line Sections	
9/28/2010	10 - EPA USCG PHMSA FRP | 1 - Introduction | Figure 1-2 - Information Summary | Information Summary	
9/28/2010	10 - EPA USCG PHMSA FRP | D - Hazard Evaluation and Risk Analysis | D.7 Spill Volume Calculations | D.7.3 DOT / PHMSA Portion of Pipeline / Facility	
9/28/2010	10 - EPA USCG PHMSA FRP | 1 - Introduction | 1.3 Certification of Adequate Resources	
9/28/2010	10 - EPA USCG PHMSA FRP | 1 - Introduction | Figure 1-6 - Pipeline Overview	
9/29/2010	10 - EPA USCG PHMSA FRP | 1 - Introduction | Figure 1-2 - Information Summary | Information Summary	
10/1/2010	10 - EPA USCG PHMSA FRP | 1 - Introduction | 1.4 Agency Submittal / Approval Letters	
11/9/2010	10 - EPA USCG PHMSA FRP | 1 - Introduction | 1.4 Agency Submittal / Approval Letters	
11/12/2010	10 - EPA USCG PHMSA FRP | 1 - Introduction | Figure 1-5 - Facility Site Plan	
3/31/2011	10 - EPA USCG PHMSA FRP | 1 - Introduction | Figure 1-2 - Information Summary | Information Summary	
5/19/2011	10 - EPA USCG PHMSA FRP | 2 - Initial Response Actions | 2.7 Fire Pre Plans	
10/4/2011	10 - EPA USCG PHMSA FRP | 6 - Sensitive Areas / Response Tactics | 6.7 Vulnerability Analysis	
10/4/2011	10 - EPA USCG PHMSA FRP | 3 - Notifications / Telephone Numbers | 3.1 Emergency Information and Notification Procedures | Figure 3.1-3 - Internal Notifications and Telephone Numbers | Emergency Response Contractors	

RECORD OF CHANGES**, CONTINUED**

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DATE OF CHANGE	DESCRIPTION OF CHANGE	PAGE NUMBER
10/4/2011	10 - EPA USCG PHMSA FRP | 3 - Notifications / Telephone Numbers | 3.1 Emergency Information and Notification Procedures | Figure 3.1-4 - External Notifications and Telephone Numbers | USCG Classified OSRO's / Non-Classified OSRO's	
10/4/2011	10 - EPA USCG PHMSA FRP | 7 - Sustained Response Actions | 7.1 Response Resources | Figure 7.1-1 - Regional Company and Response Contractor's Equipment List / Response Time	
10/4/2011	10 - EPA USCG PHMSA FRP | B - Contractor Response Equipment | B.1 Cooperatives and Contractors | B.1.1 OSRO Classification	
10/4/2011	10 - EPA USCG PHMSA FRP | B - Contractor Response Equipment | B.1 Cooperatives and Contractors | Figure B.1-1 - Evidence of Contracts	
10/4/2011	10 - EPA USCG PHMSA FRP | C - Tank Tables, Company Forms, Plot Plans | Figure C-1 - Tank Tables	
10/4/2011	10 - EPA USCG PHMSA FRP | C - Tank Tables, Company Forms, Plot Plans | Figure C-1 - Tank Tables	
10/4/2011	10 - EPA USCG PHMSA FRP | D - Hazard Evaluation and Risk Analysis | D.9 Product Characteristics and Hazards | D.9.1 Summary of Commodity Characteristics	
10/4/2011	10 - EPA USCG PHMSA FRP | D - Hazard Evaluation and Risk Analysis | D.7 Spill Volume Calculations | D.7.2 EPA Portion of the Facility (non-transportation related)	
10/4/2011	10 - EPA USCG PHMSA FRP | D - Hazard Evaluation and Risk Analysis | D.7 Spill Volume Calculations | D.7 EPA Planning Volume Data	
10/4/2011	10 - EPA USCG PHMSA FRP | D - Hazard Evaluation and Risk Analysis | D.5 Discharge Scenarios | D.5.1 Worst Case Discharge Scenarios	
10/4/2011	10 - EPA USCG PHMSA FRP | D - Hazard Evaluation and Risk Analysis | D.9 Product Characteristics and Hazards | D.9.1 Summary of Commodity Characteristics	
10/4/2011	10 - EPA USCG PHMSA FRP | 2 - Initial Response Actions | 2.7 Fire Pre Plans	
10/5/2011	10 - EPA USCG PHMSA FRP | 3 - Notifications / Telephone Numbers | 3.1 Emergency Information and Notification Procedures | Figure 3.1-3 - Internal Notifications and Telephone Numbers | Emergency Response Personnel and Business Unit Notifications	

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DATE OF CHANGE	DESCRIPTION OF CHANGE	PAGE NUMBER
10/5/2011	10 - EPA USCG PHMSA FRP | 1 - Introduction | Figure 1-3 - Facility Area Map	
10/12/2011	10 - EPA USCG PHMSA FRP | 3 - Notifications / Telephone Numbers | 3.1 Emergency Information and Notification Procedures | Figure 3.1-3 - Internal Notifications and Telephone Numbers | Emergency Response Personnel and Business Unit Notifications	
1/3/2012	10 - EPA USCG PHMSA FRP | 3 - Notifications / Telephone Numbers | 3.1 Emergency Information and Notification Procedures | Figure 3.1-3 - Internal Notifications and Telephone Numbers | Emergency Response Contractors	
1/3/2012	10 - EPA USCG PHMSA FRP | 3 - Notifications / Telephone Numbers | 3.1 Emergency Information and Notification Procedures | Figure 3.1-4 - External Notifications and Telephone Numbers | USCG Classified OSRO's / Non-Classified OSRO's	
1/3/2012	10 - EPA USCG PHMSA FRP | 7 - Sustained Response Actions | 7.1 Response Resources | Figure 7.1-1 - Regional Company and Response Contractor's Equipment List / Response Time	
1/3/2012	10 - EPA USCG PHMSA FRP | B - Contractor Response Equipment | B.1 Cooperatives and Contractors | B.1.1 OSRO Classification	
1/3/2012	10 - EPA USCG PHMSA FRP | B - Contractor Response Equipment | B.1 Cooperatives and Contractors | Figure B.1-1 - Evidence of Contracts	
3/19/2012	10 - EPA USCG PHMSA FRP | E - Cross-References | Figure E-5 - EPA Response Plan Cover Sheet | Applicability of Substantial Harm Criteria	
3/19/2012	10 - EPA USCG PHMSA FRP | D - Hazard Evaluation and Risk Analysis | D.5 Discharge Scenarios | D.5.1 Small and Medium Discharge Scenarios	
3/19/2012	10 - EPA USCG PHMSA FRP | 3 - Notifications / Telephone Numbers | 3.1 Emergency Information and Notification Procedures | Figure 3.1-3 - Internal Notifications and Telephone Numbers | Facility Response Team	

3/19/2012	10 - EPA USCG PHMSA FRP | 3 - Notifications / Telephone Numbers | 3.1 Emergency Information and Notification Procedures | Figure 3.1-3 - Internal Notifications and Telephone Numbers | Emergency Response Contractors	
3/19/2012	10 - EPA USCG PHMSA FRP | 3 - Notifications / Telephone Numbers | 3.1 Emergency Information and Notification Procedures | Figure 3.1-4 - External Notifications and Telephone Numbers | USCG Classified OSRO's / Non-Classified OSRO's	
3/19/2012	10 - EPA USCG PHMSA FRP | 7 - Sustained Response Actions | 7.1 Response Resources | Figure 7.1-1 - Regional Company and Response Contractor's Equipment List / Response Time	

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3/19/2012	10 - EPA USCG PHMSA FRP | B - Contractor Response Equipment | B.1 Cooperatives and Contractors | B.1.1 OSRO Classification	
3/19/2012	10 - EPA USCG PHMSA FRP | B - Contractor Response Equipment | B.1 Cooperatives and Contractors | Figure B.1-1 - Evidence of Contracts	
3/19/2012	10 - EPA USCG PHMSA FRP | 3 - Notifications / Telephone Numbers | 3.1 Emergency Information and Notification Procedures | Figure 3.1-4 - External Notifications and Telephone Numbers | External Notifications	
3/19/2012	10 - EPA USCG PHMSA FRP | 7 - Sustained Response Actions | 7.1 Response Resources | 7.1.1 Response Equipment	
3/19/2012	10 - EPA USCG PHMSA FRP | 7 - Sustained Response Actions | 7.1 Response Resources | 7.1.6 Communications Plan	
3/19/2012	10 - EPA USCG PHMSA FRP | 2 - Initial Response Actions | 2.6 Evacuation | 2.6.2 Evacuation Factors	
3/19/2012	10 - EPA USCG PHMSA FRP | 6 - Sensitive Areas / Response Tactics | 6.7 Vulnerability Analysis	
3/19/2012	10 - EPA USCG PHMSA FRP | D - Hazard Evaluation and Risk Analysis | D.2 Vulnerability Analysis | D.2.1 Analysis of the Potential for a Spill	

3/19/2012	10 - EPA USCG PHMSA FRP | D - Hazard Evaluation and Risk Analysis | D.5 Discharge Scenarios | D.5.1 Small Discharge Response Resource	
3/19/2012	10 - EPA USCG PHMSA FRP | D - Hazard Evaluation and Risk Analysis | D.5 Discharge Scenarios | D.5.1 Medium Discharge Scenarios	
3/19/2012	10 - EPA USCG PHMSA FRP | D - Hazard Evaluation and Risk Analysis | D.5 Discharge Scenarios | D.5.1 Medium Discharge Response Resource	
3/19/2012	10 - EPA USCG PHMSA FRP | D - Hazard Evaluation and Risk Analysis | D.5 Discharge Scenarios | D.5.1 Worst Case Discharge Scenarios	
3/19/2012	10 - EPA USCG PHMSA FRP | D - Hazard Evaluation and Risk Analysis | D.5 Discharge Scenarios | D.5.1 Worst Case Discharge Response Resource	

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DATE OF CHANGE	DESCRIPTION OF CHANGE	PAGE NUMBER
3/19/2012	10 - EPA USCG PHMSA FRP | D - Hazard Evaluation and Risk Analysis | D.5 Discharge Scenarios | D.5.3 Description of Factors Affecting Response Efforts	
3/19/2012	10 - EPA USCG PHMSA FRP | D - Hazard Evaluation and Risk Analysis | D.5 Discharge Scenarios | D.5.3 Description of Factors Affecting Response Efforts	
3/19/2012	10 - EPA USCG PHMSA FRP | D - Hazard Evaluation and Risk Analysis | D.3 Spill Detection / Prevention Inspection | D.3.1 Spill Detection	
3/19/2012	10 - EPA USCG PHMSA FRP | C - Tank Tables, Company Forms, Plot Plans | Figure C-9 - Containment and Drainage Planning	
3/19/2012	10 - EPA USCG PHMSA FRP | 1 - Introduction | 1.1 Purpose / Scope of Plan	
3/20/2012	10 - EPA USCG PHMSA FRP | C - Tank Tables, Company Forms, Plot Plans | Figure C-1 - Tank Tables	
3/20/2012	10 - EPA USCG PHMSA FRP | 1 - Introduction | Figure 1-2 - Information Summary | Information Summary	
	10 - EPA USCG PHMSA FRP | 7 - Sustained Response	

3/21/2012	Actions | 7.1 Response Resources | 7.1.2 Response Equipment Inspection and Maintenance	
3/21/2012	10 - EPA USCG PHMSA FRP | D - Hazard Evaluation and Risk Analysis | D.2 Vulnerability Analysis | D.2.1 Analysis of the Potential for a Spill (Natural disasters)	
4/17/2012	10 - EPA USCG PHMSA FRP | 3 - Notifications / Telephone Numbers | 3.1 Emergency Information and Notification Procedures | Figure 3.1-3 - Internal Notifications and Telephone Numbers | Emergency Response Personnel and Business Unit Notifications	
4/17/2012	10 - EPA USCG PHMSA FRP | 3 - Notifications / Telephone Numbers | 3.1 Emergency Information and Notification Procedures | Figure 3.1-3 - Internal Notifications and Telephone Numbers | Emergency Response Personnel and Business Unit Notifications	
5/24/2012	10 - EPA USCG PHMSA FRP | 3 - Notifications / Telephone Numbers | 3.1 Emergency Information and Notification Procedures | Figure 3.1-3 - Internal Notifications and Telephone Numbers | Facility Tactical Response Team	
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5/24/2012	10 - EPA USCG PHMSA FRP | 7 - Sustained Response Actions | 7.1 Response Resources | 7.1.1 Response Equipment	
5/24/2012	10 - EPA USCG PHMSA FRP | 7 - Sustained Response Actions | 7.1 Response Resources | 7.1.6 Communications Plan	
5/24/2012	10 - EPA USCG PHMSA FRP | 1 - Introduction | Figure 1-2 - Information Summary | Information Summary	
5/24/2012	10 - EPA USCG PHMSA FRP | 1 - Introduction | Figure 1-2 - Information Summary | Line Sections	
5/24/2012	10 - EPA USCG PHMSA FRP | C - Tank Tables, Company Forms, Plot Plans | Figure C-9 - Containment and Drainage Planning	

5/24/2012	10 - EPA USCG PHMSA FRP | C - Tank Tables, Company Forms, Plot Plans | Figure C-1 - Tank Tables	
5/24/2012	10 - EPA USCG PHMSA FRP | D - Hazard Evaluation and Risk Analysis | D.7 Spill Volume Calculations | D.7.1 USCG Portion of Facility	
6/4/2012	10 - EPA USCG PHMSA FRP | 3 - Notifications / Telephone Numbers | 3.1 Emergency Information and Notification Procedures | Figure 3.1-3 - Internal Notifications and Telephone Numbers | Facility Tactical Response Team	
6/4/2012	10 - EPA USCG PHMSA FRP | D - Hazard Evaluation and Risk Analysis | D.7 Spill Volume Calculations | D.7.1 USCG Portion of Facility - Text	
6/4/2012	10 - EPA USCG PHMSA FRP | 1 - Introduction | Figure 1-2 - Information Summary | Information Summary	
6/4/2012	10 - EPA USCG PHMSA FRP | 1 - Introduction | Figure 1-2 - Information Summary | Information Summary	
6/7/2012	10 - EPA USCG PHMSA FRP | 1 - Introduction | 1.3 Certification of Adequate Resources	
6/8/2012	10 - EPA USCG PHMSA FRP | 3 - Notifications / Telephone Numbers | 3.1 Emergency Information and Notification Procedures | Figure 3.1-3 - Internal Notifications and Telephone Numbers | Facility Tactical Response Team	

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7/11/2012	10 - EPA USCG PHMSA FRP | 1 - Introduction | Figure 1-2 - Information Summary | Information Summary	
7/11/2012	10 - EPA USCG PHMSA FRP | 1 - Introduction | Figure 1-2 - Information Summary | Line Sections	
7/11/2012	10 - EPA USCG PHMSA FRP | 1 - Introduction | Figure 1-2 - Information Summary | Line Sections	
7/11/2012	10 - EPA USCG PHMSA FRP | 2 - Initial Response Actions | 2.7 Fire Pre Plans	
7/11/2012	10 - EPA USCG PHMSA FRP | 2 - Initial Response Actions | 2.7 Fire Pre Plans	
7/11/2012	10 - EPA USCG PHMSA FRP | C - Tank Tables, Company	

	Forms, Plot Plans | Figure C-8 - Reportable Spill History	
7/11/2012	10 - EPA USCG PHMSA FRP | C - Tank Tables, Company Forms, Plot Plans | Figure C-8 - Reportable Spill History	
7/11/2012	10 - EPA USCG PHMSA FRP | D - Hazard Evaluation and Risk Analysis | D.5 Discharge Scenarios | D.5.1 Small Discharge Scenarios	
7/11/2012	10 - EPA USCG PHMSA FRP | D - Hazard Evaluation and Risk Analysis | D.5 Discharge Scenarios | D.5.1 Medium Discharge Scenarios	
7/11/2012	10 - EPA USCG PHMSA FRP | D - Hazard Evaluation and Risk Analysis | D.5 Discharge Scenarios | D.5.1 Worst Case Discharge Scenarios	
7/16/2012	10 - EPA USCG PHMSA FRP | D - Hazard Evaluation and Risk Analysis | D.5 Discharge Scenarios | D.5.1 Worst Case Discharge Scenarios	
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7/23/2012	10 - EPA USCG PHMSA FRP | 3 - Notifications / Telephone Numbers | 3.1 Emergency Information and Notification Procedures | Figure 3.1-3 - Internal Notifications and Telephone Numbers | Emergency Response Personnel and Business Unit Notifications	

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7/23/2012	10 - EPA USCG PHMSA FRP | 1 - Introduction | Figure 1-1 - Distribution List	
7/23/2012	10 - EPA USCG PHMSA FRP | 6 - Sensitive Areas / Response Tactics | 6.7 Vulnerability Analysis Text | Residential Areas	
7/23/2012	10 - EPA USCG PHMSA FRP | D - Hazard Evaluation and Risk Analysis | D.5 Discharge Scenarios | D.5.1 Small Discharge Scenarios	
7/23/2012	10 - EPA USCG PHMSA FRP | C - Tank Tables, Company Forms, Plot Plans | Figure C-9 - Containment and Drainage Planning	
	10 - EPA USCG PHMSA FRP | 3 - Notifications / Telephone Numbers | 3.1 Emergency Information and Notification	

7/24/2012	Procedures | Figure 3.1-4 - External Notifications and Telephone Numbers | External Notifications	
7/24/2012	10 - EPA USCG PHMSA FRP | 1 - Introduction | Figure 1-2 - Information Summary | Information Summary	
7/24/2012	10 - EPA USCG PHMSA FRP | 6 - Sensitive Areas / Response Tactics | 6.7 Vulnerability Analysis Text | Water Intakes	
7/24/2012	10 - EPA USCG PHMSA FRP | D - Hazard Evaluation and Risk Analysis | D.5 Discharge Scenarios | D.5.1 Small Discharge Scenarios	
7/24/2012	10 - EPA USCG PHMSA FRP | D - Hazard Evaluation and Risk Analysis | D.5 Discharge Scenarios | D.5.1 Medium Discharge Scenarios	
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7/24/2012	10 - EPA USCG PHMSA FRP | D - Hazard Evaluation and Risk Analysis | D.5 Discharge Scenarios | D.5.3 Description of Factors Affecting Response Efforts	
7/24/2012	10 - EPA USCG PHMSA FRP | C - Tank Tables, Company Forms, Plot Plans | Figure C-9 - Containment and Drainage Planning	
7/24/2012	10 - EPA USCG PHMSA FRP | 7 - Sustained Response Actions | 7.1 Response Resources | 7.1.1 Response Equipment	

RECORD OF CHANGES**, CONTINUED**

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DATE OF CHANGE	DESCRIPTION OF CHANGE	PAGE NUMBER
8/3/2012	10 - EPA USCG PHMSA FRP | 3 - Notifications / Telephone Numbers | 3.1 Emergency Information and Notification Procedures | Figure 3.1-4 - External Notifications and Telephone Numbers | External Notifications	
9/12/2012	10 - EPA USCG PHMSA FRP | 3 - Notifications / Telephone Numbers | 3.1 Emergency Information and Notification Procedures | Figure 3.1-3 - Internal Notifications and Telephone Numbers | Emergency Response Personnel and Business Unit Notifications	
9/12/2012	10 - EPA USCG PHMSA FRP | C - Tank Tables, Company Forms, Plot Plans | Figure C-1 - Tank Tables	

9/17/2012	10 - EPA USCG PHMSA FRP | 1 - Introduction | Figure 1-5 - Facility Site Plan	
9/17/2012	10 - EPA USCG PHMSA FRP | 1 - Introduction | Figure 1-5 - Facility Site Plan	
9/17/2012	10 - EPA USCG PHMSA FRP | C - Tank Tables, Company Forms, Plot Plans | Figure C-2 - Drainage Diagram	
9/17/2012	10 - EPA USCG PHMSA FRP | C - Tank Tables, Company Forms, Plot Plans | Figure C-3 - Evacuation Diagram	
10/17/2012	10 - EPA USCG PHMSA FRP | 1 - Introduction | Figure 1-5 - Facility Site Plan	
10/17/2012	10 - EPA USCG PHMSA FRP | 1 - Introduction | Figure 1-5 - Facility Site Plan	
10/17/2012	10 - EPA USCG PHMSA FRP | 1 - Introduction | Figure 1-3 - Facility Area Map	
10/17/2012	10 - EPA USCG PHMSA FRP | C - Tank Tables, Company Forms, Plot Plans | Figure C-2 - Drainage Diagram	
10/17/2012	10 - EPA USCG PHMSA FRP | C - Tank Tables, Company Forms, Plot Plans | Figure C-3 - Evacuation Diagram	
10/19/2012	10 - EPA USCG PHMSA FRP | 1 - Introduction | 1.4 Agency Submittal / Approval Letters	

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DATE OF CHANGE	DESCRIPTION OF CHANGE	PAGE NUMBER
11/12/2012	10 - EPA USCG PHMSA FRP | 1 - Introduction | Figure 1-2 - Information Summary | Information Summary	
11/12/2012	10 - EPA USCG PHMSA FRP | Table of Contents | Record of Reviews	
11/12/2012	10 - EPA USCG PHMSA FRP | 3 - Notifications / Telephone Numbers | 3.1 Emergency Information and Notification Procedures | Figure 3.1-3 - Internal Notifications and Telephone Numbers | Emergency Response Personnel and Business Unit Notifications	
11/15/2012	10 - EPA USCG PHMSA FRP | 3 - Notifications / Telephone Numbers | 3.1 Emergency Information and Notification Procedures | Figure 3.1-4 - External Notifications and Telephone Numbers | External Notifications	

SECTION 1 Last Revised: November 2012

INTRODUCTION

FIGURE 1-1 - DISTRIBUTION LIST

PLAN HOLDER	ADDRESS	NUMBER OF PAPER COPIES	NUMBER OF ELECTRONIC COPIES
Terminal Manager, Carteret Terminal, Jack Cowart	760 Roosevelt Ave Carteret, NJ 07008	1	
U.S. Environmental Protection Agency - Region II Response and Prevention Branch	2890 Woodbridge Avenue, Building 209, MS-211 Edison, NJ 08837	1	
U.S. DOT Office of Pipeline Safety, Attn.: Response Plan Officer	1200 New Jersey Avenue, SE - Room E22-210 Washington, D.C. 20590		2
Commander Coast Guard Activities, New York Preparedness Section	212 Coast Guard Drive Staten Island, NY 10305	1	

FIGURE 1-2 - CARTERET INFORMATION SUMMARY

Owner:	**Operator:**
BP Products North America Inc. 150 W. Warrenville Rd Naperville , IL 60563 (630) 420-5519 (Fax) (630) 536-2161 (Phone)	BP Pipeline U.S. and Logistics 150 W. Warrenville Rd Naperville , IL 60563 (630) 420-5519 (Fax) (630) 536-2161 (Phone)

Facility Name:	Carteret
Facility Address:	760 Roosevelt Avenue Carteret, NJ 07008
(b) (7)(F) [redacted]	
Facility Telephone/Fax:	(732) 541-5131 / (732) 541-9434
EPA Facility FRP #:	NY-036
PHMSA Facility FRP #:	1713
USCG Facility FRP #:	NY-036 / KIBOF018

FIGURE 1-2 - CARTERET INFORMATION SUMMARY, CONTINUED

Description of Facility:
The Carteret Terminal (hereinafter referred to as "Facility") is owned and operated by BP

Products North America, Inc., U.S. Pipelines and Logistics. This is a complex facility and subject to EPA, US Coast Guard, and US Department of Transportation Pipeline and Hazardous Materials Safety Administration (USDOT PHMSA) regulatory requirements, as well as the State of New Jersey Discharge Prevention, Containment and Countermeasure (DPCC); Discharge Cleanup and Removal (DCR) regulations for major facilities (i.e., facilities with a combined storage capacity for 200,000 gallons or more for petroleum or petroleum products). This complex facility's SIC code is 1571 and NAICS code is 424710. The Facility is located in a mixed use (i.e., residential, commercial, and industrial) area of Carteret, New Jersey. The Facility is divided into two sections: 1) the upper, western portion (the Upper Facility) that includes the terminal offices, truck loading rack, and petroleum storage and 2) the lower, eastern portion (the Lower Facility or BP Dock) that includes the Facility-owned marine transfer facility. The Upper Facility is bordered by Peter J. Sica Industrial Highway to the northeast; New Jersey Turnpike entrance ramps to the northwest; Roosevelt Avenue to the west; commercial/industrial businesses to the south; and residences along Bristol Station Court to the southeast. The Lower Facility (the BP Dock) is on the eastern shore of the Arthur Kill, near the mouth of the Rahway River. The Lower Facility and part of the Upper Facility are located on a tidal marsh. The pipeline connecting the Upper and Lower Facilities is located adjacent to a tidal marsh.

(b) (7)(F)

There are no ASTs that are closed or out of service, but tanks that are not in use or decommissioned are marked permanently closed while tanks that are temporarily not in use are marked out of service. There are no buried tanks/bulk containers (i.e., underground storage tank, UST) at the Facility. The Facility receives denatured ethanol, gasoline, and distillates via marine vessels (i.e., ships and barges), pipelines, and trucks. Additives are typically received via tanker truck and drums and other portable container deliveries are received via truck. The Facility ships products out via truck, marine vessels, and pipeline. The facility conducts marine transfers of products to and from storage at the BP Dock located on Arthur Kill. In addition, marine vessels are fueled at the BP Dock.

The Terminal Truck Loading/Unloading Rack (the Loading Rack) has four (4) bays with a total of 15 bottom-loading positions and four (4) top loading positions. Up to four (4) trucks can be loaded simultaneously. Maximum loading rates at the truck racks are 600 gallons per minute (gpm). Tanker trucks and trailers are equipped with multiple compartments and each compartment has a maximum capacity of 4,000 gallons. The maximum overall truck and trailer capacity is 9,000 gallons. Containment at the Loading Rack is adequate to contain the maximum capacity of any single compartment of a tanker truck or trailer. Approved tanker

truck drivers have Terminal access 24 hours per day, seven days per week and must have a Scully overfill protection system and equipment for vapor recovery as a condition of being allowed access for loading. Truck loading permissions are managed in the Terminal Automated System.

FIGURE 1-2 - CARTERET INFORMATION SUMMARY, CONTINUED

Current Operations

***Facility Data: (See APPENDIX C for date and type of substantial expansion)**

The Terminal serves as a petroleum distribution center for peripheral retail gasoline service stations, commercial and industrial sales customers, and jobber bulk plants. The Terminal is a bulk fuel distribution terminal with marine and tanker truck transfer operations. Daily operations at the Facility include product receipt and distribution, transfer of product from tank to tank within the Facility, inventory checking, routine maintenance, and inspections. Products (i.e., gasoline and distillate fuels [diesel fuel, heating oil], and denatured ethanol) are delivered to the Facility via vessels (i.e., barges and tanker ships) and via US Department of Transportation (US DOT) Pipelines and Hazardous Materials Safety Administration (PHMSA) regulated pipelines. Products are delivered to customers via pipelines, vessels and trucks (straight tank truck and tanker transports. Truck loading activities continue 24 hours a day, 7 days a week. Emergency Shut Down (ESD) switches are located at the loading rack and inside the terminal office. The office is normally staffed from 8 a.m. to 5 p.m., Monday through Friday. Other daily operations at the Facility include venting, routine maintenance, and inspections, and transfer of product from tank to tank within the Facility. Procedures have been established for these operations and Terminal personnel are trained in these procedures. Terminal inventory is checked daily through the gauging of tanks and maintaining records of receipts and sales. Routine maintenance is ongoing and may include repair/replacement of valves, pumps and transfer piping. Visual inspections of the entire Facility are conducted each shift by the Facility personnel, in addition to documented monthly and annual inspections and periodic tank and pipeline integrity testing. Routine operations are as follow:

Venting
Venting is generally through the roof of the tank and poses very low probability of discharge. Tanks used to store gasoline have floating roofs to minimize vapors, and the subsequent need for venting.

Piping Repair and Replacement
This is not a common activity at the Facility, but when it occurs, the line is isolated and drained. The risk of discharge occurs when a line is opened for maintenance activities. The amount of product that could be spilled would be limited to the amount in the pipe at the time it is opened. Common practice is to have a containment pan ready with either a transfer pump or a vacuum truck available to transfer the product to a containment vessel.

Valve Maintenance
There are two types of valve maintenance activities at this facility. Work performed while the valve remains in-line, and work that requires removal of the valve. In the event of the latter, the risk of spillage would be the same as that found in piping repair noted previously. When the valve is left in-line during maintenance, the possibility of spillage is very low as the work is generally external to the valve and exposure to the product inside minimal.

Tank Transfer
The transfer of one tank's contents to another is typically performed through fixed piping and

fixed connections, thus the risk of spillage is very low and quite rare. Tank-to-tank transfers are typically performed by an operator who manually determines the required transfer amount (as a corresponding height increase in the receiving tank). As the transfer approaches completion, the operator remains at the receiving tank to measure the fill height and control the tank's inlet valve. The risk of spillage increases when a tank is being removed from service and the tank is emptied. The final removal of product is through temporary transfer hoses and pumps. Due to the number of connections involved the risk of discharge increases dramatically. This is not a normal practice, and when it is necessary personnel remain with the transfer and are prepared to perform a quick shutdown, if necessary.

Current staff consists of operators and office personnel. Office personnel include the Terminal Manager (QI), terminal operators, and clerks. At least once daily (Monday through Sunday), the Terminal facility is inspected for spills and leaks. The facility performs a daily cut-off to balance loading meters and perform a gain/loss report on the storage tanks. During the day, normal maintenance is performed on operational equipment as needed. Tank gauges are read and calculated to ensure that incoming pipeline receipts can be accepted with no containment problems. Periodic safety meetings are performed including all employees.

Dates and Types of Substantial Expansions
(See APPENDIX C, FIGURE C-1 for additional information on tanks)
1923 - Facility operations begin; facility consists of office and warehouse; Tanks 11, 17, 18, 19, 25, 26, 27, and 28; truck loading rack; and dock.
1940 - Tanks 70 and 71 added
1947 - Tanks 94 and 95 added
1955 - Tanks 16 and 23 added
1979 - Tanks 10, 14, and 15 added
1992 - Dock slop tank (A-27) added
1996 - Diesel dye tank (A-29) added (subsequently removed)
1997 - Distillate tank (4,000-gallon capacity) added (subsequently removed)
1998 - Constructed Foam House for foam supply pump and fire water pump
1999 - Three (3) pumps and associated piping for Tanks 27 and 28 added
2001 - Tank A-28 added
2001 - Two (2) pumps and associated piping for Tank 71 and two (2) pumps and associated piping for Tank 95 added as part of blending project
2002 - Two (2) pumps and associated piping for Tank 10 added as part of blending project
2004 - Tank 94 removed
2004 - Tank 96 added
2006 - Drum Storage and Salt Storage buildings constructed
2010 - Tanks 10A and 109 added
2010 - Dredge shipping channel
2011 - New MVRU (second John Zink at BP Dock)Certification and Start-Up
2012 - New Quality Control Laboratory added.

FIGURE 1-2 - CARTERET INFORMATION SUMMARY, CONTINUED

Size, Type, and Number of Vessels the Facility can Transfer Oil to or from Simultaneously:
Marine transfers involve receipt of products into above ground storage tanks from vessels at the Dock. Marine vessels (i.e., barges) are third party owned/operated. Marine transfers occur during 24 hours per day, seven days per week.

(b) (7)(F)

(b) (7)(F)

(b) (7)(F)

Pumps used to for marine transfer monitored by the assigned operator throughout each transfer. The operator is required to cease tank filling and close valves as soon as upset conditions, including tank overflow, leaks and spills, occur.

Drips and hose residuals associated with marine transfers are gravity drained or manually pumped to a drainage receiver tank of 1,800 gallons. It was installed new in 1992, and passed an initial integrity test in 1993. The receiver tank has high level alarming to prevent overfilling, and this tank is routinely emptied to provide adequate containment capacity for transfers. Currently there is no marine transfer equipment permanently closed or out of service.

The dock area is well lighted, and operations are conducted in accordance with the procedures in the Facility's US Coast Guard Operations Manual. Containment boom is deployed around vessels conducting transfers of oil products with a flash point greater than 100°F prior to commencing a transfer.

FIGURE 1-2 - CARTERETINFORMATION SUMMARY, CONTINUED

Qualified Individuals: (Refer to APPENDIX A, FIGURE A.2-3 for QI Training Records)	**Facility**		
	Name and Contact Information	**Work Address**	(b) (6)
	Jack Cowart Terminal Manager Alternate Incident Commander Alternate Qualified Individual (732) 541-5131 x605 (Office), (732) 969-0143 (Fax) (Office) (724) 759-3560 (Mobile)	100 E. Standard Oil Road Rochelle, IL 61068	(b) (6)

Julea Mitchell Area Operations Manager Alternate Incident Commander / Command Staff Support Primary Qualified Individual (732) 541-5131 ext. 609 (Office) (732) 423-5037 (Mobile)	760 Roosevelt Avenue Carteret, NJ 07008	Available upon request ,

Business Unit		
Name and Contact Information	**Work Address**	**Home Address**

FIGURE 1-2 - CARTERET INFORMATION SUMMARY, CONTINUED

Line Sections/ Products Handled: (Refer to Product Characteristic and Hazards, FIGURE D.9-1)

SECTION	PRODUCT	DIAMETER
Colonial and Kinder Morgan to Terminal	Gasoline, Diesel, Denatured Ethanol	14
Buckeye Pipeline to Colonial and Kinder Morgan	Gasoline, Diesel, Denatured Ethanol	12.75

Facility Data: (See APPENDIX C for date and type of substantial expansion)

Location (Address and County)	**Hours of Operations/ Manning**	**Throughput**	**Date of Startup**	**Wellhead Protection Area**
760 Roosevelt Avenue Carteret, Middlesex, NJ 07008	The regular business hours are Mon-Fri, 8 am - 5 pm. Facility is manned 24 hours/day.	31,190 bbls per day both Gasoline and Diesel	1923	No
River Mile				

Description of Zone:

Product is also received and shipped via DOT/PHMSA regulated pipelines, which are operated by Colonial Pipeline Company (Colonial) and Buckeye Pipeline Company (Buckeye). The portion of the Carteret Terminal pipeline system between the BP Dock and Upper Facility is regulated by 49 CFR 195 from the Valve Pit to the Colonial and Kinder Morgan Pipeline manifold. The outbound Buckeye Pipeline delivers product to Colonial and Kinder Morgan is also covered under this regulation.

Product form the Colonial Pipeline enters the Upper Facility near the northwestern corner, near Tank 18. The first valve inside containment for this pipeline is at the Colonial and Kinder Morgan Pipeline manifold, where products can be transferred to facility piping and

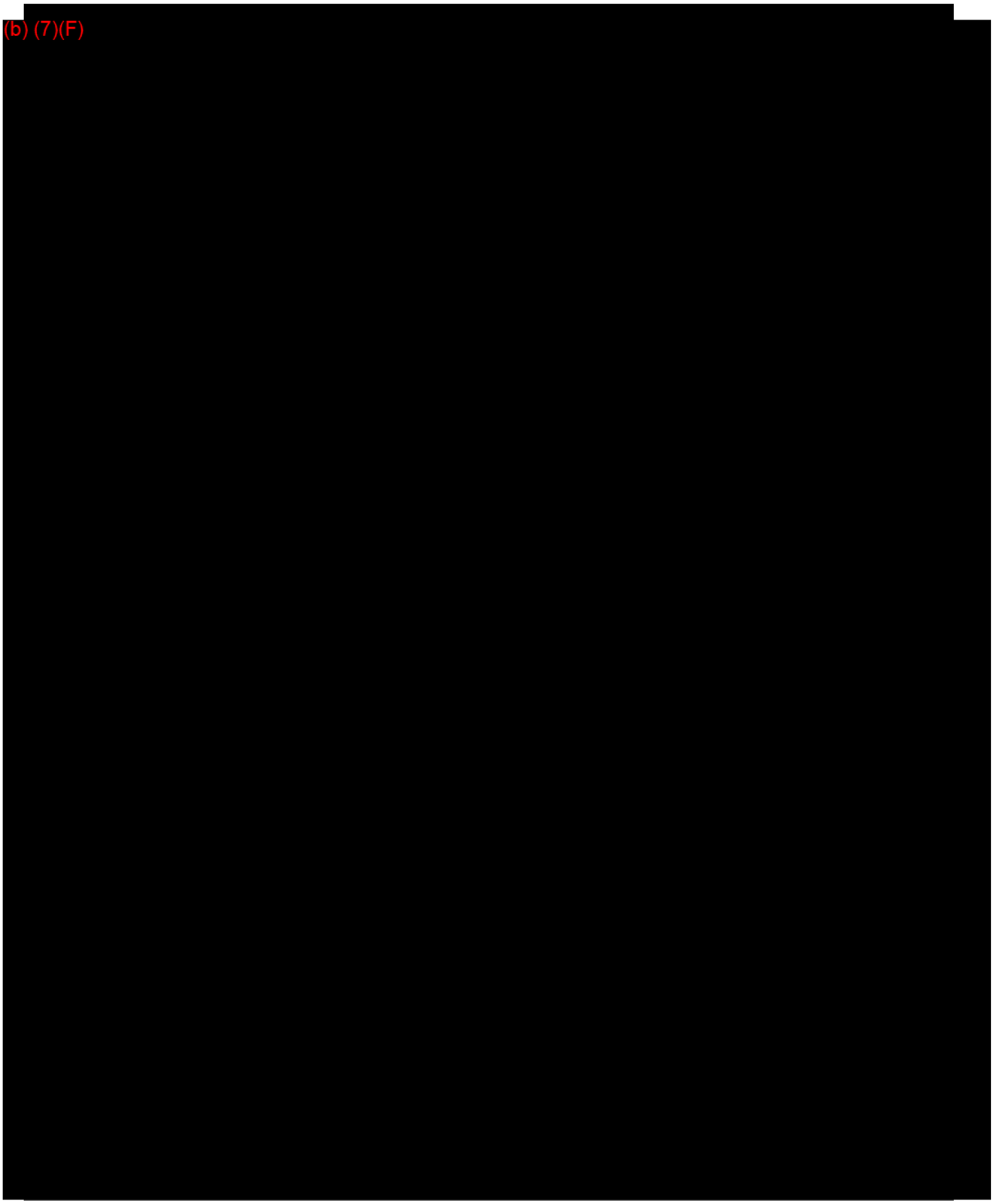
	delivered to and from the large ASTs. The pipeline carries refined oil (including Alkylate, Denatured Ethanol, Diesel Fuel, Gasoline, Naphtha) in the areas shown in **FIGURE 1-3** and **FIGURE 1-4**
Response Zone Consists of the Following Counties:	Middlesex
Alignment Maps (Piping, Plan Profiles):	Maintained at: On site
(b) (7)(F) [redacted]	(b) (7)(F) [redacted]
Statement of Significant and Substantial Harm:	The response zones in this system all contain pipelines greater than 6 5/8 inches and are longer than ten miles. At least one section of pipeline in each response zone crosses a major waterway or comes within five miles of a public drinking water intake. Therefore, in accordance with 49 CFR 194.103(c), each entire response zone described in this Plan will be treated as if expected to cause significant and substantial harm.
Spill Detection and Mitigation Procedures:	Refer to **SECTION 2.1.1, APPENDIX D.2.1 and APPENDIX D.3.**
Date Prepared / Last Update:	October 2012

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

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

FIGURE 1-3 - FACILITY AREA MAP

(b) (7)(F)



Carteret Page 1 - 10

FIGURE 1-4 - FACILITY PHOTOGRAPH

(b) (7)(F)

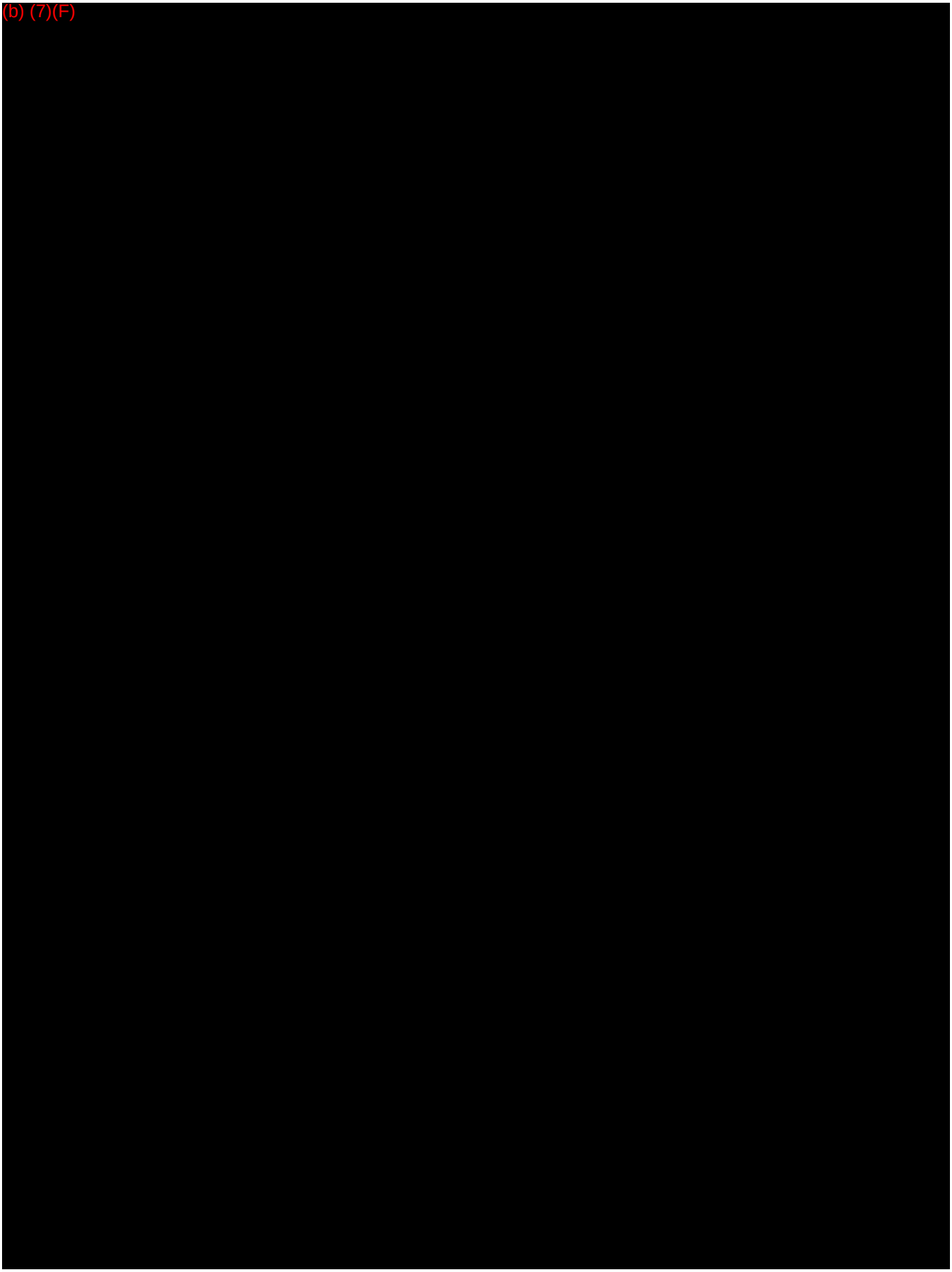


FIGURE 1-5 - FACILITY SITE PLAN

Click here to view - Facility Site Plan Upper Plant 10/17/2012.

FIGURE 1-5 - FACILITY SITE PLAN, CONTINUED

Click here to view - Facility Site Plan Lower Plant 10/17/2012.

FIGURE 1-6 - PIPELINE OVERVIEW

Click here to view - Pipeline Overview.

1.1 PURPOSE / SCOPE OF PLAN

The purpose of this Emergency Response Plan (Plan) is to provide guidelines to quickly, safely, and effectively respond to a spill. The Facility is owned and operated by BP Pipeline U.S. and Logistics, herein referred to as "Company." This Plan contains prioritized procedures for Facility personnel to mitigate or prevent any discharge resulting from in-facility (terminal) operations, including hazardous waste. A copy of the "Hazardous Waste Contingency Plan" can be found in the Additional Information Appendix. Also, guidelines for waste management can be found in **SECTION 7.3**.

For more information on this plan, contact your supervisor, Regional Emergency Response and Crisis Management Coordinator.

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), and EPA Region II Regional Contingency Plan. Specifically, this Plan is intended to satisfy:

- U.S. Environmental Protection Agency (EPA) requirements for an OPA 90 Plan (40 CFR 112.20)
- U.S. Coast Guard (USCG) requirements for an OPA 90 Plan (33 CFR 154.1035)
- Pipeline and Hazardous Materials Safety Administration (PHMSA), U.S. Department of Transportation requirements for an OPA 90 Plan (49 CFR 194)
- Occupational Safety and Health Administration (OSHA) requirements for Emergency Response Plan (ERP) (29 CFR 1910.120) (1)(2)) and Emergency Action Plan (EAP) (29 CFR 1910.38 (a)(2)).

Specific references used in preparing this Plan include:

- Specific references used in preparing this Plan include: New York / New Jersey Area Committee and U.S. Coast Guard Sector New York New York and New Jersey Area Contingency Plan, December 2011; New York / New Jersey Area Committee and U.S. Coast Guard Sector New York New York and New Jersey Area Contingency Plan,

January 1999; National Oceanic and Atmospheric Administration - Hazardous Materials Response and Assessment Division Environmental Sensitivity Atlas New York-New Jersey Metropolitan Region; and US Army Corps of Engineers Waterway Navigation Charts 12331 and 12333 North and South Arthur Kill.

1.2 PLAN REVIEW AND UPDATE PROCEDURE

In accordance with 40 CFR 112.20, this Plan will be reviewed annually and modified to address new or different operating conditions or information included in the Plan. 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. EPA must receive the change within 60 days.

Upon review of the response plan for each five-year period, revisions will be submitted to PHMSA provided that changes to the current plan are needed, or a letter will be submitted to PHMSA stating that the plan is still current.

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

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

CONDITIONS REQUIRING REVISIONS AND SUBMISSIONS	**EPA**	PHMSA	USCG
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.	x	x	
A change in the Facility's configuration that materially alters the information included in the Plan.	x		x
A change in the type of oil handled, stored, or transferred that materially alters the required response resources.	x	x	x
A change in key personnel (Qualified Individuals).	x	x	
Material change in capabilities of the Oil Spill Removal Organization(s) (OSROs) that provide equipment and personnel.	x	x	
Material change in the Facility's spill prevention and response equipment or emergency response procedures.	x		x
Any other changes that materially affect the implementation of the Plan.	x	x	x
A change in the NCP or ACP that has significant impact on the equipment appropriate for response activities.		x	
A change in the name of the Oil Spill Removal Organization (OSRO).			x

A change in the Facility's operating area that includes ports or geographic area.			x

All requests for changes must be made through the Terminal Manager.

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

1.3 CERTIFICATION OF ADEQUATE RESOURCES

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

BP Pipeline U.S. and Logistics

The BP Pipeline U.S. and Logistics, hereby certify to the Pipeline and Hazardous Materials Safety Administration (PHMSA) of the Department of Transportation that they have obtained, through contract or other approved means, the necessary private personnel and equipment to respond, to the maximum extent practicable, to a worst case discharge or a substantial threat of such a discharge.

Kept on file at Facility

Jack Cowart
Terminal Manager
6/1/2012

1.4 AGENCY SUBMITTAL / APPROVAL LETTERS

Click here to view - EPA Region 2 Submittal 12/29/2008.

Click here to view - USCG Submittal 12/29/2008.

Click here to view - Terminal Plan Distribution Letter.

Click here to view - PHMSA Submittal 10/01/2010.

Click here to view - PHMSA Questionnaire 11/9/2010.

Click here to view - Terminal Plan Distribution Letter 5/30/2012.

Click here to view - Terminal Plan Distribution Letter 10/19/2012.

SECTION 2 Last revised: July 2012

INITIAL RESPONSE ACTIONS

SECTION 2

INITIAL RESPONSE ACTIONS, CONTINUED

FIGURE 2-1 - INITIAL RESPONSE ACTION GUIDELINES

RESPONSE ACTION	PERSON TAKING ACTION (INITIALS)	DATE/TIME ACTION TAKEN
First Responder / Tactical Response Team (TRT)		
If in Impacted/source area, leave immediately (life safety first). Activate alarms or otherwise alert asset personnel and workers.		
Pipeline Response in Right of Way (ROW): From safe distance, Identify character, exact source, amount, and extent of the release and other necessary items needed for notifications Control source of Incident, if safe to do so (i.e. trained per USPL HAZWOPER Policy, qualified and properly PPE equipped). Otherwise, leave the area immediately.		
If fixed facility: Evacuate Personnel from facility, if necessary • To safe muster point • Conduct personal accountability (Roll call). Identify and control source of Incident, if safe to do so (i.e. trained per USPL HAZWOPER Policy, qualified and properly PPE equipped). Otherwise, leave the area immediately.		

Initiate Notifications IMMEDIATELY or within 15 minutes of discovering a discharge or release.
 	
• Call 911 (fire, Police, EMT)
• NRC (if potential water impact) **(800-424-8802)**
• OSRO/Response Contractor
  • Better to Over Respond - call all OSROs
  • Refer to **FIGURE 3.1-4**
• Qualified Individual (Team Lead/Terminal Manager)
• BP Notification Center **(800-321-8642)**		

If safe to do so, work with Fire Department/trained responders to: Identify hazards: • Establish hazard control area, if necessary.* The area immediately surrounding a spill, leak, or discharge of hazardous material(s) which extends far enough to		

prevent adverse health and safety effects from the release[1]. Verify evacuation status: • Verify all Personnel have evacuated from the Hazard Control Area to pre-designated assembly areas. If necessary, communicate need to potentially evacuate personnel at adjacent properties/locations. **Note 1:** See USPL Hazardous Waste Operations and Emergency Response (Hazwoper) Policy in DRM. The DOT Emergency Response Guidebook may be used to initially delineate the Hot Zone, or Exclusion Zone. Hot zones cannot be reduced until confirmed by air monitoring.		

FIGURE 2-1 - INITIAL RESPONSE ACTION GUIDELINES, CONTINUED

RESPONSE ACTION	PERSON TAKING ACTION (INITIALS)	DATE/TIME ACTION TAKEN
First Responder / Tactical Response Team (TRT), Continued		
*If safe to do so, shut down potential ignition sources, including motors, electrical pumps, electrical power, boats, vehicles, hot work, etc.		
Fire alarm pull stations are located as follows: 1) Operations Control Room 2) End of hallway adjacent to exit door leading from main administrative office to the warehouse 3) Inside right of external entrance/exit of warehouse door to transport drivers' rest room and another within the maintenance workshop inside the warehouse 4) Within each of four gasoline loading rack kiosks 5) Within the marine dock house and four total on the marine dock main catwalk and the two barge loading cells.		
Incident Commander (Operations Team Leader/Terminal Manager)		
Ensure evacuation accountability (roll call) procedures implemented and confirm all personnel are accounted.		
Ensure notifications have been initiated/complete.		
Activate Tactical Response Team (TRT) and set up response organization (**SECTION 5** ICS-201-3).		
Assess the oil spill and/or Incident Potential . Determine if initial source control or containment has been established.		
Assess possible hazards to human health and the environment (including outside the fence line if at a fixed facility). Ensure Site Characterization and Monitoring is initiated near		

release site.		
If necessary: Initiate spill tracking and surveillance operations by activating surveillance aircraft and/or watercraft. Estimate trajectory of spill utilizing information in **SECTION 2.1.4**. Send photographer/videographer, if safe.		
Establish initial Incident Objectives and Priorities.		
Determine location of Incident Command Post (ICP) facilities and support. Assess operational requirements and resource requirements.		
Ensure ICS 201- Initial Incident Briefing Document is complete and distributed to Unified Command, IMT (if activated) and internal stakeholders (Refer to **SECTION 5**).		
Ensure compliance with all safety practices and procedures. Ensure initial safety briefings with TRT and field responders is conducted		
If no response is warranted, ensure that appropriate regulatory notifications have been made and no further action is taken.		
DOCUMENT the incident • Ensure all responders capture response actions in personal log (ICS 214/notebook) • Collect all incident documentation and file on-site in training files.		

FIGURE 2-1 - INITIAL RESPONSE ACTION GUIDELINES, CONTINUED

RESPONSE ACTION	PERSON TAKING ACTION (INITIALS)	DATE/TIME ACTION TAKEN
Environmental Unit Leader (Environmental Coordinator)		
Notify appropriate agencies (refer to **FIGURE 3.1-4**) • National Response Center **(800-424-8802)** • State Emergency Response Commission (SERC) • Local Emergency Planning Committee (LEPC), if applicable		
Ensure HSSE Manager has been notified of Incident.		
Initiate environmental monitoring and waste disposal coordination per Federal/State/Local requirements.		
Site Safety Officer (Safety Coordinator or asset employee)		
Obtain incident brief from Incident Commander.		
Initiate incident safety hazard analysis.		

Complete incident specific Site Safety Plan (refer to **SECTION 5** ICS 201-5).		
Incident Management Team (as appropriate to manage the incident)		
Implement all aspects of the Incident Command System (ICS) response framework.		
Initial Incident Command Post (ICP) will be designated by TRT. Consider secondary ICP accommodations due to incident size.		
Obtain ICS 201 from TRT. IMT IC will brief arriving IMT members and build response team and Unified Command (UC).		
Establish Communications Network.		
Prepare Strategic Objectives and Response Priorities and communicate to all responders.		
Set up information center. (Situation Unit Leader).		
Obtain updated spill trajectory. (Refer to **SECTION 2.1.4**.)		
Initiate documentation procedures. Document all response actions taken, including notifications, agency/media meetings, equipment and personnel mobilization and deployment, and are impacted.		
Assist in completion of regulatory agency notifications, if needed.		
Identify environmentally sensitive areas at risk and recommended protection based on trajectory. • Utilize Near-shore Response Guides, Technical Spill Consultants, USF&WS, local agency representatives. (Refer to **SECTION 6**.)		
Prepare an initial Incident Action Plan for the UC for the next operational period (NOP).		
Initiate development of Site Incident Specific Response Plans in anticipation of Unified Command request. • Waste management • Demobilization • Traffic (vessel, road, rail)- as necessary • Medical plan • Resource Management • Etc.		
Begin preparations for media relations.		

2.1 SPILL RESPONSE

FIGURE 2.1-1 - SPILL RESPONSE ACTION CHECKLIST

SPECIFIC RESPONSE ACTIONS	COMMENT
Line Break or Leak	
Shut down source/pumping equipment.	
Close upstream and downstream valves.	
Utilize Combustible Gas Indicator, O_2 meter, proper colorimetric indicator and other air sampling measurements (as applicable) to assure that areas are safe to enter for continued response operations.	
Mitigate spreading of the product as the situation demands. Potential containment strategies include: • Deployment of boom (Reference ACP for potential strategies); • Diking, trenching, and/or diversion; • Spreading sorbent material over the spill; and • Prevent the spill from entering water to the greatest extent possible.	
Determine the direction and expected duration of spill movement. Refer to **SECTION 2.1.2**.	
Drain the line section, as the situation demands.	
Request local authorities to establish scene security and traffic control in the area, as the situation demands.	
Make all necessary repairs.	
Return the line/rack to service when repairs are complete.	
Clean up spilled product to eliminate any possible environmental problems. Be alert for underground cables.	
If the spill escapes the containment area, review the location of socio-economic and environmentally sensitive areas identified in **SECTION 6**. Determine which of these may be threatened by the spill and direct the response operation to these locations. Initiate protection and recovery actions.	
Inform local utilities, telephone company, railway, etc., as necessary.	
Complete follow-up and written reporting, as the situation demands.	
Storage Tank Leak	
Shut down all tank product movement operations and isolate the tank.	
Initiate Confined Space Entry procedures, as applicable.	
Insure that the containment area drainage valve(s) is closed.	
If leak is near tank bottom, create and maintain a ‘water bottom’ to suspend the discharge of product.	
Utilize Combustible Gas Indicator, O_2 meter, proper colorimetric indicator and other air sampling measurements	

(as applicable) to assure that areas are safe to enter for continued response operations.	
Block drainage of spilled material from traveling off-site.	
Stop all traffic in hazardous area (inside and outside of property boundaries), as the situation demands.	

FIGURE 2.1-1 - SPILL RESPONSE ACTION CHECKLIST, CONTINUED

SPECIFIC RESPONSE ACTIONS	COMMENT
Storage Tank Leak, Continued	
Remove product from containment (at a sump or in a low area) with an explosion proof pump, oil skimmer, and/or vacuum truck w/skimmer attachments.	
If applicable, process remaining product through a separator system.	
Determine the direction and expected duration of spill movement. Refer to **SECTION 2.1.2**.	
Request that local authorities establish scene security and traffic control in the area, as necessary.	
Empty tank as soon as possible.	
Make all necessary repairs. Return the line/tank to service when repairs and integrity testing are completed.	
Clean up product spill to eliminate any possible environmental problems. Be alert for underground cables, conduits, etc.	
If necessary, call an approved waste removal company to handle the remaining sludge and residue from the containment area.	
If the spill escapes the containment area, review the location of socioeconomic and environmentally sensitive areas identified in **SECTION 6** and the ACP. Determine which of these may be threatened by the spill and direct the response operation to these locations. Initiate protection and recovery actions.	
Inform local operators such as utilities, telephone company, railway, as necessary.	
Complete follow-up and written reporting, as the situation demands.	
Leak or Spill at Truck Rack	
Evacuate personnel from the truck rack area, as the situation demands.	
Shut down all loading operations, pumps motors and loading	

valves.	
Guard against all sources of ignition.	
Secure the area. Stop all traffic from entering rack or hazardous area.	
If a line leak is involved, close off riser valves and/or tank valves.	
Clean area with sorbent material, flush (with water) all remaining product into a separator system.	
Resume truck loading operations as directed by Terminal Management.	
Truck Leaks/Spills Outside Terminal	
Notify local fire and police departments.	
Assist local responders (police) to secure the area.	

FIGURE 2.1-1 - SPILL RESPONSE ACTION CHECKLIST, CONTINUED

SPECIFIC RESPONSE ACTIONS	COMMENT
Truck Leaks/Spills Outside Terminal, Continued	
Notify Terminal Management of the incident with the following information: • Location of spill. • Size of spill. • Product type. • Present situation. • If assistance/equipment is required for cleanup. • If product spills on a highway or other impervious surface, clean area with sorbent materials, vacuum truck, or other cleanup equipment as available or necessary. If product has entered sewer system, advise the local Fire Department.	
Consider the need to evacuate area Facility. If requested, provide product information to local authorities (fire, police departments) as necessary.	
Marine Operation Spills/Leaks	
Shut down all engines/motors.	
Close all line and vessel manifold discharge valves.	
If hose rupture is involved, drain line into vessel, drums, or buckets and blank line to stop spill into water.	
Initiate Confined Space Entry procedures, as applicable.	
Utilize Combustible Gas Indicator, O_2 meter, proper colorimetric indicator and other air sampling measurements	

(as applicable) to assure that areas are safe to enter for continued response operations.	
If other than hose rupture, determine source of leak and stop discharge.	
Prevent discharge from entering the water if at all possible by: • Pumping from sump or deck drainage system into drums, tanks, containment area, or other storage facility. • Directing the flow into a containment or collection area away from the water, if feasible. • Placing containment boom or sorbent material around area (provided that a safe operating environment exists).	
If product enters the water and a safe operating environment exists, try to contain by: • Deploying spill response equipment (facility and/or contract) to prevent/mitigate spill impact (spreading of spill).	
Attempting to divert/contain the spill: • In quiet area or low current areas of the water. • Away from strong winds or in areas that could be affected by change in wind direction. • Away from areas of hazard to public, property improvements, marinas, water intakes, or any environmentally sensitive areas.	
Make all necessary repairs.	
Return the line/vessel to service when repairs are complete.	
Clean up spilled product to eliminate any possible environmental problems. Be alert for underground cables, etc.	

FIGURE 2.1-1 - SPILL RESPONSE ACTION CHECKLIST, CONTINUED

SPECIFIC RESPONSE ACTIONS	COMMENT
Marine Operation Spills/Leaks, Continued	
If the spill escapes the containment area, review the location of socioeconomic and environmentally sensitive areas identified in **SECTION 6** and the ACP. Determine which of these may be threatened by the spill and direct the response operation to these locations. Initiate protection and recovery actions.	

Request local authorities (USCG, Port Authority, etc.) to establish traffic control in the area, as the situation demands.	
Inform local operators such as utilities, telephone company, railway, as necessary.	
Complete follow-up and written reporting, as the situation demands.	

2.1.1 Spill Detection and Mitigation Procedures

APPENDIX D.3 for spill detection protocols.

Each spill mitigation situation is unique and must be treated according to the circumstance present. In every situation, however, personnel safety must be assessed as the first priority. The potential for ignition and/or toxic exposure must be promptly evaluated. Spill mitigation procedures are listed in FIGURE 2.1-2. Worst case discharge volume calculations and discussion are provided in **APPENDIX D.**

FIGURE 2.1-2 - SPILL MITIGATION PROCEDURES

TYPE	MITIGATION PROCEDURE
Failure of Transfer Equipment	1. Personnel safety is the first priority. Evacuate nonessential personnel or personnel at high risk. 2. Terminate transfer operations and close all affected 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 or not)	1. Personnel safety is the first priority. Evacuate nonessential personnel or personnel at high risk. 2. Shut down pumps. Close the closest valves on each side of the rupture. 3. Drain the line back into contained areas (if possible). Alert nearby personnel of potential safety hazards. 4. Shut down source of vapor cloud ignition by shutting down all engines and motors.

	5. If piping is leaking and under pressure, then relieve pressure by draining into a containment area or back to a tank (if possible). Then repair line according to established procedures.
Fire/Explosion	1. Personnel safety is the first priority. Evacuate nonessential personnel or personnel at risk of injury. 2. Notify local fire and police departments. 3. Attempt to extinguish fire if it is in incipient (early) stage. 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 by 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).

2.1.2 Spill Surveillance Guidelines

- Surveillance of an oil spill should begin as soon as possible following discovery to enable response personnel to assess spill size, movement, and potential impact locations.
- The Company utilizes USCG classified OSROs to address aerial surveillance. Spill surveillance is best accomplished through the use of helicopters or small planes; helicopters are preferred due to their superior visibility and maneuverability.
- Dispatch observers to crossings downstream or down gradient to determine the spills maximum reach. Surveillance is also required during spill response operations to gauge the effectiveness of response operations; to assist in locating skimmers; and assess the spill's size, movement, and impact.

Field Surveillance Equipment

- 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.
    - 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.

- If fixed-wing planes are to be used, high-wing types provide better visibility than low-wing types.

Field Observations

- An Oil Spill Surveillance Checklist is provided in **FIGURE 2.1-3**.
- 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.
- 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.

FIGURE 2.1-3 - OIL SPILL SURVEILLANCE CHECKLIST

Record your observations of spilled oil either in a notebook or directly on an area chart. This checklist is an aid for organizing your observations. File used forms copies with the local area office to retain for a minimum of five years. Incident observation form originals MUST be maintained with the incident/response files. Retention time will be determined by Incident Legal Officer.

General Information	
Date:	Tidal or river stage (flood, ebb, slack, low water):
Time:	On-scene weather (wind, sea state, visibility):
Incident name:	Platform (helicopter, fixed-wing aircraft, boat):
Observer's name:	Flight path/trackline:
Observer's affiliation:	Altitude where observation taken:
Location of source (if known):	Areas not observed (i.e., foggy locations, restricted air spaces, shallow water areas):
Oil Observations	
Slick location(s):	Color and appearance (i.e., rainbow, dull or silver sheen, black or brown in color or mousse):
Slick dimensions:	Percent coverage:
Orientation of slick(s):	Is oil recoverable (Y/N)?:

Distribution of oil (i.e., windrows, streamers, pancakes or patches):	

Considerations
• During surveillance flights, travel beyond known impacted areas to check for additional oil spill sites • Include the name and phone number of the person making the observations • Clearly describe the locations where oil is observed and the areas where no oil has been seen

Other Observations

Response Operations
Equipment deployment (general locations where equipment is working and whether they are working in the heaviest concentration of oil):
Boom deployment (general locations of boom, whether the boom contains oil, and whether the oil entrains under the boom):

Environmental Observations
Locations of convergence lines, terrain, and sediment plumes:
Locations of debris and other features that could be mistaken for oil:
Wildlife present in area (locations and approximate numbers):

2.1.3 Spill Volume Estimating

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

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

Some rapid methods to estimate spill size are:

- **Transfer operations:** Multiply the pumping rate by the elapsed time that the leak was in progress, plus the drainage volume of the line between the two closest valves or isolation points **(volume loss = pump rate [bbls/min] x elapsed time [min] + line contents [bbl]).**

- **Tank overfills:** Elapsed time multiplied by the pumping rate.

- Visual assessment of the surface area and thickness (**FIGURE 2.1-4**); the method may yield unreliable results because:

    - Interpretation of sheen color varies with different observers,
    - Appearance of a slick varies depending upon amount of available sunlight, sea-state, and viewing angle, and
    - Different products may behave differently, depending upon their properties.

FIGURE 2.1-4 - SPILL ESTIMATION FACTORS

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

2.1.4 Estimating Spill Trajectories

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

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

- Oil moves at approximately the same direction and speed as the water currents, unless the winds are strong.

- Wind speed can be multiplied by 0.034 to determine the effect of winds on speed and direction of spill movement.

- The combined effects of winds and currents can be added to estimate spill movement speed and direction.

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

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

2.1.5 Initial Containment Actions

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

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

Selection of the appropriate location and method will depend upon:

- Length of time spill occurs before being noticed,
- Amount of spill,
- Area of coverage,
- Environmental factors, such as wind speed and direction, and
- Oil's characteristics.

2.1.6 Safety Considerations

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

2.2 FIRE / EXPLOSION / VAPOR RELEASE

2.2.1 Fire, Explosion, and Vapor Release Response Actions

SPECIFIC RESPONSE ACTIONS	COMMENT
FIRE / EXPLOSION	
1. Discontinue all tasks in progress (hot work, truck loading, maintenance, etc.)	
2. Sound local fire alarm, if available.	
3. Attempt to extinguish incipient stage fires, if trained to do so.	
4. Ensure 911 or local ER number was called to activate Fire and EMS support.	
Report the condition to Management and take further defensive actions as instructed.	
5. Report the Situation to QI/Management and ensure other internal/external notifications are in progress, as appropriate.	
6. Evacuate personnel to designated assembly areas and Account for personnel (roll call). Communicate any missing personnel (with potential last location) to the Fire Department.	
7. Emergency shutdown systems and/or manually (from a safe distance) isolate fuel sources and shut down engines and heaters.	
8. Ensure Asset emergency response plans have been activated. Ie: Facility Response Plan Security Plan	
9. Establish a secure perimeter around the area to prevent unauthorized entry per asset security plan (**SECTION 5**).	
10. Liaison with Fire Department to continue tactical measures to contain the fire;	
11. Recognize fire conditions which present BLEVE hazards and protect personnel and the public appropriately. (**SECTION 2.2.3**). Communicate potential bleve hazards to Fire Department.	
12. Contain spilled material and runoff. Dike far ahead of the release, as necessary.	

13. Conduct post-incident activities (**SECTION 8**).	
14. Ensure all incident/response documentation is compiled and filed.	
VAPOR RELEASE	
Report the release to Terminal Manager/Team Lead/QI.	
Sound the facility alarm.	
Do not assume vapors or gases are harmless because of lack of odor - **Harmful vapors or gases may be odorless.**	

2.2.1 Fire, Explosion, and Vapor Release Response Actions, Continued

SPECIFIC RESPONSE ACTIONS	COMMENT
VAPOR RELEASE, CONTINUED	
Evacuate personnel from the immediate area to the designated assembly area or to a location upwind of the release.	
Account for personnel using roll call.	
Engage emergency shutdown systems and/or manually isolate release from a safe distance.	
Isolate all sources of potential ignition.	
Establish a secure perimeter around the area to prevent unauthorized entry using Security Plan.	
Complete internal and external notifications, as appropriate.	
Assess the threat to the public and notify public officials as appropriate.	
Liaison with local Emergency Responders (Fire, Police) to evacuate surrounding homes, businesses, etc. Potentially impacted by vapor cloud.	
Conduct post-incident activities (**SECTION 8**).	
Ensure all incident/response documentation is compiled and filed.	

2.2.2 BLEVE - Boiling Liquid Expanding Vapor Explosion

BLEVE occurs when:

- Sealed containers of liquefied gases are accidentally exposed and enveloped by fire.
- Vapor is generated and internal pressure rapidly rises.
- The container wall temperature rises in the outage or unfilled area.
- Wall strength deteriorates and the stress applied by the increased pressure exceeds the

reduced strength of the wall.
- The container ruptures and super-heated liquid is released, expands and vaporizes in seconds resulting in catastrophic damage from the spread of ignited vapors. The ruptured vessel or tank could propel dangerous shrapnel significant distances. It is important that:
  - Vessels or tanks are kept cool and
  - External fires are extinguished quickly.

Fire Fighters should do the following:

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

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

2.3 MEDICAL EMERGENCY / PERSONAL INJURY

2.3.1 Medical Emergency / Personal Injury Checklist

SPECIFIC RESPONSE ACTIONS	COMMENT
General	
Medical emergencies may involve and/or be categorized as follows: a. **First Aid** - One or more patients with minor injuries which can be effectively managed with the application of routine First Aid. This type of injury does not require medical transport to a hospital, but may require follow-up with a Physician. b. **Serious** - One or more patients with moderate to serious injuries, requiring response by local Emergency Medical Services (EMS) and may include transport to a hospital for advanced care and treatment. c. **Life-Threatening** - One or more patients with serious or life-threatening injuries, requiring response by local Emergency Medical Services (EMS) and includes transport to a hospital for advanced care and treatment.	
Assess the scene.	
Summon local Emergency Medical Services (EMS) to the scene; provide information on the nature of injuries and number of injured persons (**SECTION 3**).	

If trained, provide First Aid/CPR as necessary, until EMS arrives at the scene; injured personnel should not be moved unless the situation is life threatening.	
Assist with Medical Evacuation (via air or ground transport) as recommended by EMS personnel.	
Establish a secure perimeter around the area to prevent unauthorized entry. Initiate the Site Security Plan, as necessary (**SECTION 5**).	
Notify Team Leader/Terminal Manager and make appropriate notifications to local emergency agencies if necessary. Make other internal management contacts as appropriate (**SECTION 3**).	
In case of a fatality: • Do not move the victim. • Do not release name of victim(s). • Contact local law enforcement. • Contact local medical authority. • Preserve the accident site. • Restrict all communications concerning the incident (do not release names of victims unless authorized).	
Conduct post-incident activities (**SECTION 8**).	
Ensure all incident/response documentation is compiled and filed.	

2.4 NATURAL DISASTER / SEVERE WEATHER

2.4.1 Earthquake/Tornado Procedure

SPECIFIC RESPONSE ACTIONS	COMMENT
1. Activate the emergency alarm, if available.	
2. Evacuate personnel from the immediate area to a safe assembly area. Determine safe location based on impact to facility.	
3. Account for personnel using roll call.	
4. Evaluate the extent of the emergency.	
5. If time permits, engage emergency shutdown systems and/or manually isolate processes and equipment.	
6. Notify the Team Leader/Terminal Manager and make other internal notifications, as appropriate. (**SECTION 3**)	
7. Conduct an inspection for residual safety hazards, such as: • Process safety/integrity;	

• Structural damage; • Downed power lines; and • Leaking natural gas, water, and sewer lines.	
8. Arrange for necessary repairs.	
9. Conduct post-incident activities. (**SECTION 8**)	
10. Ensure all incident/response documentation is compiled and filed.	

2.4.2 Flooding Procedure

SPECIFIC RESPONSE ACTIONS	COMMENT
1. Account for personnel.	
2. Notify Manager and make other internal notifications, as appropriate. (**SECTION 3**)	
3. Evaluate the extent of the emergency.	
4. Prepare an evacuation plan based upon flood crest and weather forecast.	
5. Maintain tank levels, as appropriate (consider filling tanks that might float with water).	
6. Secure all loose items in the area that could do harm to other equipment (pipe, tools).	
7. Engage emergency shutdown systems and/or manually isolate processes and equipment, if necessary.	
8. Evacuate personnel, as necessary. Conduct Accountability via roll call.	
9. Conduct an inspection for residual safety hazards, such as: • Structural damage; • Downed power lines; • Leaking natural gas, water, and sewer lines; • Poisonous snakes and other wildlife sheltering in structures, vehicles, and furniture; and • Avoid direct contact with flood water, mud, and animal carcasses.	

10. Arrange for necessary repairs.	
11. Conduct post-incident activities. (**SECTION 8**)	
12. Ensure all incident/response documentation is compiled and filed.	

2.4.3 Hurricane Procedure

SPECIFIC RESPONSE ACTIONS	COMMENT
Prior to Hurricane Season	
1. Conduct hurricane awareness training, which includes evacuation routes and asset hurricane procedures.	
2. Coordinate activities with local and state agencies involved in hurricane preparation (Emergency Access Cards, etc.).	
3. Communicate recommended Community Evacuation routes.	
4. Determine disposition of Company vehicles during evacuation.	
5. Each location should maintain current photographs of facilities.	
June 1st to November of Hurricane Season	
1. Verify the availability of and procure emergency supplies, as necessary: • Portable radios • Plywood, lumber, plastic sheeting, or covering • Drinking water • First Aid Kits • Flashlight and batteries • Tools • Emergency non-perishable food item	
2. Ensure emergency generators and portable equipment is in good working order and sufficient fuel is available.	
Hurricane entering Gulf of Mexico or Approaching East Coast	
1. Implement hurricane procedures.	
2. Identify employees who may volunteer to implement hurricane procedures.	

72 hours prior to hurricane's eye reaching landfall	
1. Cancel all training and meetings requiring travel to affected areas.	
2. Designate location for temporary Communication Center.	
3. Verify contractor contacts and availability.	
4. All employees shall provide to their supervisor an evacuation location and contact number.	
5. Each location shall identify a radio frequency which broadcasts emergency weather information.	
6. Report facility status to Corporate Management.	

2.4.3 Hurricane Procedure, Continued

SPECIFIC RESPONSE ACTIONS	COMMENT
48 hours prior to hurricane's eye reaching landfall	
1. Implement flex-shift to allow employees to secure personal property.	
2. Ensure all storage tanks are stabilized.	
3. Ensure all below ground sumps have been pumped dry.	
4. Secure all critical documents including electronic data.	
5. Elevate electrical equipment, sensitive office equipment and documents in the event of high water.	
6. Report facility status to Corporate Management.	
36 hours prior to hurricane's eye reaching landfall	
1. Communicate with suppliers and affected customers.	
2. Report facility status to Corporate Management.	
24 hours prior to hurricane's eye reaching landfall	
1. Begin shutdown operations.	
2. Release non-essential personnel.	

3. Report facility status to Corporate Management.	
12 hours prior to hurricane's eye reaching landfall	
1. Man Communications Center continuously.	
2. Report facility status to Corporate Management.	
Post Storm Recovery Procedure	
1. Initiate facility damage assessment.	
2. Report facility status to Corporate Management.	
3. Once access has been granted, the following processes should be surveyed for operational reliability prior to startup: • Electrical panels and motors, • Instrument air system, • Emergency Shutdown System, • Tank and Vessel foundation and support (possible washouts), and • Check for dangerous wildlife and reptiles.	

2.5 SECURITY RELATED INCIDENTS

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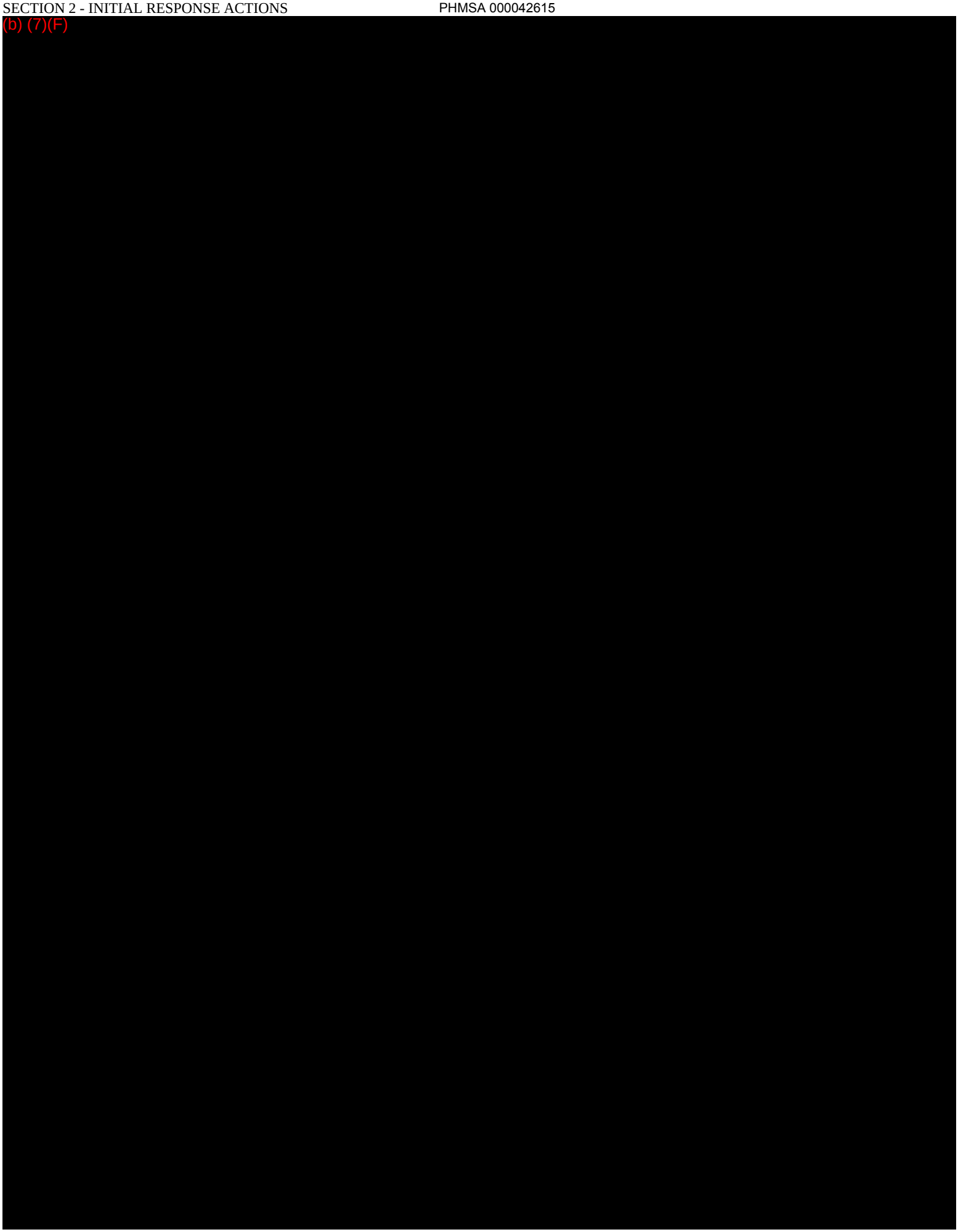

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c. Issue instructions to carry out a search of all Evacuation Routes and Muster Points. d. Issue instructions to the Incident Response Team to be prepared to immediately isolate any area found to contain a suspicious object by roping it off, erecting signs, and posting a watch. e. Notify nearby facilities and installations, if necessary.	

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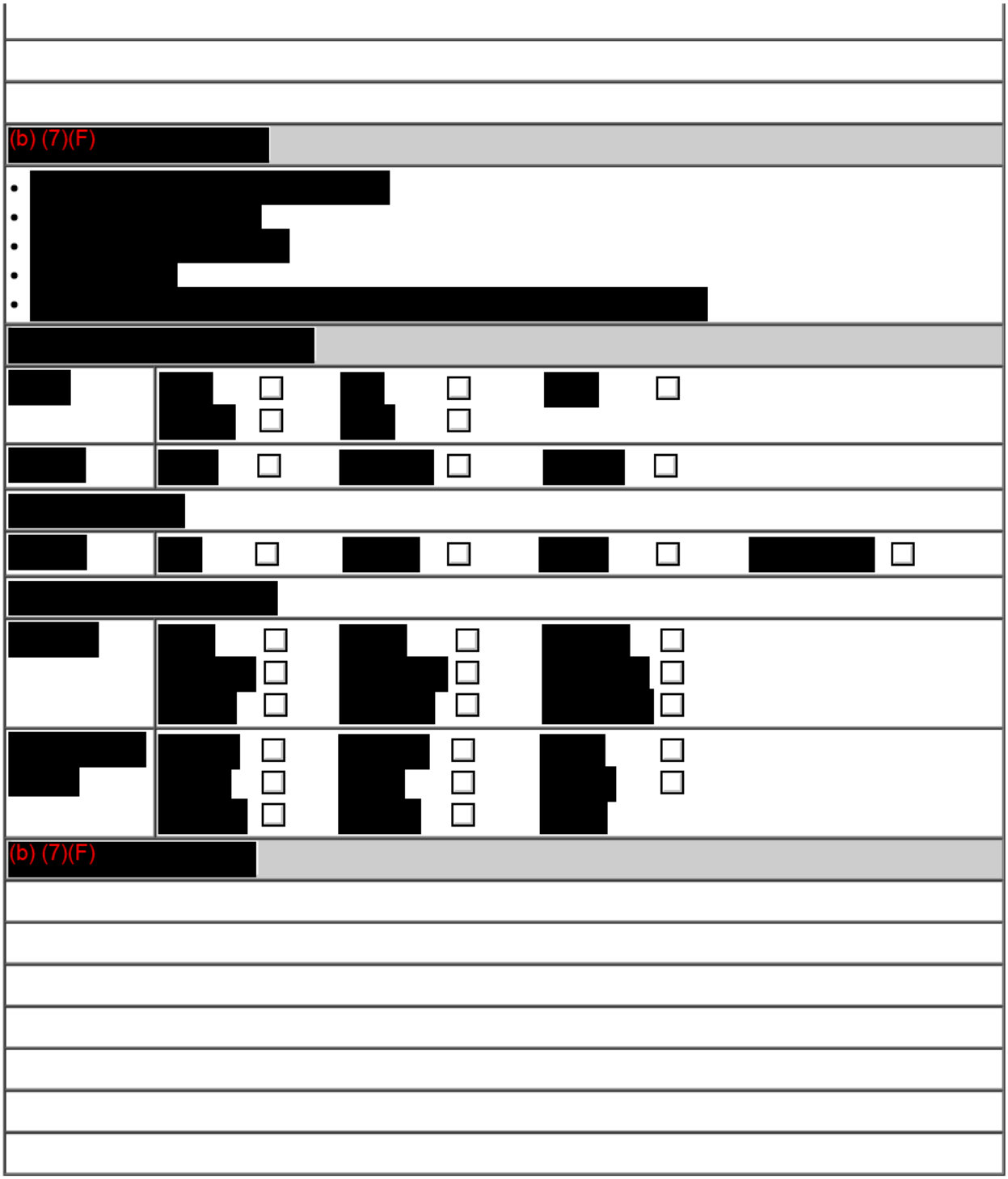


2.6 EVACUATION

2.6.1 Evacuation Checklist

SPECIFIC RESPONSE ACTIONS	COMMENTS
Request assistance from off-site agencies; convey Command Post's location.	
Assemble personnel at predetermined safe location: upwind/up gradient of release (regrouping area).	

Account for Company and contractor personnel.	
Assess casualties (number/type/location).	
Determine probable location of missing personnel.	
Secure site, establish re-entry point and check-in/check-out procedures.	
Develop list of known hazards (confined spaces, electrical hazards, physical hazards, vapors, oxygen deficiency, fire/explosion, etc.).	
Monitor situation (weather, vapors, product migration) for significant changes.	
Assist in developing a Rescue Plan, if necessary.	

2.6.2 Evacuation Factors

EVACUATION FACTORS	
FACTOR	**DESCRIPTION**
Stored material location	• Located in oil storage area. • Identified in Facility Plot Plan. (**FIGURE 1-5**)
Spilled material hazards	• Hazard is fire/explosion.
Water currents, tides or wave conditions	• Data for tides and currents is from the National Oceanographic and Atmospheric Administration (NOAA) Station ID: 8531095 (Arthur Kills - Carteret - NJ). Arthur Kills sometimes referred to as Staten Island Sound is a tidal straight that connects Raritan Bay to the south with Newark Bay to the north separating Staten Island from mainland New Jersey. Because Arthur Kills is a tidal straight it can flow in either direction but generally has a north to south direction unless influenced by a weather tide event. The average tidal range is approximately 4.5 to 5.5 Feet from Mean Lower Low Water (MLLW) to high tide. The average tidal current is approximately 1.9 to 2.5 Knots. The data concerning tidal currents and direction flow is considered approximate as a result of previous tidal current predictions having been inaccurate as referenced by the United States Coast Pilot. The Coast Pilot states caution should be used to make visual observations of tidal current speeds due to insufficient knowledge of the hydrology of the Arthur Kills.
Evacuation routes	• Routes are summarized on Evacuation Plan Diagram. (**FIGURE C-3**) • Criteria for determining safest evacuation routes from facility may include: wind direction, potential exposure to toxins and carcinogens, intense heat, potential for explosion/fire, and blockage of planned route by fire, debris, or released liquid.

Alternate evacuation routes	• Refer to Evacuation Plan Diagram. (**FIGURE C-3**) • An alternate route off site is out the North gate. The secondary muster point is located just outside the North Gate, as shown on Figure C-3.
Injured personnel transportation	• Emergency services will be mobilized to the Facility. (**FIGURE 3.1-4**.) • Hospital will be contacted and ambulance will used to transport critically injured personnel.

2.6.2 Evacuation Factors, Continued

EVACUATION FACTORS	
FACTOR	**DESCRIPTION**
Alarm/Notification system location	• Operations personnel should initially use "direct talk" cellular telephone communication to contact other facility personnel. • If this contact cannot be made, operations personnel should make contact by a brief tour of Terminal facilities, if this can be done without risk to personal safety. • All entrances and exits within the admin building and within the Terminal Operators' office. • Within the warehouse. • Within each kiosk at the load rack. • Emergency cut-off buttons are located at the Terminal. The Site Plan diagram shows the locations of these cut-off switches. Activating the cut-off/shut-off buttons stops product flow from the bulk fuel tanks. • Additionally security at the gasoline/diesel loading rack includes the fire control system that consists of a heat senor foam system which, if activated, will disable all loading operations at loading rack. • Refer to **FIGURE 2-1** for a description of warning alarms at the Facility.
Community evacuation plans	• Company may request local police assistance (see **FIGURE 3.1-4** for notification information). Community evacuations are the responsibility of these agencies. • The community evacuation plan for the facility area was not available for review.

2.6.2 Evacuation Factors, Continued

EVACUATION FACTORS	
FACTOR	**DESCRIPTION**
Spill flow direction	• The terminal yard (encompassing the area around the office, truck loading rack, etc.) and diked areas are relatively level and graded to direct runoff and potential oil discharges with to the drainage system, where collected runoff flows through one or two oil/water separators (OWS 1 and OWS 3) prior to discharge. • An oil discharge may leave the property by the following ways: • - In a containment (diked) area, a discharge would be contained within the secondary containment, unless the secondary containment also fails. If secondary containment fails, a discharge from a bulk storage tanks would tend to flow eastward and enter streams that flow into Arthur Kill. • - A discharge in the undiked area northeast of Tank 18 and north of Tank 19 would flow directly into the state open waters and then southeast to Arthur Kill. • - A discharge in the undiked area along the southern side of the terminal (i.e., from dock lines and/or manifold) would flow to the east and/or north and enter the tidelands along the eastern side of the terminal and then southeast to Arthur Kill. • - A discharge in the undiked areas at the dock or along the dock lines between the dock and Industrial Avenue would flow to the south and enter Arthur Kill. • - In the terminal yard, a discharge flows to OWS 1, which discharges to the Settling Pond and OWS 3. Therefore, a discharge in the yard is unlikely to leave the property. • Identified in Facility Drainage Diagram. (**FIGURE C-2**)
Prevailing wind direction and speed	• The general prevailing wind direction is Southwest. • Because wind direction varies with weather conditions, consideration for evacuation routing will depend in part on wind direction.
Emergency personnel/response equipment arrival route	• The facility is accessible via Roosevelt Avenue • Directions to nearest medical facility provided below.

2.6.2 Evacuation Factors, Continued

EVACUATION FACTORS	
FACTOR	**DESCRIPTION**
Centralized check-in area (Personnel assembly area)	• Roosevelt Avenue Southwest side of terminal in the parking lot across the street • Supervisor/Senior employee is responsible for head count.
Mitigation Command Center location	• Holiday Inn (1000 Roosevelt Av., Carteret NJ 07008, 732-541-9500), or Radisson (30 Minue Street, Carteret NJ 07008, 732-541-2005) • Mobile Command Posts may be established as necessary.
Facility Shelter Location	• Holiday Inn (1000 Roosevelt Av., Carteret NJ 07008, 732-541-9500), or Radisson (30 Minue Street, Carteret NJ 07008, 732-541-2005) • Not a safe harbor from fires, explosions, vapor clouds, or other significant emergencies; however, may be used for temporary shelter from inclement weather.
Directions to nearest medical facility	Directions to Rahway Hospital: • Turn West on Roosevelt Ave., which turns into Randolph Ave, turn right on Hart St. to E. Hazelwood Ave turn left, continue on W. Hazelwood Ave. to Jefferson Ave. turn right go to Stone St. Which is location of Hospital.

2.7 FIRE PRE PLANS

Name:	Carteret
Address:	760 Roosevelt Avenue Carteret NJ 07008
Latitude / Longitude:	(b) (7) [redacted]
Phone / Fax:	(732) 541-5131 / (732) 541-9434
DESCRIPTION:	
The Carteret Terminal (hereinafter referred to as "Facility") is owned and operated by BP Products North America, Inc., U.S. Pipelines and Logistics. This is a complex facility and subject to EPA, US Coast Guard, and US Department of Transportation Pipeline and Hazardous Materials Safety Administration (USDOT PHMSA) regulatory requirements, as well as the State of New Jersey Discharge Prevention, Containment and Countermeasure (DPCC); Discharge Cleanup and Removal (DCR) regulations for major facilities (i.e., facilities with a combined storage capacity for 200,000 gallons or more for petroleum or petroleum products). This complex facility's SIC code is 1571 and NAICS code is 424710.	

The Facility is located in a mixed use (i.e., residential, commercial, and industrial) area of Carteret, New Jersey. The Facility is divided into two sections: 1) the upper, western portion (the Upper Facility) that includes the terminal offices, truck loading rack, and petroleum storage and 2) the lower, eastern portion (the Lower Facility or BP Dock) that includes the Facility-owned marine transfer facility. The Upper Facility is bordered by Peter J. Sica Industrial Highway to the northeast; New Jersey Turnpike entrance ramps to the northwest; Roosevelt Avenue to the west; commercial/industrial businesses to the south; and residences along Bristol Station Court to the southeast. The Lower Facility (the BP Dock) is on the eastern shore of the Arthur Kill, near the mouth of the Rahway River. The Lower Facility and part of the Upper Facility are located on a tidal marsh. (b) (7)(F)

(b) (7)(F)

There are no ASTs that are closed or out of service, but tanks that are not in use or decommissioned are marked permanently closed while tanks that are temporarily not in use are marked out of service. There are no buried tanks/bulk containers (i.e., underground storage tank, UST) at the Facility. The Facility receives denatured ethanol, gasoline, and distillates via marine vessels (i.e., ships and barges), pipelines, and trucks. Additives are typically received via tanker truck and drums and other portable container deliveries are received via truck. The Facility ships products out via truck, marine vessels, and pipeline. The facility conducts marine transfers of products to and from storage at the BP Dock located on Arthur Kill. In addition, marine vessels are fueled at the BP Dock.

(b) (7)(F)

DRIVING DIRECTIONS:

Directly off the NJ Turnpike exit 12. Take left off exit to site on the left.

DISTANCE / DIRECTION TO NAVIGABLE WATER:
The upper plant is approximately 1-2 miles from the Rahway River and the Lower Plant has a dock on the Arthur Kill. Approximately 15 miles to the Atlantic ocean.
EVACUATION:
The upper plant is approximately 1-2 miles from the Rahway River and the Lower Plant has a dock on the Arthur Kill. These bodies of water are located approximately 15 miles from the Atlantic ocean

2.7 FIRE PRE PLANS, CONTINUED

*24 Hour Number

Company Personnel		
Affiliation	**Phone Number**	**Time Contacted**
Jack Cowart Terminal Manager **Alternate Qualified Individual**	(732) 541-5131 x605 (Office), (732) 969-0143 (Fax) (Office) (724) 759-3560 *(Mobile)	
Julea Mitchell Area Operations Manager **Primary Qualified Individual**	(732) 541-5131 ext. 609 (Office) (732) 423-5037 *(Mobile)	
James Lutter Safety & Health Coordinator	(732) 541-5131 #611 (Office) (b) (6) (806) 632-3235 *(Mobile)	

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

2.7 FIRE PRE PLANS, CONTINUED

*24 Hour Number

Company Personnel		
Affiliation	**Phone Number**	**Time Contacted**
Carteret Terminal Security	(732) 522-1559 (Office)	
Peter Correia Supervisor	(732) 541-5131 x 603 (Office) (516) 341-9481 *(Mobile)	
Richard Stepnosky Operations Supervisor	(732) 541-5131 Ext. 603 (Office) (732) 718-5094 *(Mobile)	
Brian Whitaker Supervisor	(732) -541-5131 x 603 (Office) (732) 289-0830 *(Mobile)	

Stephen Zimenoff Supervisor	(732) 541-5131 x 603 (Office) (732) 522-2601 *(Mobile)	
Joseph Benson Operator	(732) 541-5131 x 608 (Office)	
Edmund Carter Operator	(732) 541-5131 x 608 (Office)	
Scott Chan Scheduler	(732) 541-5131 x 607 (Office)	
Ric Flores Operator	(732) 541-5131 x 608 (Office)	
Tim Jicha Operator	(732) 541-5131 x 608 (Office)	

NOTE: Refer to **APPENDIX A** for training dates.

2.7 FIRE PRE PLANS, CONTINUED

*24 Hour Number

Company Personnel		
Affiliation	**Phone Number**	**Time Contacted**
"Anne" Jin Wu Scheduler	(732) 541-5131 x 616 (Office) (917) 302-9696 *(Mobile)	
Mary Kurpell Admin Assist	(732) 541-5131 x 600 (Office)	
Charles McGee Operator	(732) 541-5131 x 608 (Office)	
Wayne Sroka Operator	(732) 541-5131 x 608 (Office)	
Wilson Tubie Operator	(732) 541-5131 x 608 (Office)	
James Viering Operator	(732) 541-5131 x 608 (Office)	
Anthony Williams Operator	(732) 541-5131 x 608 (Office)	
Scott Williams Operator	(732) 541-5131 x 608 (Office) (201) 741-0052 *(Mobile)	
Sean Wilson Operator	(732) 541-5131 x 608 (Office)	
Paula Skryja Emergency Response/Crisis	(708) 390-5521 (Office) (443) 310-2099 *(Mobile)	

Management Coordinator		

NOTE: Refer to **APPENDIX A** for training dates.

2.7 FIRE PRE PLANS, CONTINUED

*24 Hour Number

Company Personnel		
Affiliation	**Phone Number**	**Time Contacted**
Tyrone Mitchell Regional Operations Manager	(678) 837-3802 (Office) (b) (6) (409) 771-8255 *(Mobile)	
Robert J. Tworkowski Environmental Coordinator	(732) 541-5131 #619 (Office) (b) (6) (240) 461-0750 *(Mobile)	
Jeff Cordy Engineering & Maintenance	(540) 937-4514 or (540) 937-6211 (Office) (b) (6) (540) 729-5257 *(Mobile)	
Corporate Security	(630) 420-4400* (Office)	
Ronald Rybarczyk Government & Public Affairs Director (GPA)	(419) 698-6376 (Office) (b) (6) (816) 536-1328 *(Mobile)	
Neil Geary Government & Public Affairs (GPA)	(281) 504-8782 (Office) (281) 513-9727 *(Mobile)	
BP Notification Center (BPNC)	(800) 321-8642* (Office), (630) 961-6200 (Office), (630) 961-6965 (Fax) (Office)	

NOTE: Refer to **APPENDIX A** for training dates.

2.7 FIRE PRE PLANS, CONTINUED

*24 Hour Number

Emergency Response Contractors		
Affiliation	**Phone Number**	**Time Contacted**
Atlantic Response Inc.	(732) 969-8555	
Clean Harbors Cooperative	(908) 862-7500 (908) 862-7560 Fax	

Marine Spill Response Corporation (MSRC)	(800) 645-7745 or (800) 259-6772 (732) 417-0500 (800) 635-6772 Fax	

2.7 FIRE PRE PLANS, CONTINUED

*24 Hour Number

AFFILIATION	PHONE NUMBER	TIME CONTACTED
Initial		
Carteret Fire Department	911* (732) 541-4181	
Carteret Police Department	911* (732) 541-4181	
National Response Center (NRC) - NRC will contact the USCG and EPA completing the Federal notifications.	(800) 424-8802* (202) 267-2675* (202) 267-1322 Fax	
New Jersey Department of Environmental Protection	(877) WARN DEP (877) 927-6337	
Recommended		
Federal Agencies		
Army Corps of Engineers	(732) 846-5830	
Department of Transportation (DOT)	(202) 366-4000	
Occupational Safety and Health Administration (OSHA) - Washington, D.C.	(800) 321-6742*	
U.S. Coast Guard - Activities NY	(718) 354-4353	
U.S. Environmental Protection Agency Hotline/National Response Center	(800) 424-8802	
U.S. Fish and Wildlife Service, Trenton, NJ	(609) 214-7895	
State Agencies		
New Jersey SERC; State Office of Emergency Management, Regional Operations and Intelligence Center (ROIC)	(609) 963-6900	
New Jersey State Fire Marshall	(609) 633-6106	
New Jersey State Police	(973) 578-8173	
New York Department of Environmental Conservation (DEC)	(800) 457-7362* Spill Notification	

	(518) 457-7362	
Local Agencies		
Board of Health	(732) 541-3890	

2.7 FIRE PRE PLANS, CONTINUED

*24 Hour Number

AFFILIATION	PHONE NUMBER	TIME CONTACTED
Recommended		
Local Agencies		
Civil Defense	732-541-4007	
Local Emergency Planning Committee (LEPC)	(732) 541-4007	
Water & Sewage System	(732) 541-3875	
Emergency Medical Services		
Ambulance	911* (732) 541-4181	
American Red Cross	(800) 448-3543	
Rahway Hospital	(732) 381-4200	
Raritan Bay Medical Center	(732) 442-3700	
USCG Classified OSRO's		
Atlantic Response Inc. Carteret, NJ	(732) 969-8555	
Clean Harbors Cooperative Linden, NJ	(908) 862-7500 (908) 862-7560 Fax	
Marine Spill Response Corporation (MSRC) Edison, NJ	(800) 645-7745 or (800) 259-6772 (732) 417-0500 (800) 635-6772 Fax	
Neighboring Facilities		
Arthur Kill LLC - Arthur Kill Generating Station	(718) 390-2734	
ICL Performance Products LP - Carteret, NJ Plant	(732) 570-2027*	
Kinder Morgan	(732) 541-5161*	
Radio Stations		
WCBS News	(212) 975-8988	
Service Providers (as needed)		
Auchter Ind. Services	(908) 862-2277	

2.7 FIRE PRE PLANS, CONTINUED

*24 Hour Number

AFFILIATION	PHONE NUMBER	TIME CONTACTED
Recommended		
Service Providers (as needed)		
Buckeye P/L	(908) 862-6060*	
CHEMTREC - Washington, D.C.	(800) 424-9300	
Colonial P/L	(732) 750-0727*	
Ferrara Electric	(646) 208-3072	
Fuels Technology, Warrenville, IL	(630) 845-4500 (630) 845-4501 FAX	
Natural Resources Damage Assessment (NRDA) - Washington State, Attn: Gary Mauseth	(425) 823-4841 (206) 954-9648	
Television Stations		
WNET	(973) 643-3315	
Transport Companies		
CSX Railroad (Suspend Train Operations)	(800) 232-0144*	
Waste Management		
Chemtron Corp. - Avon, OH	(440) 933-6348	
Heritage Environmental Services LLCKansas City, MO	(816) 453-4321 (866) 436-8778 (816) 753-0180 Fax	
WasteTrak (List of approved disposal sites): https://www.wastetrak.com/security/login.asp. BP Terminal Mangers and ECs have the required login information.		
Weather		
National Weather Service (Recorded Forecasts)	(609) 261-6600	
Wildlife Rehabilitation		
TRI-State (Wildlife clean-up & Rehabilitation) - Delaware	(800) 710-0695 Pager (800) 710-0696 Pager (302) 737-7241 Office	

2.7 FIRE PRE PLANS, CONTINUED

Area Firefighting Resources			
Company	Phone	Equipment	Response

	Number		Time
Carteret Fire Department Carteret, NJ	732-541-4387	2000gpm 93ft. Aerial w/ dual nozzle platform 2000gpm 750gal. Fire/rescue pumper 1500gpm 750gal. Pumper (drafting capability) 1500gpm 750gal. Reserve pumper 1250gpm 500gal./water 1000gal./foam Pumper carrying Universal Gold AR-AFFF 1%-3% foam with 800 gal in reserve All apparatus large diameter hose have 5" Storz connections, and all smaller hoses have NST (2.5" and 1.5") connections. Crew size varies from 3 - 8 personnel on shift 24hrs, which may also be supplemented with any of the 22 volunteers. All firefighters both paid and volunteer are required to meet NJ Firefighter I competencies which includes a standard on responding to and suppression of hydrocarbon fires. Of the full-time firefighters, four are hazardous materials technician trained, and all other sworn members of the Carteret FD are trained to the hazardous materials operations level. Hazardous materials' training is in compliance with OSHA 29 CFR 1910.120(q) and NFPA 472.	0.083
Williams Fire and Hazard Control Mauriceville, TX	(409) 727-2347 (281) 999-0276	Williams specializes in petroleum and tank farm fire fighting and as a fire equipment / foam vendor has access to a large amount of foam and the equipment needed to deliver it to the tank surface.	24 Hours

2.7 FIRE PRE PLANS, CONTINUED

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

SECTION 3 Last Revised: November 2012

NOTIFICATIONS / TELEPHONE NUMBERS

3.1 EMERGENCY INFORMATION AND NOTIFICATION PROCEDURES

Semi-annually, call agencies and oil spill response contractors (OSROs) listed in External Notifications and Telephone Numbers of Facility Response Plan, to verify phone numbers are current.

The notification sequence for a spill is as follows:

- Facility personnel will identify and control the source of a spill, if safe to do so, then will notify the Supervisory Personnel.
- The Qualified Individual will conduct notifications as illustrated in the Emergency Notification Flow Chart (**FIGURE 3.1-1**).

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

This section also contains the following:

- FIGURE 3.1-2 provides a notification summary and documentation form to assist in documenting notifications.
- FIGURE 3.1-3 provides the Internal Notifications and Telephone Numbers list.
- FIGURE 3.1-4 provides the External Notifications and Telephone Numbers list.

