Mid-Continent Fractionation and Storage, LLC

CONWAY RESPONSE ZONE
SPILL RESPONSE PLAN (DOT/FRP)
PHMSA Sequence Number: 1551

Date:

March 2010 (Revision 6)

Originally Prepared by:
Technical Response Planning Corporation
8203 Willow Place South, Suite 160
Houston, Texas 77070
October 2001

Mid-Continent Fractionation and Storage, LLC

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Disclaimer Statement

Mid-Continent Fractionation and Storage, LLC (MCFS) owns, but no longer operates, the Conway 8" pipeline. Therefore the company no longer operates an oil pipeline that is subject to the Pipeline Oil Spill Response Plan requirement articulated in 49 CFR 194.

However, in response to a USDOT/PHMSA opinion (correspondence dated June 27, 2006), MCFS has developed this Pipeline Oil Spill Response Plan in accordance with 49 CFR 194.

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SECTION 1
INTRODUCTION

FIGURE 1-1 - RECORD OF CHANGES

Changes to this Plan will be documented on this page. Plan review and modifications will be initiated and coordinated by the Environmental Department in conjunction with the Supervisor/Area Manager.

CHANGE NUMBER	DATE OF CHANGE	DESCRIPTION OF CHANGE	PAGE NUMBER
1	10/2001	• Initial issue of plan	Entire Plan
2	4/2001	• Delete Emergency Procedures in Figure A.1-2	Page 4
3	8/2002	• Updated page number • Added ACPs Plan review. submittal letter • "Red Book" deleted • Updated Notifications • ICS revision • Response Strategies • Communications Plan • Updated contracts • Revised Three Final Rule calculations	TOC pgs. 2 and 3; Sec. 1 pgs. 2. 3, 8, 19, and 11; Sec. 2 pg. 2 and 3; Sec. 3 pgs. 15, 6, 8. and 9; Sec. 4 pgs. 2 and 5; Sec. 6 1 pgs. 4-5: Sec. 7 pgs. 1, 2, 4, and 5; App. B pgs. 2-4: App. D Pgs. 1, 7, and 11
4	8/2002	• Revised Distribution List • Revised Section 3 Figure 3.1-3	Intro pg. 3 Sec. 3 pg 7
5	9/2003	• Revised due to assets and company reorganization	TOC pgs 1-5, Sec. 1 pgs 1-9, Sec. 2 pgs 3, 3, 9 & 10, Sec 3. pgs 1, 2, 4, & 7-9, Sec 6 pgs 3 & 6, Sec. 7 pgs 2, 3 & 5, Appendix B - entire appendix, Appendix C - entire appendix, Appendix D - pgs 3, 4, 5 & 11
1	9/2005	• Revised due to assets and company reorganization	Plan reissued
2	7/2007	• Revised in response to USDOT/PHMSA opinion (correspondence dated June 27, 2006	Plan reissued as revision 2
3	10/2008	• Updated contact information and McPherson Uplands information	Revised pages to replace: Cover page; Sec. 1 pgs 2- 4, 10 and 11; Pages to insert after Sec.1 page 11: 10/6/2008 cover letter Revised pages to replace: Sec. 3 pgs 6-8; Appendix C, pg 4 and Figure 10
4	10/2009	• Updated to correct emergency response contractor	Revised pages to replace: Cover page; Sec. 1 pgs 2, 3, 5, & 8; Sec. 2 pgs 2-3; Sec. 3 pgs 3-5; Sec. 7 pg 2; App A pg 8 Pages to insert after Sec.1 page 11: 10/15/2008 letter; after App B pg3: Update Haz-Mat Response Information
5	11/2009	• Updated to revise RSPA to PHMSA at DOT request	All pages of text in document replaced; 2 electronic copies of Plan required to DOT
6	3/2010	• Updated contact information	All pages of text in document replaced; 2 electronic copies of Plan required to DOT

FIGURE 1-2 - DISTRIBUTION LIST

PLAN HOLDER	ADDRESS	NUMBER OF COPIES
Williams Midstream Gas & Liquids Inc. Tulsa Office	Environmental Specialist Williams Mid-Stream Gas & Liquids One Williams Center, WRC Tulsa, OK 74172	1
Williams Midstream Gas & Liquids Inc. Gas Control	P O Box 21899 WRC 3-9 Tulsa, OK 74172	1
Mid-Continent Fractionation and Storage, LLC Conway Area Manager	1372 7th Avenue McPherson, KS 67460	1
Department of Transportation - Pipeline and Hazardous Material Safety Administration	Environmental Planning Officer United States Department of Transportation Office of Pipeline Safety Room E22-210 1200 New Jersey Avenue, S.E. Washington, D.C. 20590	2 Electronic copies submitted

FIGURE 1-3 - CONWAY RESPONSE ZONE INFORMATION SUMMARY

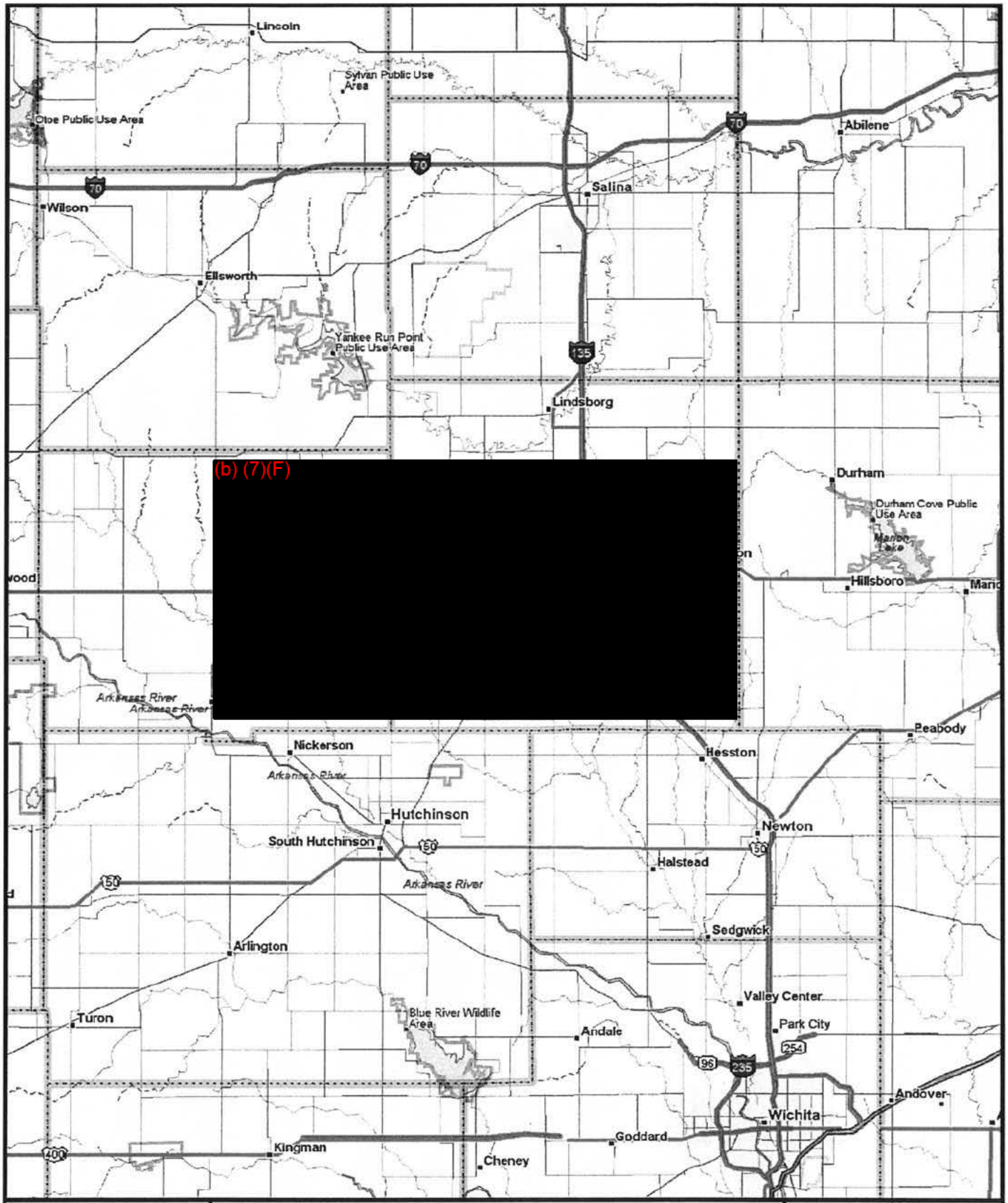
Owner/Operator:	Mid-Continent Fractionation and Storage, LLC P O Box 645 Tulsa, OK 74101-0645	
Facility Name:	Conway Area	
Facility Mailing Address:	1372 7th Avenue McPherson, KS 67460	
Facility Telephone/FAX:	(620) 843-2100 / (620) 834-7310	
Qualified Individuals (QI):	Randy Heinrichs Conway Area Manager (620) 834-2118 (Office) (b) (6) (620) 242-7597 (Mobile)	1372 7th Avenue McPherson, KS 67460
	Rob Burton Operations Supervisor (Frac & CW-M/UHS) 620-834-2172 (Office) (b) (6) 620-755-6282 (Mobile)	1372 7th Avenue McPherson, KS 67460
	Luc Staedtler Supervisor CUE/UHS (620) 834-2166 (Office) (620) 755-4927 (Mobile)	1372 7th Avenue McPherson, KS 67460
Description of Facility:	The facility consists of a NGL Fractionator, Underground storage at Conway West and Conway Underground East (CUE) and Truck and Railcar Unloading/loading Racks at CUE.	
Response Zone Consists of the Following Counties:	McPherson County, Kansas	
Line Sections/Products Handled: (Refer to Product Characteristic and Hazards, **FIGURE D.9-1**)	CUE 8 inch (operated by Enterprise)	NGL and Natural Gasoline
	Storage Field Piping	NGL and Natural Gasoline