FIGURE 3.1-1 - EMERGENCY NOTIFICATION FLOW CHART

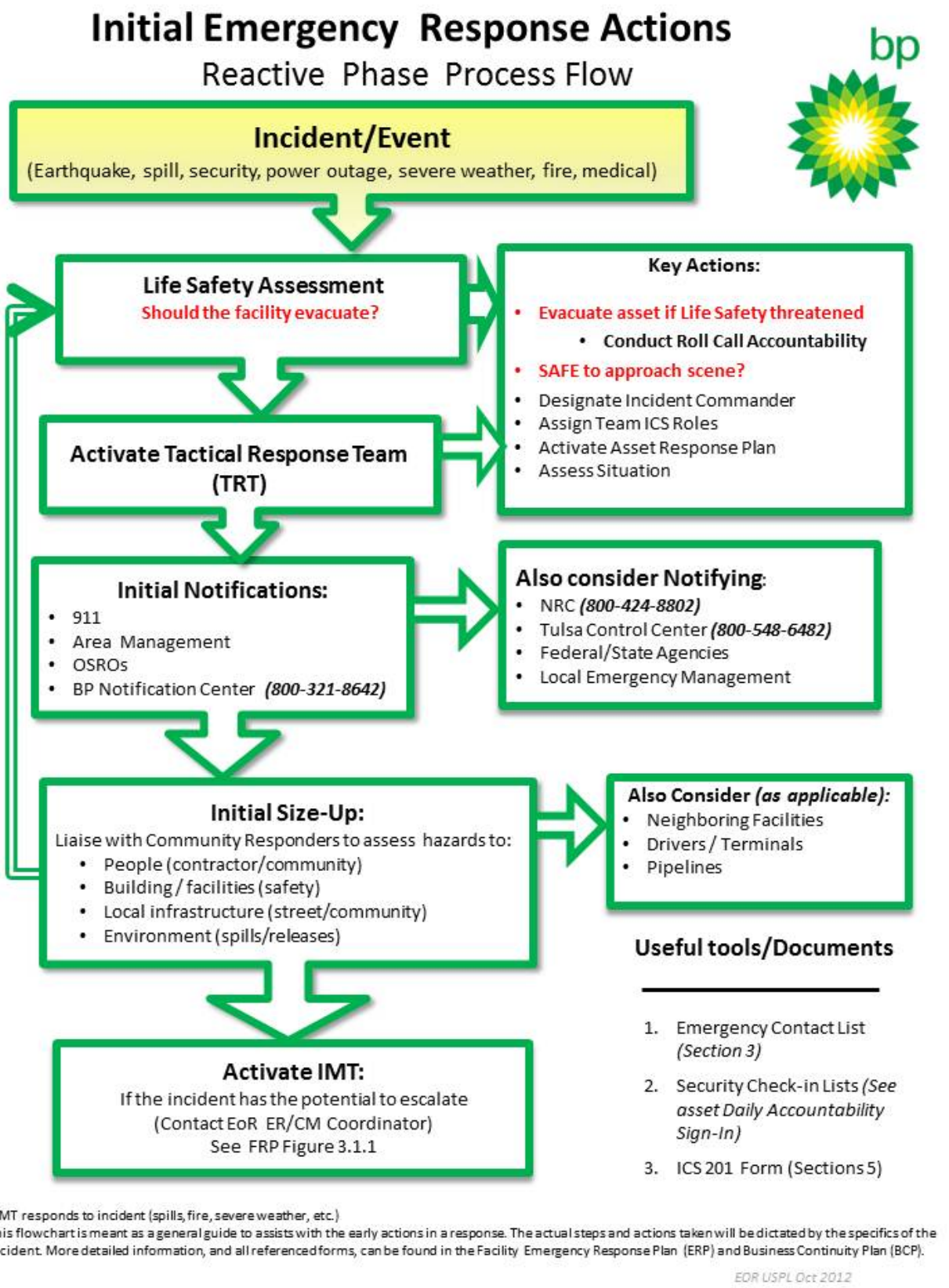


FIGURE 3.1-2 - RELEASE / DISCHARGE / INCIDENT TELEPHONIC NOTICE

Do not delay making notifications while obtaining the information and completing this form.

INVOLVED PARTIES			
Reporting Party		**Suspected Responsible Party**	
Name:		Name:	
Phone:	(Day)	Phone:	(Day)
	(Evening)		(Evening)
Position:		Company:	
Company:		Organizational Type: ☐ Private Citizen ☐ Private Enterprise ☐ Public Utility ☐ Local Government ☐ State Government ☐ Federal Government	
Address:			
Person Discovering Incident			
Name:			
Company/Organization:			
City: State: Zip:			
Were materials released/discharged? ☐ Yes ☐ No		Calling for Responsible Party ☐ Yes ☐ No	

INCIDENT DESCRIPTION		
Start Date:	Time: ☐ AM ☐ PM	Weather:
End Date:	Time: ☐ AM ☐ PM	Latitude: _____ degrees _____ min _____ sec N
		Longitude: _____ degrees _____ min _____ sec W
Mile Post/River Marker:		
City/County:		Distance from City:
State:		Direction from City:
Source and Cause of Incident:		
Storage Tank Type: ☐ Above Ground ☐ Below Ground ☐ Unknown		
Tank Capacity:		Facility Capacity:

MATERIAL INFORMATION

CHRIS Code	Product Released / Discharged	Released / Discharged Quantity (Include units of measure)	Quantity in Water (Include units of measure)

FIGURE 3.1-2 - RELEASE / DISCHARGE / INCIDENT TELEPHONIC NOTICE, CONTINUED

INITIAL IMPACT	
Number of Injuries:	Number of Deaths:
Were there Evacuations? ☐ Yes ☐ No	Number Evacuated:
Was there any Damage? ☐ Yes ☐ No	
Damage in dollars (estimate):	
Is the Release / Discharge Contained within the boundaries of the facility? ☐ Yes ☐ No	
Direction of Flow:	

RESPONSE ACTION(S)
Action(s) Taken to Correct, Control or Mitigate Incident:

ADDITIONAL INFORMATION
Any information about the incident not recorded elsewhere in the report (e.g., duration of incident; if incident is continuing, intermittent, or terminated; treatment or disposal measures).

COMPLETED NOTIFICATIONS

Report	Phone Number	Date	Case Number	Time	Name	Title
NRC ☐	(800) 424-8802*					

FIGURE 3.1-3 - INTERNAL NOTIFICATIONS AND TELEPHONE NUMBERS

*24 Hour Number
The Qualified Individual (QI) and Alternate QI have been granted the authority, including contracting authority, to implement the Facility Response Plan. Terminal personnel comprise the Facility Tactical Response Team (FTRT). The Initial FTRT will consist of the Terminal personnel on-duty at the time of an incident.

FACILITY TACTICAL RESPONSE TEAM						
NAME/TITLE	**PHONE NUMBER**	**RESPONSE TIME (hours)**	**ICS POSITION**	**RESPONSE TRAINING TYPE[1]**		
				1	**2**	**3**
Jack Cowart Terminal Manager **Alternate Qualified Individual**	(732) 541-5131 x605 (Office), (732) 969-0143 (Fax) (Office) (724) 759-3560 *(Mobile)	1	Alternate Incident Commander	x	x	x
Julea Mitchell Area Operations Manager **Primary Qualified Individual**	(732) 541-5131 ext. 609 (Office) (732) 423-5037 *(Mobile)	1	Alternate Incident Commander / Command Staff Support	x	x	x
James Lutter Safety & Health Coordinator	(732) 541-5131 #611 (Office) (b) (6) [redacted] (806) 632-3235 *(Mobile)	2	Safety Officer, Site Safety Officer	x	x	x

EMERGENCY RESPONSE TRAINING TYPE[1]	
There are three different types of training described below including HAZWOPER, OPA, 90 / ICS, and Qualified Individual Training. An "x" has been placed in the applicable columns (type 1, 2, or 3) in the table above for the type of training completed by each individual. Blank spaces indicate training has not been completed.	
TYPE[1]	**DESCRIPTION** (All training completed on an annual basis.)
1	29 CFR 1910.120 HAZWOPER
2	OPA 90 (Training Reference for Oil Spill Response) and ICS

3	Qualified Individual Training

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

FIGURE 3.1-3 - INTERNAL NOTIFICATIONS AND TELEPHONE NUMBERS, CONTINUED

*24 Hour Number

EMERGENCY RESPONSE PERSONNEL AND BUSINESS UNIT NOTIFICATIONS						
NAME/TITLE	**PHONE NUMBER**	**RESPONSE TIME (hours)**	**ICS POSITION**	**RESPONSE TRAINING TYPE[1]**		
				1	**2**	**3**
Carteret Terminal Security	(732) 522-1559 (Office)	1	Operations Support	x	x	
Peter Correia Supervisor	(732) 541-5131 x 603 (Office) (516) 341-9481 *(Mobile)	1	Operations/Planning Support	x	x	
Richard Stepnosky Operations Supervisor	(732) 541-5131 Ext. 603 (Office) (732) 718-5094 *(Mobile)	1	Operations/Planning Support	x	x	
Brian Whitaker Supervisor	(732) -541-5131 x 603 (Office) (732) 289-0830 *(Mobile)	1	Operations/Planning Support	x	x	
Stephen Zimenoff Supervisor	(732) 541-5131 x 603 (Office) (732) 522-2601 *(Mobile)	1	Operations/Planning Support	x	x	
Joseph Benson Operator	(732) 541-5131 x 608 (Office)	1	Operations/Planning Support	x	x	
Edmund Carter Operator	(732) 541-5131 x 608 (Office)	1	Operations/Planning Support	x	x	
Scott Chan Scheduler	(732) 541-5131 x 607 (Office)	1	Operations/Planning Support	x	x	
Ric Flores Operator	(732) 541-5131 x 608 (Office)	1	Operations/Planning Support	x	x	

Tim Jicha Operator	(732) 541-5131 x 608 (Office)	1	Operations/Planning Support	x	x	

EMERGENCY RESPONSE TRAINING TYPE[1]
There are three different types of training described below including HAZWOPER, OPA, 90 / ICS, and Qualified Individual Training. An "x" has been placed in the applicable columns (type 1, 2, or 3) in the table above for the type of training completed by each individual. Blank spaces indicate training has not been completed.

TYPE[1]	**DESCRIPTION** (All training completed on an annual basis.)
1	29 CFR 1910.120 HAZWOPER
2	OPA 90 (training Reference for Oil Spill Response) and ICS
3	Qualified Individual Training

NOTE: Refer to **APPENDIX A**, **FIGURE A.2-3** for training dates.

FIGURE 3.1-3 - INTERNAL NOTIFICATIONS AND TELEPHONE NUMBERS, CONTINUED

*24 Hour Number

EMERGENCY RESPONSE PERSONNEL AND BUSINESS UNIT NOTIFICATIONS						
NAME/TITLE	**PHONE NUMBER**	**RESPONSE TIME (hours)**	**ICS POSITION**	**RESPONSE TRAINING TYPE[1]**		
				1	**2**	**3**
"Anne" Jin Wu Scheduler	(732) 541-5131 x 616 (Office) (917) 302-9696 *(Mobile)	1	Operations/Planning Support	x	x	
Mary Kurpell Admin Assist	(732) 541-5131 x 600 (Office)	1	Logistics Support	x	x	
Charles McGee Operator	(732) 541-5131 x 608 (Office)	1	Operations/Planning Support	x	x	
Wayne Sroka Operator	(732) 541-5131 x 608 (Office)	1	Operations/Planning Support	x	x	
Wilson Tubie Operator	(732) 541-5131 x 608 (Office)	1	Operations/Planning Support	x	x	
James Viering Operator	(732) 541-5131 x 608 (Office)	1	Operations/Planning Support	x	x	

Anthony Williams Operator	(732) 541-5131 x 608 (Office)	1	Operations/Planning Support	x	x	
Scott Williams Operator	(732) 541-5131 x 608 (Office) (201) 741-0052 *(Mobile)	1	Operations/Planning Support	x	x	
Sean Wilson Operator	(732) 541-5131 x 608 (Office)	1	Operations/Planning Support	x	x	
Paula Skryja Emergency Response/Crisis Management Coordinator	(708) 390-5521 (Office) (443) 310-2099 *(Mobile)	4-6	Crisis Management Advisor	x	x	x

EMERGENCY RESPONSE TRAINING TYPE[1]

There are three different types of training described below including HAZWOPER, OPA, 90 / ICS, and Qualified Individual Training. An "x" has been placed in the applicable columns (type 1, 2, or 3) in the table above for the type of training completed by each individual. Blank spaces indicate training has not been completed.

TYPE[1]	DESCRIPTION (All training completed on an annual basis.)
1	29 CFR 1910.120 HAZWOPER
2	OPA 90 (training Reference for Oil Spill Response) and ICS
3	Qualified Individual Training

NOTE: Refer to **APPENDIX A**, **FIGURE A.2-3** for training dates.

FIGURE 3.1-3 - INTERNAL NOTIFICATIONS AND TELEPHONE NUMBERS, CONTINUED

*24 Hour Number

EMERGENCY RESPONSE PERSONNEL AND BUSINESS UNIT NOTIFICATIONS

NAME/TITLE	PHONE NUMBER	RESPONSE TIME (hours)	ICS POSITION	RESPONSE TRAINING TYPE[1]		
				1	2	3
Tyrone Mitchell Regional Operations Manager	(678) 837-3802 (Office) (b) (6) [redacted] (409) 771-8255 *(Mobile)	4-6	Liaison Officer	x	x	
Robert J.	(732) 541-5131 #619 (Office)					

Tworkowski Environmental Coordinator	(b) (6) [redacted] (240) 461-0750 *(Mobile)	4-6	Environmental Unit Leader	x	x	x
Jeff Cordy Engineering & Maintenance	(540) 937-4514 or (540) 937-6211 (Office) (b) (6) [redacted] (540) 729-5257 *(Mobile)	4-6	Planning Support			
Corporate Security	(630) 420-4400* (Office)	N/A				
Ronald Rybarczyk Government & Public Affairs Director (GPA)	(419) 698-6376 (Office) (b) (6) [redacted] (816) 536-1328 *(Mobile)	4-6	Public Information Officer / Alternate Liaison Officer		x	x
Neil Geary Government & Public Affairs (GPA)	(281) 504-8782 (Office) (281) 513-9727 *(Mobile)	4-6	Alternate Public Information Officer			
BP Notification Center (BPNC)	(800) 321-8642* (Office), (630) 961-6200 (Office), (630) 961-6965 (Fax) (Office)	N/A				

EMERGENCY RESPONSE TRAINING TYPE[1]

There are three different types of training described below including HAZWOPER, OPA, 90 / ICS, and Qualified Individual Training. An "x" has been placed in the applicable columns (type 1, 2, or 3) in the table above for the type of training completed by each individual. Blank spaces indicate training has not been completed.

TYPE[1]	**DESCRIPTION** (All training completed on an annual basis.)
1	29 CFR 1910.120 HAZWOPER
2	OPA 90 (training Reference for Oil Spill Response) and ICS
3	Qualified Individual Training

NOTE: Refer to **APPENDIX A**, **FIGURE A.2-3** for training dates.

FIGURE 3.1-3 - INTERNAL NOTIFICATIONS AND TELEPHONE NUMBERS, CONTINUED

*24 Hour Number

EMERGENCY RESPONSE CONTRACTORS			
NAME/TITLE	**PHONE NUMBER**	**RESPONSE TIME (hours)**	**RESPONSIBILITY DURING RESPONSE ACTION**
Atlantic Response Inc.	(732) 969-8555	0.5	Equipment and Personnel Emergency Response Support
Clean Harbors Cooperative	(908) 862-7500 (908) 862-7560 Fax	1	Equipment and Personnel Emergency Response Support
Marine Spill Response Corporation (MSRC)	(800) 645-7745 or (800) 259-6772 (732) 417-0500 (800) 635-6772 Fax	2	Equipment and Personnel Emergency Response Support

FIGURE 3.1-4 - EXTERNAL NOTIFICATIONS AND TELEPHONE NUMBERS

*24 Hour Number

AFFILIATION	PHONE NUMBER	TIME CONTACTED
Initial		
Carteret Fire Department	911* (732) 541-4181	
Carteret Police Department	911* (732) 541-4181	
National Response Center (NRC) - NRC will contact the USCG and EPA completing the Federal notifications.	(800) 424-8802* (202) 267-2675* (202) 267-1322 Fax	
New Jersey Department of Environmental Protection	(877) WARN DEP (877) 927-6337	
Recommended		
Federal Agencies		
Army Corps of Engineers	(732) 846-5830	
Department of Transportation (DOT)	(202) 366-4000	
Occupational Safety and Health Administration (OSHA) - Washington, D.C.	(800) 321-6742*	
U.S. Coast Guard - Activities NY	(718) 354-4353	
U.S. Environmental Protection Agency Hotline/National Response Center	(800) 424-8802	
U.S. Fish and Wildlife Service, Trenton, NJ	(609) 214-7895	
State Agencies		

New Jersey SERC; State Office of Emergency Management, Regional Operations and Intelligence Center (ROIC)	(609) 963-6900	
New Jersey State Fire Marshall	(609) 633-6106	
New Jersey State Police	(973) 578-8173	
New York Department of Environmental Conservation (DEC)	(800) 457-7362* Spill Notification (518) 457-7362	
Local Agencies		
Board of Health	(732) 541-3890	

FIGURE 3.1-4 - EXTERNAL NOTIFICATIONS AND TELEPHONE NUMBERS , CONTINUED

*24 Hour Number

AFFILIATION	PHONE NUMBER	TIME CONTACTED
Recommended		
Local Agencies		
Civil Defense	732-541-4007	
Local Emergency Planning Committee (LEPC)	(732) 541-4007	
Water & Sewage System	(732) 541-3875	
Emergency Medical Services		
Ambulance	911* (732) 541-4181	
American Red Cross	(800) 448-3543	
Rahway Hospital	(732) 381-4200	
Raritan Bay Medical Center	(732) 442-3700	
USCG Classified OSRO's		
Atlantic Response Inc. Carteret, NJ	(732) 969-8555	
Clean Harbors Cooperative Linden, NJ	(908) 862-7500 (908) 862-7560 Fax	
Marine Spill Response Corporation (MSRC) Edison, NJ	(800) 645-7745 or (800) 259-6772 (732) 417-0500 (800) 635-6772 Fax	
Neighboring Facilities		
Arthur Kill LLC - Arthur Kill Generating Station	(718) 390-2734	
ICL Performance Products LP - Carteret,	(732) 570-2027*	

NJ Plant		
Kinder Morgan	(732) 541-5161*	
Radio Stations		
WCBS News	(212) 975-8988	
Service Providers (as needed)		
Auchter Ind. Services	(908) 862-2277	

FIGURE 3.1-4 - EXTERNAL NOTIFICATIONS AND TELEPHONE NUMBERS , CONTINUED

*24 Hour Number

AFFILIATION	PHONE NUMBER	TIME CONTACTED
Recommended		
Service Providers (as needed)		
Buckeye P/L	(908) 862-6060*	
CHEMTREC - Washington, D.C.	(800) 424-9300	
Colonial P/L	(732) 750-0727*	
Ferrara Electric	(646) 208-3072	
Fuels Technology, Warrenville, IL	(630) 845-4500 (630) 845-4501 FAX	
Natural Resources Damage Assessment (NRDA) - Washington State, Attn: Gary Mauseth	(425) 823-4841 (206) 954-9648	
Television Stations		
WNET	(973) 643-3315	
Transport Companies		
CSX Railroad (Suspend Train Operations)	(800) 232-0144*	
Waste Management		
Chemtron Corp. - Avon, OH	(440) 933-6348	
Heritage Environmental Services LLCKansas City, MO	(816) 453-4321 (866) 436-8778 (816) 753-0180 Fax	
WasteTrak (List of approved disposal sites): https://www.wastetrak.com/security/login.asp. BP Terminal Mangers and ECs have the required login information.		
Weather		
National Weather Service (Recorded Forecasts)	(609) 261-6600	
Wildlife Rehabilitation		
TRI-State (Wildlife clean-up & Rehabilitation) - Delaware	(800) 710-0695 Pager (800) 710-0696 Pager	

	(302) 737-7241 Office	

FIGURE 3.1-5 - REPORTING REQUIREMENTS

AGENCY / ADDRESS	REPORTING REQUIREMENT
National Response Center c/o United States Coast Guard (G-OPF), 2100 2nd Street Southwest - Room 2611 Washington, D.C. 20593-0001	TYPE: Any discharge or sighting of oil, or hazardous substance exceeding an RQ VERBAL: Immediately or online at: http://www.phmsa.dot.gov/hazmat/incident-report Click on "report an incident online". NRC will respond within 30 minutes. WRITTEN: Not Required
New Jersey Department of Environmental Protection 406 E. State Street Trenton, NJ 08625	TYPE: For all spills (discharges) into waters of the State or onto lands and/or from which it might flow or drain into said waters. VERBAL: Immediately
Occupational Safety And Health Administration (OSHA) 200 Constitution Avenue Washington, D.C. 20210	Per 29 CFR 1904.8, notify if there has been a fatality from a work related incident or the inpatient hospitalization of three (3) or more persons as a result of a work related incident. VERBAL: Immediately to OSHA. Also within 8 hours to Cal-OSHA regional office. Report: Facility Name, Location and Time of Incident, Number of Fatalities/ Hospitalizations, Contact Person, Phone Number, Description of Incident. WRITTEN: As requested.
Police and Fire (City) Carteret, NJ	TYPE: For all spills (discharges) into waters of the State or onto lands and/or from which it might flow or drain into said waters. VERBAL: Immediately

FIGURE 3.1-5 - REPORTING REQUIREMENTS

AGENCY / ADDRESS	REPORTING REQUIREMENT
U.S. Coast Guard - Sector NY 212 Coast Guard Drive Staten Island, NY 10305	TYPE: Immediately for all spills that impact or threaten navigable water or adjoining shoreline. VERBAL: Notification to the USCG is typically accomplished by the call to the NRC. WRITTEN: As the agency may request depending on circumstances.
U.S. Dept. of Transportation - Information Resources	TYPE: In addition to the reporting of accidents to the NRC, a written accident report (PHMSA Form 7000-1, provided in Appendix K) must be submitted for releases resulting in any of

Manager Office of Pipeline Safety Research and Special Programs Administration 400 Seventh Street Southwest, Room 2103 Washington, D.C. 20590-0001	the following: 1. Explosion or fire not intentionally set by the operator. 2. Release of five gallons or more of hazardous liquid or carbon dioxide, except that no report is required for a release of less than five barrels resulting from a pipeline maintenance activity if the release is: a. not one described under the NRC's reporting conditions. b. confined to the property or pipeline right-of-way; and c. cleaned up promptly. 3. Death of any person. 4. Personal injury necessitating hospitalization. 5. Estimated property damage, including cost of cleanup and recovery, value of lost product, and damage to the property of the operator or others, or both, exceeding $50,000. VERBAL: Call to the NRC meets the required verbal notification under DOT reporting requirement. WRITTEN: As soon as practicable, an accident meeting any of the above criteria must be reported on PHMSA Form 7000-1. The report must be sent to DOT no later than 30 days after the release. Changes or additions to the original report (PHMSA Form 7000-1) must be filed as a supplemental report within 30 days.
U.S. Fish and Wildlife Service 1849 C Street NW Washington, D.C. 20240-0002	TYPE: Wildlife Protection / Rehabilitation. VERBAL: Immediately WRITTEN: As the agency may request depending on circumstances

SECTION 4 Last revised: July 2008

RESPONSE TEAM ORGANIZATION

4.1 RESPONSE STRUCTURE

The Company's Incident Response Organization consists is based on three (3) functional tiers:

- Facility Tactical Response Team (TRT)
- Performance Unit and National BART Incident Management Team (IMT)
- Business Support Team (BST)
- Executive Support Team (EST)

Note: The TRT and IMT response personnel comprise the first tier of the BP response structure.

The teams are organized and respond in a manner consistent with the organizational and management principles of the Incident Command System (ICS):

- Common Terminology
- Manageable Span-of-Control
- Management by Objectives
- Consolidated Incident Action Plan
- Comprehensive Resource Management
- Establish Incident Facilities
- Integrated Communications

The incident management framework expands and contracts to fit all risks and all hazard response as well as incident size, ie average most probable, maximum most probable and worst case spills.

4.1.1 Asset Tactical Response Team (TRT)

The first BP person on-scene will function as the BP Incident Commander (IC) until relieved by an authorized supervisor of equal or higher training. The Terminal Manager or Pipeline Team Leader will typically assume and retain control of the response operations within control of the Asset. Transfer of Command and incident briefing will take place via face-to-face meeting.

The number of positions/personnel required to staff the Asset TRT will depend on the incident size and complexity. The IC is responsible for assigning ICS response roles to asset staff, and overall safety of all responders and communities while directing the response activities. The IC will also assume all the primary response positions until the duties can be delegated to other qualified personnel.

Led by an Incident Commander (IC) aka On-Scene Commander, the team is also composed of the following functional roles:

- Site Safety Officer
- Staging Area Manager
- Planning Section Chief
- Situation Unit Leader
- Operation Section Chief
- Logistics Section Chief
- Information/Liaison Officer

4.1.1 Asset Tactical Response Team (TRT), Continued

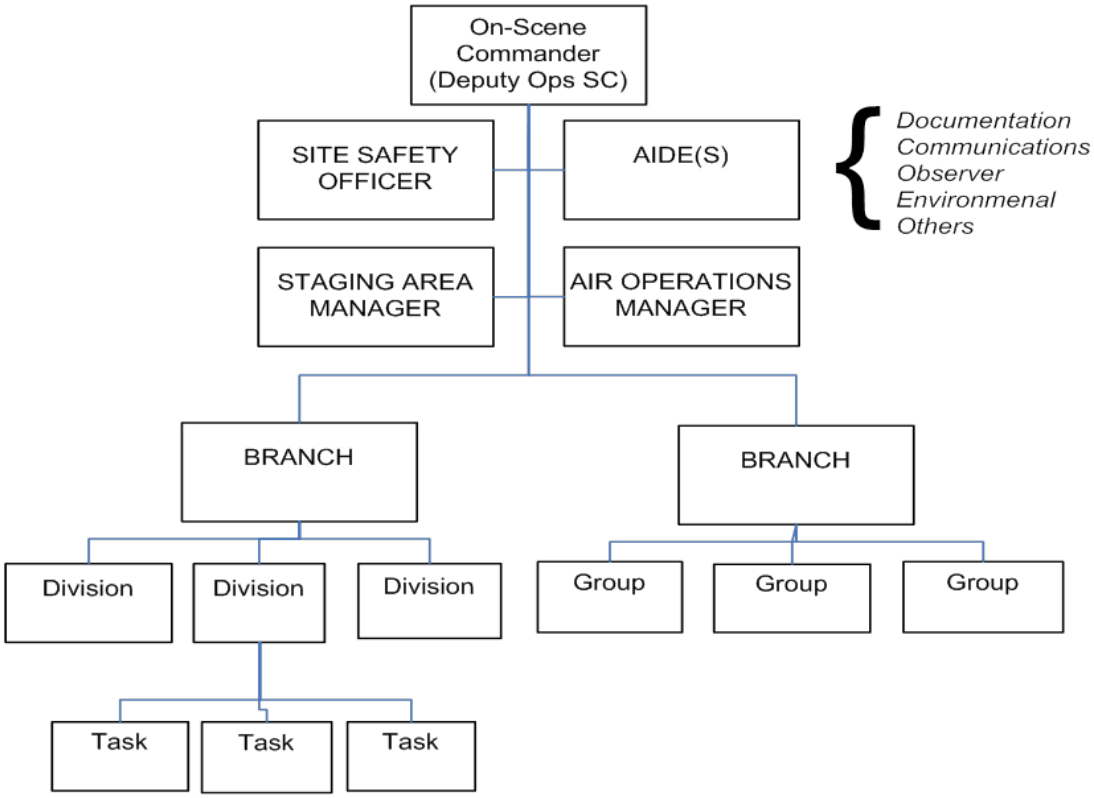
The TRT primary mission is to:

- Recognize emergency and control spill source (if applicable), if safe to do so
- Ensure safety of all responders and the community
- Evacuate, if necessary, and initiate/execute accountability processes (roll call)
- Initiate and execute Notifications of external agencies and internal stakeholders
    - Including 911, OSRO, Supervisor, NRC (See **SECTION 3**)
- Establish Unified Command (UC) with external responders
- Activate IMT, if local response resources are exhausted

The Asset Tactical Response Team organization is shown in **FIGURE 4.1-1**. Detailed role descriptions of the TRT response team positions are provided in **SECTION 4.6**. Note, if a full IMT is activated, the TRT will be integrated into the typical IMT Organization as shown in **FIGURE 4.1-2**.

FIGURE 4.1-1 - TYPICAL TRT ORGANIZATION

(Click to view larger)



BRANCH	Functional (e.g., source control, spill response, fire suppression, etc.) Organizational (e.g., BP, Police, Fire Department, etc.) Geographic
DIVISION	Geographic
GROUP	Functional
TASK	Work Specific (e.g., safety, security, SAR, mechanical recovery, etc.) For span-of control reasons, may be organized into Task Forces or Strike Teams

4.1.2 Incident Management Team (IMT)

The East of Rockies USPL Incident Management Team's (IMT's) role is to provide strategic direction to incident response operations; support tactical responders; address tasks best handled at the IMT level; and interface with and provide information to external parties and internal stakeholders. The organization chart depicted in **SECTION 4.6** contains generic positions. This organization can expand and contract to fit any size incident.

Led by an Incident Commander, the team is composed of the following functional components:

- **Command Staff (Officers)**
  General Staff (Chiefs)
  - Safety
    * Planning Section
  - Information
    * Operations Section
  - Liaison
    * Logistics Section
  - Law

* Finance Section
- Human Resource
- Security
- Deputy IC

The USPL IMT is comprised of BP employees and contractors to support a prolonged response, as necessary. Additional IMT response support is available via BP's national response team, Mutual Response Team (BART), which comprised of employees from all of the North American business units. Response personnel support can be deployed to the USPL asset to provide manpower and expertise, to help respond and manage the incident.

The IMT primary mission is to:

- Ensure safety of all responders and the community.
- Form a Unified Command structure with local, state and federal agencies.
- Provide strategic direction to emergency response operations.
- Support tactical responders.
- Address tactical and/or crisis issues.
- Develop and maintain integrated communications with external parties and internal stakeholders.

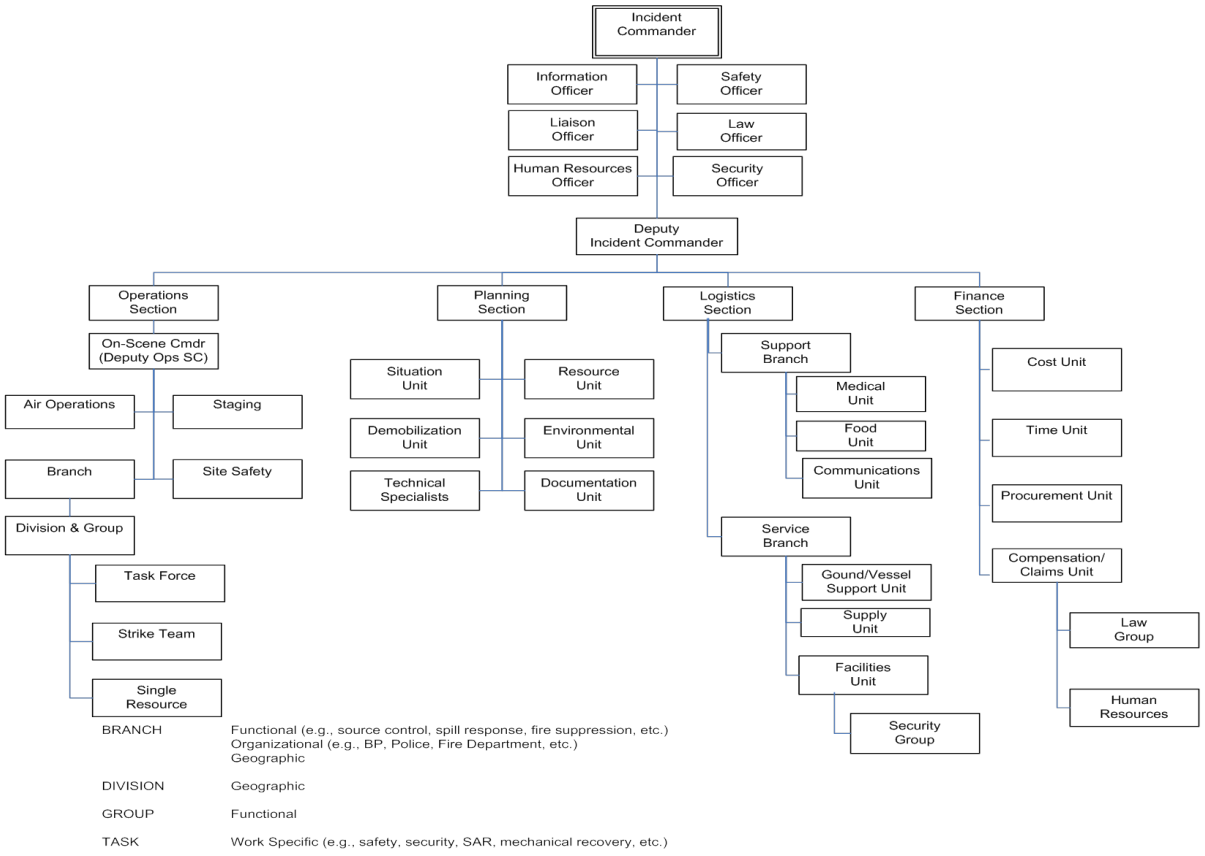
The IMT functions include, but not limited to:

- Incident assessment (nature and status) of tactical response operations.
- Developing strategic objectives and response priorities.
- Securing the necessary resources to support tactical response operations.
- Working with the Asset Tactical Response Team (TRT) to develop Incident Action Plans describing field assignments for the next operational period.
- Instituting and enforcing appropriate financial controls.
- Continuously assessing incident potential to determine an incident's capacity to grow into a crisis situation.

The IMT organization is shown in **FIGURE 4.1-2**. Detailed role descriptions of the IMT response team positions are provided in **SECTION 4.6**.

FIGURE 4.1-2 - TYPICAL IMT ORGANIZATION

(Click to view larger)



4.1.3 Business Support Team (BST)

A team comprised of US Pipelines & Logistics (USPL) Leadership personnel provides business support to the field location during an incident. This team addresses business related issues that could adversely impact USPL or the Company NOT manage incident tactics.

Led by a Crisis Manager, the team is composed of the following functional roles:

- Aide de Camp
- Health Safety Security Environmental Advisor
- Human Resources Advisor
- Legal Officer
- External Affairs Advisor
- Security Advisor
- Business Continuity Advisor

The BST mission is to avoid crisis, whenever possible, and to mitigate crisis situations that cannot be avoided, to the maximum extent possible. This team, like the IMT, can expand and contract to effectively manage the incident issues.

The BST Crisis Manager will assess the situation, and decide on the most appropriate course of action. If the incident is minor, requires no additional BST assistance and poses little crisis threat, the Crisis Manager can elect to simply monitor the situation.

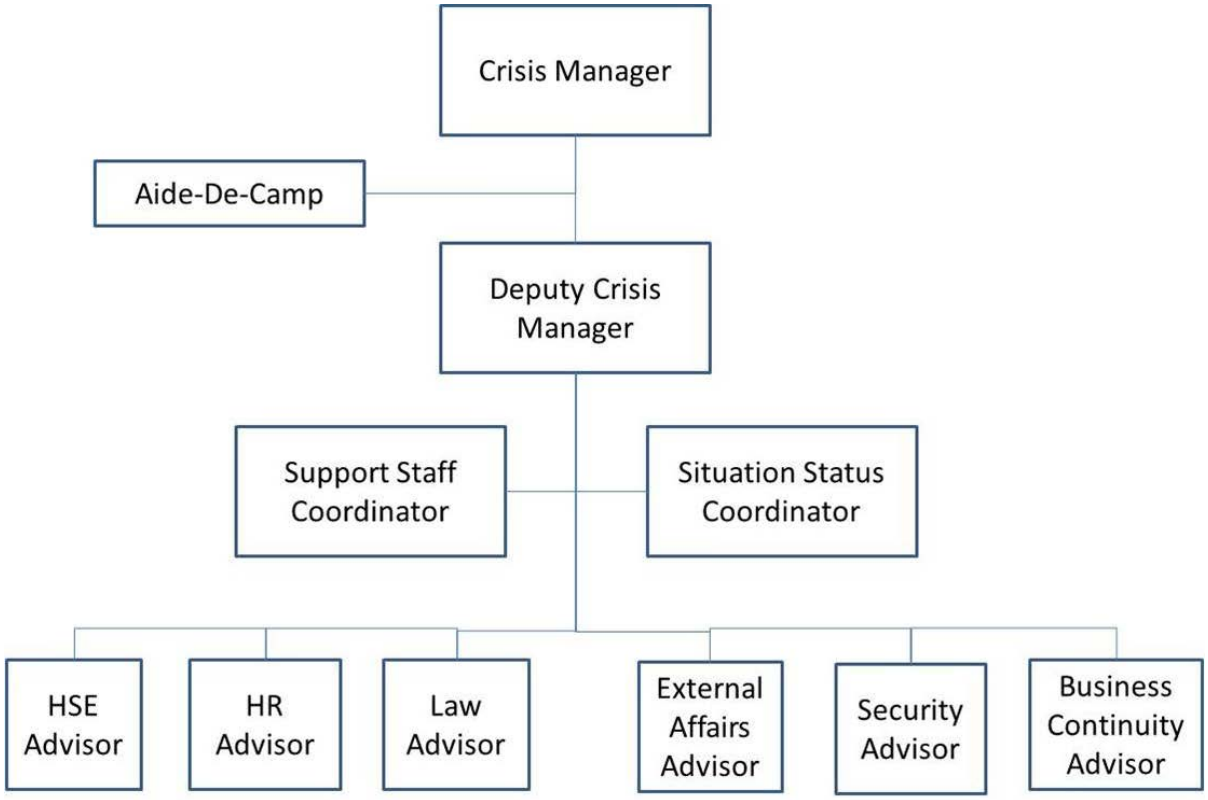
All incidents that involve injuries, fatalities or the implementation of tactical response equipment should be reported (per the incident reporting procedure in the USPL Safety Manual) to the BST Crisis Manager, as soon as possible. This can be accomplished through

the process outlined in **SECTION 4.2** below. The Terminal Manager/Pipeline Team Leader (TM/TL) Incident Commander should provide a brief account of the incident facts, initial response efforts, agency and media involvement and Facility Tactical Response Team/IMT support needs (See **SECTION 5.2.1 - ICS 201**). A more detailed briefing can be provided to the BST later.

If the Crisis Manager determines a potential or actual crisis exists, the BST will be activated. The typical BST organization is shown in **FIGURE 4.1-3**.

FIGURE 4.1-3 - TYPICAL BUSINESS SUPPORT TEAM ORGANIZATION

(Click to view larger)



4.1.4 Executive Support Team (EST)

The BST Crisis Manager will communicate incident details to the Executive Support Team (EST) Leader. The EST has direct responsibility for managing any issues arising from the incident that could have Group-wide implications. These high-level concerns include the protection of the Group's reputation, operability and viability. The team typically is comprised of senior executives. A typical organization chart for this team is out of scope of this response plan.

4.2 ACTIVATION PROCEDURES

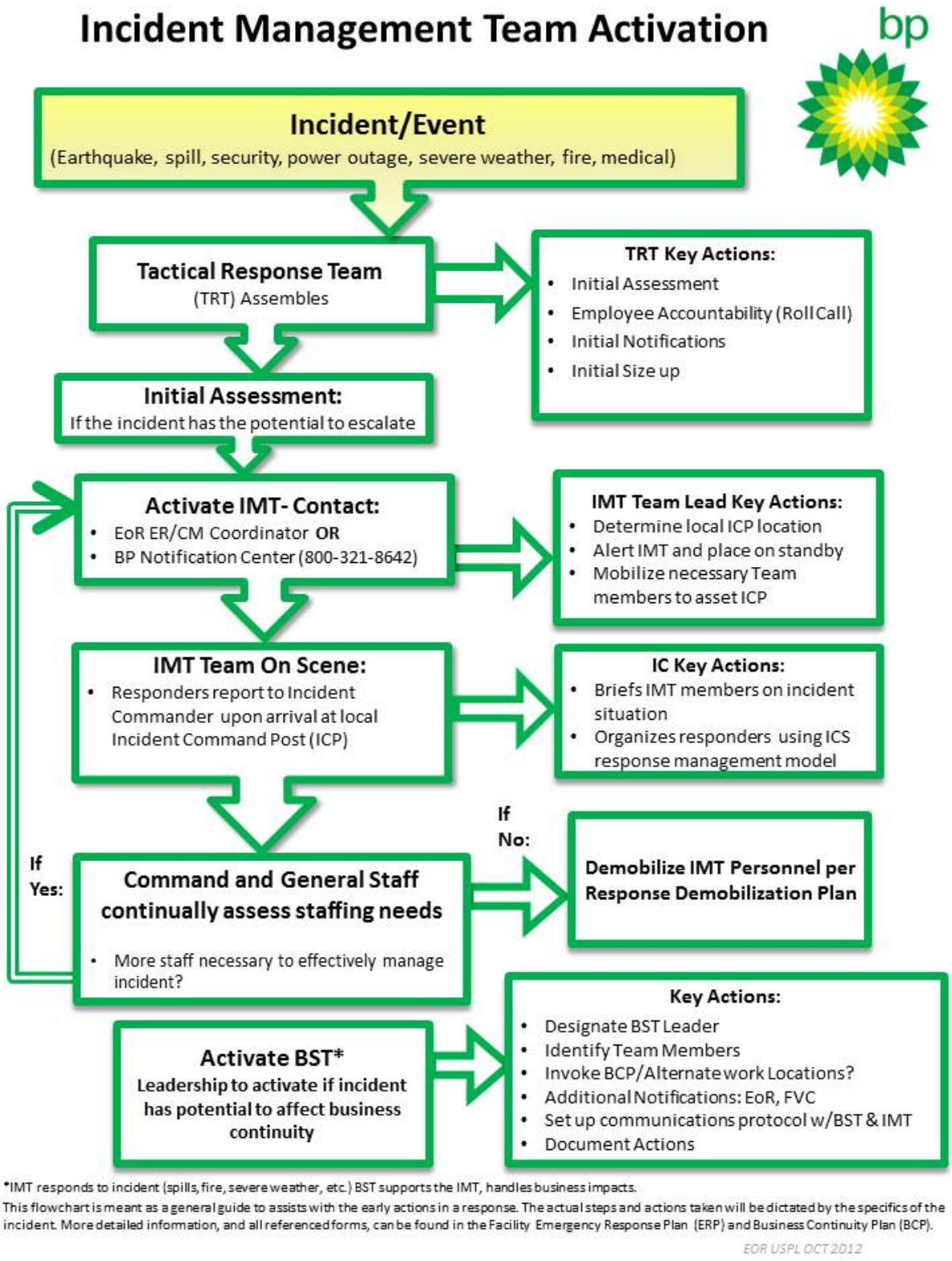
Activation of appropriate Company response teams may be accomplished in stages depending on the incident size and complexity. If an incident has been discovered and it is determined by the Terminal Manager/Team Lead (TM/TL) Incident Commander that a response is warranted,

team activation proceeds as follows (see **FIGURE 3.1-1**):

- The Terminal Manager/Team Leader (TM/TL) Incident Commander is notified of an incident.
- TM/TL Incident Commander notifies the Area Manager (AM).
  - The TM/TL or any asset employee is empowered to activate additional internal and external response resources to manage the incident:
  - **Internal:** Calling the BP Notification Center (BPNC) or contacting the IMT Manager directly.
  - **External:** response resources are cited in **SECTION 3** of this plan.
- The AM continues the upward notification process (through appropriate levels of US Pipelines & Logistics management).
- The BPNC contacts the Emergency Preparedness / Crisis Management (EP/CM) Advisor.
- The Emergency Response/Crisis Manager (ER/CM) Coordinator is notified (via BPNC, TM/TL IC or AM). The ER/CM will coordinate directly with the Asset TRT to mobilize necessary response personnel support.
- If activated, all or any part of the IMT may be deployed to the Incident Command Post (ICP).
- TM/TL IC briefs IMT members, upon arrival at ICP.
- IC and Section Chiefs continually assess staffing needs and activates/demobilize response resources as dictated by response requirements.

FIGURE 4.2-1 - INCIDENT MANAGEMENT TEAM ACTIVATION PROCEDURE

(Click to view larger)



4.3 TEAM MEMBER RESPONSE TIMES

The TRT and IMT will mobilize to the ICP identified by the TM/TL Incident Commander. The TRT expected arrival time during off hours is 1-2 hours and the IMT response times, pending variables ie weather, and incident location should arrive within the first 24 hours of the response.

4.4 UNIFIED COMMAND

The Company trains and utilizes the Incident Command System (ICS) to integrate federal, state and local agencies into the IMT to organize diverse responding agencies into one unified team.

A Unified Command Structure consists of three key On-Scene Coordinators: Federal On-Scene Coordinator (FOSC), State On-Scene Coordinator (SOSC) and the Responsible Party Incident Commander (RP). These entities will share decision-making authority as Incident Commanders and will consult with each other regarding spill response management issues. Ie development and implementation of strategic decisions and approves the ordering and releasing of resources.

The FOSC will coordinate all federal agencies involved in the response. The SOSC will coordinate all state and local agencies involved in the response activities. The Responsible Party Incident Commander will coordinate all company activities.

The IMT will expand or contract to maintain efficient support to incident operations and objectives. Agencies will be integrated throughout the team, with approval of the Company RPIC, to assure the best response with available resources.

4.5 QUALIFIED INDIVIDUAL (QI)

The Qualified Individual (QI) is an English-speaking Company representative, located in the United States, available on a 24-hour basis, with full authority to obligate funds, implement response actions and immediately notify the appropriate Federal officials and response organizations. The designated Company QIs are listed in **FIGURE 3.1-3**. A description of QI training is provided in **APPENDIX A**. A copy of the "Appointment and Authorization of Qualified Individuals" letter can be found in the Additional Information appendix.

4.5 QUALIFIED INDIVIDUAL (QI), CONTINUED

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

- Activate internal alarms and hazard communication systems to notify all appropriate personnel.
- Notify all response personnel as needed.
- Identify character, exact source, amount, and extent of the release and other necessary items needed for notifications.
- Notify and provide information to appropriate federal, state, and local authorities.
- Assess the interaction of the spilled substance with water and/or other substances stored at the Facility and notify on-scene response personnel of assessment.
- Assess possible hazards to human health and the environment (including outside the fence line).
- Coordinate rescue and response actions.
- Must be familiar with the planning distance **(FIGURE D.4-1)** and equipment

deployment locations.

- Assess and implement prompt removal actions.
- Access Company funds to initiate cleanup activities.
- Direct cleanup activities until properly relieved of responsibility or incident is terminated.

4.6 TRT AND IMT ROLES/RESPONSIBILITY DESCRIPTION

The following role descriptions are intended to be used as a tool to assist IMT members in their particular positions within the Incident Command System (ICS). Refer to **FIGURE 4.1-2**.

All ICS roles/responsibilities including Section Support (Unit Leaders, Branch Directors, Technical Specialists, etc) descriptions and checklists can be referenced in the BP Incident Management Handbook (BP IMH).

The following are responsibilities which are common to the Command Staff (ICS Officers), General Staff (Section Chiefs) and Unit Leaders.

COMMON RESPONSIBILITIES

- ☐ Obtain initial briefing from Incident Commander (IC), attend daily staff meetings and briefings, and relay relevant information to personnel assigned to function
- ☐ Size up incident, identify function-specific problems and solutions, and break work down into manageable tasks
- ☐ Provide Incident Commander periodic status reports
- ☐ Assist Incident Commander in
  - Analyzing incident potential
  - In preparation of Strategic Objectives & response priorities
- ☐ Provide Logistics Section Chief or Supply Unit with information on personnel, equipment, material, and supply needs for Section
- ☐ Attend Assessment Meetings and provide reports on nature and status of work
- ☐ Ensure that Finance Section Chief is advised of all cost commitments by Staff or Section
- ☐ Compile and maintain appropriate documentation
- ☐ IMT Staffing needs:
  - Develop organization chart with personnel assigned to function or Section
  - Provide Resource Unit with initial and, as necessary, updated organization chart(s)
  - Maintain proper span-of-control when assigning tasks to Section personnel
  - Consider alternate or backup personnel for extended (24-hour) coverage.
- ☐ Brief IMT Staff personnel on items discussed during meetings; assign Action Items, as

appropriate

- ☐ Prepare verbal or written transition report for incoming personnel assigned to function
- ☐ If requested, assist Planning Section Chief in preparation of
  - Incident Potential Worksheet
  - Incident Action Plan and/or General Plan

INCIDENT COMMANDER

Responsible for the overall management of incident response operations and for serving as the Incident Management Team's (IMT's) primary contact person with all involved or interested external parties. If Unified Command (UC) is established, these responsibilities are held jointly with UC members.

- ☐ Ensure that personnel safety is accorded the highest priority during conduct of incident response operations
- ☐ Establish and maintain an organization capable of providing management direction to, and support for, at-the-scene tactical response operations
- ☐ Supervise incident response operations and ensure that they are carried out in a manner consistent with BP policy, appropriate government directives, and the needs and concerns of impacted areas
- ☐ Provide an initial briefing either to IMT as a whole or to members of Command and General Staffs
- ☐ Analyze incident potential
- ☐ Establish Strategic Objectives and response priorities, and ensure IMT and tactical response personnel are carrying out incident response operations in a manner consistent with objectives and priorities
- ☐ Ensure that all required and appropriate notifications have been made to BP senior management (i.e., Business Unit and/or Business Support Team), government agencies, and BP partners
- ☐ Keep BP senior management informed of nature and status of incident and incident response operations
- ☐ Serve as primary on site contact person for BP senior management, news media, government representatives, and BP partners
- ☐ Review and approve requests for non-BP owned response resources, allocate critical resources, and authorize demobilization of resources
- ☐ Establish a Unified Command Structure with appropriate government agency On scene Coordinators
- ☐ Forecast duration of incident response operations; if necessary, establish "operational" periods and shift schedules
- ☐ Monitor and evaluate effectiveness of response operations. Conduct Assessment Meetings as appropriate.
- ☐ Review and approve press releases and statements as they relate to incident response operations

- ☐ Determine when IMT is prepared to initiate Incident Action Plans (written and verbal). Approve and authorize implementation of Incident Action Plans
- ☐ Consider need for an alternate or backup person for extended (24-hour) coverage
- ☐ Compile and maintain appropriate documentation

DEPUTY INCIDENT COMMANDER

Responsible for assisting the Incident Commander through the direct supervision of work being carried out by the Section Chiefs. Also responsible for knowing the Incident Management System (IMS) and making sure it is used effectively and efficiently during the conduct of incident response operations.

DEPUTY INCIDENT COMMANDER RESPONSIBILITIES

- ☐ Assume any responsibility delegated by Incident Commander (IC).
- ☐ Ensure that Incident Command Post (ICP) is set up and made operational in a timely fashion
- ☐ Monitor IMT members activation; determine and advise IC on availability of key team members
- ☐ Ensure that each Section gets organized in a timely fashion
- ☐ Prepare organization chart for Command Staff; consider need for backup personnel for extended (24-hour) coverage.
- ☐ Assist IC in analysis of incident potential and development of Strategic Objectives and response priorities
- ☐ Coordinate activities of Section Chiefs to ensure conduct of safe, effective, and efficient incident response operations
- ☐ Assist IC in ensuring that operations are carried out in a manner consistent with BP policy, Incident Management System, and appropriate government directives
- ☐ Focus on communications; address communication problems as they arise
- ☐ Facilitate IMT Meetings; chair IMT Meetings, if instructed by IC.
- ☐ Follow up on Action Items identified during formal IMT Meetings
- ☐ Ensure that (Unified) Command objectives and priorities are being addressed by balance of IMT and tactical response personnel
- ☐ Interface with (Unified) Command to ensure that their problems and solutions are addressed by balance of IMT in a timely fashion
- ☐ Provide IC informal briefings, as necessary, on nature and status of incident and incident response operations
- ☐ Work with Section Chiefs to ensure that appropriate documentation is compiled and forwarded to Planning Section (i.e., Chief or Documentation Unit Leader)
- ☐ Ensure that response operations are closely coordinated, and resolve any conflicts that may arise between these operations
- ☐ Ensure that appropriate BP and/or government directives are communicated to and followed up on by Section Chiefs

- ☐ Serve as secondary on site contact person for BP senior management, government representatives, and BP partners

SAFETY OFFICER

Responsible for providing expertise on safety issues that may arise during incident response operations execution. Responsible for the preparation, maintenance, and distribution of an incident-specific Site Safety Plan; investigating near misses and accidents; preparing Safety Bulletins; reviewing field assignments to ensure that they can be carried out in a manner consistent with the Site Safety Plan and supervising the work of any Technical Specialists (Industrial Hygienists, Safety professionals, air monitoring, decontamination, etc.) supporting incident response operations.

- ☐ Supervise preparation of written, incident-specific Site Safety Plan
- ☐ Receive information from Site Safety Officer and brief Incident Commander and Situation Unit on:
  - Status of personnel (i.e., missing, injured, dead)
  - Hazards present
  - Location of hazard control zones
  - PPE requirements
  - Decontamination requirements
  - Location of first aid station(s)
  - Emergency medical procedures
  - Hazards present at incident scene and measures being instituted to protect response personnel against hazards
  - Contents of incident-specific Site Safety Plan
- ☐ Advise Incident Commander on when it is safe to enter or return to an impacted area. Exercise emergency authority to prevent or stop unsafe acts.
- ☐ Ensure compliance with all relevant BP and governmental safety requirements
- ☐ Obtain and provide copies of Material Safety Data Sheets (MSDSs) for spilled/emitted materials
- ☐ Brief Section Chiefs on safety concerns and precautions; ensure key personnel are familiar with site safety issues
- ☐ Monitor BP personnel and contractors for conformance with incident-specific Site Safety Plan and associated requirements
- ☐ Set up a system to identify/ eliminate, safety hazards in all aspects of incident response operations
- ☐ Confirm/establish industrial hygiene standards and requirements to be observed by on-scene tactical response personnel. Select, retain, and supervise Industrial Hygienists, Safety professionals, toxicologists, etc., when needed
- ☐ Provide information and advice to on-scene commanders (Deputy Operations Section Chief or Branch Directors), Site Safety Officer, Incident Commander, and Section Chiefs regarding toxic properties of, and immediate and long-term public health issues associated with, chemicals involved in incidents

- ☐ Evaluate impact of incident and remedial activities on health of employees, contractors, and affected citizens
- ☐ Ensure response personnel have necessary level of safety training
- ☐ Coordinate safety-related communications; supervise preparation of and issue Safety Bulletins on issues affecting or likely to affect worker safety
- ☐ Establish procedures, with Medical Unit, for handling medical emergencies, evacuations and in preparation of an ICS 206 Emergency Medical Plan
- ☐ Assist Information Officer in describing any toxic hazards to media and public

SAFETY OFFICER, CONTINUED

- ☐ Provide Planning Section Chief or Situation Unit initial and, as necessary, updated information on safety and health considerations, updated information on location of hazard control zones, decontamination areas, and first aid station(s) for Situation Map
- ☐ Assist in IAP development:
- ☐ Prepare Field Assignment(s) for all safety tasks to be carried out by TRT
- ☐ Provide information on safety issues associated with field assignments
- ☐ Review each field assignment for next operational period (NOP) against existing Site Safety Plan

SECURITY OFFICER

Responsible for providing expert guidance on how to respond effectively to security-related incidents or security problems/issues during incident response operations. Works with Security Unit Leader (Logistics) to ensure that adequate security services are provided for on-scene tactical response operations and at incident facilities.

SECURITY OFFICER RESPONSIBILITIES

- ☐ Serve as security advisor to Incident Commander
- ☐ Ensure Facility Security procedures and plan are being followed
- ☐ Prepare and maintain an incident specific Security Plan which ensures response areas are secure from non-authorized personnel ie ICP, TCP, Staging Area, etc.
- ☐ Issue Security Bulletins, as necessary
- ☐ Select, retain, and supervise outside security specialists, if needed
- ☐ Provide executive protection, as required
- ☐ Coordinate security operations with Federal, State and local government security agencies
- ☐ Investigate threats and crimes against company personnel and property

- ☐ Maintain record of security operations

SITE SAFETY OFFICER

Responsible for ensuring that all appropriate actions are taken to protect the health and safety of on-scene tactical response personnel.

SITE SAFETY OFFICER RESPONSIBILITIES

- ☐ Travel to incident scene; check in at Tactical Command Post (TCP); report to On-Scene Commander (Deputy Operations Section Chief) or Branch Director supervising on-scene response operations
- ☐ If necessary, assist On-Scene Commander (Deputy OSC) or Branch Director in:
  - Determining safe approach guidelines
  - Defining Isolation Perimeter
  - Determining need to evacuate non-responders from Isolation Zone
  - Instituting personnel accountability system at the incident scene
  - Addressing problem(s), solution(s), and task(s) to be performed
  - Developing emergency medical procedures
- ☐ Characterize chemical and physical hazards in area(s) where task(s) are to be carried out before task(s) is/are initiated
- ☐ If necessary, organize and manage a Site Entry Task to carry out "on site" Site Characterizations
- ☐ Ensure Site Entry Team is adequately staffed (i.e., "buddy" and backup), equipped, and briefed and consistently monitor Site Entry Team progress
- ☐ Define hazard control zones, if necessary; ensure all tactical responders are aware of location of all hot and warm zones
- ☐ Ensure all tactical responders who enter a hot zone are adequately equipped, trained, and briefed (i.e., tailgate safety briefing)
- ☐ Determine level of PPE to be worn in each hot and warm zone
- ☐ Determine level of decontamination to be carried out in warm zone
- ☐ Evaluate need for first aid at incident scene; establish first aid station(s)
- ☐ Monitor tactical response operations; order immediate cessation of any unsafe task or work practice
- ☐ If tactical response operations are broken down into multiple Branches and/or Divisions, determine need for Site Safety Officer(s) at Branch and/or Division levels
- ☐ If there are any fatalities or injuries during conduct of tactical response operations, participate in all related investigations; issue Safety Bulletin(s)
- ☐ Advise Staging Area Manager regarding food, water, shelter, and sanitary requirements for tactical responders
- ☐ Advise Safety Officer on status of personnel (i.e., missing, injured, dead) and, if underway, any safety-related tasks

SITE SAFETY OFFICER, CONTINUED

- ☐ Brief field supervision on:
  - Hazards present (i.e., chemical, physical, and operational) broken down by hot zone
  - Location of hazard control zones
  - PPE requirements broken down by hot and warm zone
  - Decontamination requirements broken down by warm zone
  - Location of first aid station(s)
  - Emergency medical procedures
- ☐ Provide safety status reports to On-Scene Commander (Deputy OSC) or Branch Director and to Safety Officer
- ☐ Compile and maintain appropriate documentation

LIAISON OFFICER

Responsible for organizing and managing all government and community affairs activities associated with incident response operations.

- ☐ Organize and manage all government and community affairs activities
- ☐ Serve as principal advisor to Incident Commander (IC) on all matters relating to external communications and interactions with non directly involved government agencies and non governmental organizations
- ☐ Advise IC on government affairs and community relations impacts of incidents and incident response operations
- ☐ Obtain necessary approvals from IC prior to release of information to non directly involved government agencies and non governmental organizations
- ☐ Select, retain, and supervise government affairs and media relations specialists, when needed
- ☐ Provide status reports to Business Support Team (BST); keep BST informed about status of work on all government affairs and community relations problems and solutions that are judged to be, or have potential to become, crisis situations
- ☐ Serve as IMT contact person for non-directly involved government agencies and non governmental organizations
- ☐ Identify government agency and non governmental organization audiences and their concerns
- ☐ Develop proactive methods for addressing government agency and non governmental organization concerns:
  - Fact sheets
  - Meetings

- Town Hall meetings
- Tours

☐ Provide Situation Unit with information on scheduled meetings for posting in Information Center

☐ Monitor statements made by non-directly involved government agencies and non governmental organizations

☐ Keep Incident Commander informed about content and tenor of statements made by non-directly involved government agencies and non governmental organizations

INFORMATION OFFICER

Responsible for organizing and managing all public affairs activities associated with incident response operations.

☐ Organize and manage all media-related activities

☐ Serve as principal advisor to Incident Commander (IC) on all matters relating to external communications and interactions with media

☐ Advise IC of public affairs impacts caused by the incident and incident response operations

☐ Identify "public" audiences and their concerns

- Develop proactive methods for addressing "public" concerns:
- "If Asked" statements, Press releases, briefings, conferences, Town Hall Meetings, One-on-one interviews, tours, etc.

☐ Obtain necessary approvals from IC prior to release of information to public

☐ Provide Situation Unit with the following information for posting on the Information Center:

- Press releases, briefings, conferences
- Town Hall meeting schedule
- "If Asked" statements
- Other external relations-related materials

☐ Work with government agency Public Affairs personnel to coordinate statements to the public; establish a Joint Information Center (JIC), if appropriate

☐ Prepare IC for interactions with media

☐ Keep IC informed about content and tenor of media reports

☐ Work with Logistics Section to set up a media center, if warranted

☐ Select, retain, and supervise public affairs specialists, when needed

☐ Circulate progress reports for non-involved BP personnel and BP partners

☐ Monitor press reports. Maintain record of newspaper articles, radio and television broadcasts, press conferences, and briefings

- ☐ Provide status reports to Business Support Team (BST); keep BST informed about status of work on all public relations problems and solutions that are judged to be, or have potential to become, crisis situations

LAW OFFICER

Responsible for providing advice on legal issues associated with incident response operations and for handling all legal matters.

- ☐ Serve as legal advisor to Incident Commander (IC) and provide legal advice to other members of IMT and TRT
- ☐ Prepare summary reports which examine legal situation, key issues associated with the incident, with options and courses of action that can be followed; follow up to determine their effectiveness
- ☐ Determine applicable laws, legal exposures, and validity of defenses, and develop necessary legal strategies
- ☐ Become familiar with all incident aspects in order to identify and address legal issues that may arise during incident response operations
- ☐ Act as primary contact for BP partners' legal representatives; coordinate legal action taken in concert with partners, if possible and appropriate
- ☐ Select, retain, and supervise outside legal counsel, if needed
- ☐ Determine BP and BP partners' legal relationship with other involved parties. Ensure that no conflicts of interest arise with other parties, insurers, etc. during conduct of incident response operations
- ☐ Advise IMT members on need to restrict access to affected facility, vessel and/or incident-related facilities for legal or insurance reasons
- ☐ Advise IC, Section Chiefs, and Documentation Unit Leader on documentation retention guidelines to support incident-related litigation. Consistently review process to ensure compliance with established guidelines.
- ☐ If requested to do so by IC, review press releases and other correspondence directed to external parties and government authorities
- ☐ Handle all contract-related legal matters.
- ☐ Assist Finance Section Chief or Compensation/Claims Unit in establishing and implementing third-party settlement procedures, arranging for adjustment assistance, and processing claims.
- ☐ Ensure that information that may be relevant to the defense and/or settlement of future claims or litigation is gathered and preserved
- ☐ Provide Ops Section Chief and Planning Section Chief legal advice on operations related to the handling of land issues, offsite waste storage and disposal
- ☐ Assist Human Resources Group in event of fatalities or major injuries during incident response operations
- ☐ Provide status reports to Business Support Team (BST); keep BST informed about legal problems and solutions that are judged to be, or have the potential to become, crisis situations

OPERATIONS SECTION CHIEF

Responsible for providing strategic direction & support to field personnel. Also responsible for receiving information on nature/status of on-scene tactical response operations, providing information to Incident Commander (IC) & IMT team.

- ☐ Serve as primary IMT contact person for field personnel; receive Field Reports (including ICS 201 at the beginning of the incident).
- ☐ Establish direct line of communications (i.e., Command Network) protocol with field personnel
- ☐ Discuss/define initial strategy with Deputy Incident Commander (DIC) and other appropriate IMT members Officers; provide regular updates on nature and status of tactical response operations
- ☐ Review and ensure strategy appropriateness and tactics being employed by field personnel; provide necessary strategic direction
- ☐ Provide Situation Unit and Resource Unit with up-to-date information on nature/status of tactical response operations and resources.
- ☐ Assist Planning Section Chief or Plan Development Unit preparing Incident Action Plan (IAP); Objectives and tactical field assignments
    - Obtain field personnel information on current tasks which will continue into the next operational period (NOP), new tasks that will be initiated before end of current operational period and continue into NOP, and new tasks that should be initiated during NOP
    - Feedback on list of resources needed to carry out tasks identified for NOP
- ☐ Ensure that personnel involved in on-scene tactical response operations have the personnel, equipment, materials, and supplies needed to carry out those operations in a safe, effective, and efficient manner
- ☐ Ensure that all Operations Section personnel are aware of and follow BP safety policies, appropriate government agency directives, and Incident Safety Plan
- ☐ Ensure government agencies concerns and impacted citizens are adequately considered in formulation and execution of response strategies
- ☐ Receive information from Planning Section Chief on location and movement of spilled or emitted materials
- ☐ Work with Environmental Unit Leader to develop protection/cleanup strategies
- ☐ Ensure that appropriate documentation is compiled by field personnel and forwarded to Documentation Unit

STAGING AREA MANAGER

Responsible for establishing and maintaining a staging area, and for coordinating the delivery of support services Ie: food, water, shelter, PPE, and sanitation services for on-

scene tactical response personnel and fuel, water, and lubricants for response equipment.

STAGING AREA MANAGER RESPONSIBILITIES

- ☐ Travel to incident scene; check in at Tactical Command Post (TCP); report to On-Scene Commander (Deputy Operations Section Chief) or Branch Director supervising on-scene response operations
- ☐ Work with On-Scene Commander (Deputy OSC) or Branch Director to identify best location to stage resources
- ☐ If On-Scene Commander (Deputy OSC) or Branch Director determines need for multiple staging areas, arrange for establishment of staging areas; appoint a Manager for each area, and establish a direct line of communications with each Manager
- ☐ For each staging area:
    - Identify exact location
    - If possible, define and secure boundaries of area
    - Identify ingress and egress points; if necessary, post signs to control traffic flow into and out of area
    - Identify and obtain personnel and equipment needed to operate area
    - Segregate resources, by kind, in area
- ☐ Institute resource check-in/check-out procedures
- ☐ Establish a direct line of communications with On-Scene Commander (Deputy OSC) or Branch Director
- ☐ Keep On-Scene Commander (Deputy OSC) or Branch Director informed about kind and quantity of resources in each area
- ☐ Work with IMT Logistics Section Chief/Communications Unit Leader to establish a Supply Network
- ☐ Receive and process resource requests generated by tactical response personnel
- ☐ Dispatch staged resources to locations specified by On-Scene Commander (Deputy OSC) or Branch Director
- ☐ Forward resource requests that cannot be addressed with staged resources to IMT Logistics Section Chief/Supply Unit Leader via Supply Network
- ☐ Receive follow-up reports from IMT Logistics Section Chief/Supply Unit Leader on status of Section's efforts to obtain requested resources
- ☐ Provide On-Scene Commander (Deputy OSC) or Branch Director status reports on resources checked-in and available in staging area and resources that are en route to staging area
- ☐ Receive guidance from Site Safety Officer
- ☐ Obtain and make available the food, water, shelter, and sanitary facilities necessary to support tactical responders
- ☐ Maintain first aid station(s) if located in staging area(s)
- ☐ Supervise demobilization of staging area
- ☐ Compile and maintain appropriate documentation

PLANNING SECTION CHIEF

Responsible for provision of short-term and, if necessary, long-term planning; the compilation and display of information on the nature/status of an incident, incident response operations; and retention of all related documentation.

PLANNING SECTION CHIEF RESPONSIBILITIES

- ☐ Supervise implementation of all applicable contingency plans
- ☐ Ensure Operations Section is provided information on sensitive resource areas that need to be protected during response operations
- ☐ Ensure all required internal and external notifications have been made
- ☐ Prepare Incident Potential Worksheet either alone or in conjunction with other members of Command and General Staff;
- ☐ Assist Incident Commander (IC) in evaluation of Incident Potential
  - Provide a copy of the Incident Potential to the Business Support Team (BST)
  - Assist IC in analyzing results of size up process and in identifying Section-specific problems that need to be addressed by Strategic Objectives
- ☐ Facilitate preparation and distribution of Incident Action Plans
  - Work with IC or Deputy IC to define next operational period (NOP) duration
  - Ensure field assignments fully address Objectives for NOP
  - Ensure that environmental and safety reviews are performed on field assignments for NOP
- ☐ Facilitate preparation and distribution of General Plan and any other incident specific plans, reports, or other required documents
- ☐ Facilitate collection and posting of incident nature/status updates and response operations in the Information Center. Ensure same information is elevated to the BST via the IC.
- ☐ Advise IC on all environmental aspects of source control and response operations, and ensure compliance with environmental laws, regulations, and/or government directives
- ☐ Facilitate collection and retention of appropriate documentation
- ☐ Ensure technical specialists are checked in and assigned to appropriate Units within IMT/TRT
- ☐ Provide Information and Liaison Officers with accurate, up-to-date information on response operations, including:
  - Location, fate and effects of emitted/discharged materials
  - Weather and other conditions
  - Environmentally sensitive areas, wildlife affected by incident, and/or status of protection efforts
- ☐ Assist Information and Liaison Officers in responding to requests for information from media, government agencies, and other external parties

TECHNICAL SPECIALIST

The Technical Specialists are advisors, primarily within the Planning Section, with special skills needed to support the incident. Technical Specialists may be assigned anywhere in the ICS Organization. If necessary, Technical Specialists may be formed into a separate Unit. The Planning Section will maintain a list of available Specialists and will assign them where needed. The following are example positions for Technical Specialists that might be utilized during an oil spill response:

- Legal Specialists
- Scientific Support Coordinator Specialists
- Sampling Specialist
- Disposal (Waste Management) Specialists
- Alternative Response Technologies (ART) Specialist

SITUATION UNIT LEADER

Responsible for gathering and displaying incident nature/status and incident response operations information, for preparing Situation Status Reports, and for preparing situation projections in support of short and long-term planning efforts.

☐ Work with Resource Unit to establish and maintain Information Center:

- Receive Incident Name, operational periods, initial and, if necessary, updated Strategic Objectives from Incident Commander
- Receive initial and, if necessary, updated Incident Facts related to:
  - Description of incident, description of spilled/emitted material, source, status of source control operations, status of incident, response operations, and impacts from Operations Section Chief
  - Weather, tides, sunrise/sunset and sensitive areas from Planning Section Chief or Environmental Unit Leader
  - Safety considerations and information on safety and health considerations from Safety Officer and Health and Safety Unit
  - Updated meetings schedule from Deputy IC or Planning Section Chief
- Obtain appropriate chart(s), map(s), plot plan(s) for use as Situation Map
- Receive following Situation Map from Operations Section Chief:
  - Location of source(s), spilled/emitted material(s)
  - Location of Tactical Command Post (TCP), staging area(s)
  - Location of Isolation Perimeter with secured access point(s)
  - Location of Branches, Divisions, Groups, if created
  - Location of tasks
  - Wind and current speed and direction, if applicable

☐ Prepare projections of situation

☐ Update Situation Map and Status Boards in Information Center before Briefings,

Assessment Meetings; if requested, record Action Items identified during meetings

- ☐ Work with Resources Unit to prepare ICS 209 Situation Status Reports and provide them to IC for transmission to Business Support Team (BST)
- ☐ Assist in preparing Incident Action Plans (IAP); keep Planning Section Chief or Plan Development Unit apprised of any changes which may affect IAP content;
    - Weather conditions for NOP
    - Ongoing tactical response operations
    - Projected movements of spilled/emitted material(s) during NOP
    - Mass balance projections for NOP
- ☐ Assist in compilation of General Plan; Provide following information to Planning Section Chief or Plan Development Unit:
    - Long-range weather forecast
    - Long-range trajectory analysis
    - Long-range mass balance analysis
- ☐ Track status of incident-specific plans
- ☐ If approved by Planning Section Chief and Operations Section Chief, send observers to field to provide situational updates

LOGISTICS SECTION CHIEF

Responsible for obtaining the personnel, equipment, materials, and supplies needed to mount and sustain incident response operations, and for providing the services necessary to ensure incident response operations are carried out in a safe and efficient fashion.

- ☐ Work with Incident Commander (IC) and Section Chiefs to identify and ensure timely and efficient provision of support services:
    - Food, water, sanitation, and shelter
    - Incident facilities
    - Transportation
    - Communications systems
    - Medical & security services
    - Others, as necessary
- ☐ Ensure that logistics support and service needs are met in a timely and efficient fashion, and in a manner that maximizes personnel safety and efficiency of response operations
- ☐ Ensure that guidelines, procedures, forms, and data management systems necessary to manage acquisition of response resources and control inventory are followed by Logistics Section personnel
- ☐ Work with Finance Section Chief to institute requisition procedure
- ☐ Provide Finance Section Chief with copy of all Purchase Orders
- ☐ Ensure that an overall inventory management system is maintained of all equipment, materials, and supplies purchased, rented, borrowed, or otherwise obtained during

incident response operations

- ☐ Ensure that records are maintained on equipment and services provided and contracts executed during incident response operations
- ☐ Provide Planning Section Chief or Resource Unit with up-to-date information on destination and ETA of all equipment and personnel resources obtained for response operations
- ☐ Assist Planning Section Chief or Plan Development Units in preparation of Incident Action Plans and General Plan by reviewing draft Field Assignments
- ☐ Provide Operations Section Chief with recommendations on timing of release of logistics services and support personnel and equipment
- ☐ Notify Deputy Incident Commander if Logistics Section cannot address (an) unmet resource need(s)

FINANCE SECTION CHIEF

Responsible for managing and supervising all financial and administrative aspects of incident response operations, including: accounting, invoice processing, contracts, cost control, insurance coordination, and financial reporting.

- ☐ Work with Logistics Section Chief to institute a requisition procedure
- ☐ Prepare short and long-term cost information for Incident Commander
- ☐ Work with Law Officer on issues regarding insurance coverage and exclusions, claims management processing, and approach to settlements
- ☐ Facilitate preparation and distribution of guidelines, procedures, forms, and establishment of a data management system necessary to account for expenditures made during incident response operations
- ☐ Review all relevant insurance programs and ensure notification of insurers and appointment of loss adjusters
- ☐ Ensure that appropriate cost and accounting control systems are established
- ☐ Ensure that an expenditure tracking system is utilized and kept current
- ☐ Provide adequate accounting systems, including: auditing, billing, and documenting labor, material, and services used
- ☐ Oversee administration of vendor contracts, and service and equipment rental agreements
- ☐ Ensure that adequate pool of personnel is retained and compensated
- ☐ Provide direct human resources services to response personnel and their families

SECTION 5 Last revised: July 2012

INCIDENT PLANNING

5.1 DOCUMENTATION PROCEDURES

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

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

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

5.2 ICS FORMS

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

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

- **BP INITIAL PLAN OF ACTION (IPA)**

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

  The IPA consists of the following ICS forms:

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

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

  - **INCIDENT ACTION PLAN (IAP) EXECUTIVE SUMMARY**

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

  - **OBJECTIVES FOR GENERAL PLAN**

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

activities.

- **OBJECTIVES - ICS 202**

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

- **ORGANIZATION ASSIGNMENT LIST - ICS 203**

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

- **FIELD ASSIGNMENT CHANGE SHEET - ICS 204**

  Submits assignments at the level of Division and Groups.

- **FIELD ASSIGNMENT - ICS 204a**

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

5.2 ICS FORMS, CONTINUED

- **COMMUNICATIONS PLAN - ICS 205**

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

- **MEDICAL PLAN - ICS 206**

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

- **CHECK-IN LIST (EQUIPMENT / PERSONNEL) - ICS 211**

  This form is used for equipment and personnel check in only. Equipment arriving at the incident can be checked in at various incident locations. Personnel arriving at the incident can check in at various incident locations.

In addition, these Incident Command System (ICS) forms may be found on the U.S. Coast Guard web page: http://www.uscg.mil/ccs/cit/cim/forms1/form_ics.html.

5.2.1 Incident Briefing Form - ICS 201 (Initial Report Only)

1. Incident Name:	

2. Date / Time Prepared / Updated: _____

3. Map Sketch

⊗	Source	▬	Boundary of Isolation Perimeter	⊕	First Aid Station
T	Tactical Command Post	TTTTT	Boundary of Hot Zone	(T)	Task
(S)	Staging Area(s)	//////	Location of Warm Zone	W / 10kts C / .5kts	Wind and Current Speed and Direction

Staging Area(s)

S1 _____
S2 _____
S3 _____
S4 _____
S5

Tasks

T1 _____
T2 _____
T3 _____
T4 _____
T5

Weather

Wind direction/Speed _____
Temp _____
Precipitation _____
Tides _____
Sunrise/Set

Prepared by: _____ **Contact**

Phone _____

Radio _____

5.2.1 Incident Briefing Form - ICS 201 (Initial Report Only), Continued

SUMMARY OF INCIDENT AND CURRENT ACTIONS
INCIDENT BRIEFING ICS 201-2 (pg 2 of 6)

Incident Name:	**Date Prepared:**
Incident Location:	**Time Prepared:**

DESCRIPTION OF INCIDENT:

Date/Time: _____

What Happened: ☐ Fire ☐ Gas Leak ☐ Explosion ☐ Spill ☐ Medical ☐ HAZMAT ☐ Other

Extent of Impact: _____

Source: _____ Name/Type: _____

DESCRIPTION OF SPILLED/ EMITTED MATERIAL:

Type: _____ **Quantity:** _____

INCIDENT POTENTIAL:

☐ Incident Under Control.

☐ Incident currently not under control, but can be handled with available resources.

☐ Incident not under control and will require additional resources (e.g., contractors, mutual aid).

☐ Incident will likely generate significant public affairs/community relations issues.

SAFETY CONSIDERATIONS:

Injuries: _____ Fatalities: _____ Missing: _____

Chemical Hazards: _____

Physical Hazards: _____

Required PPE Level: _____

RESPONSE: GENERAL

PROBLEMS	SOLUTIONS

IMPACTS: ☐ Land ☐ People ☐ Property ☐ Environment ☐ Water ☐ Community

RESPONSE OBJECTIVES (MARK APPLICABLE):

☐ Ensure Safety of all responders and the Community from Incident Hazards

☐ Gain and maintain control over incident source (spill, fire, etc.)

☐ Minimize spread of spill or emitted materials

☐ Clean up impacted areas in an environmentally sound fashion (Spill, storm debris, etc.)

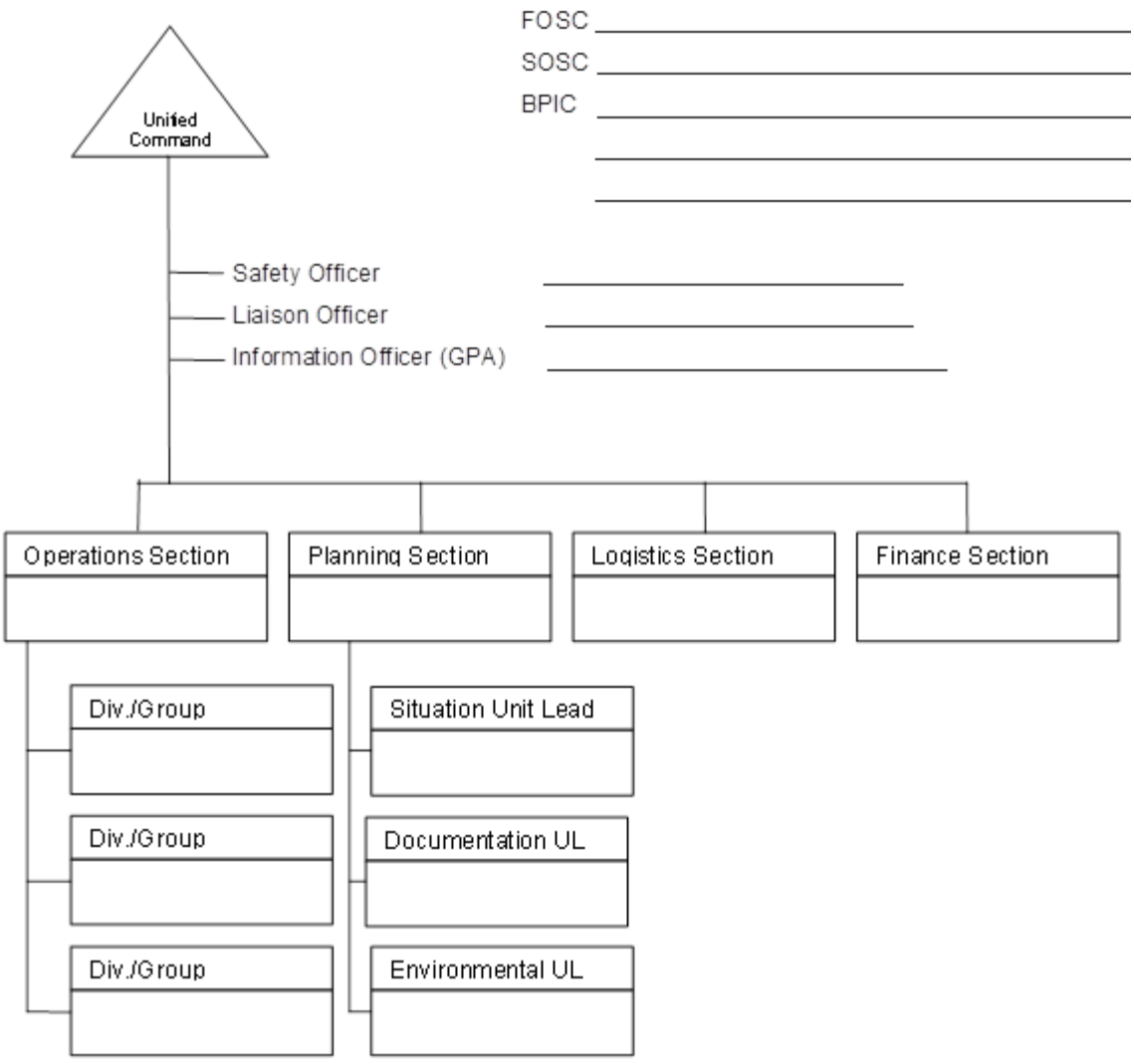
☐ Keep Internal and external stakeholders informed (Public, Leadership, agencies, etc.)

☐ Other		
Prepared By:	**ICS Position:**	**Phone:**

5.2.1 Incident Briefing Form - ICS 201 (Initial Report Only), Continued

1. Incident Name	**2. Prepared by** (name) Date: Time:	INCIDENT BRIEFING

3. Current Organization



INCIDENT BRIEFING	August 2012	ICS 201-3 (pg 3 of 6)

5.2.1 Incident Briefing Form - ICS 201 (Initial Report Only), Continued

Incident Name/Date Prepared:
_____

RESOURCE SUMMARY INCIDENT
BRIEFING ICS 201-4 (pg 4 of 6)

Resources (People and equipment)	Have (Place time in column)			Need	Destination / Location / Assignment
	En Route (ETA)	Staged/ Available	Assigned		

The responses indicated on this worksheet reflect the preliminary views of the person filling out the worksheet based on the information available and known to that person as of the date and time shown and, as such, are subject to modification as additional information is obtained.

5.2.1 Incident Briefing Form - ICS 201 (Initial Report Only), Continued

SITE SAFETY AND CONTROLS	INCIDENT BRIEFING ICS 201-5 (pg 5 of 6)
	Date Prepared:
Incident Location:	**Time Prepared:**

Site Control

Has an on-scene Safety Officer been designated?		☐ Yes	☐ No	
Has an Incident Command Post been established?		☐ Yes	☐ No	
Have all personnel been accounted for? Injuries: __ Fatalities: __ Unaccounted: __		☐ Yes	☐ No	
Are people injured or trapped? (Attach Company Injury/Incident Report, as appropriate)		☐ Yes	☐ No	
Are untrained/unorganized people on-scene or involved in rescue operations?		☐ Yes	☐ No	
Has an Isolation Perimeter been established?		☐ Yes	☐ No	
Has a Staging Area been established?		☐ Yes	☐ No	
Has Site Access Control been established?		☐ Yes	☐ No	

Hazards

Have you determined the need for:

Air monitoring		☐ Yes	☐ No	
Onsite characterization		☐ Yes	☐ No	
Offsite characterization		☐ Yes	☐ No	

Are there immediate signs of potential hazards:

Markings, colors, placards, or labels indicating hazards?		☐ Yes	☐ No	
Unidentified liquid or solid products visible?		☐ Yes	☐ No	
Vapors visible? Color: _____		☐ Yes	☐ No	
Odors or smells?		☐ Yes	☐ No	
Spill area conditions:	☐ Dry	☐ Wet	☐ Icy	
Electrical lines down?		☐ Yes	☐ No	
Ignition sources nearby (sparks, flames, vehicles)?		☐ Yes	☐ No	
Physical hazards (holes, caverns, deep ditches, fast-moving water) nearby?		☐ Yes	☐ No	
Is local traffic a potential problem?		☐ Yes	☐ No	
As you approach the scene from the upwind side, are there changes in status of any of the above?		☐ Yes	☐ No	

Hazards Mitigation

Are TRT units safely positioned? Emergency escape route provided (see below)?	☐ Yes	☐ No
Have you established and communicated the location of Hazard Control Zones?	☐ Yes	☐ No
Have you identified PPE requirements and levels? A: ___ B: ___ C: ___ D: ___	☐ Yes	☐ No
Have you identified other safety equipment and procedures (see below)?	☐ Yes	☐ No
Are all entry operations following the "Two in / Two Out" guidelines?	☐ Yes	☐ No
Have you established EMS / Medical Stations?	☐ Yes	☐ No
Have you defined decontamination requirements (see below)?	☐ Yes	☐ No
Have you established decontamination facilities?	☐ Yes	☐ No

Remarks (list Emergency Escape Routes, Decon Requirements, Equipment, etc., as appropriate):

Prepared By:			**Approved By:**
Site Safety Officer	Date	Time	Incident Commander

5.2.1 Incident Briefing Form - ICS 201 (Initial Report Only), Continued

1. Incident Name	**2. Prepared by** (name) Date: Time:	INCIDENT BRIEFING

Summary of Current Actions

Time	Action/Note

INCIDENT BRIEFING	August 2012	ICS 201-6 (pg 6 of 6)

5.2.2 BP Initial Plan of Action (IPA)

General Information			
Incident Name:		**Incident Date / Time:**	
Prepared by:	**Phone:**	**Date / Time Prepared:**	
Incident location:	**Area/block:**	**Lat.**	**Long.**
Description of Incident:			

Status of Source:
Status of Source Control Operations (including relief well planning, material procurement, and rig availability):
Spilled/Emitted Material (what, how much, location, predicted landfall - where, when):

On-scene Atmospheric and Oceanic Conditions:				
Wind Speed:	Wind Direction from:	Air temp:	Visibility:	Precipitation:
Sea Height:	Current Speed:	Current Direction:	Water Temp.:	Other:

Status of People (deaths, injuries, missing, evacuated, etc.):
Safety Considerations:
Locations of IMT EOC, TRT ICP, etc.:
Status of Unified Command (including integration of other responding organizations into IMT):

5.2.2 BP Initial Plan of Action (IPA), Continued

Status of Notifications			
Agency	**Contacted by**	**Time**	**Name of agency contact person**
National Response Center			
EPA			

Summary of Response Operations (including efforts to identify and protect sensitive areas):			
Status of Response Equipment:			
Number:	Type:	☐ Enroute	☐ Assigned
		☐ Staged	☐ Out-of-Service
Status of Efforts to Identify and Protect Sensitive Areas:			

5.2.3 Incident Action Plan (IAP) Table of Contents

1. Contents		**2. Page No.**
	Cover Page	
	Executive Summary	
	Incident Action Plan Objectives (ICS 202)	
	Organization Assignment List (ICS 203)	
	Field Assignments (ICS 204)	

	Radio Communications Plan (ICS 205)	
	Medical Emergency Plan (ICS 206)	
	Air Operations Plan (ICS 220)	
	Slick Location, Trajectory, Response Resource Map	
	Other Contents	

5.2.4 Incident Action Plan (IAP) Cover Sheet

1. Incident Name:			
2. Date Prepared:			
3. Operational Period Covered By Plan:			
State Time/Date:	**End Time/Date:**		
4. Approved By:			
5. Weather Forecast for Operational Period			
Wind Speed:	**Wind Direction:**		
Air Temperature:	**Precipitation:**	**Rain**	**Snow**
Ceiling:	**Visibility:**		
Wave Height	**Wave Direction:**		
Current Speed:	**Current Direction:**		
Water Temperature:	**River Stage:**		
Narrative Description of Weather Forecast:			

6. Tides, Sunrise, Sunset						
	Time	Level	Time	Level		Time
High Tide(s)		( )		( )	Sunrise:	
Low Tide(s)		( )		( )	Sunset:	

5.2.5 Incident Action Plan (IAP) Executive Summary

1. Incident Name:	
2. Operational Period:	
State Time/Date:	End Time/Date:
3. Incident Commander(s) for NOP:	
4. Objectives for the NOP	
Objective Nos.	How IAP Addresses Objectives
5. Summary of Major Changes for the NOP	

5.2.6 Objectives for General Plan

1. Incident Name:	
2. Objectives	
No.	**Objectives**
4. Approved By:	

5.2.7 Objectives - ICS 202

1. Incident Name:	
2.Operational Period:	
Start Time/Date:	**End Time/Date:**
3. Objectives	

No.	Objectives

4.Approved by:

5.2.8 Organization Assignment List - ICS 203

1. Incident Name:

2. Operational Period Covered by Plan:					
Start Time/Date:			**End Time/Date:**		
3. Command Section:		**4. Operations Section:**			
Incident Commander		Chief			
Unified Commanders		On-scene Commander			
Deputy		Site Safety Officer			
Safety Officer		Staging Area Manager			
Information Officer		Air Operations Manager			
Liaison Officer		Aide			
Law Officer		**a. Branch I:**			
Human Resources Officer		Director			
Security Officer		Division/Group			
5. Planning Section:		Division/Group			
Chief		Division/Group			
Resource Unit		Division/Group			
Situation Unit		**b. Branch II:**			
Documentation Unit		Director			
Demobilization Unit		Division/Group			
Health & Safety Unit		Division/Group			
Environmental Unit		Division/Group			
Technical Specialists		Division/Group			
6. Logistics Section:		**c. Branch III:**			
Chief		Director			
Service Branch		Division/Group			
Communications Unit		Division/Group			
Medical Unit		Division/Group			
Food Unit		Division/Group			
Support Branch		**d. Branch IV:**			
Supply Unit		Division/Group			
Facilities Unit		Division/Group			
Security Unit		Division/Group			
Transportation Unit		Division/Group			
7. Finance Section:		Division/Group			
Chief		**e. Branch V:**			
Time Unit		Director			
Procurement Unit		Division/Group			
Compensation/Claims Unit		Division/Group			

Cost Unit		Division/Group		
		Division/Group		

5.2.9 Field Assignment Change Sheet - ICS 204

1. Incident Name:		**2. Field Assignment No.**	
3. Change Number:	**Change Date:**	**Change Time:**	
4. Status of Change:	**Draft**	**Final**	
5. Contact Person:		**Position:**	
6. Portion(s) of Assignment Changed			
☐ Operational Period		☐ Team Leader	
☐ Task		☐ Number of Personnel	
☐ Division or Group Designation		☐ Schedule	
☐ Objective		☐ Safety Message	
☐ Description of Work		☐ Environmental Message	
☐ Management		☐ Diagram or Map	
☐ Equipment			
Description of Change(s)			
7. Approved by:		**Time/Date:**	

5.2.10 Field Assignment - ICS 204a

1. Incident Name:		**2. Field Assignment No.:**	
3. Status of Assignment:	Draft		Final
4. Operational Period:	Current		Next
Start Time/Date		**End Time/Date**	
5. Task:		**6. Division/Group:**	
7. Objective:			
8. Description of Work:			
			9. Diagram: ☐ Yes ☐ No
10. Management			

Position	Person	Communications
Section Chief		
Branch Director		
Division/Group Supervisor		
Task Leader		

11. Resources

Qty.	Single Resource/Strike Team/Task Force	Leader	No. of Personnel

12. Schedule:	**Start Time:**	**Finish Time:**
13. Attachments:	☐ Change Sheet	☐ Environmental Message
	☐ Safety Message	☐ Other (Specify)
14. Approved by:		**Time/Date:**

5.2.11 Communications Plan - ICS 205

1. Incident Name:				
2. Operational Period Covered by Plan:				
Start Time/Date:			**End Time/Date:**	
3. Command Network				
Source	**Frequency**	**Channel**	**Phone/Fax No.**	**Assignment**
4. Tactical Network				
Source	**Frequency**	**Channel**	**Phone/Fax No.**	**Assignment**
5. Supply Network				
Source	**Frequency**	**Channel**	**Phone/Fax No.**	**Assignment**
6. Other Networks (e.g., Source Control, Crisis, etc.)				
Source	**Frequency**	**Channel**	**Phone/Fax No.**	**Assignment**
7. Approved by:			**Time/Date:**	

5.2.12 Medical Plan - ICS 206

1. Incident Name:	
2. Operational Period Covered by Plan:	
Start Time/Date:	**End Time/Date:**

3. First Aid Station(s)

Location	Division/Group(s) Served	Radio/Phone

4. Ground Ambulance Service(s)

Location	Division/Group(s) Served	Radio/Phone

5. Air Ambulance Service(s)

Location	Division/Group(s) Served	Radio/Phone

6. Hospitals and Treatment Facilities

Location	Division/Group(s) Served	Radio/Phone

7. Summary of Medical Emergency Procedures	
8. Approved by:	**Time/Date:**

5.2.13 Check-In List (Equipment / Personnel) - ICS 211

1. Incident Name:						
2. Check-In Location:						
3. Time/Date Of Report:						
4. Recording Person:						
5. Equipment		**6. Personnel**		**7. Time/ Date In**	**8. Time/ Date Out**	**9. Comments**
Qty	**Kind/Type**	**Qty**	**Category**			

5.3 SITE SAFETY AND HEALTH PLAN

1. PROJECT OBJECTIVE			

Prepared by:		Date:	
Overall Objective of Project:			

2. SITE DESCRIPTION

Date:		Sector:	
Business Unit:			
Name of Facility:			
Location (Road, City):			

Potential Hazards (Y / N):				
		Excavations, Trenches, and/or Confined Spaces		
		Hazardous Vapors and Gases		
		Direct Exposure to Hazardous Material		
		Dust and Particulates		
		Environmental Hazards (Rain, Snow, Cold, Heat)		
		Equipment Hazards		
		Other:		
		Other:		
		Other:		

Area Affected: (Describe the area including approximate dimensions. Attach Site Map)			
Surrounding Population (Y/N):			
		Urban	
		Suburban	
		Rural	
		Industrial	
Distance to Nearest Population:			

5.3 SITE SAFETY AND HEALTH PLAN, CONTINUED

Topography: (Describe terrain)	

sandy beach	rocky	cliffs	marshes	docks	other (explain)

Climate/Weather Conditions:		
	Present	Anticipated
Winds		
Temp °F		
Humidity		
% Rain		
Seas		
Comments		

3. BACKGROUND INFORMATION

Background information: (Include date, range of site use, source of contamination, estimated extent of contamination, known and suspected contaminants, etc.)

4. ENTRY OBJECTIVES

Entry Objectives: (Fully describe the purpose of site visit(s). If multiple visits, indicate the objectives of each entry. The number and types of samples should be included if sampling is to be performed). All work shall be conducted in accordance with procedures established during pre-entry briefings and attached work plans. A work plan is attached as Item 10.

5.3 SITE SAFETY AND HEALTH PLAN, CONTINUED

5. PERSONNEL ROLES	
BP Pipelines, N.A. Personnel:	
Key Personnel	Title / Responsibilities
	On-Scene Commander (OSC)
	Site Safety & Health Plan Officer (SSO)
	Contractor Supervisor (CS)
	GPA

Federal Agency Representatives:		
Name	Agency	Phone

State Agency Representatives:		
Name	Agency	Phone

Local Agency Representatives:		
Name	Agency	Phone

(b) (7)(F)

(b) (7)(F)

[redacted]

5.3 SITE SAFETY AND HEALTH PLAN, CONTINUED

7. HAZARD EVALUATION

The following substance(s) are known to be on-site. The primary hazards of each are identified.

Product	Physical State [1]	Waste Characteristics [2]	Primary Hazard [3]

1. Liquid, solid, sludge, gas/vapor, other.

2. Corrosive, flammable, toxic, volatile, reactive, radioactive, carcinogen, other.

3. Toxic on inhalation or ingestion absorbed through skin, irritant to eyes, irritant to respiratory tract, irritant to skin, other.

Anticipated concentration and allowable exposure limits

Product	Anticipated Concentration	Full-Shift Exposure Limit	Short-Term Exposure Limit

NOTE: Include institution that establishes limit (e.g., OSHA, ACGIH, etc.).

Other Site Hazards (Y / N):	

		Heat	
		Cold	
		Confined Spaces	
		Heavy Equipment	
		Overhead / Underground Utilities	
		Bloodborne Pathogens	
		Poison Ivy	
		Insects:	
		Rodents:	
		Snakes:	
		Lighting:	
		Work Near Water:	
		Electrical Hazards:	
		Helicopters:	
		ATV's:	
		Others:	
		Others:	
		Others:	

5.3 SITE SAFETY AND HEALTH PLAN, CONTINUED

8. PERSONAL PROTECTIVE EQUIPMENT		
Based on evaluation of potential hazards, the following levels of personal protection have been designated for the applicable work areas and tasks. See Health Hazard Information section on MSDS of product.		
Location	Job Function	Level of Protection
NOTE: Air monitoring equipment will be used to determine the need for appropriate PPE.		
PPE - Levels of protection: Level A: To be selected when the greatest level of skin, respiratory, and eye protection is required. Level B: The highest level of respiratory protection is necessary, but a lesser level of skin protection is needed. Level C: The concentration(s) and type(s) of airborne substance(s) is known and the criteria for using air purifying respirators are met. Level D: A work uniform affording minimal protection, used for nuisance contamination only.		
Specific protective equipment for each level of protection is as follows:		
NOTE: No changes to the specified levels of protection shall be made without the approval of the Clean-Up Leader and Site Safety Officer.		

5.3 SITE SAFETY AND HEALTH PLAN, CONTINUED

9. ENVIRONMENTAL MONITORING
A direct reading instrument will be used to monitor organic vapor concentration. The instrument will be on while the workers approach the work area and readings will be taken during the following conditions: • Possibility of IDLH or flammable atmosphere has developed. • Indication that exposures may have risen over limits since prior monitoring. • Work begins on different portion of site. • Contaminants other than those previously identified are being handled. • Different type of operation is initiated. • Employees are handling leaking drums or containers. • Employees are working in areas with obvious liquid contamination.
If at any time a measurement of____ ppm or more above concentration is observed, the workers will retreat to a safe area and upgrade the level of protection to level ____. Monitoring will be continuous during times of respirator usage. If at any time the concentration approaches ____ ppm greater than background, the work area will be evacuated immediately.

Combustible Gas Monitoring will be conducted by:	
Instrument(s) used will be:	
Calibration Frequency:	
Frequency of Monitoring:	
Location of Monitoring:	
Benzene/Xylene/Toluene monitoring will be conducted by:	
Instrument(s) used will be:	
Calibration Frequency:	
Frequency of Monitoring:	
Location of Monitoring:	
Other monitoring will be conducted by:	
Instrument(s) used will be:	

Calibration Frequency:	
Frequency of Monitoring:	
Location of Monitoring:	
NOTE: Monitoring results are attached to this report.	

5.3 SITE SAFETY AND HEALTH PLAN, CONTINUED

10. ON-SITE WORK PLANS	
The field team will perform the following tasks:	
Team Member	Function

11. SPECIAL INSTRUCTIONS

12. COMMUNICATION PROCEDURES				
The following emergency signal indicates that there is an emergency situation:				
		Horn blasts		
		Siren		
		Alarm		
		Whistle		
		Other:		

In addition, the following standard hand signals will be used in case of failure of audible communications:

- Hand gripping throat Þ Out of air, can't breathe
- Grip partner's wrist or both Þ Leave area immediately hands around waist
- Hands on top of head Þ Need assistance
- Thumbs up Þ OK, I understand

- Thumbs down Þ No, negative

13. DECONTAMINATION PROCEDURES
Personnel and equipment leaving the work area shall be thoroughly decontaminated. Soiled boots and clothing will be removed before entering transport vehicle. Disposable items (e.g., gloves, rags) will be disposed of on-site in a manner consistent with facility operatives / work plan.
If non-disposable items will be used on-site, then describe decon procedure:

5.3 SITE SAFETY AND HEALTH PLAN, CONTINUED

14. EMERGENCY PROCEDURES
The following standard emergency procedure will be used by on-site personnel: The Site Safety Officer shall be notified of any on-site emergencies and will be responsible for ensuring that the appropriate procedures are followed: Personnel injury in the Support Zone - Upon notification of an injury in the support zone, the Clean-Up Unit Leader and Site Safety Officer will assess the nature of the injury. If the cause of the injury or loss of the injured person does not affect the performance of site personnel, operations may continue, with the Clean-Up Unit Leader and Site Safety Officer initiating the appropriate first aid and necessary follow-up as stated above. If the injury increases the risk to others, all site personnel shall be assembled in a given area for further instructions. Activities on-site will stop until the added risk is removed or minimized. Fire/Explosion - Upon notification of a fire or explosion on-site, all site personnel will be assembled at the decontamination line. The fire department shall be alerted and all personnel moved to a safe distance from the involved area. Personal Protective Equipment Failure - If any worker experiences a failure or alteration of protective equipment that affects the protection factor, that person and his/her buddy shall immediately leave the affected area. Reentry shall not be permitted until the equipment has been repaired or replaced. Other Equipment Failure - If any other equipment on-site fails to operate properly, the Clean-Up Unit Leader and Site Safety Officer shall be notified and then determine the effect of this failure on continuing operations on site. If the failure affects the safety of personnel or prevents completion of the Work Plan tasks, all personnel shall leave the area until the situation is evaluated and appropriate actions taken.
IN ALL SITUATIONS, WHEN AN ON-SITE EMERGENCY RESULTS IN EVACUATION OF THE WORK AREA, PERSONNEL SHALL NOT REENTER UNTIL: 1. The conditions resulting in the emergency have been corrected. 2. The hazards have been reassessed.

3. The Site Safety Plan has been reviewed. 4. Site personnel have been briefed on any change in the Site Safety Plan.
An exit route will be used in an emergency restricting the use of the main entrance. Location of the Emergency Exit Route (See Site Map):
In the event of an accidental release, fire or explosion or the sounding of the emergency signal, workers will evacuate the work area and assemble in the designated location. Location of Designated Assembly Area (See Site Map):

5.3 SITE SAFETY AND HEALTH PLAN, CONTINUED

15. SITE SAFETY PLAN			
Site Safety Officer(s):			
The Site Safety Officer is directly responsible for safety recommendations on site. He/She will maintain daily site logs documenting all notable events and/or conditions of health and safety concerns.			
Emergency Medical Care:			
	Qualified Medical personnel are located on site (Y/N):		
	If there are qualified Medical personnel located on-site, then identify location (See Site Map):		
	Phone Number:		
	Radio Frequency:		
Medical Surveillance:			
In accordance with 29 CFR 1910.120 (f), the employees/contractors involved in this project have been examined by a physician trained in occupational medicine, for the purpose of determining fitness with respect to handling hazardous materials and wearing personal protective equipment. The results of the examination indicate that these employees/contractors are physically capable and qualified to work under conditions described in this plan, without risk to personal health and safety.			
Emergency Resources:			
	Command Post: Phone Number:		
	Safety Officer: Phone Number:	_____	

	Fax:	_____	
	Cellular:	_____	
	Pager:	_____	
	Home:	_____	

NOTE: Telephone communication to the Command Post should be established as soon as practical.

	Site Resources:		
	Telephone	Y/N	Comments
	Radio		
	Electricity		
	Illumination		
	Sanitation		
	Water Supply		
	Water Supply		
	Designated First Aid/CPR On-Site Provider		
	Other:		
	Other		

5.3 SITE SAFETY AND HEALTH PLAN, CONTINUED

15. SITE SAFETY PLAN, CONTINUED		
	Local Resources:	
		Phone Number
	Ambulance	
	Hospital Emergency Room	
	Sheriff	
	Police	
	State Police	
	Fire Department	
	Airport/Helicopter	
	EPA Contact	
	U. S. Coast Guard Contact	
	M.M.S. Contact	
	Claims	
	Other:	
	Other:	

Emergency Medical Information For Substances Present:			
	Substance	Exposure Symptoms	First-Aid

16. TRAINING CERTIFICATION
The Site Safety Officer will ensure that all employees have the appropriate training/certification as per 29 CFR 1910.120 (8) (e).

5.4 DECONTAMINATION PLAN

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

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

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

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

- Decontamination Stations:

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

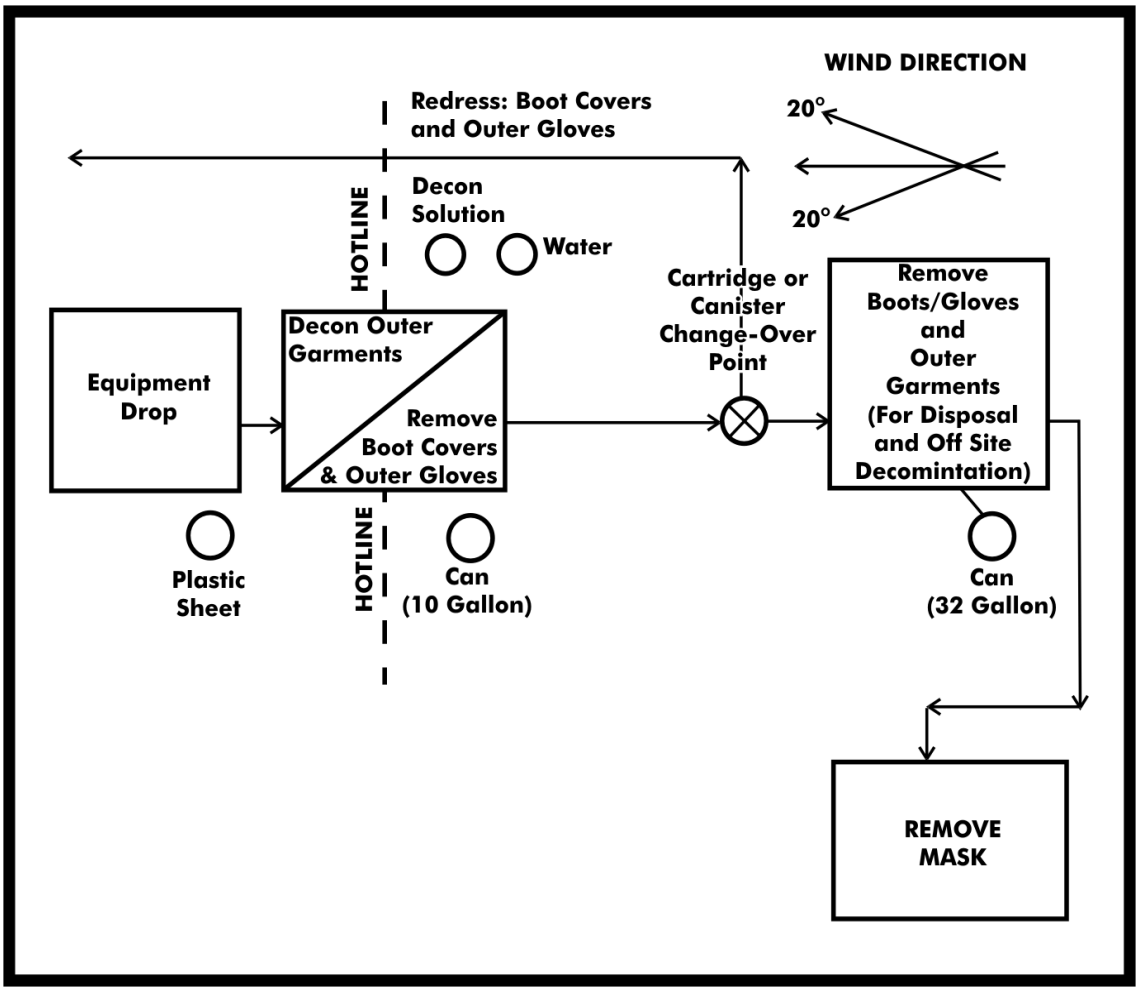
5.4 DECONTAMINATION PLAN, CONTINUED

MINIMUM MEASURES FOR DECONTAMINATION		
STATION 1	Equipment drop	Deposit equipment used on site (tools, sampling devices and containers, monitoring instruments, radios, clipboards, etc.) on plastic drop cloths. Segregation at the drop reduces the probability of cross contamination. During hot weather operations, a cool down station may be set up

		within this area.
STATION 2	Outer garment, boots and gloves wash and rinse	Scrub outer boots, outer gloves, and splash suit with decontamination solution or detergent and water. Rinse off using copious amounts of water.
STATION 3	Outer boot and glove removal	Remove outer boots and gloves. Deposit in container with plastic liner.
STATION 4	Canister or mask change	If worker leaves exclusion zone to change canister (or mask) or this is the last step in the decontamination procedures; worker's canister is exchanged, new outer gloves and boot covers are donned, joints are taped, the worker returns to duty.
STATION 5	Boot, gloves, and outer garment removal	Boots, chemical-resistant splash suit, inner gloves removed and deposited in separate containers lined with plastic.
STATION 6	Face piece removal	Face piece is removed. Avoid touching face with fingers. Face piece deposited on plastic sheet.
STATION 7	Field wash	Hands and face are thoroughly washed. Shower as soon as possible.

5.4 DECONTAMINATION PLAN, CONTINUED

DECONTAMINATION PROCEDURES, MINIMUM DECONTAMINATION LAYOUT



5.4 DECONTAMINATION PLAN, CONTINUED

Procedures for these stations are as follows:

MAXIMUM MEASURES FOR DECONTAMINATION		
STATION 1	Segregated equipment drop	Deposit equipment used on site (tools, sampling devices and containers, monitoring instruments, radios, clipboards, etc.) on plastic drop cloths or in different containers with plastic liners. Segregation at the drop reduces the probability of cross contamination. During hot weather operations, a cool down station may be set up within this area.
STATION 2	Boot cover and glove wash	Scrub outer boot cover and gloves with decontamination solution or detergent and water.
STATION 3	Boot cover and glove rinse	Rinse off decontamination solution from Station 2 using copious amounts of water.
STATION 4	Tape removal	Remove tape around boots and gloves and deposit in container with plastic liner.
STATION 5	Boot cover removal	Remove boot covers and deposit in containers with plastic liner.

STATION 6	Outer glove removal	Remove outer gloves and deposit in container with plastic liner.
STATION 7	Suit and boot wash	Wash splash suit, gloves, and safety boots. Scrub with long-handled scrub brush and decontamination solution.
STATION 8	Suit and boot and glove rinse	Rinse off decontamination solution using water. Repeat as many times as necessary.
STATION 9	Canister or mask change	If worker leaves exclusion zone to change canister or this is the last step in the decontamination procedure; worker?s canister is exchanged, new outer gloves and boot covers are donned, joints are taped, and the worker returns to duty.
STATION 10	Safety boot removal	Remove safety boots and deposit in container with plastic liner.
STATION 11	Splash suit removal	With assistance of helper, remove splash suit. Deposit in container with plastic liner.
STATION 12	Inner glove wash	Wash inner gloves with decontamination solution.
STATION 13	Inner glove rinse	Rinse inner gloves with water.
STATION 14	Face piece removal	Remove face piece. Deposit in container with plastic liner. Avoid touching face with fingers.
STATION 15	Inner glove removal	Remove inner gloves and deposit in lined container.
STATION 16	Inner clothing removal	Remove clothing soaked with perspiration and place in lined container. Do not wear inner clothing off-site since there is a possibility that small amounts of contamination might have been transferred in removing the protective suit.

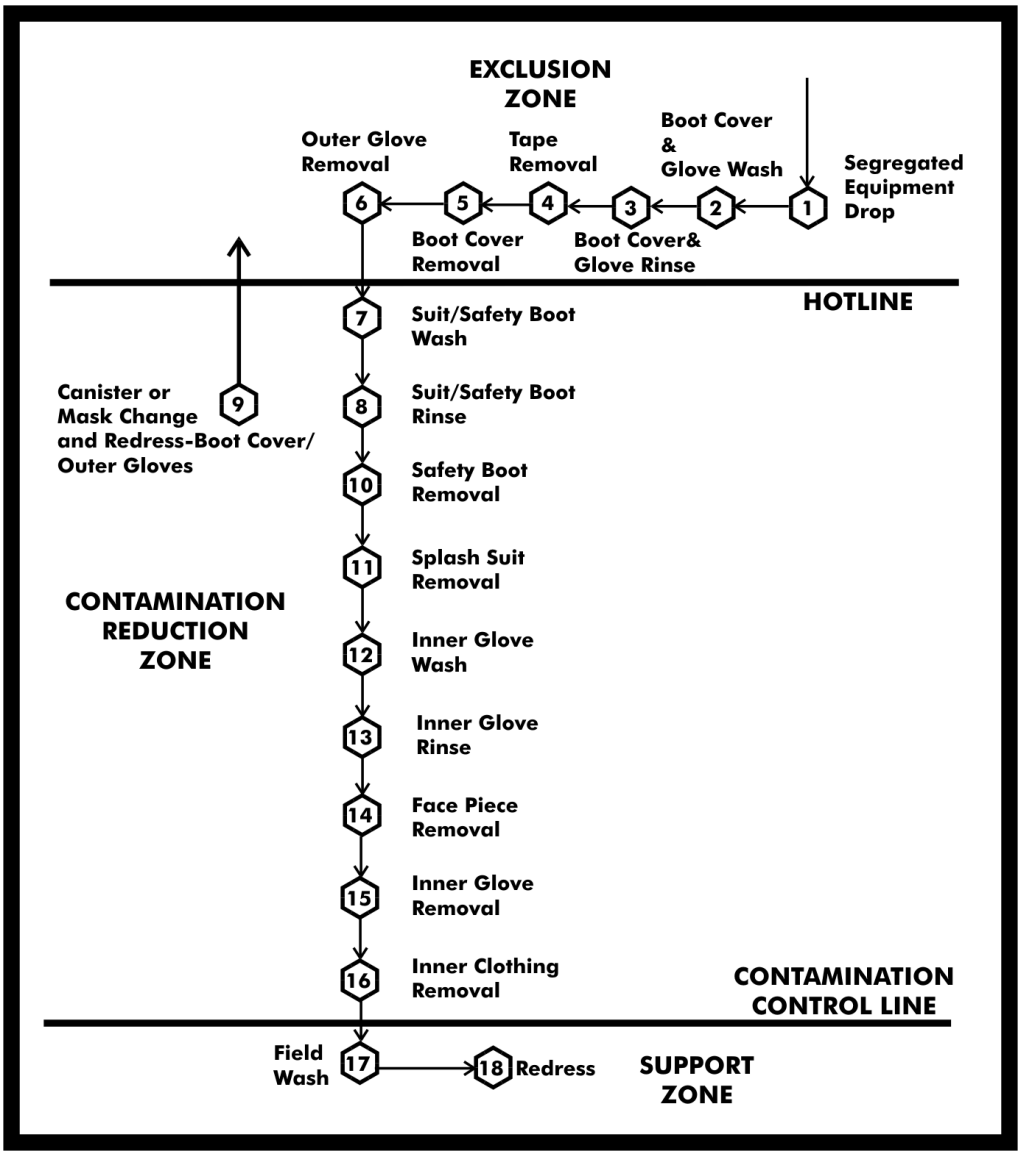
5.4 DECONTAMINATION PLAN, CONTINUED

Procedures for these stations are as follows:

MAXIMUM MEASURES FOR DECONTAMINATION		
STATION 17	Field wash	Shower if highly toxic, skin-corrosive or skin-absorbable materials are known or suspected to be present. Wash hands and face if shower is not available.
STATION 18	Re-dress	Put on clean clothes.

5.4 DECONTAMINATION PLAN, CONTINUED

DECONTAMINATION PROCEDURES, MAXIMUM DECONTAMINATION LAYOUT



5.5 DISPOSAL PLAN

Incident Name:	Incident Location:
Status As Of:	
Waste Name:	
Weather Conditions:	
State Agency:	
Agency Representative responsible for waste management/disposal:	
Phone:	
Injuiry made to obtain variance on:	
Individual contacted:	
Disposal Priorities	
Step One - Sample	

Oil Sample was extracted/sent for analysis on:		
Lab Name:		
Chain of Custody:	Relinquished By:	Received By:

Step Two - Option	Available	Most Likely
Natural Degradation or Dispersion		
Pit Burial		
Landfill		
Land Farms		
In-Situ Burning		
Open Pit Burning		
Portable Incineration		
Air Curtain Incineration		
Process Incineration		
Reprocessing		
Reclaiming		
Recycling		
Well Injection		

Locate Resources for Disposal:		
Percent Oil:		
Percent Solids:		
Percent Debris:		
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5.5 DISPOSAL PLAN, CONTINUED

Step Three - Information
Generator Name:
Generator USEPA ID:
Generator Address:
Technical Contact:
Properties and composition:
Process generating waste:
Waste Name:
Is USEPA Hazardous Waste:

Identify all USEPA listed and characterized waste code numbers (D,F,K,P,U):
State Waste Codes:
Step Four - Waste Storage and Transportation
Proposed shipping methods:
Transporter ID Number
Permit required:
Facility ID Number:
VN/NA:
Estimated storage capacity needed for disposal:
Type of storage needed:
Estimated quantity of each:
Local facilities for temporary storage:
Protective equipment:

Disposal Plan Page 2	1999-2000 dbSoft, Inc.	Printed by:

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5.7 DEMOBILIZATION PLAN

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

Demobilization procedures:

- Operations Section will determine which resources are ready for release from a specific collection site.
- The Planning Section will provide guidance on release priorities and demobilization recommendations.
- Information maintained by the Planning Section will be utilized to assist in the prioritization.
- Each incident will require a Decontamination Area.
- Decontaminated equipment will be returned to appropriate staging area for release or re-deployment.
- Transports for equipment will be required if remote from staging area.

- The Planning Section will document all demobilization and decontamination activities.
- Equipment designated for re-assignment will be mobilized to the appropriate staging area.
- The Division Supervisor will ensure a log is maintained documenting that proper decontamination procedures are performed for each piece of equipment.
- The Operations Section will ensure that redeployed personnel receive proper rest prior to returning to duty.
- The Planning Section Chief will monitor personnel redeployment activities to ensure number of hours worked is within acceptable guidelines.
- The Operations Section Chief must approve the Demobilization Plan before decontamination, release, or redeployment of any resources.

5.8 INCIDENT POTENTIAL WORKSHEET

Incident / Exercise Name: _____

Date / Time: _____

Completed By: _____

~ (Check marks or answers in ***BOLD ITALIC*** areas should trigger a crisis potential review by the BST) ~

☐ Please define the potential geographic area subject to potential impacts:

_____

_____

MAGNITUDE AND DURATION OF INCIDENT RESPONSE OPERATIONS	
Can the incident be managed solely by local personnel resources?	☐ Yes ☐ ***No***
Will emergency response operations continue around the clock?	☐ ***Yes*** ☐ No
Will emergency response operations go on for an extended period of time?	☐ ***Yes*** ☐ No ***How Long?*** _____
SOURCE	
Source?	☐ Known ☐ ***Unknown***
Source control status?	☐ Controlled ☐ ***Uncontrolled***
If the source is controlled, what is the potential for loss of	☐ Low ☐ ***Medium*** ☐

control?	***High***
Nature of uncontrolled source?	☐ Stabilized ☐ ***Growing***
Is special expertise needed to bring the source under control?	☐ ***Yes*** ☐ No
MATERIAL SPILLED / EMITTED	
Nature/hazards of material known?	Nature known: ☐ Yes ☐ ***No*** Hazards known: ☐ Yes ☐ ***No***
Nature of release?	☐ Batch ☐ ***Continuous***
Material contained or uncontained?	☐ Contained ☐ ***Uncontained***
If the material is contained, what is the potential for loss of containment?	☐ None ☐ Low ☐ ***Medium*** ☐ ***High***
Material in a moving waterway?	☐ ***Yes*** ☐ No
Material within or under ice?	☐ ***Yes*** ☐ No
Is special expertise needed to contain and recover the material?	☐ ***Yes*** ☐ No

5.8 INCIDENT POTENTIAL WORKSHEET, CONTINUED

HEALTH AND SAFETY	
Does the release area appear to pose an immediate danger to the life or health of any person or the environment?	☐ ***Yes*** ☐ No
Are there significant, ongoing short term or long term threats to personnel or public safety?	Personnel ☐ ***Yes*** ☐ No *If yes, term:* ☐ ***Short*** ☐ ***Long*** Public ☐ ***Yes*** ☐ No *If yes, term:* ☐ ***Short*** ☐ ***Long***
Are there people missing? How many? Affiliation? Likelihood of rescue/survival?	☐ ***Yes*** ☐ No _____ ☐ ***Employee*** ☐ ***Contractor*** ☐ ***Other*** _____ ☐ ***High*** ☐ ***Low*** ☐ ***Unkown***
Are any people injured? How many? Have the victims been identified? Affiliation? Nature and severity of injuries?	☐ ***Yes*** ☐ No _____ ☐ ***Yes*** ☐ ***No*** ☐ ***Employee*** ☐ ***Contractor*** ☐ ***Other*** _____ ☐ ***Not Life Threatening***

	☐ ***Life Threatening***
Have next-of-kin notifications been made?	☐ ***Yes*** ☐ ***No***
Are there any fatalities?	☐ ***Yes*** ☐ No
How many?	
Have the victims been identified?	☐ ***Yes*** ☐ ***No***
Affiliation?	☐ ***Employee*** ☐ ***Contractor*** ☐ ***Other***
Have the bodies been removed from incident scene?	☐ ***Yes*** ☐ ***No***
Have next-of-kin been notified?	☐ ***Yes*** ☐ ***No***
Has any governmental authority declared the scene of the incident to be a crime scene?	☐ ***Yes*** ☐ No
HUMAN RESOURCES CONCERNS	
Do the responders need psychological support?	☐ ***Yes*** ☐ No
Do employees need psychological support?	☐ ***Yes*** ☐ No
Are there issues relating to compensation with response personnel?	☐ ***Yes*** ☐ No
Is there a need for family assistance for response personnel?	☐ ***Yes*** ☐ No

5.8 INCIDENT POTENTIAL WORKSHEET, CONTINUED

COMMUNITY IMPACTS	
Are communities impacted or threatened?	☐ ***Yes*** ☐ No
What is the nature / severity of the impact:	
Health and safety?	☐ ***Yes*** ☐ No
Social?	☐ ***Yes*** ☐ No
Cultural?	☐ ***Yes*** ☐ No
Economic?	☐ ***Yes*** ☐ No
Environmental?	☐ ***Yes*** ☐ No
What is the potential exposure to third party claims?	☐ None ☐ Minor (localized) ☐ ***Major (regional or beyond)***
What is the tenor of contacts with / from impacted / threatened communities?	☐ Cooperative ☐ ***Strained*** ☐ ***Antagonistic***
IMPACT ON NORMAL OPERATIONS< td>	
Has the incident caused a shutdown or curtailment of normal operations?	☐ ***Yes*** ☐ No; *If yes:* ☐ ***Shutdown*** ☐ ***Curtailment***
How long are the shutdown / curtailment likely to last?	
What is the estimate of lost production / throughput to pipeline?	*bbls/day*
What impact will the shutdown / curtailment have on other	☐ None ☐ Minor (a few

operations?	days) ☐ ***Moderate (approx. a week)*** ☐ ***Severe***
ENVIRONMENTAL IMPACTS	
What is the potential magnitude of environmental impacts?	☐ Localized ☐ ***Widespread***
Are weather conditions likely to limit the ability to respond? **Please explain (research forecast):**	☐ ***Yes*** ☐ No
Is the incident likely to impact wildlife?	☐ ***Yes*** ☐ No *If yes:* ☐ Minor ☐ ***Major***
Are listed species / pre-identified sensitive areas impacted / threatened by the incident?	☐ ***Yes*** ☐ No
Are specialized resources needed to provide assistance in any of the following areas: Land access? Use of alternative technologies? Wildlife capture / rehabilitation? Waste management? Cleanup assessment? Natural resource damage assessment? Air quality monitoring? Water quality monitoring?	 ☐ ***Yes*** ☐ No ☐ ***Yes*** ☐ No ☐ ***Yes*** ☐ No ☐ ***Yes*** ☐ No ☐ ***Yes*** ☐ No ☐ ***Yes*** ☐ No ☐ ***Yes*** ☐ No ☐ ***Yes*** ☐ No

5.8 INCIDENT POTENTIAL WORKSHEET, CONTINUED

EXTERNAL AFFAIRS	
Are there any required notifications yet to be made?	☐ Yes ☐ ***No***
Are government agencies willing to participate in Unified Command?	☐ Yes ☐ ***No***
Are government agencies willing, as appropriate, to integrate with BP's IMT?	☐ Yes ☐ ***No***
What is the tenor of interactions with / from government agencies?	☐ Cooperative ☐ ***Strained*** ☐ ***Antagonistic***
What level of media interest is the incident likely to generate?	☐ Low ☐ ***High***
Are representatives of the media present?	☐ ***Yes*** ☐ No
What is the volume of media inquiries?	☐ Low ☐ ***High***

What is the tenor of media inquiries?	☐ Cooperative ☐ ***Strained*** ☐ ***Antagonistic***
Can media inquiries be handled with local resources?	☐ Yes ☐ ***No***
Will a local Joint Information Center (JIC) have to be established?	☐ ***Yes*** ☐ No
LEGAL CONCERNS	
Has an IMT Law Officer arrived at the Incident Command Post?	☐ ***Yes*** ☐ No
Is legal assistance needed in any of the following areas: Accident investigation? Documentation? Contracts? Claims? Natural Resource Damage Assessment?	 ☐ ***Yes*** ☐ No ☐ ***Yes*** ☐ No ☐ ***Yes*** ☐ No ☐ ***Yes*** ☐ No ☐ ***Yes*** ☐ No
FINANCIAL CONCERNS	
Is financial assistance needed in any of the following areas: Accounting? Cost tracking? Contracts? Audit? Claims? Insurance?	 ☐ ***Yes*** ☐ No ☐ ***Yes*** ☐ No ☐ ***Yes*** ☐ No ☐ ***Yes*** ☐ No ☐ ***Yes*** ☐ No ☐ ***Yes*** ☐ No
Will there be a need to maintain cash accounts to support emergency response operations?	☐ ***Yes*** ☐ No
Are spending authorities adequate?	☐ Yes ☐ ***No***

5.8 INCIDENT POTENTIAL WORKSHEET, CONTINUED

Summary of Current Findings

Magnitude and Duration of Incident Response Operations: _____

_____

Source: _____

_____

Material Spilled/Emitted: _____

_____

Health and Safety: _____

_____

Human Resources Concerns:

Community Impacts:

Impact on Normal Operations:

Environmental Impacts:

External Affairs:

Legal Concerns:

Financial Concerns:

SECTION 6 Last revised: October 2012

SENSITIVE AREAS / RESPONSE TACTICS

6.1 AREA DESCRIPTION

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

Sensitivity maps are provided in **SECTION 6.8**.

6.2 SPILL CONTAINMENT / RECOVERY

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

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

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

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

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

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

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

6.2 SPILL CONTAINMENT / RECOVERY, CONTINUED

Containment/Diversion Berming	• Berms are constructed ahead of advancing surface spills to contain spill or divert spill to a containment area. • May cause disturbance of soils and some increased soil penetration.

Blocking/Flow-Through Dams	• Construct dam in drainage course/stream bed to block and contain flow of spill. Cover with plastic sheeting. If water is flowing install inclined pipes during dam construction to pass water underneath dam. • May increase soil penetration.
Culvert Blocking	• Block culvert with plywood, sandbags, sediments, etc. to prevent oil from entering culvert.
Interception Trench	• Excavate ahead of advancing surface spill to contain spill and prevent further advancement; cover bottom and gradients with plastic. • May cause disturbance of soils and increased soil penetration.
Containment Booming	• Boom is deployed around free oil. • Boom may be anchored or left to move with the oil.
Diversion Booming	• Boom is deployed at an angle to the approaching oil. • Oil is diverted to a less sensitive area. • Diverted oil may cause heavy oil contamination to the shoreline downwind and down current. • Anchor points may cause minor disturbance to the environment.
Exclusion Booming	• Boom is placed around a sensitive area or across an inlet, a river mouth, a creek mouth, or a small bay. • Approaching oil is contained or deflected (diverted) by the boom. • Anchor points may cause minor disturbance to the environment.

6.2 SPILL CONTAINMENT / RECOVERY, CONTINUED

Sorbent Booming

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

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

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

FIGURE 6.2-1 - RESPONSE TACTICS FOR VARIOUS SHORELINES

TYPES	DESCRIPTION	PREDICTED OIL IMPACT	RECOMMENDED CLEANUP ACTIVITY

Developed/ Unforested Land	• This class includes towns, cities, farms, pastures, fields, reclaimed wetlands, and other altered areas
	• Organisms and algae may be common in riprap structures and on pilings
		• Oil would percolate easily between the gravel and boulders of riprap structures
		• Oil would coat the intertidal areas of solid structures
		• Biota would be damaged or killed under heavy accumulations
			• May require high pressure spraying:
			  • To remove oil
			  • To prepare substrate for recolonization of barnacle and oyster communities
			  • For aesthetic reasons

Freshwater Flat	• Mud or organic deposits located along the shore or in shallow portions of nontidal freshwater lakes and ponds • They are exposed to low wave and current energy • They are often areas of heavy bird use	• Oil is expected to be deposited along the shoreline • Penetration of spilled oil into the water-saturated sediments of the flat will not occur • When sediments are contaminated, oil may persist for years	• These areas require high priority for protection against oil contamination • Cleanup of freshwater flats is nearly impossible because of soft substrate • Cleanup is usually not even considered because of the likelihood of mixing oil deeper into the sediments during the cleanup effort • Passive efforts, such as sorbent boom can be used to retain oil

			as it is naturally removed

Fresh Marsh	• Found along freshwater ponds and lakes
	• These marshes have various types of vegetative cover, including floating aquatic mats, vascular submerged vegetation, needle and broad-leaved deciduous scrubs and shrubs, and broad-leaved evergreen scrubs and shrubs
	• Birds and mammals extensively use fresh marshes for feeding and breeding purposes
		• Small amounts of oil will contaminate the outer marsh fringe only; natural removal by wave action can occur within months
		• Large spills will cover more area and may persist for decades
		• Oil, particularly the heavy fuel oils, tends to adhere readily to marsh grasses
			• Marshes require the highest priority for shoreline protection
			• Natural recovery is recommended when:
			  • A small extent of marsh is affected
			  • A small amount of oil impacts the marsh fringe
			• The preferred cleanup method is a combination of low-pressure flushing, sorption, and vacuum pumping performed from boats
			• Any cleanup activities should be supervised closely to avoid excessive disturbances of the marsh surface or roots
			• Oil wrack and other debris may be removed by hand

Swamp	• Swamps are freshwater wetlands having varying water depths with vegetation types ranging from shrubs and scrubs to poorly drained forested wetlands. Major vegetative types include: scrubs, shrubs, evergreen trees, and hardwood forested woodlands • Birds and mammals use swamps during feeding and breeding activities	• Even small amounts of spilled oil can spread through the swamp • Large spills will cover more area and may persist for decades since water-flushing rates are low • Oil, particularly the heavy fuel oils, will adhere to swamp vegetation • Unlike mangroves, the roots of swamp forest trees are not exposed; thus, little damage to trees is expected. Any underbrush	• No cleanup recommended under light conditions • Under moderate to heavy accumulations, to prevent chronic oil pollution of surrounding areas placement of sorbent along fringe swamp forest (to absorb oil as it is slowly released) may be effective under close scientific supervision • Proper strategic boom placement may be highly effective in trapping large quantities of oil, thus reducing oil impact to

		vegetation, however, would be severely impacted	interior swamp forests • Oil trapped by boom can be reclaimed through the use of skimmers and vacuums

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

TYPES	DESCRIPTION	PREDICTED OIL IMPACT	RECOMMENDED CLEANUP ACTIVITY
Open Water	• Have ocean-like waves and currents • Weather changes effect on-water conditions • River mouths present problems • Thermal stratification occurs	• Most organisms are mobile enough to move out of the spill area • Aquatic birds are vulnerable to oiling • Human usage (such as transportation, water intakes, and recreational activities) may be restricted	• Booming, skimming, vacuuming, and natural recovery are the preferred cleanup methods • Should not use sorbents, containment booming, skimming, and vacuuming on gasoline spills • Cleanup options include physical herding, sorbents, and debris/vegetation removal
Large Rivers	• May have varying salinities, meandering channels, and high flow rates • May include manmade structures (such as dams and locks) • Water levels vary seasonally • Floods generate high suspended sediment and debris loads	• Fish and migratory birds are of great concern • Under flood conditions, may impact highly sensitive areas in floodplains • Human usage may be high • When sediments are contaminated, oil may persist for years	• Booming, skimming, and vacuuming are the preferred cleanup methods • Should not use sorbents, containment booming, skimming, and vacuuming on gasoline spills • Cleanup options include natural recovery, physical herding, sorbents, and debris/vegetation removal
Small Lakes and Ponds	• Water surface can be choppy • Water levels can fluctuate widely • May completely freeze in winter	• Wildlife and socioeconomic areas likely to be impacted • Wind will control the oil's distribution	• Booming, skimming, vacuuming, and sorbents are the preferred cleanup methods • Should not use

	Bottom sediments near the shore can be soft and muddy • Surrounding area may include wet meadows and marshes		containment booming, vacuuming, sorbents, and skimming on gasoline spills • Cleanup options include physical herding, sorbents, and debris/vegetation removal
Small Rivers and Streams	• Wide range of water bodies - fast flowing streams to slow moving bayous with low muddy banks and fringed with vegetation • May include waterfalls, rapids, log jams, mid-channel bars, and islands • Weathering rates may be slower because spreading and evaporation are restricted	• Usually contaminate both banks and the water column, exposing a large number of biota to being oiled • Water intakes for drinking water, irrigation, and industrial use likely to be impacted	• Booming, skimming, vacuuming, sorbents, barriers, and berms are the preferred cleanup methods • Should not use containment booming, sorbents, vacuuming, and skimming on gasoline spills • Cleanup options include physical herding, natural recovery, debris removal, vegetation removal, and in-situ burn

6.3 SENSITIVE AREA PROTECTION

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

In the event a product spill reaches a major area waterway, it may be necessary to protect downstream sensitive areas if it appears that local containment and recovery efforts will not be sufficient to control the entire spill. Major waterways and specific sensitive areas located downstream of the facility are provided in SECTION 6.8. Information on booming strategies are provided in SECTION 6.9 and in the Geographic Response Plan in APPENDIX G.

FIGURE 6.3-1 - SENSITIVE AREA PROTECTION IMPLEMENTATION SEQUENCE

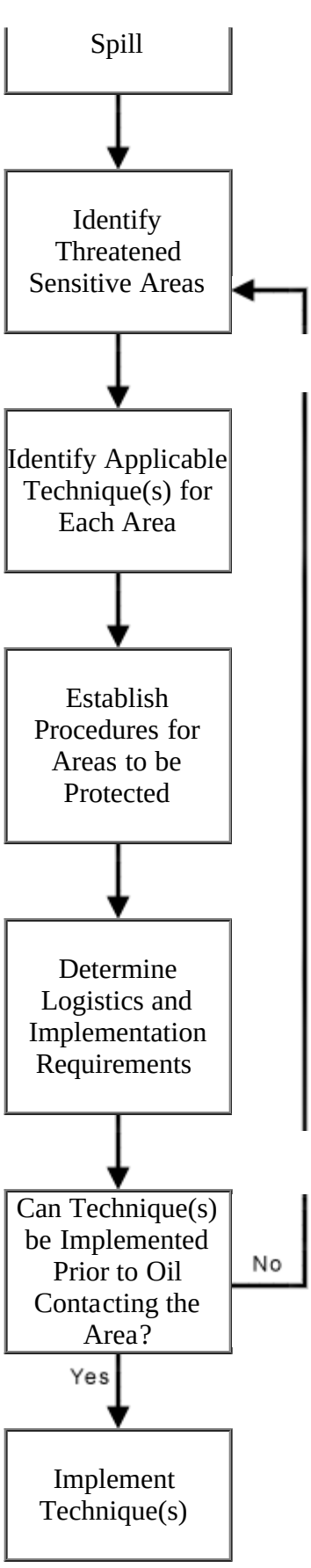


FIGURE 6.3-2 - SUMMARY OF SHORELINE AND TERRESTRIAL CLEANUP TECHNIQUES

TECHNIQUE	DESCRIPTION	RECOMMENDED EQUIPMENT	APPLICABILITY	POTENTIAL ENVIRONMENTAL EFFECTS
Removal				
1. Manual Removal	Hand tool (scrapers, wire brushes, shovels, cutting tools, wheel barrows, etc.) are used to scrape oil off surfaces or recover oiled sediments, vegetation, or debris where oil conditions are light or sporadic and/or access is limited.	Equipment misc. hand tools Personnel 10-20 workers	• Can be used on all habitat types • Light to moderate oiling conditions for stranded oil or heavy oils that have formed semi-solid to solid masses • In areas where roosting or birthing animals cannot or should not be disturbed	• Sediment disturbance and erosion potential
2. Mechanical Removal	Mechanical earthmoving equipment is used to remove oiled sediments and debris from heavily impacted areas with suitable access.	Equipment motor grader, backhoe, dump truck elevating scrapers Personnel 2-4 workers plus equipment operators	• On land, wherever surface sediments are accessible to heavy equipment • Large amounts of oiled materials	• Removes upper 2 to 12 inches of sediments
3. Sorbent Use	Sorbents are applied manually to oil accumulations, coatings, sheens, etc., to remove and recover the oil.	Equipment misc. hand tools misc. sorbents Personnel 2-10 workers	• Can be used on all habitat types • Free-floating oil close to shore or stranded on shore, secondary treatment method after gross oil removal	• Sediment disturbance and erosion potential • Trampling of vegetation and organisms • Foot traffic can work oil deeper into soft sediments

			Sensitive areas where access is restricted	
4. Vacuum/Pumps/ Skimmers	Pumps, vacuum trucks, skimmers are used to remove oil accumulations from land or relatively thick floating layers from the water.	Equipment 1-2 50- to 100-bbl vacuum trucks w/hoses 1-2 nozzle screens or skimmer heads Personnel 2-6 workers plus truck operators	• Can be used on all habitat types • Stranded oil on the substrate • Shoreline access points	• Typically does not remove all oil • Can remove some surface organisms, sediments, and vegetation
Washing				
5. Flooding	High volumes of water at low pressure are used to flood the oiled area to float oil off and out of sediments and back into the water or to a containment area where it can be recovered. Frequently used with flushing.	Equipment 1-5 100- to 200-gpm pumping systems 1 100-ft perforated header hose per system 1-2 200-ft containment booms per system 1 oil recovery device per systems Personnel 6-8 workers per system	• All shoreline types except steep intertidal areas • Heavily oiled areas where the oil is still fluid and adheres loosely to the substrate • Where oil has penetrated into gravel sediments • Used with other washing techniques	• Can impact clean downgradient areas • Can displace some surface organisms if present • Sediments transported into water can affect water quality

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

TECHNIQUE	DESCRIPTION	RECOMMENDED EQUIPMENT	APPLICABILITY	POTENTIAL ENVIRONMENTAL EFFECTS
Washing, Continued				
6. Flushing	Water streams at low to moderate pressure, and possibly elevated	Equipment 1-5 50- to 100-gpm/ 100-psi pumping systems with	• Substrates, riprap, and solid man-made	• Can impact clean downgradient areas

	temperatures, are used to remove oil from surface or near-surface sediments through agitation and direct contact. Oil is flushed back into the water or a collection point for subsequent recovery. May also be used to flush out oil trapped by shoreline or aquatic vegetation.	manifold 1-4 100-ft hoses and nozzles per system 1-2 200-ft containment booms per system 1 oil recovery device per system Personnel 8-10 workers per system	structures • Oil stranded onshore • Floating oil on shallow intertidal areas	• Will displace many surface organisms if present • Sediments transported into water can affect water quality • Hot water can be lethal to many organisms • Can increase oil penetration depth
7. Spot (High Pressure Washing)	High pressure water streams are used to remove oil coatings from hard surfaces in small areas where flushing is ineffective. Oil is directed back into water or collection point for subsequent recovery.	Equipment 1-5 1,200- to 4,000-psi units with hose and spray wand 1-2 100-ft containment booms per unit 1 oil recovery device per unit Personnel 2-4 workers per unit	• Bedrock, man-made structures, and gravel substrates • When low-pressure flushing is not effective • Directed water jet can remove oil from hard to reach sites	• Will remove most organisms if present • Can damage surface being cleaned • Can affect clean downgradient or nearby areas
In Situ				
8. Passive Collection	Sorbent/snare booms or other sorbent materials are anchored at the waterline adjacent to heavily oiled areas to contain and recover oil as it leaches from the sediments.	Equipment 1,000- to 2,000- ft sorbent/snare boom 200-400 stakes or anchor systems Personnel 4-10 workers	• All shoreline types • Calm wave action • Slow removal process	• Significant amounts of oil can remain on the shoreline for extended periods of time
9. Sediment Tilling	Mechanical equipment or hand tools are used to till lightly to	Equipment 1 tractor fitted with tines, dicer, ripper blades, etc. or 1-4 rototillers or	• Any sedimentary substrate that can support heavy	• Significant amounts of oil can remain on the shoreline for extended

	moderately oiled surface sediments to maximize natural degradation processes.	1 set of hand tools Personnel 2-10 workers	equipment • Sand and gravel beaches with subsurface oil • Where sediment is stained or lightly oiled • Were oil is stranded above normal high waterline	periods of time • Disturbs surface sediments and organisms

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

TECHNIQUE	DESCRIPTION	RECOMMENDED EQUIPMENT	APPLICABILITY	POTENTIAL ENVIRONMENTAL EFFECTS
In Situ, Continued				
10. In-Situ Bioremediation	Fertilizer is applied to lightly to moderately oiled areas to enhance microbial growth and subsequent biodegradation of oil.	Equipment 1-2 fertilizer applicators 1 tilling device if required Personnel 2-4 workers	• Any shoreline habitat type where nutrients are deficient • Moderate to heavily oiled substrates • After other techniques have been used to remove free product on lightly oiled shorelines • Where other techniques are destructive or ineffective	• Significant amounts of oil can remain on the shoreline for extended periods of time • Can disturb surface sediments and organisms
11. Log/Debris Burning	Oiled logs, driftwood, vegetation, and	Equipment 1 set of fire control equipment	• On most habitats except dry	• Heat may impact local near-surface

	debris are burned to minimize material handling and disposal requirements. Material should be stacked in tall piles and fans used to ensure a hot, clean burn.	2-4 fans 1 supply of combustion promoter Personnel 2-4 workers	muddy substrates where heat may impact the biological productivity of the habitat • Where heavily oiled items are difficult or impossible to move • Many potential applications on ice	organisms • Substantial smoke may be generated • Heat may impact adjacent vegetation
12. Natural Recovery	No action is taken and oil is allowed to degrade naturally.	None required	• All habitat types • When natural removal rates are fast • Degree of oiling is light • Access is severely restricted or dangerous to cleanup crews • When cleanup actions will do more harm than natural removal	• Oil may persist for significant periods of time • Remobilized oil or sheens may impact other areas • Higher probability of impacting wildlife

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

TECHNIQUE	DESCRIPTION	RECOMMENDED EQUIPMENT	APPLICABILITY	POTENTIAL ENVIRONMENTAL EFFECTS
In Situ, Continued				
13. Dispersants	Dispersants are used to reduce	Dispersants Boat or aircraft	• Water bodies with	• Use in shallow water could

	the oil/water interfacial tension thereby decreasing the energy needed for the slick to break into small particles and mix into the water column. Specially formulated products containing surface-active agents are sprayed from aircraft or boats onto the slick.		sufficient depth and volume for mixing and dilution • When the impact of the floating oil has been determined to be greater than the impact of dispersed oil on the water-column community	affect benthic resources • May adversely impact organisms in the upper 30 feet of the water column • Some water-surface and shoreline impacts could occur
1 - Per 1000 feet of shoreline or oiled area				

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

6.4 ALTERNATIVE RESPONSE STRATEGIES

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

6.4.1 Dispersants

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

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

If there is a potential threat to a USCG Pre-authorized zone USCG Classified OSRO equipment may need to be activated. The Company will not use dispersants without the concurrence of the FOSC. Dispersants will not be used without concurrence of the EPA and the state with

jurisdiction over the affected waters. Refer to the NCP for dispersant use policies and procedures.

6.4.2 Bioremediation

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

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

There are, however, instances on open seas or shorelines where standard recovery or cleanup techniques are not practical or will result in significant environmental or physical impacts. In these cases, bioremediation may be a viable response option and should be considered for use. **FIGURE 6.4-2** provides a federal decision guide for bioremediation consideration.

6.4.3 In-Situ Burn

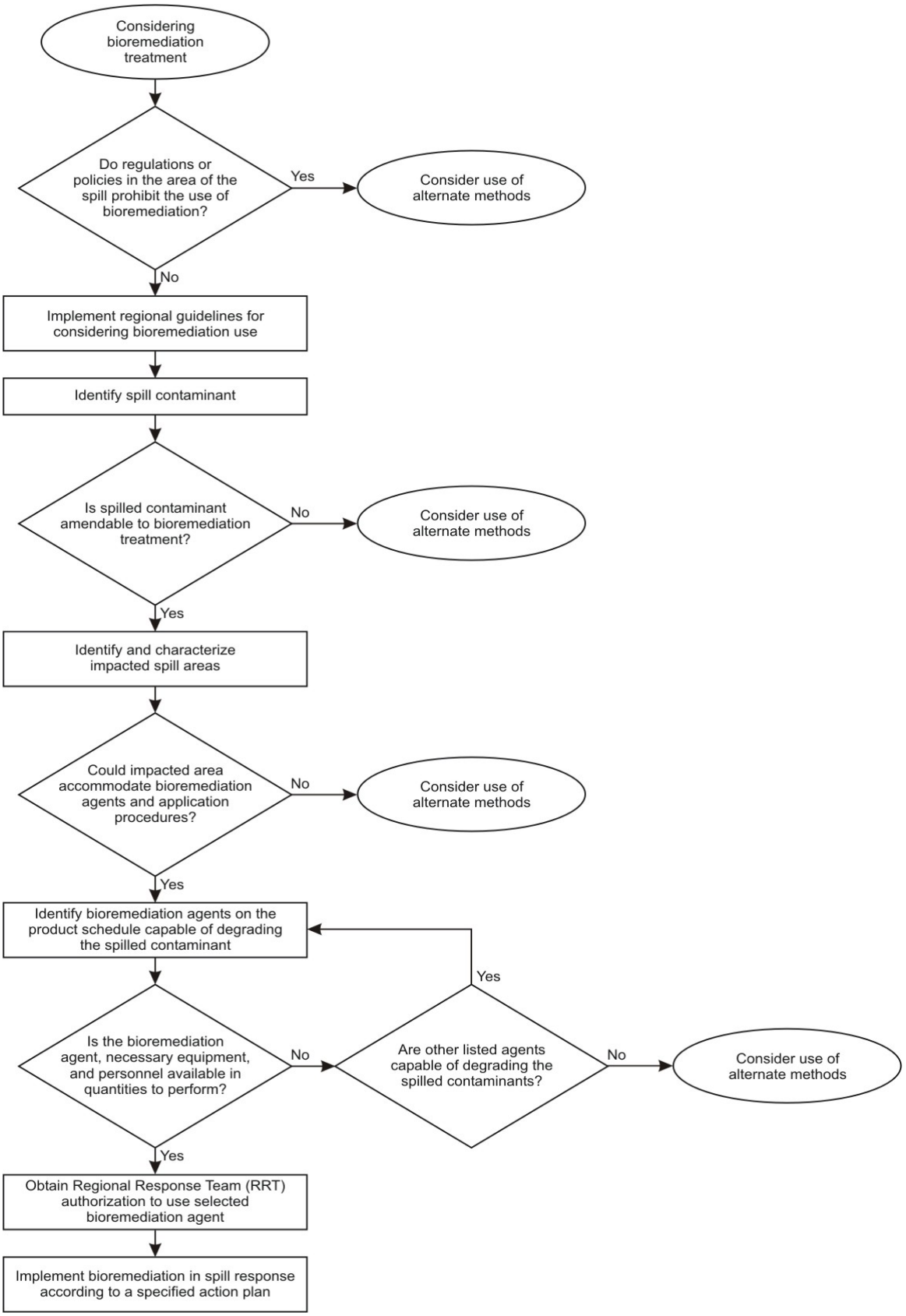
In-Situ burning has been successfully used as a viable technique for mitigating oil spills off shore and in a marsh type environment. This is especially true of areas that have mostly grassy vegetation with little or no woody vegetation. In a grassy marshland environment, an In-Situ burn may produce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

The Company will not use In-Situ Burn without the concurrence of the FOSC and the Regional Response Team (RRT).

FIGURE 6.4-1 - ALTERNATE STRATEGIES CHECKLIST

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

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



6.5 WILDLIFE PROTECTION AND REHABILITATION

- The Company will support wildlife protection and rehabilitation efforts during the response, but will not typically directly manage these efforts.
- Company personnel will not attempt to rescue or clean affected wildlife, because such actions may cause harm to the individuals or may place the animals at further risk.
- Federal and state agencies responsible for wildlife capture and rehabilitation will typically coordinate capturing and rehabilitating oiled wildlife; a list of these agencies are included in **FIGURE 3.1-4**.
- Wildlife rehabilitation specialists may be utilized to assist in capturing and rehabilitating oiled animals as well as deterring unaffected animals away from the spill site.

6.6 ENDANGERED AND THREATENED SPECIES BY STATE

COMMON NAME	SCIENTIFIC NAME	HABITAT	STATUS	STATE
Bat, Indiana	*Myotis sodalis*	Caves, mines, upland forests	E	New Jersey
Chaffseed, American	*Schwalbea americana*	Acidic, sandy or peaty soils in open pine flatwoods	E	New Jersey
Sea turtle, hawksbill	*Eretmochelys imbricata*	Clear offshore waters off the mainland and on island shelves	E	New Jersey
Sea turtle, Kemp's ridley	*Lepidochelys kempii*	Shallow areas with sandy and muddy bottoms	E	New Jersey
Sea turtle, leatherback	*Dermochelys coriacea*	Warm sands of tropical beaches	E	New Jersey
Sturgeon, shortnose	*Acipenser brevirostrum*	Rivers, estuaries, and the sea	E	New Jersey
Tern, roseate northeast U.S. nesting pop.	*Sterna dougallii dougallii*	Coastal islands and beaches	E	New Jersey
Wedgemussel, dwarf	*Alasmidonta heterodon*	Slow moving, sandy rivers	E	New Jersey
Whale, finback	*Balaenoptera physalus*	Offshore ocean waters	E	New Jersey
Whale, humpback	*Megaptera novaeangliae*	Surface of the ocean	E	New Jersey

Whale, right	*Balaena glacialis (incl. australis)*	Surface of the ocean	E	New Jersey

T - Threatened
E - Endangered

6.6 ENDANGERED AND THREATENED SPECIES BY STATE, CONTINUED

COMMON NAME	SCIENTIFIC NAME	HABITAT	STATUS	STATE
Amaranth, seabeach	*Amaranthus pumilus*	Dunes, overwash fans and other areas of bare sand	T	New Jersey
Beaked-rush, Knieskern's	*Rhynchospora knieskernii*	Slow-moving streams in the New Jersey Pinelands region	T	New Jersey
Joint-vetch, sensitive	*Aeschynomene virginica*	Freshwater to slightly brackish tidal marshes	T	New Jersey
Pink, swamp	*Helonias bullata*	Acidic wetlands	T	New Jersey
Plover, piping except Great Lakes watershed	*Charadrius melodus*	Sandy beaches, islands	T	New Jersey
Pogonia, small whorled	*Isotria medeoloides*	Cidic soils, in dry to mesic second-growth	T	New Jersey
Sea turtle, green except where endangered	*Chelonia mydas*	Coasts, open sea	T	New Jersey
Sea turtle, loggerhead	*Caretta caretta*	Estuaries, coastal streams and salt marshes	T	New Jersey
Tiger beetle, northeastern beach	*Cicindela dorsalis dorsalis*	Coastal beaches	T	New Jersey
Turtle, bog (=Muhlenberg) northern	*Clemmys muhlenbergii*	Calcareous (limestone) fens, sphagnum bogs, and wet, grassy pastures	T	New Jersey

T - Threatened
E - Endangered

6.7 VULNERABILITY ANALYSIS

VULNERABILITY ANALYSIS (DETAILED)

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6.7 VULNERABILITY ANALYSIS, CONTINUED

VULNERABILITY ANALYSIS (DETAILED)
Medical Facilities:
No medical facility is in the immediate area of the facility. Any evacuation efforts for these facilities will be coordinated with the local emergency assistance agencies (police department, fire department, etc.).

6.7 VULNERABILITY ANALYSIS, CONTINUED

VULNERABILITY ANALYSIS (DETAILED)
Residential Areas:
High residential population density within the 5-mile planning distance, however, residential areas are not located downstream of the facility or along the Arthur Kill. The closest residential areas are located adjacent to the western and southern sides of the facility. Although a discharge is not expected to flow towards these residences, they may be within the evacuation zone for a worst-case discharge or other significant incident. The Company will work closely with local, county, and state emergency agencies (police, fire, etc.) to coordinate response actions for residential areas that may be impacted by a discharge. Additional information on residential areas in the vicinity of the facility is in the Environmental Sensitivity Index Maps in SECTION 6.8.

6.7 VULNERABILITY ANALYSIS, CONTINUED

VULNERABILITY ANALYSIS (DETAILED)
Businesses:
The Terminal is located within a heavily industrialized area and there are numerous businesses within the 5-mile planning distance. Kinder Morgan is located to the northeast of the terminal and the dock lines between the terminal and the dock run along the southern side of Kinder Morgan. Other businesses are located in close proximity to the Terminal and along Arthur Kill. Depending upon product released and the actual or anticipated extent of impacts, evacuation of these businesses may be required or these businesses may be disrupted by response activities. In addition to the businesses along the Arthur Kill River, other businesses in the vicinity of the facility may be disrupted by a release or response activities. The Company will work closely with local, county, and state emergency agencies (police, fire, etc.) to coordinate response actions for businesses that may be impacted by a discharge.

6.7 VULNERABILITY ANALYSIS, CONTINUED

VULNERABILITY ANALYSIS (DETAILED)
Wetlands or Other Sensitive Environments:
Natural heritage resources identified within the 5-mile planning distance of the Terminal include wetlands; freshwater marshes and swamps; submerged aquatic vegetation beds; threatened and endangered plant and wildlife species; fish spawning and nursery areas; and waterfowl staging and concentration areas. Environmental areas designated under the Shoreline Protection and Management Act are all along the Arthur Kill on both banks in different areas. A release of petroleum product from the Terminal to the river could have a significant impact on these areas. The degree and area of impact would depend upon the extent and migration of the spill. Specific designated areas along Arthur Kill include: - Isle of Meadows located approximately 1 mile south of the terminal dock. - Meredith Woods located approximately 1 mile north of the terminal dock. - Pralls Island and Saw Mill Creek Marsh are located approximately 1-1/2 miles north of the terminal dock. - Sharrots Shoreline located approximately 3 miles south of the terminal dock. During a response situation the USFWS and applicable state agencies should be contacted for information regarding wetlands and other sensitive environments. Upon contact the agencies will be able to: Identify and establish priorities for fish and wildlife, wetlands, and other sensitive environments requiring protection from any direct or indirect effects from a discharge. Identify potential environmental effects on fish and wildlife, wetlands, and other sensitive environments resulting from removal actions or countermeasures.

The Port of New York and New Jersey Area Contingency Plan (ACP) and the Environmental Sensitivity Index maps in Section 6.8 will also be used to further identify sensitive areas. There are no wellhead protection zones for public water supplies established by the municipality within one mile of the terminal.

6.7 VULNERABILITY ANALYSIS, CONTINUED

VULNERABILITY ANALYSIS (DETAILED)
Fish and Wildlife:
Natural heritage resources identified in the vicinity of the Terminal include wetlands; freshwater marshes and swamps; submerged aquatic vegetation beds; threatened and endangered plant and wildlife species; fish spawning and nursery areas; and waterfowl staging and concentration areas. Environmental areas designated under the Shoreline Protection and Management Act are all along the Arthur Kill on both banks in different areas. A release of petroleum product from the Terminal to the river could have a significant impact on these areas. The degree and area of impact would depend upon the extent and migration of the spill. During a response situation the USFWS and applicable state agencies should be contacted for information regarding wetlands and other sensitive environments. Upon contact the agencies will be able to: Identify and establish priorities for fish and wildlife, wetlands, and other sensitive environments requiring protection from any direct or indirect effects from a discharge. Identify potential environmental effects on fish and wildlife, wetlands, and other sensitive environments resulting from removal actions or countermeasures. The USCG New York Area Contingency Plan (ACP) will also be used to further identify sensitive areas. There are no wellhead protection zones for public water supplies established by the municipality within one mile of the terminal.

6.7 VULNERABILITY ANALYSIS, CONTINUED

VULNERABILITY ANALYSIS (DETAILED)
Lakes and Streams:
The closest waterway is the Arthur Kill. The BP Products Terminal is located on the Arthur Kill just South of The Rahway River on the West bank, approximately 8 miles from the Kill Van Kull (KV) Buoy to Carteret Terminal. Other streams and rivers enter Arthur Kill as shown on the Environmental Sensitivity maps in Section 6.8.

6.7 VULNERABILITY ANALYSIS, CONTINUED

VULNERABILITY ANALYSIS (DETAILED)

Endangered Flora and Fauna:
See SECTION 6.6 for a list of endangered and threatened species by state. The endangered flora and fauna that may be potentially impacted by a discharge originating at the Facility have been identified as either wetlands or surrounding creeks and shall be protected as noted. USFWS and applicable state agencies will be contacted for information regarding endangered species.

6.7 VULNERABILITY ANALYSIS, CONTINUED

VULNERABILITY ANALYSIS (DETAILED)
Recreational Areas:
There are several recreational areas (i.e., marinas and parks) along Arthur Kill within the 5-mile planning distance. Specific recreational areas along Arthur Kill include: - Carteret Pier and Waterfront Park located approximately 1 mile soutth of the terminal dock. - Arthur Kill Park located approximately 5 miles north of the terminal dock. - Sewarn Marina Park and Captain Carlson Park located approximately 3 miles south of the terminal dock. - Raritan Yacht Club, Tottenville Shore Park, and Conference House Park located approximately 5 miles south of the terminal dock. Depending upon product released and the actual or anticipated extent of impacts, evacuation of these areas may be required or these areas may be disrupted by response activities. The Company will work closely with local, county, and state emergency agencies (police, fire, etc.) to coordinate response actions for businesses that may be impacted by a discharge.

6.7 VULNERABILITY ANALYSIS, CONTINUED

VULNERABILITY ANALYSIS (DETAILED)
Transportation Routes (Air, Water, Land):
The Arthur Kill is a major shipping route for both barge and ships and is considered a vulnerable maritime transportation route. Depending on the product released and the actual or anticipated extent of impacts, a release or response activities may disrupt marine traffic throughout the planning distance. In the event of a release from the Terminal, response actions would be conducted to minimize impact to Arthur Kill, as well as to surrounding roads. (b) (7)(F) [redacted]

6.8 SENSITIVITY MAPS, CONTINUED

Click here to view - Map 8.

6.8 SENSITIVITY MAPS, CONTINUED

Click here to view - Maps 9a and 9b.

6.8 SENSITIVITY MAPS, CONTINUED

Click here to view - Map 11.

6.8 SENSITIVITY MAPS, CONTINUED

Click here to view - Map 12.

SECTION 7 Last revised: July 2012

SUSTAINED RESPONSE ACTIONS

SECTION 7
SUSTAINED RESPONSE ACTIONS, CONTINUED

7.4 Public Affairs

Figure 7.4-1 - Media Incident Fact Sheet

7.1 RESPONSE RESOURCES

7.1.1 Response Equipment

CATEGORY	TYPE/MODEL	QUANTITY	SIZE	YEAR PURCHASED	OPERATIONAL STATUS	LOCATION AT FACILITY
Carteret Terminal						
Absorbents	Absorbent pads	2 packages per spill kit	100/package (Approx. 0.03 gallons absorbing capacity per pad; 10 to 25 times pad weight in oil)	N/A	Operational	3 Spill Kits (in Overpack Salvage Drums); one each at Dock, Cell 3, and Dock House
Absorbents	Absorbent booms	3 booms	3-inch diameter by 8 feet long (Approx. 2-gallon oil absorbing capacity per boom)	N/A	Operational	3 Spill Kits (in Overpack Salvage Drums); one each at Dock, Cell 3, and Dock House
Absorbents	Absorbent booms	7 booms	5-inch diameter by 10 feet long (Approx. 5- to 7-gallon oil absorbing capacity per boom)	N/A	Operational	3 Spill Kits (in Overpack Salvage Drums); one each at Dock, Cell 3, and Dock House
Absorbents	Absorbent pads	2 packages per spill kit	50/package (Approx. 0.0.3 gallons absorbing capacity per pad; 10 to 25 times pad weight in oil)	N/A	Operational	Spill Kits (in Overpack Salvage Drums) atLoading Rack Lane 1 and Lane 6
Absorbents	Absorbent booms	8 booms per spill kit	5-inch diameter by 10 feet long (Approx. 5- to 7-gallon oil absorbing capacity per	N/A	Operational	Spill Kits (in Overpack Salvage Drums) at Loading Rack Lane 1 and Lane 6

			boom)			
Absorbents	Absorbent pads	6 packages	100/package (Approx. 0.03 gallons absorbing capacity per pad; 10 to 25 times pad weight in oil)	N/A	Operational	Upper Facility Warehouse
Absorbents	Absorbent booms	20 booms	3-inch diameter by 8 feet long (Approx. 2-gallon oil absorbing capacity per boom)	N/A	Operational	Upper Facility Warehouse
Absorbents	Granular Absorbent	8 bags	25 pounds per bag (Approx. 5 to 6 gallons absorbing capacity per bag)	N/A	Operational	Upper Facility Warehouse
Boats and Motors	None	N/A	N/A	N/A	N/A	N/A
Boom	None	N/A	N/A	N/A	N/A	N/A

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

7.1.1 Response Equipment, Continued

CATEGORY	TYPE/MODEL	QUANTITY	SIZE	YEAR PURCHASED	OPERATIONAL STATUS	LOCATION AT FACILITY
Carteret Terminal, Continued						
Chemical Countermeasures Agents Stored	None	N/A	N/A	N/A	N/A	N/A
Communications Equipment	Intrinsically-safe Motorola Portable Radios	14	N/A	N/A	Operational	On-Site
Communications Equipment	Intrinsically-safe Cell	6	N/A	N/A	Operational	On-Site

	(b) (7)(F) [redacted]					
Fire Extinguishers	ID # CM-1, CR-1, K-1, L-1	4			Operational	Terminal Office
Fire Extinguishers	ID # BE-1, BE-2, BEP-1, TK10, RP-1, ROP-1, ROP-2, TK-94, TK-27, TKE-28	10			Operational	Tank Area
Fire Extinguishers	ID # ACA-1	1			Operational	Warehouse ACA
Fire Extinguishers	ID # WH-1, WH-2, WH-3	3			Operational	Upper Warehouse
Fire Extinguishers	ID # LR-1, LR-IA, LR-2, LR-3, LR-4, LR-5A, LR-5B, LR-6A	8			Operational	Load Rack (Truck)
Fire Extinguishers	ID # DO-1, DO-2, DC-1, DC-2, DC-3, DW-1	6			Operational	Dock
Fire Extinguishers	ID # TG-1, TG-2	2			Operational	Garage

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

7.1.1 Response Equipment, Continued

CATEGORY	TYPE/MODEL	QUANTITY	SIZE	YEAR PURCHASED	OPERATIONAL STATUS	LOCATION AT FACILITY
Carteret Terminal, Continued						
Fire Extinguishers	ID # FT-1, FT-2, FT-3, FT-4	4			Operational	Company Vehicles
Fire Extinguishers	ID # KH-1	1			Operational	Key House
Fire Extinguishers	ID # KH-1	1			Operational	Sample Room
Fire Extinguishers	ID # CH-1, CH-2	2			Operational	Colonial Shed

Fire Extinguishers (Wheeled)	ID # F-1, F-2, F-3	3			Operational	Load Rack (Truck)
First Aid	First Aid Kit	1 each			Operational	Terminal Office and Dock House
Hand Tools	Shovels, Pails, Brooms	4 each	N/A	N/A	Operational	Dock House
Hand Tools	Shovels, Pails, Brooms	4 each	N/A	N/A	Operational	Loading Rack
Hand Tools	Shovels, Pails, Brooms	4 each	N/A	N/A	Operational	Upper Plant Warehouse
Other (Heavy Equipment, Cranes, Dozers, etc.)	None	N/A	N/A	N/A	N/A	N/A

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

7.1.1 Response Equipment, Continued

CATEGORY	TYPE/MODEL	QUANTITY	SIZE	YEAR PURCHASED	OPERATIONAL STATUS	LOCATION AT FACILITY
Carteret Terminal, Continued						
Skimmers/Pumps	None	N/A	N/A	N/A	N/A	N/A
Sorbents	None	N/A	N/A	N/A	N/A	N/A

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

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

* USCG Classified OSRO

COMPANY/CONTRACTOR	EQUIPMENT	RESPONSE TIME
*Atlantic Response Inc. Carteret, NJ	Full Response Capabilities per U.S. Coast Guard Classification	0.5 hours

*Clean Harbors Cooperative Linden, NJ	Full Response Capability per U.S. Coast Guard Classification	1 hours
*Marine Spill Response Corporation (MSRC) Edison, NJ	Full Response Capabilities per U.S. Coast Guard Classification, including aerial tracking and dispersants	2 hours

7.1.2 Response Equipment Inspection and Maintenance

Terminal response resources consist of safety and emergency response equipment strategically located around the Facility, as noted in **SECTION 7.1.1**.

Company response equipment is tested and inspected as noted below. The Terminal Manager is responsible for ensuring that response equipment inspection and testing procedures are implemented. Completed inspection checklists are maintained at the facility and retained for a period of five years. Copies of representative completed checklists are in **APPENDIX G**. Records of equipment inspection and deployment exercises (see **APPENDIX A: FIGURE A.1-4**) are recorded and maintained at the facility and retained for a period of five years.

As applicable, inspections consist of the following:

7.1.2 Response Equipment Inspection and Maintenance
Absorbents (Pads, Socks, Granular, etc.)
Monthly inspections of the absorbents will be performed to observe that the types and quantities listed in the FRP are available, properly stored, and readily accessible. The inspection will also observe that the absorbents and/or packaging is in good condition and the absorbents appear to be ready for use.
Fire Alarm System
Inspection and Maintenance of the fire alarm system will be performed in accordance with SMP USPL-MAN-732-010. The fire alarm system includes: fire alarm control panel; detector input; audible alarm (e.g., horn); visual alarm (e.g., light or strobe); and/or notification/call-out device(s). As described in the SMP, inspection and maintenance activities include: visual inspection; in-place operation testing; in-place maintenance; and annual comprehensive inspection.
Automated Fire Protection Foam System
Inspection and Maintenance of the automated fire protection foam system will be performed in accordance with SMP USPL-MAN-732-050. The automated fire protection foam system includes; foam supply tank; foam pump; foam/water sprinkler or spray system and proportioner; foam delivery piping system; tank foam chambers and/or monitors, foam concentrate; and/or tank subsurface foam injection systems. As described in the SMP, inspection and maintenance activities include: visual inspection; in-place operation testing; in-place maintenance; and annual comprehensive inspection.
Fire Protection System Valves
Control valves are an integral part of a fire protection system and regular inspection, maintenance, and testing is performed in accordance with SMP USPL-MAN-732-070 to

maintain these valves in proper operating condition. Fire Protection System Valves include deluge valves (complex control valves containing many trim valves) and post indicator valves. As described in the SMP, inspection and maintenance activities include: visual inspection; in-place operation testing; in-place maintenance; and annual comprehensive inspection.

Diesel- and Electric-driven Fire Water Pumps

7.1.2 Response Equipment Inspection and Maintenance, Continued

Diesel- and Electric-driven Fire Water Pumps, Continued

Fire water pump will be inspected and tested weekly in accordance with SMP USPL STP-32-102 and NFPA 25. The entire fire protection system, including the fire water pump shall be tested annually or more frequently if required by local regulations, this SMP and NFPA 25. A qualified third party fire protection contractor will perform the annual inspection.

Fire Extinguishers

Fire extinguishers are inspected and maintained in accordance with the procedures in Document USPL-MAN-732-080. Terminal personnel inspect fire extinguishers monthly and observe the location and condition of each extinguisher. In addition, a qualified third party fire protection contractor performs annual inspections in general accordance with the National Fire Protection Association (NFPA) standards and guidance.

Other Firefighting Equipment

Inspection, testing and preventive maintenance of other firefighting equipment (e.g., hydrants, monitors, and hose lines) will be performed annually by a qualified third party fire protection contractor in general accordance with the NFPA standards and guidance.

Hand Tools

Monthly inspections of the hand tools (e.g., shovels, scoops, brooms) will be performed to observe that they are in good condition (i.e., handles intact, blades/brushes secure, etc.) and that hand tools designated for spill response are properly stored in the correct locations (e.g., with other response equipment) and readily accessible.

Miscellaneous equipment

Other response equipment that may be in this Plan (such as hand tools and heavy equipment) will be inspected on a semiannual basis to ensure that the stated quantities are in inventory and in proper working order. As applicable, the person conducting the inspection will observe that adequate fuel/lubricants for equipment are available and properly stored and that equipment starts and operates properly.

7.1.3 Contractors, Contractor Equipment, and Labor

- The Company's primary response contractors' names and phone numbers, as well as other companies who can provide spill response services are provided in **SECTION 3**.
- The Company has ensured by contract the availability of private personnel and equipment necessary to respond, to the maximum extent practicable, to the small discharge or the substantial threat of such discharge, as stated in **APPENDIX D.5.1**.

- The Company has ensured by contract with OSROs the availability of private personnel and equipment necessary to respond, to the maximum extent practicable, to the worst case discharge or the substantial threat of such discharge.
- **APPENDIX B** contains evidence of contracts for the Company's primary OSROs and spill response contractors.
- Annually, the Company will request the current equipment lists for their OSROs and spill response contractors.
- The Company will maintain copies of the current OSRO and spill response contractor equipment lists in the Facility's office.

7.1.4 Command Post

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

FIGURE 7.1-2 - COMMAND POST CHECKLIST

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

7.1.5 Staging Area

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

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

- Accessibility to impacted areas;

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

In addition, the staging area should:

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

7.1.6 Communications Plan

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

- The BP Notification Center (phone reference in FIGURE 3.1-3) is manned 24 hours a day and is available for backup support.
- Fourteen (14) intrinsically-safe portable radios and six (6) Intrinsically-safe cellular telephones with direct communication (i.e., "push to talk") are used by terminal personnel for communications between the dock, tank farm, pipeline manifold, and office. These radios, which would be used in an emergency, are capable of operating on one (1) frequency and have 2.2 watts of power capacity. Each of these radios and cellular telephones is serviced by its own standard charger and is stored in the Terminal Office when not in use.
- There are two (2) base station radios: one in the Control Room and one in the Dock House for communications with other terminal personnel at the Facility. There are three (3) marine band (VHF) intrinsically-safe portable radios with chargers at the Dock House for communications with vessels, as well as the US Coast Guard.
- There are a minimum of ten (10) landlines telephones available in the Terminal Office. There are also two (2) fax machines, and computers with intranet / /internet connectivity (land line and wireless connectivity) for communications. Landline and cellular telephones are the principal means of communication with parties outside the Terminal.
- In addition, the Terminal Manager, Corporate Support Personnel and many facility personnel have cellular telephones (not intrinsically safe) that may be used within the Terminal Office or outside the facility for notifications and additional communications capacity.
- Additional communications equipment is available through the OSROs.

Normal Company communications to each facility are conducted via telephone lines, cellular telephones, two way radios, e-mail, and fax machines. Communications between personnel within the Facility are conducted using the direct communications feature on the cellular telephones or via portable radios.

Additional communications equipment (VHF portable radios with chargers and accessories, command post with UHF, VHF, single sideband, marine, aeronautical, telephone, and landline capability) may be provided by the Company or leased from an OSRO or a communications company in the area. Communications with government agencies, state police, and contractors can be conducted via portable radios and cellular or landline telephones. Refer to **FIGURE 7.1-3** for guidelines to set up communications.

IT IS THE RESPONSIBILITY OF THE QUALIFIED INDIVIDUAL TO PROVIDE AN ADEQUATE COMMUNICATIONS SYSTEM. THE COMMUNICATIONS PLAN, WRITTEN AT THE TIME OF AN INCIDENT, WILL IDENTIFY TELEPHONE NUMBERS AND RADIO FREQUENCIES USED BY RESPONDERS. THIS ALSO MAY INVOLVE ACTIVATION OF MULTIPLE TYPES OF COMMUNICATIONS EQUIPMENT AND COORDINATION AMONG MULTIPLE RESPONDING AGENCIES AND CONTRACTORS.

FIGURE 7.1-3 - COMMUNICATIONS CHECKLIST

COMMUNICATIONS CHECKLIST	INITIALS	DATE/TIME STARTED	DATE/TIME COMPLETED
Develop a Communications Plan.			
Ensure adequate phone lines per staff element - contact local provider.			
Ensure adequate fax lines - contact local provider.			
Internet access necessary?			
Ensure recharging stations for cellular phones.			
VHF radio communications: • Establish frequencies • Assign call signs • Distribute radios • Establish communications schedule			
Ensure recharging stations for VHF radios.			
Determine need for VHF repeaters.			
Ensure copy machine available.			
Ensure communications resource accountability.			
Ensure responders have capability to communicate with aircraft.			

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

7.2 SITE SECURITY MEASURES

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[redacted]	[redacted]
[redacted]	[redacted]
[redacted]	[redacted]

7.3 WASTE MANAGEMENT

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

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

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

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

Good hazardous waste management includes:

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

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

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

7.3 WASTE MANAGEMENT, CONTINUED

- Proper disposal, and
- Minimization of present and future environmental liability.

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

- Storage,
- Waste segregation,
- Packaging, and
- Transportation.

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

A general flow chart for waste management guidelines is provided in **FIGURE 7.3-1**. An overall checklist for containment and disposal is provided in **FIGURE 7.3-2**.

FIGURE 7.3-1 - WASTE MANAGEMENT FLOW CHART

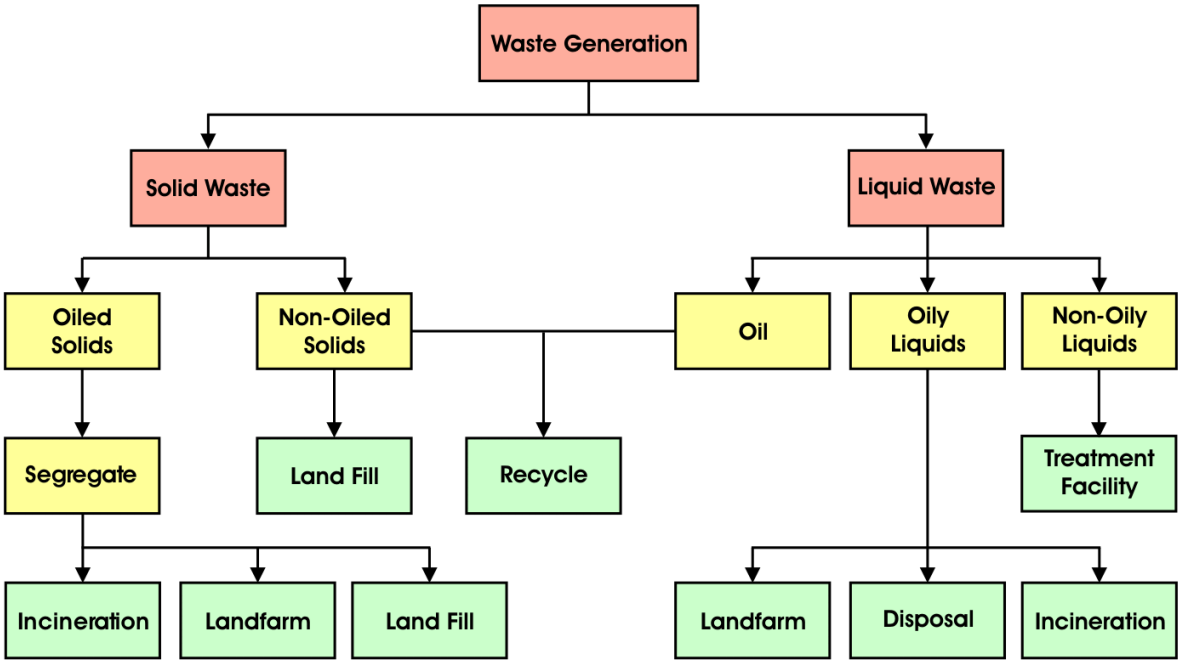

FIGURE 7.3-2 - GENERAL WASTE CONTAINMENT AND DISPOSAL CHECKLIST

CONSIDERATION	YES/NO/NA
Is the material being recovered a waste or reusable product?	

Has all recovered waste been containerized and secured so there is no potential for further leakage while the material is being stored?	
Has each of the discrete waste streams been identified?	
Has a representative sample of each waste stream been collected?	
Has the sample been sent to an approved laboratory for the appropriate analysis, (i.e., hazardous waste determination)?	
Has the appropriate waste classification and waste code number(s) for the individual waste streams been received?	
Has a temporary EPA identification number and generator number(s) been received if they are not already registered with EPA?	
Have the services of a registered hazardous waste transporter been contracted if waste is hazardous?	
If the waste is nonhazardous, is the transporter registered?	
Is the waste being taken to an approved disposal site?	
Is the waste hazardous or Class I nonhazardous?	
If the waste is hazardous or Class I nonhazardous, is a manifest being used?	
Is the manifest properly completed?	
Are all federal, state, and local laws/regulations being followed?	
Are all necessary permits being obtained?	
Has a Disposal Plan been submitted for approval/review?	
Has PPE and waste-handling procedures been included in the Site Safety and Health Plan to protect the health and safety of waste handling personnel?	

7.3.1 Storage

During an oil spill, the volume of oil that can be recovered depends on the storage capacity available. Typical short-term (temporary) storage methods are provided in FIGURE 7.3-3. If storage containers such as bags or drums are used, the container should be clearly marked and/or color-coded to indicate the type of material or waste contained and/or the ultimate disposal option.

FIGURE 7.3-3 - TEMPORARY STORAGE METHODS

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

Roll top rolloff	X	X	X	X	X	X	15-25 yd^3
Vacuum box	X	X					15-25 yd^3
Frac tank	X	X					500-20,000 gal
Poly tank	X	X					200-4,000 gal
Vacuum truck	X	X	X				2,000-5,000 gal
Tank trailer	X	X					2,000-4,000 gal
Barge	X	X					3,000+ gal
Berm, 4 ft		X	X	X	X	X	1 yd^3
Bladders	X	X					25-1,500 gal

FIGURE 7.3-4 - FACILITY-SPECIFIC DISPOSAL LOCATIONS

MATERIAL	DISPOSAL FACILITY	LOCATION
Recovered Product	All recovered product will be contained within the Terminal secondary containment structures or in excess on-site tankage for immediate removal by a third party contract service. This contractor will be appropriately licensed to remove and transport the recovered product, and maintains a valid Special Waste Hauling Permit or Uniform Hazardous Waste Hauling Permit. The contactor will transport special waste to an appropriately licensed or permitted disposal/recovery facility that maintains an Operating Permit Hazardous wastes will be transported to an appropriately licensed or permitted disposal facility that maintains a RCRA Part B Permit.	BP has assembled lists of approved waste disposal facilities that may be used for hazardous and non-hazardous waste disposal. The facilities on the approved lists have been inspected by WasteTrak to evaluate compliance with waste management regulations (local, state, and federal) and have been found to present low or minimal environmental risk to BP due to strict compliance with existing regulations. All waste disposal associated with a petroleum product release from the Terminal would be directed to one or more of these approved disposal facilities. WasteTrak's list of disposal facilities can be found at: https://www.wastetrak.com/security/login.asp. BP Terminal Mangers and ECs have the required login information. In addition, Heritage Environmental Services LLC has approved sites for disposal and indemnifies BP if these sites are used.
	Contaminated soil will be excavated by a licensed contractor and subsequently transported by a licensed waste hauler who maintains a valid Special Waste Hauling Permit	

Contaminated Soil	or Uniform Hazardous Waste Hauling Permit.. The contactor will transport special waste to an appropriately licensed or permitted disposal/recovery facility that maintains an Operating Permit Hazardous wastes will be transported to an appropriately licensed or permitted disposal facility that maintains a RCRA Part B Permit.	see above
Contaminated Equipment	Contaminated equipment will be decontaminated for reuse when practicable. If decontamination is not possible, contaminated equipment will be contained in United States Department of Transportation (USDOT) approved containers for transport by a licensed contractor/waste hauler who maintains a valid Special Waste Hauling Permit or Uniform Hazardous Waste Hauling Permit. The contactor will transport special waste to an appropriately licensed or permitted disposal/recovery facility that maintains an Operating Permit Hazardous wastes will be transported to an appropriately licensed or permitted disposal facility that maintains a RCRA Part B Permit.	see above

FIGURE 7.3-4 - FACILITY-SPECIFIC DISPOSAL LOCATIONS

MATERIAL	DISPOSAL FACILITY	LOCATION
Personnel Protective Equipment	Contaminated PPE will be decontaminated for reuse when practicable. If decontamination is not possible, contaminated PPE will be contained in USDOT approved containers for transport by a licensed contractor/waste hauler who maintains a valid Special Waste Hauling Permit or	see above

	Uniform Hazardous Waste Hauling Permit. The contactor will transport special waste to an appropriately licensed or permitted disposal/recovery facility that maintains an Operating Permit Hazardous wastes will be transported to an appropriately licensed or permitted disposal facility that maintains a RCRA Part B Permit.	
Decontamination Solutions	Decontamination solutions will be contained in USDOT approved containers for transport by a licensed contractor/waste hauler who maintains a valid Special Waste Hauling Permit or Uniform Hazardous Waste Hauling Permit issued. The contactor will transport special waste to an appropriately licensed or permitted disposal/recovery facility that maintains an Operating Permit Hazardous wastes will be transported to an appropriately licensed or permitted disposal facility that maintains a RCRA Part B Permit.	see above
Adsorbents and Spent Chemicals	Absorbents will be contained in USDOT approved containers for transport by a licensed contractor/waste hauler who maintains a valid Special Waste Hauling Permit or Uniform Hazardous Waste Hauling Permit. The contactor will transport special waste to an appropriately licensed or permitted disposal/recovery facility that maintains an Operating Permit Hazardous wastes will be transported to an appropriately licensed or permitted disposal facility that maintains a RCRA Part B Permit. Spent chemicals will be contained in USDOT approved containers for transport by a licensed contractor/waste hauler who maintains a valid Special Waste Hauling Permit or Uniform Hazardous Waste Hauling Permit. The contactor will transport special	see above

	waste to an appropriately licensed or permitted disposal/recovery facility that maintains an Operating Permit Hazardous wastes will be transported to an appropriately licensed or permitted disposal facility that maintains a RCRA Part B Permit.	

7.4 PUBLIC AFFAIRS

This section contains guidelines for dealing with the media during an emergency. The Incident Commander will play a key role in providing the initial public assessment and taking the first steps to provide the Company's public response. Information in this section includes:

- Guidelines for dealing with the media
- Media Incident Fact Sheet (**FIGURE 7.4-1**)

GUIDELINES FOR DEALING WITH THE MEDIA

- You as a Company Manager are the most logical person for reporters to seek out for information.
- Reporters will look elsewhere to find out what happened if you do not answer their questions; however, if you do not have this information or are not prepared to answer a particular question, say so then say when they can expect the answers to their questions (such as one hour).
- It is important to be courteous to all media representatives and to provide a safe place for them to wait until a Company representative can meet them; you may need to provide an initial statement.

Provide	• A brief, general description of what happened and • Steps being taken to handle the emergency.
Don't provide	• Names of deceased or seriously injured employees until the next of kin have been notified, • Speculation about the cause of the emergency, • Any statement implying personal or company negligence, • Number of injured or killed, if known, or • Cost estimates of damage.
Other considerations	• Safety considerations should always receive priority in determining access to Company property. • Anticipate likely questions.

- There are only six questions that can be asked about any subject: who, what, when, where, why, and how.
- Keep answers short and understandable.
- Answer only the question that is asked by the reporter.
- Give the most important facts first.

7.4 PUBLIC AFFAIRS, CONTINUED

Other considerations, continued:

- Talk to the public's concern about the incident, such as whether these were deaths, injuries, any threat to the public, or danger of explosion or fire.
- If you don't know the answer to a question, don't be afraid to say "I don't know"; make note of the question and tell the reporter that you will try to get the answer for him - then do it.
- Don't be defensive.
- There is no such thing as "talking off the record"; assume that anything and everything you say to a reporter is going to be printed and/or used in the story.
- Avoid "What If?" or speculative questions; these questions should be answered with a restatement of the problem and what is being done to control it.
- Don't speculate about the cause of the incident.
- Don't minimize the situation.

FIGURE 7.4-1 - MEDIA INCIDENT FACT SHEET

What occurred:
When (time):
Where (location):
What are hazards:
How is the situation being handled:
What agencies have been notified: **All necessary agencies have been notified.**

Has outside help been requested: **All necessary assistance has been requested.**
Is there danger to the plant:
Is there danger to the community:
What:
Is there an environmental hazard:
What is the environmental hazard:
What is being done to minimize environmental threat: **All appropriate actions to protect the environment are being taken.**
Is there a need for evacuation:

SECTION 8 Last revised: March 2012

DEMOBILIZATION / POST-INCIDENT REVIEW

8.1 TERMINATING THE RESPONSE

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

8.2 DEMOBILIZATION

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

FIGURE 8.2-1 - DEMOBILIZATION CHECKLIST

DEMOBILIZATION CHECKLIST	INITIALS	DATE/TIME STARTED	DATE/TIME COMPLETED
Assign personnel to identify surplus resources and probable release times.			
Establish demobilization priorities.			
Develop decontamination procedures.			
Initiate equipment repair and maintenance.			
Develop a Disposal Plan.			
Identify shipping needs.			
Identify personnel travel needs.			
Develop impact assessment and statements.			
Obtain concurrence of Planning and Operations Group Leaders before release of personnel or			

equipment.			

8.3 POST-INCIDENT REVIEW

All facility personnel involved in the incident shall be debriefed (by the Company) within 24 hours after termination of operations. The primary purpose of the post-incident review is to identify actual or potential deficiencies in the Plan and determine the changes required to correct the deficiencies. The post-incident review also is 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 also should be used for evaluating training drills or exercises. Key agency personnel that were involved in the response will be invited to attend the post-incident review. An Emergency Response or Drill Form is provided in **FIGURE 8.3-1**. Results of the review are forwarded to the Company within 90 days following completion of response and cleanup procedures.

FIGURE 8.3-1 - EMERGENCY RESPONSE OR DRILL FORM

☐ EXERCISE ☐ ACTUAL EVENT

Date & Time Convened:

1. Operations Director reviews facts of incident.

(Type, Group Security (Terrorist Act?), Safety, Surroundings, Commodity, Volume Spilled (if spill), Weather)

Obtain topographical map of area from engineering.

Actions Taken:

Level: 1 2 3

2. Is there anything that must be done prior to adjournment?

3. Who is on the scene? (Company reps, others, i.e., fire, police, ambulance)

Who is the incident commander?

Phone Numbers:

Where is the command post?

Phone Numbers:

Who is BST Liaison with Incident Command?

Phone Numbers:

Request BST be included by speakerphone during EOC Unified Command meetings

FIGURE 8.3-1 - EMERGENCY RESPONSE OR DRILL FORM, CONTINUED

4. Is there a need to contact the Incident Management Teams?

Contact: a. IMT _____
b. BART _____

5. Who (if anyone) has already been dispatched to the scene from Lisle/Chicago?

6. Who else should go to the scene ASAP?

7. Does an all-BP number need to be set up for notification purposes?

8. Next meeting at?

8.3.1 Final Spill Cleanup Report

A final, comprehensive report shall be prepared by the Incident Commander or his designee after completion of spill cleanup activities for internal use. It should be written in the narrative form and include the information listed below (as appropriate):

- Time, location, and date of discharge;
- Type of material discharged;
- Quantity discharged (indicate volume, color, length and width of slick, and rate of release if continuous);
- Source of spill (tank, flowline, etc.) in which the oil was originally contained, path of discharge, and impact area;
- Detailed description of what actually caused the discharge and actions taken to control or stop the discharge;
- Description of damage to the environment;
- Steps taken to clean up the spilled oil along with dates and times steps were taken;
- The equipment used to remove the spilled oil, dates, and number of hours equipment was used;
- The number of persons employed in the removal of oil from each location, including their identity, employer, and the number of hours worked at that location;
- Actions by the Company or contractors to mitigate damage to the environment;
- Measures taken by the Company or contractors to prevent future spills;
- The federal and state agencies to which the Company or contractors reported the discharge; show the agency, its location, the date and time of notification, and the official contacted;
- Description of the effectiveness of equipment and cleanup techniques and recommendations for improvement;
- The names, addresses, and titles of people who played a major role in responding to the event;
- A section identifying problems and deficiencies noted during the response event; a follow-up section should include recommended procedure modifications to make a future response more effective and efficient; and
- All other relative information.

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APPENDICES

A. TRAINING / EXERCISES

B. CONTRACTOR RESPONSE EQUIPMENT

C. TANK TABLES, COMPANY FORMS, AND PLOT PLANS

D. HAZARD EVALUATION AND RISK ANALYSIS

E. CROSS-REFERENCES

F. ACRONYMS AND DEFINITIONS

G. ADDITIONAL INFORMATION

APPENDIX A Last revised: July 2008

TRAINING / EXERCISES

A.1 EXERCISE REQUIREMENTS AND SCHEDULES

- The Company participates in the National Preparedness for Response Exercise Program (PREP).
- During each triennial cycle, all components of the Plan (**FIGURE A.1-1**) must be exercised at least once.
- The local Manager/Team Leader is responsible for the following aspects:
    - Adherance to BU's training/exercise program,
    - Scheduling,
    - Assignment of ICS (Incident Command System) roles,
    - Post-drill evaluation/debrief/improvements, and
    - Maintenance of records (documentation).
- FIGURE A.1-2 provides descriptions of exercise requirements, FIGURE A.1-3 provides an Emergency Response or Drill Form.

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

CORE COMPONENTS	DESCRIPTION
1. Notifications	Test the notifications procedures identified in the asset Emergency Response Plan (FRP/ACP).
2. Staff mobilization	Demonstrate the ability to assemble the response organization identified in the asset Emergency Response Plan (FRP/ACP).
3. Ability to operate within the response management system described in the Plan:	
• Unified Command	Demonstrate the ability of the spill response organization to work within a unified command.
• Response management system	Demonstrate the ability of the response organization to operate within the Incident Command System (ICS) response management system identified in the respective plans.
4. Discharge control	Demonstrate the ability of the response organization to control and stop the discharge at the source.
5. Assessment	Demonstrate the ability of the response organization to provide initial assessment of the discharge and provide continuing assessments of the effectiveness of the tactical operations.
6. Containment	Demonstrate the ability of the response organization to contain the discharge at the source or in various locations for recovery operations.
7. Recovery	Demonstrate the ability of the response organization to recover the discharged product.
8. Protection	Demonstrate the ability of the response organization to

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

FIGURE A.1-2 - EXERCISE REQUIREMENTS

EXERCISE TYPE	EXERCISE CHARACTERISTICS
Facility/QI notification	• Conducted quarterly. • Asset initiates mock spill notification to QI. • Asset documents time/date of notification, name, and phone number of individual contacted. • Use PREP Exercise Documentation Form in FIGURE A.1-5.
Equipment deployment	• Conducted semiannually if Company owns equipment. (e.g. boat, boom, skimmer, not absorbents) • Response contractors listed in the plan must participate in annual deployment exercise. • Use PREP Exercise Documentation Form in FIGURE A.1-4.
Facility Tactical Response Team tabletop	• Conducted annually. • Tests team's response activities/responsibilities. • Notify the appropriate agencies. • Documents Plan's effectiveness. • Must exercise worst case discharge scenario once every three years. • Must test all Plan components at least once every three years. • Drill documentation will be filed at the asset. • All facility table top supporting documentation

	will be stored on-site.
Unannounced	• Company will either participate in unannounced tabletop exercise or equipment deployment exercise on an annual basis, if selected. • Company may take credit for participation in government initiated unannounced drill in lieu of drill required by PREP guidelines, if passed. • Plan holders who have participated in a PREP government-initiated unannounced exercise will not be required to participate in another one for at least 36 months from the date of the exercise if the Company passes the exercise.
Area	• An industry plan holder that participates in an Area Exercise would not be required to participate in another Area Exercise for a minimum of six years if the Company passes the exercise.
OTHER EXERCISE CONSIDERATIONS	
Drill program evaluation procedures	• Company conducts post-exercise meetings to discuss positive items, areas for improvement, and to develop action item checklist to be implemented later.
Records of drills	• Company will maintain exercise records for five years following completion of each exercise. • Records will be made available to applicable agencies upon request. • Company will verify appropriate records are kept for each spill response contractor listed in Plan as required by PREP guidelines (annual equipment deployment drill, triennial unannounced drill, etc.).

FIGURE A.1-3 - EMERGENCY RESPONSE OR DRILL FORM

Three Year Oil Pollution Act of 1990 Drill Log

Facility Name: _____

Location: _____

Drill Type	**Document Completed Drills with Drill Date and Initials**		
	Year _____	Year _____	Year _____

QI Notification Drill			
1st Qtr			
2nd Qtr			
3rd Qtr			
4th Qtr			
Annual PREP Tabletop Exercise (indicate scenario type: Small, Medium or Worst Case)			
Agency/OSRO Telephone Notification Drill			
1st Half of Year			
2nd Half of Year			
Facility Owned Equipment Deployment			
1st Half of Year			
2nd Half of Year			
Contractor Owned Equipment Deployment (obtain documentation annually)			
Agency Unannounced Drill (As requested)			
Area Exercise (As requested)			

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FIGURE A.1-4 - EPA REQUIRED RESPONSE EQUIPMENT TESTING AND DEPLOYMENT DRILL LOG

The following form will be used to document containment boom deployments, but other forms may be used to document inspections. Refer to **SECTION 7.1.2** for additional Information on

response equipment inspections and testing. Response equipment inspections records are maintained in the Facility office for at least five (5) years. Refer to the Facility Response Plan **APPENDIX G** for samples of completed response equipment inspection forms and **APPENDIX H** for copies of blank response equipment inspection forms.

Item:	Date of Last Update:
ACTIVITY	**INFORMATION**
Last inspection or response equipment test date	
Inspection frequency	
Last deployment drill date	
Deployment frequency	
OSRO Certification (if applicable)	

Item:	Date of Last Update:
ACTIVITY	**INFORMATION**
Last inspection or response equipment test date	
Inspection frequency	
Last deployment drill date	
Deployment frequency	
OSRO Certification (if applicable)	

Item:	Date of Last Update:
ACTIVITY	**INFORMATION**
Last inspection or response equipment test date	
Inspection frequency	
Last deployment drill date	
Deployment frequency	
OSRO Certification (if applicable)	

Item:	Date of Last Update:
ACTIVITY	**INFORMATION**
Last inspection or response equipment test date	
Inspection frequency	
Last deployment drill date	
Deployment frequency	
OSRO Certification (if applicable)	

FIGURE A.1-5 - QUALIFIED INDIVIDUAL NOTIFICATION DRILL LOG

Records are maintained on-site. Refer to **APPENDIX G** for samples of completed forms.

Company:	Date:
ACTIVITY	**INFORMATION**
Qualified Individual(s) Contacted	
Others Contacted	
Emergency Scenario	
Evaluation	
Changes to be Implemented	
Time Table for Implementation	

Company:	Date:
ACTIVITY	**INFORMATION**
Qualified Individual(s) Contacted	
Others Contacted	
Emergency Scenario	
Evaluation	
Changes to be Implemented	
Time Table for Implementation	

Company:	Date:
ACTIVITY	**INFORMATION**
Qualified Individual(s) Contacted	
Others Contacted	
Emergency Scenario	
Evaluation	
Changes to be Implemented	
Time Table for Implementation	

Company:	Date:
ACTIVITY	**INFORMATION**
Qualified Individual(s) Contacted	
Others Contacted	
Emergency Scenario	
Evaluation	

Changes to be Implemented	
Time Table for Implementation	

FIGURE A.1-6 - RESPONSE EQUIPMENT INSPECTION FORM

Note that other inspection forms may be used. Refer to **SECTION 7.1.2** for additional Information on response equipment inspections and testing. Response equipment inspections records are maintained in the Facility office for at least five (5) years. Refer to **APPENDIX G** for samples of completed response equipment inspection forms.

INSPECTOR	DATE	COMMENTS

A.2 TRAINING PROGRAM

FIGURE A.2-1 provides training requirements for spill responders. **FIGURE A.2-2** provides the program matrix. **FIGURE A.2-3** provides a personnel response training log.

FIGURE A.2-1 - TRAINING REQUIREMENTS

TRAINING TYPE	TRAINING CHARACTERISTICS
Training in use of spill response plan	• All field personnel will be trained to properly report/monitor spills. • Plan will be reviewed annually with all employees and contract personnel. • The Personnel Response Training Log is located in **FIGURE A.2-3**.
OSHA training requirements	• All Company responders designated in Plan must have 24 hours of initial spill response training. • Laborers having potential for minimal exposure must have 24 hours of initial oil spill response instruction and eight hours of actual field experience. • Spill responders having potential exposure to hazardous substances at levels exceeding permissible exposure limits must have 40 hours of initial training off-site and 24 hours of actual field experience. • On-site management/supervisors required to receive same training as equipment operators/general laborers plus eight hours of specialized hazardous waste management training. • Managers/employees require eight hours of annual refresher training.
Incident Management Team personnel training	• See recommended PREP Training Progam Matrix (FIGURE A.2-2).
Training for casual laborers or volunteers	• Company will not use casual laborers/volunteers for operations requiring HAZWOPER training.
Wildlife	• Only trained personnel approved by USFWS and appropriate state agency will be used to treat oiled wildlife.
Training documentation and record	• Training activity records will be retained five

maintenance	years for all personnel following completion of training. • Company will retain training records indefinitely for individuals assigned specific duties in the Plan. • Training records will be retained at each facility or pipeline office; Supervisor/Area Manager will document all applicable training.

FIGURE A.2-2 - RECOMMENDED PREP TRAINING PROGRAM MATRIX

TRAINING ELEMENT	QUALIFIED INDIVIDUAL (QI)	INCIDENT MANAGEMENT TEAM (IMT)	FACILITY PERSONNEL
Captain of the Port (COTP) Zones or Environmental Protection Agency (EPA) Regions in which the facility is located	x	x	x
Notification procedures and requirements for facility owners or operators; internal response organizations; federal and state agencies; and contracted Oil Spill Removal Organizations (OSROs) and the information required for those organizations	x	x	x
Communication system used for the notifications	x	x	x
Information on the products stored, used, or transferred by the facility, including familiarity with the material safety data sheets (MSDS), special handling procedures, health and safety hazards, spill and other applicable response procedures	x	x	x
Procedures the facility personnel may use to mitigate or prevent any discharge or a substantial threat of a discharge of oil resulting from facility operational activities associated with internal or external cargo transfers, storage, or use	x		x
Facility personnel responsibilities and procedures for use of facility equipment which may be available to mitigate or prevent an oil discharge	x		x
Operational capabilities of the contracted OSRO's to respond small, medium, and large discharges	x	x	x
Responsibilities and authority of the Qualified Individual (QI) as described in	x	x	x

the Spill Response Plan and Company response organization			
The ICS organization structure that will be used to manage the response actions including: • Command and control • Public information • Safety • Liaison with government agencies • Spill response operations • Planning • Logistics support • Finance	x	x	x
The responsibilities and duties of each Incident Management Team (IMT) within the organization structure	x	x	
The drill and exercise program to meet federal and state regulations as required under Oil Pollution Act of 1990 (OPA 90)	x	x	x
The role of the QI in the post discharge review of the Plan to evaluate and validate its effectiveness	x		

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

TRAINING ELEMENT	QUALIFIED INDIVIDUAL (QI)	INCIDENT MANAGEMENT TEAM (IMT)	FACILITY PERSONNEL
The Area Contingency Plan (ACP) for the area in which the facility is located	x	x	x
The National Contingency Plan (NCP)	x	x	x
Roles and responsibilities of federal and state agencies in pollution response	x	x	x
Available response resources identified in the Plan	x	x	x
Contracting and ordering procedures to acquire OSRO resources identified in the Plan	x	x	
OSHA requirements for worker health and safety (29 CFR 1910.120)	x	x	x
Incident Command System/Unified Command System	x	x	x
Public affairs	x	x	x
Crisis management	x	x	x
Procedures for obtaining approval for dispersant use or in-situ burning of the	x	x	

spill			
Oil spill trajectory analyses	x	x	
Sensitive biological areas	x	x	x
This training procedure as described in the Plan for members of the IMT		x	
Procedures for the post discharge review of the plan to evaluate and validate its effectiveness	x	x	x
Basic information on spill operations and oil spill clean-up technology including: • Oil containment • Oil recovery methods and devices • Equipment limitations and uses • Shoreline cleanup and protection • Spill trajectory analysis • Use of dispersants, in-situ burning, bioremediation • Waste storage and disposal considerations		x	
Hazard recognition and evaluation	x	x	x
Site safety and security procedures	x	x	x
Personnel management, as applicable to designated job responsibilities	x	x	x

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

TRAINING ELEMENT	**QUALIFIED INDIVIDUAL** (QI)	**INCIDENT MANAGEMENT TEAM (IMT)**	**FACILITY PERSONNEL**
Procedures for directing the deployment and use of spill response equipment, as applicable to designated job responsibilities	x	x	x
Specific procedures to shut down affected operations	x		x
Procedures to follow in the event of discharge, potential discharge, or emergency involving the following equipment or scenarios: • Tank overfill • Tank rupture • Piping or pipeline rupture • Piping or pipeline leak, both under pressure or not under pressure, if applicable	x		x

Explosion or fire • Equipment failure • Failure of secondary containment system			
QI's name and how to contact him or her	x		x

FIGURE A.2-3 - PERSONNEL RESPONSE TRAINING LOG

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

Note: Records are maintained on-site. See VTA, for training history. Refer to **APPENDIX G** for additional information.

APPENDIX B Last revised: March 2012

CONTRACTOR RESPONSE EQUIPMENT

B.1 COOPERATIVES AND CONTRACTORS

The Company has contracted with additional Oil Spill Removal Organizations (OSROs) to provide personnel and equipment in the event of a spill. The classification, response capabilities and equipment are described below. Evidence of contracts and equipment lists are included in **FIGURE B.1-1**.

B.1.1 OSRO Classification

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

The following is a listing of the USCG classified OSROs within this Zone that may respond to incidents at this Facility in this Plan. For a detailed listing of USCG classified OSROs and other contractors, refer to **FIGURE 3.1-4** and **FIGURE 7.1-1**.

COMPANY / CONTRACTOR	APPLICABLE COPT ZONE (S)	USCG CLASSIFICATIONS	RESPONSE TIME
Atlantic Response Inc. 760 Roosevelt Avenue Carteret NJ 07008	New York	Facilities: MM, W1, W2, W3 — Vessels: MM, W1, W2, W3 River/Canal: ✓ ✓ Inland: ✓ ✓ Open Ocean: Offshore: Nearshore: Great Lakes:	0.5 hours
Clean Harbors Cooperative 4601 Tremley Point Road Linden NJ 07036	New York	Facilities: MM, W1, W2, W3 — Vessels: MM, W1, W2, W3 River/Canal: ✓ ✓ ✓ ✓ ✓ ✓ ✓ ✓ Inland: ✓ ✓ ✓ ✓ ✓ ✓ ✓ ✓ Open Ocean: Offshore: Nearshore: Great Lakes:	1 hours
Marine Spill Response Corporation (MSRC) 120 Fieldcrest Ave. Edison NJ 08873	New York	Facilities: MM, W1, W2, W3 — Vessels: MM, W1, W2, W3 River/Canal: ✓ ✓ ✓ ✓ ✓ ✓ ✓ ✓ Inland: ✓ ✓ ✓ ✓ ✓ ✓ ✓ ✓ Open Ocean: ✓ ✓ ✓ ✓ ✓ ✓ ✓ ✓ Offshore: ✓ ✓ ✓ ✓ ✓ ✓ ✓ Nearshore: ✓ ✓ ✓ ✓ ✓ ✓ ✓	2 hours

		Great Lakes								

FIGURE B.1-1 - EVIDENCE OF CONTRACTS

(All contracts are evergreen and therefore do not expire.)

- Atlantic Response Inc., Carteret, NJ
- Clean Harbors Cooperative, Linden, NJ
- Marine Spill Response Corporation (MSRC), Edison, NJ

APPENDIX C Last Revised: October 2012

TANK TABLES, COMPANY FORMS AND PLOT PLANS

FIGURE C-1 - TANK TABLES

FIGURE C-8 Spill History has information on any spills from tank failures. Additional information on secondary containment, including supporting calculations, is provided in the SPCC Plan. Secondary containment at the Facility is considered to be sufficiently impervious to contain discharged oil until clean up occurs.

Container/ Source	Failure/Cause	Total Shell Capacity (gal)	Secondary Containment Volume Type (gal)	Tank Type	Year Constructed/ Installed	Quantity Stored (gal)	Direction of Flow/Rate (See Site Drainage Diagram)	Product Stored
ABOVEGROUND CONTAINERS - Total: (b) (7)(F)								
10 (DOT)	Overfill / Rupture / Leakage	(b) (7)(F)		Internal Floating Roof	1979	(b) (7)(F)	East / Instantaneous	Gasoline
11 (DOT)	Overfill / Rupture / Leakage			Cone	1922		East / Instantaneous	Distillate
14 (DOT)	Overfill / Rupture / Leakage			Cone	1979		East / Instantaneous	Distillate
15 (DOT)	Overfill / Rupture / Leakage			Cone	1979		East / Instantaneous	Distillate
16 (DOT)	Overfill / Rupture / Leakage			External Floating Roof with Dome	1955		East / Instantaneous	Gasoline
17 (DOT)	Overfill / Rupture / Leakage			Internal Floating Roof	1923		East / Instantaneous	Gasoline
18 (DOT)	Overfill / Rupture / Leakage			Cone with Internal Alum Floater	1923		East / Instantaneous	Gasoline
19 (DOT)	Overfill / Rupture / Leakage			Cone with Internal Alum Floater	1923		East / Instantaneous	Gasoline
23 (DOT)	Overfill / Rupture / Leakage			External Floating Roof with Dome	1955		East / Instantaneous	Gasoline
25	Overfill / Rupture /			Cone with	1923		East / Instantaneous	Denatured Ethanol /

	Leakage			Internal Alum Floater				Gasoline

* Not in Containment Area ** Curbing and containment system

Containment Type: 1-Earthen Berm and Floor, 2-Concrete Berm and Floor, 3-Metal Berm and Floor, 4-Portable Containment or Inside Building, 5-Double Walled, 6-Lined Earthen Berms and Floor

FIGURE C-1 - TANK TABLES , CONTINUED

FIGURE C-8 Spill History has information on any spills from tank failures. Additional information on secondary containment, including supporting calculations, is provided in the SPCC Plan. Secondary containment at the Facility is considered to be sufficiently impervious to contain discharged oil until clean up occurs.