FIGURE 1-3 - CONWAY RESPONSE ZONE INFORMATION SUMMARY CONTINUED

Alignment Maps (Piping, Plan Profiles):	Maintained at: • Facility • Tulsa Office
Spill Detection and Mitigation Procedures:	Refer to **SECTION 2** and **APPENDIX D**.
Statement of Significant and Substantial Harm:	The pipeline in this response zone is greater than 6-5/8 inches but less than ten miles long. Therefore, in accordance with 49 CFR 194.103 (c), the line section is not a significant and substantial harm facility.
Date Prepared:	October 2001 (as revised)

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' (QI) training and qualifications, refer to **SECTION 4.5** and **APPENDIX A.2** in this Plan.



P:\NRM\2007\4100704101\20_Cad\FIG1-4-GEN LOCrev05-07.dwg on Jul 16, 2007-2:49pm

BENHAM
infrastructure & environment

The Benham Companies, LLC
3700 W. Robinson, Suite 200
Norman, Oklahoma 73072
(405) 321-3895

www.benham.com

FIGURE TITLE
GENERAL FACILITY LOCATION

DOCUMENT TITLE
CONWAY RESPONSE ZONE
SPILL RESPONSE PLAN (DOT/FRP)

CLIENT
WILLIAMS MID-CONTINENT
FRACTIONATION AND STORAGE, LLC

LOCATION
CONWAY FACILITY
McPHERSON COUNTY, KANSAS

DATE	7/16/07
SCALE	NOT TO SCALE
DESIGNED BY	JC
APPROVED BY	LL
DRAWN BY	SKG
PROJECT NUMBER	4100704101
FIGURE NUMBER	1-4

(b) (7)(F)

1.1 PURPOSE/SCOPE OF PLAN

The purpose of this Spill Response Plan (Plan), commonly referred to as the Facility Response Plan (FRP), is to provide guidelines to quickly, safely, and effectively respond to a spill from the Conway Response Zone. The pipeline owned and operated by Mid-Continent Fractionation and Storage, LLC herein referred to as "Company". **Mid-Continent Fractionation and Storage, LLC (MCFS) owns, but no longer operates, the Conway 8" pipeline. Therefore the company no longer operates an oil pipeline that is subject to the Pipeline Oil Spill Response Plan requirement articulated in 49 CFR 194.**

However, in response to a USDOT/PHMSA opinion (correspondence dated June 27, 2006), MCFS has developed this Pipeline Oil Spill Response Plan in accordance with 49 CFR 194.

This Plan is intended to be used in conjunction with the "***Conway Area – McPherson County - Emergency Response Plan.***" Requirements of the ERP will supersede the FRP where conflicting elements are present. **Also, MCFS will follow System Integrity Plan (SIP) requirements as appropriate for response and documentation.**

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 the EPA Regional Integrated Contingency Plan Region 7 (ICP). Specifically, the Plan is intended to satisfy:

- U.S. Department of Transportation requirements for an OPA 90 Plan (in accordance with 49 CFR 194)

1.2 PLAN REVIEW AND UPDATE PROCEDURE

In accordance with 49 CFR Part 194.121 and 40 CFR 112.20, this Plan will be reviewed annually and modified to address new or different operating conditions or information included in the Plan. Upon review of the response plan for each five-year period, revisions will be submitted to PHMSA provided the changes to the current plan are needed, or a letter stating that the plan is still current. Company internal policy states that the Plan will be reviewed at least annually and modified as appropriate. In the event the Company experiences a Worst Case Discharge, the effectiveness of the plan will be evaluated and updated as necessary. If a new or different operating condition or information would substantially affect the implementation of the Plan, the Company will modify the Plan to address such a change and, within 30 days of making such a change, submit the change to PHMSA. Examples of changes in operating conditions that would cause a significant change to the Plan include:

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

All requests for changes must be made through the Plan Coordinator and will be submitted to PHMSA by the Environmental Department.

1.3 CERTIFICATION OF ADEQUATE RESOURCES

Certification is required by the operator of a DOT pipeline. MCFS does not operate the pipeline, but does operate storage field piping that DOT has deemed to be under their jurisdiction.

In accordance with 49 CFR 194, MCFS certifies that a contractual agreement is maintained with an Oil Spill Response Organization (OSRO) for providing the necessary private personnel and equipment to respond, to the maximum extent practicable, to a worst case discharge or substantial threat of a discharge.

Signed by: Randy Hewitt

Title: Area Manager

Date: 3/25/10

In accordance with the requirements of 49 CFR 194.119(e), this certification is to be signed by the QI or an appropriate corporate officer

1.4 AGENCY SUBMITTAL/APPROVAL LETTERS

DOT
(INSERT HERE)

Williams

Mid-Continent Fractionation
and Storage, LLC
P.O. Box 645
Tulsa, OK 74101-0645

March 26, 2010

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

Re: Mid-Continent Fractionation and Storage, LLC
Conway Response Zone, Spill Response Plan (DOT/FRP)
2010 Update / Revision 6 (March 2010)

Dear Ms. Barber:

Enclosed please find two electronic copies of Revision 6 of Pipeline Oil Spill Response Plan, for the Mid-Continent Fractionation and Storage, LLC ("MCFS") facilities located near Conway, KS. This plan has been prepared in accordance with the requirements of 49 CFR 194 and (at your direction) no paper version is being submitted to the "all electronic Oil Pollution Act of 1990 Program."

Please contact Cathy Orban at 918/573-1535 if you have any questions, or need additional information. Thank you for your assistance.