Container/ Source	Failure/Cause	Total Shell Capacity (gal)	Secondary Containment Volume Type (gal)	Tank Type	Year Constructed/ Installed	Quantity Stored (gal)	Direction of Flow/Rate (See Site Drainage Diagram)	Product Stored
ABOVEGROUND CONTAINERS - (b) (7)(F)								
26 (DOT)	Overfill / Rupture / Leakage	(b) (7)(F)		Cone	1923	(b) (7)(F)	East / Instantaneous	Distillate
27 (DOT)	Overfill / Rupture / Leakage			Cone	1923		East / Instantaneous	Distillate
28 (DOT)	Overfill / Rupture / Leakage			Cone	1923		East / Instantaneous	Distillate
70 (DOT)	Overfill / Rupture / Leakage			Internal Floating Roof	1940		East / Instantaneous	Gasoline
71 (DOT)	Overfill / Rupture / Leakage			Internal Floating Roof	1940		East / Instantaneous	Gasoline
95 (DOT)	Overfill / Rupture / Leakage			External Floating Roof with Dome	1947		East / Instantaneous	Gasoline
96 (DOT)	Overfill / Rupture / Leakage			Internal Floating Roof	2004		East / Instantaneous	Gasoline
Fire Pump Fuel Tank	Overfill / Rupture / Leakage			Horizontal	Unknown		East / Instantaneous	Fire Pump Fuel Tank
Rack Slop Tank	Overfill / Rupture /			Horizontal	2006		East / Instantaneous	Slop

	Leakage							
ADDITIVE CONTAINER		(b) (7)(F) (b) (7)(F)						
A-28	Overfill / Rupture / Leakage			Horizontal	2001	(b)	East / Instantaneous	Tank Water Bottom

* Not in Containment Area ** Curbing and containment system

Containment Type: 1-Earthen Berm and Floor, 2-Concrete Berm and Floor, 3-Metal Berm and Floor, 4-Portable Containment or Inside Building, 5-Double Walled, 6-Lined Earthen Berms and Floor

FIGURE C-1 - TANK TABLES , CONTINUED

FIGURE C-8 Spill History has information on any spills from tank failures. Additional information on secondary containment, including supporting calculations, is provided in the SPCC Plan. Secondary containment at the Facility is considered to be sufficiently impervious to contain discharged oil until clean up occurs.

Container/ Source	Failure/Cause	Total Shell Capacity (gal)	Secondary Containment Volume Type (gal)	Tank Type	Year Constructed/ Installed	Quantity Stored (gal)	Direction of Flow/Rate (See Site Drainage Diagram)	Product Stored
ADDITIVE CONTAINERS -		(b) (7)(F) (b) (7)(F)						
A-29	Overfill / Rupture / Leakage			Horizontal	1997	(b) (7)(F)	East / Instantaneous	Diesel Dye
Sample Shed #1	Overfill / Rupture / Leakage			Horizontal	1992		East / Instantaneous	Slop
#4	Overfill / Rupture / Leakage			Horizontal	1995		East / Instantaneous	Recovered Product
10A	Overfill / Rupture / Leakage			Horizontal	2010		East / Instantaneous	Additive
109	Overfill / Rupture / Leakage			Horizontal	2010		East / Instantaneous	Additive
A-7	Overfill / Rupture / Leakage			Horizontal	1986		East / Instantaneous	Gasoline Additive
A-8	Overfill / Rupture / Leakage			Cone	1993		East / Instantaneous	Gasoline Additive
A-21	Overfill / Rupture / Leakage			Horizontal	1996		East / Instantaneous	OWS-1 Slop Tank
A-22	Overfill / Rupture /			Horizontal	1995		East / Instantaneous	Dock Slop Tank

	Leakage							
DRUM STORAGE AREA - Total:								
Storage Area (Adjacent to Tank 96)	Leak / Failure	55 each (up to 12 drums)	Containment Pads	Drums	N/A	(b) (7)	East / Instantaneous	Varies

* Not in Containment Area ** Curbing and containment system

Containment Type: 1-Earthen Berm and Floor, 2-Concrete Berm and Floor, 3-Metal Berm and Floor, 4-Portable Containment or Inside Building, 5-Double Walled, 6-Lined Earthen Berms and Floor

FIGURE C-1 - TANK TABLES , CONTINUED

FIGURE C-8 Spill History has information on any spills from tank failures. Additional information on secondary containment, including supporting calculations, is provided in the SPCC Plan. Secondary containment at the Facility is considered to be sufficiently impervious to contain discharged oil until clean up occurs.

Container/ Source	Failure/Cause	Total Shell Capacity (gal)	Secondary Containment Volume Type (gal)	Tank Type	Year Constructed/ Installed	Quantity Stored (gal)	Direction of Flow/Rate (See Site Drainage Diagram)	Product Stored
OIL - FILLED ELECTRICAL EQUIPMENT - Total:								
XFR-1	Leak / Rupture			Transformer			Southeast / pinhole to catastrophic	Mineral Oil
XFR-2	Leak / Rupture			Transformer			Southeast / pinhole to catastrophic	Mineral Oil
XFR-3	Leak / Rupture			Transformer			Southeast / pinhole to catastrophic	Mineral Oil
XFR-4	Leak / Rupture			Transformer			Southeast / pinhole to catastrophic	Mineral Oil
XFR-5	Leak / Rupture			Transformer			Southeast / pinhole to catastrophic	Mineral Oil
XFR-6	Leak / Rupture			Transformer			Southeast / pinhole to catastrophic	Mineral Oil
XFR-7	Leak / Rupture			Transformer			Southeast / pinhole to catastrophic	Mineral Oil
XFR-8	Leak / Rupture			Transformer			Southeast / pinhole to catastrophic	Mineral Oil

OIL - FILLED MECHANICAL EQUIPMENT - Total:								
none	-			-			-	-
SURFACE IMPOUNDMENTS - Total:								
none	-			-			-	-

* Not in Containment Area ** Curbing and containment system

Containment Type: 1-Earthen Berm and Floor, 2-Concrete Berm and Floor, 3-Metal Berm and Floor, 4-Portable Containment or Inside Building, 5-Double Walled, 6-Lined Earthen Berms and Floor

FIGURE C-1 - TANK TABLES , CONTINUED

FIGURE C-8 Spill History has information on any spills from tank failures. Additional information on secondary containment, including supporting calculations, is provided in the SPCC Plan. Secondary containment at the Facility is considered to be sufficiently impervious to contain discharged oil until clean up occurs.

Container/ Source	Failure/Cause	Total Shell Capacity (gal)	Secondary Containment Volume Type (gal)	Tank Type	Year Constructed/ Installed	Quantity Stored (gal)	Direction of Flow/Rate (See Site Drainage Diagram)	Product Stored
UNDERGROUND CONTAINERS - Total:								
none	-			-			-	-
(b) (7)(F)								

* Not in Containment Area ** Curbing and containment system

Containment Type: 1-Earthen Berm and Floor, 2-Concrete Berm and Floor, 3-Metal Berm and Floor, 4-Portable Containment or Inside Building, 5-Double Walled, 6-Lined Earthen Berms and Floor

FIGURE C-2 - DRAINAGE DIAGRAM

Click here to view - Drainage Diagram 10/17/2012.

FIGURE C-3 - EVACUATION DIAGRAM

Click here to view - Office Evacuation Diagram.

FIGURE C-3 - EVACUATION DIAGRAM, CONTINUED

Click here to view - Evacuation Diagram 10/17/2012.

FIGURE C-4 - DISCHARGE PREVENTION MEETING LOG

Spill Prevention Briefing

- Company personnel are kept knowledgeable of equipment, safety factors, and operating conditions.
- Annual training sessions are conducted by the Terminal Manager to assure oil handling personnel understand the SPCC Plan for the facility. These documented sessions keep personnel informed of their obligation to prevent pollution incidents and to improve spill control and response techniques.

DATE	ATTENDEES

Subject/Issue Identified	Required Action	Implementation Date

Note: Refer to **APPENDIX G** for additional information.

FIGURE C-5 - INSPECTION PROCEDURES

Terminal technicians conduct Rounds to observe the Facility looking for signs of vapor or liquid leaks, damage to equipment, or security concerns at least once per shift in accordance with the BP USPL Rounds Procedures (USPL-INS-820-001). Tank inspections and testing are performed in accordance with the BP USPL Standard Maintenance Procedure (SMP) - Tank Inspection & Maintenance Procedure (USPL-MAN-825-001) and the BP USPL Site Technical Practice - Field Procedures for Tank Inspection Program (PLBU STP 58-208). Secondary containment systems are observed during Rounds and inspected in accordance with the procedures in SMP USPL-MAN-825-001.

In addition to Rounds Inspection, USPL utilizes a facility-risk based monitoring program for piping called the Facility Inspection Program (FIP). The program utilizes an array of non destructive testing inspection techniques based on API 570 or API 2611 which have been incorporated into USPL STP 32-101. Pipe supports are included in the FIP inspections, and are designed to minimize abrasion and corrosion and allow for expansion and contraction.

BP USPL inspection procedures are available on the BP USPL intranet site; additional information on inspection and testing procedures is provided in the SPCC Plan.

Inspection and testing records are maintained with a Computer Maintenance Management System (CMMS, such as Maximo) and/or the tank file in the Facility office. Inspection checklists are managed via Job Plans.

If an oil discharge or signs of damage of distress are observed, this will be reported to the Terminal Manager or Senior Technician and cleaned up / corrected as soon as practicable.

Note: These documents must be retained for five (5) years. Refer to **APPENDIX G** for additional information.

FIGURE C-6 - ANNUAL INSPECTION RECORD

Inspection and testing records are maintained with a Computer Maintenance Management System (CMMS) such as Maximo) and/or records are on file in the Facility office.

(Other versions of this form may be used)

FIGURE C-7 - SECONDARY CONTAINMENT DRAINAGE LOG

Refer to the facility-specific Spill Protection Control Countermeasure (SPCC) Plan for the secondary containment log information.

FIGURE C-8 - REPORTABLE SPILL HISTORY*

Information on reportable spills is documented in the Tr@ction reporting system. Copies of the Tr@ction Spill Reports are presented in **APPENDIX G**.

Date of Discharge(s):	10/28/2010
Location (Equipment or Operations):	Rack pump #2
List of Discharge Causes:	During normal operation, release of gasoline from rack pump #2. 1/4 inch tubing, which is used to cool the pump seal - found to be leaking product.
Material(s) Discharged:	Gasoline
Amount of Discharges in Gallons:	5 (gallons)
Amount That Reached Navigable Waters (if applicable):	()
Effectiveness and Capacity of Secondary Containment:	
Cleanup Actions Taken:	3 gallons recovered
Steps Taken to Reduce Possibility of Reoccurrence:	Repaired rack pump.
Total Oil Storage Capacity of Tank(s) or Impoundment(s) From Which Material Discharged:	()
Enforcement Actions:	No regulatory authorities were notified
Effectiveness of Monitoring Equipment:	
Spill Detection:	
Brief Summary of the Impact of the Spill:	
Geographic Area:	

*Reportable spill, as defined in 40 CFR Part 110, is a discharge of oil that violates applicable water quality standards or a discharge into or upon the navigable waters of the United States or adjoining shorelines in harmful quantities.

FIGURE C-8 - REPORTABLE SPILL HISTORY*, CONTINUED

Information on reportable spills is documented in the Tr@ction reporting system. Copies of the Tr@ction Spill Reports are presented in **APPENDIX G**.

Date of Discharge(s):	09/18/2010
Location (Equipment or Operations):	(b) (7)(F) [redacted]
List of Discharge Causes:	(b) (7)(F) [redacted]

Material(s) Discharged:	Gasoline
Amount of Discharges in Gallons:	425 (gallons)
Amount That Reached Navigable Waters (if applicable):	()
Effectiveness and Capacity of Secondary Containment:	
Cleanup Actions Taken:	200 gallons recovered
Steps Taken to Reduce Possibility of Reoccurrence:	Fixed flow control valve
Total Oil Storage Capacity of Tank(s) or Impoundment(s) From Which Material Discharged:	()
Enforcement Actions:	Fire Department was notified
Effectiveness of Monitoring Equipment:	
Spill Detection:	
Brief Summary of the Impact of the Spill:	
Geographic Area:	

*Reportable spill, as defined in 40 CFR Part 110, is a discharge of oil that violates applicable water quality standards or a discharge into or upon the navigable waters of the United States or adjoining shorelines in harmful quantities.

FIGURE C-8 - REPORTABLE SPILL HISTORY*, CONTINUED

Information on reportable spills is documented in the Tr@ction reporting system. Copies of the Tr@ction Spill Reports are presented in **APPENDIX G**.

Date of Discharge(s):	07/24/2010
Location (Equipment or Operations):	Product line
List of Discharge Causes:	Product line over pressurized causing bolt in strainer basket to break during normal operation
Material(s) Discharged:	Gasoline
Amount of Discharges in Gallons:	65 (gallons)
Amount That Reached Navigable Waters (if applicable):	()

Effectiveness and Capacity of Secondary Containment:	
Cleanup Actions Taken:	40 gallons recovered
Steps Taken to Reduce Possibility of Reoccurrence:	Fixed strainer basket.
Total Oil Storage Capacity of Tank(s) or Impoundment(s) From Which Material Discharged:	()
Enforcement Actions:	Fire Department was notified
Effectiveness of Monitoring Equipment:	
Spill Detection:	
Brief Summary of the Impact of the Spill:	
Geographic Area:	

*Reportable spill, as defined in 40 CFR Part 110, is a discharge of oil that violates applicable water quality standards or a discharge into or upon the navigable waters of the United States or adjoining shorelines in harmful quantities.

FIGURE C-8 - REPORTABLE SPILL HISTORY*, CONTINUED

Information on reportable spills is documented in the Tr@ction reporting system. Copies of the Tr@ction Spill Reports are presented in **APPENDIX G**.

Date of Discharge(s):	05/12/2010
Location (Equipment or Operations):	Below rack 5 vapor recovery arm
List of Discharge Causes:	Spill below rack 5 vapor recovery arm onto concrete containment during normal operation
Material(s) Discharged:	Gasoline
Amount of Discharges in Gallons:	2 (gallons)
Amount That Reached Navigable Waters (if applicable):	()
Effectiveness and Capacity of Secondary Containment:	Spill onto concrete containment
Cleanup Actions Taken:	0 gallons recovered
Steps Taken to Reduce Possibility of Reoccurrence:	Repaired vapor recovery arm.
Total Oil Storage Capacity of	

Tank(s) or Impoundment(s) From Which Material Discharged:	()
Enforcement Actions:	No regulatory authorities were notified
Effectiveness of Monitoring Equipment:	
Spill Detection:	
Brief Summary of the Impact of the Spill:	
Geographic Area:	

*Reportable spill, as defined in 40 CFR Part 110, is a discharge of oil that violates applicable water quality standards or a discharge into or upon the navigable waters of the United States or adjoining shorelines in harmful quantities.

FIGURE C-8 - REPORTABLE SPILL HISTORY*, CONTINUED

Information on reportable spills is documented in the Tr@ction reporting system. Copies of the Tr@ction Spill Reports are presented in **APPENDIX G**.

Date of Discharge(s):	04/27/2010
Location (Equipment or Operations):	(b) (7)(F) [redacted]
List of Discharge Causes:	(b) (7)(F) [redacted]
Material(s) Discharged:	Gasoline
Amount of Discharges in Gallons:	1,092 (gallons)
Amount That Reached Navigable Waters (if applicable):	()
Effectiveness and Capacity of Secondary Containment:	
Cleanup Actions Taken:	800 gallons recovered
Steps Taken to Reduce Possibility of Reoccurrence:	Cleaned valve.
Total Oil Storage Capacity of Tank(s) or Impoundment(s) From Which Material Discharged:	()
Enforcement Actions:	Fire Department was notified
Effectiveness of Monitoring Equipment:	

Spill Detection:	
Brief Summary of the Impact of the Spill:	
Geographic Area:	

*Reportable spill, as defined in 40 CFR Part 110, is a discharge of oil that violates applicable water quality standards or a discharge into or upon the navigable waters of the United States or adjoining shorelines in harmful quantities.

FIGURE C-8 - REPORTABLE SPILL HISTORY*, CONTINUED

Information on reportable spills is documented in the Tr@ction reporting system. Copies of the Tr@ction Spill Reports are presented in **APPENDIX G**.

Date of Discharge(s):	02/23/2010
Location (Equipment or Operations):	Load arms
List of Discharge Causes:	3rd party transport driver cross-connected load arms and caused a compartment to overfill during normal operation
Material(s) Discharged:	Gasoline
Amount of Discharges in Gallons:	60 (gallons)
Amount That Reached Navigable Waters (if applicable):	()
Effectiveness and Capacity of Secondary Containment:	
Cleanup Actions Taken:	50 gallons recovered
Steps Taken to Reduce Possibility of Reoccurrence:	Discussed with driver.
Total Oil Storage Capacity of Tank(s) or Impoundment(s) From Which Material Discharged:	()
Enforcement Actions:	No regulatory authorities were notified
Effectiveness of Monitoring Equipment:	
Spill Detection:	
Brief Summary of the Impact of the Spill:	
Geographic Area:	

*Reportable spill, as defined in 40 CFR Part 110, is a discharge of oil that violates applicable

water quality standards or a discharge into or upon the navigable waters of the United States or adjoining shorelines in harmful quantities.

FIGURE C-8 - REPORTABLE SPILL HISTORY*, CONTINUED

Information on reportable spills is documented in the Tr@ction reporting system. Copies of the Tr@ction Spill Reports are presented in **APPENDIX G**.

Date of Discharge(s):	10/30/2009
Location (Equipment or Operations):	Manway of an aboveground storage tank
List of Discharge Causes:	A leak discovered at the manway of an aboveground storage tank that was returned back to service during normal operation
Material(s) Discharged:	Ultra Low Sulfer Diesel
Amount of Discharges in Gallons:	3 (gallons)
Amount That Reached Navigable Waters (if applicable):	()
Effectiveness and Capacity of Secondary Containment:	
Cleanup Actions Taken:	2 gallons recovered
Steps Taken to Reduce Possibility of Reoccurrence:	Adjusted manway.
Total Oil Storage Capacity of Tank(s) or Impoundment(s) From Which Material Discharged:	()
Enforcement Actions:	No regulatory authorities were notified
Effectiveness of Monitoring Equipment:	
Spill Detection:	
Brief Summary of the Impact of the Spill:	
Geographic Area:	

*Reportable spill, as defined in 40 CFR Part 110, is a discharge of oil that violates applicable water quality standards or a discharge into or upon the navigable waters of the United States or adjoining shorelines in harmful quantities.

FIGURE C-8 - REPORTABLE SPILL HISTORY*, CONTINUED

Information on reportable spills is documented in the Tr@ction reporting system. Copies of the Tr@ction Spill Reports are presented in **APPENDIX G**.

Date of Discharge(s):	06/15/2009
Location (Equipment or Operations):	Rack
List of Discharge Causes:	Failed pump seal at rack during normal operation
Material(s) Discharged:	Gasoline
Amount of Discharges in Gallons:	2,200 (gallons)
Amount That Reached Navigable Waters (if applicable):	()
Effectiveness and Capacity of Secondary Containment:	
Cleanup Actions Taken:	2,000 gallons recovered
Steps Taken to Reduce Possibility of Reoccurrence:	Replaced pump seal.
Total Oil Storage Capacity of Tank(s) or Impoundment(s) From Which Material Discharged:	()
Enforcement Actions:	Fire Department was notified
Effectiveness of Monitoring Equipment:	
Spill Detection:	
Brief Summary of the Impact of the Spill:	
Geographic Area:	

*Reportable spill, as defined in 40 CFR Part 110, is a discharge of oil that violates applicable water quality standards or a discharge into or upon the navigable waters of the United States or adjoining shorelines in harmful quantities.

FIGURE C-8 - REPORTABLE SPILL HISTORY*, CONTINUED

Information on reportable spills is documented in the Tr@ction reporting system. Copies of the Tr@ction Spill Reports are presented in **APPENDIX G**.

Date of Discharge(s):	02/24/2009
Location (Equipment or Operations):	Twin Seal Relief Valve
List of Discharge Causes:	Release of product from Twin Seal Relief Valve during normal operation.

Material(s) Discharged:	Diesel
Amount of Discharges in Gallons:	.25 (gallons)
Amount That Reached Navigable Waters (if applicable):	()
Effectiveness and Capacity of Secondary Containment:	
Cleanup Actions Taken:	0 gallons recovered
Steps Taken to Reduce Possibility of Reoccurrence:	Repaired twin seal relief valve.
Total Oil Storage Capacity of Tank(s) or Impoundment(s) From Which Material Discharged:	()
Enforcement Actions:	No regulatory authorities were notified
Effectiveness of Monitoring Equipment:	
Spill Detection:	
Brief Summary of the Impact of the Spill:	
Geographic Area:	

*Reportable spill, as defined in 40 CFR Part 110, is a discharge of oil that violates applicable water quality standards or a discharge into or upon the navigable waters of the United States or adjoining shorelines in harmful quantities.

FIGURE C-8 - REPORTABLE SPILL HISTORY*, CONTINUED

Information on reportable spills is documented in the Tr@ction reporting system. Copies of the Tr@ction Spill Reports are presented in **APPENDIX G**.

Date of Discharge(s):	02/24/2009
Location (Equipment or Operations):	Vacuum truck
List of Discharge Causes:	Release of product from hose connection on vacuum truck during normal operation
Material(s) Discharged:	Diesel
Amount of Discharges in Gallons:	.25 (gallon)
Amount That Reached Navigable Waters (if applicable):	()

Effectiveness and Capacity of Secondary Containment:	
Cleanup Actions Taken:	0 gallons recovered
Steps Taken to Reduce Possibility of Reoccurrence:	Discussed with driver.
Total Oil Storage Capacity of Tank(s) or Impoundment(s) From Which Material Discharged:	()
Enforcement Actions:	No regulatory authorities were notified
Effectiveness of Monitoring Equipment:	
Spill Detection:	
Brief Summary of the Impact of the Spill:	
Geographic Area:	

*Reportable spill, as defined in 40 CFR Part 110, is a discharge of oil that violates applicable water quality standards or a discharge into or upon the navigable waters of the United States or adjoining shorelines in harmful quantities.

FIGURE C-8 - REPORTABLE SPILL HISTORY*, CONTINUED

Information on reportable spills is documented in the Tr@ction reporting system. Copies of the Tr@ction Spill Reports are presented in **APPENDIX G**.

Date of Discharge(s):	12/26/2008
Location (Equipment or Operations):	Loading arm
List of Discharge Causes:	Driver disconnected loading arm with valve on trailer stuck in an open position during normal operation.
Material(s) Discharged:	Gasoline
Amount of Discharges in Gallons:	3 (gallons)
Amount That Reached Navigable Waters (if applicable):	()
Effectiveness and Capacity of Secondary Containment:	
Cleanup Actions Taken:	2 gallons recovered
Steps Taken to Reduce Possibility of Reoccurrence:	Discussed issue with driver.
Total Oil Storage Capacity of	

Tank(s) or Impoundment(s) From Which Material Discharged:	()
Enforcement Actions:	No regulatory authorities were notified
Effectiveness of Monitoring Equipment:	
Spill Detection:	
Brief Summary of the Impact of the Spill:	
Geographic Area:	

*Reportable spill, as defined in 40 CFR Part 110, is a discharge of oil that violates applicable water quality standards or a discharge into or upon the navigable waters of the United States or adjoining shorelines in harmful quantities.

FIGURE C-8 - REPORTABLE SPILL HISTORY*, CONTINUED

Information on reportable spills is documented in the Tr@ction reporting system. Copies of the Tr@ction Spill Reports are presented in **APPENDIX G**.

Date of Discharge(s):	11/25/2008
Location (Equipment or Operations):	pressure relief valve
List of Discharge Causes:	While loading a barge - distillate sprayed from a pressure relief valve during normal operation.
Material(s) Discharged:	Distillate
Amount of Discharges in Gallons:	425 (gallons)
Amount That Reached Navigable Waters (if applicable):	()
Effectiveness and Capacity of Secondary Containment:	
Cleanup Actions Taken:	400 gallons recovered
Steps Taken to Reduce Possibility of Reoccurrence:	Repaired pressure relief valve.
Total Oil Storage Capacity of Tank(s) or Impoundment(s) From Which Material Discharged:	()
Enforcement Actions:	Fire Department was notified
Effectiveness of Monitoring Equipment:	

Spill Detection:	
Brief Summary of the Impact of the Spill:	
Geographic Area:	

*Reportable spill, as defined in 40 CFR Part 110, is a discharge of oil that violates applicable water quality standards or a discharge into or upon the navigable waters of the United States or adjoining shorelines in harmful quantities.

FIGURE C-8 - REPORTABLE SPILL HISTORY*, CONTINUED

Information on reportable spills is documented in the Tr@ction reporting system. Copies of the Tr@ction Spill Reports are presented in **APPENDIX G**.

Date of Discharge(s):	02/29/2008
Location (Equipment or Operations):	Flange connection
List of Discharge Causes:	A flange connection dripping gasoline during normal operation
Material(s) Discharged:	Gasoline
Amount of Discharges in Gallons:	1 (gallon)
Amount That Reached Navigable Waters (if applicable):	()
Effectiveness and Capacity of Secondary Containment:	
Cleanup Actions Taken:	0 gallons recovered
Steps Taken to Reduce Possibility of Reoccurrence:	Repaired flange connection.
Total Oil Storage Capacity of Tank(s) or Impoundment(s) From Which Material Discharged:	()
Enforcement Actions:	No regulatory authorities were notified
Effectiveness of Monitoring Equipment:	
Spill Detection:	
Brief Summary of the Impact of the Spill:	
Geographic Area:	

*Reportable spill, as defined in 40 CFR Part 110, is a discharge of oil that violates applicable water quality standards or a discharge into or upon the navigable waters of the United States or

adjoining shorelines in harmful quantities.

FIGURE C-8 - REPORTABLE SPILL HISTORY*, CONTINUED

Information on reportable spills is documented in the Tr@ction reporting system. Copies of the Tr@ction Spill Reports are presented in **APPENDIX G**.

Date of Discharge(s):	03/18/2007
Location (Equipment or Operations):	Denatured Ethanol Rack Pump Leaking
List of Discharge Causes:	Denatured Ethanol Rack Pump Leaking during normal operation
Material(s) Discharged:	Denatured Ethanol
Amount of Discharges in Gallons:	2 (gallons)
Amount That Reached Navigable Waters (if applicable):	()
Effectiveness and Capacity of Secondary Containment:	
Cleanup Actions Taken:	0 gallons recovered
Steps Taken to Reduce Possibility of Reoccurrence:	Repaired pump
Total Oil Storage Capacity of Tank(s) or Impoundment(s) From Which Material Discharged:	()
Enforcement Actions:	No regulatory authorities were notified
Effectiveness of Monitoring Equipment:	
Spill Detection:	
Brief Summary of the Impact of the Spill:	
Geographic Area:	

*Reportable spill, as defined in 40 CFR Part 110, is a discharge of oil that violates applicable water quality standards or a discharge into or upon the navigable waters of the United States or adjoining shorelines in harmful quantities.

FIGURE C-8 - REPORTABLE SPILL HISTORY*, CONTINUED

Information on reportable spills is documented in the Tr@ction reporting system. Copies of the Tr@ction Spill Reports are presented in **APPENDIX G**.

Date of Discharge(s):	03/06/2007
Location (Equipment or Operations):	Truck rack
List of Discharge Causes:	During normal operations, truck overfill at truck rack of 35 gallons due to a malfunction in a solenoid valve not closing.
Material(s) Discharged:	Gasoline
Amount of Discharges in Gallons:	35 (gallons)
Amount That Reached Navigable Waters (if applicable):	()
Effectiveness and Capacity of Secondary Containment:	
Cleanup Actions Taken:	35 gallons recovered
Steps Taken to Reduce Possibility of Reoccurrence:	Replaced solenoid valve.
Total Oil Storage Capacity of Tank(s) or Impoundment(s) From Which Material Discharged:	()
Enforcement Actions:	No regulatory authorities were notified
Effectiveness of Monitoring Equipment:	
Spill Detection:	
Brief Summary of the Impact of the Spill:	
Geographic Area:	

*Reportable spill, as defined in 40 CFR Part 110, is a discharge of oil that violates applicable water quality standards or a discharge into or upon the navigable waters of the United States or adjoining shorelines in harmful quantities.

FIGURE C-8 - REPORTABLE SPILL HISTORY*, CONTINUED

Information on reportable spills is documented in the Tr@ction reporting system. Copies of the Tr@ction Spill Reports are presented in **APPENDIX G**.

Date of Discharge(s):	08/01/2006
Location (Equipment or Operations):	Buckeye pump
List of Discharge Causes:	During normal operation, leak at Buckeye pump

Material(s) Discharged:	Distillate
Amount of Discharges in Gallons:	10 (gallons)
Amount That Reached Navigable Waters (if applicable):	()
Effectiveness and Capacity of Secondary Containment:	
Cleanup Actions Taken:	5 gallons recovered
Steps Taken to Reduce Possibility of Reoccurrence:	Buckeye repaired the pump.
Total Oil Storage Capacity of Tank(s) or Impoundment(s) From Which Material Discharged:	()
Enforcement Actions:	State, Fire Department, NJDEP were notified
Effectiveness of Monitoring Equipment:	
Spill Detection:	
Brief Summary of the Impact of the Spill:	
Geographic Area:	

*Reportable spill, as defined in 40 CFR Part 110, is a discharge of oil that violates applicable water quality standards or a discharge into or upon the navigable waters of the United States or adjoining shorelines in harmful quantities.

FIGURE C-8 - REPORTABLE SPILL HISTORY*, CONTINUED

Information on reportable spills is documented in the Tr@ction reporting system. Copies of the Tr@ction Spill Reports are presented in **APPENDIX G**.

Date of Discharge(s):	05/15/2006
Location (Equipment or Operations):	Buckeye Pump Section
List of Discharge Causes:	During normal operation, product leak from Buckeye Pump Section
Material(s) Discharged:	Distillate
Amount of Discharges in Gallons:	1450 (gallons)
Amount That Reached Navigable Waters (if applicable):	()

Effectiveness and Capacity of Secondary Containment:	
Cleanup Actions Taken:	1450 gallons recovered
Steps Taken to Reduce Possibility of Reoccurrence:	Replaced al similar unions in the Buckeye area and inspect terminal for similar unions with a 30 day period and catalog and report back to terminal mgmt with plan to replace them.
Total Oil Storage Capacity of Tank(s) or Impoundment(s) From Which Material Discharged:	()
Enforcement Actions:	State, City, DOT, NRC, NJDEP were notified
Effectiveness of Monitoring Equipment:	
Spill Detection:	
Brief Summary of the Impact of the Spill:	
Geographic Area:	

*Reportable spill, as defined in 40 CFR Part 110, is a discharge of oil that violates applicable water quality standards or a discharge into or upon the navigable waters of the United States or adjoining shorelines in harmful quantities.

FIGURE C-8 - REPORTABLE SPILL HISTORY*, CONTINUED

Information on reportable spills is documented in the Tr@ction reporting system. Copies of the Tr@ction Spill Reports are presented in **APPENDIX G**.

Date of Discharge(s):	11/15/2005
Location (Equipment or Operations):	Rack
List of Discharge Causes:	During normal operation, tanker truck overfill at rack [redacted] (b)(7)(F)
Material(s) Discharged:	Gasoline
Amount of Discharges in Gallons:	5 (gallons)
Amount That Reached Navigable Waters (if applicable):	()
Effectiveness and Capacity of Secondary Containment:	
Cleanup Actions Taken:	5 gallons recovered
Steps Taken to Reduce Possibility of Reoccurrence:	Defective equipment. Changed out.

Total Oil Storage Capacity of Tank(s) or Impoundment(s) From Which Material Discharged:	()
Enforcement Actions:	State NJDEP was notified
Effectiveness of Monitoring Equipment:	
Spill Detection:	
Brief Summary of the Impact of the Spill:	
Geographic Area:	

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FIGURE C-8 - REPORTABLE SPILL HISTORY*, CONTINUED

Information on reportable spills is documented in the Tr@ction reporting system. Copies of the Tr@ction Spill Reports are presented in **APPENDIX G**.

Date of Discharge(s):	03/02/2005
Location (Equipment or Operations):	Tank 23 dike area
List of Discharge Causes:	During normal operation, product spill from PRV in Tank 23 dike area.
Material(s) Discharged:	Gasoline
Amount of Discharges in Gallons:	500 (gallons)
Amount That Reached Navigable Waters (if applicable):	()
Effectiveness and Capacity of Secondary Containment:	Product spilled into Tank 23 dike area
Cleanup Actions Taken:	400 gallons recovered
Steps Taken to Reduce Possibility of Reoccurrence:	Repaired PRV piping.
Total Oil Storage Capacity of Tank(s) or Impoundment(s) From Which Material Discharged:	()
Enforcement Actions:	EPA, State, Fire Department, NRC, NJDEP were notified
Effectiveness of Monitoring	

Equipment:	
Spill Detection:	
Brief Summary of the Impact of the Spill:	
Geographic Area:	

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FIGURE C-8 - REPORTABLE SPILL HISTORY*, CONTINUED

Information on reportable spills is documented in the Tr@ction reporting system. Copies of the Tr@ction Spill Reports are presented in **APPENDIX G**.

Date of Discharge(s):	05/09/2004
Location (Equipment or Operations):	Tank 25
List of Discharge Causes:	During normal operation, denatured ethanol flange leak on Tank 25
Material(s) Discharged:	Denatured ethanol
Amount of Discharges in Gallons:	5,877 (gallons)
Amount That Reached Navigable Waters (if applicable):	()
Effectiveness and Capacity of Secondary Containment:	
Cleanup Actions Taken:	1,000 gallons recovered
Steps Taken to Reduce Possibility of Reoccurrence:	Develop monitoring procedures for contractor construction activities.
Total Oil Storage Capacity of Tank(s) or Impoundment(s) From Which Material Discharged:	()
Enforcement Actions:	EPA, State, Fire Department, NRC, NJDEP were notified
Effectiveness of Monitoring Equipment:	
Spill Detection:	
Brief Summary of the Impact of the Spill:	
Geographic Area:	

*Reportable spill, as defined in 40 CFR Part 110, is a discharge of oil that violates applicable water quality standards or a discharge into or upon the navigable waters of the United States or adjoining shorelines in harmful quantities.

FIGURE C-8 - REPORTABLE SPILL HISTORY*, CONTINUED

Information on reportable spills is documented in the Tr@ction reporting system. Copies of the Tr@ction Spill Reports are presented in **APPENDIX G**.

Date of Discharge(s):	03/30/2004
Location (Equipment or Operations):	premium line to the rack
List of Discharge Causes:	During pipeline relief line release, leak from pressure relief elbow on the premium line to the rack.
Material(s) Discharged:	Gasoline
Amount of Discharges in Gallons:	3 (gallons)
Amount That Reached Navigable Waters (if applicable):	()
Effectiveness and Capacity of Secondary Containment:	
Cleanup Actions Taken:	3 gallons recovered
Steps Taken to Reduce Possibility of Reoccurrence:	Increased maintenance/repair.
Total Oil Storage Capacity of Tank(s) or Impoundment(s) From Which Material Discharged:	()
Enforcement Actions:	State and EPA were notified
Effectiveness of Monitoring Equipment:	
Spill Detection:	
Brief Summary of the Impact of the Spill:	
Geographic Area:	

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FIGURE C-8 - REPORTABLE SPILL HISTORY*, CONTINUED

Information on reportable spills is documented in the Tr@ction reporting system. Copies of the Tr@ction Spill Reports are presented in **APPENDIX G**.

Date of Discharge(s):	03/24/2004
Location (Equipment or Operations):	BP property
List of Discharge Causes:	During pipeline valve release, product release by Colonial Pipeline valve on BP property.
Material(s) Discharged:	Distillate
Amount of Discharges in Gallons:	10 (gallons)
Amount That Reached Navigable Waters (if applicable):	()
Effectiveness and Capacity of Secondary Containment:	
Cleanup Actions Taken:	0 gallons recovered
Steps Taken to Reduce Possibility of Reoccurrence:	Increased maintenance/repair.
Total Oil Storage Capacity of Tank(s) or Impoundment(s) From Which Material Discharged:	()
Enforcement Actions:	State, NJDEP were notified
Effectiveness of Monitoring Equipment:	
Spill Detection:	
Brief Summary of the Impact of the Spill:	
Geographic Area:	

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FIGURE C-8 - REPORTABLE SPILL HISTORY*, CONTINUED

Information on reportable spills is documented in the Tr@ction reporting system. Copies of the Tr@ction Spill Reports are presented in **APPENDIX G**.

Date of Discharge(s):	02/10/2004
Location (Equipment or Operations):	Baker Tank

List of Discharge Causes:	During tank cleaning, sludge spilled from Baker Tank. The manway on the west side of the Baker Tank was not completely fastened.
Material(s) Discharged:	Sludge (distillate)
Amount of Discharges in Gallons:	44 (gallons)
Amount That Reached Navigable Waters (if applicable):	()
Effectiveness and Capacity of Secondary Containment:	
Cleanup Actions Taken:	44 gallons were recovered
Steps Taken to Reduce Possibility of Reoccurrence:	Increased awareness of routine activity.
Total Oil Storage Capacity of Tank(s) or Impoundment(s) From Which Material Discharged:	()
Enforcement Actions:	State was notified
Effectiveness of Monitoring Equipment:	
Spill Detection:	
Brief Summary of the Impact of the Spill:	
Geographic Area:	

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FIGURE C-8 - REPORTABLE SPILL HISTORY*, CONTINUED

Information on reportable spills is documented in the Tr@ction reporting system. Copies of the Tr@ction Spill Reports are presented in **APPENDIX G**.

Date of Discharge(s):	12/10/2003
Location (Equipment or Operations):	flange in Buckeye Area
List of Discharge Causes:	During construction, leak from flange in Buckeye Area
Material(s) Discharged:	Gasoline
Amount of Discharges in Gallons:	500 (gallons)
Amount That Reached	

Navigable Waters (if applicable):	()
Effectiveness and Capacity of Secondary Containment:	
Cleanup Actions Taken:	300 gallons were recovered
Steps Taken to Reduce Possibility of Reoccurrence:	Increased awareness of routine activity.
Total Oil Storage Capacity of Tank(s) or Impoundment(s) From Which Material Discharged:	()
Enforcement Actions:	EPA, Coast Guard, State, Fire Department, NRC were notified
Effectiveness of Monitoring Equipment:	
Spill Detection:	
Brief Summary of the Impact of the Spill:	
Geographic Area:	

*Reportable spill, as defined in 40 CFR Part 110, is a discharge of oil that violates applicable water quality standards or a discharge into or upon the navigable waters of the United States or adjoining shorelines in harmful quantities.

FIGURE C-8 - REPORTABLE SPILL HISTORY*, CONTINUED

Information on reportable spills is documented in the Tr@ction reporting system. Copies of the Tr@ction Spill Reports are presented in **APPENDIX G**.

Date of Discharge(s):	06/30/2003
Location (Equipment or Operations):	Dock cell #6
List of Discharge Causes:	Dock cell #6 release of water with visible sheen
Material(s) Discharged:	Distillate
Amount of Discharges in Gallons:	0.5 (gallon)
Amount That Reached Navigable Waters (if applicable):	()
Effectiveness and Capacity of Secondary Containment:	
Cleanup Actions Taken:	0.5 gallon was recovered
Steps Taken to Reduce	Increased awareness of routine activity.

Possibility of Reoccurrence:	
Total Oil Storage Capacity of Tank(s) or Impoundment(s) From Which Material Discharged:	()
Enforcement Actions:	EPA, Coast Guard, State, Fire Department, NJDEP, NRC were notified
Effectiveness of Monitoring Equipment:	
Spill Detection:	
Brief Summary of the Impact of the Spill:	
Geographic Area:	

*Reportable spill, as defined in 40 CFR Part 110, is a discharge of oil that violates applicable water quality standards or a discharge into or upon the navigable waters of the United States or adjoining shorelines in harmful quantities.

FIGURE C-8 - REPORTABLE SPILL HISTORY*, CONTINUED

Information on reportable spills is documented in the Tr@ction reporting system. Copies of the Tr@ction Spill Reports are presented in **APPENDIX G**.

Date of Discharge(s):	03/05/2003
Location (Equipment or Operations):	Buckeye manifold
List of Discharge Causes:	During material handling, LS fuel oil release - Buckeye manifold.
Material(s) Discharged:	LS fuel oil (distillate)
Amount of Discharges in Gallons:	35 (gallons)
Amount That Reached Navigable Waters (if applicable):	()
Effectiveness and Capacity of Secondary Containment:	
Cleanup Actions Taken:	30 gallons were recovered
Steps Taken to Reduce Possibility of Reoccurrence:	Communicate that bolts on block valve/flange loosen up with cold weather pressure.
Total Oil Storage Capacity of Tank(s) or Impoundment(s) From Which Material Discharged:	()
	EPA, City, State, Fire Department, DOT, NRC were

Enforcement Actions:	notified
Effectiveness of Monitoring Equipment:	
Spill Detection:	
Brief Summary of the Impact of the Spill:	
Geographic Area:	

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FIGURE C-8 - REPORTABLE SPILL HISTORY*, CONTINUED

Information on reportable spills is documented in the Tr@ction reporting system. Copies of the Tr@ction Spill Reports are presented in **APPENDIX G**.

Date of Discharge(s):	12/16/2002
Location (Equipment or Operations):	
List of Discharge Causes:	During filling of third party product recovery tank, product recovey tank overflowed into dike area.
Material(s) Discharged:	Condensate
Amount of Discharges in Gallons:	35 (gallons)
Amount That Reached Navigable Waters (if applicable):	()
Effectiveness and Capacity of Secondary Containment:	overflow into dike area
Cleanup Actions Taken:	35 gallons were recovered.
Steps Taken to Reduce Possibility of Reoccurrence:	Servicing of equipment in operation. Increase communication between work groups.
Total Oil Storage Capacity of Tank(s) or Impoundment(s) From Which Material Discharged:	()
Enforcement Actions:	EPA, State, Fire Department, NRC were notified
Effectiveness of Monitoring Equipment:	
Spill Detection:	
Brief Summary of the Impact of the Spill:	

Geographic Area:	

*Reportable spill, as defined in 40 CFR Part 110, is a discharge of oil that violates applicable water quality standards or a discharge into or upon the navigable waters of the United States or adjoining shorelines in harmful quantities.

FIGURE C-8 - REPORTABLE SPILL HISTORY*, CONTINUED

Information on reportable spills is documented in the Tr@ction reporting system. Copies of the Tr@ction Spill Reports are presented in **APPENDIX G**.

Date of Discharge(s):	11/09/2002
Location (Equipment or Operations):	Dock loading cell
List of Discharge Causes:	During discharging of products, LS#2 leaked onto dock loading cell from drip pan. Drip pan overflowed because pump back system valves were left in the open position and check valve may have failed.
Material(s) Discharged:	LS#2 (Distillate)
Amount of Discharges in Gallons:	1,000 (gallons)
Amount That Reached Navigable Waters (if applicable):	()
Effectiveness and Capacity of Secondary Containment:	Product leaked onto dock loading cell from drip pan and drip pan overflowed
Cleanup Actions Taken:	1,000 gallons recovered.
Steps Taken to Reduce Possibility of Reoccurrence:	Tested equipment.
Total Oil Storage Capacity of Tank(s) or Impoundment(s) From Which Material Discharged:	()
Enforcement Actions:	EPA, Coast Guard, Fire Department, NRC were notified
Effectiveness of Monitoring Equipment:	
Spill Detection:	
Brief Summary of the Impact of the Spill:	
Geographic Area:	

*Reportable spill, as defined in 40 CFR Part 110, is a discharge of oil that violates applicable water quality standards or a discharge into or upon the navigable waters of the United States or adjoining shorelines in harmful quantities.

FIGURE C-8 - REPORTABLE SPILL HISTORY*, CONTINUED

Information on reportable spills is documented in the Tr@ction reporting system. Copies of the Tr@ction Spill Reports are presented in **APPENDIX G**.

Date of Discharge(s):	06/18/2002
Location (Equipment or Operations):	Rack loading spot
List of Discharge Causes:	During product loading, gasoline was discharged into Truck Vapor lines and ended up in rack drainage system.
Material(s) Discharged:	Gasoline
Amount of Discharges in Gallons:	85 (gallons)
Amount That Reached Navigable Waters (if applicable):	()
Effectiveness and Capacity of Secondary Containment:	Product ended up in rack drainage system
Cleanup Actions Taken:	65 gallons recovered
Steps Taken to Reduce Possibility of Reoccurrence:	Rack loading spot was tested and found to have no defects.
Total Oil Storage Capacity of Tank(s) or Impoundment(s) From Which Material Discharged:	()
Enforcement Actions:	EPA, City, State, Fire Department, NRC were notified
Effectiveness of Monitoring Equipment:	ruck compartment sensor did not trip rack high level shut down
Spill Detection:	
Brief Summary of the Impact of the Spill:	
Geographic Area:	

*Reportable spill, as defined in 40 CFR Part 110, is a discharge of oil that violates applicable water quality standards or a discharge into or upon the navigable waters of the United States or adjoining shorelines in harmful quantities.

FIGURE C-8 - REPORTABLE SPILL HISTORY*, CONTINUED

Information on reportable spills is documented in the Tr@ction reporting system. Copies of the Tr@ction Spill Reports are presented in **APPENDIX G**.

Date of Discharge(s):	06/15/2002
Location (Equipment or Operations):	red dye pump
List of Discharge Causes:	During normal operation, pressure relief valve on discharge side of red dye pump burst and released red dye onto pad and into dike area.
Material(s) Discharged:	red dye additive
Amount of Discharges in Gallons:	35 (gallons)
Amount That Reached Navigable Waters (if applicable):	()
Effectiveness and Capacity of Secondary Containment:	Released red dye onto pad and into dike area.
Cleanup Actions Taken:	25 gallons were recovered.
Steps Taken to Reduce Possibility of Reoccurrence:	Checked pressure relief valve.
Total Oil Storage Capacity of Tank(s) or Impoundment(s) From Which Material Discharged:	()
Enforcement Actions:	EPA, Coast Guard, City, State, Fire Department, NRC were notified.
Effectiveness of Monitoring Equipment:	
Spill Detection:	
Brief Summary of the Impact of the Spill:	
Geographic Area:	

*Reportable spill, as defined in 40 CFR Part 110, is a discharge of oil that violates applicable water quality standards or a discharge into or upon the navigable waters of the United States or adjoining shorelines in harmful quantities.

FIGURE C-8 - REPORTABLE SPILL HISTORY*, CONTINUED

Information on reportable spills is documented in the Tr@ction reporting system. Copies of the Tr@ction Spill Reports are presented in **APPENDIX G**.

Date of Discharge(s):	04/08/2002
Location (Equipment or Operations):	dock facility
	Product spill during discharging of products. An 8"

List of Discharge Causes:	flange gasket failed while loading a barge at dock facility.
Material(s) Discharged:	Distillate
Amount of Discharges in Gallons:	20 (gallons)
Amount That Reached Navigable Waters (if applicable):	()
Effectiveness and Capacity of Secondary Containment:	
Cleanup Actions Taken:	20 gallons were recovered.
Steps Taken to Reduce Possibility of Reoccurrence:	Checked all gaskets for wear on all cells.
Total Oil Storage Capacity of Tank(s) or Impoundment(s) From Which Material Discharged:	()
Enforcement Actions:	Coast Guard and FD were notified.
Effectiveness of Monitoring Equipment:	
Spill Detection:	
Brief Summary of the Impact of the Spill:	
Geographic Area:	

*Reportable spill, as defined in 40 CFR Part 110, is a discharge of oil that violates applicable water quality standards or a discharge into or upon the navigable waters of the United States or adjoining shorelines in harmful quantities.

FIGURE C-8 - REPORTABLE SPILL HISTORY*, CONTINUED

Information on reportable spills is documented in the Tr@ction reporting system. Copies of the Tr@ction Spill Reports are presented in **APPENDIX G**.

Date of Discharge(s):	01/26/2002
Location (Equipment or Operations):	Marine VRU unit
List of Discharge Causes:	A gasket failed on the marine VRU unit during product loading.
Material(s) Discharged:	Gasoline
Amount of Discharges in Gallons:	20 (gallons)
Amount That Reached	

Navigable Waters (if applicable):	()
Effectiveness and Capacity of Secondary Containment:	0 gallons were recovered
Cleanup Actions Taken:	Loading operation was stopped. Supply line was closed. A new gasket was installed and area cleaned up, soil removed.
Steps Taken to Reduce Possibility of Reoccurrence:	
Total Oil Storage Capacity of Tank(s) or Impoundment(s) From Which Material Discharged:	()
Enforcement Actions:	Coast Guard and FD were notified.
Effectiveness of Monitoring Equipment:	
Spill Detection:	
Brief Summary of the Impact of the Spill:	
Geographic Area:	

*Reportable spill, as defined in 40 CFR Part 110, is a discharge of oil that violates applicable water quality standards or a discharge into or upon the navigable waters of the United States or adjoining shorelines in harmful quantities.

FIGURE C-8 - REPORTABLE SPILL HISTORY*, CONTINUED

Information on reportable spills is documented in the Tr@ction reporting system. Copies of the Tr@ction Spill Reports are presented in **APPENDIX G**.

Date of Discharge(s):	12/31/2001
Location (Equipment or Operations):	In the north cell of the BP dock
List of Discharge Causes:	The incident occurred while disconnecting the cargo hose. The hose kicked back and released premium gasoline.
Material(s) Discharged:	premium gasoline
Amount of Discharges in Gallons:	0.5 (gallon)
Amount That Reached Navigable Waters (if applicable):	0.5 (gallon)
Effectiveness and Capacity of Secondary Containment:	Spilled into the Arthur Kill and was evaporated

Cleanup Actions Taken:	Spilled into the Arthur Kill and was evaporated
Steps Taken to Reduce Possibility of Reoccurrence:	Pushing the hose back over the slop tank and turning the flange on.
Total Oil Storage Capacity of Tank(s) or Impoundment(s) From Which Material Discharged:	()
Enforcement Actions:	The Coast Guard, NSA, and NJDEP were notified. Case number 589853 for NSA and 01-12-31-1706-26 for DEP were assigned.
Effectiveness of Monitoring Equipment:	
Spill Detection:	
Brief Summary of the Impact of the Spill:	
Geographic Area:	

*Reportable spill, as defined in 40 CFR Part 110, is a discharge of oil that violates applicable water quality standards or a discharge into or upon the navigable waters of the United States or adjoining shorelines in harmful quantities.

FIGURE C-8 - REPORTABLE SPILL HISTORY*, CONTINUED

Information on reportable spills is documented in the Tr@ction reporting system. Copies of the Tr@ction Spill Reports are presented in **APPENDIX G**.

Date of Discharge(s):	12/14/2001
Location (Equipment or Operations):	In the area near the loading dock
List of Discharge Causes:	Equipment failure during loading
Material(s) Discharged:	fuel oil
Amount of Discharges in Gallons:	0.5 (gallon)
Amount That Reached Navigable Waters (if applicable):	0.5 (gallon)
Effectiveness and Capacity of Secondary Containment:	Spill into the Arthur Kill
Cleanup Actions Taken:	Immediate actions were taken to contain and clean up the spill by terminal employees and Atlantic Response. The entire volume of the spill was recovered.
Steps Taken to Reduce Possibility of Reoccurrence:	Immediately cleaning up the spill. Resetting the fitting and seal on the 2-inch hose and replacing the hose.
Total Oil Storage Capacity of	

Tank(s) or Impoundment(s) From Which Material Discharged:	()
Enforcement Actions:	The Coast Guard and NJDEP were notified and case number 01-12-14-1348-28 was assigned.
Effectiveness of Monitoring Equipment:	
Spill Detection:	
Brief Summary of the Impact of the Spill:	
Geographic Area:	

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FIGURE C-8 - REPORTABLE SPILL HISTORY*, CONTINUED

Information on reportable spills is documented in the Tr@ction reporting system. Copies of the Tr@ction Spill Reports are presented in **APPENDIX G**.

Date of Discharge(s):	02/07/2001
Location (Equipment or Operations):	In the area near tanks 27 and 28
List of Discharge Causes:	An outside inspector failed to open the proper dye hopper valve during inspection
Material(s) Discharged:	fuel oil and red dye
Amount of Discharges in Gallons:	25 (gallons)
Amount That Reached Navigable Waters (if applicable):	()
Effectiveness and Capacity of Secondary Containment:	Spill into a secondary containment area by the pump manifold
Cleanup Actions Taken:	Immediate actions were taken to contain and clean up the spill by terminal employees.
Steps Taken to Reduce Possibility of Reoccurrence:	Immediately opening the correct valve and closing the incorrect valve. Requiring the inspector who caused the incident to be retrained. Implementing procedures to require all inspectors to be trained prior to using the dye hopper system.
Total Oil Storage Capacity of Tank(s) or Impoundment(s) From Which Material Discharged:	()

Enforcement Actions:	Notification of the NJDEP and the Carteret fire and police departments was made. Case number 01-02-07-1906-58 was assigned.
Effectiveness of Monitoring Equipment:	
Spill Detection:	
Brief Summary of the Impact of the Spill:	
Geographic Area:	

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FIGURE C-8 - REPORTABLE SPILL HISTORY*, CONTINUED

Information on reportable spills is documented in the Tr@ction reporting system. Copies of the Tr@ction Spill Reports are presented in **APPENDIX G**.

Date of Discharge(s):	12/06/2000
Location (Equipment or Operations):	Loading rack area
List of Discharge Causes:	The incident occurred when a driver used the incorrect pipe sleeve during fueling. It was also determined that the check valve failed at this time.
Material(s) Discharged:	fuel oil
Amount of Discharges in Gallons:	758 (gallons)
Amount That Reached Navigable Waters (if applicable):	()
Effectiveness and Capacity of Secondary Containment:	Spilled onto the loading rack floor
Cleanup Actions Taken:	Immediate actions were taken to contain and clean up the spill by terminal employees, and the entire quantity was contained and recovered from the loading rack floor.
Steps Taken to Reduce Possibility of Reoccurrence:	Immediately repairing the valve. Implementing procedures to require all drivers to be trained and recertified with a refresher course.
Total Oil Storage Capacity of Tank(s) or Impoundment(s) From Which Material Discharged:	()
Enforcement Actions:	Notification of the NJDEP and the Carteret fire and police departments was made.

Effectiveness of Monitoring Equipment:	
Spill Detection:	
Brief Summary of the Impact of the Spill:	
Geographic Area:	

*Reportable spill, as defined in 40 CFR Part 110, is a discharge of oil that violates applicable water quality standards or a discharge into or upon the navigable waters of the United States or adjoining shorelines in harmful quantities.

FIGURE C-8 - REPORTABLE SPILL HISTORY*, CONTINUED

Information on reportable spills is documented in the Tr@ction reporting system. Copies of the Tr@ction Spill Reports are presented in **APPENDIX G**.

Date of Discharge(s):	08/28/2000
Location (Equipment or Operations):	Pump manifold near Tanks 27 and 28
List of Discharge Causes:	A flange loosened and leaked
Material(s) Discharged:	fuel oil
Amount of Discharges in Gallons:	1 (gallon)
Amount That Reached Navigable Waters (if applicable):	()
Effectiveness and Capacity of Secondary Containment:	
Cleanup Actions Taken:	Immediate actions were taken to contain and clean up the spill by terminal Environmental Response.
Steps Taken to Reduce Possibility of Reoccurrence:	Immediately tightening the flange. Implementing procedures to periodically check flanges.
Total Oil Storage Capacity of Tank(s) or Impoundment(s) From Which Material Discharged:	()
Enforcement Actions:	Notification of the NJDEP, the Carteret fire and police departments, and the U.S. Coast Guard was made.
Effectiveness of Monitoring Equipment:	
Spill Detection:	
Brief Summary of the Impact of the Spill:	

Geographic Area:	

*Reportable spill, as defined in 40 CFR Part 110, is a discharge of oil that violates applicable water quality standards or a discharge into or upon the navigable waters of the United States or adjoining shorelines in harmful quantities.

FIGURE C-8 - REPORTABLE SPILL HISTORY*, CONTINUED

Information on reportable spills is documented in the Tr@ction reporting system. Copies of the Tr@ction Spill Reports are presented in **APPENDIX G**.

Date of Discharge(s):	06/12/2000
Location (Equipment or Operations):	Tank 95
List of Discharge Causes:	The odor was due to floor failure of tank 95
Material(s) Discharged:	gasoline
Amount of Discharges in Gallons:	35,000 (gallons)
Amount That Reached Navigable Waters (if applicable):	()
Effectiveness and Capacity of Secondary Containment:	30,000 gallons of the spill was recovered immediately, and additional amounts were recovered during soil removal and treatment.
Cleanup Actions Taken:	Immediate actions were taken to contain and clean up the spill by terminal employees with additional help that was called in.
Steps Taken to Reduce Possibility of Reoccurrence:	Immediately repairing the tank floor with patching. Continuation of internal tank inspections as per schedule.
Total Oil Storage Capacity of Tank(s) or Impoundment(s) From Which Material Discharged:	()
Enforcement Actions:	Notification of the NJDEP, the Carteret fire and police departments, and the U.S. Coast Guard was made.
Effectiveness of Monitoring Equipment:	
Spill Detection:	An operator smelled gas during a typical tour of the yard.
Brief Summary of the Impact of the Spill:	
Geographic Area:	

*Reportable spill, as defined in 40 CFR Part 110, is a discharge of oil that violates applicable

water quality standards or a discharge into or upon the navigable waters of the United States or adjoining shorelines in harmful quantities.

FIGURE C-8 - REPORTABLE SPILL HISTORY*, CONTINUED

Information on reportable spills is documented in the Tr@ction reporting system. Copies of the Tr@ction Spill Reports are presented in **APPENDIX G**.

Date of Discharge(s):	02/05/2000
Location (Equipment or Operations):	Near Tanks 27 and 28
List of Discharge Causes:	A drain plug fell out of a pump for reasons unknown
Material(s) Discharged:	fuel oil and red dye
Amount of Discharges in Gallons:	3,500 (gallons)
Amount That Reached Navigable Waters (if applicable):	()
Effectiveness and Capacity of Secondary Containment:	The spill was contained on the ground.
Cleanup Actions Taken:	3000 gallons were recovered. This was followed by soil remediation conducted by the Environmental Spill Response Team. Immediate actions were taken to contain and clean up the spill by terminal employees with additional help that was called in.
Steps Taken to Reduce Possibility of Reoccurrence:	Implementing a procedure of monthly checks of all drain plugs on pumps at the terminal.
Total Oil Storage Capacity of Tank(s) or Impoundment(s) From Which Material Discharged:	()
Enforcement Actions:	Notification of the NJDEP and the Carteret fire and police departments was made.
Effectiveness of Monitoring Equipment:	
Spill Detection:	
Brief Summary of the Impact of the Spill:	
Geographic Area:	

*Reportable spill, as defined in 40 CFR Part 110, is a discharge of oil that violates applicable water quality standards or a discharge into or upon the navigable waters of the United States or adjoining shorelines in harmful quantities.

FIGURE C-8 - REPORTABLE SPILL HISTORY*, CONTINUED

Information on reportable spills is documented in the Tr@ction reporting system. Copies of the Tr@ction Spill Reports are presented in **APPENDIX G**.

Date of Discharge(s):	3/28/1997
Location (Equipment or Operations):	
List of Discharge Causes:	Defective Flange Gasket at Buckeye Pipeline near Terminal Tank # 71
Material(s) Discharged:	Gasoline
Amount of Discharges in Gallons:	1,900 (gals)
Amount That Reached Navigable Waters (if applicable):	0 (gals)
Effectiveness and Capacity of Secondary Containment:	Unknown
Cleanup Actions Taken:	Terminal Employees deployed sorbents booms and pads to recover product. Reported to NJDEP # 97-03-28-1135-24
Steps Taken to Reduce Possibility of Reoccurrence:	Pipeline taken out of service. Gasket replaced, line pressure tested before returning to service.
Total Oil Storage Capacity of Tank(s) or Impoundment(s) From Which Material Discharged:	N/A ()
Enforcement Actions:	N/A
Effectiveness of Monitoring Equipment:	N/A
Spill Detection:	Visual by the Operator
Brief Summary of the Impact of the Spill:	N/A
Geographic Area:	N/A

*Reportable spill, as defined in 40 CFR Part 110, is a discharge of oil that violates applicable water quality standards or a discharge into or upon the navigable waters of the United States or adjoining shorelines in harmful quantities.

FIGURE C-8 - REPORTABLE SPILL HISTORY*, CONTINUED

Information on reportable spills is documented in the Tr@ction reporting system. Copies of the Tr@ction Spill Reports are presented in **APPENDIX G**.

Date of Discharge(s):	11/29/1995
Location (Equipment or Operations):	
List of Discharge Causes:	Relief valve at Vapor Recovery Unit Relief valve in a vapor line
Material(s) Discharged:	Gasoline
Amount of Discharges in Gallons:	Less than 2 (gals)
Amount That Reached Navigable Waters (if applicable):	0 (gals)
Effectiveness and Capacity of Secondary Containment:	In Containment Area all concrete
Cleanup Actions Taken:	Recovered with sorbent pads
Steps Taken to Reduce Possibility of Reoccurrence:	A high pressure interlock was installed to stop transfer operations prior to reaching relief valve set pressure
Total Oil Storage Capacity of Tank(s) or Impoundment(s) From Which Material Discharged:	N/A ()
Enforcement Actions:	None
Effectiveness of Monitoring Equipment:	N/A
Spill Detection:	Visual by the Operator
Brief Summary of the Impact of the Spill:	N/A
Geographic Area:	N/A

*Reportable spill, as defined in 40 CFR Part 110, is a discharge of oil that violates applicable water quality standards or a discharge into or upon the navigable waters of the United States or adjoining shorelines in harmful quantities.

FIGURE C-8 - REPORTABLE SPILL HISTORY*, CONTINUED

Information on reportable spills is documented in the Tr@ction reporting system. Copies of the Tr@ction Spill Reports are presented in **APPENDIX G**.

Date of Discharge(s):	5/3/1995
Location (Equipment or Operations):	
List of Discharge Causes:	Pail containing fuel oil that had been drain from pipeline was knocked over into drainage ditch which leads to Rum Creek. Remote location near pipeline replacement project.

Material(s) Discharged:	Diesel
Amount of Discharges in Gallons:	2.5 (gals)
Amount That Reached Navigable Waters (if applicable):	0 (gals)
Effectiveness and Capacity of Secondary Containment:	N/A
Cleanup Actions Taken:	Terminal personnel recovered product with pads and excavation equipment
Steps Taken to Reduce Possibility of Reoccurrence:	Procedures used to drain pipelines were reviewed, to assure that proper precautions and equipment are specific.A vacuum truck is required to be on hand any time a pipeline is opened and drained.
Total Oil Storage Capacity of Tank(s) or Impoundment(s) From Which Material Discharged:	N/A ()
Enforcement Actions:	None, A written report was submitted to NJDEP
Effectiveness of Monitoring Equipment:	N/A
Spill Detection:	Visual by the Operator
Brief Summary of the Impact of the Spill:	N/A
Geographic Area:	N/A

*Reportable spill, as defined in 40 CFR Part 110, is a discharge of oil that violates applicable water quality standards or a discharge into or upon the navigable waters of the United States or adjoining shorelines in harmful quantities.

FIGURE C-9 - CONTAINMENT AND DRAINAGE PLANNING

FACTORS
Description of Containing/Controlling a Spill Through Drainage
Oil that may discharge into diked or undiked areas will be controlled and cleaned up as soon as practicable to prevent it leaving the Facility. DIKED STORAGE AREA DRAINAGE SYSTEMS Drainage of stormwater or other liquids accumulated within the Facility's diked storage area is controlled as follows: Drainage from diked storage area(s) is restrained by manually controlled valves. Dike drain valves are secured in the closed position when not draining containment area(s).

Flapper-type drain valves are not used to drain diked areas.

Water is visually inspected for product and discharged only if no product sheen is visible.

The preferred method of removal of accumulated stormwater is by natural evaporation providing that the accumulation does not damage the equipment/ structures or inhibit operations conducted within the containment area.

Stormwater which does accumulate within the diked area, and does not dissipate naturally, is pumped out in accordance with the stormwater drainage procedures.

Diked storage area drainage does not flow directly into an open watercourse

Diked storage area drainage does not flow directly into an open watercourse. Drainage from each diked area (i.e., Tank area) is controlled by a manually-operated valves. Drainage routes at the Facility are as follows:

(b) (7)(F) [redacted]

OWS-3 discharges into the adjacent tidal marsh and flows to teh Rahway River. Collected water in OWS-3 is sampled prior to discharge in accordance with the terminal's discharge permit. There are two manually-operated valves on the OWS-3 discharge line, which can be used to prevent discharges of oil and/or impacted water.

UNDIKED AREA DRAINAGE

Drainage from undiked areas is controlled as follows:

Releases which may occur at the truck loading rack area would be contained in the grated concrete drainage system. The entire truck loading rack is concrete lined and slopes towards the collection drains. Truck Loading Rack trench drains are directed to OWS-1, with final treatment within the Sediment Pond and OWS 3.

Collected runoff from Colonial Pipeline and Buckeye Area are directed to the Sediment Pond and OWS 3.

- Runoff from internal roadways and paved process areas are directed to OWS-1, Sediment Pond and/or OWS 3.

A discharge from a pipeline or valve leak in an undiked area (e.g., dock line between the dock and the pipeline manifold at the Terminal) could flow into the Rahway River or Arthur Kill, into streams that flow to Rahway River or Arthur Kill, or onto adjoining shorelines of these waterways.

Drainage of stormwater from undiked areas without pipe lines (e.g., parking lots) of the Facility is not controlled due to its origination from non-spill potential areas. Oil that may get into these areas would be cleaned up immediately and not allowed to drain off the property.

Site drainage is shown in Figure C-2.

FIGURE C-9 - CONTAINMENT AND DRAINAGE PLANNING

FACTORS
Available Volume of Containment
Refer to Figure C-1
Route(s) of Drainage
Refer to Figure C-2
Construction Materials Used in Drainage Troughs
Poly Propylene and Concrete Pipe
Type and Number of Valves Separators
(6) 4-inch Gate Valves and (1) 10-inch Gate Valve
Sump Pump Capacities
(12) 5.5 hp @ 770 GPM and (3) 3/4 hp @ 400 GPM
Containment Capacity of Weirs and Booms
The Sediment Pond has an emergency capacity of 100,000 gallons, and OWS #3 a capacity of 12,000 gallons.
Other Clean Up Materials
Refer to Section 7.1.1 and APPENDIX B

APPENDIX D Last Revised: July 2012

HAZARD EVALUATION AND RISK ANALYSIS

D.1 FACILITY HAZARD EVALUATION

A list of potential spill sources is identified in **FIGURE C-1**. This figure describes type and volumes of secondary containment areas along with tank manufacturer dates. All liquid storage tanks are visually inspected on a weekly basis. A description of facility operations is included in **FIGURE 1-2**.

D.2 VULNERABILITY ANALYSIS

A vulnerability analysis was performed to address the potential effects of an oil spill within the planning distance of this facility. Refer to **SECTION 6.7** for a detailed list of vulnerabilities. The following features may be impacted by a spill:

Water Intakes	Schools	Medical Facilities	Residential Areas	Businesses	Wetlands or other Sensitive Environments	Fish and Wildlife	Lakes and Streams	Endangered Flora and Fauna	Recreational Areas	Transportation Routes (air, land, water)	Utilities	Other Applicable Areas
x	x		x	x	x	x	x	x	x	x	x	x

D.2.1 Analysis of the Potential for a Spill

The probability of a spill occurring at this facility is minimal for the following reasons:

- Tanks are constructed in accordance with applicable engineering standards.
- Tank age is reviewed as a potential factor (refer to **FIGURE C-1**).
- Truck loading facilities are equipped with concrete pads with a spill collection drain system which returns spills to the recovery system.
- All trucks are monitored during tank unloading procedures.
- Product transfers, involving pipeline or marine vessel activity, are monitored as required by government regulations. Critical aspects of transfers (e.g., tank changes) which occur during normally unmanned hours are monitored by Pipeline Control Center staff (if applicable) and/or by overtime-duty staff brought in as needed.
- Facility tanks are inspected for evidence of corrosion and leaks according to applicable API 653 standards. Integrity and leak testing of buried piping is performed at the time of installation, modification, construction, relocation, or replacement. When a buried pipe section is exposed, it is examined, documented, and corrective actions are taken as necessary.
- Personnel are trained in procedures to prevent pollution.
- The horizontal range of a spill is dependent upon the topography and distance to the nearest water body described in more detail in **FIGURE D.4-1**.
- Company personnel prepare for natural disasters by monitoring weather reports and warnings and taking appropriate safety precautions.
- The potential for a natural disaster is acknowledged, as appropriate, during drills and exercises.

- Spill History is reviewed to understand historical conditions which lead to spills. After action investigations generate process upgrades to limit the potential of future incidents.

- Natural disasters are not likely at this facility; however, this facility may experience flooding, blizzards, tornadoes, earthquakes, or a lightning strike.

D.2.1 Analysis of the Potential for a Spill

- At this facility tanks are inspected and maintained in general accordance with industry standards and there have been no spills due to tank leaks or failures.

- Other Factors (such as unstable soil, earthquake zones, karst topography, etc.) considered in the likelihood of a release occurring. This facility is located in a geologically stable region as evidenced by: low earthquake hazards, stable underlying soils with no stability issues since it opened in 1923, and competent underlying are breccia, conglomerate, arkose sandstone, siltstone, and shale bedrock underlying the terminal. The likelihood of natural disaster at the terminal is generally limited to hurricane and blizzard conditions.

D.3 SPILL DETECTION / PREVENTION INSPECTION

D.3.1 Spill Detection

D.3.1 Spill Detection
Inspection
In accordance with 40 CFR 112.7 (e)(8), each facility includes written procedures and records of inspection. The inspections include tanks, secondary containment, and response equipment at the facility.
Facility self-inspection requires two steps:
Checklist of items to inspect and
Method of recording the actual inspection and its findings; records must be maintained for five years.
Facility specific procedures for transfer and secondary containment inspections are described in the SPCC Plan and summarized in APPENDIX C: FIGURE C-5. Response equipment inspection information is provided in SECTION 7.1.2.
Detection
Detection of a discharge from the Company system may occur in a number of ways including:
Visual detection by Company personnel, or
Visual detection by the public.
(b) (7)(F)
(b) (7)(F)

(b) (7)(F)

(b) (7)(F)

D.3.1 Spill Detection, CONTINUED

D.3.1 Spill Detection, Continued
Visual detection by Operating personnel
Discharges to the land or surface waters may be detected by Company personnel during regular operations and inspections. Inspections include daily "walk overs" (conducted three times each day), monthly visual inspections, annual inspections, and tank integrity testing, as summarized in Appendix C-5 and described in the SPCC Plan.
During the thrice daily walkovers, Terminal Operator observes the following: Sides of each tank are inspected for leaks; Foundation areas are inspected for evidence of seepage; Areas are inspected for accumulated petroleum products; and Areas of any ponded water and site drainage features are inspected for accumulated oil or hydrocarbon sheens.
In addition a daily inventory reconciliation is done Monday to Friday. Any imbalance is investigated to determine if a release is associated with the discrepancy.
Discharges to the land or surface waters also may 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:
A preliminary assessment of the incident area.
Notifications as per SECTION 3.
If appropriate, initiate initial response actions per SECTION 2.
FIGURE 2.1-2 provides a checklist or initial response actions.
Visual detection by the public
Signs are installed and maintained along the facility perimeter and provide the Facility 24-hour number for reporting emergency situations. If a notification is made to the Facility, facility personnel receiving the call will investigate the report and take appropriate actions for notifications and response, which may include, but are not limited to:
A preliminary assessment of the incident area.
Notifications as per SECTION 3.
If appropriate, initiate initial response actions per SECTION 2.

FIGURE 2.1-2 provides a checklist or initial response actions.
Alarm Verification Procedures and Subsequent Actions
See above for information on testing alarms on Automated detection system. Also, refer to FIGURE 2-1 for a description of warning alarms at the Facility.

D.3.2 Spill Prevention

Programs designed to prevent spill emergencies include:

- Corrosion control programs,
- Preventative maintenance programs,
- Controller training programs,
- Operator training programs,
- 24-hour emergency telephone numbers,
- (b) (7)(F)
- Inspection programs,
- Emergency response drills,
- Maintaining containment systems around tankage,
- Membership in one-call organizations, and
- Public awareness programs.

The purpose of these programs is to prevent or mitigate a potential release and subsequent emergency response.

FIGURE D.3-1 - RESPONSE EQUIPMENT INSPECTION

Records are maintained on-site for five (5) years. Other versions of this form may be used. Refer to **APPENDIX G** for additional information.

ITEM	QUANTITY	LOCATION	TIME TO ACCESS/RESPOND	CONDITION	DATE USED/TESTED	SHELF LIFE	INSPECTION DATE

Inspector's Signature

D.4 PLANNING DISTANCE CALCULATIONS

To evaluate the potential risk to sensitive resources in the area, should a spill occur, a planning distance was calculated based on the following characteristics of this Facility and vicinity according to 40 CFR 112, Appendix C Attachment C-III (40 CFR 112 C-III). Factors utilized include distance to the nearest body of moving water/storm sewer/drainage ditch or swale, geology, and topography of the area.

The planning distance was determined for a discharge that reaches the closest navigable water of the United States. Where the facility is adjacent to the closest navigable water, the planning distance calculation assumes that the time for a discharge to enter the water is negligible and the planning distance is based on movement of the discharge on the receiving water. Default planning distances are used for tidally influenced waters in accordance with 40 CFR Part 112 C-III 4.2 and US Coast Guard regulations 33 CFR 154.1305(b)(4)(iii)(B)(1), as described at the end of **FIGURE D.4-1**.

For oil transport on moving navigable water, velocity for the planning distance calculation is determined using the data from the closest representative U.S. Geological Survey (USGS) Gage Station instead of using the Chezy-Manning formula to calculate a velocity. In accordance with 40 CFR 112 C-III (2.5), data from a range of events is evaluated to determine the appropriate velocity, as shown in the supporting calculations. If data from a USGS Gage Station is not available for determining the velocity, then the Chezy-Manning formula will be used.

FIGURE D.4-1 provides the planning distance calculation worksheets for this Facility, based on using the Chezy-Manning formula to calculate a velocity.

Where USGS Gage Station data is used to determine the velocity, planning distance calculations, with supporting information and worksheets, are attached.

FIGURE D.4-1 - PLANNING DISTANCE CALCULATIONS

Intermediate Calculations

$\propto$ = elevation (in feet) = [stream elevation @ facility] - [stream elevation @ receptor (or 20 mile point)]

ß = horizontal distance from facility to receptor (or 20 mile point) in miles

s = average steam slope = $\propto$ / ß / 5280

r = hydraulic radius (in feet) = average mid channel depth x 0.667

n = Manning's roughness coefficient from Table A

To calculate stream velocity (in ft./sec.), use: $v = 1.5/n \times r^{2/3} \times s^{1/2}$

Calculation of **PLANNING DISTANCE**

d = calculated planning distance (miles)

v = Chezy-Manning based stream velocity (ft./Sec.)

t = spill response time interval

c = 0.68 (sec-mile/hr-ft conversion factor)

d = v x t x c = planning distance equation

Table A	
Manning's Roughness Coefficient for Various Natural Stream Types (n)	
Minor Streams (Top width < 100 ft.)	
Clean:	
Straight	.03

Winding	.04
Sluggish (woody, deep pools):	
No trees/brush	.06
Trees and/or brush	.10
Major Streams (Top width > 100 ft.)	
Regular section:	
No boulders/brush	.036
Irregular section:	
Brush	.06

FIGURE D.4-1 - PLANNING DISTANCE CALCULATIONS, CONTINUED

Site Investigation

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

From USGS Quad/Topographic Sheets

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

From Facility

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

From maps, local/state authorities or investigation

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

The total planning distance equals d = v x t x c.

	Carteret - Arthur Kill - tidally influenced
First receptor	N/A
First receptor location (miles)	N/A
∝ (feet)	N/A

ß (miles)	N/A
s (feet/mile)	N/A
Avg. mid-channel depth (feet)	N/A
r (feet)	N/A
n	N/A
v (feet/second)	N/A
t (hours)	N/A
c (seconds per mile/hours per foot)	N/A
d (total planning distance)	15 mile radius

FIGURE D.4-1 - PLANNING DISTANCE CALCULATIONS, CONTINUED

If Tidally Influenced

Planning distance calculations are based on the following factors and guidelines in accordance with 40 CFR Part 112 C-III, 4.2 and US Coast Guard regulations 33 CFR 154.1305(b)(4)(iii)(B)(1):

- The horizontal range of a potential oil spill is influenced by the wind direction and tidal stage; however, it is expected to spread quickly.
- Tidally influenced waters.
- Persistent and non-persistent product.
- Resulting planning distance is 15 miles persistent oils or five (5) miles for non-persistent oils from each Facility down current during ebb tide and to the point of maximum tidal influence or 15 miles persistent oils or five (5) miles for non-persistent oils, whichever is less, during flood tide.

D.5 DISCHARGE SCENARIOS

The equipment and personnel to respond to a spill are available from several sources and are provided with the equipment and contractors in **SECTION 7.1.1** and **APPENDIX B.1.1**. The following sections are discussions of these scenarios.

D.5.1 Small and Medium Discharge Scenarios

- The purpose of this section is to identify the sources and sizes of small and medium discharges as defined by OPA 90 regulations.
- Potential spill scenarios may include tank overflow, valve failure, tank failure, pipe failure, hose failure, or pump seal failure.

- The Company would respond to these types of incidents, regardless of agency jurisdiction, in the same manner as a worst case discharge, but at a level appropriate to the incident size; differences in response are described in the worst case scenario discussion described in this Appendix. The Company's response in such an event would in no way obviate the liability of any other responsible parties.

- Resources are identified in **FIGURE 3.1-4**, **SECTION 7.1.1**, and **APPENDIX B.1.1**.

- Terminal has contracted with OSROs to provide the required resources for oil spill response at the Facility within the applicable response tier requirements (Tier 1 = 6 hours; Tier 2 = 30 hours;
  Tier 3 = 54 hours).

For a small discharge, the Terminal has:

Contracted with OSROs that can provide 1,200 feet of containment boom (two times the length of the largest vessel that regularly conducts oil transfers to or from the facility) within the required time limit for small discharge (i.e., one hour). Note that in accordance with New Jersey regulations, vessels are boomed during oil transfers (except gasoline transfers).

Contracted with OSROs and response contractors that will provide sufficient oil recovery equipment with an aggregate effective daily recovery rate equal to the amount of oil discharged in a small discharge (i.e., 2,100 gallons) within the required time limit (i.e., two hours).

Sufficient oil storage capacity for recovered oily material equivalent to twice the effective daily recovery rate by using available tanks; obtaining portable tanks or tanker truck; and/or using OSRO resources.

D.5.1 Small and Medium Discharge Scenarios, Continued

The following table lists various facility operations and corresponding components which might be the source of a small, medium, and worst case discharge:

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

	Overfill	Overfill	
Oil storage tanks	Overfill	Overfill	Catastrophic failure of largest tank
Vehicle refueling	Hose failure	Pipeline failure Seal failure	Not Applicable
Age and condition of facility and components	Flange, gasket, threaded connector	Pipeline failure Seal failure	Catastrophic failure of largest tank

D.5.1 Small and Medium Discharge Scenarios, Continued

The following table describes Facility-specific EPA Small Discharge scenarios. Additional information on the Facility-specific initial response actions is in **FIGURE 2-1**.

SMALL DISCHARGE SCENARIO EPA Small Discharge or USCG Average Most Probable Discharge is a discharge of up to 50 barrels (2,100 gallons).
Scenarios: This facility is a complex facility, regulated by EPA, USCG, and USDOT PHMSA. The closest waterways are the Arthur Kill and the Rahway River. The surface topography of the area around the Terminal is relatively flat. The Upper Facility drains into a tidal marsh that discharges into the Rahway River and the Lower Facility drains into Arthur Kill. A spill of this size is not expected to migrate off-site, because the Terminal has absorbent pads and granular material, as well as contracts with OSROs to effectively respond to a small discharge. The worst probable chain reaction to a spill of this type would be fires caused by accidental sparks. Weather impacts would be minimal since most of the product would not leave the site. A small/average most probable discharge at this facility would most likely occur due to a major equipment failure or during product transfer. Examples may include, but not limited to: - A small discharge at a truck loading rack could potentially be caused by a hose rupture or puncture of a truck compartment and result in gasoline, distillate, or denatured ethanol spilling onto the pavement and traveling towards the rack drains. A chain reaction of failures is not probable. - A small discharge could potentially be caused by a tank leak or overfill, or a leak from piping, pumps, or valves inside a containment field, and result in gasoline, denatured ethanol, or distillate spilling onto the earthen dike floors and permeating into the ground. A chain reaction of failures is not probable. - A small discharge could potentially be caused by a pipeline or valve leak in an undiked area and result in gasoline, denatured ethanol, or distillate spilling onto the ground. A chain reaction of failures is not probable. - This type of discharge may potentially impact the land and/or water. - Site Plan Diagram is located in Figure 1-5 and Site Drainage Plan Diagram is located in Figure C-2. Potential Discharge Flow Paths: - A discharge at the truck loading rack would flow to the oil/water separator (OWS1). Travel offsite is not likely even if the drains for the oil/water separator are blocked or fail. The

Facility inspects the oil/water separator daily to observe that it is functioning properly.
- A discharge from a tank leak or overfill, or a leak from piping, pumps, or valves inside a containment field, would be contained within the secondary containment and travel offsite is not likely unless the secondary containment also fails. The Facility inspects the secondary containment dikes, daily to observe that it is in good condition, so travel offsite is not likely.
- A discharge from a pipeline or valve leak in an undiked area at the dock or between the dock and the terminal could cause a discharge that could flow into the Arthur Kill or the Rahway River.

Note: Equipment and manpower resources are detailed in **FIGURE 3.1-3**, **FIGURE 3.1-4**, **SECTION 7.1.1**, and **APPENDIX B.1.1**.

D.5.1 Small and Medium Discharge Scenarios, Continued

The following table describes Facility-specific EPA Small Discharge scenarios. Additional information on the Facility-specific initial response actions is in **FIGURE 2-1**.

SMALL DISCHARGE SCENARIO EPA Small Discharge or USCG Average Most Probable Discharge is a discharge of up to 50 barrels (2,100 gallons).
Equipment Resources: - Facility is equipped with a small amount of spill response equipment, as listed in Section 7.1.1. This equipment includes absorbent materials and hand tools. This equipment can be used to control a discharge by absorbing oil, constructing berms / ditched to prevent oil from entering a waterway. - Facility has contracts in place with OSROs and other contractors to provide additional response resources, as described below and in FIGURE 3.1-4, SECTION 7.1.1, and APPENDIX B. The OSROS and response contractors are able to provide additional manpower and containment / clean-up equipment for the response operation on land, water, or adjacent shorelines. Specifically, the Facility has identified sufficient resources, by contract or other approved means, to respond to a small discharge (see Appendix B.1). The Response resources shall, as appropriate, include: (i) 1,200 of containment boom) and a means of deploying it within one (1) hour of the discovery of a spill (ii) OSROS will provide oil recovery devices with an effective daily recovery capacity equal to the amount of oil discharged in a Small Discharge (i.e., 2,100 gallons). This equipment will be available at the Facility within two (2) hours of the detection of an oil discharge. (iii) Oil storage capacity for recovered oily material equivalent to twice the effective daily recovery rate (i.e., 2,400 gallons). Personal Resources: - The Facility Tactical Response Team (TRT) is comprised of the Terminal Manger and operating personnel, and they would be assisted by local emergency responders and OSRO personnel. If additional on-site assistance is needed the regional Incident Management Team (IMT) which is comprised of selected individuals trained in managing a serious incident will be contacted. - OSROs and other contractor responders will provide personnel as the situation requires. - The TRT and /or IMT will use the Incident Command System to manage emergency response activities.

Note: Equipment and manpower resources are detailed in **FIGURE 3.1-3**, **FIGURE 3.1-4**, **SECTION 7.1.1**, and **APPENDIX B.1.1**.

D.5.1 Small and Medium Discharge Scenarios, Continued

The following table describes Facility-specific EPA Small Discharge scenarios. Additional information on the Facility-specific initial response actions is in **FIGURE 2-1**.

SMALL DISCHARGE RESPONSE RESOURCE
- Terminal technician discovers release and contacts pipeline companies to shutoff deliveries - Technician notifies the terminal manager of situation and calls 911, as needed. - Technician contacts other onsite technicians for assistance and notifies them of incident. - Terminal manager verifies with technician size of release. - Terminal manager makes notifications to begin mobilization for response activities. Contacts made: (i) OSRO (ii) Area Manager (iii) Environmental Coordinator (iv) Safety Coordinator - Area Manager, Environmental Coordinator, and Safety Coordinator will begin making required external and internal notifications as indicated in Section 3. - Terminal Manager (Incident / On-Scene Commander) begins coordinating response activities with local emergency responders and OSROs for depending on the incident and site conditions at this time. - Incident Commander conducts a current hazard assessment: (i) Has initial containment been successful or has product migrated further downstream. (ii) Determine how fast material moving downstream. (iii) Approximate quantity that has passed initial containment. (iv) Necessity for additional downstream protective measures. If Discharge enters or may enter oil/water separator - Technicians use Facility's absorbent materials to control and collect discharged oil. - As appropriate, Technicians may allow discharge to enter the oil/water separator system and allow the system to function or Technicians may close valves on oil/water separator system to contain oil. - Vacuum trucks to be used to recover free product from oil/water separator. Begin recovery and evaluate disposal options. If Discharge on ground (diked area) - Technicians will confirm that drainage valves and/or pumps are closed and turned off (as appropriate) to prevent oil leaving containment area. Valves will be closed and pumps turned off, as needed. - Vacuum trucks will be used to recover free product. Begin recovery and evaluate disposal options.

Note: Equipment and manpower resources are detailed in **FIGURE 3.1-3**, **FIGURE 3.1-4**, **SECTION 7.1.1**, and **APPENDIX B.1.1**.

D.5.1 Small and Medium Discharge Scenarios, Continued

The following table describes Facility-specific EPA Small Discharge scenarios. Additional information on the Facility-specific initial response actions is in **FIGURE 2-1**.

SMALL DISCHARGE RESPONSE RESOURCE
If Discharge on ground (undiked area) - Technicians use Facility's absorbent materials and hand tools (e.g., shovels to make berms, ditches, or trenches to control and contain discharged oil or direct to containment areas. - Vacuum trucks to be used to recover free product. Begin recovery and evaluate disposal options. If Discharge enters or may enter a waterway - As appropriate, Technician makes call to OSROs to deploy boom and mobilize skimmers. - OSRO launches boat to watch for leading edge of discharge and install additional containment boom, as needed. - OSRO boat maintains position to observe discharge for possible further migration. - Hold current status briefing and evaluation of options. - Assess shoreline conditions between booms by visually walking banks or deployment of small boat. - Skimmers and vacuum trucks to be used to recover free product behind boom. Begin recovery and evaluate disposal options.

Note: Equipment and manpower resources are detailed in **FIGURE 3.1-3**, **FIGURE 3.1-4**, **SECTION 7.1.1**, and **APPENDIX B.1.1**.

D.5.1 Small and Medium Discharge Scenarios, Continued

The following table describes Facility-specific EPA Medium Discharge scenarios. Additional information on the Facility-specific initial response actions is in **FIGURE 2-1**.

MEDIUM DISCHARGE SCENARIO EPA Medium Discharge is a discharge of 2,100 gallons up to 36,000 gallons (857 barrels). (Note: USCG Maximum Most Probable Discharge is 50,400 gallons or 1,200 barrels.)
This facility is a complex facility, regulated by EPA, USCG, and USDOT PHMSA. A spill of this size is not expected to migrate off-site, because spilled material would be collect in the secondary containment system or catch basins and be routed to the oil/water separator system. If a spill of this size escaped the Upper Facility it could enter the Rahway River, if a spill of this size escaped the lower Facility it could enter the Arthur Kill. The worst probable chain reaction to a spill of this type would be fires caused by accidental sparks. Adverse weather conditions would increase the chances of a discharge entering the Rahway River or Arthur Kill. A medium/maximum most probable discharge at this facility would most likely occur due to a major equipment failure or during product transfer. Examples may include, but not limited to: -A medium discharge at a truck loading rack could potentially be caused by a puncture or rupture of a truck compartment and result in gasoline, distillate, or denatured ethanol spilling onto the pavement and traveling towards the rack drains. A chain reaction of failures could result from more than one the rupture of compartment or a collision between trucks.

-A medium discharge could potentially be caused by a tank leak or overfill, or a leak from piping, pumps, or valves inside a containment field, and result in gasoline, denatured ethanol, or distillate spilling onto the earthen dike floors and permeating into the ground. A chain reaction of failures is not probable.
-A medium discharge could potentially be caused by a pipeline or valve leak in an undiked area (e.g., between the dock and the pipe manifold at the Terminal) and result in gasoline, denatured ethanol, or distillate spilling onto the ground. A chain reaction of failures is not probable.

-This type of discharge may potentially impact the land and/or water.
-Site Plan Diagram is located in Figure 1-5 and Site Drainage Plan Diagram is located in Figure C-2.

Potential Discharge Flow Paths:
-A discharge at the truck loading rack would flow to the oil/water separator. Travel offsite is not likely even if the drains for the oil/water separator are blocked or fail or from a chain reaction of failures. The Facility inspects that oil/water separator and containment pit daily to observe that they are functioning properly. Closing discharge valves on the oil/water separator system would contain a release on-site. Travel offsite is not likely.

Note: Equipment and manpower resources are detailed in **FIGURE 3.1-3**, **FIGURE 3.1-4**, **SECTION 7.1.1**, and **APPENDIX B.1.1**.

D.5.1 Small and Medium Discharge Scenarios, Continued

The following table describes Facility-specific EPA Medium Discharge scenarios. Additional information on the Facility-specific initial response actions is in **FIGURE 2-1**.

MEDIUM DISCHARGE SCENARIO EPA Medium Discharge is a discharge of 2,100 gallons up to 36,000 gallons (857 barrels). (Note: USCG Maximum Most Probable Discharge is 50,400 gallons or 1,200 barrels.)
- A discharge from a tank leak or overfill, or a leak from piping, pumps, or vlves inside a containment field, would be contained within the secondary containment and travel offsite is not likely unless the secondary containment also fails. The Facility inspects the secondary containment dikes, daily to determine that it is in good condition, so travel offsite is not likely. -A discharge from a pipeline or valve leak in an undiked area could flow into the Rahway River or Arthur Kill or streams that flow to the Rahway River or Arthur Kill. Equipment Resources: The Facility will initially respond to a Medium/Maximum Most Probable Discharge in a similar manner as for the Small/Average Most Probable Discharge until the extent of the incident is determined. - Facility is equipped with a small amount of spill response equipment, as listed in Section 7.1.1. This equipment includes absorbent materials and hand tools. This equipment can be used to control a discharge by absorbing oil, constructing berms / ditched to prevent oil entering a waterway, etc. - Facility has contracts in place with OSROs and other contractors to provide additional response resources, as described below and in FIGURE 3.1-4, SECTION 7.1.1, and APPENDIX B. The OSROS and response contractors are able to provide additional manpower and containment / clean-up equipment for the response operation on land, water, or adjacent shorelines.

Specifically, the Facility has identified sufficient resources, by contract or other approved means, to respond to a medium discharge (see Appendix B.1). The Response resources shall, as appropriate, include:
(i) OSROs capable of arriving at the Facility within the required response resources for each Tier within the required time limits (Tier 1 = 6 hours; Tier 2 = 30 hours; Tier 3 = 54hours). For a medium discharge, OSROs are capable of providing sufficient oil recovery devices with an effective daily recovery capacity of 1,200 barrels (of the greater of the Medium or Maximum Most Probable Discharge volumes) on-scene (i.e., at the Terminal or dock) within 6 hours.
(ii) OSROs capable of providing sufficient containment boom for oil collection and containment and for protection of fish and wildlife and sensitive areas in the event that the spill migrates off-site and impacts or threatens to impact the Arthur Kill or other sensitive areas.
(iii) Sufficient oil storage capacity to sustain the effective daily recovery capacities from equipment identified above will be provided by the OSROs and/or made available within the Facility's available storage facilities. Additional recovery and storage equipment may be secured from other BP Products and contract resources, as the situation demands.

Note: Equipment and manpower resources are detailed in **FIGURE 3.1-3**, **FIGURE 3.1-4**, **SECTION 7.1.1**, and **APPENDIX B.1.1**.

D.5.1 Small and Medium Discharge Scenarios, Continued

The following table describes Facility-specific EPA Medium Discharge scenarios. Additional information on the Facility-specific initial response actions is in **FIGURE 2-1**.

MEDIUM DISCHARGE SCENARIO EPA Medium Discharge is a discharge of 2,100 gallons up to 36,000 gallons (857 barrels). (Note: USCG Maximum Most Probable Discharge is 50,400 gallons or 1,200 barrels.)
Personnel Resources: - The Facility Tactical Response Team (FTRT) is comprised of the Terminal Manger and operating personnel, and they would be assisted by local emergency responders and OSRO personnel. If additional on-site assistance is needed an Incident Management Team (IMT) which is comprised of selected individuals trained in managing a serious incident will be formed. - OSROs and other contractor responders will provide personnel as the situation requires. - The TRT and IMT will use the Incident Command System to manage emergency response activities.

Note: Equipment and manpower resources are detailed in **FIGURE 3.1-3**, **FIGURE 3.1-4**, **SECTION 7.1.1**, and **APPENDIX B.1.1**.

D.5.1 Small and Medium Discharge Scenarios, Continued

The following table describes Facility-specific EPA Medium Discharge scenarios. Additional information on the Facility-specific initial response actions is in **FIGURE 2-1**.

MEDIUM DISCHARGE RESPONSE RESOURCE
Tactical Response:

- Terminal technician discovers release and contacts Control RROm or Control Room and/or pipeline companies to shutoff deliveries
- Technician notifies the terminal manager of situation and calls 911, as needed.
- Technician contacts other onsite technicians for assistance and notifies them of incident.
- Terminal manager verifies with technician size of release.
- Terminal manager makes notifications to begin mobilization for response activities.
Contacts made:
(i) OSRO
(ii) Area Manager
(iii) Environmental Coordinator
(iv) Safety Coordinator

- Area Manager, Environmental Coordinator, and Safety Coordinator will begin making required external and internal notifications as indicated in Section 3.

- Terminal Manager (Incident / On-Scene Commander) begins coordination with local emergency responders for coordinating responsibilities reflective of site conditions at this time.

- Incident Commander conducts a current hazard assessment:
(i) Has initial containment been successful or has product migrated further downstream.
(ii) Determine how fast material moving downstream.
(iii) Approximate quantity that has passed initial containment.
(iv) Necessity for additional downstream protective measures.

If Discharge enters or may enter oil/water separator
- Technicians use Facility's absorbent materials to control and collect discharged oil.
- As appropriate, Technicians may allow discharge to enter the oil/water separator system and allow the system to function or Technicians may close valves on oil/water separator system to contain oil.
- Vacuum trucks to be used to recover free product from oil/water separator. Begin recovery and evaluate disposal options.

If Discharge on ground (diked area)
- Technicians will confirm that drainage valves and/or pumps are closed and turned off (as appropriate) to prevent oil leaving containment area. Valves will be closed and pumps turned off, as needed.
- Vacuum trucks will be used to recover free product. Begin recovery and evaluate disposal options.

If Discharge on ground (undiked area)
- Technicians use Facility's absorbent materials and hand tools (e.g., shovels) to make berms, ditches, or trenches to control and contain discharged oil or direct to containment areas.
- Vacuum trucks to be used to recover free product. Begin recovery and evaluate disposal options.

Note: Equipment and manpower resources are detailed in **FIGURE 3.1-3**, **FIGURE 3.1-4**, **SECTION 7.1.1**, and **APPENDIX B.1.1**.

D.5.1 Small and Medium Discharge Scenarios, Continued

The following table describes Facility-specific EPA Medium Discharge scenarios. Additional information on the Facility-specific initial response actions is in **FIGURE 2-1**.

MEDIUM DISCHARGE RESPONSE RESOURCE
If Discharge enters or may enter water - As appropriate, Technician makes call to OSROs to deploy boom and mobilize skimmers. - Terminal Manger makes verification that the first downstream surface water intake has been notified of potential impacts to them. Facility Name: Arthur Kill Generating Station Address: 4401 Victory Boulevard, Staten Island, NY 10314 Waterbody location: Arthur Kill, across from dock Emergency Contact #: (718) 390-2734 - OSRO to put protective booms before Arthur Kill Generating Station intakes for protection, then proceed to determine extent of discharge and then install additional containment boom where needed. - Nearest Alternate Launch Site: Carteret Municipal Ramp, Industrial Road, Carteret, NJ 07008 Tel: 732-541-3820 Ext. 3102; Arthur Kill 40 degrees 34.306 minutes, 74 degrees 12.802 minutes - OSRO boat maintains position to observe for possible further downstream migration. - Hold current status briefing and evaluation of options. - Assess shoreline conditions between booms by visually walking banks or deployment of small boat. - Skimmers and vacuum trucks to be used to recover free product behind boom. Begin recovery and evaluate disposal options.

Note: Equipment and manpower resources are detailed in **FIGURE 3.1-3**, **FIGURE 3.1-4**, **SECTION 7.1.1**, and **APPENDIX B.1.1**.

D.5.2 Worst Case Discharge (WCD) Scenario Discussion

APPENDIX D.7 provides worst case discharge calculations. Discussion of this scenario is as follows:

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

1. The First Responder would notify the Facility Terminal Manager (Alternate Qualified Individual) and notifications would be initiated in accordance with **FIGURE 2-1**. The Facility Terminal Manager will contact the Primary Qualified Individual, as appropriate.

2. The Alternate or Primary Qualified Individual would assume the role of Incident Commander until relieved and would initiate response actions and notifications in accordance with **SECTION 2**. If this were a small spill, the local/company personnel may handle all aspects of the response. Among those actions would be to:

    - Conduct safety assessment in accordance with **FIGURE 2-1** and evacuate personnel as needed in accordance with **SECTION 2**.

    - Direct responders to shut down ignition sources.

    - Direct personnel to position resources in accordance with **SECTION 2.1**.

    - Complete Preliminary Incident Report Form in accordance with **SECTION 3**.

- 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 Facility Tactical Response Team (FTRT). However, for a large spill, the Qualified Individual would assume the role of Incident Commander and would activate the entire FTRT and may activate the Incident Management Team (IMT) in accordance with activation procedures described in **SECTION 4.2**.

4. The Incident Commander would then initiate spill assessment procedures including surveillance operations, trajectory calculations, and spill volume estimating in accordance with **SECTION 2.1.3**.

5. The Incident Commander would then utilize checklists in **SECTION 4** as a reminder of issues to address. The primary focus would be to establish incident priorities and objectives and to brief staff accordingly.

6. The FTRT or IMT (as appropriate) would develop the following plans, as appropriate (some of these plans may not be required during a small or medium spill):

   - Incident Briefing Form (**SECTION 5.2.1**)
   - Site Safety and Health (**SECTION 5.3**)
   - Incident Action Plan (**SECTIONS 5.2.3** through **5.2.5**)
   - Disposal (**SECTION 5.5**)
   - Site Security (**SECTION 5.6**)
   - Decontamination (**SECTION 5.4**)
   - Demobilization (**SECTION 5.7**)

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

D.5.2 Worst Case Discharge (WCD) Scenario Discussion, Continued

The following table describes the Facility-specific EPA Worst-Case Discharge scenario.

WORST CASE Discharge Scenario
This facility is regulated by the EPA, US Coast Guard and US DOT Pipeline and Hazardous Materials Safety Administration, and is therefore a complex facility. Scenario: A worst-case discharge (WCD) at this Facility is considered to be a discharge that does not exceed (b) (7)(F) [redacted] This size discharge would most likely occur due to a natural disaster or catastrophic event. Severe rain events, tornadoes, and associated flooding would also increase the chances of an oil spill from leaving the property. Severe weather of this type could also negatively affect the response times of response contractors

and other responders. Potential chain reactions of failures (including include, but not be limited to, fires, health hazards, and discharges of more than one product) may be increased by the weather conditions, but chain reactions failures are not expected.

Examples of other WCD scenarios may include, but not be limited to:
- Tank leak or rupture, or a leak from or rupture of piping, pumps, or valves inside a containment field, and result in gasoline, denatured ethanol, or distillate spilling onto the earthen dike floors and permeating into the ground. A chain reaction of failures is not probable.
- Pipeline or valve leak or rupture in an undiked area (e.g., between the dock and the pipe manifold at the Terminal) that results in gasoline, denatured ethanol, or distillate spilling onto the ground. A chain reaction of failures is not probable.
- Potential impact to land and water
- Site map is located in Figure 1-5

Potential Discharge Flow Paths:
- A discharge from a tank leak or rupture, or a leak or rupture from piping, pumps, or valves inside a containment field, would be contained within the secondary containment and travel offsite is not likely unless the secondary containment also fails. The Facility inspects the secondary containment dikes, daily to observe that it is in good condition, so travel offsite is not likely.
- A discharge from a pipeline or valve leak in an undiked area could flow into the Rahway River or Arthur Kill or into streams that flow into the Rahway River or Arthur Kill.

Note: Equipment and manpower resources are detailed in **FIGURE 3.1-3**, **FIGURE 3.1-4**, **SECTION 7.1.1**, and **APPENDIX B.1.1**.

D.5.2 Worst Case Discharge (WCD) Scenario Discussion, Continued

WORST CASE Discharge Scenario, CONTINUED

Equipment Resources:
The Facility will initially respond to a WCD in a similar manner as for the Small/Average Most Probable Discharge until the extent of the incident is determined.
- Facility is equipped with a small amount of spill response equipment, as listed in Section 7.1.1. This equipment includes absorbent materials and hand tools. This equipment can be used to control a discharge by absorbing oil, constructing berms / ditched to prevent oil entering a waterway, etc.
- Facility has contracts in place with OSROs and other contractors to provide additional response resources, as described below and in FIGURE 3.1-4, SECTION 7.1.1, and APPENDIX B. The OSROS and response contractors are able to provide additional manpower and containment / clean-up equipment for the response operation on land, water, or adjacent shorelines.

Specifically, the Facility has identified sufficient resources, by contract or other approved means, to respond to a WCD (see Appendix B.1). The Response resources shall, as appropriate, include:
(i) OSROs capable of arriving at the Facility within the required response resources for each Tier within the required time limits (Tier 1 = 6 hours; Tier 2 = 30 hours; Tier 3 = 54hours). The required recovery capacities and storage volumes are described in Section D.7.
(ii) OSROs capable of providing sufficient containment boom for oil collection and containment and for protection of fish and wildlife and sensitive areas in the event that the

spill migrates off-site and impacts or threatens to impact the Arthur Kill or other sensitive areas.
(iii) Sufficient oil storage capacity to sustain the effective daily recovery capacities from equipment identified above will be provided by the OSROs and/or made available within the Facility's available storage facilities. Additional recovery and storage equipment may be secured from other BP Products and contract resources, as the situation demands.

Personal Resources:
- The Facility Tactical Response Team (TRT) is comprised of the Terminal Manger and operating personnel, and they would be assisted by local emergency responders and OSRO personnel. If additional on-site assistance is needed an Incident Management Team which is comprised of selected individuals trained in managing a serious incident will be formed.
- OSROs and other contractor responders will provide personnel as the situation requires.
- The response team will use the Incident Command System to manage emergency response activities.

D.5.2 Worst Case Discharge (WCD) Scenario Discussion, Continued

The following table describes the Facility-specific EPA Worst-Case Discharge response resource.

WORST CASE Discharge RESPONSE RESOURCE
Tactical Response: - Terminal technician discovers release and contacts pipeline companies to shutoff deliveries - Technician notifies the terminal manager of situation and calls 911, as needed. - Technician contacts other onsite technicians for assistance and notifies them of incident. - Terminal manager verifies with technician size of release. - Terminal manager makes notifications to begin mobilization for response activities. Contacts made: (i) OSRO (ii) Area Manager (iii) Environmental Coordinator (iv) Safety Coordinator - Area Manager, Environmental Coordinator, and Safety Coordinator will begin making required external and internal notifications as indicated in Section 3 of the FRP. - Terminal Manager (On-Scene Commander) begins coordination with local emergency responders for coordinating responsibilities reflective of site conditions at this time. - On-Scene Commander conducts a current hazard assessment: (i) Has initial containment been successful or has product migrated further downstream. (ii) Determine how fast material moving downstream. (iii) Approximate quantity that has passed initial containment. (iv) Necessity for additional downstream protective measures. If Discharge enters or may enter oil/water separator - Technicians may allow discharge to enter oil/water separator and allow system to function or be Technicians may close valves on oil/water separator to contain oil. - Vacuum trucks to be used to recover free product from oil/water separator. Begin recovery and evaluate disposal options. If Discharge on ground (diked area) - Technicians will confirm that drainage valves and/or pumps are closed and turned off (as

appropriate) to prevent oil leaving containment area. Valves will be closed and pumps turned off, as needed.
- Vacuum trucks will be used to recover free product. Begin recovery and evaluate disposal options.

If Discharge on ground (undiked area)
- Technicians use Facility's absorbent materials, hand tools (e.g., shovels), and front-end loader to make berms, ditches, or trenches to control and contain discharged oil or direct to containment areas.

- Vacuum trucks to be used to recover free product. Begin recovery and evaluate disposal options.

Note: Equipment and manpower resources are detailed in **FIGURE 3.1-3**, **FIGURE 3.1-4**, **SECTION 7.1.1**, and **APPENDIX B.1.1**.

D.5.2 Worst Case Discharge (WCD) Scenario Discussion, Continued

WORST CASE Discharge RESPONSE RESOURCE, CONTINUED
If Discharge enters or may enter water - As appropriate, Technician makes call to OSROs to deploy boom and mobilize skimmers. - Terminal Manger makes verification that the first downstream surface water intake has been notified of potential impacts to them. Facility Name: Arthur Kill Generating Station Address: 4401 Victory Boulevard, Staten Island, NY 10314 Waterbody location: Arthur Kill, across from dock Emergency Contact #: (718) 390-2734 - OSRO to put protective booms before Arthur Kill Generating Station intakes for protection, then proceed to determine extent of discharge and then install additional containment boom where needed. - Nearest Alternate Launch Site: Carteret Municipal Ramp, Industrial Road, Carteret, NJ 07008 Tel: 732-541-3820 Ext. 3102; Arthur Kill (b) (7)(F) [redacted] - OSRO boat maintains position to observe for possible further downstream migration. - Hold current status briefing and evaluation of options. - Assess shoreline conditions between booms by visually walking banks or deployment of small boat. - Skimmers and vacuum trucks to be used to recover free product behind boom. Begin recovery and evaluate disposal options. - OSRO to deploy additional protective booms as warranted.

FIGURE D.5-1 TRAJECTORY ANALYSIS

Click here to view -Under Review

D.5.3 Description of Factors Affecting Response Efforts

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

FACTORS	CONSIDERATIONS AFFECTING RESPONSE EFFORTS
Size of spill	• Small up to 2,100 gallons (50 barrels) • Medium more than 2,100 gallons to 36,000 gallons (857 barrels) • WCD 857 barrels to terminal capacity; refer to **APPENDIX D.7**. • Location of spill in relation identified sensitivities and/or sensitive areas. • Spread and spill movement.
Proximity to down gradient water intakes	• Refer to **SECTION 6.7** for a list of facilities with water intakes on the Arthur Kill and to **SECTION 6.8** for maps showing proximity to down gradient water intakes.
Proximity to fish and wildlife and sensitive environments	• A release could impact fish, wildlife, and sensitive environments as described in **SECTION 6.6** and **SECTION 6.7**.
Likelihood that discharge will travel off-site	• A small spill has the potential to travel off-site via overland flow to Arthur Kill, streams that flow into Arthur Kill, or adjoining shorelines (see **Appendix D: D.5.1**). • A medium spill has the potential to travel off-site via overland flow to Arthur Kill, streams that flow into Arthur Kill, or adjoining shorelines (see **Appendix D: D.5.1**). • A worst case discharge has the potential to travel off-site via overland flow to to Arthur Kill, streams that flow into Arthur Kill, or adjoining shorelines (see **Appendix D: D.5.2**).
Location of material spilled	• Material could be spilled at a: • - Truck Loading Rack, which would result in product (i.e., gasoline, distillate, or denatured ethanol) discharging onto the pavement and traveling towards the Facility storm drain system. • - Tank or from piping, pumps, or valves inside a containment field, and result in product discharging onto the earthen floors of a diked containment field. • - Pipeline or valve in an undiked area and result in product discharging onto the ground (pavement or earth).

	• Additional information on locations of materials spilled is in **SECTIONS D.5.1** and **D.5.2**. Facility tankage, piping, and transfer areas shown on **FIGURE 1-5** and **APPENDIX C: FIGURE C-2**. Facility drainage information is shown on **APPENDIX C: FIGURE C-2**.

D.5.3 Description of Factors Affecting Response Efforts

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

FACTORS	CONSIDERATIONS AFFECTING RESPONSE EFFORTS
Material discharged	Materials handled by the Terminal that may be released / discharged include: • Alkylate • Denatured Ethanol • Diesel Fuel • Gasoline • Naphtha • Product is considered non-persistent but not volatile
Weather or aquatic conditions	• Facility area has the potential to be affected by hurricanes, tornadoes, flooding, and severe weather.
Available remediation equipment	• The Company has response equipment available. • Resources are available through oil spill response contractors in quantities sufficient to meet applicable planning standards.
Probability of a chain reaction or failures	• Potential for a chain reaction or failure is remotely possible but not anticipated; secondary containment, response contractors, and trained personnel minimize the potential of such events.
Direction of spill pathway	• Refer to potential flow path description in **APPENDIX D.5.1** and **D.5.2** and **FIGURE C-2**: Site Drainage Diagram. • Refer to sensitivity maps in the **SECTION 6.8** • Wind direction and speed combined with currents will determine spill trajectory. • A discharge at the • - Truck Loading Rack would flow to the oil/water

	separator. Travel offsite is not likely unless the drains for the oil/water separator or containment pit are blocked or fails. • - Tank or from piping, pumps, or valves inside a containment field, would be contained within the secondary containment and travel offsite is not likely unless the secondary containment also fails. • - Pipeline or valve leak in an undiked area in the Upper Facility could flow eastward into the tidal adjacent marsh and then into the Rahway River. • - Pipeline or valve leak in an undiked area in the Lower Facility could flow southward into the Arthur Kill.
Disposal	• Refer to waste management procedures in **SECTION 7.3**.

D.6 PLANNING VOLUME CALCULATIONS

Once the worst case discharge volume has been calculated, response resources must be identified to meet the requirements of 40 CFR 112.20(h). Calculations to determine sufficient amount of response equipment necessary to respond to a worst case discharge is described below. A demonstration of the planning volume calculations is provided below.

D.7 SPILL VOLUME CALCULATIONS

D.7.1 USCG Portion of Facility

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

The Worst Case Discharge is based on a catastrophic failure of all piping carrying oil between the marine transfer manifold(s) and the non-transportation related portion(s) of the Facility. For the Carteret, this volume is calculated as noted below. Actual Worst Case Discharge volumes for all facilities are provided in **FIGURE D.7-1**. Oil spill response equipment available to respond to this spill is included in **SECTION 7.1.1**, and **APPENDIX B.1.1**.

(b) (7)(F)

[redacted]

AP (b) (7)(F)

[redacted]

D.7 SPILL VOLUME CALCULATIONS, CONTINUED

D.7.2 EPA portion of the facility (non-transportation related)

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

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

TYPE	DESCRIPTION	PRODUCT	WCD VOLUME (BBLs)
(b) (7)(F) [redacted]			

FIGURE D.7-1 - WORST CASE DISCHARGE (WCD) CALCULATIONS (IN BBLS)

(b) (7)(F)

[redacted]

Planning volume data is included on the following page:

EPA PLANNING VOLUME DATA

STEP	PARAMETER	Carteret
(A)	WCD (bbls)	(b) (7)(F) [redacted]
(B)	Oil group	I
(C)	*Geographic area	Nearshore/Inland

(D1)	Percent lost to natural dissipation	80
(D2)	Percent recovered floating oil	20
(D3)	Percent oil onshore	10
(E1)	On water recovery (bbls)	(b) (7)(F)
(E2)	Shoreline recovery (bbls)	
(F)	Emulsification Factor	1.0
(G)	On water recovery resource mobilization factor	
(G1)	Tier I	0.15
(G2)	Tier II	0.25
(G3)	Tier III	0.40
Part II	On water recovery capacity (bbls/day)	
	Tier I	(b) (7)(F)
	Tier II	
	Tier III	
Part III	Shoreline cleanup volume (bbls/day)	
Part IV	On water response capacity by operating area (bbls/day)	
(J1)	Tier I	12,500
(J2)	Tier II	25,000
(J3)	Tier III	50,000
Part V	On water amount needed to be identified, but not contracted for in advance	
	Tier I	0
	Tier II	0
	Tier III	0

* R = Rivers and canals
N = Nearshore/Inland

EPA PLANNING VOLUME DATA

STEP	PARAMETER	Carteret
(A)	WCD (bbls)	(b) (7) (F)
(B)	Oil group	II
(C)	*Geographic area	Nearshore/Inland
(D1)	Percent lost to natural dissipation	50
(D2)	Percent recovered floating oil	50

(D3)	Percent oil onshore	30
(E1)	On water recovery (bbls)	(b) (7)(F) [redacted]
(E2)	Shoreline recovery (bbls)	
(F)	Emulsification Factor	1.8
(G)	On water recovery resource mobilization factor	
(G1)	Tier I	0.15
(G2)	Tier II	0.25
(G3)	Tier III	0.40
Part II	On water recovery capacity (bbls/day)	
	Tier I	(b) (7)(F) [redacted]
	Tier II	
	Tier III	
Part III	Shoreline cleanup volume (bbls/day)	
Part IV	On water response capacity by operating area (bbls/day)	
(J1)	Tier I	12,500
(J2)	Tier II	25,000
(J3)	Tier III	50,000
Part V	On water amount needed to be identified, but not contracted for in advance	
	Tier I	0
	Tier II	0
	Tier III	0

* R = Rivers and canals
N = Nearshore/Inland

D.7.3 DOT / PHMSA Portion of Pipeline / Facility

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

1. The pipeline's maximum shut-down response time in hours (based on historic discharge data or in the absence of such data, the operators best estimate), multiplied by the maximum flow rate expressed in barrels per hour (based on the maximum daily capacity of the pipeline), plus the largest drainage volume after shutdown of the line section(s) in the response zone expressed in barrels; or

2. The largest foreseeable discharge for the line section(s) within a response zone, expressed in barrels (cubic meters), based on the maximum historic discharge, if one exists, adjusted for any subsequent corrective or preventative action taken; or

3. If the response zone contains one or more breakout tanks, the capacity of the single largest tank or battery of tanks within a single secondary containment system, adjusted for the capacity or size of the secondary containment system, expressed in barrels.

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

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

* Note: The facilities do not have tertiary containment.

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

D.7.3 DOT / PHMSA Portion of Pipeline / Facility, Continued

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 was 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.

These tank volumes are as follows:

LOCATION	VOLUME (BBLS)

(b) (7)(F)

[redacted]

D.8 PIPELINE - ABNORMAL CONDITIONS

PHMSA considers the “substantial threat” term to be equivalent to the “abnormal conditions” term under 49 CFR Part 195.402(d), procedures to identify events and conditions that can pose a threat of Worst Case Discharge, and actions to take for preventing and mitigating such events and conditions, are described in the Operating, Maintenance, and Emergency Procedures for Hazardous Liquids Manual.

D.9 PRODUCT CHARACTERISTICS AND HAZARDS

This Facility may store various types of commodities, including, but not limited to:

- Alkylate
- Denatured Ethanol
- Diesel Fuel
- Gasoline
- Naphtha

The key chemical and physical characteristics of each of these oils and/or other small quantity products/
chemicals are identified in the MSDS. The MSDS can be obtained by the facility via the Company intranet at http://msds.bpweb.bp.com/login.asp.

FIGURE D.9-1 describes primary oils handled.

FIGURE D.9-1 - SUMMARY OF COMMODITY CHARACTERISTICS

COMMON NAME	MSDS NAME	HEALTH HAZARD	FLASH POINT	SPECIAL HAZARD	REACTIVITY	HEALTH HAZARD WARNING STATEMENT
Alkylate	Alkylate	2	3	0	0	Do not ingest. If ingested do not induce vomiting. Avoid contact with eyes skin and clothing. Do not breathe vapor or mist. Keep away from heat sparks and flame.
Denatured Ethanol	Denatured Ethyl Alcohol	1	3	0	0	May cause nervous system depressions or effects.
Diesel Fuel	Ultra Low Sulfur Disel	1	2	0	0	Prolonged/repeated skin exposure, inhalation or ingestion of this material above the recommended limits may result in adverse dermal or systemic effects.
	RFG					Contains benzene, a chemical known to cause cancer in humans. Repeated and prolonged overexposure to benzene vapors

Gasoline	Unleaded Gasoline	1	3	C	0	may cause leukemia, aplastic anemia, or other blood disorders, immunotoxicity, reproductive harm, or fetal toxicity.
Naphtha	Appropriate product name	1	3	NA	0	May cause nerve or kidney damage.

Health Hazard	**4 = Extremely Hazardous 3 = Hazardous 2 = Warning 1 = Slightly Hazardous 0 = No Unusual Hazard**	**Fire Hazard (Flash Point)**	**4 = Below 73°F, 22°C 3 = Below 100°F, 37°C 2 = Below 200°F, 93°C 1 = Above 200°F, 93°C 0 = Will not burn**
Special Hazard	**A = Asphyxiant C = Contains Carcinogen W = Reacts with Water Y = Radiation Hazard COR = Corrosive OX = Oxidizer H_2S = Hydrogen Sulfide P = Contents under Pressure T = Hot Material**	**Reactivity Hazard**	**4 = May Detonate at Room Temperature 3 = May Detonate with Heat or Shock 2 = Violent Chemical Change with High Temperature and Pressure 1 = Not Stable if Heated 0 = Stable**

APPENDIX E Last Revised: March 2012

CROSS-REFERENCES

FIGURE E-1 - EPA / FRP CROSS-REFERENCE

EPA FRP REQUIREMENTS	LOCATION
Response Plan Cover Sheet (sec. 2.0)	
General Information (sec. 2.1)	
Facility Name	Figure E-5
Facility Address	Figure E-5
Facility Telephone	Figure E-5
Mailing Address (if different from Facility Address)	Figure E-5
Facility Owner/Operator	Figure E-5
Facility Owner & Operator Address (recommended)	Figure E-5
Facility Owner Telephone (recommended)	Figure E-5
Dun and Bradstreet Number	Figure E-5
Longitude (degrees, minutes, seconds)	Figure E-5
Latitude (degrees, minutes, seconds)	Figure E-5
North American Industrial Classification System (NAICS) Code	Figure E-5
Facility Start Up Date (recommended)	Figure E-5
Facility Acres (recommended)	Figure E-5
Name of Protected Waterway or Environmentally Sensitive Area	Figure E-5
Distance to Navigable Water	Figure E-5
Worst Case Discharge Amount	Figure E-5
Maximum Oil Storage Capacity	Figure E-5
Largest AST Capacity (gallons)	Figure E-5
Total Number of ASTs	Figure E-5
Total Number of USTs	Figure E-5
Total UST Storage	Figure E-5
Total Storage of Drums & Transformers that contain Oil	Figure E-5
Number of Surface Impoundments and Total Storage of Surface Impoundments	Figure E-5
Applicability of Substantial Harm Criteria (sec. 2.2)	Figure E-5
Certification (sec. 2.3)	Figure E-5
Model Facility-Specific Response Plan (sec. 1.0)	
Emergency Response Action Plan (ERAP) (sec. 1.1)	
Separate Section of FRP	ERAP
Qualified Individual (QI) Information (sec. 1.2) partial	ERAP - Figure 3-3
Emergency Notification Phone List (sec. 1.3.1) partial	ERAP - Figure 3-3, Figure 3-4
Spill Response Notification Form (sec. 1.3.1) partial	ERAP - Figure 3-2

FIGURE E-1 - EPA / FRP CROSS-REFERENCE, CONTINUED

EPA FRP REQUIREMENTS	LOCATION
Emergency Response Action Plan (ERAP) (sec. 1.1), Continued	
Response Equipment List and Location (sec. 1.3.2) complete	ERAP - Figure 5-2, Figure 5-3
Response Equipment Testing and Deployment (sec. 1.3.3) complete	ERAP - Figure 5-4
Facility Response Team List (sec. 1.3.4) partial	ERAP - Figure 3-3
Evacuation Plan (sec. 1.3.5) condensed	ERAP - Section 2.11, Section 2.11.1
Immediate Actions (sec. 1.7.1) complete	ERAP - Section 2.0
Facility Diagrams (sec. 1.9) complete	ERAP - Figure 6-1, Figure 6-2, Figure 6-3
Facility Information (sec. 1.2)	
Facility Name (sec. 1.2.1)	Figure 1-2
Street Address	Figure 1-2
City, State, Zip Code	Figure 1-2
County	Figure 1-2
Phone Number	Figure 1-2
Latitude and Longitude (sec. 1.2.2)	Figure 1-2
Wellhead Protection Area (sec. 1.2.3)	Figure 1-2
Owner/Operator (both names included, if different (sec. 1.2.4)	Figure 1-2
QuaIified Individual Information (sec. 1.2.5) (name, position, home and work street addresses, phone numbers) and description of specific response training experience	Figure 1-2, Figure A.2-2, Figure A.2-3
Date of Oil Storage Start-up (sec. 1.2.6)	Figure 1-2
Current Operation (sec. 1.2.7)	Figure 1-2
Dates and Types of Substantial Expansion (sec. 1.2.8)	Figure 1-2, Figure C-1
SIC and NAICS Codes	Figure 1-2
Emergency Response Information (sec. 1.3)	
Notification (sec. 1.3.1)	
National Response Center (NRC) phone number	Figure 3.1-4
Qualified Individual (day and evening) phone numbers	Figure 1-2, Figure 3.1-3
Company Response Team (day and evening) phone numbers	Figure 3.1-3

Federal On-Scene Coordinator (OSC) and/or Regional Response Center (day and evening) phone numbers	Figure 3.1-4
Local Response Team phone numbers (Fire Department/Cooperatives)	Figure 3.1-4
Fire Marshal (day and evening) phone numbers	Figure 3.1-4
State Emergency Response Commission (SERC) (day and evening) phone numbers	Figure 3.1-4
State Police phone number	Figure 3.1-4
Local Emergency Planning Committee (LEPC) phone number	Figure 3.1-4

FIGURE E-1 - EPA / FRP CROSS-REFERENCE, CONTINUED

EPA FRP REQUIREMENTS	LOCATION
Notification (sec. 1.3.1), Continued	
Local Water Supply System (day and evening) phone numbers	Figure 3.1-4
Weather Report phone number	Figure 3.1-4
Local Television/Radio Station phone number(s) for Evacuation Notification	Figure 3.1-4
Spill Response Contractor(s)	Figure 3.1-3, Figure 3.1-4
Hospital phone number	Figure 3.1-4
Wastewater Treatment Facility(s) name and phone number (recommended)	Section 6.8 (ISS)
Factories/Utilities with Water Intakes (recommended)	Section 6.8 (ISS)
Trustees of Sensitive Areas (recommended)	Section 6.8 (ISS)
Spill Response Notification Form	
• Reporter's Name, Position, Phone Number	Figure 3.1-2
• Company Information	Figure 3.1-2
• Were Materials Discharged	Figure 3.1-2
• Meeting Federal Obligations to Report	Figure 3.1-2
• Calling for Responsible Party	Figure 3.1-2
• Time Called	Figure 3.1-2
• Incident Description (source/cause)	Figure 3.1-2

• Date/Time of Incident	Figure 3.1-2
• Incident Address/Location	Figure 3.1-2
• Nearest City/State/County/Zip	Figure 3.1-2
• Distance from City/Units of Measure/Direction from City, Section, Township, Range, Borough	Figure 3.1-2
• Container Type/Tank Oil Storage Capacity/Units of Measure	Figure 3.1-2
• Facility Oil Storage Capacity/Units of Measure	Figure 3.1-2
• Facility Longitude and Latitude	Figure 3.1-2
Response Equipment List (Identify if Facility, OSRO, CO-OP owned by letters O, F, or C) (sec. 1.3.2)	
Skimmers/Pumps (Operational Status, Type/Model/Year, Number or Quantity, Capacity, Daily Effective Recovery Rate, Storage Location)	Section 7.1.1, Figure 7.1-1, Appendix B.1.1, Figure B.1-1
Boom (Containment Boom: Operational Status, Year, Number, Skirt Size. Sorbent Boom: Operational Status, Type/Model/Year, Number, Size (Length))	Section 7.1.1, Figure 7.1-1, Appendix B.1.1, Figure B.1-1
Chemical Countermeasures Agents Stored	Section 7.1.1, Figure 7.1-1, Appendix B.1.1, Figure B.1-1
Sorbents (Type, Year Purchased, Amount, Storage Location)	Section 7.1.1, Figure 7.1-1, Appendix B.1.1, Figure B.1-1

FIGURE E-1 - EPA / FRP CROSS-REFERENCE, CONTINUED

EPA FRP REQUIREMENTS	LOCATION
Response Equipment List (Identify if Facility, OSRO, CO-OP owned by letters O, F, or C) (sec. 1.3.2), Continued	
Hand Tools (Type, Quantity, Storage Location)	Section 7.1.1, Figure 7.1-1, Appendix B.1.1, Figure B.1-1
Communications Equipment (Operational Status, Type, Operational Frequency, Quantity)	Section 7.1.1, Figure 7.1-1, Appendix B.1.1, Figure B.1-1
Fire Fighting and Personnel Protective Equipment	Section 7.1.1, Figure 7.1-1, Appendix B.1.1,

	Figure B.1-1
Other (e.g., Heavy Equipment, Cranes, Dozers, etc.) (Operational Status, Type, and Year, Quantity, Storage Location)	Section 7.1.1, Figure 7.1-1, Appendix B.1.1, Figure B.1-1
Equipment Location	Section 7.1.1, Figure 7.1-1, Appendix B.1.1, Figure B.1-1
Amount of oil that emergency response equipment can handle and limitations (e.g., launching sites) must be described.	Section 6.9, Section 7.1.1, Figure 7.1-1, Appendix B.1.1, Figure B.1-1
Response Equipment Testing/Deployment (sec. 1.3.3)	
Last inspection or equipment test date	Figure A.1-4
Inspection frequency	Figure A.1-4
Last deployment drill date	Figure A.1-4
Deployment frequency	Figure A.1-4
OSRO certification (if applicable)	Figure A.1-4, Appendix B.1.1, Figure B.1-1
Response Personnel (sec. 1.3.4)	
Emergency Response Personnel Information (Personnel whose duties involve responding to emergencies, including oil discharges, even when they are not present at the site)	Figure 3.1-3
• Name	Figure 3.1-3
• Phone Numbers (work/home, other)	Figure 3.1-3
• Response Time	Figure 3.1-3
• Responsibility	Figure 3.1-3
• Type and Date of Response Training	Figure 3.1-3, Figure A.2-3
Emergency Response Contractor Information	Figure 3.1-3, Figure 3.1-4, Figure 7.1-1, Appendix B
• Names	Figure 3.1-3, Figure 3.1-4, Figure 7.1-1, Appendix B
• Phone Numbers	Figure 3.1-3, Figure 3.1-4
• Response Time	Figure 3.1-3, Appendix B
• Evidence of Contractual Arrangements	Figure B.1-1

FIGURE E-1 - EPA / FRP CROSS-REFERENCE, CONTINUED

EPA FRP REQUIREMENTS	LOCATION
Response Personnel (sec. 1.3.4), Continued	
Facility Response Team Information (Composed of Emergency Response Personnel and Emergency Response that will respond immediately)	Figure 3.1-3
• Name	Figure 3.1-3
• Job Function of Emergency Response Personnel	Figure 3.1-3
• Response Time	Figure 3.1-3
• Phone/Pager	Figure 3.1-3
• Name of Emergency Response Contractor (Contractors providing facility response team services may be different than contractors providing oil spill response services)	Figure 3.1-3
• Response Time	Figure 3.1-3
• Phone/Pager	Figure 3.1-3
Evacuation Plans (sec. 1.3.5)	
Facility Evacuation Plan (sec. 1.3.5.1)	Section 2.6.1, Section 2.6.2
• Location of stored materials	Section 2.6.2
• Hazard imposed by spilled materials	Section 2.6.2
• Spill flow direction	Section 2.6.2
• Prevailing wind directions and speed	Section 2.6.2
• Water currents, tides, or wave conditions (if applicable)	Section 2.6.2
• Arrival route of emergency response personnel and response equipment	Section 2.6.2
• Evacuation routes	Section 2.6.2
• Alternative routes of evacuation	Section 2.6.2
• Transportation of injured personnel to nearest medical facility	Section 2.6.2

• Location of alarm/notification systems	Section 2.6.2, Figure 2-1
• Centralized check-in area for roll call	Section 2.6.2
• Mitigation command center location	Section 2.6.2
• Location of shelter at facility	Section 2.6.2
Community Evacuation Plans referenced (sec. 1.3.5.3)	Section 2.6.2
Evacuation routes shown on diagram	"FRP Figure C-3 or ERAP Figure 6-3 Evacuation Diagram"
Qualified Individual's Duties (sec. 1.3.6)	
Description of duties	Section 4.5
• Activate internal alarms and hazard communications systems	Section 4.5
• Notify Response Personnel	Section 4.5
• Identify character, exact source, amount and extent of the release	Section 4.5

FIGURE E-1 - EPA / FRP CROSS-REFERENCE, CONTINUED

EPA FRP REQUIREMENTS	LOCATION
Qualified Individual's Duties (sec. 1.3.6), Continued	
• Notify and provide information to appropriate Federal, State and local authorities	Section 4.5
• Assess interaction of spilled substance with water and/or other substances stored at facility and notify on-scene personnel of assessment	Section 4.5
• Assess possible hazards to human health and environment	Section 4.5
• Assess and implement prompt removal actions	Section 4.5
• Coordinate rescue and response actions	Section 4.5
• Access company funding to initiate cleanup activities	Section 4.5
• Direct cleanup activities	Section 4.5

Consistent with requirements	Section 4.5
Qualified Individual identified with the Facility Information	Figure 1-2
Hazard Evaluation (sec. 1.4)	
Hazard Identification (sec. 1.4.1)	
Tank Above Ground and Below Ground:	Figure C-1
• Tank number(s)	Figure C-1
• Substance(s) Stored	Figure C-1
• Quantity(s) Stored	Figure C-1
• Tank Type(s)/Year(s) of Construction	Figure C-1
• Maximum Capacity(s)	Figure C-1
• Failure(s)/Cause(s)	Figure C-1
Surface Impoundments (SI):	Figure C-1
• SI Number(s)	Figure C-1
• Substance(s) Stored	Figure C-1
• Quantity(s) Stored	Figure C-1
• Surface Area(s)/Year(s) of Construction	Figure C-1
• Maximum Capacity(s)	Figure C-1
• Failure(s)/Cause(s)	Figure C-1
Labeled schematic drawing	"FRP Figure 1-5 or ERAP Figure 6-1 Site Plan"
Description of transfers (loading and unloading) and volume of material	Figure 1-2
Description of daily operations	Figure 1-2
Secondary containment volumes	Figure 1-2, Figure C-1
Normal daily throughput of the facility	Figure 1-2

FIGURE E-1 - EPA / FRP CROSS-REFERENCE, CONTINUED

EPA FRP REQUIREMENTS	LOCATION

Vulnerability Analysis (sec. 1.4.2)	
Analysis of the potential effects of an oil spill on vulnerable areas. **(Attachment C-III to Appendix C of this part provides a method that owners or operators shall use to determine appropriate distances from the facility to fish and wildlife and sensitive environments. Owners or operators can use a comparable formula that is considered acceptable by the RA. If a comparable formula is used, documentation of the reliability and analytical soundness of the formula must be attached to the Response Plan Cover Sheet).**	Figure D.4-1
• Water intakes	Section 6.7, Section 6.8
• Schools	Section 6.7, Section 6.8
• Medical facilities	Section 6.7, Section 6.8
• Residential areas	Section 6.7, Section 6.8
• Business	Section 6.7, Section 6.8
• Wetlands or other environmentally sensitive areas	Section 6.7, Section 6.8
• Fish and wildlife	Section 6.7, Section 6.8
• Lakes and streams	Section 6.7, Section 6.8
• Endangered flora and fauna	Section 6.7, Section 6.8
• Recreational areas	Section 6.7, Section 6.8
• Transportation routes (air, land, and water)	Section 6.7, Section 6.8
• Utilities	Section 6.7, Section 6.8
• Other applicable areas (List below)	Section 6.7, Section 6.8
• Other areas:	Section 6.7, Section 6.8
Analysis of Potential for a Spill (sec. 1.4.3)	
Description of likelihood of release occurring	Appendix D.2.1
• Oil spill history for the life of the facility	Appendix D.2.1, Figure C-8
• Horizontal range of potential spill	Appendix D.2.1, Figure D.4-1, Figure D.5-1
• Vulnerability to natural disaster	Appendix D.2.1

• Other factors, such as tank age	Appendix D.2.1, Figure C-1
• Other factors (e.g., unstable soils, earthquake zones, Karst topography, etc.)	Appendix D.2.1
Facility Reportable Oil Spill History Description (sec. 1.4.4)	
Date of discharge(s)	Figure C-8
List of discharge causes	Figure C-8
Material(s) discharged	Figure C-8
Amount of discharges in gallons	Figure C-8
Amount of discharge that reached navigable waters (if applicable)	Figure C-8
Effectiveness and capacity of secondary containment	Figure C-8
Clean-up actions taken	Figure C-8
Steps taken to reduce possibility of reoccurrence	Figure C-8

FIGURE E-1 - EPA / FRP CROSS-REFERENCE, CONTINUED

EPA FRP REQUIREMENTS	LOCATION
Facility Reportable Oil Spill History Description (sec. 1.4.4), Continued	
Total oil storage capacity of tank(s) or impoundment(s) from which material discharged	Figure C-8
Enforcement actions	Figure C-8
Effectiveness of monitoring equipment	Figure C-8
Description(s) of how each spill was detected	Figure C-8
Discharge Scenarios (sec. 1.5)	
Small and Medium Discharges (sec. 1.5.1)	
Small Discharges (sec. 1.5.1) (Description of small discharges addressing facility operations and components including but not limited to: (sec. 1.5.1.1)	
Loading and unloading operations	Appendix D.5.1
Facility maintenance operation	Appendix D.5.1
Facility piping	Appendix D.5.1
Pumping stations and sumps	Appendix D.5.1
Oil storage tanks	Appendix D.5.1
Vehicle refueling operations	Appendix D.5.1
Age and condition of facility components	Appendix D.5.1
Small volume discharge calculation for a facility	Appendix D.5.1
Facility-specific spill potential analysis	Appendix D.5.1
Average most probable discharge for complexes	Appendix D.5.1, Appendix D.7.1, Figure D.7-1

1,000 feet of boom (1 hour deployment time)	Section 7.1.1, Figure 7.1-1, Appendix B, Appendix D.5.1
Correct amount of boom for complexes	Appendix D.5.1
Oil recovery devices equal to small discharge (2 hour recovery time)	Section 7.1.1, Figure 7.1-1, Appendix B, Appendix D.5.1
Oil storage capacity for recovered material	Section 7.1.1, Figure 7.1-1, Appendix B, Appendix D.5.1
Scenarios Affected by the Response Efforts (sec. 1.5.1.2)	
Size of the discharge	Appendix D.5.1, Appendix D.5.3
Proximity to downgradient wells, waterways and drinking water intakes	Appendix D.5.1, Appendix D.5.3, Section 6.7, Section 6.8
Proximity to fish and wildlife and sensitive environments	Appendix D.5.1, Appendix D.5.3, Section 6.7, Section 6.8
Likelihood that the discharge will travel off-site (i.e., topography, drainage)	Appendix D.5.1, Appendix D.5.3
Location of the material discharged (i.e., on a concrete pad or directly on the soil)	Appendix D.5.1, Appendix D.5.3
Material discharged	Appendix D.5.1, Appendix D.5.3
Weather or aquatic conditions (i.e., river flow)	Appendix D.5.1, Appendix D.5.3

FIGURE E-1 - EPA / FRP CROSS-REFERENCE, CONTINUED

EPA FRP REQUIREMENTS	LOCATION
Scenarios Affected by the Response Efforts (sec. 1.5.1.2), Continued	
Available remediation equipment	Appendix D.5.1, Appendix D.5.3
Probability of a chain reaction of failures	Appendix D.5.1, Appendix D.5.3
Direction of discharge pathway	Appendix D.5.1, Appendix D.5.3
Medium Discharges (sec. 1.5.1) (Description of medium discharges scenarios addressing facility operations and components including but not limited to: (sec. 1.5.1.1)	
Loading and unloading operations	Appendix D.5.1
Facility maintenance operation	Appendix D.5.1
Facility piping	Appendix D.5.1
Pumping stations and sumps	Appendix D.5.1
Oil storage location	Appendix D.5.1
Vehicle refueling operations	Appendix D.5.1
Age and condition of facility components	Appendix D.5.1
Medium volume discharge calculation for a facility	Appendix D.5.1

Facility-specific spill potential analysis	Appendix D.5.1
Maximum most probable discharge for complexes	Appendix D.5.1, Appendix D.7.1, Figure D.7-1
Oil recovery devices equal to medium discharge	Section 7.1.1, Figure 7.1-1, Appendix B, Appendix D.5.1
Availability of sufficient quantity of boom	Section 7.1.1, Figure 7.1-1, Appendix B, Appendix D.5.1
Oil storage capacity for recovered material	Section 7.1.1, Figure 7.1-1, Appendix B, Appendix D.5.1
Scenarios Affected by the Response Efforts (sec. 1.5.1.2)	
Size of the discharge	Appendix D.5.1, Appendix D.5.3
Proximity to downgradient wells, waterways and drinking water intakes	Appendix D.5.1, Appendix D.5.3, Section 6.7, Section 6.8
Proximity to fish and wildlife and sensitive environments	Appendix D.5.1, Appendix D.5.3, Section 6.7, Section 6.8
Likelihood that the discharge will travel off-site (i.e., topography, drainage)	Appendix D.5.1, Appendix D.5.3
Location of the material discharged (i.e., on a concrete pad or directly on the soil)	Appendix D.5.1, Appendix D.5.3
Material discharged	Appendix D.5.1, Appendix D.5.3
Weather or aquatic conditions (i.e., river flow)	Appendix D.5.1, Appendix D.5.3
Available remediation equipment	Appendix D.5.1, Appendix D.5.3
Probability of a chain reaction of failures	Appendix D.5.1, Appendix D.5.3
Direction of discharge pathway	Appendix D.5.1, Appendix D.5.3

FIGURE E-1 - EPA / FRP CROSS-REFERENCE, CONTINUED

EPA FRP REQUIREMENTS	LOCATION
Worst Case Discharge (WCD) (sec. 1.5.2) (see Appendix A) (When planning for the worst case discharge response all of the factors listed in the small and medium discharge section of the response plan shall be addressed)	
Facility Specific Worst Case Discharge Scenario	Appendix D.5.2
Description of worst case discharges scenarios addressing facility operations and components including but not limited to: (sec. 1.5.1.1)	Appendix D.5.2
• Loading and unloading operations	Appendix D.5.1
• Facility maintenance operation	Appendix D.5.1
• Facility piping	Appendix D.5.1

• Pumping stations and sumps	Appendix D.5.1
• Oil storage location	Appendix D.5.1
• Vehicle refueling operations	Appendix D.5.1
• Age and condition of facility components	Appendix D.5.1
• Correct Worst Case Discharge (WCD) calculation for specific type of facility (Appendix D)	Appendix D.7
• Correct Worst Case Discharge calculation for complexes	Appendix D.5.2, Appendix D.7.1, Figure D.7-1
• Sufficient response resources for WCD (Appendix E)	Figure 3.1-4, Figure 7.1-1, Appendix B, Appendix D.7
• Sources and quantity of equipment for response to WCD	Section 7.1.1, Figure 7.1-1, Appendix B, Appendix D.7
• Oil storage capacity for recovered material	Section 7.1.1, Figure 7.1-1, Appendix B, Appendix D.7
Scenarios Affected by the Response Efforts (sec. 1.5.1.2)	
Size of the discharge	Appendix D.5.2, Appendix D.5.3
Proximity to downgradient wells, waterways and drinking water intakes	Appendix D.5.2, Appendix D.5.3, Section 6.7, Section 6.8
Proximity to fish and wildlife and sensitive environments	Appendix D.5.2, Appendix D.5.3, Section 6.7, Section 6.8
Likelihood that the discharge will travel off-site (i.e., topography, drainage)	Appendix D.5.2, Appendix D.5.3
Location of the material discharged (i.e., on a concrete pad or directly on the soil)	Appendix D.5.2, Appendix D.5.3
Material discharged	Appendix D.5.2, Appendix D.5.3
Weather or aquatic conditions (i.e., river flow)	Appendix D.5.2, Appendix D.5.3
Available remediation equipment	Appendix D.5.2, Appendix D.5.3
Probability of a chain reaction of failures	Appendix D.5.2, Appendix D.5.3
Direction of discharge pathway	Appendix D.5.2 (WCD

	Scenario), Appendix D.5.3

FIGURE E-1 - EPA / FRP CROSS-REFERENCE, CONTINUED

EPA FRP REQUIREMENTS	LOCATION
Discharge Detection Systems (sec. 1.6)	
Discharge Detection by Personnel (sec. 1.6.1)	
Description of procedures and personnel for spill detection	Appendix D.3.1
Description of facility inspections	Figure C-5, Appendix D.3.1
Description of initial response actions	Figure 2-1, Appendix D.3.1
Emergency Response Information (referenced)	Figure 3.1-4
Automated Discharge Detection (sec. 1.6.2)	
Description of automatic spill detection equipment, including overfill alarms and secondary containment sensors	Appendix D.3.1
Description of alarm verification procedures and subsequent actions	Figure 2-1 (First Responder last entry), Appendix D.3.1
Plan Implementation (sec. 1.7)	
Response Resources for Small, Medium and Worst Case Discharges (sec. 1.7.1)	
Demonstration of accessibility of proper response personnel and equipment	Appendix B, Figure D.7-1
Description of response actions	Section 2, Appendix D.5.1, Appendix D.5.2
• Emergency plans for spill response	Section 2, Appendix D.5.1, Appendix D.5.2
• Additional response training	Appendix A.2
• Additional contracted help	Appendix B.1.1, Figure B.1-1
• Access to additional response equipment/experts	Appendix B.1.1, Figure B.1-1
• Ability to implement plan, including training and practice drills	Appendix A.1 (Exercise Requirements), Appendix A.2 (Training Program)
Recommended form detailing Immediate Actions for Small, Medium, and Worst Case spills (sec. 1.7.1.2A) (Stop the Product Flow, Warn Personnel, Shut Off Ignition Sources, Initiate Containment, Notify NRC, Notify OSC, Notify (as appropriate))	Figure 2-1, Figure D.7-1

Disposal Plans (sec. 1.7.2)	
Description of procedures for recovering, reusing, decontaminating or disposing of materials	Section 7.3, Figure 7.3-4
Materials addressed in Disposal Plan **(Recovered product, contaminated soil, contaminated equipment and materials (including drums, tank parts, valves and shovels), personnel protective equipment, decontamination solutions, absorbents, spent chemicals)**	Figure 7.3-4
Plan prepared in accordance with any Federal, State and/or local regulations	Section 7.3
Plan addresses permits required to transport or dispose of recovered materials	Figure 7.3-4

FIGURE E-1 - EPA / FRP CROSS-REFERENCE, CONTINUED

EPA FRP REQUIREMENTS	LOCATION
Containment and Drainage Planning (sec. 1.7.3)	
Containment and drainage plan available	Figure C-9
• Description of containing/controlling a spill through drainage	Figure C-9
• Containment volume	Figure C-9
• Drainage route from oil storage and transfer areas	Figure C-9
• Construction materials in drainage troughs	Figure C-9
• Type and number of valves separators in drainage system	Figure C-9
• Sump pump capacities	Figure C-9
• Containment capacity of weirs and booms and their location	Figure C-9
• Other clean up materials	Figure C-9
Self-Inspection, Training, and Meeting Logs (sec. 1.8)	
Facility Self-Inspection (sec. 1.8.1)	
Records of tank inspections with dates (Tank Leaks, Tank Foundations, Tank Piping) contained or cross-referenced in plan or maintained electronically for five years (sec. 1.8.1.1)	Figure C-5
Records of secondary containment inspections with dates (Dike or Berm System, Secondary Containment, Retention and Drainage Ponds) contained or	Figure C-5

cross-referenced in plan or maintained electronically for five years (sec. 1.8.1.3)	
Response Equipment Inspection (sec. 1.8.1.2)	
Inventory (item and quantity)	Figure D.3-1
Storage location	Figure D.3-1
Accessibility (time to access and respond)	Figure D.3-1
Operational status/condition	Figure D.3-1
Actual use/testing (last test date and frequency of testing)	Figure D.3-1
Shelf life (present age, expected replacement date)	Figure D.3-1
Inspection date	Figure D.3-1
Inspector's signature	Figure D.3-1
Inspection records maintained for 5 years	Figure D.3-1
Response Equipment Inspection Log (Inspector, Date, Comments)	Figure A.1-7
Facility Drills/Exercises (sec. 1.8.2)	
Description of drill/exercise program based on PREP guidelines or other comparable program	Appendix A.1, Figure A.1-2
• Qualified Individual Notification Drills	Figure A.1-2
• Spill Management Team Tabletop Exercises	Figure A.1-2
• Equipment deployment exercise	Figure A.1-2
• Unannounced exercise	Figure A.1-2
• Area exercise	Figure A.1-2

FIGURE E-1 - EPA / FRP CROSS-REFERENCE, CONTINUED

EPA FRP REQUIREMENTS	LOCATION
Facility Drills/Exercises (sec. 1.8.2), Continued	
Description of evaluation procedures for drill program	Figure A.1-2

Qualified Individual Notification Drill Log (sec. 1.8.2.1) (Date, company, qualified individual, other contacted, emergency scenario, evaluation)	Figure A.1-5
Spill Management Team Tabletop Drill Log (sec. 1.8.2.2) (Date, company, qualified individual, participants, emergency scenario, evaluation, changes to be implemented, time table for implementation)	Figure A.1-6
Response Training (sec. 1.8.3)	
Description of response training program (including topics)	Figure A.2-1, Figure A.2-2
Personnel Response Training Logs (name, response training date/and number of hours, prevention training date/and number of hours)	Figure A.2-3
Discharge Prevention Meeting Log (date, attendees)	Figure C-4
Diagrams (sec. 1.9)	
Site Plan Diagram	
Entire facility to scale	"FRP Figure 1-5 or ERAP Figure 6-1 Site Plan"
Above and below-ground bulk storage tanks	"FRP Figure 1-5 or ERAP Figure 6-1 Site Plan"
Contents and capacities of bulk oil storage tanks	"FRP Figure 1-5 or ERAP Figure 6-1 Site Plan"
Contents and capacities of drum storage areas	"FRP Figure 1-5 or ERAP Figure 6-1 Site Plan"
Contents and capacities of surface impoundments	"FRP Figure 1-5 or ERAP Figure 6-1 Site Plan"
Process buildings	"FRP Figure 1-5 or ERAP Figure 6-1 Site Plan"
Transfer areas	"FRP Figure 1-5 or ERAP Figure 6-1 Site Plan"
Location and capacity of secondary containment systems	"FRP Figure 1-5 or ERAP Figure 6-1 Site Plan"
Location of hazardous materials (structures where hazardous materials are stored or handled, including materials stored and capacity of storage)	"FRP Figure 1-5 or ERAP Figure 6-1 Site Plan"
Location of communications and emergency response equipment	"FRP Figure 1-5 or ERAP Figure 6-1 Site Plan"

Location of electrical equipment that might contain oil	"FRP Figure 1-5 or ERAP Figure 6-1 Site Plan"
If the Facility is a Complex Facility, the interface between EPA and other regulating agencies	"FRP Figure 1-5 or ERAP Figure 6-1 Site Plan"

FIGURE E-1 - EPA / FRP CROSS-REFERENCE, CONTINUED

EPA FRP REQUIREMENTS	LOCATION
Site Drainage Plan Diagram	
Major sanitary and storm sewers, manholes, and drains	"FRP Figure C-2 or ERAP Figure 6-2 Drainage Diagram"
Weirs and shut-off valves	"FRP Figure C-2 or ERAP Figure 6-2 Drainage Diagram"
Surface water receiving streams	"FRP Figure C-2 or ERAP Figure 6-2 Drainage Diagram"
Fire fighting water sources	"FRP Figure C-2 or ERAP Figure 6-2 Drainage Diagram"
Other utilities	"FRP Figure C-2 or ERAP Figure 6-2 Drainage Diagram"
Response personnel ingress and egress	"FRP Figure C-2 or ERAP Figure 6-2 Drainage Diagram"
Equipment transportation routes	"FRP Figure C-2 or ERAP Figure 6-2 Drainage Diagram"
Direction of spill flow from release points	"FRP Figure C-2 or ERAP Figure 6-2 Drainage Diagram"
Site Evacuation Diagram	
Site plan diagram with evacuation routes	"FRP Figure C-3 or ERAP Figure 6-3 Evacuation Diagram"
Location of evacuation regrouping areas	"FRP Figure C-3 or ERAP Figure 6-3 Evacuation Diagram"
Site Security (sec. 1.10)	
Emergency cut-off locations	Figure 7.2-2

Enclosure	Figure 7.2-2
Guards and their duties, day and night	Figure 7.2-2
Lighting	Figure 7.2-2
Valve and pump locks	Figure 7.2-2
Pipeline connection caps	Figure 7.2-2

FIGURE E-2 - USCG / FRP CROSS-REFERENCE

USCG OPA 90 REQUIREMENTS (33 CFR 154.1035)	LOCATION IN THIS PLAN
a) Introduction and Plan Content	
1. Facility Name and Location (address, city, county, state, zip, phone number, fax number).	Figure 1-2
2. Facility Directions (including but not limited to maps, landmarks and river mile that could aid a responder and reviewer).	Figure 1-2, Figure 1-3
3. Name, address and procedures for contacting the facility's owner or operator on a 24 hour basis.	Figure 1-2, Figure 3.1-3
4. Table of contents.	Table of Contents
5. Period when submitted plan does not have to conform to the subpart, a cross index, if appropriate.	Figure E-2
6. Record of change(s) to record information on plan updates.	After Table of Contents
b) Emergency Response Action Plan	
1. Notification procedures • Prioritized list of facility response personnel. • Federal, State or local agencies, as required • Spill response notification forms to Federal, State, local agencies. Form must state that initial notification must not be delayed by collection of data. • Notification of the National Response Center.	Section 3
2. Facility's spill mitigation procedures • Describe volume and oil groups that would be involved in the following: • Average, maximum and worse discharge from the MTR facility. • Where applicable, the worst case discharge from the non-transportation-related facility.	Section 2.1.1, Figure 2.1-2, Appendix D

• Prioritized list of procedures and facility personnel (identified by job title). Procedures must address actions to be taken in the event of a discharge, potential discharge or emergency involving the following equipment and scenarios:
• Transfer equipment
  • Tank overfill or failure
  • Piping rupture, leak both under pressure and not under pressure
  • Explosion or fire
  • Equipment failure
• Listing of equipment and the responsibilities of facility personnel to mitigate an average most probable discharge	

3. Facility's response activities	
i. Responsibilities of facility personnel to initiate a response and supervise response resources pending arrival of qualified individuals.	Figure 2.1-1

FIGURE E-2 - USCG / FRP CROSS-REFERENCE, CONTINUED

USCG OPA 90 REQUIREMENTS (33 CFR 154.1035)	LOCATION IN THIS PLAN
ii. Responsibilities and authority of the qualified individual and alternate as required in § 154.1026.	Section 4.5
iii. Apply the following organizational structure to manage response actions: • Command and control • Public information • Safety • Liaison with government agencies • Spill operations • Planning • Logistics support • Finance	Section 4.6
iv. Identify oil spill removal organizations and the spill management teams to be capable of providing the following response resources: • Equipment and supplies to meet § 154.1045, 154.1047, as appropriate • Trained personnel for response to be on hand for the first 7 days of the response	Section 7.1, Appendix B

Job descriptions for each spill management team member within the organizational structure in a response action.	
v. For mobile facilities in more than one COTP zone, oil spill removal organizations and the spill management teams must be identified from paragraph (3)(iv) and included in each COTP zone.	N/A
4. Sensitive areas	
i. Identify areas of economic importance and environmental sensitivities as identified in the ACP, which are potentially impacted by a worst case discharge.	Section 6.7, Section 6.8
ii. For a worst case discharge the plan must address the following:· • List all sensitive elements identified in ACP that are potentially impacted by a discharge· • Describe all response actions anticipated to protect sensitive elements· • Contain map or chart that depicts each response action anticipated.	Section 6, Appendix D.5
iii. Identify appropriate equipment and personnel as described in § 154.1028 to protect sensitive elements by one of the following calculations: • Persistent oils and non-petroleum oils discharged into non-tidal waters, the distance from the facility reached in 48 hours at maximum current.	Section 7.1, Appendix B, Appendix D

FIGURE E-2 - USCG / FRP CROSS-REFERENCE, CONTINUED

USCG OPA 90 REQUIREMENTS (33 CFR 154.1035)	LOCATION IN THIS PLAN
• Persistent and non-petroleum oils discharged into tidal waters, 15 miles from the facility down current during ebb tide and to the point of maximum tidal influence or 15 miles, whichever is less, during flood tide. • Non-persistent oils discharged into non-tidal waters, the distance from the facility reached in 24 hours at maximum current. • Non-persistent oils discharged into tidal waters,	Section 7.1, Appendix B, Appendix D

5 miles from the facility down current during ebb tide and to the point of maximum tidal influence or 5 miles, whichever is less, during flood tide. • Spill trajectory or model maybe substituted if acceptable to COTP. • Procedures contained in the Environmental Protection's Agency's regulations on oil pollution prevention may be substituted for non-tidal and tidal waters. • COTP may require additional sensitive elements to be protected depending on trajectory.	
5. Disposal plan Describe actions and procedures that adhere to Federal, state or local requirements.	Section 5.5, Section 7.3
c) Training and Exercises	
1. Training procedures of the facility owner or operator must meet requirements of § 154.1050.	Appendix A
2. Drill procedures of the facility owner or operator must meet requirements of § 154.1055.	Appendix A
d) Plan Review and Update Procedures	
Plan review and update procedures of the facility owner or operator must meet requirements of §154.1065 and any post-discharge review of the plan to evaluate and validate its effectiveness.	Section 1.2
e) Appendices	
1. Facility-specific information - principal characteristics	
i. Identify sizes, types and number of vessels the facility can transfer oil to or from simultaneously.	Figure 1-2
ii. Identify the first valve(s) on piping separating transportation-related and non-transportation-related areas. If piping serves tank vessels from a manifold it is considered the first valve.	Figure 1-5
iii. The oil(s) and hazardous material handled, stored or transported in bulk must be documented and include the following: • Generic/chemical name • Description of appearance and odor • Hazards involved with handling or discharge • Firefighting procedures and extinguishing agents for oil/hazardous materials	Appendix D.9

FIGURE E-2 - USCG / FRP CROSS-REFERENCE, CONTINUED

USCG OPA 90 REQUIREMENTS (33 CFR 154.1035)	LOCATION IN THIS PLAN
2. List of contacts must include primary and alternate personnel, personnel from paragraph (b) (3) (iv), and Federal, state and local officials.	Figure 3.1-3, Figure 3.1-4
3. Equipment list and records must include the following: • List of equipment and facility personnel required to respond to an average most probable discharge, as defined by §154.1020 • List of equipment belonging to an oil spill removal organization as described in §154.1028; unless the organization has been classified by the Coast Guard to equal or exceed the response capability needed by the facility • When it is necessary for the appendix to contain a listing of response equipment, it shall include the following: skimmers; booms; dispersant application; in-situ burning; bioremediation equipment and supplies and other equipment used to apply other chemical agents on the NCP Product Schedule; communications, firefighting and beach cleaning equipment; boats and motors; and heavy equipment • This list must also include specifications for each piece of equipment as follows: 1. type, make, model and year of manufacture, 2. for oil recovery devices, the effective daily recovery rate, 3. for containment boom, the overall boom height and type of end connectors, 4. spill scenario in which the equipment will be used, 5. total daily capacity for storage and disposal of recovered daily oil 6. for communication equipment, the type and amount of equipment intended for use during response activities, 7. location of equipment, and 8. date of last inspection.	Section 7.1, Appendix B

4. Communications plan must describe the primary and alternate method of communication during discharges, including communications at the facility and at remote locations.	Section 7.1.6
5. Site specific safety and health plan must describe the safety and health plan to be implemente This appendix may reference another existing plan requiring under 29 CFR 1910.120	Section 5.3
6. List of acronyms and definitions must include all definitions that are critical to understanding the response plan.	Appendix F

FIGURE E-3 - DOT / PHMSA CROSS-REFERENCE

OPA 90 REQUIREMENTS (49 CFR 194)	LOCATION
Information Summary	
• For the core plan:	
• Name and address of operator	Figure 1-2
• For each Response Zone which contains one or more line sections that meet the criteria for determining significant and substantial harm (§194.103), listing and description of Response Zones, including county(s) and state(s)	Figure 1-2
• For each Response Zone appendix:	
• Information summary for core plan	Section 1
• QI names and telephone numbers, available on 24-hr basis	Figure 1-2, Figure 3.1-3
• Description of Response Zone, including county(s) and state(s) in which a worst case discharge could cause substantial harm to the environment	Figure 1-2
• List of line sections contained in Response Zone, identified by milepost or survey station or other operator designation	Figure 1-2
• Basis for operator’s determination of significant and substantial harm	Figure 1-2
• The type of oil and volume of the worst case discharge	Appendix D

• Certification that the operator has obtained, through contract or other approved means, the necessary private personnel and equipment to respond, to the maximum extent practicable, to a worst case discharge or threat of such discharge	Section 1.3, Appendix B
Notification Procedures	
• Notification requirements that apply in each area of operation of pipelines covered by the plan, including applicable state or local requirements	Figure 3.1-4
• Checklist of notifications the operator or Qualified Individual is required to make under the response plan, listed in the order of priority	Figure 3.1-1, Figure 3.1-3, Figure 3.1-4, Section 4.2
• Name of persons (individuals or organizations) to be notified of discharge, indicating whether notification is to be performed by operating personnel or other personnel	Figure 3.1-1, Figure 3.1-3, Figure 3.1-4, Section 4.2
• Procedures for notifying Qualified Individuals	Figure 3.1-1, Section 4.2
• Primary and secondary communication methods by which notifications can be made	Section 7.1.6

FIGURE E-3 - DOT / **PHMSA** CROSS-REFERENCE, CONTINUED

OPA 90 REQUIREMENTS (49 CFR 194)	LOCATION
• Information to be provided in the initial and each follow-up notification, including the following: • Name of pipeline • Time of discharge • Location of discharge • Name of oil recovered • Reason for discharge (e.g. material failure, excavation damage, corrosion) • Estimated volume of oil discharged • Weather conditions on scene • Actions taken or planned by persons on scene	Figure 3.1-2
Spill Detection and On-Scene Spill Mitigation Procedures	
• Methods of initial discharge detection	Appendix D.3
• Procedures, listed in order of priority, that personnel are required to follow in responding to a pipeline emergency to mitigate or prevent any discharge from the pipeline	Section 2

• List of equipment that may be needed in response activities based on land and navigable waters including:
  • Transfer hoses and pumps
  • Portable pumps and ancillary equipment
  • Facilities available to transport and receive oil from a leaking pipeline
	Section 7.1.1, Appendix B

• Identification of the availability, location, and contact phone numbers to obtain equipment for response activities on a 24-hour basis	Figure 3.1-4, Appendix B
• Identification of personnel and their location, telephone numbers, and responsibilities for use of equipment in response activities on a 24-hour basis	Figure 3.1-3, Section 7.1, Appendix B
Response Activities	
• Responsibilities of, and actions to be taken by, operating personnel to initiate and supervise response actions pending the arrival of the Qualified Individual or other response resources identified in the response plan	Section 2, Section 4.5, Appendix B
• Qualified Individual's responsibilities and authority, including notification of the response resources identified in the response plan	Section 4.5
• Procedures for coordinating the actions of the operator or Qualified Individual with the action of the OSC responsible for monitoring or directing those actions	Section 4.4, Section 4.5
• Oil spill response organizations (OSRO) available through contract or other approved means, to respond to a worst case discharge to the maximum extent practicable	Appendix B

• For each organization identified under paragraph (d), a listing of:
  • Equipment and supplies available
  • Trained personnel necessary to continue operation of the equipment and staff the oil spill removal organization for the first seven days of the response
	Appendix B

FIGURE E-3 - DOT / **PHMSA** CROSS-REFERENCE, CONTINUED

OPA 90 REQUIREMENTS (49 CFR 194)	LOCATION
List of Contacts	

• List of persons the Plan requires the operator to contact	Figure 3.1-1, Figure 3.1-3, Figure 3.1-4, Section 4.2
• Qualified individuals for the operator's areas of operation	Figure 1-2, Figure 3.1-3
• Applicable insurance representatives or surveyors for the operator's areas of operation	Figure 4.1-2
• Persons or organizations to notify for activation of response resources	Figure 3.1-1, Figure 3.1-3, Figure 3.1-4
Training Procedures	
• Description of training procedures and programs of the operations	Appendix A.2
Drill Procedures	
• Announced and unannounced drills	Appendix A.1

• Types of drills and their frequencies; for example:
  • Manned pipeline emergency procedures and qualified individual notification drills conducted quarterly
  • Drills involving emergency actions by assigned operating or maintenance personnel and notification of qualified individual on pipeline facilities which are normally unmanned, conducted quarterly
  • Shore-based spill management team (SMT) tabletop drills conducted yearly
  • Oil spill removal organization field equipment deployment drills conducted yearly
  • A drill that exercises entire response plan for each Response Zone, would be conducted at least once every three years
	Appendix A.1

Response Plan review and update procedures	
• Procedures to meet §194.121	Section 1.2
• Procedures to review plan after a worst case discharge and to evaluate and record the plan's effectiveness	Section 1.2, Section 8.3
Response zone appendices	
Each response zone appendix would provide the following information:	
• Name and telephone number of the qualified individual	Figure 1-2, Figure 3.1-3
• Notification procedures	Section 3

Spill detection and mitigation procedures	Section 2.1.1, Appendix D.3
• Name, address, and telephone number of oil spill response organization	Figure 3.1-4, Appendix B

FIGURE E-3 - DOT / **PHMSA** CROSS-REFERENCE, CONTINUED

OPA 90 REQUIREMENTS (49 CFR 194)	LOCATION

• Response activities and response resources including:
  • Equipment and supplies necessary to meet §194.115
  • Trained personnel necessary to sustain operation of the equipment and to staff the oil spill response organization and spill management team for the first seven days of the response
	Figure 3.1-3, Appendix A, Appendix B

• Names and telephone numbers of federal, state, and local agencies which the operator expects to assume pollution response responsibilities	Figure 3.1-4
• Worst case discharge volume	Appendix D
• Method used to determine the worst case discharge volume, with calculations	Appendix D.7

• A map that clearly shows:
  • Location of worst case discharge
  • Distance between each line section in the Response Zone:
  • Each potentially affected public drinking water intake, lake, river, and stream within a radius of five miles of the line section
  • Each potentially affected environmentally sensitive area within a radius of one mile of the line section
	Figure 1-3, Figure 1-5, Section 6.7, Section 6.8

• Piping diagram and plan-profile drawing of each line section; may be kept separate from the response plan if the location is identified	Figure 1-2
• 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	Appendix D.9, Figure D.9-1

• Meet 29 CFR 1910.1200 or 49 CFR 172.602	

FIGURE E-4 - OSHA CROSS-REFERENCE

EAP REQUIREMENTS (29 CFR 1910.38)	LOCATION
(a) Application. An employer must have an emergency action plan whenever an OSHA standard in this part requires one. The requirements in this section apply to each such emergency action plan.	
(b) Written and oral emergency action plans. An emergency action plan must be in writing, kept in the workplace, and available to employees for review. However, an employer with 10 or fewer employees may communicate the plan orally to employees.	
(c) Minimum elements of an emergency action plan. An emergency action plan must include at a minimum:	
(1) Procedures for reporting a fire or other emergency;	Section 2, Section 3
(2) Procedures for emergency evacuation, including type of evacuation and exit route assignments;	Section 2.6, Figure C-3
(3) Procedures to be followed by employees who remain to operate critical plant operations before they evacuate;	N/A
(4) Procedures to account for all employees after evacuation;	Section 2.6
(5) Procedures to be followed by employees performing rescue or medical duties; and	Section 2.3
(6) The name or job title of every employee who may be contacted by employees who need more information about the plan or an explanation of their duties under the plan.	Figure 3.1-3, Section 4
(d) Employee alarm system. An employer must have and maintain an employee alarm system. The employee alarm system must use a distinctive signal for each purpose and comply with the requirements in §1910.165.	Section 2.6.2
(e) Training. An employer must designate and train employees to assist in a safe and orderly evacuation of other employees.	Appendix A
(f) Review of emergency action plan. An employer must review the emergency action plan with each employee covered by the plan:	Appendix A.2
(1) When the plan is developed or the employee is assigned initially to a job;	Appendix A.2
(2) When the employee's responsibilities under the plan	Appendix A.2

change; and	
(3) When the plan is changed.	Appendix A.2

FIGURE E-4 - OSHA CROSS-REFERENCE, CONTINUED

ERP REQUIREMENTS (29 CFR 1910.120 [q] [2])	LOCATION
(q) Emergency response to hazardous substance releases. This paragraph covers employers whose employees are engaged in emergency response no matter where it occurs except that it does not cover employees engaged in operations specified in paragraphs (a)(1)(i) through (a)(1)(iv) of this section. Those emergency response organizations who have developed and implemented programs equivalent to this paragraph for handling releases of hazardous substances pursuant to section 303 of the Superfund Amendments and Reauthorization Act of 1986 (Emergency Planning and Community Right-to-Know Act of 1986, 42 U.S.C. 11003) shall be deemed to have met the requirements of this paragraph.	
(1) Emergency response plan. An emergency response plan shall be developed and implemented to handle anticipated emergencies prior to the commencement of emergency response operations. The plan shall be in writing and available for inspection and copying by employees, their representatives and OSHA personnel. Employers who will evacuate their employees from the danger area when an emergency occurs, and who do not permit any of their employees to assist in handling the emergency, are exempt from the requirements of this paragraph if they provide an emergency action plan in accordance with 29 CFR 1910.38.	
(2) Elements of an emergency response plan. The employer shall develop an emergency response plan for emergencies which shall address, as a minimum, the following to the extent that they are not addressed elsewhere:	
(i) Pre-emergency planning and coordination with outside parties.	Section 3, Appendix C, Appendix D
(ii) Personnel roles, lines of authority, training, and communication.	Section 3, Section 4, Section 7.1.6, Appendix A.2
(iii) Emergency recognition and prevention.	Appendix C, Appendix D.3
(iv) Safe distances and places of refuge.	Section 2.6
(v) Site security and control.	Section 5.6, Section 7.2
(vi) Evacuation routes and procedures.	Section 2.6, Figure C-

	3
(vii) Decontamination.	Section 5.4
(viii) Emergency medical treatment and first aid.	Section 2.3
(ix) Emergency alerting and response procedures.	Section 2
(x) Critique of response and follow-up.	Section 8
(xi) PPE and emergency equipment.	Section 7.1.1, Figure 7.1-1
(xii) Emergency response organizations may use the local emergency response plan or the state emergency response plan or both, as part of their emergency response plan to avoid duplication. Those items of the emergency response plan that are being properly addressed by the SARA Title III plans may be substituted into their emergency plan or otherwise kept together for the employer and employee's use.	

FIGURE E-5 - EPA RESPONSE PLAN COVER SHEET

Owner/ operator of facility:	BP Pipeline U.S. and Logistics
Owner / operator address / Phone (street address or route):	150 W. Warrenville Rd Naperville , IL 60563 (630) 420-5519 (Fax) (630) 536-2161 (Phone)
Facility name:	Carteret
Facility address (street address or route):	760 Roosevelt Avenue
City, state, and U.S. zip code	Carteret, NJ 07008
Facility mailing address:	As above
Facility phone number.:	(732) 541-5131
(b) (7)(F) [redacted]	
Facility Acres:	
Facility Start Up Date:	1923
Dun & Bradstreet number:	1544332
(b) (7)(F) [redacted]	

(b) (7)(F) [redacted]

Name of Protected Waterway or Environmentally Sensitive Area:	Arthur Kill - tidally influenced
Number of Underground Storage Tanks:	0
Total Underground Storage Tanks (gallons):	0
Total Storage of Drums (gallons):	0
Total Storage of Transformers that Contain Oil (gallons):	0
Number of Surface Impoundments:	0
Total Storage of Surface Inmpoundments (gallons):	0
Facility distance to navigable water; mark the appropriate line.	
0-1/4 ☑ 1/4-1/2 mile ☐ 1/2 - 1 mile ☐ > 1 mile ☐	

FIGURE E-5 - EPA RESPONSE PLAN COVER SHEET CONTINUED

APPLICABILITY OF SUBSTANTIAL HARM CRITERIA
Does the facility transfer oil over water to or from vessels and does the facility have a total oil storage capacity greater than or equal to 42,000 gallons?
YES ☑ NO ☐
Does the facility have a total oil storage capacity greater than or equal to one million gallons and, within any storage area, does the facility lack secondary containment that is sufficiently large to contain the capacity of the largest aboveground oil storage tank plus sufficient freeboard to allow for precipitation?
YES ☐ NO ☑
Does the facility have a total oil storage capacity greater than or equal to one million gallons and is the facility located at a distance (as calculated using the appropriate formula in or a comparable formula) such that a discharge from the facility could cause injury to fish and wildlife and sensitive environments?
YES ☑ NO ☐
Does the facility have a total oil storage capacity greater than or equal to one million gallons and is the facility located at a distance (using the appropriate formula in or a comparable formula) such that a discharge from the facility would shut down a drinking water intake?
YES ☑ NO ☐
Does the facility have a total oil storage capacity greater than or equal to one million gallons and has the facility experienced a reportable oil spill in an amount greater than or equal to 10,000 gallons within the last five years?
YES ☐ NO ☑
CERTIFICATION
I certify under penalty of law that I have personally examined and am familiar with the

information submitted in this document and that based on my inquiry of those individuals responsible for obtaining information, I believe that the submitted information is true, accurate, and complete.	
Kept on file at Facility Signature:	Date: On File
Name: David Aparisio	Title: Terminal Manager

APPENDIX F Last Revised: March 2009

ACRONYMS AND DEFINITIONS

F.1 ACRONYMS

ACP	Area Contingency Plan
AFFF	Aqueous Film Forming Foam
AR-AFFF	Alcohol Resistant Aqueous Film Forming Foam
ASTM	American Society of Testing Materials
BBL	Barrel(s)
BLM	Bureau of Land Management (USDOI)
BPD	Barrels Per Day
BPH	Barrels Per Hour
CERCLA	Comprehensive Environmental Response, Compensation & Liability Act of 1980, as amended
CFR	Code of Federal Regulations
CO_2	Carbon Dioxide
COTP	Captain of the Port (USCG)
CRZ	Contamination Reduction Zone
CWA	Clean Water Act of 1977 (Federal)
EAP	Emergency Action Plan
EMS	Emergency Medical Services
EOC	Emergency Operations Center
EPA	U.S. Environmental Protection Agency
EPCRA	Emergency Planning and Community Right-to-Know Act
ERAP	Emergency Response Action Plan
ERP	Emergency Response Plan
ERT	Emergency Response Team
FAA	Federal Aviation Administration
FEMA	Federal Emergency Management Agency
FOSC	Federal On-Scene Coordinator
FRP	Facility Response Plan
FRT	Facility Response Team
FWPCA	Federal Water Pollution Control Act of 1972
GIS	Geographic Information System
GPM	Gallons Per Minute
HAZMAT	Hazardous Materials
HMIS	Hazardous Material Information System
IC	Incident Commander
ICS	Incident Command System

JIC	Joint Information Center
LEL	Lower Explosive Limit

F.1 ACRONYMS, CONTINUED

LEPC	Local Emergency Planning Committee
LEPD	Local Emergency Planning District
LNG	Liquid Natural Gas
LPG	Liquefied Petroleum Gas
MSDS	Material Safety Data Sheets
MTR	Marine Transportation Related
N/A	Not Applicable
NCP	National Oil and Hazardous Substances Pollution Contingency Plan
NIIMS	National Interagency Incident Management System
NM	Nautical Miles
NOAA	National Oceanic and Atmospheric Administration
NRC	National Response Center
NRDA	National Resource Damage Assessment
NRT	National Response Team
OBA	Oxygen Breathing Apparatus
OPA 90	Oil Pollution Act of 1990
OSC	On-Scene Coordinator/Commander
OSHA	Occupational Safety and Health Administration (USDL)
PPE	Personal Protective Equipment
PREP	(National) Preparedness for Response Exercise Program
PSM	Process Safety Management
QI	Qualified Individual
RCRA	Resource Conservation and Recovery Act of 1976
RMP	Risk Management Program
RQ	Reportable Quantity
RSPA	Research and Special Programs Administration (DOT)
SARA	Superfund Amendments and Reauthorization Act
SCADA	Supervisory Control and Data Acquisition (System)
SCBA	Self Contained Breathing Apparatus
SDWA	Safe Drinking Water Act of 1986
SERC	State Emergency Response Commission
SETS	Safety Environment and Training Services

SI	Surface Impoundment
SIC	Standard Industrial Classification (Code)
EMT	Emergency Management Team
SOSC	State On-Scene Coordinator
SPCC	Spill Prevention, Control, and Countermeasures (Plan)

F.1 ACRONYMS, CONTINUED

SSC	Scientific Support Coordinator (NOAA)
UCS	Unified Command System
UEL	Upper Explosive Limit
USACOE	U.S. Army Corps of Engineers
USCG	U.S. Coast Guard
USDOD	U.S. Department of Defense
USDL	U.S. Department of Labor
USDOE	U.S. Department of Energy
USDOI	U.S. Department of the Interior
USDOJ	U.S. Department of Justice
USDOT	U.S. Department of Transportation
USFWS	U.S. Fish and Wildlife Service (USDOI)
USGS	U.S. Geological Survey (USDOI)

F.2 DEFINITIONS

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

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

Average Most Probable Discharge **(USCG)**
A discharge of the lesser of 50 barrels (2100 gallons) or one percent of the volume of the worst case discharge.

Barrel

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

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

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

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

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

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

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

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

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

F.2 DEFINITIONS, CONTINUED

Command Post
A site located at a safe distance from the spill site where response decisions are made, equipment and manpower deployed, and communications handled. The Incident Commander and the On-Scene Coordinators may direct the on-scene response from this location.

Communication Equipment
Equipment that will be utilized during response operations to maintain communication between employees, contractors, federal/state/local agencies.

Containment Boom
A flotation/freeboard device, made with a skirt/curtain, longitudinal strength member, and ballast unit/weight designed to entrap and contain the product for recovery.

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

Contingency Plan

A document used by: (1) federal, state, and local agencies to guide planning and response procedures regarding spill of oil, hazardous substances, or other emergencies; (2) a document used by industry as a response plan to spills of oil, hazardous substances, or other emergencies occurring upon their vessels or at their facilities.

Contract or Other Approved Means
Includes:

- A written contractual agreement with a response contractor. The agreement should identify and ensure the availability of the specified personnel and equipment described under U.S.C.G. Regulations within stipulated response times in the specified geographic areas
- Certification by the facility owner or operator that the specified personnel and equipment described under USCG Regulations are owned, operated, or under the direct control of the facility owner or operator, and are available within stipulated times in the specified geographic areas
- Active membership in a local or regional oil spill removal organization that has identified specified personnel and equipment described under USCG Regulations that are available to respond to a discharge within stipulated times in the specified geographic areas
- A document which:
    - Identifies the personnel, equipment, services, capable of being provided by the response contractor within stipulated response times in specified geographic areas
    - Sets out the parties' acknowledgment that the response contractor intends to commit the resources in the event of a response
    - Permits the Coast Guard to verify the availability of the response resources identified through tests, inspections, drills
    - Is incorporated by reference in the Response Plan
- For a facility that could reasonably be expected to cause substantial harm to the environment, with the consent of the response contractor or oil spill removal organization, the identification of a response contractor or oil spill removal organization with specified equipment and personnel which are available within stipulated response times in specific geographic areas.

F.2 DEFINITIONS, CONTINUED

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

Dispersants
Those chemical agents that emulsify, disperse, or solublize oil into the water column or promote the surface spreading of oil slicks to facilitate dispersal of the oil into the water column.

Diversion Boom

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

Environmentally Sensitive Areas
Streams and water bodies, aquifer recharge zones, springs, wetlands, agricultural areas, bird rookeries, endangered or threatened species (flora and fauna) habitat, wildlife preserves or conservation areas, parks, beaches, dunes, or any other area protected or managed for its natural resource value.

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

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

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

Federal Fund
The oil spill liability trust fund established under OPA.

First Responders, First Response Agency
A public health or safety agency (i.e., fire service or police department) charged with responding to a spill during the emergency phase and alleviating immediate danger to human life, health, safety, or property.

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

F.2 DEFINITIONS, CONTINUED

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

Foam
A blanket of bubbles that extinguishes fire mainly by smothering. The blanket prevents

flammable vapors from leaving the surface of the fire and prevents oxygen from reaching the fuel. The water in the foam also has a cooling effect.

Hazardous Material
Any nonradioactive solid, liquid, or gaseous substance which, when uncontrolled, may be harmful to humans, animals, or the environment. Including but not limited to substances otherwise defined as hazardous wastes, dangerous wastes, extremely hazardous wastes, oil, or pollutants.

Hazardous Substance
Any substance designed as such by the Administrator of EPA pursuant to the Comprehensive Environmental Response, Compensation, and Liability Act; regulated pursuant to Section 311 of the Federal Water Pollution Control Act.

Hazardous Waste
Any solid waste identified or listed as a hazardous waste by the Administrator of the EPA pursuant to the federal Solid Waste Disposal Act, as amended by the Resources Conservation and Recovery Act (RCRA), 42 U.S.C., Section 6901, et seq as amended. The EPA Administrator has identified the characteristics of hazardous wastes and listed certain wastes as hazardous in Title 40 of the Code of Federal Regulations, Part 261, Subparts C and D respectively.

Higher Volume Port Area
Ports of:

- Boston, MA
- New York, NY
- Delaware Bay and River to Philadelphia, PA
- St. Croix, VI
- Pascagoula, MS
- Mississippi River from Southwest Pass, LA to Baton Rouge, LA
- Louisiana Offshore Oil Port (LOOP), LA
- Lake Charles, LA
- Sabine-Nachez River, TX
- Galveston Bay and Houston Ship Channel, TX
- Corpus Christi, TX
- Los Angeles/Long Beach Harbor, CA
- San Francisco Bay, San Pablo Bay, Carquinez Strait, Suisun Bay to Antioch, CA
- Straits of Juan de Fuca and Puget Sound, WA
- Prince William Sound, AK

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

F.2 DEFINITIONS, CONTINUED

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

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

Incident Commander (IC)
The one individual in charge at any given time of an incident. The Incident Commander will be responsible for establishing a unified command with all on-scene coordinators.

Incident Command System
A method by which the response to an extraordinary event, including a spill, is categorized into functional components and responsibility for each component assigned to the appropriate individual or agency.

Interim Storage Site
A site used to temporarily store recovered oil or oily waste until the recovered oil or oily waste is disposed of at a permanent disposal site. Interim storage sites include trucks, barges, and other vehicles, used to store waste until the transport begins.

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

Lead Federal Agency
The agency which coordinates the federal response to incidents on navigable waters. The lead Federal agencies are:

- **U. S. Coast Guard (USCG):** Oil and chemically hazardous materials incidents on navigable waters
- **Environmental Protection Agency (EPA):** Oil and chemically hazardous materials incidents on most inland waters and in the inland zone

Lead State Agency
The agency which coordinates state support to Federal and/or Local governments or assumes the lead in the absence of a Federal spill response.

Lower Flammable Limit
Minimum flammable concentration of a particular gas in the air.

Marine Transportation-Related Facility (MTR Facility)
An onshore facility, including piping and any structure used to transfer oil to or from a vessel, subject to regulation under 33 CFR Part 154 and any deepwater port subject to regulation under 33 CFR Part 150.

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

F.2 DEFINITIONS, CONTINUED

Maximum Most Probable Discharge (USCG)

A discharge of the lesser of 2,500 barrels or ten percent of the volume of a worst case discharge.

Medium Discharge **(EPA)**
Same as maximum most probable discharge.

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

Nearshore Area
The area extending seaward 12 miles from the boundary lines defined in 46 CFR Part 7, except in the Gulf of Mexico. In the Gulf of Mexico, it means the area extending seaward 12 miles from the line of demarcation (COLREG) lines) defined in '80.740 - 80.850 of Title 33 of the CFR.

Non-Persistent or Group I Oil
A petroleum-based oil that, at the time of shipment, consists of hydrocarbon fractions:

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

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

Offshore Area
The area beyond 12 nautical miles measured from the boundary lines defined in 46 CFR Part 7 extending seaward to 50 nautical miles, except in the Gulf of Mexico. In the Gulf of Mexico it is the area beyond 12 nautical miles of the line of demarcation (COLREG lines) defined in '80-740 - 80.850 of Title 33 of the CFR extending seaward to 50 nautical miles.

Oil or Oils
Naturally occurring liquid hydrocarbons at atmospheric temperature and pressure coming from the earth, including condensate and natural gasoline, and any fractionation thereof, including, but not limited to, crude oil, petroleum gasoline, fuel oil, diesel oil, oil sludge, oil refuse, and oil mixed with wastes other than dredged spoil. Oil does not include any substance listed in Table 302.4 of 40 CFR Part 302 adopted August 14, 1989, under Section 101(14) of the Federal Comprehensive Environmental Response, Compensation, and Liability Act of 1980, as amended by P.L. 99-499.

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

Operating Area
The rivers and canals, inland, nearshore, Great Lakes, or offshore geographic location(s) in which a facility is handling, storing, or transporting oil.

Operating Environment
Rivers and canals, inland, Great Lakes, or ocean. These terms are used to define the conditions in which response equipment is designed to function.

F.2 DEFINITIONS, CONTINUED

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

Owner or Operator
Any person, individual, partnership, corporation, association, governmental unit, or public or private organization of any character.

Persistent Oil
A petroleum-based oil that does not meet the distillation criteria for a non-persistent oil. For the purposes of this Appendix, persistent oils are further classified based on specific gravity as follows:

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

Primary Response Contractor(s)
An individual, company, or cooperative that has contracted directly with the plan holder to provide equipment and/or personnel for the containment or cleanup of spilled oil.

Qualified Individual(s)
An English-speaking representative(s) of the facility identified in the plan, located in the United States, available on a 24-hour basis, familiar with implementation of the facility response plan, and trained in his or her responsibilities under the plan. This person must have full written authority to implement the facility's response plan. This includes:

- Activating and engaging in contracting with identified oil spill removal organization(s)
- Acting as a liaison with the predesignated of Federal On-Scene Coordinator (FOCS)
- Obligating, either directly or through prearranged contracts, funds required to carry out all necessary or directed response activities

Regional Response Team
The Federal Response Organization (consisting of representatives from selected Federal and State agencies) which acts as a regional body responsible for planning and preparedness before an oil spill occurs and providing advice to the FOSC in the event of a major or substantial spill.

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

Responsible Party
Any person, owner/operator, or facility that has control over an oil or hazardous substance immediately before entry of the oil or hazardous substance into the atmosphere or in or upon

the water, surface, or subsurface land of the state.

F.2 DEFINITIONS, CONTINUED

Rivers and Canals
A body of water confined within the inland area that has a projected depth of 12 feet or less, including the Intracoastal Waterway and other waterways artificially created for navigation.

Skimmers
Mechanical devices used to skim the surface of the water and recover floating oil. Skimmers fall into four basic categories (suction heads, floating weirs, oleophilic surface units, and hydrodynamic devices) which vary in efficiency depending on the type of oil and size of spill.

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

Small Discharge (EPA)
Same as average most probable discharge.

Sorbents
Materials ranging from natural products to synthetic polymeric foams placed in confined areas to soak up small quantities of oil. Sorbents are very effective in protecting walkways, boat decks, working areas, and previously uncontaminated or cleaned areas.

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

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

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

State Emergency Response Commission (SERC)
A group of officials appointed by the Governor to implement the provisions of Title III of the Federal Superfund Amendments and Reauthorization Act of 1986 (SARA). The SERC approves the State Oil and Hazardous Substance Discharge Prevention and Contingency Plan and Local Emergency Response Plans.

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

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

Tornado Warning
A tornado has been sighted.

Tornado Watch
Conditions are favorable for tornados to form.

F.2 DEFINITIONS, CONTINUED

Unified Command
The method by which local, state, and federal agencies will work with the Incident Commander to:

- Determine their roles and responsibilities for a given incident
- Determine their overall objectives for management of an incident
- Select a strategy to achieve agreed upon objectives
- Deploy resources to achieve agreed-upon objectives

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

Waste
Oil or contaminated soil, debris, and other substances removed from coastal waters and adjacent waters, shorelines, estuaries, tidal flats, beaches, or marshes in response to an unauthorized discharge. Waste means any solid, liquid, or other material intended to be disposed of or discarded and generated as a result of an unauthorized discharge of oil. Waste does not include substances intended to be recycled if they are in fact recycled within 90 days of their generation or if they are brought to a recycling facility within that time.

Wildlife Rescue
Efforts made in conjunction with federal and state agencies to retrieve, clean, and rehabilitate birds and wildlife affected by an oil spill.

APPENDIX G Last Revised: August 2010

ADDITIONAL INFORMATION

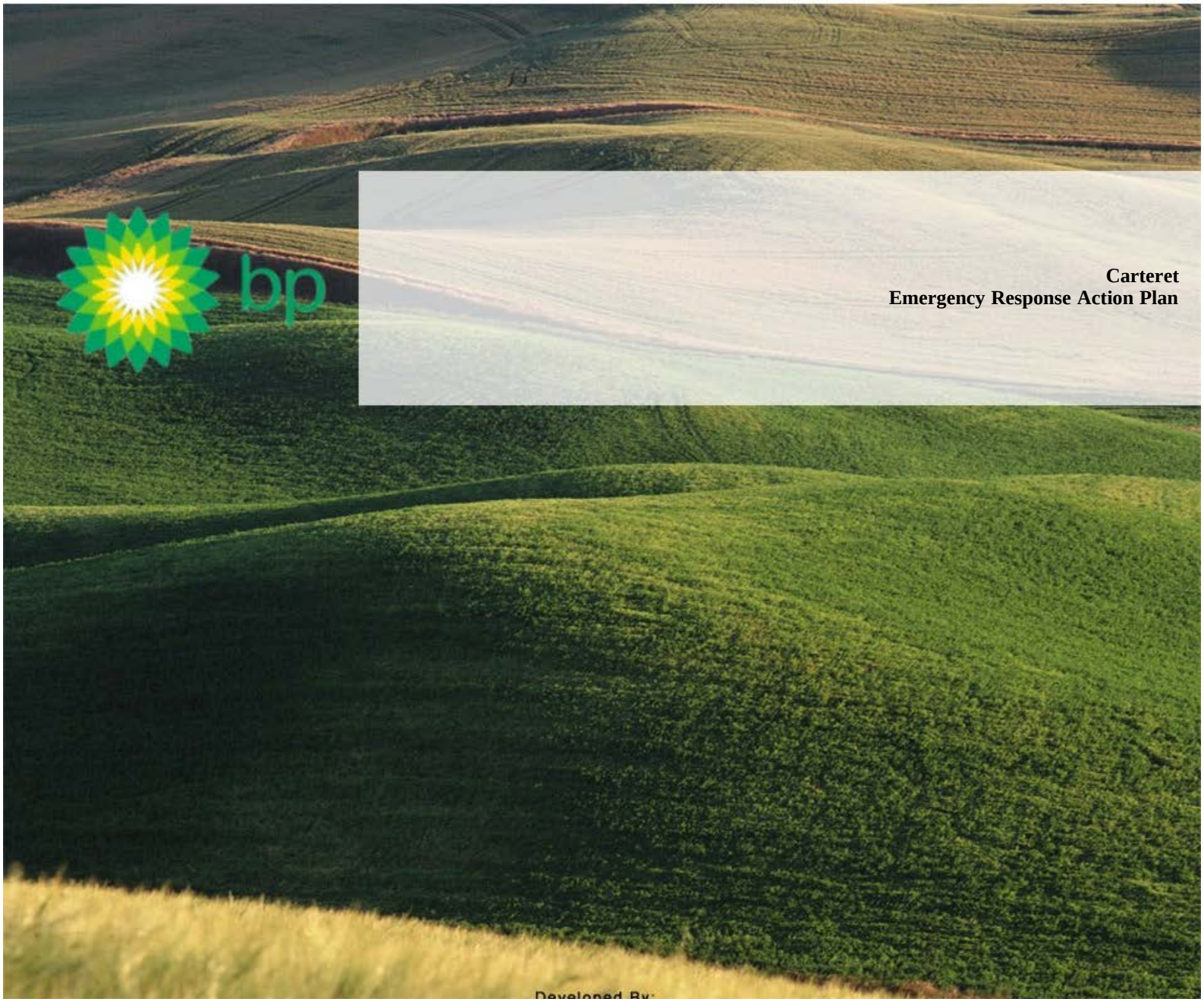
- Appointment and Authorization of Qualified Individuals
- HURRICANE RECOVERY PLAN
- Hazardous Waste Contingency Plan - Terminals
- Ethanol Spill Response Guidance
- Ethanol: Safety Training Slidepack

APPENDIX H Last Revised: July 2008

SITE SPECIFIC FORMS


bp
Carteret
Emergency Response Action Plan
Developed by:


bp
Carteret
Emergency Response Action Plan


bp
Carteret
Emergency Response Action Plan
Developed By:

1610 Woodstead Court #355 • The Woodlands, Texas 77380 USA • Tel: 281-955-9600 • Fax: 281-955-0369 • info@trpcorp.com • www.emergency-response-planning.com

Carteret

Emergency Response Action Plan

760 Roosevelt Avenue
Carteret, NJ 07008

Developed by:

1610 Woodstead Court, #355 · The Woodlands, Texas 77380 USA · Tel: 281-955-9600 · Fax : 281-955-0369 · info@trpcorp.com · www.emergency-response-planning.com

EMERGENCY RESPONSE ACTION PLAN

Last Revised: 11/15/2012

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EMERGENCY RESPONSE ACTION PLAN

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1.0 INTRODUCTION

1.1 Purpose / Scope of Plan

This Emergency Response Action Plan (ERAP) provides guidelines to assist in managing an emergency. The primary goal of this Plan is to provide tools to enable an efficient, coordinated, and effective response to emergencies. For more information on this plan, contact your supervisor, Regional Emergency Response and Crisis Management Coordinator.

The ERAP is not meant to replace common sense or actions not specifically described herein. Responders should continually evaluate the effectiveness of actions called for in this Plan and make the appropriate adjustments based on past experience and training.

This ERAP contains tactical response plans that identify site-specific potential response strategies. Response strategies, equipment and manpower requirements and site conditions are based on conditions that were present during site assessments. Actual conditions at the time of a response may vary significantly and may necessitate the need for a different strategy and/or

equipment requirements. The strategies and equipment lists contained in this plan should be used as guidelines only.

This document is intended to satisfy the requirements of 29 CFR 1910.38(a)(2) and 1910.120(l)(2) (OSHA Emergency Response Plan and Emergency Action Plan) and 40 CFR Part 112.20 (EPA Emergency Response Action Plan). Cross references for these regulations are located in **APPENDIX E** of the Facility Response Plan.

1.2 Plan Review and Updating Procedures

The ERAP will be reviewed and modified as appropriate to address new information.

Plan revisions will be numbered sequentially and entered on the Record of Changes Form. The change numbers, date, and description of change will also be entered on the form. These changes are then to be distributed to all plan holders on the Distribution List.

1.3 Facility Description

The Carteret Terminal (hereinafter referred to as "Facility") is owned and operated by BP Products North America, Inc., U.S. Pipelines and Logistics. This is a complex facility and subject to EPA, US Coast Guard, and US Department of Transportation Pipeline and Hazardous Materials Safety Administration (USDOT PHMSA) regulatory requirements, as well as the State of New Jersey Discharge Prevention, Containment and Countermeasure (DPCC); Discharge Cleanup and Removal (DCR) regulations for major facilities (i.e., facilities with a combined storage capacity for 200,000 gallons or more for petroleum or petroleum products). This complex facility's SIC code is 1571 and NAICS code is 424710. The Facility is located in a mixed use (i.e., residential, commercial, and industrial) area of Carteret, New Jersey. The Facility is divided into two sections: 1) the upper, western portion (the Upper Facility) that includes the terminal offices, truck loading rack, and petroleum storage and 2) the lower, eastern portion (the Lower Facility or BP Dock) that includes the Facility-owned marine transfer facility. The Upper Facility is bordered by Peter J. Sica Industrial Highway to the northeast; New Jersey Turnpike entrance ramps to the northwest; Roosevelt Avenue to the west; commercial/industrial businesses to the south; and residences along Bristol Station Court to the southeast. The Lower Facility (the BP Dock) is on the eastern shore of the Arthur Kill, near the mouth of the Rahway River. The Lower Facility and part of the Upper Facility are located on a tidal marsh. The pipeline connecting the Upper and Lower Facilities is located adjacent to a tidal marsh.

The Facility is a refined petroleum product storage, blending and transfer terminal. Operations at the Facility consist entirely of the receipt, storage, blending, and distribution of denatured ethanol and refined petroleum products. These products are stored and blended in large, aboveground storage tanks, each of which is surrounded by an earthen dike. The Facility serves as a petroleum distribution center for peripheral retail gasoline service stations, commercial and industrial sales customers, and jobber customers. The Facility has a total of 29 aboveground storage tanks (ASTs), including 17 large (i.e., field-constructed) ASTs (b) (7)(F) [redacted] (bbl). In addition, there are six (6) additive tanks, five (5) slop or tank bottoms tanks (including the slop tank at the BP Dock), and one (1) fire pump fuel tank, as well as one (1) AST for well purge water from groundwater monitoring wells. The large aboveground bulk petroleum product storage tanks have shell capacities ranging from approximately (b) (7)(F) [redacted] gallons). There is also one (1) drum storage areas: the storage shed located northwest of Tank

96 for hazardous materials. The Facility is equipped with one (1) tanker truck loading/unloading rack that includes the additive unloading area, and three (3) pump out / pump back areas.

There are no ASTs that are closed or out of service, but tanks that are not in use or decommissioned are marked permanently closed while tanks that are temporarily not in use are marked out of service. There are no buried tanks/bulk containers (i.e., underground storage tank, UST) at the Facility. The Facility receives denatured ethanol, gasoline, and distillates via marine vessels (i.e., ships and barges), pipelines, and trucks. Additives are typically received via tanker truck and drums and other portable container deliveries are received via truck. The Facility ships products out via truck, marine vessels, and pipeline. The facility conducts marine transfers of products to and from storage at the BP Dock located on Arthur Kill. In addition, marine vessels are fueled at the BP Dock.

The Terminal Truck Loading/Unloading Rack (the Loading Rack) has four (4) bays with a total of 15 bottom-loading positions and four (4) top loading positions. Up to four (4) trucks can be loaded simultaneously. Maximum loading rates at the truck racks are 600 gallons per minute (gpm). Tanker trucks and trailers are equipped with multiple compartments and each compartment has a maximum capacity of 4,000 gallons. The maximum overall truck and trailer capacity is 9,000 gallons. Containment at the Loading Rack is adequate to contain the maximum capacity of any single compartment of a tanker truck or trailer. Approved tanker truck drivers have Terminal access 24 hours per day, seven days per week and must have a Scully overfill protection system and equipment for vapor recovery as a condition of being allowed access for loading. Truck loading permissions are managed in the Terminal Automated System.

FIGURE 1-1 - FACILITY AREA MAP

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2.0 RESPONSE STEPS

Figure 2-1 - **Initial Response Action Guidelines**

	PERSON TAKING	DATE/TIME

RESPONSE ACTION	ACTION (INITIALS)	ACTION TAKEN
First Responder/ Tactical Response Team (TRT)		
If in Impacted/source area, leave immediately (life safety first). Activate necessary alarms or otherwise alert asset personnel and workers.		
Pipeline Response in Right of Way (ROW): From safe distance, Identify character, exact source, amount, and extent of the release and other necessary items needed for notifications. Control source of Incident, if safe to do so (i.e. trained per USPL HAZWOPER Policy, qualified and properly PPE equipped). Otherwise, leave the area immediately.		
If fixed facility: Evacuate Personnel from facility, if necessary • To safe muster point • Conduct personal accountability (Roll call). Identify and control source of Incident, if safe to do so (i.e. trained per USPL HAZWOPER Policy, qualified and properly PPE equipped). Otherwise, leave the area immediately.		

Initiate Notifications IMMEDIATELY or within 15 minutes of discovering a discharge or release.
 	
• Call 911 (fire, Police, EMT)
• NRC (if potential water impact) **(800-424-8802)**
• OSRO/Response Contractor
  • Better to Over Respond - call all OSROs
  • Refer to **FIGURE 3-4**
• Qualified Individual (Team Lead/Terminal Manager)
• BP Notification Center **(800-321-8642)**		

If safe to do so, work with Fire Department/trained responders to: Identify hazards: • Establish hazard control, if necessary.* The area immediately surrounding a spill, leak, or discharge of hazardous material(s) which extends far enough to prevent adverse health and safety effects from the release[1].		

Verify evacuation status: • Verify all Personnel have evacuated from the Hazard Control Area to pre-designated assembly areas. If necessary, communicate need to potentially evacuate personnel at adjacent properties/locations. **Note 1:** See USPL Hazardous Waste Operations and Emergency Response (Hazwoper) Policy in DRM. The DOT Emergency Response Guidebook may be used to initially delineate the Hot Zone, or Exclusion Zone. Hot zones cannot be reduced until confirmed by air monitoring.		

Figure 2-1 - Initial Response Action Guidelines, continued

RESPONSE ACTION	PERSON TAKING ACTION (INITIALS)	DATE/TIME ACTION TAKEN
First Responder/ Tactical Response Team (TRT)		
*If safe to do so, shut down potential ignition sources, including motors, electrical pumps, electrical power, boats, vehicles, hot work, etc.		
Fire alarm pull stations are located as follows: 1) Operations Control Room 2) End of hallway adjacent to exit door leading from main administrative office to the warehouse 3) Inside right of external entrance/exit of warehouse door to transport drivers' rest room and another within the maintenance workshop inside the warehouse 4) Within each of four gasoline loading rack kiosks 5) Within the marine dock house and four total on the marine dock main catwalk and the two barge loading cells.		
Incident Commander (Operations Team Leader/Terminal Manager)		
Ensure evacuation accountability (roll call) procedures implemented and confirm all personnel are accounted.		
Ensure notifications have been initiated/complete.		
Activate Tactical Response Team (TRT) and set up response organization.		
Assess the oil spill and/or Incident Potential . Determine if initial source control or containment has been established.		
Assess possible hazards to human health and the environment (including outside the fence line if at a fixed facility). Ensure Site Characterization and Monitoring is initiated near		

release site.		
If necessary: Initiate spill tracking and surveillance operations by activating surveillance aircraft and/or watercraft. Estimate trajectory of spill. Send photographer/videographer, if safe.		
Establish initial Incident Objectives and Priorities.		
Determine location of Incident Command Post (ICP) facilities and support. Assess operational requirements and resource requirements.		
Ensure ICS 201- Initial Incident Briefing Document is complete and distributed to Unified Command, IMT (if activated) and internal stakeholders.		
Ensure compliance with all safety practices and procedures. Ensure initial safety briefings with TRT and field responders is conducted		
If no response is warranted, ensure that appropriate regulatory notifications have been made and no further action is taken.		
DOCUMENT the incident • Ensure all responders capture response actions in personal log (ICS 214/notebook) • Collect all incident documentation and file on-site in training files.		

Figure 2-1 - Initial Response Action Guidelines, continued

RESPONSE ACTION	PERSON TAKING ACTION (INITIALS)	DATE/TIME ACTION TAKEN
Environmental Unit Leader (Environmental Coordinator)		
Notify appropriate agencies (refer to **FIGURE 3-4**) • National Response Center **(800-424-8802)** • State Emergency Response Commission (SERC) • Local Emergency Planning Committee (LEPC), if applicable		
Ensure HSSE Manager has been notified of Incident.		
Initiate environmental monitoring and waste disposal coordination per Federal/State/Local requirements.		
Site Safety Officer (Safety Coordinator or asset employee)		
Obtain incident brief from Incident Commander.		

Initiate incident safety hazard analysis.		
Complete incident specific Site Safety Plan.		
Incident Management Team (as appropriate to manage the incident)		
Implement all aspects of the Incident Command System (ICS) response framework.		
Initial Incident Command Post (ICP) will be designated by TRT. Consider secondary ICP accommodations due to incident size.		
Obtain ICS 201 from TRT. IMT IC will brief arriving IMT members and build response team and Unified Command (UC).		
Establish Communications Network.		
Prepare Strategic Objectives and Response Priorities and communicate to all responders.		
Set up information center. (Situation Unit Leader).		
Obtain updated spill trajectory.		
Initiate documentation procedures. Document all response actions taken, including notifications, agency/media meetings, equipment and personnel mobilization and deployment, and are impacted.		
Assist in completion of regulatory agency notifications, if needed.		
Identify environmentally sensitive areas at risk and recommended protection based on trajectory. • Utilize Near-shore Response Guides, Technical Spill Consultants, USF&WS, local agency representatives.		
Prepare an initial Incident Action Plan for the UC for the next operational period (NOP).		
Initiate development of Site Incident Specific Response Plans in anticipation of Unified Command request. • Waste management • Demobilization • Traffic (vessel, road, rail)- as necessary • Medical plan • Resource Management • Etc.		
Begin preparations for media relations.		

2.1 Spill Response Action Checklist

SPECIFIC RESPONSE ACTIONS	COMMENT

Line Break or Leak	
Shut down source/pumping equipment.	
Close upstream and downstream valves.	
Utilize Combustible Gas Indicator, O_2 meter, proper colorimetric indicator and other air sampling measurements (as applicable) to assure that areas are safe to enter for continued response operations.	
Mitigate spreading of the product as the situation demands. Potential containment strategies include: • Deployment of boom (Refer to the tactical sites in **SECTION 6** of the Facility Response Plan and Geographic Response Plan [GRP] from the ACP for potential strategies); • Diking, trenching, and/or diversion; • Spreading sorbent material over the spill; and • Prevent the spill from entering water to the greatest extent possible.	
Determine the direction and expected duration of spill movement. Refer to **SECTION 2.11.1**.	
Drain the line section, as the situation demands.	
Request local authorities to establish scene security and traffic control in the area, as the situation demands.	
Make all necessary repairs.	
Return the line/rack to service when repairs are complete.	
Clean up spilled product to eliminate any possible environmental problems. Be alert for underground cables.	
If the spill escapes the containment area, review the location of socio-economic and environmentally sensitive areas identified in **SECTION 9.0**. Determine which of these may be threatened by the spill and direct the response operation to these locations based on information in the tactical sites in **SECTION 6** of the Facility Response Plan and booming strategies in GRP. Initiate protection and recovery actions.	
Inform local utilities, telephone company, railway, etc., as necessary.	
Complete follow-up and written reporting, as the situation demands.	
Storage Tank Leak	
Shut down all tank product movement operations and isolate the tank.	
Initiate Confined Space Entry procedures, as applicable.	
Insure that the containment area drainage valve(s) is closed.	
If leak is near tank bottom, create and maintain a ‘water	

bottom' to suspend the discharge of product.	
Utilize Combustible Gas Indicator, O_2 meter, proper colorimetric indicator and other air sampling measurements (as applicable) to assure that areas are safe to enter for continued response operations.	
Block drainage of spilled material from traveling off-site.	
Stop all traffic in hazardous area (inside and outside of property boundaries), as the situation demands.	
Remove product from containment (at a sump or in a low area) with an explosion proof pump, oil skimmer, and/or vacuum truck w/skimmer attachments.	
If applicable, process remaining product through a separator system.	

2.1 Spill Response Action Checklist, Continued

SPECIFIC RESPONSE ACTIONS	COMMENT
Storage Tank Leak, Continued	
Determine the direction and expected duration of spill movement.	
Request that local authorities establish scene security and traffic control in the area, as necessary.	
Empty tank as soon as possible.	
Make all necessary repairs. Return the line/tank to service when repairs and integrity testing are completed.	
Clean up product spill to eliminate any possible environmental problems. Be alert for underground cables, conduits, etc.	
If necessary, call an approved waste removal company to handle the remaining sludge and residue from the containment area.	
If the spill escapes the containment area, review the location of socioeconomic and environmentally sensitive areas identified in **SECTION 9.0** and the ACP. Determine which of these may be threatened by the spill and direct the response operationto these locations based on information in the tactical sites in **SECTION 6** of the Facility Response Plan and booming strategies in Geographic Response Plan (in the ACP). Determine which of these may be threatened by the spill and direct the response to these locations. Initiate protection and recovery actions.	
Inform local operators such as utilities, telephone company, railway, as necessary.	
Complete follow-up and written reporting, as the situation demands.	

Leak or Spill at Truck Rack	
Evacuate personnel from the truck rack area, as the situation demands.	
Shut down all loading operations, pumps motors and loading valves.	
Guard against all sources of ignition.	
Secure the area. Stop all traffic from entering rack or hazardous area.	
If a line leak is involved, close off riser valves and/or tank valves.	
Clean area with sorbent material, flush (with water) all remaining product into a separator system.	
Resume truck loading operations as directed by Terminal Management.	
Truck Leaks/Spills Outside Terminal	
Notify local fire and police departments.	
Assist local responders (police) to secure the area.	
Notify Terminal Management of the incident with the following information: • Location of spill. • Size of spill. • Product type. • Present situation. • If assistance/equipment is required for cleanup. • If product spills on a highway or other impervious surface, clean area with sorbent materials, vacuum truck, or other cleanup equipment as available or necessary. If product has entered sewer system, advise the local Fire Department.	
Consider the need to evacuate area Facility. If requested, provide product information to local authorities (fire, police departments) as necessary.	

2.1 Spill Response Action Checklist, Continued

SPECIFIC RESPONSE ACTIONS	COMMENT
Marine Operation Spills/Leaks	
Shut down all engines/motors.	
Close all line and vessel manifold discharge valves.	
If hose rupture is involved, drain line into vessel, drums, or buckets and blank line to stop spill into water.	

Initiate Confined Space Entry procedures, as applicable.	
Utilize Combustible Gas Indicator, O_2 meter, proper colorimetric indicator and other air sampling measurements (as applicable) to assure that areas are safe to enter for continued response operations.	
If other than hose rupture, determine source of leak and stop discharge.	
Prevent discharge from entering the water if at all possible by: • Pumping from sump or deck drainage system into drums, tanks, containment area, or other storage facility. • Directing the flow into a containment or collection area away from the water, if feasible. • Placing containment boom or sorbent material around area (provided that a safe operating environment exists).	
If product enters the water and a safe operating environment exists, try to contain by: • Deploying spill response equipment (facility and/or contract) to prevent/mitigate spill impact (spreading of spill).	
Attempting to divert/contain the spill: • In quiet area or low current areas of the water. • Away from strong winds or in areas that could be affected by change in wind direction. • Away from areas of hazard to public, property improvements, marinas, water intakes, or any environmentally sensitive areas.	
Make all necessary repairs.	
Return the line/vessel to service when repairs are complete.	
Clean up spilled product to eliminate any possible environmental problems. Be alert for underground cables, etc.	
If the spill escapes the containment area, review the location of socioeconomic and environmentally sensitive areas identified in **SECTION 9.0** and the ACP. Determine which of these may be threatened by the spill and direct the response operation to these locations based on information in the tactical sites in **SECTION 6** of the Facility Response Plan and booming strategies in Geographic Response Plan. Initiate protection and recovery actions.	
Request local authorities (USCG, Port Authority, etc.) to establish traffic control in the area, as the situation demands.	

Inform local operators such as utilities, telephone company, railway, as necessary.	
Complete follow-up and written reporting, as the situation demands.	

2.2 Fire, Explosion, and Vapor Release Response Actions

SPECIFIC RESPONSE ACTIONS	COMMENT
FIRE / EXPLOSION	
1. Discontinue all tasks in progress (hot work, truck loading, maintenance, etc.)	
2. Sound local fire alarm, if available.	
3. Attempt to extinguish incipient stage fires, if trained to do so.	
4. Ensure 911 or local ER number was called to activate Fire and EMS support.	
Report the condition to Management and take further defensive actions as instructed.	
5. Report the Situation to QI/Management and ensure other internal/external notifications are in progress, as appropriate.	
6. Evacuate personnel to designated assembly areas and Account for personnel (roll call). Communicate any missing personnel (with potential last location) to the Fire Department.	
7. Emergency shutdown systems and/or manually (from a safe distance) isolate fuel sources and shut down engines and heaters.	
8. Ensure Asset emergency response plans have been activated. Ie: Facility Response Plan Security Plan	
9. Establish a secure perimeter around the area to prevent unauthorized entry per asset security plan.	
10. Liaison with Fire Department to continue tactical measures to contain the fire;	

11. Recognize fire conditions which present BLEVE hazards and protect personnel and the public appropriately. Communicate potential bleve hazards to Fire Department.	
12. Contain spilled material and runoff. Dike far ahead of the release, as necessary.	
13. Conduct post-incident activities.	
14. Ensure all incident/response documentation is compiled and filed.	
VAPOR RELEASE	
Report the release to Terminal Manager/Team Lead/QI.	
Sound the facility alarm.	
Do not assume vapors or gases are harmless because of lack of odor - **Harmful vapors or gases may be odorless.**	

2.2 Fire, Explosion, and Vapor Release Response Actions, Continued

SPECIFIC RESPONSE ACTIONS	COMMENT
VAPOR RELEASE, CONTINUED	
Evacuate personnel from the immediate area to the designated assembly area or to a location upwind of the release.	
Account for personnel using roll call.	
(b) (7)(F) [redacted]	
Isolate all sources of potential ignition.	
Establish a secure perimeter around the area to prevent unauthorized entry using Security Plan.	
Complete internal and external notifications, as appropriate.	
Assess the threat to the public and notify public officials as appropriate.	
Liaison with local Emergency Responders (Fire, Police) to evacuate surrounding homes, businesses, etc. Potentially impacted by vapor cloud.	
Conduct post-incident activities.	
Ensure all incident/response documentation is compiled and filed.	

2.2.1 BLEVE - Boiling Liquid Expanding Vapor Explosion

BLEVE occurs when:

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

Fire Fighters should do the following:

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

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

2.3 Medical Emergency / Personal Injury Checklist

SPECIFIC RESPONSE ACTIONS	COMMENT
General	
Medical emergencies may involve and/or be categorized as follows: a. **First Aid** - One or more patients with minor injuries which can be effectively managed with the application of routine First Aid. This type of injury does not require medical transport to a hospital, but may require follow-up with a Physician. b. **Serious** - One or more patients with moderate to serious injuries, requiring response by local Emergency Medical Services (EMS) and may include transport to a hospital for advanced care and treatment. c. **Life-Threatening** - One or more patients with serious or life-threatening injuries, requiring response by local Emergency Medical Services (EMS) and includes transport to a hospital for advanced care and treatment.	

Assess the scene.	
Summon local Emergency Medical Services (EMS) to the scene; provide information on the nature of injuries and number of injured persons (**FIGURE 3-4**).	
If trained, provide First Aid/CPR as necessary, until EMS arrives at the scene; injured personnel should not be moved unless the situation is life threatening.	
Assist with Medical Evacuation (via air or ground transport) as recommended by EMS personnel.	
Establish a secure perimeter around the area to prevent unauthorized entry. Initiate the Site Security Plan, as necessary.	
Notify Team Leader/Terminal Manager and make appropriate notifications to local emergency agencies if necessary. Make other internal management contacts as appropriate (**FIGURE 3-3**).	
In case of a fatality: • Do not move the victim. • Do not release name of victim(s). • Contact local law enforcement. • Contact local medical authority. • Preserve the accident site. • Restrict all communications concerning the incident (do not release names of victims unless authorized).	
Conduct post-incident activities.	
Ensure all incident/response documentation is compiled and filed.	

2.4 Earthquake/Tornado Procedure

SPECIFIC RESPONSE ACTIONS	COMMENT
1. Activate the emergency alarm, if available.	
2. Evacuate personnel from the immediate area to a safe assembly area. Determine safe location based on impact to facility.	
3. Account for personnel using roll call.	
4. Evaluate the extent of the emergency.	
5. If time permits, engage emergency shutdown systems and/or manually isolate processes and equipment.	
6. Notify the Team Leader/Terminal Manager and make other internal notifications, as appropriate. (**FIGURE 3-3**)	

7. Conduct an inspection for residual safety hazards, such as: • Process safety/integrity; • Structural damage; • Downed power lines; and • Leaking natural gas, water, and sewer lines.	
8. Arrange for necessary repairs.	
9. Conduct post-incident activities.	
10. Ensure all incident/response documentation is compiled and filed.	

2.5 Flooding Procedure

SPECIFIC RESPONSE ACTIONS	COMMENT
1. Account for personnel.	
2. Notify Manager and make other internal notifications, as appropriate. (**FIGURE 3-3**)	
3. Evaluate the extent of the emergency.	
4. Prepare an evacuation plan based upon flood crest and weather forecast.	
5. Maintain tank levels, as appropriate (consider filling tanks that might float with water).	
6. Secure all loose items in the area that could do harm to other equipment (pipe, tools).	
7. Engage emergency shutdown systems and/or manually isolate processes and equipment, if necessary.	
8. Evacuate personnel, as necessary. Conduct Accountability via roll call.	
9. Conduct an inspection for residual safety hazards, such as: • Structural damage; • Downed power lines; • Leaking natural gas, water, and sewer lines; • Poisonous snakes and other wildlife sheltering in structures, vehicles, and furniture; and	

• Avoid direct contact with flood water, mud, and animal carcasses.	
10. Arrange for necessary repairs.	
11. Conduct post-incident activities.	
12. Ensure all incident/response documentation is compiled and filed.	

2.6 Hurricane Procedure

SPECIFIC RESPONSE ACTIONS	COMMENT
Prior to Hurricane Season	
1. Conduct hurricane awareness training, which includes evacuation routes and asset hurricane procedures.	
2. Coordinate activities with local and state agencies involved in hurricane preparation (Emergency Access Cards, etc.).	
3. Communicate recommended Community Evacuation routes.	
4. Determine disposition of Company vehicles during evacuation.	
5. Each location should maintain current photographs of facilities.	
June 1st to November of Hurricane Season	
1. Verify the availability of and procure emergency supplies, as necessary: • Portable radios • Plywood, lumber, plastic sheeting, or covering • Drinking water • First Aid Kits • Flashlight and batteries • Tools • Emergency non-perishable food item	
2. Ensure emergency generators and portable equipment is in good working order and sufficient fuel is available.	
Hurricane entering Gulf of Mexico or Approaching East Coast	
1. Implement hurricane procedures.	
2. Identify employees who may volunteer to implement hurricane	

procedures.	
72 hours prior to hurricane's eye reaching landfall	
1. Cancel all training and meetings requiring travel to affected areas.	
2. Designate location for temporary Communication Center.	
3. Verify contractor contacts and availability.	
4. All employees shall provide to their supervisor an evacuation location and contact number.	
5. Each location shall identify a radio frequency which broadcasts emergency weather information.	
6. Report facility status to Corporate Management.	

2.6 Hurricane Procedure, Continued

SPECIFIC RESPONSE ACTIONS	COMMENT
48 hours prior to hurricane's eye reaching landfall	
1. Implement flex-shift to allow employees to secure personal property.	
2. Ensure all storage tanks are stabilized.	
3. Ensure all below ground sumps have been pumped dry.	
4. Secure all critical documents including electronic data.	
5. Elevate electrical equipment, sensitive office equipment and documents in the event of high water.	
6. Report facility status to Corporate Management.	
36 hours prior to hurricane's eye reaching landfall	
1. Communicate with suppliers and affected customers.	
2. Report facility status to Corporate Management.	
24 hours prior to hurricane's eye reaching landfall	
1. Begin shutdown operations.	

2. Release non-essential personnel.	
3. Report facility status to Corporate Management.	
12 hours prior to hurricane's eye reaching landfall	
1. Man Communications Center continuously.	
2. Report facility status to Corporate Management.	
Post Storm Recovery Procedure	
1. Initiate facility damage assessment.	
2. Report facility status to Corporate Management.	
3. Once access has been granted, the following processes should be surveyed for operational reliability prior to startup: • Electrical panels and motors, • Instrument air system, • Emergency Shutdown System, • Tank and Vessel foundation and support (possible washouts), and • Check for dangerous wildlife and reptiles.	

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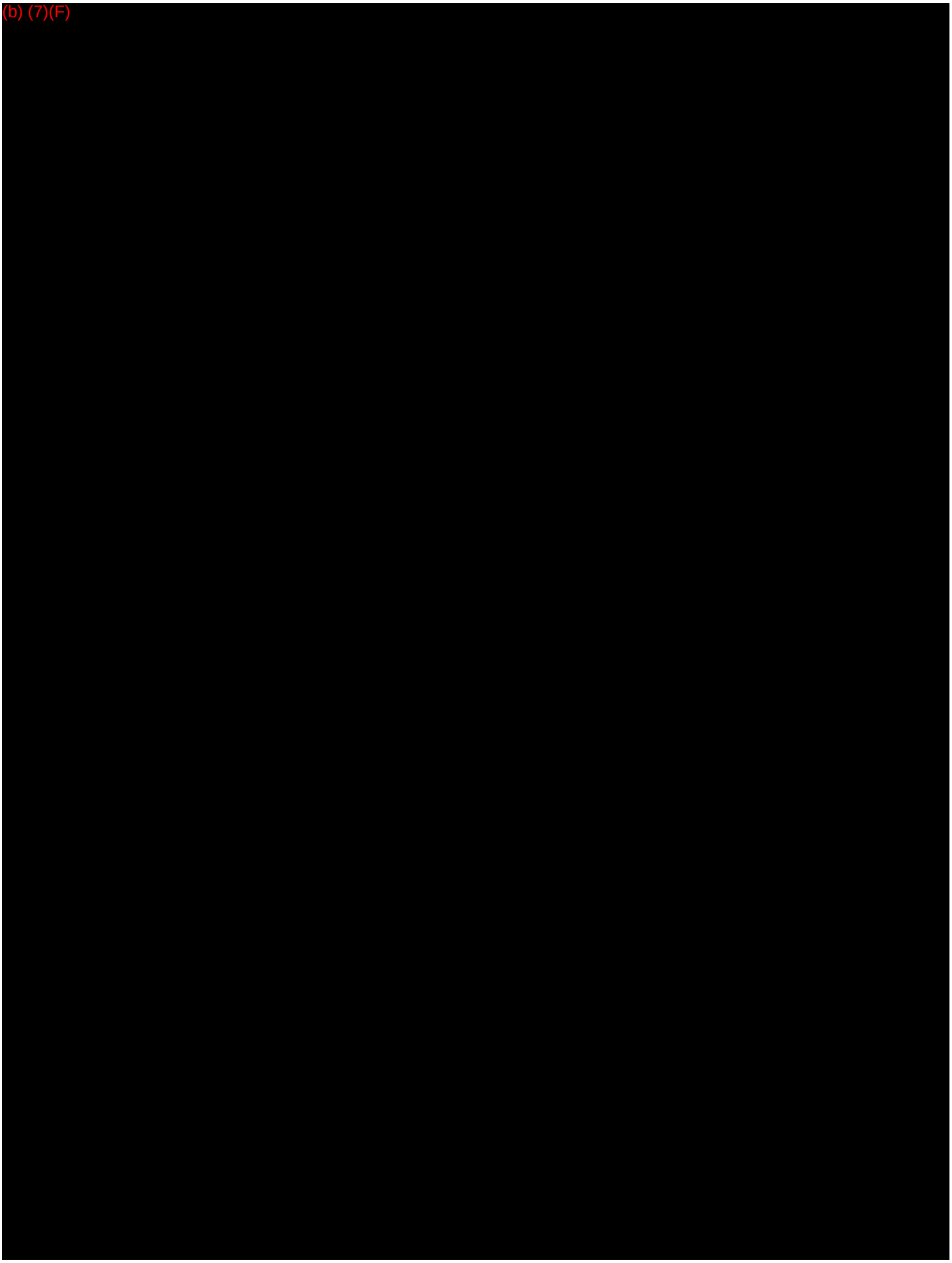
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2.11 Evacuation Checklist

SPECIFIC RESPONSE ACTIONS	COMMENTS
Request assistance from off-site agencies; convey Command Post's location.	
Assemble personnel at predetermined safe location: upwind/up gradient of release (regrouping area).	
Account for Company and contractor personnel.	
Assess casualties (number/type/location).	
Determine probable location of missing personnel.	
Secure site, establish re-entry point and check-in/check-out	

procedures.	
Develop list of known hazards (confined spaces, electrical hazards, physical hazards, vapors, oxygen deficiency, fire/explosion, etc.).	
Monitor situation (weather, vapors, product migration) for significant changes.	
Assist in developing a Rescue Plan, if necessary.	

2.11.1 Evacuation Factors

EVACUATION FACTORS	
FACTOR	**DESCRIPTION**
Stored material location	• Located in oil storage area. • Identified in Facility Plot Plan.
Spilled material hazards	• Hazard is fire/explosion.
Water currents, tides or wave conditions	• Data for tides and currents is from the National Oceanographic and Atmospheric Administration (NOAA) Station ID: 8531095 (Arthur Kills - Carteret - NJ). Arthur Kills sometimes referred to as Staten Island Sound is a tidal straight that connects Raritan Bay to the south with Newark Bay to the north separating Staten Island from mainland New Jersey. Because Arthur Kills is a tidal straight it can flow in either direction but generally has a north to south direction unless influenced by a weather tide event. The average tidal range is approximately 4.5 to 5.5 Feet from Mean Lower Low Water (MLLW) to high tide. The average tidal current is approximately 1.9 to 2.5 Knots. The data concerning tidal currents and direction flow is considered approximate as a result of previous tidal current predictions having been inaccurate as referenced by the United States Coast Pilot. The Coast Pilot states caution should be used to make visual observations of tidal current speeds due to insufficient knowledge of the hydrology of the Arthur Kills.
Evacuation routes	• Routes are summarized on Evacuation Plan Diagram. (**FIGURE 6-2**) • Criteria for determining safest evacuation routes from facility may include: wind direction, potential exposure to toxins and carcinogens, intense heat, potential for explosion/fire, and blockage of planned route by fire, debris, or released liquid.
Alternate evacuation routes	• Refer to Evacuation Plan Diagram. (**FIGURE 6-2**) • An alternate route off site is out the North gate. The secondary

	muster point is located just outside the North Gate, as shown on Figure C-3.
Injured personnel transportation	• Emergency services can be mobilized to the Facility. (**FIGURE 3-4**) • Hospital will be contacted and ambulance will used to transport critically injured personnel.

2.11.1 Evacuation Factors, Continued

EVACUATION FACTORS	
FACTOR	**DESCRIPTION**
Alarm/Notification system location	• Operations personnel should initially use "direct talk" cellular telephone communication to contact other facility personnel. • If this contact cannot be made, operations personnel should make contact by a brief tour of Terminal facilities, if this can be done without risk to personal safety. • All entrances and exits within the admin building and within the Terminal Operators' office. • Within the warehouse. • Within each kiosk at the load rack. • Emergency cut-off buttons are located at the Terminal. The Site Plan diagram shows the locations of these cut-off switches. Activating the cut-off/shut-off buttons stops product flow from the bulk fuel tanks. • Additionally security at the gasoline/diesel loading rack includes the fire control system that consists of a heat senor foam system which, if activated, will disable all loading operations at loading rack. • Refer to **FIGURE 2-1** for a description of warning alarms at the Facility.
Community evacuation plans	• Company may request local police assistance (see **FIGURE 3-4** for notification information). Community evacuations are the responsibility of these agencies. • The community evacuation plan for the facility area was not available for review.

2.11.1 Evacuation Factors, Continued

EVACUATION FACTORS	
FACTOR	**DESCRIPTION**
Spill flow direction	• The terminal yard (encompassing the area around the office, truck loading rack, etc.) and diked areas are relatively level and graded to direct runoff and potential oil discharges with to the drainage system, where collected runoff flows through one or two oil/water separators (OWS 1 and OWS 3) prior to discharge. • An oil discharge may leave the property by the following ways: • - In a containment (diked) area, a discharge would be contained within the secondary containment, unless the secondary containment also fails. If secondary containment fails, a discharge from a bulk storage tanks would tend to flow eastward and enter streams that flow into Arthur Kill. • - A discharge in the undiked area northeast of Tank 18 and north of Tank 19 would flow directly into the state open waters and then southeast to Arthur Kill. • - A discharge in the undiked area along the southern side of the terminal (i.e., from dock lines and/or manifold) would flow to the east and/or north and enter the tidelands along the eastern side of the terminal and then southeast to Arthur Kill. • - A discharge in the undiked areas at the dock or along the dock lines between the dock and Industrial Avenue would flow to the south and enter Arthur Kill. • - In the terminal yard, a discharge flows to OWS 1, which discharges to the Settling Pond and OWS 3. Therefore, a discharge in the yard is unlikely to leave the property. • Identified in Facility Drainage Diagram. (**FIGURE 6-1**)
Prevailing wind direction and speed	• The general prevailing wind direction is Southwest. • Because wind direction varies with weather conditions, consideration for evacuation routing will depend in part on wind direction.
Emergency personnel/response equipment arrival route	• The facility is accessible via Roosevelt Avenue • Directions to nearest medical facility provided below.

2.11.1 Evacuation Factors, Continued

EVACUATION FACTORS	
FACTOR	**DESCRIPTION**
Centralized check-in area (Personnel assembly area)	• Roosevelt Avenue Southwest side of terminal in the parking lot across the street • Supervisor/Senior employee is responsible for head count.
Mitigation Command Center location	• Holiday Inn (1000 Roosevelt Av., Carteret NJ 07008, 732-541-9500), or Radisson (30 Minue Street, Carteret NJ 07008, 732-541-2005) • Mobile Command Posts may be established as necessary.
Facility Shelter Location	• Holiday Inn (1000 Roosevelt Av., Carteret NJ 07008, 732-541-9500), or Radisson (30 Minue Street, Carteret NJ 07008, 732-541-2005) • Not a safe harbor from fires, explosions, vapor clouds, or other significant emergencies; however, may be used for temporary shelter from inclement weather.
Directions to nearest medical facility	Directions to Rahway Hospital : • Turn West on Roosevelt Ave., which turns into Randolph Ave, turn right on Hart St. to E. Hazelwood Ave turn left, continue on W. Hazelwood Ave. to Jefferson Ave. turn right go to Stone St. Which is location of Hospital.

3.0 NOTIFICATIONS

FIGURE 3-1 - EMERGENCY NOTIFICATION FLOW CHART

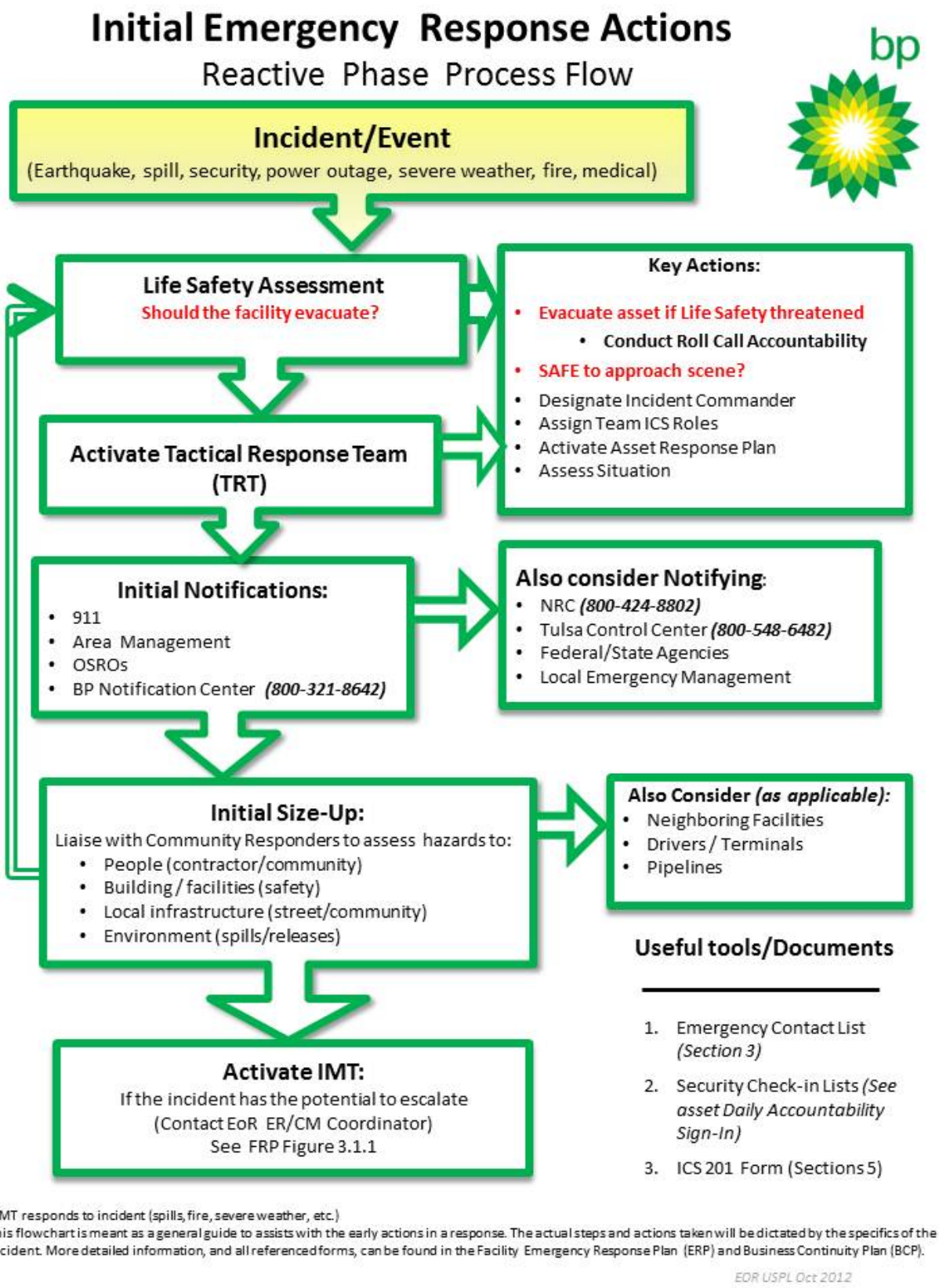

FIGURE 3-2 - RELEASE / DISCHARGE / INCIDENT TELEPHONE NOTICE

Do not delay making notifications while obtaining the information and completing this form.

INVOLVED PARTIES			
Reporting Party		**Suspected Responsible Party**	
Name:		Name:	
Phone: (Day)		Phone:	(Day)
(Evening)			(Evening)
Position:		Company:	
Company:		Organizational Type: ☐ Private Citizen ☐ Private Enterprise ☐ Public Utility ☐ Local Government ☐ State Government ☐ Federal Government	
Address:			
Person Discovering Incident			
Name:			
Company/Organization:			
City: State: Zip:			
Were materials released/discharged? ☐ Yes ☐ No		Calling for Responsible Party ☐ Yes ☐ No	

INCIDENT DESCRIPTION		
Start Date:	Time: ☐ AM ☐ PM	Weather:
End Date:	Time: ☐ AM ☐ PM	Latitude: _____ degrees _____ min _____ sec N
		Longitude: _____ degrees _____ min _____ sec W
Mile Post/River Marker:		
City/County:		Distance from City:
State:		Direction from City:
Source and Cause of Incident:		
Storage Tank Type: ☐ Above Ground ☐ Below Ground ☐ Unknown		
Tank Capacity:		Facility Capacity:

MATERIAL INFORMATION

CHRIS Code	Product Released / Discharged	Released / Discharged Quantity (Include units of measure)	Quantity in Water (Include units of measure)

FIGURE 3-2 - RELEASE / DISCHARGE / INCIDENT TELEPHONE NOTICE, CONTINUED

INITIAL IMPACT	
Number of Injuries:	Number of Deaths:
Were there Evacuations? ☐ Yes ☐ No	Number Evacuated:
Was there any Damage? ☐ Yes ☐ No	
Damage in dollars (estimate):	
Is the Release / Discharge Contained within the boundaries of the facility? ☐ Yes ☐ No	
Direction of Flow:	

RESPONSE ACTION(S)
Action(s) Taken to Correct, Control or Mitigate Incident:

ADDITIONAL INFORMATION
Any information about the incident not recorded elsewhere in the report (e.g., duration of spill; if incident is continuing, intermittent, or terminated; treatment or disposal measures).

COMPLETED NOTIFICATIONS						
Report	**Phone Number**	**Date**	**Case Number**	**Time**	**Name**	**Title**
NRC ☐	(800) 424-					

	8802*					

FIGURE 3-3 - INTERNAL NOTIFICATIONS AND TELEPHONE NUMBERS

*24 Hour Number

The Qualified Individual (QI) and Alternate QI have been granted the authority, including contracting authority, to implement the Facility Response Plan. Terminal personnel comprise the Facility Tactical Response Team (FTRT). The Initial FTRT will consist of the Terminal personnel on-duty at the time of an incident.

FACILITY TACTICAL RESPONSE TEAM						
NAME/TITLE	PHONE NUMBER	RESPONSE TIME (hours)	ICS POSITION	RESPONSE TRAINING TYPE[1]		
				1	2	3
Jack Cowart Terminal Manager Alternate Qualified Individual	(732) 541-5131 x605 (Office), (732) 969-0143 (Fax) (Office) (724) 759-3560 *(Mobile)	1	Alternate Incident Commander	x	x	x
Julea Mitchell Area Operations Manager Primary Qualified Individual	(732) 541-5131 ext. 609 (Office) (732) 423-5037 *(Mobile)	1	Alternate Incident Commander / Command Staff Support	x	x	x
James Lutter Safety & Health Coordinator	(732) 541-5131 #611 (Office) (b) (6) (806) 632-3235 *(Mobile)	2	Safety Officer, Site Safety Officer	x	x	x

EMERGENCY RESPONSE TRAINING TYPE	
There are three different types of training described below including HAZWOPER, OPA, 90 / ICS, and Qualified Individual Training. An "x" has been placed in the applicable columns (type 1, 2, or 3) in the table above for the type of training completed by each individual. Blank spaces indicate training has not been completed.	
TYPE	DESCRIPTION (All training completed on an annual basis.)
1	29 CFR 1910.120 HAZWOPER

2	OPA 90 (training Reference for Oil Spill Response) and ICS
3	Qualified Individual Training

FIGURE 3-3 - INTERNAL NOTIFICATIONS AND TELEPHONE NUMBERS, CONTINUED

*24 Hour Number

EMERGENCY RESPONSE PERSONNEL AND BUSINESS UNIT NOTIFICATIONS						
NAME/TITLE	PHONE NUMBER	RESPONSE TIME (hours)	ICS POSITION	RESPONSE TRAINING TYPE[1]		
				1	2	3
Carteret Terminal Security	(732) 522-1559 (Office)	1	Operations Support	x	x	
Peter Correia Supervisor	(732) 541-5131 x 603 (Office) (516) 341-9481 *(Mobile)	1	Operations/Planning Support	x	x	
Richard Stepnosky Operations Supervisor	(732) 541-5131 Ext. 603 (Office) (732) 718-5094 *(Mobile)	1	Operations/Planning Support	x	x	
Brian Whitaker Supervisor	(732) -541-5131 x 603 (Office) (732) 289-0830 *(Mobile)	1	Operations/Planning Support	x	x	
Stephen Zimenoff Supervisor	(732) 541-5131 x 603 (Office) (732) 522-2601 *(Mobile)	1	Operations/Planning Support	x	x	
Joseph Benson Operator	(732) 541-5131 x 608 (Office)	1	Operations/Planning Support	x	x	
Edmund Carter Operator	(732) 541-5131 x 608 (Office)	1	Operations/Planning Support	x	x	
Scott Chan Scheduler	(732) 541-5131 x 607 (Office)	1	Operations/Planning Support	x	x	

Ric Flores Operator	(732) 541-5131 x 608 (Office)	1	Operations/Planning Support	x	x	
Tim Jicha Operator	(732) 541-5131 x 608 (Office)	1	Operations/Planning Support	x	x	

EMERGENCY RESPONSE TRAINING TYPE	
There are three different types of training described below including HAZWOPER, OPA, 90 / ICS, and Qualified Individual Training. An "x" has been placed in the applicable columns (type 1, 2, or 3) in the table above for the type of training completed by each individual. Blank spaces indicate training has not been completed.	
TYPE	DESCRIPTION (All training completed on an annual basis.)
1	29 CFR 1910.120 HAZWOPER
2	OPA 90 (training Reference for Oil Spill Response) and ICS
3	Qualified Individual Training

FIGURE 3-3 - INTERNAL NOTIFICATIONS AND TELEPHONE NUMBERS, CONTINUED

*24 Hour Number

EMERGENCY RESPONSE PERSONNEL AND BUSINESS UNIT NOTIFICATIONS						
NAME/TITLE	PHONE NUMBER	RESPONSE TIME (hours)	ICS POSITION	RESPONSE TRAINING TYPE[1]		
				1	2	3
"Anne" Jin Wu Scheduler	(732) 541-5131 x 616 (Office) (917) 302-9696 *(Mobile)	1	Operations/Planning Support	x	x	
Mary Kurpell Admin Assist	(732) 541-5131 x 600 (Office)	1	Logistics Support	x	x	
Charles McGee Operator	(732) 541-5131 x 608 (Office)	1	Operations/Planning Support	x	x	
Wayne Sroka Operator	(732) 541-5131 x 608 (Office)	1	Operations/Planning Support	x	x	
Wilson Tubie Operator	(732) 541-5131 x 608 (Office)	1	Operations/Planning Support	x	x	
James Viering Operator	(732) 541-5131 x 608 (Office)	1	Operations/Planning Support	x	x	

Anthony Williams Operator	(732) 541-5131 x 608 (Office)	1	Operations/Planning Support	x	x	
Scott Williams Operator	(732) 541-5131 x 608 (Office) (201) 741-0052 *(Mobile)	1	Operations/Planning Support	x	x	
Sean Wilson Operator	(732) 541-5131 x 608 (Office)	1	Operations/Planning Support	x	x	
Paula Skryja Emergency Response/Crisis Management Coordinator	(708) 390-5521 (Office) (443) 310-2099 *(Mobile)	4-6	Crisis Management Advisor	x	x	x

EMERGENCY RESPONSE TRAINING TYPE	
There are three different types of training described below including HAZWOPER, OPA, 90 / ICS, and Qualified Individual Training. An "x" has been placed in the applicable columns (type 1, 2, or 3) in the table above for the type of training completed by each individual. Blank spaces indicate training has not been completed.	
TYPE	DESCRIPTION (All training completed on an annual basis.)
1	29 CFR 1910.120 HAZWOPER
2	OPA 90 (training Reference for Oil Spill Response) and ICS
3	Qualified Individual Training

FIGURE 3-3 - INTERNAL NOTIFICATIONS AND TELEPHONE NUMBERS, CONTINUED

*24 Hour Number

EMERGENCY RESPONSE PERSONNEL AND BUSINESS UNIT NOTIFICATIONS						
NAME/TITLE	PHONE NUMBER	RESPONSE TIME (hours)	ICS POSITION	RESPONSE TRAINING TYPE[1]		
				1	2	3
Tyrone Mitchell Regional Operations Manager	(678) 837-3802 (Office) (b) (6) (Home) (409) 771-8255 *(Mobile)	4-6	Liaison Officer	x	x	
	(732) 541-5131 #619					

Robert J. Tworkowski Environmental Coordinator	(Office) (b) (6) (240) 461-0750 *(Mobile)	4-6	Environmental Unit Leader	x	x	x
Jeff Cordy Engineering & Maintenance	(540) 937-4514 or (540) 937-6211 (Office) (b) (6) (540) 729-5257 *(Mobile)	4-6	Planning Support			
Corporate Security	(630) 420-4400* (Office)	N/A				
Ronald Rybarczyk Government & Public Affairs Director (GPA)	(419) 698-6376 (Office) (b) (6) (816) 536-1328 *(Mobile)	4-6	Public Information Officer / Alternate Liaison Officer		x	x
Neil Geary Government & Public Affairs (GPA)	(281) 504-8782 (Office) (281) 513-9727 *(Mobile)	4-6	Alternate Public Information Officer			
BP Notification Center (BPNC)	(800) 321-8642* (Office), (630) 961-6200 (Office), (630) 961-6965 (Fax) (Office)	N/A				

EMERGENCY RESPONSE TRAINING TYPE	
There are three different types of training described below including HAZWOPER, OPA, 90 / ICS, and Qualified Individual Training. An "x" has been placed in the applicable columns (type 1, 2, or 3) in the table above for the type of training completed by each individual. Blank spaces indicate training has not been completed.	
TYPE	DESCRIPTION (All training completed on an annual basis.)
1	29 CFR 1910.120 HAZWOPER
2	OPA 90 (training Reference for Oil Spill Response) and ICS
3	Qualified Individual Training

FIGURE 3-3 - INTERNAL NOTIFICATIONS AND TELEPHONE NUMBERS,

CONTINUED

*24 Hour Number

EMERGENCY RESPONSE CONTRACTORS			
NAME/TITLE	**PHONE NUMBER**	**RESPONSE TIME (hours)**	**RESPONSIBILITY DURING RESPONSE ACTION**
Atlantic Response Inc.	(732) 969-8555	0.5	Equipment and Personnel Emergency Response Support
Clean Harbors Cooperative	(908) 862-7500 (908) 862-7560 Fax	1	Equipment and Personnel Emergency Response Support
Marine Spill Response Corporation (MSRC)	(800) 645-7745 or (800) 259-6772 (732) 417-0500 (800) 635-6772 Fax	2	Equipment and Personnel Emergency Response Support

FIGURE 3-4 - EXTERNAL NOTIFICATIONS AND TELEPHONE NUMBERS

*24 Hour Number

AFFILIATION	PHONE NUMBER	TIME CONTACTED
Initial		
Carteret Fire Department	911* (732) 541-4181	
Carteret Police Department	911* (732) 541-4181	
National Response Center (NRC) - NRC will contact the USCG and EPA completing the Federal notifications.	(800) 424-8802* (202) 267-2675* (202) 267-1322 Fax	
New Jersey Department of Environmental Protection	(877) WARN DEP (877) 927-6337	
Recommended		
Federal Agencies		
Army Corps of Engineers	(732) 846-5830	
Department of Transportation (DOT)	(202) 366-4000	
Occupational Safety and Health Administration (OSHA) - Washington, D.C.	(800) 321-6742*	
U.S. Coast Guard - Activities NY	(718) 354-4353	
U.S. Environmental Protection Agency Hotline/National Response Center	(800) 424-8802	
U.S. Fish and Wildlife Service, Trenton,	(609) 214-7895	

NJ		
State Agencies		
New Jersey SERC; State Office of Emergency Management, Regional Operations and Intelligence Center (ROIC)	(609) 963-6900	
New Jersey State Fire Marshall	(609) 633-6106	
New Jersey State Police	(973) 578-8173	
New York Department of Environmental Conservation (DEC)	(800) 457-7362* Spill Notification (518) 457-7362	
Local Agencies		
Board of Health	(732) 541-3890	

FIGURE 3-4 - EXTERNAL NOTIFICATIONS AND TELEPHONE NUMBERS

*24 Hour Number

AFFILIATION	PHONE NUMBER	TIME CONTACTED
Recommended, Continued		
Local Agencies		
Civil Defense	732-541-4007	
Local Emergency Planning Committee (LEPC)	(732) 541-4007	
Water & Sewage System	(732) 541-3875	
Emergency Medical Services		
Ambulance	911* (732) 541-4181	
American Red Cross	(800) 448-3543	
Rahway Hospital	(732) 381-4200	
Raritan Bay Medical Center	(732) 442-3700	
USCG Classified OSRO's		
Atlantic Response Inc. Carteret, NJ	(732) 969-8555	
Clean Harbors Cooperative Linden, NJ	(908) 862-7500 (908) 862-7560 Fax	
Marine Spill Response Corporation (MSRC) Edison, NJ	(800) 645-7745 or (800) 259-6772 (732) 417-0500 (800) 635-6772 Fax	
Neighboring Facilities		

Arthur Kill LLC - Arthur Kill Generating Station	(718) 390-2734	
ICL Performance Products LP - Carteret, NJ Plant	(732) 570-2027*	
Kinder Morgan	(732) 541-5161*	
Radio Stations		
WCBS News	(212) 975-8988	
Service Providers (as needed)		
Auchter Ind. Services	(908) 862-2277	

FIGURE 3-4 - EXTERNAL NOTIFICATIONS AND TELEPHONE NUMBERS

*24 Hour Number

AFFILIATION	PHONE NUMBER	TIME CONTACTED
Recommended, Continued		
Service Providers (as needed)		
Buckeye P/L	(908) 862-6060*	
CHEMTREC - Washington, D.C.	(800) 424-9300	
Colonial P/L	(732) 750-0727*	
Ferrara Electric	(646) 208-3072	
Fuels Technology, Warrenville, IL	(630) 845-4500 (630) 845-4501 FAX	
Natural Resources Damage Assessment (NRDA) - Washington State, Attn: Gary Mauseth	(425) 823-4841 (206) 954-9648	
Television Stations		
WNET	(973) 643-3315	
Transport Companies		
CSX Railroad (Suspend Train Operations)	(800) 232-0144*	
Waste Management		
Chemtron Corp. - Avon, OH	(440) 933-6348	
Heritage Environmental Services LLCKansas City, MO	(816) 453-4321 (866) 436-8778 (816) 753-0180 Fax	
WasteTrak (List of approved disposal sites): https://www.wastetrak.com/security/login.asp. BP Terminal Mangers and ECs have the required login information.		
Weather		
National Weather Service (Recorded	(609) 261-6600	

Forecasts)		
Wildlife Rehabilitation		
TRI-State (Wildlife clean-up & Rehabilitation) - Delaware	(800) 710-0695 Pager (800) 710-0696 Pager (302) 737-7241 Office	

4.0 PUBLIC AFFAIRS

This section contains guidelines for dealing with the media during an emergency. The Incident Commander will play a key role in providing the initial public assessment and taking the first steps to provide the Company's public response. Information in this section includes:

- Guidelines for dealing with the media
- Incident Fact Sheet (**FIGURE 4-1**)

GUIDELINES FOR DEALING WITH THE MEDIA

- You as a Company Manager are the most logical person for reporters to seek out for information
- Reporters will look elsewhere to find out what happened if you do not answer their questions; however, if you do not have this information or are not prepared to answer a particular question, say so then say when they can expect the answers to their questions (such as one hour)
- It is important to be courteous to all media representatives and to provide a safe place for them to wait until a company representative can meet them; you may need to provide an initial statement

Provide	• A brief, general description of what happened • Steps being taken to handle the emergency
Don't provide	• Names of deceased or seriously injured employees until the next of kin have been notified • Speculation about the cause of the emergency • Any statement implying personal or company negligence • Number of injured or killed, if known • Cost estimates of damage
Other considerations	• Safety considerations should always receive priority in determining access to company property

- Anticipate likely questions
- There are only six questions that can be asked about any subject: who, what, when, where, why, and how
- Keep answers short and understandable
- Answer only the question that is asked by the reporter
- Give the most important facts first
- Talk to the public's concern about the incident such as whether these were deaths, injuries, any threat to the public, or danger of explosion or fire
- If you don't know the answer to a question, don't be afraid to say "I don't know"; make note of the question and tell the reporter that you will try to get the answer - then do it
- Don't be defensive

Other considerations, continued:

- There is no such thing as "Talking off the record"; assume that anything and everything you say to a reporter is going to be printed and/or used in the story
- Avoid "What If?" or speculative questions; these questions should be answered with a restatement of the problem and what is being done to control it
- Don't speculate about the cause of the incident
- Don't minimize the situation

FIGURE 4-1 - INCIDENT FACT SHEET

What occurred:
When (time):
Where (location):
What are hazards:
How is the situation being handled:
What agencies have been notified: **All necessary agencies have been notified.**

Has outside help been requested: **All necessary assistance has been requested.**
Is there danger to the plant:
Is there danger to the community:
What:
Is there an environmental hazard:
What is the environmental hazard:
What is being done to minimize environmental threat: **All appropriate actions to protect the environment are being taken.**
Is there a need for evacuation:

5.0 RESOURCES

FIGURE 5-1 - INCIDENT MANAGEMENT TEAM ORGANIZATION CHART

(Click to view larger)

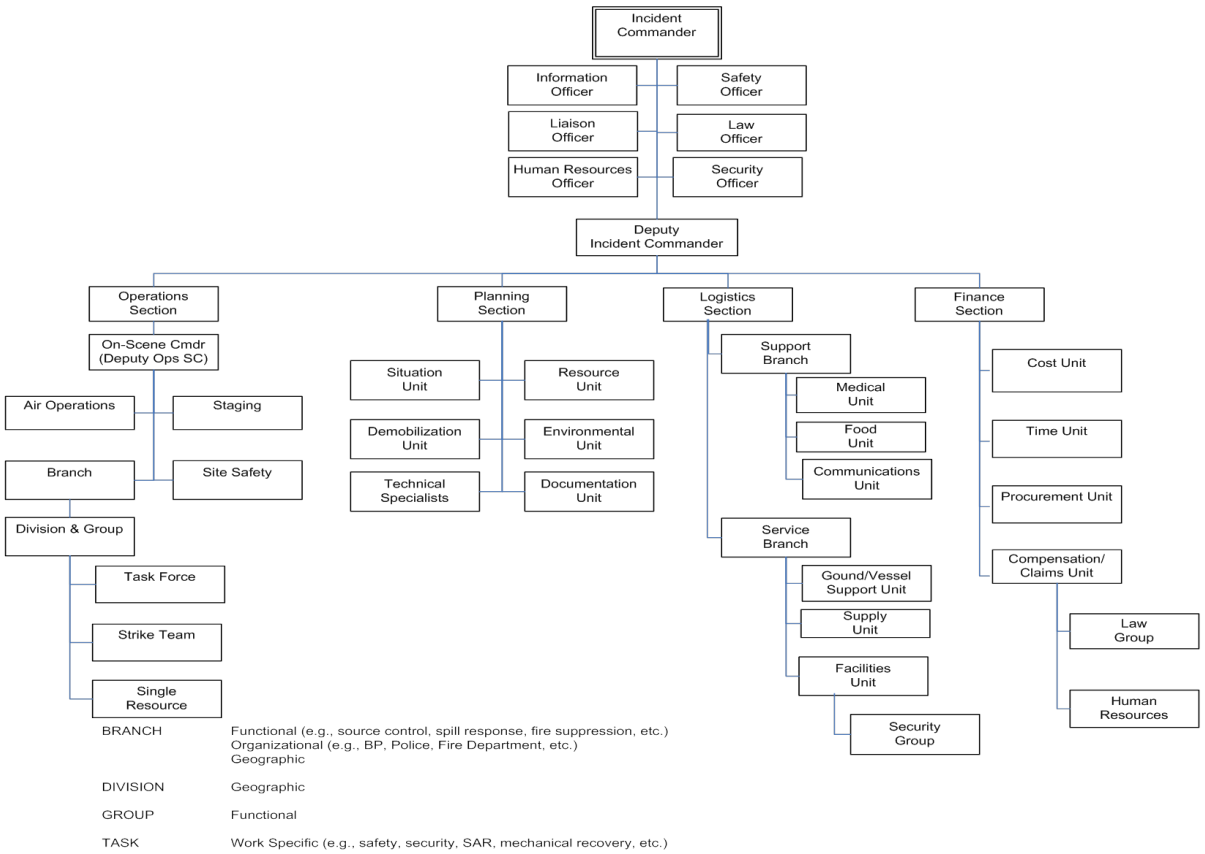

FIGURE 5-2 - FACILITY EQUIPMENT*

CATEGORY	TYPE/MODEL	QUANTITY	SIZE	YEAR PURCHASED	OPERATIONAL STATUS	LOCATION AT FACILITY
Carteret Terminal						
Absorbents	Absorbent pads	2 packages per spill kit	100/package (Approx. 0.03 gallons absorbing capacity per pad; 10 to 25 times pad weight in oil)	N/A	Operational	3 Spill Kits (in Overpack Salvage Drums); one each at Dock, Cell 3, and Dock House
Absorbents	Absorbent booms	3 booms	3-inch diameter by 8 feet long (Approx. 2-gallon oil absorbing capacity per boom)	N/A	Operational	3 Spill Kits (in Overpack Salvage Drums); one each at Dock, Cell 3, and Dock House
Absorbents	Absorbent booms	7 booms	5-inch diameter by 10 feet long (Approx. 5- to 7-gallon oil absorbing capacity per boom)	N/A	Operational	3 Spill Kits (in Overpack Salvage Drums); one each at Dock, Cell 3, and Dock House
Absorbents	Absorbent pads	2 packages per spill kit	50/package (Approx. 0.0.3 gallons absorbing capacity per pad; 10 to 25 times pad weight in oil)	N/A	Operational	Spill Kits (in Overpack Salvage Drums) atLoading Rack Lane 1 and Lane 6
Absorbents	Absorbent booms	8 booms per spill kit	5-inch diameter by 10 feet long (Approx. 5- to 7-gallon oil absorbing capacity per boom)	N/A	Operational	Spill Kits (in Overpack Salvage Drums) at Loading Rack Lane 1 and Lane 6

Absorbents	Absorbent pads	6 packages	100/package (Approx. 0.03 gallons absorbing capacity per pad; 10 to 25 times pad weight in oil)	N/A	Operational	Upper Facility Warehouse
Absorbents	Absorbent booms	20 booms	3-inch diameter by 8 feet long (Approx. 2-gallon oil absorbing capacity per boom)	N/A	Operational	Upper Facility Warehouse
Absorbents	Granular Absorbent	8 bags	25 pounds per bag (Approx. 5 to 6 gallons absorbing capacity per bag)	N/A	Operational	Upper Facility Warehouse
Boats and Motors	None	N/A	N/A	N/A	N/A	N/A
Boom	None	N/A	N/A	N/A	N/A	N/A
Chemical Countermeasures Agents Stored	None	N/A	N/A	N/A	N/A	N/A

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

FIGURE 5-2 - FACILITY EQUIPMENT*

CATEGORY	TYPE/MODEL	QUANTITY	SIZE	YEAR PURCHASED	OPERATIONAL STATUS	LOCATION AT FACILITY
Carteret Terminal						
Communications Equipment	Intrinsically-safe Motorola Portable Radios	14	N/A	N/A	Operational	On-Site
Communications Equipment	Intrinsically-safe Cell Phones with direct communications	6	N/A	N/A	Operational	On-Site

	(Push to Talk)					
Fire Extinguishers	ID # CM-1, CR-1, K-1, L-1	4			Operational	Terminal Office
Fire Extinguishers	ID # BE-1, BE-2, BEP-1, TK10, RP-1, ROP-1, ROP-2, TK-94, TK-27, TKE-28	10			Operational	Tank Area
Fire Extinguishers	ID # ACA-1	1			Operational	Warehouse ACA
Fire Extinguishers	ID # WH-1, WH-2, WH-3	3			Operational	Upper Warehouse
Fire Extinguishers	ID # LR-1, LR-IA, LR-2, LR-3, LR-4, LR-5A, LR-5B, LR-6A	8			Operational	Load Rack (Truck)
Fire Extinguishers	ID # DO-1, DO-2, DC-1, DC-2, DC-3, DW-1	6			Operational	Dock
Fire Extinguishers	ID # TG-1, TG-2	2			Operational	Garage
Fire Extinguishers	ID # FT-1, FT-2, FT-3, FT-4	4			Operational	Company Vehicles
Fire Extinguishers	ID # KH-1	1			Operational	Key House

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

FIGURE 5-2 - FACILITY EQUIPMENT*

CATEGORY	TYPE/MODEL	QUANTITY	SIZE	YEAR PURCHASED	OPERATIONAL STATUS	LOCATION AT FACILITY
Carteret Terminal						
Fire Extinguishers	ID # KH-1	1			Operational	Sample Room
Fire Extinguishers	ID # CH-1, CH-2	2			Operational	Colonial Shed
Fire Extinguishers (Wheeled)	ID # F-1, F-2, F-3	3			Operational	Load Rack (Truck)

First Aid	First Aid Kit	1 each			Operational	Terminal Office and Dock House
Hand Tools	Shovels, Pails, Brooms	4 each	N/A	N/A	Operational	Dock House
Hand Tools	Shovels, Pails, Brooms	4 each	N/A	N/A	Operational	Loading Rack
Hand Tools	Shovels, Pails, Brooms	4 each	N/A	N/A	Operational	Upper Plant Warehouse
Other (Heavy Equipment, Cranes, Dozers, etc.)	None	N/A	N/A	N/A	N/A	N/A
Skimmers/Pumps	None	N/A	N/A	N/A	N/A	N/A
Sorbents	None	N/A	N/A	N/A	N/A	N/A

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

FIGURE 5-3 - REGIONAL COMPANY AND RESPONSE CONTRACTOR'S EQUIPMENT LIST / RESPONSE TIME

*USCG Classified OSRO for facility

COMPANY/CONTRACTOR	EQUIPMENT	RESPONSE TIME
*Atlantic Response Inc. Carteret, NJ	Full Response Capabilities per U.S. Coast Guard Classification	0.5 hours
*Clean Harbors Cooperative Linden, NJ	Full Response Capability per U.S. Coast Guard Classification	1 hours
*Marine Spill Response Corporation (MSRC) Edison, NJ	Full Response Capabilities per U.S. Coast Guard Classification, including aerial tracking and dispersants	2 hours

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

- Atlantic Response Inc., Carteret, NJ
- Clean Harbors Cooperative, Linden, NJ
- Marine Spill Response Corporation (MSRC), Edison, NJ

FIGURE 5-4 - EPA REQUIRED RESPONSE EQUIPMENT TESTING AND DEPLOYMENT

DRILL LOG

The following form will be used to document containment boom deployments, but other forms may be used to document inspections. Refer to **SECTION 7.1.2** of the Facility Response Plan for additional Information on response equipment inspections and testing. Response equipment inspections records are maintained in the Facility office for at least five (5) years. Refer to the Facility Response Plan **APPENDIX G** for samples of completed response equipment inspection forms and **APPENDIX H** for copies of blank response equipment inspection forms.

Item:	Date of Last Update:
ACTIVITY	**INFORMATION**
Last inspection or response equipment test date	
Inspection frequency	
Last deployment drill date	
Deployment frequency	
OSRO Certification (if applicable)	

Item:	Date of Last Update:
ACTIVITY	**INFORMATION**
Last inspection or response equipment test date	
Inspection frequency	
Last deployment drill date	
Deployment frequency	
OSRO Certification (if applicable)	

Item:	Date of Last Update:
ACTIVITY	**INFORMATION**
Last inspection or response equipment test date	
Inspection frequency	
Last deployment drill date	
Deployment frequency	
OSRO Certification (if applicable)	

Item:	Date of Last Update:
ACTIVITY	**INFORMATION**
Last inspection or response equipment test date	
Inspection frequency	
Last deployment drill date	

Deployment frequency	
OSRO Certification (if applicable)	

FIGURE 6-1 - FACILITY SITE PLAN

Click here to view - Facility Site Plan Upper Plant 10/17/2012

FIGURE 6-1 - FACILITY SITE PLAN , CONTINUED

Click here to view - Facility Site Plan Lower Plant 10/17/2012

FIGURE 6-2 - DRAINAGE DIAGRAM

(Click here for Drainage Diagram)

FIGURE 6-3 - EVACUATION DIAGRAM

(Click here for Evacuation Diagram)

FIGURE 6-3 - EVACUATION DIAGRAM, CONTINUED

(Click here for Evacuation Diagram)

FIGURE 6-4 - TANK TABLE

FIGURE C-8 Spill History in the Facility Response Plan has information on any spills from tank failures. Additional information on secondary containment, including supporting calculations, is provided in the SPCC Plan. Secondary containment at the Facility is considered to be sufficiently impervious to contain discharged oil until clean up occurs.

Container/ Source	Major Type of Failure	Total Capacity (gal)	Secondary Containment Volume Type (gal)	Tank Type	Year Constructed/ Installed	Quantity Stored (gal)	Direction of Flow/Rate (See Plot Plan)	Product Stored
ABOVEGROUND CONTAINERS - (b) (7)(F)								
10 (DOT)	Overfill /	(b) (7)(F)		Internal Floating	1979	(b) (7)(F)	East / Instantaneous	Gasoline

	Rupture / Leakage	(b) (7)(F)	Roof		East / Instantaneous	
11 (DOT)	Overfill / Rupture / Leakage		Cone	1922	East / Instantaneous	Distillate
14 (DOT)	Overfill / Rupture / Leakage		Cone	1979	East / Instantaneous	Distillate
15 (DOT)	Overfill / Rupture / Leakage		Cone	1979	East / Instantaneous	Distillate
16 (DOT)	Overfill / Rupture / Leakage		External Floating Roof with Dome	1955	East / Instantaneous	Gasoline
17 (DOT)	Overfill / Rupture / Leakage		Internal Floating Roof	1923	East / Instantaneous	Gasoline
18 (DOT)	Overfill / Rupture / Leakage		Cone with Internal Alum Floater	1923	East / Instantaneous	Gasoline
19 (DOT)	Overfill / Rupture / Leakage		Cone with Internal Alum Floater	1923	East / Instantaneous	Gasoline
23 (DOT)	Overfill / Rupture / Leakage		External Floating Roof with Dome	1955	East / Instantaneous	Gasoline
25	Overfill / Rupture / Leakage		Cone with Internal Alum Floater	1923	East / Instantaneous	Denatured Ethanol / Gasoline
26 (DOT)	Overfill / Rupture		Cone	1923	East / Instantaneous	Distillate

	/ Leakage					
27 (DOT)	Overfill / Rupture / Leakage	Cone	1923		East / Instantaneous	Distillate
28 (DOT)	Overfill / Rupture / Leakage	Cone	1923		East / Instantaneous	Distillate
70 (DOT)	Overfill / Rupture / Leakage	Internal Floating Roof	1940		East / Instantaneous	Gasoline

Containment Type: 1=Earthen Berm and Floor, 2=Concrete Berm and Floor, 3=Metal Berm and Floor, 4=Portable Containment or Inside Building, 5=Double Walled, * Not in Containment Area, ** Curbing and containment system

FIGURE 6-4 - TANK TABLE , CONTINUED

FIGURE C-8 Spill History in the Facility Response Plan has information on any spills from tank failures. Additional information on secondary containment, including supporting calculations, is provided in the SPCC Plan. Secondary containment at the Facility is considered to be sufficiently impervious to contain discharged oil until clean up occurs.

Container/ Source	Major Type of Failure	Total Capacity (gal)	Secondary Containment Volume Type (gal)	Tank Type	Year Constructed/ Installed	Quantity Stored (gal)	Direction of Flow/Rate (See Plot Plan)	Product Stored
ABOVEGROUND CONTAINERS - Total								
71 (DOT)	Overfill / Rupture / Leakage			Internal Floating Roof	1940		East / Instantaneous	Gasoline
95 (DOT)	Overfill / Rupture / Leakage			External Floating Roof with Dome	1947		East / Instantaneous	Gasoline
96 (DOT)	Overfill / Rupture / Leakage			Internal Floating Roof	2004		East / Instantaneous	Gasoline
Fire Pump Fuel Tank	Overfill /			Horizontal	Unknown		East / Instantaneous	Fire Pump Fuel

	Rupture / Leakage	(b) (7)(F)						Tank
Rack Slop Tank	Overfill / Rupture / Leakage			Horizontal	2006	(b) (7)	East / Instantaneous	Slop
ADDITIVE CONTAINERS - (b) (7)(F)						(b) (7)(F)		
A-28	Overfill / Rupture / Leakage	(b) (7)(F)		Horizontal	2001		East / Instantaneous	Tank Water Bottom
A-29	Overfill / Rupture / Leakage			Horizontal	1997		East / Instantaneous	Diesel Dye
Sample Shed #1	Overfill / Rupture / Leakage			Horizontal	1992		East / Instantaneous	Slop
#4	Overfill / Rupture / Leakage			Horizontal	1995		East / Instantaneous	Recovered Product
10A	Overfill / Rupture / Leakage			Horizontal	2010		East / Instantaneous	Additive
109	Overfill / Rupture / Leakage			Horizontal	2010		East / Instantaneous	Additive
A-7	Overfill / Rupture / Leakage			Horizontal	1986		East / Instantaneous	Gasoline Additive
A-8	Overfill / Rupture / Leakage			Cone	1993		East / Instantaneous	Gasoline Additive
A-21	Overfill /			Horizontal	1996		East / Instantaneous	OWS-1 Slop

	Rupture / Leakage							Tank

Containment Type: 1=Earthen Berm and Floor, 2=Concrete Berm and Floor, 3=Metal Berm and Floor, 4=Portable Containment or Inside Building, 5=Double Walled, * Not in Containment Area, ** Curbing and containment system

FIGURE 6-4 - TANK TABLE , CONTINUED

FIGURE C-8 Spill History in the Facility Response Plan has information on any spills from tank failures. Additional information on secondary containment, including supporting calculations, is provided in the SPCC Plan. Secondary containment at the Facility is considered to be sufficiently impervious to contain discharged oil until clean up occurs.

Container/ Source	Major Type of Failure	Total Capacity (gal)	Secondary Containment Volume Type (gal)	Tank Type	Year Constructed/ Installed	Quantity Stored (gal)	Direction of Flow/Rate (See Plot Plan)	Product Stored
ADDITIVE CONTA			(b) (7)(F)					
A-22	Overfill / Rupture / Leakage	(b) (7)(F)		Horizontal	1995	(b) (7)(F)	East / Instantaneous	Dock Slop Tank
DRUM STORAGE AREA - Total:								
Storage Area (Adjacent to Tank 96)	Leak / Failure	(b) (7)(F)		Drums	N/A	(b) (7)	East / Instantaneous	Varies
OIL - FILLED ELECTRICAL EQUIPMENT - Total:								
XFR-1	Leak / Rupture			Transformer			Southeast / pinhole to catastrophic	Mineral Oil
XFR-2	Leak / Rupture			Transformer			Southeast / pinhole to catastrophic	Mineral Oil
XFR-3	Leak / Rupture			Transformer			Southeast / pinhole to catastrophic	Mineral Oil
XFR-4	Leak / Rupture			Transformer			Southeast / pinhole to catastrophic	Mineral Oil
XFR-5	Leak / Rupture			Transformer			Southeast / pinhole to catastrophic	Mineral Oil
XFR-6	Leak / Rupture			Transformer			Southeast / pinhole to catastrophic	Mineral Oil

XFR-7	Leak / Rupture			Transformer			Southeast / pinhole to catastrophic	Mineral Oil
XFR-8	Leak / Rupture			Transformer			Southeast / pinhole to catastrophic	Mineral Oil
OIL - FILLED MECHANICAL EQUIPMENT - Total:								
none	-			-			-	-
SURFACE IMPOUNDMENTS - Total:								
none	-			-			-	-
UNDERGROUND CONTAINERS - Total:								
none	-			-			-	-
Facility Total: 59,373,599								

Containment Type: 1=Earthen Berm and Floor, 2=Concrete Berm and Floor, 3=Metal Berm and Floor, 4=Portable Containment or Inside Building, 5=Double Walled, * Not in Containment Area, ** Curbing and containment system

7.0 ENDANGERED AND THREATENED SPECIES BY STATE

ENDANGERED AND THREATENED SPECIES BY STATE

COMMON NAME	SCIENTIFIC NAME	HABITAT	STATUS	STATE
Bat, Indiana	*Myotis sodalis*	Caves, mines, upland forests	E	New Jersey
Chaffseed, American	*Schwalbea americana*	Acidic, sandy or peaty soils in open pine flatwoods	E	New Jersey
Sea turtle, hawksbill	*Eretmochelys imbricata*	Clear offshore waters off the mainland and on island shelves	E	New Jersey
Sea turtle, Kemp's ridley	*Lepidochelys kempii*	Shallow areas with sandy and muddy bottoms	E	New Jersey
Sea turtle, leatherback	*Dermochelys coriacea*	Warm sands of tropical beaches	E	New Jersey
Sturgeon, shortnose	*Acipenser brevirostrum*	Rivers, estuaries, and the sea	E	New Jersey
Tern, roseate northeast U.S. nesting pop.	*Sterna dougallii dougallii*	Coastal islands and beaches	E	New Jersey
Wedgemussel, dwarf	*Alasmidonta heterodon*	Slow moving, sandy rivers	E	New Jersey
Whale, finback	*Balaenoptera physalus*	Offshore ocean waters	E	New Jersey
Whale, humpback	*Megaptera*	Surface of the ocean	E	New Jersey

	novaeangliae			
Whale, right	*Balaena glacialis (incl. australis)*	Surface of the ocean	E	New Jersey
Amaranth, seabeach	*Amaranthus pumilus*	Dunes, overwash fans and other areas of bare sand	T	New Jersey
Beaked-rush, Knieskern's	*Rhynchospora knieskernii*	Slow-moving streams in the New Jersey Pinelands region	T	New Jersey
Joint-vetch, sensitive	*Aeschynomene virginica*	Freshwater to slightly brackish tidal marshes	T	New Jersey
Pink, swamp	*Helonias bullata*	Acidic wetlands	T	New Jersey
Plover, piping except Great Lakes watershed	*Charadrius melodus*	Sandy beaches, islands	T	New Jersey
Pogonia, small whorled	*Isotria medeoloides*	Cidic soils, in dry to mesic second-growth	T	New Jersey

ENDANGERED AND THREATENED SPECIES BY STATE, CONTINUED

COMMON NAME	SCIENTIFIC NAME	HABITAT	STATUS	STATE
Sea turtle, green except where endangered	*Chelonia mydas*	Coasts, open sea	T	New Jersey
Sea turtle, loggerhead	*Caretta caretta*	Estuaries, coastal streams and salt marshes	T	New Jersey
Tiger beetle, northeastern beach	*Cicindela dorsalis dorsalis*	Coastal beaches	T	New Jersey
Turtle, bog (=Muhlenberg) northern	*Clemmys muhlenbergii*	Calcareous (limestone) fens, sphagnum bogs, and wet, grassy pastures	T	New Jersey

8.0 VULNERABILITY ANALYSIS

VULNERABILITY ANALYSIS (DETAILED)
(b) (7)(F) [redacted]

(b) (7)(F)

(b) (7)(F)

(b) (7)(F)

8.0 VULNERABILITY ANALYSIS, CONTINUED

VULNERABILITY ANALYSIS (DETAILED)
Residential Areas:
High residential population density within the 5-mile planning distance, however, residential areas are not located downstream of the facility or along the Arthur Kill. The closest residential areas are located adjacent to the western and southern sides of the facility. Although a discharge is not expected to flow towards these residences, they may be within the evacuation zone for a worst-case discharge or other significant incident. The Company will work closely with local, county, and state emergency agencies (police, fire, etc.) to coordinate response actions for residential areas that may be impacted by a discharge. Additional information on residential areas in the vicinity of the facility is in the Environmental Sensitivity Index Maps in SECTION 6.8.

8.0 VULNERABILITY ANALYSIS, CONTINUED

VULNERABILITY ANALYSIS (DETAILED)
Businesses:

The Terminal is located within a heavily industrialized area and there are numerous businesses within the 5-mile planning distance. Kinder Morgan is located to the northeast of the terminal and the dock lines between the terminal and the dock run along the southern side of Kinder Morgan. Other businesses are located in close proximity to the Terminal and along Arthur Kill.

Depending upon product released and the actual or anticipated extent of impacts, evacuation of these businesses may be required or these businesses may be disrupted by response activities. In addition to the businesses along the Arthur Kill River, other businesses in the vicinity of the facility may be disrupted by a release or response activities.

The Company will work closely with local, county, and state emergency agencies (police, fire, etc.) to coordinate response actions for businesses that may be impacted by a discharge.

8.0 VULNERABILITY ANALYSIS, CONTINUED

VULNERABILITY ANALYSIS (DETAILED)

Wetlands or Other Sensitive Environments:

Natural heritage resources identified within the 5-mile planning distance of the Terminal include wetlands; freshwater marshes and swamps; submerged aquatic vegetation beds; threatened and endangered plant and wildlife species; fish spawning and nursery areas; and waterfowl staging and concentration areas. Environmental areas designated under the Shoreline Protection and Management Act are all along the Arthur Kill on both banks in different areas. A release of petroleum product from the Terminal to the river could have a significant impact on these areas. The degree and area of impact would depend upon the extent and migration of the spill.

Specific designated areas along Arthur Kill include:
- Isle of Meadows located approximately 1 mile south of the terminal dock.
- Meredith Woods located approximately 1 mile north of the terminal dock.
- Pralls Island and Saw Mill Creek Marsh are located approximately 1-1/2 miles north of the terminal dock.
- Sharrots Shoreline located approximately 3 miles south of the terminal dock.

During a response situation the USFWS and applicable state agencies should be contacted for information regarding wetlands and other sensitive environments. Upon contact the agencies will be able to:

Identify and establish priorities for fish and wildlife, wetlands, and other sensitive environments requiring protection from any direct or indirect effects from a discharge.

Identify potential environmental effects on fish and wildlife, wetlands, and other sensitive environments resulting from removal actions or countermeasures.

The Port of New York and New Jersey Area Contingency Plan (ACP) and the Environmental Sensitivity Index maps in Section 6.8 will also be used to further identify sensitive areas. There are no wellhead protection zones for public water supplies established by the municipality within one mile of the terminal.

8.0 VULNERABILITY ANALYSIS, CONTINUED

VULNERABILITY ANALYSIS (DETAILED)
Fish and Wildlife:
Natural heritage resources identified in the vicinity of the Terminal include wetlands; freshwater marshes and swamps; submerged aquatic vegetation beds; threatened and endangered plant and wildlife species; fish spawning and nursery areas; and waterfowl staging and concentration areas. Environmental areas designated under the Shoreline Protection and Management Act are all along the Arthur Kill on both banks in different areas. A release of petroleum product from the Terminal to the river could have a significant impact on these areas. The degree and area of impact would depend upon the extent and migration of the spill. During a response situation the USFWS and applicable state agencies should be contacted for information regarding wetlands and other sensitive environments. Upon contact the agencies will be able to: Identify and establish priorities for fish and wildlife, wetlands, and other sensitive environments requiring protection from any direct or indirect effects from a discharge. Identify potential environmental effects on fish and wildlife, wetlands, and other sensitive environments resulting from removal actions or countermeasures. The USCG New York Area Contingency Plan (ACP) will also be used to further identify sensitive areas. There are no wellhead protection zones for public water supplies established by the municipality within one mile of the terminal.

8.0 VULNERABILITY ANALYSIS, CONTINUED

VULNERABILITY ANALYSIS (DETAILED)
Lakes and Streams:
The closest waterway is the Arthur Kill. The BP Products Terminal is located on the Arthur Kill just South of The Rahway River on the West bank, approximately 8 miles from the Kill Van Kull (KV) Buoy to Carteret Terminal. Other streams and rivers enter Arthur Kill as shown on the Environmental Sensitivity maps in Section 6.8.

8.0 VULNERABILITY ANALYSIS, CONTINUED

VULNERABILITY ANALYSIS (DETAILED)
Endangered Flora and Fauna:
See SECTION 6.6 for a list of endangered and threatened species by state. The endangered flora and fauna that may be potentially impacted by a discharge originating

at the Facility have been identified as either wetlands or surrounding creeks and shall be protected as noted. USFWS and applicable state agencies will be contacted for information regarding endangered species.

8.0 VULNERABILITY ANALYSIS, CONTINUED

VULNERABILITY ANALYSIS (DETAILED)
Recreational Areas:
There are several recreational areas (i.e., marinas and parks) along Arthur Kill within the 5-mile planning distance. Specific recreational areas along Arthur Kill include: - Carteret Pier and Waterfront Park located approximately 1 mile soutth of the terminal dock. - Arthur Kill Park located approximately 5 miles north of the terminal dock. - Sewarn Marina Park and Captain Carlson Park located approximately 3 miles south of the terminal dock. - Raritan Yacht Club, Tottenville Shore Park, and Conference House Park located approximately 5 miles south of the terminal dock. Depending upon product released and the actual or anticipated extent of impacts, evacuation of these areas may be required or these areas may be disrupted by response activities. The Company will work closely with local, county, and state emergency agencies (police, fire, etc.) to coordinate response actions for businesses that may be impacted by a discharge.

(b) (7)(F)

[redacted]

(b) (7)(F)

[redacted]

8.0 VULNERABILITY ANALYSIS, CONTINUED

VULNERABILITY ANALYSIS (DETAILED)
Other Applicable Areas:
The Arthur Kill flows into the Lower New York Bay and eventually into Atlantic Ocean, this is tidal river which in the flood stage moves into New Jersey and New York area. The River is an economic resource for the city and surrounding area. Marinas and boat launch areas are located through out the River. In the event of a release from the Terminal, any nearby economically important areas could be negatively impacted. As described below, response actions will focus on preventing spilled material from reaching economically important areas. In the event of a spill or other emergency event which could have the likelihood of affecting any of the above referenced locations, at a minimum the following steps would be taken: 1) The appropriate public-emergency response-public health facilities/entities would be notified. 2) For a facility/residence/business etc. which is occupied, appropriate emergency response/public health entities would be advised to warn these facilities, and recommend evacuation as necessary. 3) In the case of an environmentally sensitive area, the proper public agencies are advised, and recommended to take proper protective actions.

9.0 TERMINAL SENSITIVITY MAPS

Click here for Map 7

9.0 TERMINAL SENSITIVITY MAPS, CONTINUED

Click here for Map 8

9.0 TERMINAL SENSITIVITY MAPS, CONTINUED

Click here for Maps 9a and 9b

9.0 TERMINAL SENSITIVITY MAPS, CONTINUED

Click here for Map 11

9.0 TERMINAL SENSITIVITY MAPS, CONTINUED

Click here for Map 12

10.0 ERAP Cross-References

EPA FRP REQUIREMENTS	LOCATION
Emergency Response Action Plan (ERAP) (sec. 1.1)	
Separate Section of FRP	ERAP
Qualified Individual (QI) Information (sec. 1.2) partial	ERAP - Figure 3-3
Emergency Notification Phone List (sec. 1.3.1) partial	ERAP - Figure 3-3, Figure 3-3
Spill Response Notification Form (sec. 1.3.1) partial	ERAP - Figure 3-2
Response Equipment List and Location (sec. 1.3.2) complete	ERAP - Figure 5-2, Figure 5-3
Response Equipment Testing and Deployment (sec. 1.3.3) complete	ERAP - Figure 5-4
Facility Response Team List (sec. 1.3.4) partial	ERAP - Figure 3-3
Evacuation Plan (sec. 1.3.5) condensed	ERAP - Section 2.11, Section 2.11.1
Immediate Actions (sec. 1.7.1) complete	ERAP - Section 2.0
Facility Diagrams (sec. 1.9) complete	ERAP - Figure 6-1, Figure 6-2, Figure 6-3

RECORD OF CHANGES

Changes to this Plan will be documented on this page. Plan review and modifications will be initiated and coordinated by the Business Unit Health, Safety, Security & Environmental (HSS&E) in conjunction with the Area Supervisor/Manager of Operations.

DATE OF CHANGE	DESCRIPTION OF CHANGE	PAGE NUMBER

5/20/2010	ERAP | 1.0 Introduction | 1.3 Facility Description	
9/28/2010	16 - ERAP | 1.0 Introduction | 1.3 Facility Description	
9/29/2010	16 - ERAP | 1.0 Introduction | 1.3 Facility Description	
3/31/2011	16 - ERAP | 1.0 Introduction | 1.3 Facility Description	
10/4/2011	16 - ERAP | 8.0 Vulnerability Analysis (Detailed)	
10/4/2011	16 - ERAP | 3.0 Notifications | Figure 3-3 - External Notifications and Telephone Numbers	
10/4/2011	16 - ERAP | 5.0 Resources | Figure 5-3 - Regional Company and Response Contractor's Equipment List / Response Time	
10/4/2011	16 - ERAP | 6.0 Plot Plans / Tank Table | Figure 6-3 - Evacuation Diagram	
10/4/2011	16 - ERAP | 6.0 Plot Plans / Tank Table | Figure 6-3 - Evacuation Diagram	
10/5/2011	16 - ERAP | 3.0 Notifications | Figure 3-2 - Internal Notification and Telephone Numbers	
10/5/2011	16 - ERAP | 1.0 Introduction | Figure 1-1 - Facility Area Map	
10/12/2011	16 - ERAP | 3.0 Notifications | Figure 3-2 - Internal Notification and Telephone Numbers	
1/3/2012	16 - ERAP | 3.0 Notifications | Figure 3-3 - External Notifications and Telephone Numbers	
1/3/2012	16 - ERAP | 5.0 Resources | Figure 5-3 - Regional Company and Response Contractor's Equipment List / Response Time	
3/19/2012	16 - ERAP | 3.0 Notifications | Figure 3-3 - Internal Notification and Telephone Numbers	
3/19/2012	16 - ERAP | 3.0 Notifications | Figure 3-4 - External Notifications and Telephone Numbers	
3/19/2012	16 - ERAP | 5.0 Resources | Figure 5-3 - Regional Company and Response Contractor's Equipment List / Response Time	
3/19/2012	16 - ERAP | 3.0 Notifications | Figure 3-4 - External Notifications and Telephone Numbers	
3/19/2012	16 - ERAP | 5.0 Resources | Figure 5-2 - Facility Equipment	
3/19/2012	16 - ERAP | 2.0 Response Steps | 2.12.1 Evacuation Factors	

RECORD OF CHANGES

Changes to this Plan will be documented on this page. Plan review and modifications will be initiated and coordinated by the Business Unit Health, Safety, Security & Environmental (HSS&E) in conjunction with the Area Supervisor/Manager of Operations.

DATE OF CHANGE	DESCRIPTION OF CHANGE	PAGE NUMBER
3/19/2012	16 - ERAP | 8.0 Vulnerability Analysis (Detailed)	

3/20/2012	16 - ERAP | 6.0 Plot Plans / Tank Table | Figure 6-3 - Evacuation Diagram	
3/20/2012	16 - ERAP | 1.0 Introduction | 1.3 Facility Description	
4/17/2012	16 - ERAP | 3.0 Notifications | Figure 3-3 - Internal Notification and Telephone Numbers	
4/17/2012	16 - ERAP | 3.0 Notifications | Figure 3-3 - Internal Notification and Telephone Numbers	
5/24/2012	16 - ERAP | 3.0 Notifications | Figure 3-3 - Internal Notification and Telephone Numbers	
5/24/2012	16 - ERAP | 3.0 Notifications | Figure 3-3 - Internal Notification and Telephone Numbers	
5/24/2012	16 - ERAP | 5.0 Resources | Figure 5-2 - Facility Equipment	
5/24/2012	16 - ERAP | 1.0 Introduction | 1.3 Facility Description	
5/24/2012	16 - ERAP | 6.0 Plot Plans / Tank Table | Figure 6-3 - Evacuation Diagram	
6/4/2012	16 - ERAP | 3.0 Notifications | Figure 3-3 - Internal Notification and Telephone Numbers	
6/4/2012	16 - ERAP | 1.0 Introduction | 1.3 Facility Description	
6/4/2012	16 - ERAP | 1.0 Introduction | 1.3 Facility Description	
6/8/2012	16 - ERAP | 3.0 Notifications | Figure 3-3 - Internal Notification and Telephone Numbers	
7/11/2012	16 - ERAP | 1.0 Introduction | 1.3 Facility Description	
7/23/2012	16 - ERAP | 1.0 Introduction | 1.3 Facility Description	
7/23/2012	16 - ERAP | 3.0 Notifications | Figure 3-3 - Internal Notification and Telephone Numbers	
7/24/2012	16 - ERAP | 3.0 Notifications | Figure 3-4 - External Notifications and Telephone Numbers	
7/24/2012	16 - ERAP | 1.0 Introduction | 1.3 Facility Description	
7/24/2012	16 - ERAP | 3.0 Notifications | Figure 3-4 - External Notifications and Telephone Numbers	

RECORD OF CHANGES

Changes to this Plan will be documented on this page. Plan review and modifications will be initiated and coordinated by the Business Unit Health, Safety, Security & Environmental (HSS&E) in conjunction with the Area Supervisor/Manager of Operations.

DATE OF CHANGE	DESCRIPTION OF CHANGE	PAGE NUMBER
7/24/2012	16 - ERAP | 3.0 Notifications | Figure 3-4 - External Notifications and Telephone Numbers	
7/24/2012	16 - ERAP | 5.0 Resources | Figure 5-2 - Facility Equipment	
8/3/2012	16 - ERAP | 3.0 Notifications | Figure 3-4 - External	

	Notifications and Telephone Numbers	
9/12/2012	16 - ERAP | 3.0 Notifications | Figure 3-3 - Internal Notification and Telephone Numbers	
9/12/2012	16 - ERAP | 6.0 Plot Plans / Tank Table | Figure 6-3 - Evacuation Diagram	
9/17/2012	16 - ERAP | 6.0 Plot Plans / Tank Table | Figure 6-1 - Facility Site Plan	
9/17/2012	16 - ERAP | 6.0 Plot Plans / Tank Table | Figure 6-2 - Drainage Diagram	
10/17/2012	16 - ERAP | 1.0 Introduction | Figure 1-1 - Facility Area Map	
10/17/2012	16 - ERAP | 6.0 Plot Plans / Tank Table | Figure 6-1 - Facility Site Plan	
10/17/2012	16 - ERAP | 6.0 Plot Plans / Tank Table | Figure 6-2 - Drainage Diagram	
11/12/2012	16 - ERAP | 1.0 Introduction | 1.3 Facility Description	
11/12/2012	16 - ERAP | 3.0 Notifications | Figure 3-3 - Internal Notification and Telephone Numbers	
11/15/2012	16 - ERAP | 3.0 Notifications | Figure 3-4 - External Notifications and Telephone Numbers	

LINK FILES

TECHNICAL RESPONSE PLANNING CORPORATION

1995 ✧ 2005
10 YEARS OF EXCELLENCE

December 29, 2008

U.S. EPA Region II (MS211) FRP Coordinator
Attn: Doug Kodama
2890 Woodbridge Ave., Building 209
Edison, NJ 08837-3679

RE: Facility Response Plan for the BP Products, U.S. Terminals & Distribution Carteret Terminal (EPA FRP # NY-036)

Dear FRP Coordinator:

Enclosed is a copy of the updated BP Carteret Terminal Facility Response Plan for your review and approval. Please direct all questions and correspondence to David V. Aparisio (Terminal Manager) at 760 Roosevelt Avenue Carteret, NJ 07008 or (718) 389-5966.

Sincerely,
TECHNICAL RESPONSE PLANNING CORPORATION

Greg Desmond
Senior Project Manager

Federal Express

8203 Willow Place South Suite 160 | Houston, Texas 77070 | Office: (281) 955-9600 | Fax: (281) 955-0369 | E-mail: info@trpcorp.com |Internet:www.trpcorp.com

TECHNICAL RESPONSE PLANNING CORPORATION

1995 ✧ 2005
10 YEARS OF EXCELLENCE

December 29, 2008

U.S. Coast Guard – Commander Coast Guard Activities
New York Preparedness Section
212 Coast Guard Drive
Staten Island, NY 10305

RE: Facility Response Plan for the BP Products, U.S. Terminals & Distribution Carteret Terminal (USCG FRP # NY-036 / KIBOF018)

Dear Sir:

Enclosed are two copies of the BP Facility Response Plan for your review and approval. In accordance with 33 CFR 154.110, BP submits this letter of intent to continue oil transfer operations at the following facility

Carteret Terminal
760 Roosevelt Avenue
Carteret, NJ 07008
(732) 541-5131
Latitude 40° 35' 28" North, Longitude 74° 12' 28" West

To follow up the support of this request, enclosed please find the following:

1. Two copies of the aforementioned plan for review,
2. One paper copy of the Letter of Intent for your stamp of approval process,
3. A Response Plan Cover Sheet and
4. A Table of Regulation Cross-References.

Document number 3 & 4 are also located in Appendix E of the plan.

Technical Response Planning Corporation (TRP) prepared these plans on behalf of BP. Please direct all questions and correspondence to David V. Aparisio (Terminal Manager) at 760 Roosevelt Avenue Carteret, NJ 07008 or (718) 389-5966.

Sincerely,
TECHNICAL RESPONSE PLANNING CORPORATION

Greg Desmond
Senior Project Manager

Federal Express

8203 Willow Place South Suite 160 | Houston, Texas 77070 | Office: (281) 955-9600 | Fax: (281) 955-0369 | E-mail: info@trpcorp.com |Internet:www.trpcorp.com

TECHNICAL RESPONSE PLANNING CORPORATION

1995 ✧ 2005
10 YEARS OF EXCELLENCE

December 29, 2008

David V. Aparisio
BP Carteret Terminal
760 Roosevelt Avenue
Carteret, NJ 07008

RE: Facility Response Plan for the BP Products, U.S. Terminals & Distribution Carteret Terminal (EPA FRP # NY-036)

Dear Mr. Aparisio:

Enclosed is a copy of the updated BP Carteret Terminal Facility Response Plan for your use. A copy of this plan has also been submitted to the EPA and USCG for review and approval. The EPA and USCG will supply correspondence about approval or requested revisions to the Terminal. It is imperative that any correspondence from the EPA or USCG be supplied immediately to TRP to address any additional requests or post the approval. If you have any questions please contact me at (281) 955-9600 ext. 115 or e-mail gdesmond@trpcorp.com.

Sincerely,
TECHNICAL RESPONSE PLANNING CORPORATION

Greg Desmond
Senior Project Manager

Federal Express

8203 Willow Place South Suite 160 | Houston, Texas 77070 | Office: (281) 955-9600 | Fax: (281) 955-0369 | E-mail: info@trpcorp.com |Internet:www.trpcorp.com

TECHNICAL RESPONSE PLANNING CORPORATION
QUALITY SERVICES SINCE 1995

October 1, 2010

Melanie Barber
U.S. Department of Transportation
Office of Pipeline Safety
1200 New Jersey Avenue, S.E.
Room 22-210
Washington, D.C. 20590

RE: PHMSA Sequence Number – 1713 BP Products, U.S. Terminals & Distribution Carteret Oil Spill Response Plan

Dear Ms. Barber:

Enclosed are two CD's of the updated BP Carteret Terminal Oil Spill Response Plan for your review and approval. Please direct all questions and correspondence to David V. Aparisio (Terminal Manager) at 760 Roosevelt Avenue Carteret, NJ 07008 or (718) 389-5966.

Sincerely,
TECHNICAL RESPONSE PLANNING CORPORATION

Greg Desmond
Senior Project Manager

Enclosures
Federal Express

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

OPS Sequence Number: 1713
Facility Response Plan Version Date:
November 2010
Pipeline Operator Name:
BP Products U.S. Logistics
Contact Name:
Robert J. Knanishu
Contact Office, Fax, and Cellular Telephone Numbers:
(630) 836-3582 - Work Fax
(630) 836-3498 - Work
(630) 605-2157 - Mobile
Contact Mailing Address:
28100 Torch Parkway
Warrenville, IL 60555
Contact Electronic Mail Address:
Rob.Knanishu@bp.com
If different from the Contact Name, Facility Response Plan Author Name:
Greg Desmond
Facility Response Plan Author Office, Fax, and Cellular Phone Numbers:
281-955-9600 ext 115 (Office)
281-955-0369 (fax)
None (mobile)
Facility Response Plan Author Mailing Address:
9720 Cypresswood Drive Suite 340
Houston, TX 77070
Facility Response Plan Author Electronic Mail Address:
gdesmond@trpcorp.com
Date of Review:
November 2010

National Contingency Plan and Area Contingency Plan Certifications

For Sequence Number: 1713

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1. A. Has the operator reviewed the National Contingency Plan (NCP) and each applicable Area Contingency Plan (ACP)? B. Does the Facility Response Plan follow the Area Contingency Plans? C. Please list the names of the Area Contingency Plans and the pages in the Facility Response Plan that relate to the Area Contingency Plans. (49 CFR 194.107(b)) **Yes, the operator has reviewed the National Contingency Plan (NCP) and applicable Area Contingency Plan (ACP). The Facility Response Plan also follows the Area Contingency Plans, EPA Region lV Regional Contingency Plan EPA Region III Regional Contingency Plan. A list of the Area Contingency Plans can be found in the Facility Response Plan in Section 1.1 on page 1-11.**

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

Comment:

Recommendation:

Plan Information Summary

For Sequence Number: 1713

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

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

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

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

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

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

- Name(s), title(s), and office and cellular telephone number(s) for the Qualified Individual(s) twenty-four hours a day in each response zone. **Yes, the name(s), title(s), and office and cellular telephone number(s) for the Qualified Individual(s) twenty-four hours a day in each response zone can be found in the Facility Response Plan in Figure 1-2 on page 1-4 and below:**

Name and Contact Information	Work Address	(b) (7)(F) [redacted]
David V. Aparisio Terminal Manager Incident Commander (718) 389-5966 x605 (Office) (b) (6) [redacted] (914) 490-7204 (Mobile)	125 Apollo Street Brooklyn, NY 11222	(b) (6) [redacted]

- Name(s), title(s), and office and cellular telephone number(s) for the Alternate Qualified Individual(s) twenty-four hours a day in each response zone **Yes, the name(s), title(s), and office and cellular telephone number(s) for the Alternate Qualified Individual(s) twenty-four hours a day in each response zone can be found in Figure 1-2 on page 1-4 and below:**

Name and Contact Information	Work Address	Home Address
Tim Hayes District Operations Manager (732) 541-5131 x609 (Office) (b) (6) (609) 751-3275 (Mobile)	760 Roosevelt Ave. Carteret, NJ 07008	(b) (6)
Business Unit		
Name and Contact Information	**Work Address**	**Home Address**
Tim Hayes District Operations Manager (732) 541-5131 x609 (Office) (b) (6) (609) 751-3275 (Mobile)	760 Roosevelt Ave. Carteret, NJ 07008	(b) (6)

List of line sections in each response zone by milepost, survey station number, or other operator designation **Yes, a list of line sections in each response zone by milepost, survey station number, or other operator designation can be found in the Facility Response Plan in Figure 1-2 on page 1-5.**

- If any response zone contains multiple pipeline systems, all pipeline systems are described and the oils they transport are listed **Yes, the response zone contains multiple systems. Refer to the Facility Response Plan in Figure 1-2 on page 1-5.**

- The type of oil and the volume of the worst-case discharge in each response zone? **Yes, the type of oil and the volume of the worst-case discharge in each response zone can be found in the Facility Response Plan in Figure 1-2 on page 5 and below:**

(b) (7)(F)

(b) (7)(F) [redacted]

[redacted]

[redacted]

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

Comment:

Recommendation:

Notifications

For Sequence Number: 1713

3.1 What person, position, or facility is responsible for starting immediate notification? (49 CFR 194.107(c)(1)(ii)) Please list the person's, position's, or facility's mailing and electronic mail addresses and office, fax, and cellular telephone information. **Yes, the person, position, or facility that is responsible for starting immediate notification, including mailing and electronic mail addresses and office, fax, and cellular telephone information can be found in the Facility Response Plan in Figure 1-2 on page 1-4 and in Section 3.1 on page 1-2.**

Page Reference: **Figure 1-3 – Carteret Information Summary** and **Section 3.1 Emergency Information and Notification Procedures**

Comment:

Recommendation:

3.2 Is the person, position, or facility capable of starting immediate notification twenty-four hours a day, three hundred sixty-five days a year? (49 CFR 194.107(c)(1)(ii)) Please describe your immediate notification plan. **Yes, the person, position, or facility is capable of starting immediate notification twenty-four hours a day, three hundred sixty-five days a year. Refer to the Facility Response Plan in Section 3.1 on page 3-2 and in Figure 3.1-3 on pages 3-6 through 3-9 for a description of the immediate notification plan.**

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

Comment:

Recommendation:

3.3 Do the Facility Response Plan notification procedures include telephone numbers so that the qualified individual(s) and oil spill removal organization(s) can be reached twenty-four hours a day, three hundred sixty-five days a year? (49 CFR 194.107(b)(1) and (2), 194.107(c)(1)(ii) and 194.113(b)(2)) **Yes, the Facility Response Plan notification procedures include telephone numbers so that the qualified individual(s) and oil spill removal organization(s) can be reached twenty-four hours a day, three hundred sixty-five days a year. Refer to the Facility Response Plan in Figure 3.1-3 on pages 3-6 through 3-9 and in Figure 3.1-4 page 3-11.**

- Qualified Individual(s)? : **Yes, qualified individual(s) information can be found in the Facility Response Plan in Figure 3.1-3 on pages 3-6 through 3-9.**

- Oil Spill Removal Organization(s)? : **Yes, Oil Spill Removal Organization(s) can be found in the Facility Response Plan in Figure 3.1-4 on page 3-11.**

- Are the National Response Center numbers correctly listed as 1-800-424-8802 and 202-267-2675 in the plan? : **Yes, the National Response Center numbers are correctly listed as 1-800-424-8802 and 202-267-2675 in the Facility Response Plan. Refer to the Facility Response Plan in Figure 3.1-4 on page 3-10.**

- Company personnel? : **Yes, Company personnel information can be found in the Facility Response Plan in Figure 3.1-4 on pages 3-9 through 3-11.**

Page Reference: **Figure 3.1-3 - Internal Notifications and Telephone Numbers** and **Figure 3.1-4 - External Notifications and Telephone Numbers**

Comment:

Recommendation:

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

- Name of pipeline operator? : **Yes, the name of the pipeline operator can be found in the Facility Response Plan in Figure 3.1-2 on page 3-4.**

- Time of discharge? : **Yes, the time of discharge can be found in the Facility Response Plan in Figure 3.1-2 on page 3-4.**

- Location of discharge? : **Yes, the location of discharge can be found in the Facility Response Plan in Figure 3.1-2 on page 3-4.**

- Name of oil involved? : **Yes, the name of the oil involved can be found in the Facility Response Plan in Figure 3.1-2 on page 3-4.**

- Reason for discharge? : **Yes, the reason for discharge can be found in the Facility Response Plan in Figure 3.1-2 on page 3-4.**

- Estimated volume of oil discharged? : **Yes, the estimated volume of oil discharged can be found in the Facility Response Plan in Figure 3.1-2 on page 3-4.**

- Weather conditions on scene? : **Yes, the weather conditions on scene can be found in the Facility Response Plan in Figure 3.1-2 on page 3-4.**

Page Reference: **Figure 3.1-2 - Spill / Incident Telephonic Notice**

Comment:

Recommendation:

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

- Name(s)? : **Yes, the Facility Response Plan provides the name(s) of the operator's oil spill removal organization(s) in Section B.1.1 on page B-2.**

- Address(es)? : **Yes, the Facility Response Plan provides the address(es) of the operator's oil spill removal organization(s) in Section B.1.1 on page B-2.**

- Telephone Number(s)? : **Yes, the Facility Response Plan provides the telephone number(s) of the operator's oil spill removal organization(s) in Figure 3.1-4 on pages 3-11.**

Page Reference: **Appendix B.1.1 OSRO Classification** and **Figure 3.1-4 – External Notifications and Telephone Numbers**

Comment:

Recommendation:

Spill Detection and Mitigation Procedures
For Sequence Number: 1713

4.1 Does the Facility Response Plan contain procedures to name and mitigate or prevent a substantial threat of a worst-case discharge? (49 CFR 194.107(a) and (b)(2)(i)) **Yes, the Facility Response Plan contains procedures to name and mitigate or prevent a substantial threat of a worst-case discharge in Section D.5.2 on pages D-17 through D-20.**

Page Reference: **Appendix D.5.2 Worst Case Discharge (WCD) Scenario Discussion**

Comment:

Recommendation:

4.2 Does the Facility Response Plan name personnel, equipment, and procedures for detecting leaks and spills and locating spills throughout the response zone? (49 CFR 194.107(c)(1)(iii)): **Yes, the Facility Response Plan names personnel, equipment, and procedures for detecting leaks and spills and locating spills throughout the response zone in Section 2.1.1 on page 2-9 and in Section D.3 on pages D-3 through D-7.**

Page Reference: **Section 2.1.1 Spill Detection and Mitigation Procedures** and **Appendix D.3 Spill Detection / Prevention Inspection**

Comment:

Recommendation:

4.3 Does the Facility Response Plan name the maximum time to detect the spill and shut down flow in affected pipeline(s) in bad weather? (49 CFR 194.105(b)(1)): **Yes, the Facility Response Plan names the maximum time to detect the spill and shut down flow in affected pipeline(s) in bad weather in Section D.7.3 on pages D-27 through D-30.**

Page Reference: **Appendix D.7.3 DOT / PHMSA Portion of Pipeline / Facility**

Comment:

Recommendation:

4.4 Does the Facility Response Plan have procedures to mitigate spills appropriate for the response zone(s) and consistent with applicable Area Contingency Plan(s)? (49 CFR 194.107(b)(2)(i), and (c)(1)(iii) and (v)) **Yes, the Facility Response Plan has procedures to mitigate spills appropriate for the response zone(s) and is consistent with applicable Area Contingency Plan(s). Refer to the Facility Response Plan in Section 2.1.1 on page 2-9 and in Section D.3 on pages D-3 through D-7.**

Page Reference: **Section 2.1.1 Spill Detection and Mitigation Procedures** and **Appendix D.3 Spill Detection / Prevention Inspection**

Comment:

Recommendation:

Spill Containment

For Sequence Number: 1713

5.1 Does the Facility Response Plan name spill containment strategies appropriate for the response zone(s) and consistent with applicable Area Contingency Plans? (49 CFR 194.107(b)(1)(iii), (b)(2)(i), and (c)(1)(v)) **Yes, the Facility Response Plan names spill containment strategies appropriate for the response zone(s) and it is consistent with applicable Area Contingency Plans. Refer to the Facility Response Plan in Section 6.2 on pages 6-2 through 6-6.**

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

Comment:

Recommendation:

5.2 Can planned spill containment activities be accomplished within the appropriate tier times? (49 CFR 194.107(b)(2)(i) and (c)(1)(v), and 194.115) **Yes, planned spill containment activities can be accomplished within the appropriate tier times. Refer to the Facility Response Plan in Section 6.2 on pages 6-2 through 6-6, in Section 7.1.2 on page 7-6, and in Section B.1.1 on page B-2.**

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

Comment:

Recommendation:

5.3 Are containment equipment capacities described in sufficient detail and does the Facility Response Plan identify enough spill containment equipment to respond to a worst-case discharge to the maximum extent practicable? (49 CFR 194.107(b)(2)(i) and (c)(1)(v), and 194.115) **Yes, containment equipment capacities are described in sufficient detail and the Facility Response Plan identifies enough spill containment equipment to respond to a worst-case discharge to the maximum extent practicable. Refer to the Facility Response Plan in Section 7.1.1 on page 7-2, in Figure 7.1-1 on pages 7-3 through 7-4, and in Section B on pages B-1 through B-3.**

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

Comment:

Recommendation:

Spill Recovery

For Sequence Number: 1713

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

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

Comment:

Recommendation:

6.2 Can planned spill recovery activities be accomplished within the appropriate tier times?
5.4 (49 CFR 194.107(b)(2)(i) and(c)(1)(v), and 194.115) **Yes, planned spill recovery activities can be accomplished within the appropriate tier times. Refer to the Facility Response Plan in Section 6.2 on pages 6-2 through 6-6, in Section 7.1.2 on page 7-6, and in Section B.1.1 on page B-2.**

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

Comment:

Recommendation:

6.3 Are recovery equipment capacities described in sufficient detail and does the Facility Response Plan identify sufficient spill recovery equipment to respond to a worst-case discharge to the maximum extent practicable? (49 CFR 194.107(b)(2)(i) and (c)(1)(v), and 194.115) **Yes, recovery equipment capacities are described in sufficient detail and the Facility Response Plan identifies sufficient spill recovery equipment to respond to a worst-case discharge to the maximum extent practicable. Refer to the Facility Response Plan in Section 7.1.1 on pages 7-3 through 7-4, in Figure 7.1-1 on page 7-5, and in Section B on pages B-1 through B-3.**

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

Comment:

Recommendation:

Disposal
For Sequence Number: 1713

7.1 Does the Facility Response Plan identify disposal procedures, including temporary storage equipment for recovered oil appropriate for the response zone and consistent with applicable Area Contingency Plans? (49 CFR 194.107(b)(1)(iii), (b)(2)(i), and (c)(1)(v)) **Yes, the Facility Response Plan identifies disposal procedures, including temporary storage equipment for recovered oil appropriate for the response zone and is consistent with applicable Area Contingency Plans. Refer to the Facility Response Plan in Section 5.5 on pages 5-39 through 5-40 and in Section 7.3 on pages 7-12 through 7-16.**

Page Reference: **Section 5.5 Disposal Plan** and **Section 7.3 Waste Management**

Comment:

Recommendation:

7.2 Can planned temporary storage and waste disposal activities be accomplished within the appropriate tier times? (49 CFR 194.107(b)(2)(i) and (c)(1)(v), and 194.115) **Yes, planned temporary storage and waste disposal activities can be accomplished within the appropriate tier times. Refer to the Facility Response Plan in Section 7.3 on pages 7-12 through 7-16 and in Section B.1.1 on page B-2.**

Page Reference: **Section 7.3 Waste Management** and **Appendix B.1.1 OSRO Classification**

Comment:

Recommendation:

7.3 Does the Facility Response Plan identify sufficient temporary storage capabilities to respond to a worst-case discharge to the maximum extent practicable? (49 CFR 194.107(b)(2)(i) and (c)(1)(v), and 194.115) **Yes, the Facility Response Plan identifies sufficient temporary storage capabilities to respond to a worst-case discharge to the maximum extent practicable in Figure 7.3-3 on page 7-15.**

Page Reference: **Figure 7.3-3 - Temporary Storage Methods**

Comment:

Recommendation:

Sensitive Area Protection
For Sequence Number: 1713

8.1 Does the Facility Response Plan identify the protection strategies appropriate for the response zone and consistent with applicable Area Contingency Plans? (49 CFR 194.107(b)(1)(iii), (b)(2)(i) and (ii), and (c)(1)(v)) **Yes, the Facility Response Plan identifies the protection strategies appropriate for the response zone and is consistent with applicable Area Contingency Plans in Section 6.3 on pages 6-7 through 6-12 and in Section 6.4 on pages 6-13 through 6-15.**

Page Reference: **Section 6.3 Sensitive Area Protection** and **Section 6.4 Alternative Response Strategies**

Comment:

Recommendation:

8.2 Can planned protection activities be accomplished within the appropriate tier times? (49 CFR 194.107(b)(2)(i) and (c)(1)(v), and 194.115) **Yes, planned protection activities can be accomplished within the appropriate tier times. Refer to the Facility Response Plan in Section 6.3 on pages 6-7 through 6-12, in Section 6.4 on pages 6-13 through 6-15, in Section 7.1.2 on page 7-6, and in Section B.1.1 on page B-2.**

Page Reference: **Section 6.3 Sensitive Area Protection**, **Section 6.4 Alternative Response Strategies**, **Section 7.1.2 Response Equipment Inspection and Maintenance**, and **Appendix B.1.1 OSRO Classification**

Comment:

Recommendation:

Response Management
For Sequence Number: 1713

9.1 Is the response management system described in the Facility Response Plan based on an Incident Command System? (49 CFR 194.107(b)(1)(i), (b)(2)(iii), and (c)(3)) **Yes, the response management system described in the Facility Response Plan is based on an Incident Command System. Refer to the Facility Response Plan in Figure 3.1-3 on pages 3-6 through 3-9 and in Section 4.2 on page 4-5.**

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

Comment:

Recommendation:

9.2 Does the operator's response organization describe roles and responsibilities for (49 CFR 194.107(b)(1)(i), (b)(2)(iii), and (c)(3))

- Qualified Individual? : **Yes, the roles and responsibilities for the Qualified Individual are described in the Facility Response Plan in Section 4.5 on pages 4-5 through 4-9.**

- Other operator response personnel including the spill management team? : **Yes, the roles and responsibilities for other operator response personnel including the spill management team, are described in the Facility Response Plan in Section 4.6 on pages 4-10 through 4-19.**

- Contracted Oil Spill Removal Organization(s)? : **Yes, the roles and responsibilities for contracted Oil Spill Removal Organization(s) are described in the Facility Response Plan in Section B on pages B-1 through B-3.**

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

Comment:

Recommendation:

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

- Oil Spill Removal Organization(s)? : **Yes, a description of how the operator works with the Unified Command and with responders, including Oil Spill Removal Organization(s), are described in the Facility Response Plan in Section 4.1.1 on page 4-2.**

- State and Local responders? : **Yes, a description of how the operator works with the Unified Command and with responders, including State and Local responders, are described in the Facility Response Plan in Section 4.4 on page 5 and in Section 4.6 on pages 4-10 through 4-11.**

- Federal On-Scene Coordinator? : **Yes, a description of how the operator works with the Unified Command and with responders, including Federal On-Scene Coordinator, are described in the Facility Response Plan in Section 4.4 on page 5 and in Section 4.6 on pages 4-10 through 4-11.**

Page Reference: **Section 4.1.1 Facility Response Team**, **Section 4.4 Incident Command System / Unified Command**, and **Section 4.6 Incident Management Team (IMT) Job Description Checklists**

Comment:

Recommendation:

Communications, Response Equipment and Transportation
For Sequence Number: 1713

10.1 Does the Facility Response Plan describe appropriate communications procedures and system(s) adequate for notifications and response operations? (49 CFR 194.107(c)(1)(ii) and (v)) **Yes, the Facility Response Plan describes appropriate communications procedures and system(s) adequate for notifications and response operations in Section 7.1.6 on pages 7-8 through 7-9.**

Page Reference: **Section 7.1.6 Communications Plan**

Comment:

Recommendation:

10.2 Does the Facility Response Plan identify response equipment that the operator owns and maintains? (49 CFR 194.107(c)(1)(v) and 194.115(a)) **Yes, the Facility Response Plan identifies response equipment that the operator owns and maintains in Section 7.1.1 on pages 7-3 through 7-4.**

Page Reference: **Section 7.1.1 Response Equipment**

Comment:

Recommendation:

10.3 Does the Facility Response Plan describe procedures for maintaining response equipment the operator owns? (49 CFR 194.107(c)(1)(viii)) **Yes, the Facility Response Plan describes procedures for maintaining response equipment the operator owns in Section 7.1.2 on page 7-6.**

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

Comment:

Recommendation

10.4 Does the Facility Response Plan identify Oil Spill Removal Organization(s)' response equipment when the U.S. Coast Guard has not classified the Oil Spill Removal Organization? (49 CFR 194.107(c)(1)(v) and 194.115(a)) **No, the Facility Response Plan does not identify Oil Spill Removal Organization(s)' response equipment when the U.S. Coast Guard has not classified the Oil Spill Removal Organization. The Facility does not utilize Oil Spill Response Organizations that are not classified by the U.S. Coast Guard.**

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

Comment: **The Facility does not utilize Oil Spill Response Organizations that are not classified by the U.S. Coast Guard.**

Recommendation:

10.5 Does the Facility Response Plan describe procedures for maintaining Oil Spill Removal Organization(s)' response equipment when the U.S. Coast Guard has not classified the Oil Spill Removal Organization? (49 CFR 194.107(c)(1)(viii)) **Yes, the Facility Response Plan describes procedures for maintaining Oil Spill Removal Organization(s)' response equipment when the U.S. Coast Guard has not classified the Oil Spill Removal Organization in Figure A.1-2 on page A-4.**

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

Comment:

Recommendation:

10.6 Does the Facility Response Plan identify location(s) for operator-owned and Oil Spill Removal Organization-owned response equipment? (49 CFR 194.115(b)) **Yes, the Facility Response Plan identifies location(s) for operator-owned and Oil Spill Removal Organization-owned response equipment in Section 7.1.1 on pages 7-3 through 7-4, in Figure 7.1-1 on page 7-5, and in Section B on pages B-1 through B-3.**

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

Comment:

Recommendation:

10.7 Does the Facility Response Plan describe mobilizing and deploying response equipment within the appropriate tier times consistent with the plan's response activities? (49 CFR 194.107(c)(1)(v) and 194.115(b)) **Yes, the Facility Response Plan describes mobilizing and deploying response equipment within the appropriate tier times consistent with the plan's response activities in Section 7.1.1 on pages 7-3 through 7-4, in Section 7.1.2 on page 7-6, and in Section B.1.1 on page B-2.**

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

Comment:

Recommendation:

10.8 Does the size of the response zone permit planned response activities, including equipment mobilization and deployment, within the appropriate tier times? (49 CFR 194.115(b)) **Yes, the size of the response zone permits planned response activities, including equipment mobilization and deployment, within the appropriate tier times. Refer to the Facility Response Plan in Section 7.1.1 on pages 7-3 through 7-4 and in Section B.1.1 on page B-2.**

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

Comment:

Recommendation:

Response Personnel and Mobilization
For Sequence Number: 1713

11.1 Does the Facility Response Plan identify enough trained personnel to respond to the worst-case discharge consistent with the Plan's response activities? (49 CFR 194.107(a), (c)(1)(v), and (c)(3), 194.115, and 194.117): **Yes, the Facility Response Plan identifies enough trained personnel to respond to the worst-case discharge consistent with the Plan's response activities. Refer to the Facility Response Plan in Figure 3.1-3 on pages 3-6 through 3-9 and in Section B on pages B-1 through B-3.**

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

Comment:

Recommendation:

11.2 Does the Facility Response Plan describe procedures for mobilizing and deploying response personnel throughout the response zone(s) consistent with the Plan's response activities? (49 CFR 194.107(b)(2)(i) and (c)(1)(v), and 194.115): **Yes, the Facility Response Plan describes procedures for mobilizing and deploying response personnel throughout the response zone(s) consistent with the Plan's response activities. Refer to the Facility Response Plan in Section 3.1 on page 3-2, in Figure 3.1-1 on page 3-3, in Section 4.2 on page 4-5, and in Figure 2-1 on pages 2-3 through 2-5.**

Page Reference: **Section 3.1 Emergency Information and Notification Procedures**, **Figure 3.1-1 - Emergency Notification Flow Chart**, **Section 4.2 Activation Procedures**, and **Figure 2-1 - Initial Response Action Guidelines**

Comment:

Recommendation:

Response Documentation and Worst Case Discharge
For Sequence Number: 1713

12.1 Does the operator describe procedures the response management organization must use to document response decisions, activities, and costs? (49 CFR 194.107(c)(3)) **Yes, the operator describes procedures the response management organization must use to document response decisions, activities, and costs in the Facility Response Plan in Section 5.1 on page 5-2.**

Page Reference: **Section 5.1 Documentation Procedures**

Comment:

Recommendation:

12.2 Does the Facility Response Plan provide the calculations and methodology used for determining the worst-case discharge for the response zone(s)? (49 CFR 194.105) **Yes, the Facility Response Plan provides the calculations and methodology used for determining the worst-case discharge for the response zone(s) in Section D.7.3 on pages D-27 through D-30.**

Page Reference: **Appendix D.7.3 DOT / PHMSA Portion of Pipeline / Facility**

Comment:

Recommendation:

12.3 Is the worst-case discharge volume calculated using the three specified methods in the Department of Transportation regulation? Are the calculations accurate and as prescribed? (49 CFR 194.105(b)) **Yes, the worst-case discharge volume is calculated using the three specified methods in the Department of Transportation regulation and the calculations are accurate and as prescribed. Refer to the Facility Response Plan in Section D.7.3 on pages D-27 through D-30.**

Page Reference: **Appendix D.7.3 DOT / PHMSA Portion of Pipeline / Facility**

Comment:

Recommendation:

Training: Program and Procedures
For Sequence Number: 1713

13.1 Does the Facility Response Plan describe a training program that teaches response personnel about the Plan and their responsibilities under the Plan? (49 CFR 194.107(b)(1)(ii), (c)(1)(vii) and (c)(3), and 194.117): **Yes, the Facility Response Plan describes a training program that teaches response personnel about the Plan and their responsibilities under the Plan in Section A.2 on pages A-10 through A-14.**

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

Comment:

Recommendation:

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

- Oil characteristics and hazards? : **Yes, the Facility Response Plan describes a training program that teaches response personnel about matters including oil characteristics and hazards in Figure A.2-2 on pages A-11 through A-13.**

- Conditions that are likely to worsen emergencies, including the consequences of facility malfunctions or failures and appropriate corrective actions? : **Yes, the Facility Response Plan describes a training program that teaches response personnel about matters including conditions that are likely to worsen emergencies, including the consequences of facility malfunctions or failures and appropriate corrective actions in Figure A.2-2 on pages A-11 through A-13.**

- Steps necessary to control an accidental discharge of oil? : **Yes, the Facility Response Plan describes a training program that teaches response personnel about matters including steps necessary to control an accidental discharge of oil in Figure A.2-2 on pages A-11 through A-13.**

- Steps necessary to minimize the potential for fire, explosion, or environmental damage? : **Yes, the Facility Response Plan describes a training program that teaches response personnel about matters including steps necessary to minimize the potential for fire, explosion, or environmental damage in Figure A.2-2 on pages A-11 through A-13.**

- Proper fire-fighting procedures and use of personal protective equipment? : **Yes, the Facility Response Plan describes a training program that teaches response personnel about matters including proper fire-fighting procedures and use of personal protective equipment in Figure A.2-2 on pages A-11 through A-13.**

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

Comment:

Recommendation:

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

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

Comment:

Recommendation:

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

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

Comment:

Recommendation:

Spill Response Drill Program

For Sequence Number: 1713

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

- Responsibility for planning, carrying out, and monitoring drills? : **Yes, the Facility Response Plan describes procedures for conducting internal and external drills that include responsibility for planning, carrying out, and monitoring drills in Section A.1 on page A-2.**

- Announced drills? : **Yes, the Facility Response Plan describes procedures for conducting internal and external drills that include announced drills in Figure A.1-2 on page A-4.**

- At least one unannounced internal drill? : **Yes, the Facility Response Plan describes procedures for conducting internal and external drills that include at least one unannounced internal drill in Figure A.1-2 on page A-4.**

- Quarterly Qualified Individual notifications drills? : **Yes, the Facility Response Plan describes procedures for conducting internal and external drills that include quarterly Qualified Individual notifications drills in Figure A.1-2 on page A-4.**

- Annual spill management team tabletop drills? : **Yes, the Facility Response Plan describes procedures for conducting internal and external drills that include annual spill management team tabletop drills in Figure A.1-2 on page A-4.**

- Annual Oil Spill Removal Organization(s) equipment deployment drills of representative types and amounts of key equipment in the Facility Response Plan? : **Yes, the Facility Response Plan describes procedures for conducting internal and external drills that include annual Oil Spill Removal Organization(s) equipment deployment drills of representative types and amounts of key equipment in the Facility Response Plan in Figure A.1-2 on page A-4.**

- At least one drill that tests the entire response plan for each response zone at least once every three years? : **Yes, the Facility Response Plan describes procedures for conducting internal and external drills that include at least one drill that tests the entire response plan for each response zone at least once every three years in Figure A.1-2 on page A-4.**

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

Comment:

Recommendation:

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

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

Comment:

Recommendation:

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

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

Comment:

Recommendation:

Response Plan Maintenance

For Sequence Number: 1713

15.1 Does the Facility Response Plan describe the requirements and procedures for the operator to (a) review the Facility Response Plans at least once every five years from the date the Office of Pipeline Safety approves the plan, (b) modify the Facility Response Plan to address new or different operating conditions or information in the Facility Response Plan, and (c) submit the plan for the Office of Pipeline Safety to review, require changes, and approve? (49 CFR 194.107(c)(1)(x) and 194.121(a)) **Yes, the Facility Response Plan describes the requirements and procedures for the operator to (a) review the Facility Response Plans at least once every five years from the date the Office of Pipeline Safety approves the plan, (b) modify the Facility Response Plan to address new or different operating conditions or information in the Facility Response Plan, and (c) submit the plan for the Office of Pipeline Safety to review, require changes, and approve in Section 1.2 on page 1-12**

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

Comment:

Recommendation:

15.2 Does the Facility Response Plan identify key factors that may cause revisions to the response plan and require the operator to submit revisions to the Office of Pipeline Safety within 30 days of making the revisions for factors including: (49 CFR 194.121(b)):

- New pipeline construction or purchase? : **Yes, the Facility Response Plan identifies key factors that may cause revisions to the response plan and requires the operator to submit revisions to the Office of Pipeline Safety within 30 days of making the revisions for factors including new pipeline construction or purchase in Section 1.2 on page 1-12.**

- Different worst-case discharge volume? : **Yes, the Facility Response Plan identifies key factors that may cause revisions to the response plan and requires the operator to submit revisions to the Office of Pipeline Safety within 30 days of making the revisions for factors including different worst-case discharge volume in Section 1.2 on page 1-12.**

- Change in commodities transported? : **Yes, the Facility Response Plan identifies key factors that may cause revisions to the response plan and requires the operator to submit revisions to the Office of Pipeline Safety within 30 days of making the revisions for factors including change in commodities transported in Section 1.2 on page 1-12.**

- Change in Oil Spill Removal Organization(s)? : **Yes, the Facility Response Plan identifies key factors that may cause revisions to the response plan and requires the operator to submit revisions to the Office of Pipeline Safety within 30 days of making the revisions for factors including change in Oil Spill Removal Organization(s) in Section 1.2 on page 1-12.**

- Change in Qualified Individual(s)? : **Yes, the Facility Response Plan identifies key factors that may cause revisions to the response plan and requires the operator to submit revisions to the Office of Pipeline Safety within 30 days of making the revisions for factors including change in Qualified Individual(s) in Section 1.2 on page 1-12.**

- Change in a National Contingency Plan or Area Contingency Plan that has a significant impact on the appropriateness of response equipment or response strategies? : **Yes, the Facility Response Plan identifies key factors that may cause revisions to the response plan and requires the operator to submit revisions to the Office of Pipeline Safety within 30 days of making the revisions for factors including change in a National Contingency Plan or Area Contingency Plan that has a significant impact on the appropriateness of response equipment or response strategies in Section 1.2 on page 1-12.**

- Change in response procedures? : **Yes, the Facility Response Plan identifies key factors that may cause revisions to the response plan and requires the operator to submit revisions to the Office of Pipeline Safety within 30 days of making the revisions for factors including change in response procedures in Section 1.2 on page 1-12.**

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

Comment:

Recommendation:

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

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

- Post-incident evaluation results? : **Yes, the Facility Response Plan describes procedures for incorporating improvements in post-incident evaluation results in Section 8.3 on pages 8-4 through 8-7.**

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

Comment:

Recommendation:

National Contingency Plan and Area Contingency Plan Consistency and Concept of Operations For Sequence Number: 1713

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

Page Reference: **Entire Plan**

Comment:

Recommendation:

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

Page Reference: **Entire Plan**

Comment:

Recommendation:

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

Page Reference: **Entire Plan**

Comment:

Recommendation:

TECHNICAL RESPONSE PLANNING CORPORATION

QUALITY SERVICES SINCE 1995

May 30, 2012

Jack Cowart
Terminal Manager
BP Carteret Terminal
760 Roosevelt Avenue
Carteret, NJ 07008

RE: Facility Response Plan for the BP Products North America, Inc., U.S. Logistics Carteret Terminal (EPA FRP # NY-036)

Dear Mr. Cowart:

Enclosed is a copy of the BP Carteret Terminal Facility Response Plan and Emergency Response Action Plan for your use. If you have any questions please contact me at (281) 955-9600 ext. 115 or e-mail gdesmond@trpcorp.com.

Sincerely,
TECHNICAL RESPONSE PLANNING CORPORATION

Greg Desmond
Senior Project Manager

Federal Express

1610 Woodstead Court, Ste. 355 | The Woodlands, Texas 77380 | Office: (281) 955-9600 | Fax: (281) 955-0369 | E-mail: info@trpcorp.com | Internet: www emergency-response-planning.com

TECHNICAL RESPONSE PLANNING CORPORATION

QUALITY SERVICES SINCE 1995

October 19, 2012

Jack Cowart
BP Carteret Terminal
760 Roosevelt Avenue
Carteret, NJ 07008

RE: Facility Response Plan for the BP Products North America, Inc., U.S. Logistics Carteret Terminal (EPA FRP # NY-036)

Dear Mr. Cowart:

Enclosed are three paper copies and one CD of the BP Carteret Terminal Facility Response Plan and Emergency Response Action Plan for your use. If you have any questions please contact me at (281) 955-9600 ext. 115 or e-mail gdesmond@trpcorp.com.

Sincerely,
TECHNICAL RESPONSE PLANNING CORPORATION

Greg Desmond
Senior Project Manager

Federal Express

1610 Woodstead Court, Ste. 355 | The Woodlands, Texas 77380 | Office: (281) 955-9600 | Fax: (281) 955-0369 | E-mail: info@trpcorp.com | Internet: www emergency-response-planning com

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Office of Response and Restoration

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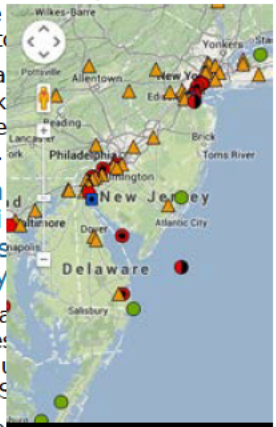

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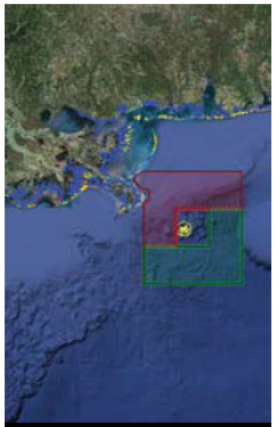

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MAP: 7
UPPER NEW YORK BAY

STRATEGY MATRIX
26 Oct 95

Sensitive Area Code	Name	Boom Method	Minimum Boom Length in Feet	Potential Staging Site Name Code, if on map Phone (N)ight if available	Impact	Access
A72	Liberty State Park	P D	3500	Liberty State Park 718 243 0199	E $	V B
B8	Liberty Island	P D	4500	Liberty Harbor Marina [M45] 201 451 1000 / (N)908 221 1938	E $	B
B9	MOTBY	P D R	5000	MOTBY 201 823 7207 / (N)201 823 7677	E $	V B
B67	Ellis Island	P D R	6000	Liberty Harbor Marina [M45] 201 451 1000 / (N)908 221 1938	E $	V B
W4	Consolidated Edison East River Generator	P D	1300	Bklyn Navy YD Dev Corp. 718 852 1441 Skyport Marina [M37] 212 686 4548	$	B
W5	Consolidated Edison Hudson Ave (20')	P D	1300	Bklyn Navy YD Dev Corp. 718 852 1441 N.Y.C. Marine Fire Dept. 718 494 4269	E $	
W10	World Trade Center (10')	P D	1300	Liberty Harbor Marina [M45] 201 451 1000 / (N)908 221 1938	$	B
W15	One New York Plaza (9')	P D	1300	Liberty Harbor Marina [M45] 201 451 1000 / (N)908 221 1938	$	V B
W16	OLYMPIA & YORK Battery Park (20')	P D	1300	USCG Marine Inspection Office 212 668 7494	$	B
R2	Amerada Hess	R	900	Marine Power & Light [M57] 718 442 8018		V B
R3	St George Fuel Pier	R	1000			B
R6	Wallabout Bay (Brooklyn Navy Yard)	R	1500	Bklyn Navy Yard Dev Corp. 718 852 1441		V B
R7	Atlantic Basin	R	1500			B

Booming Method: D - Deflect, P - Protect, R - Recover
Impact: E - Environmental, $ - Economic
Access: V - Vehicle, B - Boat

MAP: 7 (Cont.)
UPPER NEW YORK BAY

STRATEGY MATRIX
9 Feb 94

Sensitive Area Code	Name	Boom Method	Minimum Boom Length in Feet	Potential Staging Site Name / Code, if on map / Phone (N)ight if available	Impact	Access
R8	Erie Basin	R	300	Red Hook Marine Terminal 718 875 0777		B
R9	Con Ed Narrows	R				
R90	Gowanus Canal	P R	1800	Red Hook Marine Terminal 718 875 0777		V B
R92	Owls Head Park (Concert Blocks)	P R	1000	PIER 69 Brooklyn		V B
M4	North Cove Yacht Club	P	500	North Cove Yacht Club [M4] 212 938 9000	$	V B
M7	Liberty Harbor Marina	P D	300	Liberty Harbor Marina [M7] 201 451 1000 / (N)908 221 1938	$	V B
M8	Newport Yacht Club	P D	300	Newport Yacht Club [M8] 201 626 5550 / (N)718 885 0617	$	V B
M16	USCG Station New York	P R	700	Governors Isl Indus Yard [M16] 212 668 7936	$	V B
M36	South Street Seaport	P D	3000	Bklyn Navy YD Development Corp. 718 852 1441	$	V B

Booming Method: D - Deflect; P - Protect; R - Recover

Impact: E - Environmental; $ - Economic

Access: V - Vehicle; B - Boat

MAP: 8
NEWARK BAY
PASSAIC & HACKENSACK RIVERS

STRATEGY MATRIX
26 Oct 95

Sensitive Area Code	Name	Boom Method	Minimum Boom Length in Feet	Potential Staging Site Name Code, if on map Phone (N)ight if available	Impact	Access
A12	Hackensack River	P D R	5000	Roanoke Yacht Club [M48] 201 344 9379	E $	V
A13	Passaic River	P D R	3500	Roanoke Yacht Club [M48] 201 344 9379	E $	V
A14	Shooters Island	P	8000	Port Authority Beach, Staten Isl	E	
A16	Old Place Creek	P	1500	Elizabeth Marina [M1] 201 820 4269	E	V
A57	Singer Flat	P D	3500	Elizabeth Marina [M1] 201 820 4269	E $	V
A58	Port Newark Channel	P D	800	Port Newark Face Pier 201 963 7111	E $	V
A59	Port Elizabeth Channel	P D	1000	Port Newark Face Pier 201 963 7111	E $	V
A72	Liberty State Park	P D	3500	Liberty State Park 718 243 0199	E $	V
A74	Mariners Marsh	P D	650		E	
A75	Slater Park	P D	300		E	V
A93	Bridge Creek	P		Elizabeth Marina [M1] 201 820 4269	E	
B8	Liberty Island	P D	4500	Liberty Harbor Marina [M45] 201 451 1000 / (N)908 221 1938	E $	
B9	MOTBY	P D R	5000	MOTBY 201 823 5111	E $	V
B15	Elizabeth River	P D	1500	Elizabeth Marina [M1] 201 820 4296	E $	V
B46	Bodine Creek	P		Marine Power & Light [M57] 718 442 0018	E	V

Booming Method: D - Deflect; P - Protect; R - Recover

Impact: E - Environmental; $ - Economic

Access: V - Vehicle; B - Boat

, : 8 (Cont.)
NEWARK BAY
PASSAIC & HACKENSACK RIVERS

STRATEGY MATRIX
26 Oct 95

Sensitive Area Code	Name	Boom Method	Minimum Boom Length in Feet	Potential Staging Site Name Code, if on map Phone (N)ight if available	Impact	Access
R1	KVK Swimming Pool	R	500	Marine Power & Light [M57] 718 442 8018		B
R2	Amerada Hess	R	900	Marine Power & Light [M57] 718 442 8018		V B
R3	ST George Fuel Pier	R	1000			B
R12	Caddells Drydock	P R	5000			V B
R13	Texaco Dock	R	1000			V B
R14	Salt Dock	R	1000	Marine Power and Light [M57] 718 442 8018		V B
R15	Wall Street Paper	R	1000			V B
M1	Elizabeth Marina	P D	500	Elizabeth Marina [M1] 201 820 4296	$	V B
M39	Atlas Yacht Club	P	300	Atlas Yacht Club [M39] 201 858 9605	$	B
M43	Staten Island Marina	P		Staten Island Marina 718 442 8018	$	V B
M47	Roosevelt Marina			Roosevelt Marina [M47] 201 435 3864	$	V B
M48	Roanoke Yacht Club	P	500	Roanoke Yacht Club [M48] 201 344 9379	$	V B
M49	Elco Marina	P	1000	Elco Marina [M49] 201 437 2355 / (N)201 238 6965	$	V B
M50	Robbins Reef Marina	P		Robbins Reef Marina [M50] 201 858 6172	$	V B
M57	Marine Power & Light Marina			Marine Power & Light Marina [M57] 718 442 8018	$	V B

Booming Method: D - Deflect, P - Protect, R - Recover
Impact: E - Environmental, $ - Economic
Access: V - Vehicle, B - Boat

MAP: 9
STATEN ISLAND/THE KILLS

STRATEGY MATRIX
26 Oct 95

Sensitive Area Code	Name	Boom Method	Minimum Boom Length in Feet	Potential Staging Site Name Code, if on map Phone (N)ight if available	Impact	Access
A14	Shooters Island	P	8000	Port Authority Beach, Staten Isl	E	B
A16	Old Place Creek	P	1500	Elizabeth Marina [M1] 201 820 4269	E	V B
A19	Pralls Creek	P	1200	Linden Northville Terminal 908 862 5740	E	B
A20	Sawmill Creek	P	300	Linden Northville Terminal 908 862 5740	E	V B
A21	Pralls Island	P D	7500	Linden Northville Terminal 908 862 5740	E	B
A22	Neck Creek	P	300	Linden Northville Terminal 908 862 5740	E	B
				Amoco Oil Marine Terminal 908 541 5131		
A24	Fresh Kill	P D	1600	Amoco Oil Marine Terminal 908 541 5131	E	B
A25	Smith Creek	P D	300	Municipal Boat Ramp	E $	V B
A26	Woodbridge Creek	P	600	Municipal Boat Ramp	E	V B
A27	Raritan River	P D	5000	Sandy Point Beach	E $	V B
A57	Singer Flat	P D	3500	Elizabeth Marina [M1] 201 820 4269	E $	V B
A61	Lemon Creek	P D	300	Princess Bay/Saguine Pt	E	V B
A63	Mill Creek	P D	900	Tottenville Marina [M41] 718 948 7520	E	B
A66	Island of Meadows	D		AMOCO Marine Oil Terminal 908 541 5131	E	B

Booming Method: D - Deflect, P - Protect, R - Recover
Impact: E - Environmental, $ - Economic
Access: V - Vehicle, B - Boat

MAP: 9 (Cont.)
STATEN ISLAND/THE KILLS

STRATEGY MATRIX
26 Oct 95

Sensitive Area Code	Name	Boom Method	Minimum Boom Length in Feet	Potential Staging Site Name Code, if on map Phone (N)ight if available	Impact	Access
A70	Mt. Loretto	D R	300	Princess Bay/Saguine Pt	E	B
A71	Gateway National Park	D	9500	Princess Bay/Saguine Pt	E $	V B
A74	Mariners Marsh	P D	650		E	B
A75	Slater Park	P D	300		E	V B
A94	Oakwood Beach	P		Princess Bay/Saguine Pt	E $	V B
A95	Wolfe's Pond Park	P		Princess Bay/Saguine Pt	E	
B9	MOTBY	P D R	5000	MOTBY 201 823 5111	E $	V B
B15	Elizabeth River	P D	1500	Elizabeth Marina [M1] 201 820 4296	E $	V B
B17	Morses Creek	P D	1500	Phelps Dodge 908 351 3200	E $	B
B18	Piles Creek	P D	300	Linden Northville Terminal 908 862 5740	E	B
B23	Rahway River	P D	1500	AMOCO Oil Marine Terminal 908 541 5131	E	V B
B30	Great Kills Harbor	P D	1600	Richmond County Y.C. [M5] 718 948 9615 / (N)718 377 5140	E $	V B
B46	Bodine Creek	P D		Marine Power & Light [M57] 718 442 8018	E	V B
B81	Conference House Park			Princess Bay/Saguine Pt	E	
R1	KVK Swimming Pool	R	500	Marine Power & Light [M57] 718 442 8018		B

Booming Method: D - Deflect, P - Protect, R - Recover

Impact: E - Environmental, $ - Economic

Access: V - Vehicle, B - Boat

: 9 (Cont.)
STATEN ISLAND/THE KILLS

STRATEGY MATRIX
9 Feb 94

Sensitive Area Code	Name	Boom Method	Minimum Boom Length in Feet	Potential Staging Site Name Code, if on map Phone (N)ight if available	Impact	Acces
R2	Amerada Hess	R	900	Marine Power & Light [M57] 718 442 8018		V
R3	ST George Fuel Pier	R	1000			
R12	Caddells Drydock	P R	5000			V
R13	Texaco Dock	R	1000			V
R14	Salt Dock	R	1000	Marine Power and Light [M57] 718 442 8018		V
R15	Wall Street Paper	R	1000			V
W3	Con Edison Arthur Kill Gen Sta (20')	P D	2000		E $	
M1	Elizabeth Marina	P D	500	Elizabeth Marina [M1] 201 820 4296	$	V
M5	Great Kills Harbor	P D	1500	Richmond County Yacht Club [M5] 718 948 9615 / (N)718 377 5140	$	V
M39	Atlas Yacht Club	P	300	Atlas Yacht Club [M39] 201 858 9605	$	
M40	Perth Amboy Marina	P	500	Perth Amboy Marina [M40]	$	
M41	Tottenville Marina	P	2000	Tottenville Marina [M41] 718 948 7520	$	V
M42	Smith Creek Marina				$	
M43	Staten Island Marina	P		Staten Island Marina 718 442 8018	$	V
M50	Robbins Reef Marina	P		Robbins Reef Marina [M50] 201 858 6172	$	V
M57	Marine Power & Light Marina			Marine Power & Light Marina [M57] 718 442 8018	$	V

Booming Method: D - Deflect, P - Protect, R - Recover

Impact: E - Environmental, $ - Economic

Access: V - Vehicle, B - Boat

AP: 9a
UPPER ARTHUR KILL
KILL VAN KULL

STRATEGY MATRIX
26 Oct 95

Sensitive Area Code	Name	Boom Method	Minimum Boom Length in Feet	Potential Staging Site Name Code, if on map Phone (N)ight if available	Impact	Access
A14	Shooters Island	P	8000	Port Authority Beach	E	B
A16	Old Place Creek	P	1500	Elizabeth Marina [M1] 201 820 4269	E	V B
A19	Pralls Creek	P	1200	Linden Northville Terminal 908 862 5740	E	B
A20	Sawmill Creek	P	300	Linden Northville Terminal 908 862 5740	E	V B
A21	Pralls Island	P D	7500	Linden Northville Terminal 908 862 5740	E	B
A22	Neck Creek	P	300	Linden Northville Terminal 908 862 5740	E	B
				Amoco Oil Marine Terminal 908 541 5131		
A57	Singer Flat	P D	3500	Elizabeth Marina [M1] 201 820 4269	E $	V B
A75	Slater Park	P D	300		E	V B
A93	Bridge Creek	P		Elizabeth Marina [M1] 201 820 4269	E	
B9	MOTBY	P D R	5000	MOTBY 201 823 5111	E $	V B
B15	Elizabeth River	P D	1500	Elizabeth Marina [M1] 201 820 4296	E $	V B
B17	Morses Creek	P D	1500	Phelps Dodge 908 351 3200	E $	B

Booming Method: D - Deflect; P - Protect; R - Recover

Impact: E - Environmental; $ - Economic

Access: V - Vehicle; B - Boat

MAP: 9a (Cont.)
UPPER ARTHUR KILL
KILL VAN KULL

STRATEGY MATRIX
26 Oct 95

Sensitive Area Code	Name	Boom Method	Minimum Boom Length in Feet	Potential Staging Site Name Code, if on map Phone (N)ight if available	Impact	Acces
B18	Piles Creek	P D	300	Linden Northville Terminal 908 862 5740	E	
B23	Rahway River	P D	1500	AMOCO Oil Marine Terminal 908 541 5131	E	V
B46	Bodine Creek	P		Marine Power & Light [M57] 718 442 8018	E	V
R1	KVK Swimming Pool	R	500	Marine Power & Light [M57] 718 442 8018		
R2	Amerada Hess	R	900	Marine Power & Light [M57] 718 442 8018		V
R3	ST George Fuel Pier	R	1000			
R12	Caddells Drydock	P R	5000			V
R13	Texaco Dock	R	1000			V
R14	Salt Dock	R	1000	Marine Power and Light [M57] 718 442 8018		V
M1	Elizabeth Marina	P D	500	Elizabeth Marina [M1] 201 820 4296	$	V
M39	Atlas Yacht Club	P	300	Atlas Yacht Club [M39] 201 858 9605	$	
M42	Smith Creek Marina				$	
M50	Robbins Reef Marina	P		Robbins Reef Marina [M50] 201 858 6172	$	V
M57	Marine Power & Light Marina			Marine Power & Light Marina [M57] 718 442 0018	$	V

Booming Method: D - Deflect, P - Protect, R - Recover
Impact: E - Environmental, $ - Economic
Access: V - Vehicle, B - Boat

MAP: 9b
LOWER ARTHUR KILL

STRATEGY MATRIX
26 Oct 95

Sensitive Area Code	Name	Boom Method	Minimum Boom Length in Feet	Potential Staging Site Name Code, if on map Phone (N)ight if available	Impact	Access
A20	Sawmill Creek	P	300	Linden Northville Terminal 908 862 5740	E	V B
A21	Pralls Island	P D	7500	Linden Northville Terminal 908 862 5740	E	B
A22	Neck Creek	P	300	Linden Northville Terminal 908 862 5740	E	B
				Amoco Oil Marine Terminal 908 541 5131		
A24	Fresh Kill	P D	1600	Amoco Oil Marine Terminal 908 541 5131	E	B
A25	Smith Creek	P D	300	Municipal Boat Ramp	E $	V B
A26	Woodbridge Creek	P	600	Municipal Boat Ramp	E	V B
A27	Raritan River	P D	5000	Sandy Point Beach	E $	V B
A61	Lemon Creek	P D	300	Princess Bay/Saguine Pt	E	V B
A63	Mill Creek	P D	900	Tottenville Marina [M41] 718 948 7520	E	B
A66	Island of Meadows	D		AMOCO Marine Oil Terminal 908 541 5131	E	B
A70	Mt. Loretto	D R	300	Princess Bay/Saguine Pt	E	B
A95	Wolfe's Pond Park	P		Princess Bay/Saguine Pt	E	
B23	Rahway River	P D	1500	AMOCO Oil Marine Terminal 908 541 5131	E	V B
B81	Conference House Park			Princess Bay/Saguine Pt	E	
W3	Con Edison Arthur Kill Gen Sta (20')	P D	2000		E $	B

Booming Method: D - Deflect, P - Protect, R - Recover
Impact: E - Environmental, $ - Economic
Access: V - Vehicle, B - Boat

MAP: 9b (Cont.)
LOWER ARTHUR KILL

STRATEGY MATRIX
26 Oct 95

Sensitive Area Code	Name	Boom Method	Minimum Boom Length in Feet	Potential Staging Site Name Code, if on map Phone (N)ight if available	Impact	Access
M40	Perth Amboy Marina	P	500	Perth Amboy Marina [M40]	$	B
M41	Tottenville Marina	P	2000	Tottenville Marina [M41] 718 948 7520	$	V B

Booming Method: D - Deflect, P - Protect, R - Recover
Impact: E - Environmental, $ - Economic
Access: V - Vehicle, B - Boat

MAP: 11
RARITAN RIVER

STRATEGY MATRIX
9 Feb 94

Sensitive Area Code	Name	Boom Method	Minimum Boom Length in Feet	Potential Staging Site Name Code, if on map Phone (N)ight if available	Impact	Access
W29	City of Perth Amboy Old Bridge (10')	P D	1300	SR Ramp	$	V B
W30	New Brunswick Water Dept. Burnet St. (10')	P D	1500	Rocky Ranch Ramp	$	V B
W31	New Brunswick Water Dept. George St. (10')	P D	1200	Rocky Ranch Ramp	$	V B
W32	Sayreville Water Dept. Old Bridge (10')	P D	1300	SR Ramp or Truck In	$	B

Booming Method: D - Deflect, P - Protect, R - Recover

Impact: E - Environmental, $ - Economic

Access: V - Vehicle, B - Boat

MAP: 12
RARITAN BAY
LOWER NEW YORK BAY

STRATEGY MATRIX
9 Feb 94

Sensitive Area Code	Name	Boom Method	Minimum Boom Length in Feet	Potential Staging Site Name Code, if on map Phone (N)ight if available	Impact	Access
A29	Matawan Creek	P	1500	Wagner's Marina [M13] 908 583 6930 / (N)908 566 5821	E $	V B
A31	Compton Creek	P	1000	Monmouth Cove Marina 908 945 9400	E	V B
A32	Ware Creek	P	900	Monmouth Cove Marina 908 945 9400	E	B
A33	Shrewsberry River (North) XXX Deflect or recover oil before impact	D	1200	AH Municipal Marina [M15] 908 291 1670 / (N)908 681 1425	E	V B
A56	Spermaceti Cove	P	2000	Harborside Marine 908 291 4440	E	V B
A61	Lemon Creek	P D	300	Princess Bay/Saquine Pt	E	V B
A70	Mt. Loretto	D R	300	Princess Bay/Saquine Pt	E	B
A71	Gateway National Park	D	9500	Princess Bay/Saquine Pt	E $	V B
A87	Sandy Hook Beach			USCG Station Sandy Hook [M55] 908 872 3428	E	V
B28	Cheesquake Creek	P	300	Zubak's Marina	E $	V B
B30	Great Kills Harbor	P D	1600	Richmond County Y.C. [M5] 718 948 9615 / (N)718 377 5140	E $	V B
B66	Flat Creek	P D	400	Wagner Twin Towers Marina [M13] 908 583 6930 / (N)908 566 5821	E $	V B
M5	Great Kills Harbor	P D	1500	Richmond County Yacht Club [M5] 718 948 9615 / (N)718 377 5140	$	V B
M13	Wagners Marina	P D	1000	Wagner's Twin Towers Marina [M13] 908 583 6930 / (N)908 566 5821	$	V B
M15	Atlantic Highlands Marina	P	2100	AH Municipal Marina [M15] 908 291 1670 / (N)908 681 1425	$	V B
M54	Lemon Creek Marina	P	300	Lemon Creek Marina [M54]	$	V B
M55	USCG STA Sandy Hook	P D	900	USCG STA Sandy Hook [M55] 908 872 3428	$	V B

Booming Method: D - Deflect; P - Protect; R - Recover

Impact: E - Environmental; $ - Economic

Access: V - Vehicle; B - Boat

MAP 12 (Cont.)
RARITAN BAY
LOWER NEW YORK BAY

STRATEGY MATRIX
15 Nov 96

Sensitive Area Code Name	Boom Method	Minimum Boom Length in Feet	Potential Staging Site Name Code, if on map Phone (N)ight if available	Impact	Access
W33 James J. Howard Marine Safety Laboratoyr			(908) 880-8534 Pager (908) 872-1558 Office Operates @ 350-400 gpm 24 hours per day; Intake located 3-4 ft below sandy bottom; Required 2-3 hours to notice to shut down; Shut down duration 24 hours max	E $	V B

Booming Method
D - Deflect
P - Protect
R - Recover

Impact
E - Environmental
$ - Economic

Access
V - Vehicle
B - Boat

Atlantic Response Inc.

January 21, 2010

BP Products North America
125 Apollo Street
Brooklyn, NY 11222
Attn: Mr. Eric Sauerman

Dear Mr. Sauerman:

Atlantic Response, Inc. is willing to be on-call as an Emergency Response Contractor in the event of a petroleum or hazardous material spill. We will respond and supply the necessary supervision, manpower and equipment, as required, to contain and clean-up the spill. These services will be provided and charged for in accordance with the rates, terms and conditions indicated on our spill rate sheet.

We have also enclosed our standard work authorization agreement that we request to be signed prior to the start of any work. By signing and returning this agreement now, along with a signed copy of this letter, our response time to your incident will be minimized.

By signing this agreement and accompanying work authorization, you do not obligate your company to call or utilize Atlantic Response, Inc. for any services.
This offer of services is good for a period of one year. Services will be charged at the rate sheet in effect when services are provided. Enclosed is our current rate sheet dated January 1, 2010.

Thank you for considering Atlantic Response, Inc. as an Emergency Response Contractor. Please call us if you have any questions or need additional information.

Sincerely,

Robert A. Wilds Jr.
Project Manager

BP Products North America, hereby designates Atlantic Response, Inc. as an Emergency Response Contractor to be called upon, as needed.

SIGNED: Richard Bugerman DATE: 1/21/2010

TITLE: Terminal Manager

Email: info@atlanticresponse.com www.atlanticresponse.com
Tel: 732-969-8555 • Fax: 732-969-8544 • 12D Connerty Court • East Brunswick NJ 08816

CONTRACTOR agrees to perform the Work described above under the terms and conditions set forth in this agreement. **CONTRACTOR** shall sign the original Contract in the space provided in the left hand corner below and return original to the **COMPANY**. .

Please return Contract and signed original of the CONTRACTOR'S Acknowledgment of Receipt of Safety Notification materials to:

Attn: General Counsel, Urgent Contract Matter

Mail all invoices to:

VARIOUS, TO BE DETEREMED BY THE FACILITY OR LOCATION REQUIRING SERVICES

In Witness Whereof, the parties hereto have caused this Contract to be duly executed as of the day and year first above written.

CLEAN HARBORS ENVIRONMENTAL SERVICES, INC.

By: Will F Connors

Print name: William F. Connors

Title: Vice President

Date: 11/17/03

ATLANTIC RICHFIELD COMPANY

By: Anne Eames

Print Name: PROCUREMENT MGR PIPELINES & US LOGISTIC

Title: ANNE EAMES.

Date: 11/12/03.

42 Longwater Drive
Norwell, MA 02061-9149
781-792-5000

March 23, 2009

David. E. Fritz
BP America, Inc.
150 W. Warrenville Road
Naperville, IL 60563

Dear Mr. Fritz:

This letter is being sent to you in connection with the Preparedness for Response Exercise Program (PREP) requirements of Response Plan Holders under OPA-90 for the OPA-90 period of January 1, 2009 to December 31, 2009. Clean Harbors Environmental Services, Inc. is an active oil spill response company that exercises its spill response equipment on a daily basis, during its normal business activities (see enclosed Equipment Deployment examples).

In addition to this exercising of equipment, Clean Harbors has a program of regular Preventative Maintenance. Furthermore, Clean Harbors has regular on-going training programs for its spill personnel. This training includes, but is not limited to, OSHA 40 hour Hazwoper, 8-Hour OSHA Refresher, Confined Space Entry, Competent Person, PR/First Aid and Marine Operations. Should you desire more detail or wish to review our Preventative Maintenance and Training records, please call us at 781-792-5000.

Finally, we are available, at quoted rates, to participate in drills using our equipment, at your facility. Thank you for listing us on your OPA-90 Response Plan and we look forward to continuing to serve you in this capacity.

Sincerely,

Bryan G. Sears

OPA-90 ER Preparedness Coordinator

Clean Harbors
ENVIRONMENTAL SERVICES

Emergency Response Services
1.800.OIL.TANK
42 Longwater Drive
Norwell MA 02061-9149
(781) 792-5000

March 23, 2009

David. E. Fritz
BP America, Inc.
150 W. Warrenville Road
Naperville, IL 60563

Dear Mr. Fritz:

Please let this letter serve as evidence that the STANDBY EMERGENCY RESPONSE AGREEMENT (SERA), executed in 2003 by Clean Harbors Environmental Services (CHES), with corporate offices in Norwell, Massachusetts and BP America Inc is an "evergreen" agreement and, as such, remains in force on this date, and will remain in force for all of 2009.

The purpose and intent of the SERA was, and continues to be, to provide BP America Inc with emergency oil spill response resources and response capabilities, as required under the Oil Pollution Act of 1990, according to the terms and conditions of the 2003 agreement and in accordance with the USCG OSRO Ratings on file with the USCG for Clean Harbors.

CHESI holds all necessary permits to perform this type of emergency response, and has regular training programs in place for all of its responders, including, but not limited to, 40 hour OSHA "Hazwoper" training and annual 8 hour refresher.

NOTE: All coverage stated in the SERA, is included on the attached list of sites.

Any questions on this matter should be directed to this writer at (339) 832-7104.

Sincerely,
Bryan G Sears

BP America Inc. Site List for CHES Response Plan Listing 7-17-08

Air BP Bayway Turbo Oil Plant
Air BP Dulles Washington DC
Air BP Cleveland Hopkins
Castrol Baltimore Lube Plant
Canton Ohio Logistics Terminal
Cincinnati Ohio Logistics Terminal
Cleveland Ohio Logistics Terminal
Curtis Bay Maryland Logistics Terminal
Dayton Ohio Logistics Terminal
Fairfax Virginia Logistics Terminal
Lorain Ohio Logistics Terminal
Niles Ohio Logistics Terminal
Whiting Refinery

INVOICE

REMIT TO:
Clean Harbors Env. Services
PO Box 3442
Boston, MA 02241-3442

OFFICE:
Clean Harbors Env Services Inc
2930 Independence Road
Cleveland, OH 44115
(216) 429-2401

If you have any questions regarding this invoice, please contact your customer service representative at the telephone number listed above

SOLD TO:
Glenn Luckinbill
BP America Inc
Mail Code CHC 150 W. Warrenville Rd.
Naperville, IL 60563

JOB SITE/GENERATOR:
BP America Inc
150 West Warrenville Road
Naperville, IL 60563

Job Description: OPA-90 Administrative Fees

**** Payable in USD funds ****

Last Service Date	Invoice No	Customer	Sales Order	Purchase Order	Terms
16 Jan 2009	OH0992089	BP0014	OH2198186	DAVID FRITZ	NET 30 DAYS

Last Service Date	Task	Task Type	Description	Total
16 Jan 2009	OH2198186-001	GENERAL	OPA-90 Administrative Fees	$1,200.00

SUBTOTAL	**$1,200.00**
TAX	**$0.00**
INVOICE TOTAL	**$1,200.00**

Interest will be charged at a rate of 1.5% per month for all past due amounts.

PLEASE RETURN A COPY OF INVOICE WITH PAYMENT - THANK YOU

INVOICE

TASK OH2198186-001 - OPA-90 Administrative Fees

Manifest Info	Item ID	Description	Manifest Qty	Manifest UOM	Billing Qty	Billing UOM	Unit Price	Amount
		16 Jan 2009						
	EXPENSES	Misc. Job expenses			1.000	EA	1,200.0000	$1,200.00
							SUBTOTAL	**$1,200.00**
							TAX	**$0.00**
							TASK TOTAL	**$1,200.00**

Internal Exercise documentation Form
Equipment Deployment Exercise

11800 South Stony Island Ave
Chicago IL 60617
(800) 678-4244 ext. 602
(773) 646-6381 (facsimile)

1. Date performed **2-22-08**
2. Exercise or actual response: **Actual Response**

   If an exercise , announced or unannounced: **Unannounced**

3. Deployment Locations**: Galena Road Gravel- Illinois River**

4. Time Started: **11:30**
   Time Completed: **hard boom was pulled when the tugboat was lifted 4-1-08**
5. Equipment Deployed was:
   Facility Owned
   Oil Spill removal organization owned if so which OSRO (Clean Harbors)
   OSRO

6. List types and amount of all equipment (e.g. boom & skimmers) deployed and number of support personnel employed:

Foreman, -5 Field Techs & E/O for 4 days straight
1000’ 18” Harbor Boom, 14’ Jon Boat
1-1000 gallon Skid Vac, 5- Mustang suits, Cusco, 4-chainsaws to cut ice
500’ of absorbent boom, absorbent pads

7. Describe goals of the equipment deployment and list any area contingency plan strategies tested . Attach a sketch of equipment deployment & booming stragagies)

Securing boom around a sunken tugboat and barge areas. Ice booming technique by cutting into the ice to make a path for the boom.

8. 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?

NO

9. For deployment of OSRO-owned equipment was a representative sample (at least 1000' of each boom type and at least one of each skimmer type) deployed

Yes for the exception of the skimmers which were not useable due to ice

Was the equipment deployed in its intended operating environment?

Yes

10. Are all facility personel that are responsible for response operations involved in a comprehensive training program, and all pollution response equipment involved in a comprehensive maintenance program? **Yes**
    If so describe the program: **40-hour OSHA, 8-hour refresher, CPR, First-aid, boating safety and monthly P/M**

Date of last equipment inspection: **07/12/07**

11. Was the equipment deployed by personnel responsible for its deployemnt in the event of an actual spill? **Yes**

12. Was all deployed equipment operational. If not, why not? **Yes**

13. Identify which of the 15 core components of our response plan were exercised during this particular exercise? 1, 2, 3, 4, 5, 6, 7, 8, 10, 11, 12, 13, 14,15

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

Steven Osuch

Certifying Signature

Retain this form and other documentation related to this exercise on file for a minimum of 3 years (USCG/RSPA/MMS) or for a minimum of 5 years (for EPA)

11800 S. Stony Island
Chicago, IL. 60617
Ph. 800.678.4244
Fax 773.646.6381

Internal Exercise documentation Form
Equipment Deployment Exercise

1. Date performed**: Oct 3, 2008**

2. Exercise or actual response: **Exercise**

If an exercise , announced or unannounced**: unannounced**

3. Deployment Locations**: Westway Terminals**

4. Time Started**: 1115**

Time Completed: **1600**

5. Equipment Deployed was: **OSRO-Chicago**
Facility Owned
Oil Spill removal organization owned if so which OSRO (Clean Harbors)
Both

6. List types and amount of all equipment (e.g. boom & skimmers)deployed and number of support personnel employed:
1 foreman, 5-techs, 1000' 18" harbor boom, 1- 27' Hanko w/150hp, 1 vacuum unit, 1 – double barrel skimmer

7. Describe goals of the equipment deployment and list any area contingency plan strategies tested . Attach a sketch of equipment deployment & booming stragagies)
Dock area containment achieved.

8. 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?

No facility equipment

9. For deployment of OSRO-owned equipment was a representative sample (at least 1000' of each boom type and at least one of each skimmer type) deployed
Yes

Was the equipment deployed in its intended operating environment?

Yes

10. Are all facility personel that are responsible for response operations involved in a comprehensive training program, and all pollution response equipment involved in a comprehensive maintenance program? **Yes**
    If so describe the program: **40-hour OSHA, 8-hour refresher, CPR, First-aid, boating safety and monthly P/M**

    Date of last equipment inspection**:04/19/08**

11. Was the equipment deployed by personnel responsible for its deployment in the event of an actual spill? **Yes**

12. Was all deployed equipment operational. If not, why not? **Yes**

13. Identify which of the 15 core components of our response plan were exercised during this particular exercise? **1,2,3,4,5,6,7,8,10,12,13,15**

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

Certifying Signature **Joe Rios**

Retain this form and other documentation related to this exercise on file for a minimum of 3 years (USCG/RSPA/MMS) or for a minimum of 5 years (for EPA)

Clean Harbors Env. Services Inc.
2930 Independence Rd.
Cleveland, OH 44115
Office: 216-429-2401
Fax: 216-429-2713

Internal Exercise documentation Form
Equipment Deployment Exercise

1. Date performed: **8 May 2008**

2. Exercise or actual response**: Exercise**

   If an exercise, announced or unannounced**: Announced**

3. Deployment Locations: **Cleveland Lakefront State Park**
Cleveland, OH

4. Time Started**: 0800hrs**

   Time Completed: **1430hrs**

5. Equipment Deployed was**: (1) 20' Workskiff Boat, 1000' Hard Boom**
   Facility Owned: **No**
   Oil Spill removal organization owned if so which OSRO (Clean Harbors)
   Both**: Clean Harbors**

6. List types and amount of all equipment (e.g. boom & skimmers) deployed and number of support personnel employed**: (1) Supervisor, (3) Foreman, (4) Field Tech, (1000 feet) Hard Boom, (1) Boat**

7. Describe goals of the equipment deployment and list any area contingency plan strategies tested. Attach a sketch of equipment deployment & booming stratagies)
   Perform boom deployment in a small harbor on Lake Erie at Cleveland Lakefront State Park. Crews deployed boom over a break wall to boat allowing the supervisor to train foreman and techs how to corral and contain spills on water for recovery purposes. At the end, trained everyone how to load boom on trailers to be ready for next spill.

8. 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

9. For deployment of OSRO-owned equipment was a representative sample (at least 1000' of each boom type and at least one of each skimmer type) deployed
No

Was the equipment deployed in its intended operating environment?
Yes

10. Are all facility personnel that are responsible for response operations involved in a comprehensive training program, and all pollution response equipment involved in a comprehensive maintenance program? **Yes**
If so describe the program: **40-hour OSHA, 8-hour refresher, CPR, First-aid, boating safety and monthly P/M**

Date of last equipment inspection: **5 May 2008 (New Boat)**

11. Was the equipment deployed by personnel responsible for its deployment in the event of an actual spill? **Yes**

12. Was all deployed equipment operational. If not, why not? **Yes**

13. Identify which of the 15 core components of our response plan were exercised during this particular exercise? **1 Through 13**

14. Attach a description of lesson(s) learned and person(s) responsible for follow up of corrective measures.
Refresher training for some personnel and first time training for the rest. Utilizing boat to deploy boom for spill containment and perform safe work practices

Certifying Signature:

Ronald M. Vaughn

Retain this form and other documentation related to this exercise on file for a minimum of 3 years (USCG/RSPA/MMS) or for a minimum of 5 years (for EPA)

Clean Harbors Env. Services Inc.
2930 Independence Rd.
Cleveland, Ohio 44115
Office: 216-429-2401
Fax: 216-429-2713

Internal Exercise documentation Form
Equipment Deployment Exercise

1. Date performed: **July 13, 2008**

2. Exercise or actual response: **Actual Response**

   If an exercise, announced or unannounced:

3. Deployment Locations: **First Energy**
   1970 Scranton Road
   Cleveland, OH

4. Time Started: **0800/hrs**

   Time Completed: **1930/hrs**

5. Equipment Deployed was: **(1) 24' Work Skiff boat, 100' hard boom**
   Facility Owned **No**
   Oil Spill removal organization owned if so which OSRO: **Clean Harbors**

6. List types and amount of all equipment (e.g. boom & skimmers) deployed and number of support personnel employed: **(1) Foreman, (3) Field Techs, (1) Equipment Operator, 100' of hard boom, (1) boat,**

7. Describe goals of the equipment deployment and list any area contingency plan strategies tested . Attach a sketch of equipment deployment & booming stragagies) **Perform boom deployment in a small area off the Cuyahoga River. Crews deployed hard boom on sight to prevent oil from moving down stream.**

8. 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? **N/A**

9. For deployment of OSRO-owned equipment was a representative sample (at least 1000' of each boom type and at least one of each skimmer type) deployed **No**

10 Was the equipment deployed in its intended operating environment? **Yes**

11. Are all facility personel that are responsible for response operations involved in a comprehensive training program, and all pollution response equipment involved? in a comprehensive maintenance program? **Yes**
If so describe the program: **40-hour OSHA, 8-hour refresher, CPR, First-aid, boating safety and monthly P/M**

Date of last equipment inspection: **November** 1**, 2008**

12. Was the equipment deployed by personnel responsible for its deployemnt in the event of an actual spill? **Yes**

13. Was all deployed equipment operational. If not, why not? **Yes**

14. Identify which of the 15 core components of our response plan were exercised during this particular exercise? **1 through 13**

15. Attach a description of lesson(s) learned and person(s) responsible for follow up of corrective measures. **New field personnel were taught how to deploy boom and perform Safe work practices.**

Certifying Signature

Retain this form and other documentation related to this exercise on file for a minimum of 3 years (USCG/RSPA/MMS) or for a minimum of 5 years (for EPA)

ENVIRONMENTAL SERVICES®

3527 Whiskey Bottom Road
Laurel, MD 20724
301.939.6000 office
301.939.6076 fax

Internal Exercise documentation Form
Equipment Deployment Exercise

1. Date performed: 8/7/08

2. Exercise or actual response: response

   If an exercise , announced or unannounced:

3. Deployment Locations: Domino Sugar Plant

4. Time Started: 0530

   Time Completed: 1730

5. Equipment Deployed was:
   Facility Owned
   Oil Spill removal organization owned if so which OSRO (Clean Harbors)
   Both X

6. List types and amount of all equipment (e.g. boom & skimmers)deployed and number of support personnel employed: Supervisor x 1, Foreman x 1, Tech III x 2, Tech I x 3, pickup x 3, jon boat x 1, containment boom x 500', er trailer x 1, sweep x 19 bales.

7. Describe goals of the equipment deployment and list any area contingency plan strategies tested . Attach a sketch of equipment deployment & booming stragagies) Contain spilled diesel fuel with containment boom and use sweep to absorb fuel on the water.

8. 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

9. For deployment of OSRO-owned equipment was a representative sample (at least 1000' of each boom type and at least one of each skimmer type) deployed
No

Was the equipment deployed in its intended operating environment?
Yes

10. Are all facility personel that are responsible for response operations involved in a comprehensive training program, and all pollution response equipment involved in a comprehensive maintenance program? **Yes**
If so describe the program: **40-hour OSHA, 8-hour refresher, CPR, First-aid, boating safety and monthly P/M**

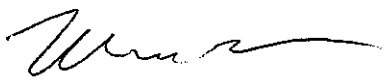
Date of last equipment inspection: 8/1/08

11. Was the equipment deployed by personnel responsible for its deployment in the event of an actual spill? yes

12. Was all deployed equipment operational. If not, why not? No, 1 outboard engine continued to stall.

13. Identify which of the 15 core components of our response plan were exercised during this particular exercise? Notifications, Staff Mobilization, Ability to respond, Discharge Control, Assesment, Containment, Recovery, Protection, Communications, Personnel Support, Equipment Maintenance & Support, Procurement, Documentation.

14. Attach a description of lesson(s) learned and person(s) responsible for follow up of corrective measures. Take 15hp outboard to get serviced, if unable to service retire and replace, to be done by coordinator.



Certifying Signature

Retain this form and other documentation related to this exercise on file for a minimum of 3 years (USCG/RSPA/MMS) or for a minimum of 5 years (for EPA)

3527 Whiskey Bottom Road
Laurel, MD 20724
301-939-6076 (fax)
301-939-6000

Internal Exercise documentation Form
Equipment Deployment Exercise

1. Date performed: **8/06/2008**

2. Exercise or actual response: **Response**

   If an exercise , announced or unannounced: **unannounced**

3. Deployment Locations: **DOMINOES SUGAR PLANT**

4. Time Started: **11:00AM**

   Time Completed: **18:00PM**

5. Equipment Deployed was:
   Facility Owned
   Oil Spill removal organization owned if so which OSRO (Clean Harbors)
   Both

6. List types and amount of all equipment (e.g. boom & skimmers)deployed and number of support personnel employed: **400 feet of containment boom, 24' hanko work boat, 10' jon boat with 25 hp engine, 2 pickup trucks, boom trailer, 1 Foreman, 1 Supervisor, 2 Field Technician II, 4 Field Tech I.**

7. Describe goals of the equipment deployment and list any area contingency plan strategies tested . Attach a sketch of equipment deployment & booming stragagies)
Crew arrived onsite assessed the situation ,placed boom minimize further spread and maximize containment of spill ,crew then proceeded to pad up oil from top of water
(via) jon boat ,and decon surrounding piers and docks…….24' alumcraft on stand by
With additional supplies and crew should the spill escape primary containment.

8. 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**

9. For deployment of OSRO-owned equipment was a representative sample (at least 1000' of each boom type and at least one of each skimmer type) deployed? **yes**

Was the equipment deployed in its intended operating environment? **yes**

10. Are all facility personel that are responsible for response operations involved in a comprehensive training program, and all pollution response equipment involved in a comprehensive maintenance program? **Yes**
If so describe the program: **40-hour OSHA, 8-hour refresher, CPR, First-aid boating safety and monthly P/M**

Date of last equipment inspection: **6/6/08**

11. Was the equipment deployed by personnel responsible for its deployemnt in the event of an actual spill? **yes**

12. Was all deployed equipment operational. If not, why not? **yes**

13. Identify which of the 15 core components of our response plan were exercised during this particular exercise?

1. **Notifications**
2. **Staff Mobilization**
3. **Ability to operate within the Response Management System described in the Response Plan**
5. **Discharge Control**
6. **Assessment**
7. **Containment**
8. **Protection**
9. **Disposal**
10. **Communication**
11. **Personnel Support**
12. **Equipment Maintenance and Support**
13. **Documentation**

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

    1. **Jon boat should have basic supplies already onboard. Coordinator will make a checklist to ensure all supplies needed are onboard.**

MARK HALE

Certifying Signature

Retain this form and other documentation related to this exercise on file for a minimum of 3 years (USCG/RSPA/MMS) or for a minimum of 5 years (for EPA)

MARINE SPILL RESPONSE CORPORATION
SERVICE AGREEMENT

EXECUTION INSTRUMENT

The MSRC SERVICE AGREEMENT attached hereto (together with this execution instrument, the "Agreement"), a standard form of agreement amended and restated as of September 27, 1996, is hereby entered into by and between

BP America, Inc.
[Name of COMPANY]

a Delaware Corporation
[Type of entity and place of organization]

with its principal offices located at 200 East RAndolph Drive, Chicago, IL 60601

(the "COMPANY"), and MARINE SPILL RESPONSE CORPORATION, a nonprofit corporation organized under the laws of Tennessee ("MSRC"), and shall be identified as

SERVICE AGREEMENT No. 6MPA130 [This is to be provided by MSRC.]

IN WITNESS WHEREOF, the parties hereto each have caused this Agreement to be duly executed and effective as of Sept. 26, 2000.

BP America, Inc. [COMPANY]

By: _____ [signature]

John Ridgway [print name]

Title: Regional Manager

Address: 28100 Torch Parkway

Warrenville, IL 60555

Telephone: 630 836-6869 Fax: 630 836-6987

MARINE SPILL RESPONSE CORPORATION:

By: Judith A. Roos

Judith A. Roos
Marketing & Customer Service Manager
455 Spring Park Place, Suite 200
Herndon, Virginia 20170

703/326-5617; Fax: 703/326-5660

MARINE SPILL RESPONSE CORPORATION
SERVICE AGREEMENT

STANDARD FORM OF SERVICE AGREEMENT

amended and restated as of September 27, 1996

between

the COMPANY

and

MARINE SPILL RESPONSE CORPORATION

a Tennessee nonprofit corporation

MARINE SPILL RESPONSE CORPORATION
SERVICE AGREEMENT

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LIST OF SCHEDULES

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Schedule 1	Defined Terms (9/27/96)
Schedule 2	Financial Responsibility (3/21/97)
Schedule 3	Resources and Rates (Parts I & II - (9/27/96). Part III - 1/1/97)
Schedule 4	Acceptable Responder Immunity States (8/15/97)
Schedule 5	Form of Contractor Indemnification Agreement (Schedule 5 - 9/27/96; Schedule 5A - 7/1/97)
Schedule 6	List of MSRC Integral Subcontractor Service Categories and Indemnified Integral Subcontractors (11/28/94)
Schedule 7	MSRC Insurance Coverage (7/29/96)
Schedule 8	List of P&I Clubs (11/28/94)
Schedule 9	Arbitration Provisions (9/27/96)

July 1, 1997

MARINE SPILL RESPONSE CORPORATION SERVICE AGREEMENT

STANDARD FORM OF AGREEMENT

Parties and Background

This is a **SERVICE AGREEMENT** with attached signature pages (the "Agreement") between the **COMPANY** and **MARINE SPILL RESPONSE CORPORATION**, a nonprofit corporation organized under the laws of Tennessee (**"MSRC"**).

For convenience and simplicity, as between the **COMPANY** and Covered Entity (if any), references to the party for performance are made to a "Covered Entity," but the **COMPANY** can exercise the rights and will guarantee the performance of a Covered Entity as set forth more fully in this Agreement.

In consideration of the promises and the mutual covenants of this Agreement, **MSRC** and the **COMPANY** agree as follows:

Articles

ARTICLE I CALLOUT

1.01. Call-Out of Resources

1.01(a). Alert. A Covered Entity may alert **MSRC** of the possibility of a call-out under this Agreement. Upon receipt of an alert **MSRC** will review its readiness to respond in the event of a call-out under Section 1.01(b). Such alert does not (i) obligate the Covered Entity to pay **MSRC**'s rates or any costs incurred by **MSRC**, (ii) obligate **MSRC** to Mobilize any Resources, or (iii) give the Covered Entity any rights to obtain any particular Resources, unless and until **MSRC** is called out in accordance with this Agreement.

1.01(b). Call Out Process. An Authorized Representative, or an individual **MSRC** reasonably believes is acting on behalf of a Covered Entity, may obtain and **MSRC** will provide any of the Resources available under this Agreement by calling an **MSRC** response manager through one of the telephone call-out numbers provided by MSRC from time to time by notice to the **COMPANY**. This Initial Callout Notice shall consist of a specific request for desired Resources to be provided from the list on Schedule 3 (or as otherwise made available by **MSRC** at the time of callout), in consultation with one of **MSRC**'s response managers. The Authorized Representative or the Incident Commander of a Covered Entity may add to or discontinue use of any Resources, in consultation with **MSRC**'s response manager, at any time. The Covered Entity and **MSRC** will document the Resources requested and provided. If MSRC Subcontractors are required to provide the requested Resources, **MSRC** will call out and supervise those MSRC Subcontractors, unless and until other arrangements are made as described in Section 3.04. Part II of Schedule 3 contains the special terms and conditions and call out procedures for MSRC support for transfer operations requiring "Average Most Probable Discharge" response capability under OPA.

1.02. Response to Non-Covered Vessels and Facilities and Other Sources. If **MSRC** is called to respond to a Vessel or Facility or other source of a Discharge for which the **COMPANY** has not demonstrated financial responsibility in accordance with Schedule 2 (including a Vessel or Facility for which **MSRC** is not cited in OPA Response Plans as a spill response contractor), the **COMPANY** must promptly furnish evidence of financial responsibility under Schedule 2 for that Vessel or Facility or source of Discharge.

1. 03. Mobilizing MSRC Response Resources. As soon as practicable under the circumstances after **MSRC** receives an Initial Call-Out Notice or subsequent change to a request, **MSRC** will Mobilize the requested Resources including MSRC Subcontractors.

ARTICLE II. CAPABILITIES

2.01. Resource Availability. Except as otherwise directed by governmental

authorities, agreed by mutual consent or as described below, Resources are provided to the **COMPANY** and others on a first-come/first-served basis. Any of the Resources can be requested for any Spill Event, subject to the following restrictions and qualifications, as applicable:

2.01(a). Oil Spill Event outside MSRC's Operational Area. For an Oil Spill Event occurring within U.S. Jurisdictional Waters but outside the Operational Area, **MSRC** will not provide any Resources whose movement is prohibited by law or order of the applicable Governmental Body, or if such movement would invalidate any Response Plan within the Operational Area. In such event, **MSRC** will coordinate with the Covered Entity to seek a waiver of any such prohibition, order or invalidation from the applicable Governmental Body in order to remove this restriction.

2.01(b). Responder Immunity. If at any time Responder Immunity is not available for a Spill Event, **MSRC** may withdraw, or decline to provide, MSRC Response Personnel or any Resources requiring such MSRC Response Personnel, unless other arrangements acceptable to **MSRC** in its sole discretion are made to offset any additional legal and financial risk that may result.

2.01(c). Discharges of substances other than Oil or Discharges outside U.S. Jurisdictional Waters. MSRC may offer from time to time to provide Resources under this Agreement to Spill Events involving substances other than Oil (including Hazardous Substances) or Spill Events outside U.S. Jurisdictional Waters as permitted and in accordance with **MSRC**'s policies and procedures adopted from time to time. Any additional or different terms and conditions applicable to the provision of Resources for such non-Oil and non-U.S. Spill Events will be set forth in an addendum to this Agreement executed by MSRC and the **COMPANY** in advance or at the time of callout for the Spill Event.

2.01(d). Conflicting Requests. If the Covered Entity and some other person with whom **MSRC** has a contract both desire the same Resources or otherwise have conflicting requests, **MSRC** will immediately notify and consult with each of the respective incident commanders regarding the conflict. **MSRC** will continue to follow a first-come/first-served approach unless and until it receives timely non-conflicting directions from the incident commanders to redirect Resources or activities. If, after such notice and consultation the conflicting parties still do not agree, **MSRC** will follow the relevant FOSC(s)' non-conflicting directions, if any.

2.02. Changes in Resources Offered. **MSRC** will periodically update Schedule 3 to reflect changes in the Resources offered under this Agreement, and will give prompt notice to the **COMPANY** in advance where practicable of any significant reduction in response capability.

ARTICLE III ROLES AND PROCEDURES FOR RESPONSE PERFORMANCE

3.01 Responsibilities of the COMPANY and Covered Entity

3.01(a) General Management and Overall Direction. Subject to the power and authority of Governmental Bodies, the Covered Entity will provide general management and overall direction and control of all Response Activities under this Agreement. The Covered Entity shall designate an Incident Commander, who shall be in frequent communication with **MSRC** while **MSRC** is providing Resources under this Agreement. The designated Incident Commander will advise **MSRC** in writing of any non-apparent limitations and restrictions on the authority of the Covered Entity's employees, contractors, and agents to authorize and direct Response Activities of **MSRC** and MSRC Subcontractors. The Incident Commander will also advise **MSRC** of any directions or pertinent concerns of Governmental Bodies or the Unified

Command that affect, or that may reasonably be expected to affect, any Resources or activities under this Agreement. All activities of **MSRC** under this Section 3.01(a) will be subject to the overall direction and control of the Covered Entity.

3.01(b) Care of Resources. The Covered Entity will use its best efforts to operate, maintain, and store any **MSRC** Response Equipment provided without associated **MSRC** Response Personnel in a careful and proper manner under the circumstances and in accordance with applicable law.

3.02 Responsibilities of MSRC

3.02(a) Operational Supervision. **MSRC** will, within the limits of its available resources, at the Covered Entity's cost and expense, and in accordance with applicable law, provide operational supervision and coordination (i) for Resources, including any MSRC Subcontractor called out by **MSRC** prior to assignment under Section 3.04, and (ii) upon request of the Covered Entity, for any subcontractors called out by or assigned to the Covered Entity. Such supervision shall be in accordance with and subject to the overall direction and control of the Covered Entity's Incident Commander, as described in Section 3.01(a).

3.02(b) Initial Coordination and Communication. **MSRC** will, upon request, provide an on-scene point of coordination and communication between the Covered Entity and the FOSC and other response officials until the first to occur of: (i) 24 hours after initial callout: or (ii) the Covered Entity's response management team (as contemplated by 33 CFR 155.1035(d)) arrives on-scene and assumes direct management and control.

3.02(c) Governmental Directions. **MSRC** will immediately notify the Covered Entity's Incident Commander of any directions **MSRC** receives from any Governmental Body which **MSRC** believes may conflict with previous guidance or direction **MSRC** may have received from the Covered Entity. If the FOSC or SOSC gives directions to **MSRC** and **MSRC** does not receive timely directions from the Incident Commander, **MSRC** will follow those FOSC or SOSC directions. In any event, **MSRC** will immediately act on directions from any Governmental Body that relate to personnel safety, alleged violations of law or regulations, immediate endangerment of public health or the environment, or directions that constitute an order or command of a Governmental Body with apparent legal authority. **MSRC** will notify the Incident Commander of those directions and immediate actions as soon as practicable under the circumstances.

3. 03. Response Methods. The Covered Entity will use its best efforts to direct Response Activities, and **MSRC** will provide Resources, in a manner that will (i) comply with all applicable law and (ii) maintain the applicable Responder Immunity of **MSRC** and MSRC Integral Subcontractors. Subject to the provisions of Section 3.02(c), **MSRC** will commit only those resources as are reasonably necessary to carry out the Response Activities or response objectives that **MSRC** has been directed or authorized by the Covered Entity, an Authorized Representative, or Incident Commander to carry out, unless a specific resource(s) is requested by any one of the above-named entity or Persons.

3.04 Covered Entity Directions. When **MSRC** follows directions pursuant to the procedures of Section 3.02, those directions will be deemed to have been provided by the Covered Entity unless and until further or alternative directions are provided in accordance with the terms of this Agreement by the Covered Entity, its Authorized Representative, or Incident Commander.

3.05 Subcontractors. **MSRC** will retain MSRC Subcontractors under terms and conditions agreeable to the MSRC Subcontractors and **MSRC**. **MSRC** will provide to a Covered Entity, on request, a

copy of **MSRC**'s contract with any MSRC Subcontractor (except for MSRC Integral Subcontractors). Upon request by a Covered Entity and consent of the MSRC Subcontractor, **MSRC** will assign the rights and obligations of **MSRC** under the subcontractor contract with respect to that Spill Event to the Covered Entity (except for MSRC Integral Subcontractors whose contracts are not assignable). Unless the Covered Entity directs otherwise, **MSRC** generally will provide, at the Covered Entity's expense in accordance with Schedule 3, support services necessary to sustain and support ongoing response operations of **MSRC** and MSRC Subcontractors, including food service, lodging, local transportation, safety and medical support, and other support for personnel, and fuel, docking, garage, hangar and similar support services for vessels, aircraft, and vehicles. However, the Covered Entity must provide such support services if the response occurs outside **MSRC**'s Operational Area and **MSRC** does not have preexisting arrangements for such support services.

3.06 Safety

3.06(a) MSRC and its Subcontractors. **MSRC** will observe and require its employees and MSRC Subcontractors to observe relevant safety laws and regulations and applicable **MSRC** safety policies and procedures. While on a Covered Entity's facilities or vessels, **MSRC** will comply and require its employees and MSRC Subcontractors to comply with the Covered Entity's specific instructions concerning safety policies and procedures provided to them by the Covered Entity. **MSRC** will report and require its employees and MSRC Subcontractors to report to the Covered Entity as promptly as practicable any accidents associated with the Resources resulting in or that reasonably could have resulted in serious personal injury, death, or material property damage or loss. At the completion of the applicable Response Activities by **MSRC** but in any event within the time required by law, **MSRC** will provide to the Covered Entity all Occupational Safety and Health Act (OSHA) injury and illness reports involving **MSRC** employees provided under this Agreement.

3.06(b) Covered Entity and its subcontractors. The Covered Entity will observe and require its employees and subcontractors to observe relevant safety laws and regulations and applicable Covered Entity safety policies and procedures. While on **MSRC**'s facilities or vessels, the Covered Entity will comply and require its employees and contractors to comply with **MSRC**'s specific instructions concerning safety policies and procedures provided to them by **MSRC**. The Covered Entity will report and require its employees and subcontractors to report to **MSRC** as promptly as practicable any accidents associated with the Resources resulting in or that reasonably could have resulted in serious personal injury, death, or material property damage or loss. At the completion of the Response Activities by **MSRC** but in any event within the time required by law, the Covered Entity will provide to **MSRC** all OSHA injury or illness reports relating to the employees of the Covered Entity suffering injury or illness while on **MSRC**'s facilities or vessels.

3.06(c) Reasonable Interpretation. The obligations of **MSRC** and Covered Entity under this Section 3.06 are not intended to hold the parties to a standard that would be unreasonable under the actual conditions of a particular Discharge or threat of Discharge and the inherent difficulties and danger of emergency response. All **MSRC** and Covered Entity actions carried out consistently with the directions of the FOSC or SOSC, or with approval of applicable safety officials, will be deemed to be in compliance with this Section 3.06.

3. 07. Recovered Product or Waste.

3.07(a) Definitions. For purposes of this section:

(i)"Management" means generation, recovery, transportation, storage, treatment,

handling, disposal, disposition, possession, control, operation, ownership, importation, or exportation.

(ii) "Recovered Product or Waste" means contained or recovered Oil, oily waste, Hazardous Substances, or mixtures thereof, including contaminated properties.

(iii) "Charges" means license fees, import or export duties, tariffs, taxes, tipping fees or other costs or charges imposed by any Governmental Body with respect to Recovered Product or Waste.

3.07(b) Allocation of Responsibility. As between MSRC and the Covered Entity, the Covered Entity bears all risk, liability, and responsibility for and will perform or otherwise satisfy all duties and obligations and pay all Charges associated with the Management of Recovered Product or Waste.

3.07(c) Covered Entity's Responsibilities. The Covered Entity will promptly provide to MSRC:

(i) the necessary documentation for MSRC to deliver Recovered Product or Waste for transportation by others to the selected facilities;

(ii) appropriate instructions (orally and promptly confirmed in writing) for the Management of Recovered Product or Waste;

(iii) access to facilities, vessels or other receptacles for receipt or disposal of Recovered Product or Waste.

3.07(d) MSRC Actions. If the Covered Entity fails to meet any of its obligations in (a) or (b) within a reasonable time after request by MSRC, MSRC can:

(i) discontinue operations that depend on the Covered Entity's actions: or

(ii) make the appropriate arrangements for Management of Recovered Product or Waste in the name, on behalf, and at the sole cost and expense of, the Covered Entity.

3. 08. Information Coordination and Control. Except as provided below or as otherwise directed or permitted by the Covered Entity, **MSRC** will maintain as confidential all information that (i) **MSRC** obtains from any Covered Entity, MSRC Subcontractor or other subcontractor participating in the Spill Event on behalf of the Covered Entity and (ii) the Covered Entity reasonably designates as confidential. **MSRC** will coordinate all media and public responses by **MSRC** with the Covered Entity, in advance of the responses if feasible. The Covered Entity may provide **MSRC** with a Public Information Plan ("PIP") that identifies the Covered Entity's specific processes, policies, and guidelines with respect to interaction with the public and the media, which the Covered Entity may amend or supplement from time to time. **MSRC** will follow those policies and guidelines and may reference that guidance in responding to any media inquiries. If the Covered Entity has not provided **MSRC** with a PIP, **MSRC** will handle inquiries using its judgment considering **MSRC**'s view of the overall best interests of the Covered Entity, restricting its remarks to factual information about the activities of **MSRC** and MSRC Subcontractors. In any event, **MSRC**'s officers also may respond to unsolicited inquiries by giving factual information about the activities of **MSRC** and MSRC Subcontractors, but will avoid speculation or expression of opinion about the Spill Event or the conduct of the Covered Entity in response to the Spill Event.

ARTICLE IV. LIMITS ON WHAT IS OFFERED

4.01. Excluded Services. **MSRC**'s services do not include: (1) Disposal of waste, including recovered Oil, oily waste, and any Hazardous Substances; (2) Source control; (3) Wreck removal; (4) Natural resource damage assessment; (5) Third-party damage claims evaluation or adjustment; (6) Acting as Incident Commander for the Covered Entity; (7) Development or preparation of Response Plans; or (8)

shoreline remediation performed in conjunction with the Natural Resource Trustees to restore the shoreline to its pre-spill condition, rather than as part of the cleaning process carried out under the oversight of the FOSC. However, if **MSRC** becomes involved in any of these activities, these activities will be governed by the terms and conditions of this Agreement.

4.02. Limits on Use by Covered Entity. The Resources provided under this Agreement will be used only for the Spill Event or exercise for which they were requested.

4.03. Personnel with Equipment. The Covered Entity may obtain the requested MSRC Response Equipment with or without MSRC Response Personnel, at the option of the Covered Entity. However, if **MSRC** reasonably believes, under the circumstances of a given event or request, that MSRC Response Personnel are required to ensure proper care, operation, and maintenance of certain MSRC Response Equipment as indicated in Schedule 3, **MSRC** may require that the MSRC Response Equipment be obtained only with the appropriate MSRC Response Personnel.

4.04. Acknowledgment of Representations and Conditions. The Initial Call-Out Notice will constitute an acknowledgment to **MSRC** that:

4.04(a). Representations and Warranties True and Correct. To the best actual knowledge of the **COMPANY,** each of the representations and warranties of the **COMPANY** set forth in Section 8.01 is true and correct in all material respects at the time of the Initial Call-Out Notice.

4.04(b). Conditions to Response Satisfied. The Covered Entity has made a good faith determination (based on the information reasonably available to the Covered Entity at the time) that the Spill Event meets or will meet each of the applicable restrictions or qualifications under Article II relating to the requested Resources, and the following criteria:

(i) No Event of Default exists at the time of the Initial Call-Out Notice:

(ii) For response in U.S. Jurisdictional Waters to a Discharge or threat of Discharge that equals or exceeds 1200 barrels, the FOSC is either Directing or monitoring the Response Activities at the Discharge or threat of Discharge where the Resources are to be deployed; and

(iii) The Covered Entity will be able to take, on a timely basis, all actions required in Article VII.

ARTICLE V. TERMINATION or SUSPENSION OF RESOURCES

5. 01. Suspension of MSRC's Obligation to Provide Resources. **MSRC** may suspend its obligation to provide Resources in whole or in part under this Agreement for a Spill Event upon written notice to the Covered Entity if and to the extent **MSRC** reasonably determines such suspension is necessary to protect **MSRC**'s material interests as a result of the occurrence and continuation of any of the following:

(a) a Covered Entity instructs **MSRC** to act under this Agreement in a manner which would be illegal, unsafe, or in violation of or breach this Agreement in any material respect,

(b) a Force Majeure Event,

(c) the unavailability of Responder Immunity,

(d) the unavailability of subcontractors essential to enable MSRC to provide requested Resources, or

(e) the existence of other similar circumstances beyond **MSRC**'s reasonable control that materially adversely affect MSRC's ability to perform as contemplated under this Agreement and that **MSRC** is unable with reasonable diligence to timely

resolve or overcome.

MSRC's suspension under this Section 5.01 of its obligation to provide specific Resources will not affect MSRC's obligation to provide any other Resources. To the maximum extent practicable, except as otherwise provided in Section 11.01, **MSRC** will provide the notice of suspension at least three (3) days' prior to the effective date of such suspension.

5. 02. Return of Resources. The Covered Entity will return all Resources upon completion of the response or earlier as required under this Agreement (i.e., upon an Event of Default or other termination). If the Covered Entity does not return any Resource when required, **MSRC** may demand and take immediate lawful possession of the Resource by any lawful means, wherever it may be found, even if it is not in the Covered Entity's possession.

ARTICLE VI. RESPONSE PREPARATION

6.01. Readiness and Response Certification

MSRC's Oil Spill Removal Organization ("OSRO") Classification RRI lists MSRC Response Personnel and MSRC Response Equipment that are available as Resources. **MSRC** has obtained and will maintain contractor USCG classification as a Class B, C, D, and E OSRO for Rivers/ Canals Environments, Inland Environments, and Oceans Environments (as defined by the USCG at the time of execution of this Agreement) for the capabilities described in its OSRO Classification RRI throughout the Operational Area. **MSRC**'s OSRO Classification RRI is available from **MSRC** upon request. Upon the Covered Entity's request, **MSRC** also will arrange, as set forth in and in accordance with the requirements of Part II of Schedule 3, for Resources on a standby basis to provide the coverage required under OPA for "Average Most Probable Discharge."

6. 02. Exercises and Response Plan Development by Covered Entity.

6. 02(a). Exercises. If Resources are available, a Covered Entity may obtain **MSRC**'s participation in exercises in accordance with the payment terms in Part III of Schedule 3.

6. 02(b). Response Plan Development. Each Covered Entity will have the sole responsibility for the content, accuracy, and adequacy of its Response Plans. A Covered Entity may name **MSRC** in any Response Plan as a contracted resource in **MSRC**'s Operational Area for a Covered Facility or Covered Vessel (named in the most current list provided under Section 6.03) only for those capabilities under Section 6.01 and only for an Oil Spill Event under the conditions described in Section 2.01, as applicable.

MSRC may not be named, without **MSRC**'s prior written consent, as a primary response contractor for any location outside the Operational Area, or as a "non-cascadable resource" in any location (meaning where **MSRC** Response Equipment would be restricted as to location rather than available for cascading to other locations).

MSRC may notify applicable Governmental Bodies periodically of the (i) names of the Covered Entities entitled to name **MSRC** in their Response Plans, and (ii) the capabilities available under this Agreement for which **MSRC** may be cited and the terms, conditions, and limitations of this Agreement. **MSRC** will provide a copy of any notice to a Governmental Body promptly to the **COMPANY**.

MSRC will not give advice on or approve the adequacy of any Response Plans. **MSRC** will provide, at the Covered Entity's request, information about the Resources to assist the Covered Entity in citing **MSRC** capabilities in its Response Plans. The Covered Entity is required to provide **MSRC** with a copy of each State Response Plan filed

by the Covered Entity with any Governmental Body which requires, as indicated in Schedule 4, by law or regulation that response contractors act consistently with Response Plans as a matter of law or as a condition to Responder Immunity. **MSRC** has no obligation to review any Response Plan, and **MSRC** is not responsible for any descriptions of **MSRC** that do not conform to the requirements of this Agreement.

6. 03. Operations and Authorized Representative. Upon the **COMPANY**'s execution of this Agreement and from time to time afterwards, the **COMPANY** will provide **MSRC** with an accurate list of all Covered Entities and their addresses, and all Covered Facilities and Covered Vessels of each Covered Entity that intend to identify Resources in their Response Plans. Upon the **COMPANY's** execution of this Agreement and from time to time afterwards, each Covered Entity also will provide **MSRC** with a current list of Authorized Representatives for that Covered Entity, their addresses, and telephone and telecopy numbers. **MSRC** may periodically provide to the **COMPANY MSRC**'s current list of Covered Entities, Covered Facilities and Covered Vessels, and Authorized Representatives, which the **COMPANY** will review, correct, and return promptly to **MSRC**.

ARTICLE VII. COMPENSATION AND PAYMENT

7. 01. Compensation and Payment. The Covered Entity will pay **MSRC** for Resources provided under this Agreement in accordance with the rates and terms in Part III of Schedule 3, as amended from time to time by **MSRC** upon sixty (60) days' prior written notice to the **COMPANY**, and as provided in this Section 7.01.

7.01(a) Invoicing. **MSRC** will invoice the Covered Entity at the address provided by the Covered Entity for Resources provided under this Agreement periodically as appropriate under the circumstances. In addition, **MSRC** will provide to the Covered Entity periodically **MSRC**'s good faith estimate of the total costs (including demobilization costs) of Resources being provided for a Spill Event under this Agreement.

7.01(b) Invoice Disputes. The Covered Entity will notify **MSRC** promptly and in reasonable detail of any objection by the Covered Entity to any item or statement on an invoice or the sufficiency of any supporting documentation. Any disputes that cannot be resolved by mutual agreement will be resolved by arbitration pursuant to Article X. The Covered Entity may withhold payment of any amount reasonably disputed by the Covered Entity, subject to **MSRC**'s rights under Section 7.01(c) below to require payment security. The payment of any invoiced amounts will not prejudice the Covered Entity's right, within one year following the date of invoice, to object to or question any invoiced amount. Any disputed amount shall accrue interest at the rate specified in Part III of Schedule 3 from the due date until paid to **MSRC** or refunded to the Covered Entity. If a dispute is resolved in favor of **MSRC** and the Covered Entity has withheld payment of the disputed amount, the Covered Entity will promptly pay to **MSRC** the disputed amount plus interest. If a dispute is resolved in favor of the Covered Entity and the Covered Entity has previously paid the disputed amount to **MSRC**, **MSRC** will promptly refund to the Covered Entity the disputed amount plus interest.

7.01(c) Payment. The Covered Entity will pay invoiced amounts by wire transfer of immediately available funds to an account designated by **MSRC** within ten (10) Business Days after presentment of the invoice. If at any time **MSRC** reasonably believes that it is at risk of not receiving payment in the amount and within the time required by this Agreement, **MSRC** may require the Covered Entity to provide a cash deposit, a parent guaranty or insurance letter of undertaking, or other form of payment security reasonably acceptable to **MSRC** in

an amount equal to all invoiced amounts due but unpaid plus **MSRC**'s good faith estimate of the total cost of Resources for the following fourteen (14) days of Response Activities, including demobilization costs, as a condition to **MSRC** providing or continuing to provide Resources.

7.02. Return of MSRC Response Equipment. The Covered Entity will arrange and pay for cleaning, repairing, and replacing, as necessary, all MSRC Response Equipment provided under this Agreement so that the equipment is free of Oil and Hazardous Substances and in as good a condition, operating order, and repair as when initially provided by **MSRC**, except for ordinary wear and tear. If practicable, the Covered Entity will arrange for the cleaning of the MSRC Response Equipment within the Response Area. **MSRC** may clean and repair or replace the MSRC Response Equipment at the Covered Entity's expense if the Covered Entity fails to timely perform its obligations under this Section 7.02 or upon agreement between the Covered Entity and **MSRC** in other circumstances as appropriate.

7.03 Audit. The Covered Entity, or any firm of auditors designated by the Covered Entity, will have reasonable access to and the right to reproduce the Records necessary to verify the accuracy of **MSRC**'s invoices, at times and under circumstances mutually acceptable to the Covered Entity and **MSRC** and at the Covered Entity's expense.

ARTICLE VIII. REPRESENTATIONS, WARRANTIES, AND GENERAL TERMS AND CONDITIONS

8.01. Representations and Warranties. The **COMPANY** and **MSRC** each agree to give the other party written notice promptly if that party obtains actual knowledge that any representation or warranty made by that party in this Article VIII proves to be untrue or incorrect in any material respect. The **COMPANY** and **MSRC** each hereby represents and warrants about itself to the other at all times during the term of this Agreement as follows:

8. 01(a). Validity and Enforceability. This Agreement has been duly executed and delivered by and to the **COMPANY** and **MSRC**, respectively, and constitutes a valid and binding obligation of the **COMPANY** and **MSRC**, respectively, enforceable against each in accordance with the Agreement's terms except as limited by applicable bankruptcy, insolvency, liquidation, rehabilitation, reorganization, or similar laws of general application relating to or affecting the rights and remedies of creditors or by general equitable principles.

8. 01(b). Capacity and Authority. Each of the **COMPANY** and **MSRC**, respectively, has full capacity and authority under law to contract with the other and to perform its respective obligations under this Agreement.

8. 01(c). No Restrictions. The execution, delivery, and, to the best of the actual knowledge of the executive officers of the **COMPANY**, performance by the **COMPANY** of its obligations and the consummation by the **COMPANY** of the Agreement's transactions will not violate any provision of any **COMPANY** charter or organizational documents and will not violate any statute, law, or regulation of any jurisdiction existing as of this date where that violation would have a material adverse effect on the ability of the **COMPANY** to fulfill its obligations under this Agreement.

The execution, delivery, and, to the best of the actual knowledge of the executive officers of **MSRC**, performance by **MSRC** of its obligations and the consummation by **MSRC** of the Agreement's transactions will not violate any provision of any charter or organizational documents of **MSRC** and will not violate any statute, law, or regulation of any jurisdiction existing as of this date where that violation would have a material adverse effect on the ability of **MSRC** to fulfill its obligations under this Agreement.

8. 01(d). Due Organization. The **COMPANY** is duly organized, validly existing, and in good standing under the laws of the jurisdiction in which it was organized. **MSRC** is a duly organized nonprofit corporation, validly existing and in good standing under the laws of Tennessee, and is duly qualified as a foreign corporation in all jurisdictions where the property owned or business transacted by it makes that qualification necessary.

8. 01(e). Financial Responsibility. The **COMPANY** is in compliance with all of its obligations under Section 9.05.

8. 01(f). MPA Membership. Either the **COMPANY** is an MPA Member in good standing or the **COMPANY** is an affiliate of an MPA Member in good standing entitled to the benefits of membership in MPA pursuant to the MPA By-Laws.

8. 02. Independent Clean-up Operations. The Covered Entity may obtain services, equipment, and personnel to substitute for or supplement the Resources available under this Agreement, at the Covered Entity's sole direction, cost, and expense.

8. 03. MSRC Employees. The Covered Entity may not select, discharge, or, except as required under Sections 3.01(a) and 3.06, control **MSRC**'s employees, servants, or representatives. **MSRC** will not employ any Person under eighteen (18) years old to perform potentially dangerous Response Activities under this Agreement. Upon the reasonable request of the Covered Entity, **MSRC** will remove an employee of **MSRC** or an **MSRC** Integral Subcontractor from Response Activities under this Agreement. **MSRC** will implement and maintain a drug and alcohol policy for **MSRC** in compliance with the law of the jurisdiction where **MSRC** personnel are stationed permanently. **MSRC** will provide a copy of its drug and alcohol policy to the **COMPANY** upon request.

8. 04. Compliance with Certain Executive Orders. To the extent that there is a final, non-appealable order stating that any Executive Orders relating to Government subcontractors apply to **MSRC** because of the contractual relationship between **MSRC** and the **COMPANY**, **MSRC** will comply with that final order. **MSRC** will not discriminate unlawfully in its hiring practices on the basis of race, religion, color, national origin, age, sex, mental or physical handicap, or veteran status.

8. 05. Compliance with the Law for Subcontractors. **MSRC** will include in its contracts with **MSRC** Subcontractors a provision requiring those subcontractors to abide by and observe all applicable Federal, state, and local laws, rules, and regulations.

8. 06. Taxes. **MSRC** will pay all valid taxes and fees owed due to providing MSRC Response Equipment or MSRC Response Personnel under this Agreement. The Covered Entity will reimburse **MSRC** for any taxes paid by **MSRC** that are directly attributable to Resources provided under this Agreement. **MSRC** will cooperate with the directions of the Covered Entity to take all reasonable actions, at the cost and expense of the Covered Entity, to contest any taxes reimbursable by the Covered Entity.

8. 07. Maintenance of Records. **MSRC** will maintain for three (3) years (or longer as required by law) all Records acquired or produced by **MSRC** in connection with providing Resources under this Agreement. **MSRC** will continue to maintain Records beyond that three (3) year period upon the Covered Entity's agreement to pay all costs of doing so.

ARTICLE IX. ALLOCATION OF RISKS

9. 01. Standard of MSRC Performance. The parties agree that the standard governing each of **MSRC**'s obligations under this Agreement will be to use commercially reasonable efforts consistent with applicable spill response industry practices considering available

information and available resources under circumstances, conditions (including weather and sea conditions), and factors existing at any relevant time. **MSRC** will provide Resources requested by a Covered Entity pursuant to this Agreement in a manner that attempts to mitigate, remove, or clean up the applicable Discharge as effectively as practicable under existing circumstances.

Subject only to the first paragraph of this Section and Section 8.01, **MSRC** EXPRESSLY DISCLAIMS AND EXCLUDES, AND THE **COMPANY** ACKNOWLEDGES AND AGREES (ON BEHALF OF ITSELF AND EACH COVERED ENTITY), TO THIS DISCLAIMER AND EXCLUSION AND WAIVES (ON BEHALF OF ITSELF AND EACH COVERED ENTITY), ALL WARRANTIES, STANDARDS, AND GUARANTEES, WHETHER EXPRESS OR IMPLIED, ARISING BY OPERATION OF LAW OR OTHERWISE, INCLUDING ANY WARRANTY OF MERCHANTABILITY OR FITNESS FOR A PARTICULAR USE OR PURPOSE, WITH RESPECT TO ANY RESOURCES.

9. 02. MSRC Status and Employees. Notwithstanding the Covered Entity's right to direct Resources under this Agreement, **MSRC** will be and will remain an independent contractor acting under the direction of the Covered Entity at all times during its provision of Resources under this Agreement. The parties do not intend this Agreement to create any other relationship between **MSRC** and the **COMPANY** or any Covered Entity, including that of master/servant, employer/employee, partners, or joint venturers.

9. 03. INDEMNIFICATION AND EXCLUSIVE REMEDY.

9.03(a) Nature of Relationship. **MSRC** and the **COMPANY** recognize and agree that, in connection with providing the Resources under this Agreement and in furtherance of the express public policy goals underlying OPA and other laws to facilitate prompt and effective response to Spill Events: (a) **MSRC** is a nonprofit and tax-exempt corporation providing services to promote the welfare of the public; (b) any Resources provided under this Agreement are for the sole benefit of the **COMPANY** or the Covered Entity; (c) the extraordinary and emergency nature of providing Resources may require actions by **MSRC** and **MSRC** Integral Subcontractors that may give rise to a variety of Claims; (d) **MSRC** has based the charges for and availability of the Resources to be provided under this Agreement on the premise that the **COMPANY**, or anyone asserting rights on its behalf, will not challenge **MSRC**'s right to be indemnified as provided in this Section 9.03. Accordingly, **MSRC** and the **COMPANY** fully understand and recognize and agree that the nature of the Resources to be provided under the terms set forth in this Agreement make it appropriate, equitable and essential to provide for the allocation of the risks and liabilities, limitation of remedies, and the indemnification of **MSRC** and the **MSRC** Integral Subcontractors as set forth in this Section 9.03.

THE COMPANY EXPRESSLY RECOGNIZES AND ACCEPTS ITS OBLIGATIONS ARISING UNDER SECTION 12.08 FOR INDEMNIFICATION AS SET FORTH IN THIS SECTION 9.03.

9.03(b) COVER INDEMNIFICATION. SUBJECT TO THE PROVISIONS OF SECTIONS 9.03(d) AND (e) BELOW, IT IS AGREED THAT THE COVERED ENTITY WILL DEFEND, INDEMNIFY AND HOLD HARMLESS THE INDEMNITEES AND EACH OF THEM, AGAINST AND FROM ANY AND ALL LOSSES, LIABILITIES, DAMAGES, COSTS AND EXPENSES OF ANY SUCH INDEMNITEES RELATED TO ANY CLAIM ARISING OUT OF, OR IN ANY MANNER CONNECTED WITH, **MSRC**'S PERFORMANCE OF OR ALLEGED FAILURE TO PERFORM ITS OBLIGATIONS UNDER THIS AGREEMENT AS A RESULT OF A SPILL

EVENT WHERE THE INDEMNITEE DEMONSTRATES THAT THE **COMPANY**, OR ANY APPLICABLE COVERED ENTITY, COULD HAVE BEEN LIABLE IF SUED DIRECTLY OR DID OR DOES HAVE A LIABILITY FOR OR WITH RESPECT TO SUCH CLAIM UNDER OPA OR ANY OTHER APPLICABLE FOREIGN, FEDERAL, STATE OR LOCAL LAW (WHETHER STATUTORY OR COMMON) AND IRRESPECTIVE AS TO WHETHER SUCH LIABILITY WOULD BE CONSIDERED DIRECT, INDIRECT, CONCURRENT, JOINT, PRIMARY, SECONDARY, VICARIOUS OR DERIVATIVE OF THE LIABILITY OF ANY INDEMNITEE WITH RESPECT TO SUCH CLAIM. IF THE COVERED ENTITY PROVIDING AN INITIAL CALL-OUT NOTICE IS NOT THE "RESPONSIBLE PARTY" FOR THE APPLICABLE DISCHARGE AS DEFINED IN OPA, THE LIABILITY OF THE COVERED ENTITY FOR THE PURPOSES OF THIS SECTION 9.03(b) SHALL INCLUDE THE LIABILITY OF SUCH "RESPONSIBLE PARTY".

9.03(c) INDEMNIFIED CLAIMS. UNLESS OTHERWISE SPECIFICALLY EXCLUDED BY SECTION 9.03(d), THE OBLIGATIONS OF THE COVERED ENTITY UNDER SECTION 9.03(b) SHALL INCLUDE, WITHOUT LIMITATION, ANY CLAIM ARISING OUT OF, OR IN ANY MANNER DIRECTLY OR INDIRECTLY CONNECTED WITH, THE FOLLOWING:

(i) THE PROVISION, MOBILIZATION, DEPLOYMENT OR DEMOBILIZATION OF RESOURCES UNDER THIS AGREEMENT OR THE FAILURE TO PROVIDE, MOBILIZE, DEPLOY OR DEMOBILIZE SUCH RESOURCES;

(ii) THE PERMANENT OR TEMPORARY TERMINATION OR SUSPENSION OF **MSRC**'S PERFORMANCE OF OR PROVISION OF RESOURCES OR THE TERMINATION OF THIS AGREEMENT BY **MSRC**, PROVIDED THAT SUCH SUSPENSION OR TERMINATION IS IN ACCORDANCE WITH THE TERMS OF THIS AGREEMENT;

(iii) THE ASSERTION OF RESPONDER IMMUNITY BY **MSRC** OR ANY OTHER PERSON;

(iv) **THE NEGLIGENCE OF MSRC OR ANY INDEMNITEE, INCLUDING A NEGLIGENT DEFAULT OR BREACH BY MSRC OF ITS OBLIGATIONS UNDER THIS AGREEMENT;**

(v) ANY CLAIM FOR PERSONAL INJURY OR WRONGFUL DEATH OF PERSONS WHO ARE EMPLOYEES OR INVITEES OF THE **COMPANY**, OR ANY COVERED ENTITY, ON THE VESSEL OR FACILITY THAT IS THE SOURCE OF THE SPILL EVENT, OR ANY MSRC SUBCONTRACTORS (OTHER THAN MSRC INTEGRAL SUBCONTRACTORS) OR OTHER SUBCONTRACTORS OF THE **COMPANY** OR ANY COVERED ENTITY;

(vi) ANY RISKS OR LIABILITIES CONCERNING OR RELATED TO THE TRANSPORTATION, STORAGE, TREATMENT OR DISPOSAL OF RECOVERED OIL, HAZARDOUS SUBSTANCES OR ANY WASTE WHEN COLLECTED, RECOVERED OR GENERATED AS A RESULT OF, OR WHEN USED IN, PROVIDING RESOURCES, OTHER THAN ANY GARBAGE OR REFUSE INCIDENTALLY GENERATED BY **MSRC** IN ITS OWN OPERATIONS; AND

(vii) INFRINGEMENT BY THE **COMPANY** OR BY A COVERED ENTITY (OR **MSRC** THROUGH THE USE OF EQUIPMENT, PROCESSES OR OTHER PROPERTY OWNED OR OPERATED BY OR PROVIDED BY OR ON BEHALF OF THE **COMPANY** OR A COVERED ENTITY BUT EXCLUDING **MSRC**'S OWN EQUIPMENT) OF ANY PATENT, COPYRIGHT, TRADEMARK, OR

SERVICE MARK OR MISAPPROPRIATION OF ANY PROPRIETARY INFORMATION OR TRADE SECRETS.

9.03(d) Excluded Obligations. The obligations of the Covered Entity under Sections 9.03(b) and (c) shall not include and shall not apply to:

(i) the extent (but only to the extent) that applicable law would render such indemnity or hold harmless agreement void or unenforceable:

(ii) the extent that any Claim is caused by any Indemnitee's gross negligence or willful, reckless, or criminal misconduct:

(iii) the portion of any Claim for which an insurer of **MSRC** recognizes or otherwise has an obligation to pay under the applicable policy or cover:

(iv) any portion of a Claim arising from or related to services or equipment provided by **MSRC** to a Spill Event other than pursuant to this Agreement including services or equipment provided by **MSRC** to a Spill Event after the Covered Entity has, pursuant to this Agreement, terminated the services of **MSRC** under this Agreement at such Spill Event;

(v) any Claim for personal injury or wrongful death of Persons who are employees of **MSRC** or **MSRC** Integral Subcontractors:

(vi) any portion of a Claim with respect to a Spill Event where the payment of such portion of the Claim would cause the aggregate of (i) the amount of any payments actually made by or on behalf of the **COMPANY** or the Covered Entity to or on behalf of any Indemnitees under this Agreement or any MSRC Subcontractors pursuant to Section 9.03(i) with respect to such Spill Event and (ii) the amount of any payments made by or on behalf of the **COMPANY** or the Covered Entity for removal costs or damages under OPA with respect to such Spill Event, to exceed the Cap with respect to such Spill Event, whether or not under OPA or any other applicable law or regulation or in any proceeding the Cap can be maintained by the **COMPANY** or the Covered Entity; provided that the restrictions of this Section 9.03(d)(vi) shall not apply to any Claim for which the **COMPANY** or the Covered Entity has previously assumed the defense of such Claim under Section 9.03(e); or

(vii) any portion of a Claim with respect to which an Indemnitee has successfully maintained an immunity from liability under any applicable provision of OPA or other foreign, Federal or state law; provided, however, that the exclusion under this Section 9.03(d)(vii) shall not apply to costs (including attorneys' fees) incurred by the Indemnitee in asserting said immunity.

9.03(e). Procedure for Indemnification with Respect to Third Party Claims. The obligations and liabilities of the **COMPANY** or the Covered Entity with respect to Claims resulting from the assertion of liability by a Person other than an Indemnitee (a "Third Party") against such Indemnitee (for the purposes of this Section 9.03, "Third Party Claims") shall be subject to the following terms and conditions:

(i) The Indemnitee shall be obligated to give prompt (but in no event greater than sixty (60) days) written notice to the Covered Entity (and **MSRC** if the Indemnitee is not **MSRC**) of any Third Party Claim which is subject to the indemnification of the Covered Entity under this Section 9.03, stating the nature and basis of the Claim, and the amount thereof, to the extent known. Within thirty (30) days of the giving of such notice, the Covered Entity shall do one of the following: (a) satisfy the Claim, (b) assume the defense of such Claim by written notice to the Indemnitee (and **MSRC**, if the Indemnitee is not **MSRC**) and by executing a litigation indemnity in form and substance reasonably acceptable to the Indemnitee (including an acknowledgment of the waiver by the Covered Entity of the applicability of

Sections 9.03(d)(vi) and (vii) with respect to such Claim), or (c) request by written notice to the Indemnitee (and **MSRC**, if the Indemnitee is not **MSRC**) that either **MSRC** or the Indemnitee assume the defense of the Claim; provided, however, that the Covered Entity shall not have the right to assume the defense of a Third Party Claim if the Covered Entity does not perform the indemnification obligations under this Section 9.03 or the payment obligations under Section 7.01, and the **COMPANY** shall not have the right to assume the defense of a Third Party Claim in the event of a breach or anticipatory breach by the **COMPANY** of the indemnification obligations under this Section 9.03 or the payment obligations under Section 7.01.

(ii) If the Covered Entity has requested that **MSRC** or the Indemnitee assume the defense of a Third Party Claim, **MSRC** or the Indemnitee, as the case may be, shall be entitled to select its own counsel in connection with such Claim. If the Covered Entity elects to defend any such Claim, the Covered Entity shall make available to **MSRC** all reports or other documents relating to the defense of the Claim and allow **MSRC**, at its cost, to participate in meetings or conversations relating to the defense of the Claim; however, if **MSRC** or the Indemnitee should elect to have its own counsel in connection with monitoring the defense of any such Claim or otherwise to represent the interests of the Indemnitee, particularly with respect to the rights of the Indemnitee to be indemnified by the Covered Entity under this Section 9.03, the costs of such counsel shall be borne by the Indemnitee. If **MSRC** or the Indemnitee assumes the defense of a Third Party Claim, for so long as the **COMPANY** or the Covered Entity has an obligation to indemnify the Indemnitee, **MSRC** or the Indemnitee shall make available to the **COMPANY** or the Covered Entity, as the case may be, all reports or other documents relating to the defense of the Claim and allow the Covered Entity, at its cost, to monitor meetings and conversations relating to the defense of the Claim. If there is more than one Indemnitee, the Indemnitees shall be entitled to have one joint counsel, at their cost, in connection with such Claim to monitor the defense or otherwise represent the interests of all such Indemnitees, which counsel shall be selected by **MSRC**. If **MSRC** assumes the defense of a Third Party Claim, the Covered Entity shall be obligated to pay the invoiced reasonable fees and expenses of counsel for **MSRC** or the Indemnitee, as the case may be, as such fees and expenses are incurred. Unless otherwise required to protect the right of the Indemnitee to be indemnified by the Covered Entity, the Indemnitee shall be obligated to cooperate fully in any defense to a Claim conducted by the Covered Entity. Any party defending any Claim shall assert any exemption or immunity from liability that may be available, including, without limitation, any Responder Immunity.

(iii) So long as the Covered Entity is defending, the Indemnitee shall not compromise or settle any such Claim without the prior written consent of the Covered Entity, and, if the Indemnitee should object to any compromise or settlement of such a Claim acceptable to the Covered Entity, such Indemnitee shall thereafter assume the costs of defending the Claim and the Covered Entity's obligations with respect to such Claim shall be limited to the compromise or settlement that was acceptable to the Covered Entity. If **MSRC** or the Indemnitee is defending such Claim, the party defending such Claim shall consult with the Covered Entity concerning any compromise or settlement but shall be entitled to compromise or settle such Claim without the prior consent of the Covered Entity, but if the Covered Entity objects to that compromise or settlement, the Covered Entity can assume the defense provided that the Covered Entity secures its obligation to defend and pay such Claim in a manner satisfactory to **MSRC**, and Sections 9.03(d)(vi) and (vii) are no longer applicable to such Claim.

9.03(f). Procedure for Indemnification with Respect to Claims other than Third Party Claims. Any judicial or non-judicial application or proceeding for indemnification

from the **COMPANY** or the Covered Entity under this Section 9.03 for any Indemnitee for a Claim that is not a Third Party Claim can only be commenced, administered or processed by **MSRC**, for the account and benefit of the Indemnitee on whose behalf an application for indemnification under this Section 9.03 was submitted to the Covered Entity by **MSRC**: provided, however, that if **MSRC** is legally or otherwise unable to commence, administer or process such application or proceeding on behalf of an Indemnitee, such Indemnitee may commence and process such proceeding against the Covered Entity directly.

9.03(g). No Waiver. Nothing in this Agreement or this Section 9.03 shall constitute a waiver or limitation of the rights of **MSRC** with respect to Responder Immunity or any other statutory or common law defense to or limitation of liability of the **COMPANY** or Covered Entity resulting therefrom.

9.03(h). MSRC Integral Subcontractors as Indemnitees. Only **MSRC** Integral Subcontractors actually listed by name in Schedule 6, as such Schedule may be amended pursuant to Section 11.05 (but not any subcontractors not so listed by name even if such subcontractors provide services of the type provided by an **MSRC** Integral Subcontractor), are entitled to the benefits provided to Indemnitees pursuant to Sections 9.03(a) through (g).

9.03(i). Indemnity to MSRC Subcontractors. The **COMPANY** hereby irrevocably designates, appoints and authorizes **MSRC** as its agent to execute and deliver an indemnification agreement in the form of Schedule 5 hereto, as **MSRC**, with the concurrence of MPA may elect, on behalf of the **COMPANY** and the Covered Entity to any MSRC Subcontractor (other than an MSRC Integral Subcontractor). The MSRC Subcontractors to which MSRC is permitted to extend such indemnification are set forth in Schedule 5A, as such Schedule may be amended by **MSRC** with the concurrence of MPA and which amendment will be effective immediately upon written notice by **MSRC** to the **COMPANY**.

9.04. Covenant Not to Sue.

9.04(a). Release of Liability. The **COMPANY**, on behalf of itself and each Covered Entity, in recognition of the accommodation and special circumstances of **MSRC** described in Section 9.03(a), hereby irrevocably releases and forever discharges the Indemnitees other than the **MSRC** Integral Subcontractors (those Indemnitees other than MSRC Integral Subcontractors are referred to in this Section as the "MSRC Indemnitees") from liability for any and all Claims whatsoever, including but not limited to Claims for contribution, breach of contract, tort, or otherwise, or any Claims arising from the negligence or gross negligence of the MSRC Indemnitees, that the **COMPANY** or the Covered Entity currently has or may have against the MSRC Indemnitees arising from, related to, or in connection with this Agreement.

9.04(b). Other Claims. The **COMPANY**, on behalf of itself and each Covered Entity, also covenants and agrees that neither the **COMPANY** nor any Covered Entity will (i) file a cross-claim or counter-claim against the MSRC Indemnitees or (ii) assert the legal liability of any MSRC Indemnitee as a defense in any formal pleadings in any legal proceeding arising from, related to, or in connection with this Agreement or concerning any Claim brought by any Person other than an Indemnitee against the **COMPANY** or the Covered Entity related to a Spill Event. This Section will not be construed in any way to limit, restrain, or prohibit the making of any factual statements by any Person in any pleading, argument, filing, affidavit, deposition, or testimony in any such legal proceeding.

9.04(c). Exceptions. Sections 9.04(a) and 9.04(b) will not preclude the **COMPANY** from pursuing Claims (i) under the arbitration provisions of Article X regarding disputes related to payment for

MSRC's services under this Agreement, (ii) seeking injunctive relief or specific performance or (iii) under the arbitration provisions of Article X arising from the willful, reckless, or criminal misconduct of the MSRC Indemnitees.

9.04(d). Breach. If this Section 9.04 at any time is breached by the **COMPANY** or any Covered Entity (including a breach because an allegation of willful, reckless, or criminal misconduct is not ultimately determined by a final decision or order of the party adjudicating any dispute to have been correct), the **COMPANY** and Covered Entity will be jointly and severally liable for any incidental or consequential damages of an MSRC Indemnitee arising from or related to that breach, including without limitation any and all attorneys' fees and expenses incurred by an MSRC Indemnitee in defending any litigation resulting from that breach. That liability will not be limited in amount by any other provision of this Agreement.

9.04(e). Full Force and Effect. This Section 9.04 will remain in full force and effect notwithstanding the existence of any breach or default by **MSRC** of its obligations under this Agreement, or the expiration or earlier termination of this Agreement.

9. 05. Financial Responsibility. The **COMPANY** covenants and agrees to comply with the provisions of Schedule 2.

9. 06. Insurance.

9. 06(a). MSRC Insurance. MSRC will obtain and maintain at its sole cost during the term of this Agreement the insurance coverage described in Schedule 7, as such Schedule may be amended by **MSRC** with the concurrence of MPA and which amendment will be effective immediately upon written notice by **MSRC** to the **COMPANY**.

9.06(b). Subcontractor Insurance. MSRC will require in its contracts with all **MSRC** Subcontractors that all those subcontractors provide to **MSRC** evidence of insurance coverage maintained by each contractor that in the reasonable judgment of **MSRC** is customary in the industry of such subcontractor.

9.06(c). Role of MSRC Insurance. As set forth in Section 9.03(d)(iii), the recognition of its obligation to pay by an insurer of **MSRC** for any portion of a Claim relieves the Covered Entity of its indemnification obligation under Section 9.03(b) with respect to such portion of the Claim. However, if an Indemnitee does not ultimately receive payment on an indemnified Claim from an insurer of **MSRC**, the Covered Entity will be obligated to pay that Claim in accordance with the terms of this Article IX. After the making of that payment, the Covered Entity will be subrogated to the rights of **MSRC** and the Indemnitee to seek recovery for that portion of the Claim from the insurer. **MSRC** and the Indemnitee will cooperate fully with the Covered Entity in seeking recovery from any such insurer. Any right of the Covered Entity to assume the defense of a Claim from **MSRC** or an Indemnitee pursuant to Section 9.03 will be subject to the rights and duties of an insurer of **MSRC** that has acknowledged coverage for that Claim to participate in or assume the defense of the Claim.

9. 07. No Third-Party Beneficiaries. This Agreement is solely for the benefit of **MSRC** and the **COMPANY**, and no third party will have any interest, Claim, or right to enforce any provision of this Agreement against either **MSRC** or the **COMPANY**, except for the rights of Indemnitees to enforce the Covered Entity's indemnity of those Indemnitees under Section 9.03.

ARTICLE X. ARBITRATION AND DISPUTE RESOLUTION

10. 01. Inform and Negotiate. **MSRC** and the **COMPANY** will each use its best efforts to inform the other party by written notice promptly following the later of the occurrence or the discovery of any such occurrence of any issue or event that the party

knows has raised a dispute under this Agreement. The **COMPANY** and **MSRC** will try to resolve any disputed matter by negotiation. If the dispute is not resolved to the satisfaction of a party, that party will deliver a written notice of Claim to the other party.

10. 02. Arbitration. If **MSRC** and the **COMPANY** are unable to agree upon a settlement of any matter, the matter will be subject to arbitration in accordance with the provisions of Schedule 9. If the arbitration could not timely achieve a requested injunctive remedy, or if the matter involves an issue where the only remedy under this Agreement is specific performance, either party may commence an action solely for preliminary injunctive relief. Any other dispute or Claim arising out of or relating to this Agreement will be settled exclusively and finally by arbitration. Any decision or award of the arbitral tribunal will be final and binding upon the parties to the arbitration proceeding.

10. 03. Continued Performance. Each party will continue to perform its obligations under this Agreement without deduction, set-off, or any other charges of any nature whatsoever and without prejudice to its position in any pending dispute. Each party will retain its rights to terminate or suspend the provision of Resources under this Agreement.

10. 04. Jurisdiction. Any judicial action or proceeding between the **COMPANY** and **MSRC** directly or indirectly connected with and permitted under this Agreement will be brought in the United States District Court for the Southern District of New York if that court has subject matter jurisdiction, and in all other cases in the Supreme Court of the State of New York, County of New York. The **COMPANY** and **MSRC** each consent to process being served in any manner permitted by law.

10. 05. Enforceable Award. Any award in an arbitration may be enforced against the parties to the arbitration or their assets, wherever found. Judgment upon an arbitration award may be entered in the United States District Court for the Southern District of New York.

10. 06. Requirements for All Persons. Indemnification under Section 9.03 is contingent on the Indemnitee abiding by the provisions of this Article X.

ARTICLE XI. TERM AND AMENDMENT OF AGREEMENT

11. 01. Full Termination by MSRC.

11. 01(a). Events of Default. If any of the following events occurs and is continuing, it is an "Event of Default":

(i) Any of the **COMPANY** representations and warranties in Section 8.01 prove to be untrue or incorrect in any material respect:

(ii) Any **COMPANY** Insolvency Event occurs;

(iii) The **COMPANY** fails to satisfy any of this Agreement's payment obligations (including the obligations in Article VII) in an aggregate amount in excess of $100,000, fails to pay any disputed **MSRC** invoices in an aggregate amount **MSRC** reasonably considers to be a problem for the funding of **MSRC**'s operations or readiness, or fails to provide security for payment in accordance with Section 7.01:

(iv) The **COMPANY** or a Covered Entity engages in a pervasive pattern of illegal or knowingly unsafe practices in directing Response Activities performed or provided under this Agreement; or

(v) The **COMPANY** breaches its material obligations under this Agreement, other than the obligations under (i), (iii), and (iv) above, and that breach is not cured within thirty (30) days after written notice from **MSRC** specifying that breach.

11. 01(b) MSRC Termination of Resources. Upon an Event of Default **MSRC** may terminate Resources to the Covered Entity with at least twenty-four (24) hours (or 48 hours if the Event of Default is a failure to pay under Section 11.01(a)(iii)) prior notice to the Covered Entity and, if applicable, the FOSC. **MSRC** may withdraw all Resources from the Spill Event when the notice period expires. **MSRC** also may terminate Resources without any notice if any of the **COMPANY**'s representations or warranties in Section 8.01(e) or (f) prove to be materially untrue or incorrect or if it has an Insolvency Event (Section 11.01(a)(ii)).

The Covered Entity must pay **MSRC** costs incurred after termination only for demobilizing, on a reasonable schedule, **MSRC** Response Personnel, **MSRC** Response Equipment, and any (unassigned) MSRC Subcontractor from the Spill Event, and for any cleaning, repair, or maintenance of MSRC Response Equipment required under Section 7.02.

11. 01(c). Reinstatement Option. **MSRC** may, in its discretion after an Insolvency Event (Section 11.01(a)(ii)) reinstate Resources, upon the Covered Entity's compliance with MSRC's request for payment security under Section 7.01(c).

11. 02. Covered Entity Termination of Resources. The Covered Entity may terminate, in whole or in part at any time, Resources being provided under this Agreement by written notice to **MSRC**.

11. 03. Term of the Agreement.

11. 03(a). Term. This Agreement is effective on or after October 15, 1996, and it will continue until December 31, 1997, or until the earlier termination pursuant to the provisions of Sections 11.03(b) or 11.03(c). This Agreement will continue automatically for successive periods of three (3) years unless either party gives the other party notice of termination at least ninety (90) days before the date of expiration of the term.

11. 03(b). MSRC Termination of Agreement. If any Event of Default occurs and continues **MSRC** may, in addition to its right to terminate Resources pursuant to Section 11.01(b) and any other rights and remedies under this Agreement and at law or in equity, terminate this Agreement in its entirety by providing the **COMPANY** with at least ninety (90) days prior written notice.

MSRC is also entitled to terminate this Agreement upon thirty (30) days notice if

(i) **MSRC** has liquidated assets to pay Claims against **MSRC** and therefore cannot provide the contemplated level of Resources, or

(ii) **MSRC** has not received the required payments at the times required under the Directors and Officers Indemnification Grant and Security Agreement, as amended (dated as of July 16, 1993 by and between **MSRC** and MPA concerning the indemnification of the executive officers and directors of **MSRC**); the **COMPANY** or a **COMPANY** affiliate has not made the payments at the times required under the Supplemental Dues Call Agreement, as amended (by and between MPA and the **COMPANY** or a **COMPANY** affiliate, relating to supplemental dues calls by MPA to support MPA's obligations under the Directors and Officers Indemnification Grant and Security Agreement, as amended); or **MSRC** has not received the required payments at the times required under the Legal Costs Grant Agreement (dated July 9, 1993 by and between MPA and **MSRC**, as amended, relating to payment of certain legal defense costs), or

(iii) those agreements described in (ii) above are not in full force and effect and the **COMPANY** and MPA are not in compliance in any material respect under those agreements.

11. 03(c). COMPANY Termination of Agreement. In addition to the right of the Covered Entity to terminate the provision of Resources pursuant to Section 11.02, the

COMPANY may terminate this Agreement in its entirety, including, as a consequence of such termination, the termination of all Resources then being provided to a Spill Event, at any time by providing **MSRC** with at least sixty (60) days written notice.

11. 03(d). Provisions Surviving Termination. Upon termination of this Agreement, the provisions of Sections 3.05, 3.06, 3.07, 5.02, 8.07, 9.01, 9.03(a)-(h), 9.04, 9.07, 11.04, 12.01, 12.03, 12.04, and Articles VII and X will survive the termination of this Agreement in accordance with its terms. The provisions of Section 9.05 will survive any termination until eighteen months after (A) all Covered Entity-required Article VII payments are made or (B) there is no unsatisfied pending Claim against **MSRC** related to this Agreement (other than Claims arising out of the execution and delivery of this Agreement) remaining outstanding, whichever date is later.

11. 04. Successors and Assigns. This Agreement will be binding upon and inure to the benefit of the successors and assigns of this Agreement's parties. Any assignment by the **COMPANY** will be valid only if the assignee satisfies all of the **COMPANY**'s obligations under this Agreement existing at the date of the assignment and if the assignee concurrently executes an agreement with **MSRC** assuming all obligations of the **COMPANY** under this Agreement.

11. 05. Modification and Waiver.

11. 05(a). Prior Understandings and Amendment. This Agreement supersedes all previous or contemporaneous agreements, understandings and correspondence between the parties regarding this Agreement's subject matter and, together with all exhibits, schedules, and addenda, constitutes the entire agreement.

This Agreement may be amended during its term by a written instrument approved by MPA according to the approval of amendments under the Grant Agreement (dated July 17, 1991, as amended, between **MSRC** and MPA). The **COMPANY** may terminate this Agreement pursuant to Section 11.03(c) if it objects to an amendment of this Agreement pursuant to these procedures.

11. 05(b). Waiver. No benefit or right accruing to either party under this Agreement will be waived unless the written waiver is signed by both parties to this Agreement. A waiver in one instance of any act, condition, or requirement stipulated in this Agreement will not constitute a continuing waiver or a waiver of any other act, condition, or requirement, or a waiver of the same act, condition, or requirement in other instances, unless specifically so stated.

ARTICLE XII. CONTRACT INTERPRETATION

12. 01. Notices. Any notice required or permitted to be delivered under this Agreement is deemed made upon acknowledgment of receipt when sent by United States mail, or facsimile, or when the notice is delivered in person to a party's contact by name, title, address or facsimile as set forth under the signature of the parties (or as expressly provided otherwise in this Agreement). Both the **COMPANY** and **MSRC** may designate additions or changes in contacts in writing as necessary. Oral notice will be sufficient if promptly confirmed in writing.

12. 02. Counterparts and Severability.

12. 02(a). Counterparts as Originals. The parties may execute this Agreement in any number of counterparts, intending each counterpart to serve as an original.

12. 02(b). Enforceability not Impaired. If any provision of this Agreement is determined to be invalid, illegal, or unenforceable, the validity, legality, or enforceability of the remaining provisions will not in any way be affected or

impaired.

12. 03. GOVERNING LAW. THIS AGREEMENT WILL BE GOVERNED IN ALL RESPECTS BY THE LAWS OF THE STATE OF NEW YORK, INCLUDING THE CHOICE OF LAW RULES OF THE STATE OF NEW YORK.

12. 04. Private Contract. The **COMPANY** and **MSRC** agree that this Agreement is a private contract and should not be construed or interpreted to be a public contract or a private contract creating public duties.

12. 05. Standard Contract. The terms and conditions of this Agreement are a standard form of agreement. **MSRC** will provide Resources for Oil Spill Events in U.S. Jurisdictional Waters to:

(i) other MPA Members or their affiliates only under this standard form of agreement. as it may be amended from time to time in accordance with Section 11.05(a). and

(ii) to non-MPA Members. other than the U.S. Government or a state government, only on applicable terms and conditions no more favorable to that non-MPA Member than this Agreement is to the **COMPANY**, when judging the terms and conditions and this Agreement. each as a whole as opposed to the relative merits of any particular provision.

12.06. Usage. In this Agreement. singular includes the plural and plural includes the singular; "President" means the President of the United States: "day" means a calendar day unless otherwise specified; references to articles, sections. exhibits. or schedules refer to the corresponding part of this Agreement unless otherwise specified;"state" includes any commonwealths, territories. possessions. districts. or other political subdivisions of the United States; references to a statute include all statutory provisions consolidating, amending. or replacing the statute referred to unless otherwise so stated; "including" means including without limitation and not as a limitation; and "writing" includes printing, typing, facsimile. lithography, and other means of reproducing words in a tangible visible form.

12.07. Definitions and Defined Terms. Capitalized terms used in this Agreement or in any of the Schedules, and not otherwise defined. have the meaning ascribed to them in Schedule 1.

12.08. COMPANY and Covered Entity Obligations and Rights.

12.08(a) Covered Entity Obligations. The **COMPANY**. as the Corporate Parent of the Covered Entity, unconditionally guarantees the performance of all obligations of the Covered Entity in accordance with this Agreement if the Covered Entity does not perform those obligations. If the Covered Entity does not elect to assume general management and overall direction and control of all Response Activities under this Agreement, the **COMPANY will** assume those functions. **MSRC** may enforce this guarantee without first pursuing any remedies for nonperformance against the Covered Entity. Performance by **MSRC** to a Covered Entity in accordance with this Agreement discharges **MSRC**'s obligations for performance of the same obligations to the **COMPANY**. Performance by a Covered Entity in accordance with this Agreement discharges the **COMPANY**'s obligations for performance of the same obligations to **MSRC**. The **COMPANY** is not entitled to any extension of time for performance or any other concession or rights in addition to those set forth in this Agreement with respect to the performance of the Covered Entity's obligations.

12.08(b) COMPANY Performance of Covered Entity Obligations. The **COMPANY** undertakes the applicable obligations of the Covered Entity under this Agreement if no Covered Entity is identified under Section 6.03 or no Covered Entity is

involved in the particular use of Resources.

12.08(c) Exercise of Rights. The **COMPANY**, at its election, may exercise any and all rights of the Covered Entity in this Agreement to the extent not already exercised in full by the Covered Entity. In the event of a conflict between the exercise of any rights under this Agreement by the **COMPANY** and the Covered Entity, the exercise by the **COMPANY** controls.

12.08(d) References, Employees and Contractors. If the **COMPANY** is required to perform any obligations or elects to exercise any rights of the Covered Entity, those particular rights and obligations and the corresponding references relating to the Covered Entity or its employees, contractors, facilities or vessels will apply and refer also to the **COMPANY** and its employees, contractors, facilities and vessels.

12.08(e) No Rights to Enforce. A Covered Entity may exercise the rights set forth in regard to the Covered Entity in this Agreement, including the right to assume general management and overall direction and control of all Response Activities under this Agreement, but does not have or obtain any rights to enforce directly by arbitration or legal or administrative proceedings any provisions of this Agreement, including any obligations of **MSRC** under this Agreement. The **COMPANY** retains all rights to enforce this Agreement in accordance with its terms.

MSRC
Marine Spill Response Corporation®

Judith R. Norell
Marketing & Customer Service Manager
(703) 326-5617

August 26, 2005

Mr. Chris Maudlin
Olympic Pipe Line Company
2201 Lind Ave. SW, Suite 270
Renton, Washington 98055

Re: Letter of Intent

Dear Mr. Maudlin:

This letter certifies that BP America Inc. has entered into an Agreement with the Marine Spill Response Corporation (MSRC). Pursuant to this Agreement the Olympic Pipe Line Company and its accompanying facilities are (1) entitled by contract to MSRC response services, and (2) have the right to cite the capability of MSRC in its Facility Response Plan, in accordance with the terms and conditions of the Standard Form MSRC Service Agreement.

The enclosed Execution Instrument to the MSRC Service Agreement dated September 26, 2001 between BP America and MSRC is proof that such a contract exists. In addition, MSRC's contract is an evergreen contract and continues automatically until such time that BP America ceases to be a member of the Marine Preservation Association (MPA).

Please let me know if I may provide further assistance to you in the future.

Sincerely,

Judith R. Norell

Enclosure

MSRC
Marine Spill Response Corporation®

Don Toenshoff, Jr.
Executive Vice President

December 21, 2011

Mr. Robert Baldwin
BP Shipping
501 Westlake Park Blvd. Room 26.152A
Houston, TX 77079

Dear Mr. Baldwin:

The National Preparedness for Response Exercise Program (NPREP) Guidelines require a response plan holder to ensure that Equipment Deployment Exercise requirements are met on an annual basis. The NPREP Guidelines identify the minimum amount of equipment that must be deployed in Equipment Deployment Exercises.

This letter provides documentation to you that MSRC has completed the NPREP Equipment Deployment Exercise requirements for 2011. For purposes of Equipment Deployment Exercises under NPREP, each MSRC Region (including both the Atlantic and Gulf Areas for the Atlantic/Gulf Region) is considered a separate Oil Spill Removal Organization (OSRO). MSRC is divided into three Regions, Atlantic/Gulf (Maine – Texas, including the Mid-Continent, Puerto Rico and the U.S. Virgin Islands), California (self-explanatory) and Pacific/Northwest (Washington, Oregon and Hawaii). MSRC has deployed, at a minimum, the NPREP required amounts of each type of boom and one of each type of skimming system in the applicable regional inventory. This equipment has been deployed, if required, in each of the three types of operating environments listed in NPREP ("River & Canal", "Inland", and "Ocean"). Each of the three MSRC Regions (plus the Atlantic and Gulf Areas separately) has met these equipment deployment requirements in 2011. In addition, each Region has conducted extensive personnel training and has maintained its equipment according to a detailed preventative and corrective maintenance schedule.

MSRC has an aerial dispersant program, which is comprised of two contracted C-130 aircraft (based in Mesa, AZ and Kiln, MS) and four contracted King Air BE-90A aircraft (based in Concord, CA; Salisbury, MD; Kiln, MS; and San Juan, PR). MSRC's Dispersant Program, including all aircraft, are exercised through internal training and drills.

Documentation and records of the specific information relating to MSRC Equipment Deployment Exercises and Equipment Maintenance records are maintained in each MSRC Region. Additionally, highlights of when each MSRC Region satisfied the equipment deployment requirements are available on the MSRC website (www.msrc.org) in the Customer Access section.

Please feel free to contact the MSRC regions directly or me at (703) 326-5610 for additional information.

Sincerely,

220 Spring Street Suite 500 Herndon, VA 20170 Telephone 703 326 5600 Fax 703 326 5660

Judith A. Roos
Vice President
Marketing, Customer Services & Corporate Relations
(703) 326-5617

February 4, 2011

Re: Aerial Oil Tracking Resources

Dear Customer:

On February 22, 2011, the Aerial Oil Tracking requirements of 33 CFR Part 154.1035 (b)(3)(vii) for MTR Facility Response Plans (FRPs) and 33 CFR Part 155.1035(i)(11), 33 CFR Part 155.1040(j)(11), and 33 CFR Part 155.1050(l) for Vessel Response Plans (VRPs) go into effect.

For planning purposes under these regulations, the Aerial Oil Tracking resources must be capable of supporting all response operations, including: mechanical recovery, dispersant application, and in situ burning. The Marine Spill Response Corporation (MSRC) has developed the following capability in conjunction with this new regulatory requirement that our plan holder customers may cite in their response plans, along with their citation of MSRC as the resource provider:

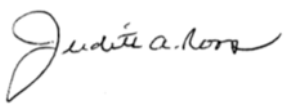
- Aerial surveillance aircraft;
- Along with the aircraft, the pilots and trained personnel to support oil spill response operations;
- For planning purposes, these resources are capable of arriving at the site of the discharge in advance of the arrival of response resources identified for Tiers 1, 2 and 3 planning timeframes; and
- Observation personnel trained in the protocols of oil spill reporting and assessment.

Observation personnel are primarily trained MSRC employees. The other resources are available through contracts or other approved means (specifically Letters of Intent ("LOIs") or other agreements with various aircraft providers. These services are subject to availability of aircraft and personnel. Multiple aircraft providers are listed for each geographic Captain of the Port ("COTP") Zone.

MSRC will maintain lists of the potentially available aircraft providers, along with other documentation, by COTP zones within the respective MSRC Regional Response Center. These records will be made available upon request. MSRC will periodically review this capability by COTP zone and update the documentation as appropriate.

MSRC has provided a copy of this letter to US Coast Guard Headquarters personnel responsible for VRP compliance and to COTPs within MSRC's Operations Area for their information. Customers may use this letter in their FRP or VRP as they deem appropriate.

Sincerely,



US Pipelines and Logistics

28100 Torch Parkway
Warrenville IL 60555

30 September 2010

Operations Managers

Appointment and Authorization of "Qualified Individuals"

Pursuant to the Federal Water Pollution Control Act, as amended by the Oil Pollution Act of 1990, and the regulations promulgated thereto with respect to required Response Plans, as may be applicable, you are each hereby appointed for and on behalf of the Company to serve as "Qualified Individual" for the particular assets / facilities of which you are manager. You are hereby expressly granted authority under the applicable Response Plan to:

(1) Activate and engage necessary oil spill removal organization(s);

(2) Act as liaison with the predesignated Federal On-Scene Coordinator (FOSC); and

(3) Obligate, either directly or through prearranged contracts, funds necessary to carry out all required or directed oil spill response activities.

As Operations Manager, you are also hereby authorized to further delegate these spill response authorities to those persons designated by you and listed in your area's / district's Emergency Response Plans as "Alternate Qualified Individual". Such delegation shall be documented and kept on file, in writing, by letter to each person so designated.

Steve Pankhurst

Steve Pankhurst - Business Unit Leader, US Pipelines & Logistics

(Note: original on file in the office of the Sr. Emergency Preparedness & Crisis Mgmt. Advisor)

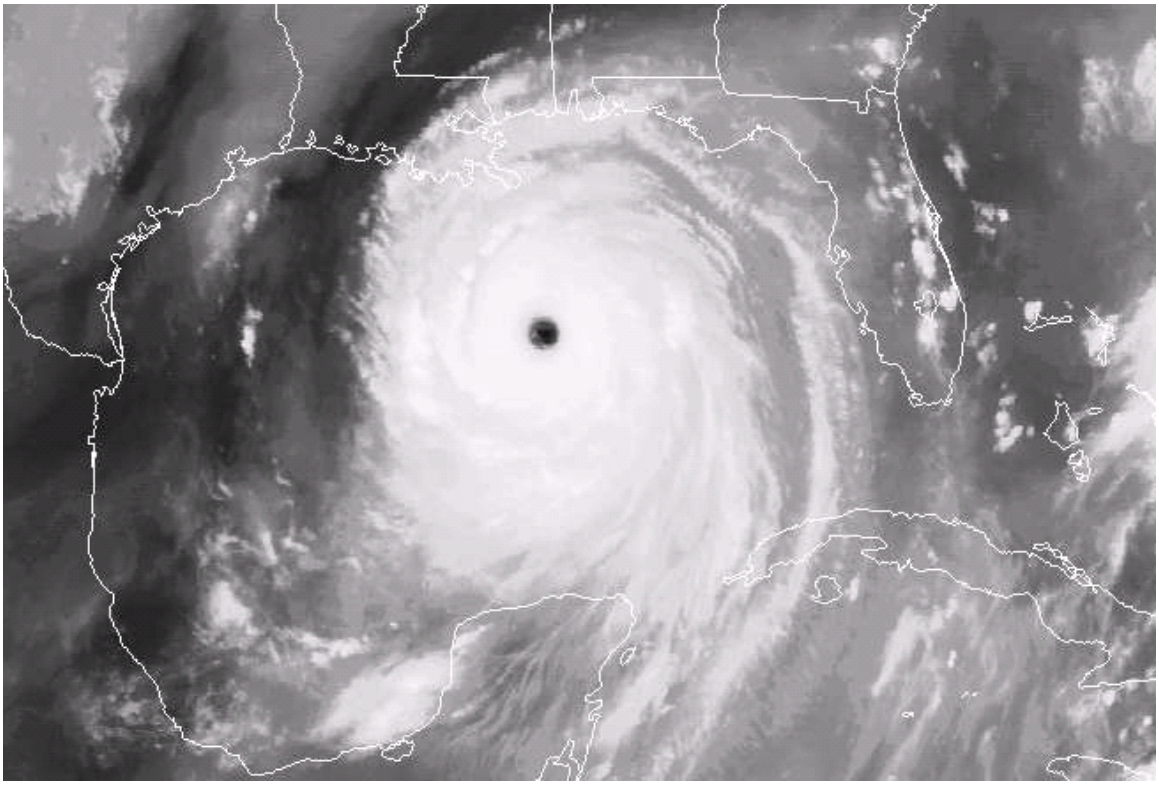
cc: Bobby Talley, Performance Unit Leader, East of Rockies
Kirsty Clode, Performance Unit Leader, Gulf of Mexico
Steve Maulding, interim Performance Unit Leader, West

US PIPELINES & LOGISTICS
EAST AREA

CARTERET TERMINAL

Roosevelt Avenue – Carteret, NJ 07008
Main: 732-541-5131 Fax: 732-541-9464

HURRICANE RECOVERY PLAN



Implemented: June 1, 2008

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EXECUTIVE SUMMARY

Hurricane season is from June 1st through November 30th. This document outlines the planning and recovery phases of the Hurricane/Disaster Plan. ***Safety is the primary objective***. However, protection of company assets and satisfying customer needs are integral to the plan.

This plan has been developed to include employees who have critical roles during the crisis and who have had actual hurricane experience. The plan is adaptable for use by other geographic locations since roles and duties are common within Terminals and not specific to the South Florida area.

PURPOSE

The purpose of this plan is to provide the Carteret Terminal Management Team with a consistent approach to handling Terminal facility outages associated with a variety of disasters; mainly Hurricanes.

The heart of the plan is a compilation of the individual duties of key personnel. Each person's duties are subdivided into pre and post hurricane responsibilities with checklists to ensure completion of required tasks. Pre hurricane actions consist of annual activities and hurricane countdown planning. Consistent with the National Weather Service terminology, countdown actions are identified after the naming of the hurricane, the declaration of a "**WATCH" (36 hours to landfall)** and the declaration of a **"WARNING" (24 hours to landfall).** During a hurricane, each person will have recommended procedures to guide the planning and response activities. Thereafter, further procedures for Post Hurricane activities are outlined in equal detail.

Note: *This is meant to be a dynamic document that should be reviewed and modified, as necessary, but at least annually.*

GENERAL INFORMATION ABOUT HURRICANES

A hurricane is a type of tropical cyclone, the general term for all circulating weather systems (counterclockwise in the Northern Hemisphere) over tropical waters with strong winds circulating around an extreme low-pressure area with wind speed that reaches or exceeds 74 mph.

Most hurricanes start in the tropical waters of the Atlantic Ocean, the Caribbean Sea, and the Gulf of Mexico. Although the official “hurricane season” runs from June 1 to November 30, most hurricanes strike in August, September and October.

Hurricanes are products of the Tropical Ocean and the atmosphere. Powered by heat from the sea, hurricanes are steered by the easterly trade winds and the temperate westerly’s as well as by their own ferocious energy. Around their core, winds grow with great velocity, generating violent seas. Moving ashore, hurricanes sweep the ocean inward, spawning tornadoes and producing torrential rains and floods.

Each year on average, 10 tropical storms (of which six become hurricanes) develop over the Atlantic Ocean, Caribbean Sea, or Gulf of Mexico. Many of these remain over the ocean. However, about five hurricanes strike the United States coastline every three years. Of these five, two will usually be major hurricanes (category 3 or greater on the Saffir-Simpson Hurricane Scale- See below).

The first precursor of an incoming hurricane is the pre-hurricane squall line. The line resembles a line of showers and thunderstorms along a mid latitude cold front. Gusty winds accompany the showers and thunderstorms. The line is usually 100 to 200 miles ahead of the eye, but can be as much as 500 miles ahead of the eye in very large hurricanes.

The next part of a hurricane that affects the area, are the outer convective bands. The typical hurricane has two or three of these bands (occasionally more in large hurricanes) which are comprised of cells resembling ordinary thunderstorms. These bands are in advance of the main rain shield. Wind gusts are higher in these bands than in the pre-hurricane squall line.

The rain shield is a solid or nearly solid area of rain that typically becomes heavier as the eye wall approaches. The wind, both sustained and peak gusts, keeps increasing as you move through the rain shield toward the storm's center or eye.

Another portion of the hurricane is the convective rings and bands. Also called spiral bands, when these pass through a location, the wind speed increases by as much as 50%, accompanied by a significant increase in the rainfall rate. When tornadoes and downbursts occur, they are likely to come from convective rings and bands.
Between convective bands, an area of stratiform rings and bands exist. Very light (if any) rain usually occurs while this area of the hurricane passes.
The eye wall will precede the hurricane's center. The eye wall is an organized band of convection that immediately surrounds the center. The fiercest winds and most intense rainfall typically occur near the eye wall.

Finally, the center of the hurricane or eye will pass over the area. The eye is usually a relatively calm center in the hurricane. The winds are light; the skies are partly cloudy or even clear and rain-free. The diameter of the eye can be as small as 5 miles or as large as 100 miles, averaging about 20 miles.

HURRICANE CATEGORY SCALE

All Hurricanes are dangerous, but some are more so than others. The way storm surge, wind and other factors combine determines the destructive power of a hurricane. To make comparisons easier and to make the predicted hazards of approaching hurricanes clearer to emergency forces, hurricane forecasters at the National Oceanic and Atmospheric Administration use a disaster-potential scale which assigns storms to five (5) categories. The Saffir-Simpson Scale can be used to give an estimate of the potential property damage and flooding expected along the coast as a result of hurricane activity.

Saffir-Simpson Hurricane Scale

Category One Hurricane

Winds of 74 - 95 mph
No real damage to building structures. Damage primarily to unanchored mobile homes, shrubbery, and trees. Also, some coastal road flooding and minor pier damage.

Category Two Hurricane

Winds of 96 - 110 mph
Some roofing material, door, and window damage to buildings. Considerable damage to vegetation, mobile homes, and piers. Coastal and low-lying escape routes flood 2-4 hours before arrival of center. Small craft in unprotected anchorages break moorings.

Category Three Hurricane

Winds of 111 - 130 mph
Some structural damage to small residences and utility buildings with a minor amount of curtain wall failures. Mobile homes are destroyed. Flooding near the coast destroys smaller structures with larger structures damaged by floating debris. Terrain continuously lower than 5 feet above sea level (ASL) may be flooded inland 8 miles or more.

Category Four Hurricane

Winds of 131 - 155 mph
More extensive curtain wall failures with some complete roof structure failure on small residences. Major erosion of beach. Major damage to lower floors of structures near the shore. Terrain that is continuously lower than 10 feet ASL may be flooded requiring massive evacuation of residential areas inland as far as 6 miles.

Category Five Hurricane

Winds in access of 155 mph
Complete roof failure on many residences and industrial buildings. Some complete building failures with small utility buildings blown over or away. Major damage to lower floors of all structures located less than 15 feet ASL and within 500 yards of the shoreline. Massive evacuation of residential areas on low ground within 5 to 10 miles of the shoreline may be required.

Source: U.S. Department of Commerce, NOAA, National Weather Service

WEATHER TERMS TO KNOW

Gale Warning
This warning may be issued when winds of 39-54 miles per hour (34-47 knots) are expected.

Storm Warning
This warning may be issued when winds of 55-73 miles per hour (48-63 knots) are expected. If a hurricane is expected to strike a coastal area, gale or storm warnings will not usually precede hurricane warnings.

Hurricane Watch
A Hurricane Watch is issued for a coastal area when there is a threat of hurricane conditions within 24-36 hours.

Hurricane Warning
A Hurricane Warning is issued when hurricane conditions are expected in a specified coastal area in 24 hours or less. Hurricane conditions include winds of 74 miles per hour (64 knots) and/or dangerously high tides and waves. Actions for protection of life and property should begin immediately when the warning is issued.

Flash Flood Watch
This means a flash flood is possible in the area; stay alert.

Flash Flood Warning
This means a flash flood is imminent; take immediate action.

Small Craft Advisory Statements
When a tropical cyclone threatens a coastal area, small craft operators are advised to remain in port or not to venture into the open sea.

Tornado Warning
Tornadoes spawned by hurricanes sometimes produce severe damage and casualties. If a tornado is reported in your area, a warning will be issued.

Tropical Disturbance
A moving area of thunderstorms in the Tropics that maintains its identity for 24 hours or more; a common phenomenon in the tropics.

Tropical Depression
An organized system of clouds and thunderstorms with a defined circulation and maximum sustained winds of 38 mph (33 knots) or less

Tropical Storm
An organized system of strong thunderstorms with a defined circulation and maximum sustained winds of 39 to 73 mph (34-63 knots)

Hurricane
An intense tropical weather system with a well-defined circulation and maximum sustained winds of 74 mph (64 knots) or higher. In the western Pacific, hurricanes are called "typhoons"; similar storms in the Indian Ocean are called "cyclones."

MAIN THREATS FROM A HURRICANE WHEN IT APPROACHES

Storm Surge

This is the greatest hurricane threat to life and property, and it can be devastating. Storm surge is a large dome of water often 50 to 100 miles wide that sweeps across the coastline near where a hurricane makes landfall. The stronger the hurricane and the shallower the offshore water, the higher the storm surge will be.

Storm Tide

The storm tide is the combination of the storm surge and the normal astronomical tide. For example, a normal tide of 2 feet added to a 12 foot storm surge results in a 14 foot storm tide. The "worst-case scenario" for an approaching hurricane is for the storm surge to arrive around high astronomical tide. This mound of water, topped by battering waves, moves ashore along an area of the coastline as much as 100 miles wide. The combination of storm surge, battering waves, and high winds can be devastating and deadly.

Winds and Squalls

A squall is a significant increase in the average or sustained wind speed which will usually be observed with a convective line of showers and thunderstorms. Hurricane force winds can destroy poorly constructed buildings and mobile homes. Debris, such as roofing material, traffic signs, aluminum siding, and small outdoor items can become flying missiles. Remember, a hurricane with winds of 150 mph has four times the energy of a hurricane with winds of 75 mph.

Heavy Rain and Flooding

Heavy rain and flooding is a threat to inland areas as well as coastal communities. Rainfall in excess of 6 inches is likely in many hurricanes, and can produce deadly and devastating floods.

Tornadoes

These tornadoes most often occur in thunderstorms embedded in rain bands well away from the center of the hurricane, but can also occur just outside the center of the hurricane.

UNITED STATES COAST GUARD (USCG) TERMS TO KNOW

U.S. Coast Guard Maritime Security (MARSEC) Levels

The Coast Guard has a three-tiered system of Maritime Security (**MARSEC**) levels consistent with the Department of Homeland Security's Homeland Security Advisory System (HSAS). **MARSEC** Levels are designed to provide a means to easily communicate pre-planned scalable responses to increased threat levels. The Commandant of the U.S. Coast Guard sets **MARSEC** levels commensurate with the HSAS. Because of the unique nature of the maritime industry, the HSAS threat conditions and **MARSEC** levels will align closely, though they will not directly correlate.

MARSEC levels are set to reflect the prevailing threat environment to the marine elements of the national transportation system, including ports, vessels, facilities, and critical assets and infrastructure located on or adjacent to waters subject to the jurisdiction of the U.S.

MARSEC Level 1

The level for which minimum appropriate security measures shall be maintained at all times. **MARSEC 1** generally applies when HSAS Threat Condition Green, Blue, or Yellow are set.

***New Normalcy*:** Facilities should be aware and vigilant of suspicious activities and possible threats. Facilities should employ the necessary measures to reduce the vulnerability and risk of their waterfront facility from a marine incident. This is the baseline level of security.

MARSEC Level 2

The level for which appropriate additional protective security measures shall be maintained for a period of time as a result of heightened risk of a transportation security incident. **MARSEC 2** generally corresponds to HSAS Threat Condition Orange.

***Heightened Rick*:** This security level is an enhanced security posture and will be the result of an increased risk either due to specific intelligence or increased vulnerability that heightens risk. Facilities can expect the need for additional personnel and material resources to reach this level. At this level, facilities will employ those additional measures identified in their Facility Security Plan (FSP) to reduce the vulnerability of and risk to their facility from an incident.

MARSEC Level 3

The level for which further specific protective security measures shall be maintained for a limited period of time when a transportation security incident is probable, imminent, or has occurred, although it may not be possible to identify the specific target. **MARSEC 3** generally corresponds to HSAS Threat Condition Red.

***Incident Imminent*:** This security level is a fully enhanced security posture and will be the result of a higher risk that a specific threat exists to the maritime domain or marine transportation system. At this level, facilities will employ the full measures identified in their Facility Security Plan (FSP).

USCG HURRICANE PORT READINESS CONDITIONS

The following clarifies USCG mandated Hurricane procedures and defines **Hurricane Port Conditions** for Ports of Miami, Miami River, Port Everglades, Port of Palm Beach, and Fort Pierce Indian River terminal and all terminal, facilities and waterways in Sector Miami's areas of responsibility.

Hurricane Port Readiness Condition Whiskey

- Sustained tropical storm force winds are predicted to arrive within 72 hours.
- Take due diligence to prepare for potential storm impacts.
- Ports and Waterfront facilities begin removing all debris and secure potential flying hazards.
- The COPT (Captain of the Port) will convene the Strategic Advisory Team (SWAT) via conference call.

Hurricane Port Readiness Condition X-Ray

- Sustained tropical storm force winds are predicted to arrive within 48 hours.
- All potential flying debris will be removed or secured.
- Hazardous materials/pollution hazards must be secured in a safe manner away from waterfront areas.
- All oceangoing commercial vessels greater that 500 gross tons must prepare to depart ports and anchorages. These vessels shall depart immediately upon the setting of Port Condition Yankee.
- Vessels that are unable to depart the port must contact the COTP to request and receive permission to remain in port. Proof of facility owner/operator approval is required.
- Vessels with COPT's permission to remain in port must implement their approved mooring arrangement.
- Terminal operators should prepare to terminate all cargo offloading operations.
- The COTP may require additional precautions to ensure the safety of the ports and waterways.
- Coast Guard Port Survey teams will be deployed to validate implementation of Port Condition X-Ray.

Hurricane Port Readiness Condition Yankee

- Sustained tropical storm force winds are predicted to arrive within 24 hours.
- The COTP will re-convene the SWAT via conference call.
- Affected ports are closed to inbound vessel traffic.
- Terminal operators must terminate all cargo operations not associated with storm preparations. Cargo operations associated with storm preparations include moving cargo within or off the port for securing purposes, crane and other port//facility equipment preparations, and similar activities, but do not include moving cargo onto the port or vessel loading/discharging operations unless specifically authorized by the COTP.
- All facilities shall continue to operate in accordance with their FSP (Facility Security Plan) and comply with the requirements of the Maritime transportation Security Act (MTSA).
- Oceangoing commercial vessels greater than 500 gross tons must depart the ports and anchorages unless prior permission to remain has been granted by the COTP.
- Anticipate drawbridges may be closed to vessel traffic as early as 8 hours prior to the arrival of tropical storm force winds.
- Coast Guard Port Survey team will conduct Port Condition Yankee validations.

Hurricane Port Readiness Condition Zulu

- Sustained tropical storm force winds are predicted to arrive within 12 hours.
- All port waterfront operations are suspended excepting final preparations as expressly permitted by the COTP necessary top ensure the safety of the ports and facilities.
- All vessels must have departed the ports and anchorages unless otherwise authorized by the COTP.
- Coast Guard Port Survey teams will conduct final port assessments.
- Ports will remain closed to waterfront activities until the passage of tropical storm force winds and the COTP, in conjunction with the SWAT, has determined that it is safe to reopen the ports based upon:
- +
- Ports and waterways damage surveys
- Checks of aids to navigation
- Status and condition of drawbridges
- Re-establishment of require port security measures in accordance with respective Facility Security Plans (FSP).

Post-Hurricane Conditions

- Affected ports will remain closed until the following conditions are met to the satisfaction of the COTP:
- Ports should begin to conduct damage assessments within the ports and movement within the port landside is authorized when deemed safe, provided appropriate security measures are in place in accordance with MTSA requirements. The Port Director or designated SWAT member must notify the COTP upon determination that the port is physically/structurally safe to recommence operations.
- Coast Guard Sector Miami teams will conduct preliminary assessments in the ports and waterways as soon as weather permit.
- Facilities may not receive cargo or passengers until the COTP specifically authorizes. At a minimum, the COTP must be advised by the Facility Security Officer (FSO) that the facility security plans are fully implemented and CBP is prepared to process cargo/passengers, as applicable, and Coast Guard port Survey teams have verified that security measures are in place.
- Bridge operation will remain coordinated through respective EOCs until the COTP determines that resumption of bridge operations is safe.
- Safety zones established around the ports during the event will remain in effect until rescinded by the COTP. No vessel movement or port operations will be authorized without the express permission of the COTP. Anticipate the potential for draft and further restrictions based upon the assessment of waterway and aids to navigation surveys.
- Additional post-hurricane information will be distributed by the COTP via MSIBs and direct contact with affected SWAT members.

Should there be any questions regarding these conditions, contact should be made directly with the Coast Guard Sector New York Command Center at 718-354-4120.

Carteret Terminal Contacts Internal Contact List (PLBU)

Emergency Volunteers in RED Ink.

EMERGENCY: DIAL 911

BP Notification Center (spills > 1 bbl)
630-961-6200 or 800-321-8642
BPNC Team Leader, Jeff Barnick (630-420-4357 or 630-542-2205)
Major Spills > 100 bbls – *call within 1 hour*
Non-Major Spills 1-100 bbls – *call within 8 hours*

Regional Operations Manager: **Rory Zagarella**
(Work) 770-457-2507 X 222
(b) (6)
(Mobile) 678-699-3805

District Operations Manager: **Timothy Hayes**
(Work) 732-541-5131
(b) (6)
(Mobile) 609-751-3275

Terminal Manager: **David Aparisio**
(Work) 732-541-4787
(b) (6)
(Mobile) 914-490-7204

Operations Supervisor: **Bob Blejwas**
(Work) 732-541- 5131
(b) (6)
(Mobile) 732-522-2601

Operations Supervisor: **Rich Bonet**
(Work) 732-541-5131
(b) (6)
(Mobile) 917-578-7418

Operations Supervisor: **Fred DiCapua**
(Work) 732-541-5131
(b) (6)
(Mobile) 732-522-9589

Operations Supervisor: **Bill Reuter**
(Work) 732-541-5131
(b) (6)
(Mobile) 732-372-2986

Fleet Manager: **Mickey Hamilton**
(Work) 732-541-5131
(b) (6)
(Mobile) 404-569-8473

Product Movement Scheduler: **Scott Chan**
(Work) 732-541-5131
(b) (6)
(Mobile) 917-375-7775

Product Movement: **Mohamed Ahmed**
(Work) 732-541-5131
(b) (6)
(Mobile) 908-906-0582

SAP Coordinator: **Diane Early-McEllen**
(Work) 732-541-5131
(b) (6)

Administrative Assistant: **Sharon Dingle**
(Work) 732-541-5131
(b) (6)
(Mobile) 732-841-4935

EP & CM Advisor: **Ron Bozarth**
(Work) 630-836-6245
(Mobil) 630-386-5105

HSSE Safety: **Alexis Vitone**
(Work) 732-541-5131
(b) (6)
(Mobile) 973-270-4567

Transport Safety Advisor: **Mario Monteagudo**
(Work) 678-583-9942
(Mobile) 678-300-0452

Government & Public Affairs: Gary Shute
(Work) 410-771-0917
(Mobile) 410-916-0763

HSSE Environmental: **Robert Tworkowski**
(Work) 410-636-6416
(Mobile) 240-461-0750

David Aparisio 5/30/08

Carteret Terminal Contacts Internal
Terminal Operators List

Terminal Operator: John Luminoso
(b) (6)
(Mobile)

Terminal Operator: Michael Brucato
(b) (6)
(Mobile)

Terminal Operator: Ric Flores
(b) (6)
(Mobile)

Terminal Operator: Anthony Williams
(b) (6)
(Mobile)

Terminal Operator: Thomas Tomy
(b) (6)
(Mobile)

Terminal Operator: Wayne Sroka
(b) (6)
(Mobile)

Terminal Operator: Richard Delligatti
(b) (6)
(Mobile)

Terminal Operator: Charles McGee
(b) (6)
(Mobile)

Terminal Operator: James Viering
(b) (6)
(Mobile)

Terminal Operator: Timothy Jicha(
(Mobile))

Terminal Operator: Edmund Carter
(b) (6)
(Mobile)

Terminal Operator: Michael Petrick
(b) (6)
(Mobile)

Carteret Terminal Contacts Internal Fleet Drivers List

Transport Driver: Michael Khazen
(b) (6)
(Mobile) 732-766-1537

Transport Driver: Ed Dzienowski
(b) (6)
(Mobile) 732-407-0680

Transport Driver: Aleksey Kozlakov
(b) (6)
(Mobile) 718-309-5182

Transport Driver: Domingo Delmonte
(b) (6)
(Mobile) 732-718-4526

Transport Driver:
(Home)
(Mobile)

Transport Driver:
(Home)
(Mobile)

Transport Driver:
(Home)
(Mobile)

Transport Driver:
(Home)
(Mobile)

Transport Driver:
(Home)
(Mobile)

Transport Driver:
(Home)
(Mobile)

Transport Driver:
(Home)
(Mobile)

Transport Driver: Joe Scialabba
(b) (6)
(Mobile) 917-837-8276

Transport Driver: John Venezio
(b) (6)
(Mobile) 732-874-2423

Transport Driver: Slowamir Markowski
(b) (7)(F)
(Mobile) 908-494-5964

Transport Driver:
(Home)
(Mobile)

Transport Driver:
(Home)
(Mobile)

Transport Driver:
(Home)
(Mobile)

East Region Terminal Contacts
Emergency Volunteers in RED Ink.

Terminal Manager Birmingham, AL: Jack Small
(Work) 205-925-1824
(b) (6)
(Mobile) 205-438-2473

Terminal Operator Birmingham, AL: Jeremy Willis
(Work) 205-925-1824
(Home)
(Mobile)

Terminal Operator Birmingham, AL: Greg Jennings
(Work) 205-925-1824
(b) (6)
(Mobile) 205-438-1986

Ops Supervisor, Mobile, AL: E.C. "Butch" Tramel
(Work) 251-456-3131 x303
(b) (6)
(Mobile) 251-583-4738

Terminal Manager Mobile, AL: Robert Johnson
(Work) 251-456-3131 x301
(b) (6)
(Mobile) 251-583-1876

Terminal Manager Montgomery, AL: Dan Defee
(Work) 334-262-8460
(b) (6)
(Mobile) 334-309-4710

Terminal Operator Montgomery, AL: Jimmy Halstead
(Work) 334-262-8460
(b) (6)
(Mobile) 334-309-4729

Terminal Operator Montgomery, AL: Bobby Smith
(Work) 334-262-8460
(Home)
(Mobile)

Terminal Manager Jacksonville, FL: Donna King
(Work) 904-757-4650
(b) (6)
(Mobile) 904-710-8408

Terminal Operator Jacksonville, FL: Gary Ard
(Work) 904-757-4650
(Home)
(Mobile)

Terminal Operator Jacksonville, FL: Cory Daniel
(Work) 904-757-4650
(Home)
(Mobile)

Terminal Operator Jacksonville, FL: Bill Martyn
(Work) 904-757-4650
(Home)
(Mobile)

Terminal Manager Tampa, FL: Kevin Hess
(Work) 813-248-3191
(b) (6)
(Mobile) 813-376-8226

Terminal Operator Tampa, FL: Eric Laing
(Work) 813-248-3191
(b) (6)
(Mobile) 813-781-0320

Terminal Operator Tampa, FL: Eddie Moreno
(Work) 813-248-3191
(b) (6)
(Mobile)

Terminal Manager Bainbridge, GA: Lorne Allcock
(Work) 229-246-0955
(b) (6)
(Mobile) 229-416-7119

Terminal Operator Bainbridge, GA: Doug Bailey
(Work) 229-246-0955
(b) (6)
(Mobile) 229-416-7795

Terminal Manager Doraville, GA: Robert Lofton
(Work) 770-457-2507 x 224
(b) (6)
(Mobile) 678-362-2509

Terminal Operator Doraville, GA: Jeff Zatkoff
(Work) 770-457-2506 ext 221
(Home)
(Mobile)

Terminal Manager Curtis Bay, MD: Ray Wagner
(Work) 410-636-0522 x3
(b) (6)
(Mobile) 443-790-2199

Terminal Manager Collins, MS: Bobby Layton
(Work) 601-765-6878
(b) (6)
(Mobile) 601-517-8209

Terminal Operator Collins, MS: Bert Leggett
(Work) 601-765-6878
(b) (6)
(Mobile) 601-517-8455

Terminal Manager Charlotte, NC: Robert Lewis
(Work) 704-399-3371
(b) (6)
(Mobile) 704-807-1351

Terminal Operator Charlotte, NC: Robert K. Lewis
(Work) 704-399-3371
(b) (6)
(Mobile) 704-807-1351

Terminal Manager Selma, NC: Roger Lamberth
(Work) 919-965-3751 x11
(b) (6)
(Mobile) 919-427-6512

Terminal Operator Selma, NC: Mike Keel
(Work) 919-965-3751
(b) (6)
(Mobile) 919-524-5020

Terminal Operator Selma, NC: Michael House
(Work) 919-965-3751
(b) (6)
(Mobile)

Terminal Manager Greenburg, PA: Dan Lachman
(Work) 724-834-4061
(b) (6)
(Mobile) 724-787-1804

Terminal Manager Sweetwater, SC: Mike Hastings
(Work) 803-279-3630
(b) (6)
(Mobile) 706-833-9846

Terminal Operator Sweetwater, SC: John Mitchem
(Work) 803-279-3630
(b) (6)
(Mobile) 706-833-3154

Terminal Manager Knoxville, TN: Jack Holbert
(Work) 865-588-5792
(b) (6)
(Mobile) 865-679-1561

Terminal Operator Knoxville, TN: Larry R. Dyer
(Work) 865-588-5792
(b) (6)
(Mobile)

Terminal Operator Knoxville, TN: Raymond M Isaacs
(Work) 865-588-5792
(b) (6)
(Mobile) 865-301-1903

Terminal Manager Nashville, TN: Brenda Powell
(Work) 615-297-3521
(b) (6)
(Mobile) 615-973-4273

Terminal Operator Nashville, TN: William Moorman
(Work) 615-297-3521
(b) (6)
(Mobile)

Terminal Manager Roanoke, VA: Michael Bedwell
(Work) 540-947-2227
(b) (6)
(Mobile) 540-354-6366

Terminal Operator Roanoke, VA: Darin Pearson
(Work) 540-947-2227
(b) (6)
(Mobile)

Terminal Operator Roanoke, VA: Darren Sage
(Work) 540-947-2227
(b) (6)
(Mobile) 540-204-1884

Terminal Operator Roanoke, VA: Ben Caldwell
(Work) 540-947-2227
(b) (6)
(Mobile)

Terminal Manager Richmond, VA: Jim Hufsteadler
(Work) 804-232-2347
(b) (6)
(Mobile) 804-363-8825

Terminal Manager Fairfax, VA: Tom Horn
(Work) 703-503-3687
(b) (6)

Carteret Internal Contacts (USCR & East Coast Fuels BU)

East & GC Fuels Manager: Rob Day
(Work) 630 836 5306
(Mobile) 630 864 9410

Sales Manager – EC Fuels: Liza Clechenko
(Work) 630-836 3651
(Mobile) 630-400 3294

Dealer Operations Manager: Jeff Burrell
(Work) 732-667-7054
(Mobile) 215-694-8962

COCO Operations Director, USCR: Bob Hume
(Work) 630-388-4289
(Mobile) 630-605-1215

Franchise Transformation Mgr: Ken Langston
(Work) 954-384-8345
(Mobile) 770-833-9956

COCO Operations Manager: Heather Ward
(Work) 407-366-5076
(Mobile) 770-235-1747

Facilities & Engineering Manager: Joe O'Brien
(Work) 219-924-1310
(Mobile) 219-670-6003

Area Maintenance Manager: Joe DeAntonio
(b) (6)
(Mobile) 856-256-9033

COCO HSSE Compliance: Mark Okamoto
(Work) 732-743-0901
(Mobile) 732-743-0895

Health & Safety Advisor, USCR: Marsha Mezenski
(Work) 330-220-6676
(Mobil) 216-337-4462

Security Advisor, USCR: George Malekovic
(Work) 630-388-4326
(Mobile) 630-364-8178

NE Jobber Sales Mgr: Jeffrey Gibbs
(Work) (same as mobile)
(Mobile) 630-551-6124

NJ/PA/NY Jobber Sales Mgr: Adel Hreiz
(Work) 215-529-9518
(Mobile)

Regional Account Executive: Anne Hauck
(Work)
(Mobile) 908-763-0685

Regional Account Executive: Anthony Cyriac
(Work) 908-393-9586
(Mobile) 908-531-9002

National Scheduling Operations Mgr: Dave Adkins
(Work) 216-271-8071
(Mobile) 216-299-2050

Regional Scheduling Manager: Karen Shipman
(Work) 813-242-5816
(Mobile) 216-218-1599

Lead Scheduler, Carteret: Adam Varoli
(Work) 813-242-5819
(Mobile) 330-801-0670

NE Lead Scheduler: Steve Carlson
(Work) 813-242-5803
(Mobile) 813-927-4804

COCO & Dealer Pricing Manager: Paul Yorke
(Work) 630-836-5094
(Mobile) 630-404-7551

Pricing Analyst: Gricelda Martinez
(Work) 630-836-5742
(Mobile) 773-392-7662

Carteret External Contact List

Location: Carteret
Address: 760 Roosevelt Avenue
City / State / Zip: Carteret, New Jersey 07008
Phone: 732-541-5131

EMERGENCY: 911

New Jersey State Police
(Main) 973-578-8173

United States Coast Guard: USCG
(Main) 718-354-4120
(Local) 718-354-4120
(web) http://homeport.uscg.mil

Carteret – Fire/Ambulance/Police Hazmat
Emergency: 911
(Main) 732-541-4181

Middlesex County Main Line
(Work) 732-828-9100

US. Customs & Border Protection
(Main) 800-BE-ALERT (232-5378)

Carteret BP Security Booth
(Main) 732-541-7031

Carteret Corporate & Community Relations
(Main)

PSE&G (NJ Power and Light)
(Main) 800-436-7734
(Local)
(Web)

Allied Barton Security
866-703-7666

Terminal Manager

Responsibilities:

The primary responsibility of the Terminal Manager is to insure the security of the terminal personnel, the facility, (buildings & tanks) and trucks (with the assistance of the FLEET Manager), monitor and coordinate product receipts and inventories. The manager will verify all terminal employee phone numbers and all emergency preparedness information and also review the plan to allow employees to make arrangements for their families and homes.

CHECKLIST (annual):

- ☐ Update employee and emergency preparedness information.
- ☐ Review with contractors and terminal housekeeping rules during hurricane season (loose supplies, secured equipment).
- ☐ Maintenance checks of all buildings (shutters, etc.), Tank Farms (debris, equipment, etc.) and supplies (batteries, mobile communications). Generator & Trailer.
- ☐ Insure proper level of Diesel available for Generator & normal operations of Fleet.
- ☐ Check battery life & test back up cell phones & charging equipment

CHECKLIST (WATCH - 36 hours to landfall):

- ☐ Notify Management in Retail Operations to include both the USCR & Fuels BU.
- ☐ Monitor product inventory, Communicate to the DSST & IST.
- ☐ Walk terminal grounds and check that all is secure.
- ☐ Develop a contingency plan for trucks and employees based on the path of the hurricane.
- ☐ Monitor hourly and plot path of hurricane & participate in conference calls.
- ☐ Charge batteries of back up cell phones & test phones to insure properly working
- ☐

CHECKLIST (WARNING! - 24 hours to landfall):

- ☐ Key personnel meet to discuss and finalize evacuation plans, etc.
- ☐ Inform Scheduling Center & USCR personnel on time when trucks will be pulled off road and loading will cease.
- ☐ Insure FLEET Manager has dispatched all trucks to safe ground and keeps employee tracking roster updated.
- ☐ Secure tank farm (last check of all pipes, valves, & loading rack & VRU).
- ☐ Secure all buildings (shutters, computers, machines, phones, & important papers).
- ☐ Secure Generator & Trailer with tie down straps.
- ☐ Chain & lock entry gates
- ☐ Just prior to evacuation, shut-off all electrical power.
- ☐ Secure all entry door locks

POST HURRICANE

Terminal Manager

Responsibilities:

The primary responsibility of the Terminal Manger is to return to the terminal and assess damage as soon as possible. Evaluate and call parties necessary needed to help make terminal operational. The Terminal Manager will also verify terminal inventory.

CHECKLIST:

- ☐ Make contact with supervisor or next level available.
- ☐ Walk terminal lines and check for damage.
- ☐ Conduct initial safety / hazard assessment, prior to other personnel re-entering the facility.
    - o Released hazardous materials?
    - o Downed power lines?
    - o Submerged electrical equipment hazards?
    - o Obvious structural integrity issues with buildings, canopies, loading racks, docks, tanks, aboveground piping, stairs, catwalks, etc.?
    - o Wildlife hazards (e.g. snakes, varmints, etc.)?
- ☐ **Allow only key personnel to return to the facility, to begin recovery work. (Maintain up-to-date list). *Require communication to someone offsite on a regular basis***
- ☐ Contact USCG with any fence damage or building damage
- ☐ Insure any damage or repairs needed to terminal & assets are immediately addressed
- ☐ Check for electrical power – if not readily available, ready generator power
- ☐ If NEXTEL phones not functioning, distribute back up verizon cell phones to DOM, TM, FM, FS, and Operators for use until NEXTEL use restored.
- ☐ Contact DSST & IST
- ☐ Account for personnel & ascertain the home circumstances / needs of impacted personnel. (Note: ensure you have an up-to-date employee phone/address list)
- ☐ Contact the FLEET Manager to keep lines of communication open and insure readiness of FLEET when rack operational
- ☐ Oversee that terminal is brought back online and fully operational
- ☐ Insure proper SOP's are followed
- ☐ Contact the Scheduling Department to inform that terminal now operational
- ☐ Inform the management teams of Retail to include the USCR & Fuels BU.
- ☐ Participate in all post hurricane conference calls
- ☐ If distributed, gather back and store the back up cell phones & charging equipment.

Remember, our priorities are:

1. **Protection of People**
2. **Protection of the Environment**
3. **Protection of BP Assets**
4. **Resumption of Business**

PRE HURRICANE

Terminal Operator

Responsibilities:

The primary responsibility of the Terminal Operator is to secure the facility, (buildings, tanks and trucks), monitor and coordinate product receipts and inventories. The operator will be familiar with all emergency preparedness information.

CHECKLIST (annual):

- ☐ Update employee and emergency preparedness information.
- ☐ Review with contractors and terminal housekeeping rules during hurricane season (loose supplies, secured equipment).
- ☐ Maintenance checks of all buildings (shutters, etc.), Tank Farms (debris, equipment, etc.) and supplies (batteries, mobile communications).
- ☐ Insure proper level of Diesel available for Generator & normal operations of Fleet
- ☐ Insure we have proper security supplies: tie down straps, storm shutters for non-impact windows, zip-ties, visquene (plastic sheeting), keyed-a-like padlocks & chain

CHECKLIST (WATCH - 36 hours to landfall):

- ☐ Monitor product inventory, Communicate to the ERT.
- ☐ Monitor final incoming vessel activity with Port & IST
- ☐ Insure proper level of Diesel available for Generator & normal operations of Fleet
- ☐ Walk terminal grounds and check that all is secure.
- ☐ All small items in terminal are picked up and any objects that can be stored up in the warehouse (glycol drums, wood pallets and secure portable fall protection platform)
- ☐ Insure all 3rd party contractors & equipment operating on site have been evacuated
- ☐ Develop a contingency plan for trucks and employees based on the path of the hurricane.
- ☐ Monitor hourly and plot path of hurricane & participate in conference calls.
- ☐ Insure we have proper security supplies: tie down straps, storm shutters for non-impact windows, zip-ties, visquene (plastic sheeting), keyed-a-like padlocks & chain
- ☐ REMEMBER TO FOLLOW ALL SOPs TO THE LETTER.

CHECKLIST (WARNING! - 24 hours to landfall):

- ☐ Key personnel meet to discuss and finalize evacuation plans, etc.

- ☐ Assist in cease of loading operations upon stand down of Fleet operations
- ☐ Insure dispatch of all Fleet trucks to safe ground – 3rd party carriers included
- ☐ Final Walk - secure North & South Tank Farms (last check of all pipes, valves, & loading rack & VRU).
- ☐ Shutdown VRU & Isolate
- ☐ Secure loading arms with zip-ties to meter protection rails, remove the three scully cords and store in warehouse. Remove three trash cans and store in warehouse.
- ☐ Secure Vapor Hoses with zip-ties
- ☐ Secure Diesel Dispenser hoses
- ☐ Secure warning horns from North & South Tank Farms
- ☐ South Tank Farm – Power off facility in MCC (need 2 TO's – Horn Acknowledge)
- ☐ Secure all buildings (shutters, computers, machines, phones, & important papers).
- ☐ Secure rack Fire Extinguishers & 150lb Fire Extinguishers into warehouse garage
- ☐ Secure Forklift
- ☐ Secure dumpsters to building
- ☐ Secure Generator & Trailer with tie down straps.
- ☐ Close Tanks
- ☐ Run final Inventory Folio
- ☐ Computer system shut down process: Drain all bays, perform normal EOD (folio freeze and close) Do tape backup, when completed take tape with you off site. Shutdown TMS, select FILE from tool bar, select SHUTDOWN and power off both CPU's PC.
- ☐ Call IST (Jonathan Berman 630-836-6630) informing them of our condition.
- ☐ Call DSST (Randy Robinson 708-588-7208) informing them of our condition.
- ☐ Back up TMS computer files & computer work station files
- ☐ Place PCs & Electronic equipment 4ft minimum off floor onto stable post
- ☐ Cover all pc equipment, printers, etc with visquene (plastic)
- ☐ Disengage Automatic Gate Opener
- ☐ Chain & lock entry gates
- ☐ Just prior to evacuation, shut-off all electrical power.
- ☐ Secure entry door locks
- ☐ REMEMBER TO FOLLOW ALL SOPs TO THE LETTER.

POST HURRICANE

Terminal Operator

Responsibilities:

The primary responsibility of the Terminal Operator is to return to the terminal and assess damage as soon as possible. Evaluate and call necessary help to make terminal operational. The operator will also verify terminal inventory.

CHECKLIST:

- ☐ Make immediate contact with supervisor or next level available regardless of work schedule
- ☐ Adhere to current day's work schedule for physical reporting for duty
- ☐ Walk terminal lines and check for visible damage to tanks, pipes, valves, & VRU.
- ☐ Replace removed warning air horns to North & South Tank Farm stations
- ☐ Inspect loading rack for visible damage
- ☐ Inspect loading rack drains.
- ☐ Inspect safety systems (e.g. tank hi-level alarms, emergency shutdowns, Scully overfill protection, fire protection, hydrocarbon detectors, fall protection, etc.).
- ☐ Inspect tank farm secondary containment / dike walls and storm drains.
- ☐ Inspect oil-water separators (i.e. water / product levels, rope skimmers, aerators, etc.).
- ☐ Inspect water & water treatment systems (potable & non-potable)
- ☐ Inspect / test vapor control systems (e.g. Vapor Combustion Unit, Vapor Recovery Unit, Vapor Holding Tank, & Continuous Emissions Monitoring System).
- ☐ Inspect environmental monitoring systems (e.g. groundwater monitoring wells and recovery wells).
- ☐ Re-open valves to pumps, loading rack, receipt lines. (Bleed air from lines, if necessary.)
- ☐ Inspect Fleet truck driving path into facility from entry through rack and exit to insure safe and clear pathway
- ☐ Insure any damage or repairs needed to terminal & assets are immediately addressed
- ☐ Check for electrical power – if not readily available, ready generator power
- ☐ Inspect Communication lines (phones: hard line & cellular, and high-speed access)
- ☐ Inform supervisor, team and other personnel of any safety hazards – insure any hazards are properly reported, marked off or made inaccessible if necessary to safeguard personnel
- ☐ Call Terminal Security Guard Company – SMI (Alex Bocaranda: 1-305-406-2225)

CHECKLIST continued:

- ☐ Un-secure Loading Arms
- ☐ Un-secure Vapor Hoses
- ☐ Un-Secure Diesel Dispenser Hoses
- ☐ Re-position rack Fire Extinguishers &150lb Fire Extinguishers back to stations
- ☐ Unlock entry gates and insure automatically operational
- ☐ Remove plastic from pc & electronics – place back into prior work stations
- ☐ Assist in overseeing repairs to any damages assets
- ☐ Restart VRU
- ☐ Verify TMS online
- ☐ Oversee that North & South Tank Farms are brought back online & fully operational
- ☐ Remove Locks & Chains from Entry gates
- ☐ Re-engage Automatic Gate Opener (if not operational - posted security personnel)
- ☐ Contact supervisor (Terminal Manager) to inform terminal is operational ready
- ☐ Contact the USCR & Scheduling Department to inform that terminal now operational
- ☐ Call IST (Jonathan Berman 630-836-6630) informing them of our condition.
- ☐ Call DSST (Randy Robinson 708-588-7208) informing them of our condition.
- ☐ Participate in all post hurricane conference calls or facility level meetings
- ☐ Create a “punch-list” for any outstanding work or repairs needed and keep supervisor informed of progress until all repair work has been addressed and completed.
- ☐ REMEMBER TO FOLLOW ALL SOPs TO THE LETTER.

Remember, our priorities are:

1. **Protection of People**
2. **Protection of the Environment**
3. **Protection of BP Assets**
4. **Resumption of Business**

BP PRE HURRICANE

Fleet Manager

Responsibilities:

The primary responsibility of the Fleet Manager is to insure the security and safety of the fleet personnel and trucks with the assistance of the Terminal Manager. The Fleet Manager will verify all drivers phone numbers and all emergency preparedness information and also review the plan to allow employees to make arrangements for their families and homes.

CHECKLIST (annual):

- ☐ Update employee and emergency preparedness information.
- ☐ Check battery life & test back up cell phones & charging equipment

CHECKLIST (WATCH - 36 hours to landfall):

- ☐ Coordinate with dispatch to insure stations are not low in inventory
- ☐ Schedule available drivers until landfall and post landfall
- ☐ Develop a contingency plan for trucks and employees based on the path of the hurricane, in assistance with the terminal manager
- ☐ Monitor hourly and plot path of hurricane & participate in conference calls.
- ☐ Charge batteries of back up cell phones & test phones to insure properly working

CHECKLIST (WARNING! - 24 hours to landfall):

- ☐ Key personnel meet to discuss and finalize evacuation plans, etc.
- ☐ Inform Scheduling Center of when trucks will be pulled off road and loading will cease. (Usually when winds in excess of 35MPH.)
- ☐ Insure all safety features in trucks are operating correctly, such as tire pressure & windshield wipers. and an
- ☐ Verify employee tracking roster updated.
- ☐ Assist Terminal Manager in securing all buildings (shutters, computers, machines, phones, & important papers).
- ☐ Insure all trucks have returned safely to terminal or other off site parking area.
- ☐ Insure all drivers have returned and are accounted for safely.
- ☐ Strategically park trucks & trailers in Terminal to protect against damage to assets and equipment.
- ☐ Assist Terminal Manager in securing Generator & Trailer with tie down straps.
- ☐ Assist Terminal Manager in chaining & locking entry gates
- ☐ Assist Terminal Manager prior to evacuation, shut-off all electrical power.
- ☐ Assist Terminal Manager in securing all entry door locks

POST HURRICANE

Fleet Manager

Responsibilities:

The primary responsibility of the Fleet Manger is to return to the terminal and assess damage as soon as possible. Inspect transport equipment, drive pathways and loading equipment. Insure safety of personnel. Evaluate and call parties necessary needed to help make fleet operational.

CHECKLIST:

- ☐ Make contact with supervisor or next level available.
- ☐ Assist Terminal Manager with conducting initial safety / hazard assessment, prior to other personnel re-entering the facility.
    - o Released hazardous materials?
    - o Downed power lines?
    - o Submerged electrical equipment hazards?
    - o Obvious structural integrity issues with buildings, canopies, loading racks, docks, tanks, aboveground piping, stairs, catwalks, etc.?
    - o Wildlife hazards (e.g. snakes, varmints, etc.)?
- ☐ **Allow only key personnel to return to the facility, to begin recovery work. (Maintain up-to-date list). *Require communication to someone offsite on a regular basis***
- ☐ Assist Terminal Manager in checking for electrical power – if not readily available, ready generator power
- ☐ Account for personnel & ascertain the home circumstances / needs of impacted personnel. (Note: ensure you have an up-to-date employee phone/address list)
- ☐ Contact the TERMINAL Manager to keep lines of communication open
- ☐ Assist Terminal Manager with insuring that terminal is brought back online and fully operational
- ☐ Inspect all trucks & trailers to insure no damage and that they can be operated safely.
- ☐ Contact the Scheduling Department to inform that terminal now operational
- ☐ Begin loading procedures of trucks with assistance from the Scheduling center's Allocation Instructions.
- ☐ Contract for additional 3rd party carriers if needed to replace damaged equipment.
- ☐ Monitor every route with drivers to insure safe passage to each delivery site.
- ☐ Contact Scheduling Center for updates to facility conditions post storm.
- ☐ Insure proper SOP's are followed
- ☐ Participate in all post hurricane conference calls

Remember, our priorities are:

1. **Protection of People**
2. **Protection of the Environment**
3. **Protection of BP Assets**
4. **Resumption of Business**

Disaster Recovery Prioritized Start Up

ELECTRICAL POWER	Once determined that FPL Port power is restored; * main breaker @ primary electrical panel to be turned on BP facilities * power will then be restored to buildings & MCC's
WATER SUPPLY	All water supply is pressurized Public Works
FIRE PROTECTION SYSTEM	BP automated system (rack & manual tank directed) is contingent upon power & water supply
NATURAL GAS	N/A
VRU	Working knowledge of PT EV carbon adsorption vapor recovery unit is necessary for start up.
TAS	Instructions in TAS C QRG….or call DSST @ 708-588-7200 * power up MIRROR (back-up) * "do you want to start mirror now?" answer NO * power up PRIMARY * "do you want to start TMS now?" answer YES * when operating screen appears, address MIRROR * select option B - start mirror
TERMINAL MECHANICAL	Prior to truck loading * VRU must be operational * fire system must be operational * load arms to be unsecured * tank discharge valve for each product to be loaded must be opened * sequential MTR switch in MCC to each opened tank to be "auto position" * scully reset @ west end of rack 1
SECURITY SYSTEM	Allied Barton Security…contact mark.sweat@alliedbarton.com ….732-272-1414
COMMUNICATION SYSTEM	Nextel phones for all managers, land lines for office. Should NEXTEL fail, we have back-up Verizon cell phones. Terminal manager will distribute. Should we lose power, we have back up land line phones that do not require electricity. Kinder Morgan Inc: Security and Dockside: 732-541-5161
DOCK / MARINE	NO MARINE RECEIPTS W/O Qualified terminal personnel For reporting an incident involving a marine vessel at a BP facility - in an emergency call the Naperville Notification Center - 630-961-6200 or 800-321-8642 - There is always a BP Shipping IMT leader on call. The Notification Center will track down one of the BP Shipping IMT Leaders. In non emergency situations, log into BP intranet and email: G BPS Terminal Feedback USA This distribution list contains all the USA based Marine and Port Assurance Superintendents. GPSTerminalFeedbackUSA@bp.com

CARTERET TERMINAL ONSITE EMERGENCY EQUIPMENT LIST

Electrical Main Box Information:

Spencer Electric and Ferrara Electric: 732-247-9794 and 646-208-3072 will supervise shutdown and restoration of Power.

Generator Information:

N/A as yet

Generator Trailer:

N/A as yet

Generator Truck:

N/A as yet

Company Pick-Up Trucks: *Located in the main parking lot.*

Ford F-150
License Plate#
Vin #

Ford Ranger
License Plate:
Vin #

VHF Marine Radios: *located in the Terminal Operators Room and Supervisors Office*

Make: Motorola
Model:

Back up Land Line Phones: *located in the Terminal Manager's office in the locked cabinet marked "Disaster Recovery".*
Corded, non-electrical AT&T standard Land Line Phones (

Back Up Nextel Phones: *located in the Terminal Mgr's Office in the locked cabinet marked "Disaster Recovery".*

These phones will be utilized in the event Verizon cell phone operations fail to work.

Hurricane Emergency Meeting Locations for Terminal Personnel

In the event that a hurricane hits us in New Jersey the following locations have been identified as emergency meeting locations if entry to the terminal is unavailable or unsafe.

1st Alternative: Burger King located in the Roosevelt Avenue Shopping Mall across the street from the terminal. Exit 12 New Jersey Turnpike

2nd Alternative: Holiday Inn Hotel – 100 Roosevelt Avenue, Carteret, New Jersey 07008 located at Exit 12 New Jersey Turnpike.

Local Command Centers:

If there is a hurricane which closes the Carteret Terminal for any extended time, the Management Team will work from home and the command centers identified below until it is safe to come back to the terminal. If there are any major fires or spills or significant damage which would temporally closes the terminal and surrounding areas , the Management staff will operate from one or more of the alternative meeting locations in order of availability.

Everyone may use the Command Centers as your email/phone/battery charger hub. For those of you with email/phone connectivity: please inform your colleagues that this is an alternate option for them, to get connected and updated.

Hurricane Emergency Meeting Locations for USCR & Fuels BU Personnel

In the event that a hurricane hits the New Jersey market the following sites have been identified as emergency meeting locations.

Local Command Centers: Radisson Hotel
30 Minue Street
Carteret NJ 07008
Phone: 732-541-2005

Holiday Inn
100 Roosevelt Avenue
Carteret New Jersey 07008
Phone: 732-541-9500

Everyone may use the Command Centers as your email/phone/battery charger hub. For those of you with email/phone connectivity: please inform your colleagues that this is an alternate option for them, to get connected and updated.

Post-Emergency Employee Contact Status Form Instructions

Employee Name:

- Type in Employee's Full name & knick-name if so used.

Date Contacted:

- Type in The Date and Time Employee was contacted.
  MM/DD/YEAR & 12:00AM or 12:00PM

Was Home Damaged:

- YES or NO

Extent of Damage:

- **None** = *Home is in livable condition and current occupied or occupiable*.

- **Minor Damage** = *Missing shingles, trees, fence, etc, Minimal water damages due to missing shingles. Livable now or minimal work needed make livable.*

- **Severe Damage** = *Flood water intruded into house, majority loss of shingles to roof, major repairs needed to make livable.*

- **Major Damage** = *Major structural damage or severe flooding, possible rebuild or major restoration repairs needed to make house livable.*

Date Expected To Return Living In Home?

- Type in The Date Employee expects to return living in home MM/DD/YEAR

Date Expected to Return To Work FULLTIME?

- Type in the Date Employee expects to return working FULL TIME MM/DD/YEAR

Additional Comments or Issues.

- Type in any other comments or issues that can assist employee or management with employees individual situation, such as further notes on house damage, transportation needs if any, medical or medication needs, family situation or needs.

Post-Emergency Employee Contact Status Form

Employee Name	Date Contacted	Was Home Damaged?	Extent of Damage?	Date Expected To Return Living In Home?	Date Expected to Return To Work FULLTIME?	Additional Comments or Issue

Post-Emergency Employee Contact Status Form

Employee Name	Date Contacted	Was Home Damaged?	Extent of Damage?	Date Expected To Return Living In Home?	Date Expected To Return to Work FULLTIME?	Additional Comments or Issue

Post-Emergency Employee Contact Status Form

Employee Name	Date Contacted	Was Home Damaged?	Extent of Damage?	Date Expected To Return Living In Home?	Date Expected To Return to Work FULLTIME?	Additional Comments or Issue

Hurricane Protocols – Retail Operations

Purpose

The purpose of this document is to outline the agreed policies, protocols and procedures between Retail and Logistics during Hurricane or other major event. There are two basic levels of actions to be enacted:

Code Yellow: Prior to a storm or event when there are expected market disruptions, topping of sites is instituted ahead of the anticipated panic buying behavior in the market, to avoid extended run outs.

Code Red: After a storm or event, when the assessment is that more than 25% of the sites in a market are expected to experience product outages and allocation are at or below 100% for the channel, code red is instituted.

Requirements to Institute:

- The decision to institute Codes Yellow or Red is owned by Retail and is to be made by the Local Operations Manager / RSM (Regional Sales Manager) in consultation with key

stakeholders including the RSM (Regional Scheduling Center Manager) and the DCM for the impacted markets.

- Code Yellow must be called at a minimum of 8 shifts or 4 days prior to the expected storm or event in order to allow Logistics to secure sufficient resources to top of tanks in the market. In order to have potential resources on standby, Retail must initiate communication of a potential code yellow 7 days prior to the storm.

Days	-7		-6		-5		-4		-3		-2		-1		0		1		2		3		4		5		6		7	
Shift	-14	-13	-12	-11	-10	-9	-8	-7	-6	-5	-4	-3	-2	-1	0	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16
Codes	Storm identifed				Call code Yellow										Call code Red																
Phase			Pre-prep Phase				Top Off - Code Yellow				Panic Buying				Storm		Recovery - Code Yellow or Red												Normal		
Scheduling						Normal		Modified							Strom		Manual				Modifed					Normal					
Fleet- Outside Market	standby							travel	set-up		Local, Regional + Outs				Storm		Local, Regional + Outside						Extended Local & Regional					Base		

Notes:

1. Retail must call code yellow or red at the indicated dates in order to put the processes into effect with sufficient time to have the expected impact
2. Scheduling
   - Modified = Using Aspen + the COCO ABC List & the Dealer Priority List to Top off
   - Manual =Manual scheduling. For Code Yellow - based on run outs, priority lists, closed site lists. For Code Red - based on prioirty list, dealer allocation model, closed site list
   - Normal= Using Aspen + For Code Yellow - based on run outs, priority lists, closed site lists. For Code Red - based on prioirty list, dealer allocation model, closed site list
3. Fleet
   - Base Fleet = Full fleet based on truck resouce plans
   - Extended Local & Regional Resouces = Flexing of FL fleets to the market in need via elimination of long loads
   - Local, Regional + Outside = Fleets secured from other markets to come in and help during recovery

- Code Red is to be determined during or right after the storm depending on the severity of the storms impact.
- Codes Yellow or Red will only be instituted in response to written direction from Retail (who) to the logistics team via the G US Logistics National Scheduling ELT distribution + the other distributions noted below under communication. The note must identify the market which should be moved to code yellow or red.
- For code yellow, allocation volumes and basis period must be cleared by Commercial Ops (Lance) ahead of making the call. The time basis for the dealer allocation model should be determined and communicated by Retail. For code red, the dealer allocation model will be run on the same basis as supply allocation from Commercial Ops.
- Retail must issue communication to sites to advise them of the decision to go to code red or yellow. See detailed distribution in the communication protocols below.

Meeting and Communication Protocols:

- A Retail point of contact is to be designated by the Local Operations Manager. The role of the point of contact is to issue site communication, status communication, serve as a collection point for issues and host meetings. The point of contact can change depending on staff availability.
- A logistics point of contact is to be designated by the RSM (Regional Scheduling Manager).
- A meeting needs to be established every shift to discuss issues from the prior shift and agree items for the next shift. This meeting is to be hosted by the Retail point of contact.
- The Retail Point of contact is to issue a status communication after each meeting to the following distribution:
  - G US Logistics National Scheduling ELT & Bert Wick's
  - The AOM and DOM's in the impacted area
  - Local Retail Management
  - The Dealer & Retail sites if appropriate
  - Retail Leadership
  - Commercial Ops
  - Scheduling Off-shore
  - Elite – Eli Finister
  - Sales Managers

- Retail is responsible for communication and training the retail sites including COCO, Dealers and Franchises. For code yellow, the communication must advise sites that they will be getting topped off and that they need to accept the volume. Retail will develop process cards for code yellow. For code red, the communication is to include updated of the code red emergency process cards. The communications to the Retail sites must be completed ahead of the storm, as the codes are instituted and regular updated in alignment with management of the storm events.

Attach Process Cards from Retail

Fleet Resources

Top Off Phase

For Code Yellow only -Transport Operations will work to call on the Extended Local, Regional and US resources via the following priority:

- Full Base Fleet consisting of company and dedicated carrier trucks as per the agreed truck resource plan for the market utilizing all available drivers
- Additional local EU if available. Note: truck availability is dependent on market conditions. Currently, we only expect to be able to secure 1 additional truck. - Tom wants to take out
- Additional C&D if available. Note: truck availability is dependent on market conditions and is normally difficult to obtain prior to a storm. US Logistics will attempt to leverage our dedicated carrier relationships to secure as many resources as possible for each shift.
- Flex of Regional markets – elimination of long loads off impacted market by coverage from adjacent terminals when possible. Would backfill, as needed, with additional C&D in the other markets.
- Transport Operations expect to secure additional fleet resources from other markets. This is likely to be 6 volunteer BP drivers to drive 3 BP trucks spotted in the market.
- We do expect to use fleet resources less efficiently during this period. This includes using split loads to achieve more top offs and potential unproductive man hours.
- If a site refuses a top of, the driver will move out of the lot and contact scheduling for a load diversion. The refused loads will be reported to the incident management team.

Panic Buying Phase

- For Code Yellow only, During Panic Buying, the fleet resources will remain as extended local, Regional and US Resources.
- Drivers are to call the site prior to leaving the terminal in an effort to prepare the lot prior to arrival. Site is expected to secure the lot and call for local police assistance if necessary. Driver will proceed with the delivery even if there is not response at the site.
- Drivers will only proceed with dropping the load if they can safely enter and exit the lot.

Recovery Phase

- Drivers are to call the site prior to leaving the terminal to in an effort to prepare the lot prior to arrival. Site is expected to secure the lot and call for local police assistance if necessary. Driver will proceed with the delivery even if there is not response at the site. Drivers will not be contacting sites from the truck after leaving the terminal. Tom not sure about this.
- Drivers will only proceed with dropping the load if they can safely enter and exit the lot.

Prior to the storm/ event, BP may decide to provide emergency preparedness assistance to the drivers with board up help and emergency supplies in an effort to assure driver resource availability. After the storm, additional assistance may be provided depending on the situation,

hotel rooms may be paid for. The local Fleet manager is responsible for making the necessary arrangements to accommodate driver's ability to report to duty.

Scheduling and Site Prioritization

Top Off Phase

Code Yellow: Upon institution of code yellow, Retail is to provide the agreed prioritization list to be used of Topping off sites:

- The scheduling team will move into modified operation and more frequently monitor site inventories and site deliveries.
- An updated ABC list for COCO site prioritization with expected impacted locations identified.
- The time basis agreed by Retail and Commercial Op for Dealer allocation. Scheduling will run the dealer allocation model and allocate by the prioritization generated by the model.
- Franchises will be prioritized with the dealer channel.

Scheduling will generate the normal Aspen schedule and supplement it with the prioritization list to do additional top off loads. Scheduling is likely to run split or short loads to achieve top offs. Need clarity – are we only topping off regular?

As noted in the communications section above, Retail is responsible for communicating the code yellow protocols to the Dealer channel so that they expect a top off. Dealers who refuse top of loads will be tracked and noted in the update meetings.

Panic Buying

Once panic buying ensues, scheduling will prioritize based on:

- An updated ABC list for COCO site prioritization with expected impacted locations identified.
- The time basis agreed by Retail and Commercial Op for Dealer allocation. Scheduling will run the dealer allocation model and allocate by the prioritization generated by the model.

Additional site inventories will be required:

- For sites without Veeder Root equipment communication automatically to scheduling, the offshore agents will call to request inventory on a regular basis. The site can also call the offshore agents using the number below.
- For sites with Veeder Root equipment communication automatically to scheduling, Scheduling Offshore will ping the site, update inventories in Aspen and provided an updated inventory xls sheet to the scheduling desk.

888 bphelpu (888-274-3578).

When Prompted:

- Enter option #2

- Select your Scheduling Center
- Press # 0 for assistance (this gets them to a Wipro call agent)

Recovery

Code Red can be instituted prior to the start of the recovery Phase. If code red is not instituted, code yellow will remain in force. If Code Red is called:

- The ABC list will be used for scheduling COCO's. C sites which run out will not be refilled until written communicated is received from Retail. Depending on product and fleet resource availability, B sites may not be filled.
- Dealers and franchises will be prioritized based on the dealer allocation model. Dealer loads will be based on the priority generated by the allocation model.
- Logistics requires an open/closed site list for COCO, Dealer and Franchise channels. This list is to be provided by Retail and updated on a regular basis, ie several times a day and posted on share point in an agreed location: https://wss2.bp.com/CrisisManagement/USConvOps. Closed sites will be taken into account when preparing the schedule and will not be delivered until they are noted as open on the open/closed site list.
- Once scheduling has determined that is can supply the C sites, the scheduling (Regional Scheduling Manager or delegate) is to contact the Retail Operations Manager to give the sites sufficient notice to prepare for receipt of product.

Additional Scheduling Resources will be added as appropriate:

- Local Scheduling Center over time
- Assistance from scheduling resources at other centers
- Temporary contract help
- Offshore overtime

Site & Customer Programs

- Retail will provide all sites with code yellow and red emergency process cards.
- For code yellow, Retail will consider extending credit terms of for the days during Top Off mode.
- Retail will coordinate with the sites for call in of site open and closed status and maintain a current list at the following location: https://wss2.bp.com/CrisisManagement/USConvOps.
- The scheduling off shore call center will accept site inquires on load status. They will be able to give the site the current status of an order and if a load has been scheduled for them. If an order is not yet schedule, they can inform the site that there is no order currently on the schedule and invite the customer to make a later inquire or contact their RAE/ CAE/FC. To contact the call center, sites will use the same process the use under normal operations:

1- 888-bphelpu (1-888-274-3578).

When Prompted:

- Enter option #2
- Select your Scheduling Center
- Press # 0 for assistance (this gets them to a Wipro call agent)

- The same load information will be available via the IVR

Call the IVR at 1-888-bphelpu (1-888-274-3578)

When Prompted:

- Enter option #2 (Fuel Product Inquiries/Scheduling)
- Select your Scheduling Center
- Press #1 to continue

- Enter your customer #
- Enter your pin #
- Enter option #5 to hear upcoming loads

- For escalation of issues:

    - COCO's are to contact their CAE
    - Dealer are to contact their RAE

The RAE's & CAE's will have a list of the scheduled loads.

Contacting the Call Center /Scheduling center
As per the emergency process cards, "B" and "C" sites should NOT call the scheduling center to inquire about delivery status etc. However, "A" sites can call the CSC/scheduling center, when they are out of gas. If a load has been scheduled for them, the offshore team will be able to inform them of the estimated delivery time. When calling, the store managers should inform the scheduling center person that they are an "A" site.

Once things return to normal again….
Once US Logistics is in a place that "A" sites and "B" sites can be supplied without problems in a CODE RED market, the Scheduling Center needs to contact the Operations Manager, BEFORE re-starting deliveries to the "C" sites. We will NOT have adequate staffing at "C" sites in a CODE RED market, to deal with a sudden influx of customers, once the fuel truck shows up. Remember, we will be staffing only for running the convenience store. Therefore, the Operations Manager needs a heads-up from the Regional Scheduling Center manager or delegate before we start supplying "C" sites again, so adequate staffing levels can be arranged, before we re-open our gasoline sales.

APPENDIX

A) Carteret Terminal Location Diagram

B) Carteret Terminal Building Evacuation Route Diagram

C) Carteret Upper and Lower Plant Evacuation Diagram

D) Carteret Terminal Upper and Lower Plant Diagrams

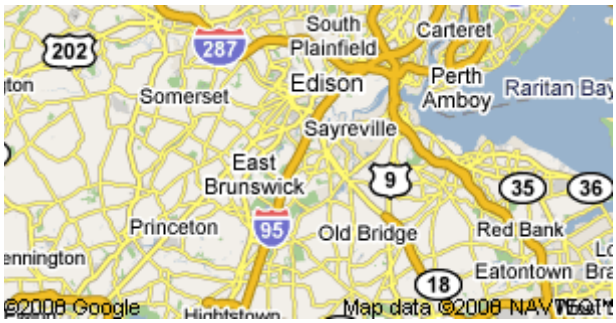
E) Carteret Fire Suppression Data

F) Carteret Terminal Electrical Shut-Off Information

G) Carteret Terminal Extinguishing System

H) Carteret Tanks Product Levels

I) Carteret Tank Level Chart to Avoid Floating & Shell Buckling



HAZARDOUS WASTE CONTINGENCY PLAN

The requirements for a hazardous waste contingency plan, as outlined in 40 CFR 265.52 indicate that "if the owner or operator has already prepared a SPCC Plan in accordance with 40 CFR 112, or some other emergency or contingency plan, he need only amend that plan to incorporate hazardous waste management provisions". As demonstrated in the table below, the terminal's existing OPA-90 Facility Response Plan (FRP) contains the items required for the hazardous waste contingency plan. The table outlines the required content of a contingency plan and the location within the FRP where the item is addressed. This FRP has been prepared to respond to a worst-case discharge of oil and can be readily applied to a release of hazardous waste from a wastewater treatment system or from hazardous waste that may be periodically generated elsewhere at the facility. Copies of the plans are maintained in the Terminal Technician's office or with other major HSSE documents/records.

http://www.trpcorp.com/bp_pipeline_new/electronic_plan/html_files/index_sort.asp

Hazardous Waste Contingency Plan Requirement	Location in Equivalent Emergency Plan	Regulatory Citation
Procedures to respond to fires, explosions, releases	Section 2 Initial Response Actions	40 CFR 265.52(a)
Arrangements with local Police, Fire, Hospitals	Section 4.6 Incident Management Team (IMT) Job Description Checklists	40 CFR 265.52(c)
Arrangements with contractors	Appendix B Contractor Response Equipment	40 CFR 265.52(c)
Primary emergency coordinator and alternate (name, phone)	Figure 3.1-3 Internal Notifications and Telephone Numbers	40 CFR 265.52(d)
List of emergency equipment	Section 7.1.1 Sustained Response Actions and Appendix B Contractor Response Equipment	40 CFR 265.52(e)
Location and description of the emergency equipment capabilities	Section 7.1.1 Sustained Response Actions and Appendix B Contractor Response Equipment	40 CFR 265.52(e)
Evacuation Plan, including primary and alternate routes and communication signals	Section 2 Initial Response Actions and Section 4.4 Incident Command System/Unified Command	40 CFR 265.52(f)

IMPLEMENTATION

The provisions of this contingency plan will be carried out immediately whenever there is a fire, explosion, or release of hazardous waste, which could threaten human health or the environment.

ARRANGEMENTS WITH LOCAL EMERGENCY AGENCIES

A letter has been sent to the following emergency response agencies outlining their response role in the event of fire, explosion, or release of hazardous waste. The letter provides a brief overview of the properties of hazardous waste potentially generated due to maintenance or ongoing terminal operations and properties of hazardous waste potentially generated in the event of a spill/release of hydrocarbons. Copies of these letters are contained in the Hazwoper Plan.

RESPONSE ROLES

Fire Department: Evaluate the situation and determine if evacuation is necessary and if assistance is needed. Determine proper course of action and coordinate efforts to contain and control the emergency.

Police Department: To assist the Fire Department and provide traffic control, if necessary during the emergency.

Hospital: To provide 24-hour emergency medical service.

Hazardous Waste Clean-up Contractors: To provide 24-hour emergency response crews who will provide containment, clean up, and disposal services of hazardous waste, as needed.

HAZARDOUS WASTE POTENTIALLY GENERATED ON-SITE

As part of its routine operations, terminal facilities may generate the following hazardous wastes: Oily water (from prover water draws, stormwater, etc), tank bottoms/sludges, saturated oily rags or absorbent spill pads, etc. It should be noted, however, that additional wastes may be generated non-routinely as the result of maintenance, including, but not limited to activities such as tank cleaning, tank sandblasting, painting, and contaminated soil excavation in the event of a release or spill of oil or capital construction. The following list of hazardous wastes and their characteristics are based upon those wastes which have historically been generated by terminal facilities:

Waste Stream Name	Potential Hazardous Characteristic
Tank bottoms, sludge, scale	Sometimes toxic for Benzene
Contaminated soil	Sometimes toxic for Benzene or Lead
Waste paint/thinners	Ignitable or Toxic for Lead
Spent sandblast media	Sometimes Toxic for Lead
Spent Solvents	Hazardous if Flammable.
Used Oil	Exempt if recycled
Batteries	Exempt if recycled
Oily Water	Exempt if recoverable product is sent for fuels blending. Otherwise, sometimes toxic for benzene or sometimes ignitable.
Oily rags, absorbent pads, plastic, PPE	Non-hazardous per Petroleum Debris Exclusion. If saturated, however, sometimes ignitable.

April 20, 2009

SAFETY ALERT

U.S. Department of Transportation
Pipeline and Hazardous Materials Safety Administration

Responding to Incidents Involving Ethanol and Gasoline Fuel Mixtures

The Pipeline and Hazardous Materials Safety Administration (PHMSA) is alerting emergency responders to appropriate emergency response guidance for responding to incidents involving fuel mixtures composed of ethanol (or "ethyl alcohol") and gasoline in various concentrations. The most common of these fuels, designated E85 (85% ethanol and 15% gasoline), recently has begun to be used in volume in the Midwest, primarily in the states of Illinois and Minnesota.

Fires involving E85 and other ethanol/gasoline mixtures containing more than 10% ethanol should be treated differently than traditional gasoline fires because these mixtures are polar/water-miscible flammable liquids (i.e., they mix readily with water) and will degrade the effectiveness of fire-fighting foam which is not alcohol-resistant. For this reason, PHMSA recommends use of alcohol-resistant foam to fight fires involving these fuel mixtures. Properties of ethanol/gasoline fuels that may be of interest to emergency responders are provided in the chart below.

Properties of Fuel Ethanol

Property	Comment
Vapor density	Ethanol vapor, like gasoline vapor, is denser than air and tends to settle in low areas. However, ethanol vapor disperses rapidly.
Solubility in water	Fuel ethanol will mix with water, but at high enough concentrations of water, the ethanol will separate from the gasoline.
Flame visibility	A fuel ethanol flame is less bright than a gasoline flame but is easily visible in daylight.
Specific gravity	Pure ethanol and ethanol blends are heavier than gasoline.
Conductivity	Ethanol and ethanol blends conduct electricity. Gasoline, by contrast, is an electrical insulator.
Toxicity	Ethanol is less toxic than gasoline or methanol. Carcinogenic compounds are not present in pure ethanol; however, because gasoline is used in the blend, E85 is considered to be potentially carcinogenic.
Flammability	At low temperature (32°), E85 vapor is more flammable than gasoline vapor. However at normal temperatures, E85 vapor is less flammable than gasoline, because of the higher autoignition temperature of E85.

FIGURE 3.4
PRODUCT SPECIFIC RESPONSE CONSIDERATIONS
FOR
ETHANOL SPILLS
FLASH PONT RANGE: Below 100 degrees F

Remember, without exception personnel safety is first priority. Exposure to vapor and liquid stages of the spilled product should be avoided.

Suggested physical response actions for these products are detailed below. It is important to note however, that each situation is unique and must be individually responded to. These procedures are considerations only. Actual circumstances may dictate that procedures followed may differ somewhat from those listed below. The following are intended for guideline purposes only.

These materials float on water and are extremely flammable. Containment of these materials may allow explosive concentrations to accumulate. The preferred response is to minimize impact to water and protect shorelines (storm sewers, creeks, rivers, etc.) from contamination, allow evaporation to occur, and contain/clean-up remaining product. Firefighting must be treated differently than gasoline fires because these product will readily mix with water and degrade the effectiveness of fire-fighting foam which is not alcohol resistant

Identify source and stop discharge if possible.

Make appropriate notifications to regulatory agencies and internal BP Management/Safety and Health Support. (Refer to Figure 2.5 for notifications.)

Obtain explosimeter and other air sampling measurements to assure that areas are safe to enter for continued response operations.

Eliminate sources of vapor ignition.

Stay upwind and evacuate nonessential personnel.

Advise people in the area of any potential threat and/or initiate evacuation. Inform local operators such as utilities, telephone company, railway, and tunnels as the situation demands.

Minimize area of surface soil impacted by free product (e.g. damming). Contact with surface runoff or standing water should be prevented whenever possible.

Recover pooled hydrocarbon as soon as possible.

Free hydrocarbons may be floated with water to aid recovery if increased vapors and agitation can be avoided. The water will act as a barrier to reduce further infiltration of pure hydrocarbon into the soil. (NOTE: This water will later have to be removed and probably treated.)
If free hydrocarbon **IS NOT** present, do not add water to the impacted area.

ETHANOL

SAFETY SPECIFIC CONSIDERATIONS FOR ETHANOL

FIREFIGHTING

REQUIRES ALCOHOL RESISTANT FOAM

COMMONLY REFERRED TO AS

"AR-AFFF"

(ALCOHOL RESISTANT AQUEOUS FILM FORMING FOAM)

MAY PRODUCE "INVISIBLE" FLAME

SMALL FIRES

EXTINGUISHING MEDIA:

DRY CHEMICAL

CO_2

WATER SPRAY

AR-AFFF

EMERGENCY OVERVIEW

CAUSES SEVERE EYE IRRITATION

CAUSES RESPIRATORY TRACT IRRITATION

MODERATE SKIN IRRITATION

PPE

Standard BP Terminal Level "D"
with
FRC

DO NOT ENTER 'HOT ZONE"

FIRST AID

IN ALL CASE SEEK MEDICAL AID

EYES: FLUSH CONTINUOUSLY

SKIN: FLUSH (SOAP & WATER)

INGESTION: DO NOT INDUCE VOMITING

2-4 CUPS OF MILK OR WATER