Sincerely,
Mid-Continent Fractionation and Storage, LLC

Randy Heinrichs
Area Manger, Conway

Enclosures

cc: Rob Burton – Conway, KS
Luc Staedtler – Conway, KS
Joe McCartney – Conway, KS
Cathy Orban – Tulsa, OK

Orban, Cathy

rom: Orban, Cathy
Sent: Thursday, December 10, 2009 2:36 PM
To: 'melanie.barber@dot.gov'
Cc: Heinrichs, Randy
Subject: PHMSA Sequence Number: 1551
Attachments: 11_2008FRP_Questionnaire.pdf

As you requested, the Facility Response Plan Questionnaire for the Mid-Continent Fractionation and Storage, LLC - Conway Response Zone Spill Response Plan (DOT/FRP; sequence number referenced above) is attached. Please call or email me at the number or email address shown below if you have any questions or need any additional information. Thanks, c

Catherine Orban
Environmental Specialist
Williams Mid-Stream Gas & Liquids
Environmental Department
One Williams Center
MD-WRC 2-C
Tulsa, OK 74172
Office: 918.573.1535
Cell: 918.630.5067
Fax: 918.573-6499
cathy.orban@williams.com

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

OPS Sequence Number: PHMSA Sequence Number 1551
Facility Response Plan Version Date: October 2009 – Revision 4
Pipeline Operator Name: Mid-Continent Fractionation and Storage, LLC – owner only
Contact Name: Cathy Orban, Williams Midstream
Contact Office, Fax, and Cellular Telephone Numbers: (all 918) 573.1535 (o); 573-6499 (f); 630.5067 (c)
Contact Mailing Address: One Williams Center, MD WRC-2C, Tulsa, OK 74172
Contact Electronic Mail Address: catherine.orban@williams.com
If different from the Contact Name, Facility Response Plan Author Name: Contactor to Mid-Continent Fractionation and Storage, LLC
Facility Response Plan Author Office, Fax, and Cellular Phone Numbers: NA
Facility Response Plan Author Mailing Address: NA
Facility Response Plan Author Electronic Mail Address: NA
Date of Review: November 2009

National Contingency Plan and Area Contingency Plan Certifications

For Sequence Number: PHMSA Sequence Number 1551

1.

A. Has the operator reviewed the National Contingency Plan (NCP) and each applicable Area Contingency Plan (ACP)?

The Environmental Protection Agency/*September 15, 1994*: National Oil and Hazardous Substances Pollution Contingency Plan; Final Rule. 59 FR 47384 and Environmental Protection Agency Region 7 Integrated Contingency Plan have been reviewed.

B. Does the Facility Response Plan follow the Area Contingency Plans?

The Environmental Protection Agency Region 7 Integrated Contingency Plan was followed in development of plan, where applicable.

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))

Mid-Continent Fractionation and Storage, LLC owns, but no longer operates, the Conway 8" pipeline. Therefore the company no longer operates an oil pipeline that is subject to the Pipeline Oil Spill Response Plan requirement articulated in 49 CFR 194.

However, in response to a United States Department of Transportation/Pipeline and Hazardous Materials Safety Administration opinion (correspondence dated June 27, 2006), Mid-Continent Fractionation and Storage, LLC has developed the Department of Transportation/Facility Response Plan in accordance with 49 CFR 194. The Plan is intended to satisfy the requirements of the Oil Pollution Act of 1990, and has been prepared in accordance with the National Oil and Hazardous Substances Pollution Contingency Plan and the Environmental Protection Agency Regional Integrated Contingency Plan Region 7.

Page Reference: Figure 1-3; Section 1/Page 4

Comment:

Recommendation:

Plan Information Summary
For Sequence Number: PHMSA Sequence Number 1551

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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)

- The Operator Name, Street Address, City, State, and Zip Code- This required information is provided in Figure 1.3 (Section 1, page 4).
  Mid-Continent Fractionation and Storage, LLC
  P O Box 645
  Tulsa, OK 74101-0645

- 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. – Not applicable, see comment below.

- 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. - Not applicable, see comment below.

- Description of each response zone, including the County(s) or Parish(es) and State(s) – McPherson County, Kansas is identified as the location.

- Explanation for each response zone designation – Not applicable, see comment below.

- 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 – Not applicable, see comment below.

- 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 - Not applicable, see comment below.

- List of line sections in each response zone by milepost, survey station number, or other operator designation – Not applicable, see comment below.

- If any response zone contains multiple pipeline systems, all pipeline systems are described and the oils they transport are listed - Not applicable, see comment below.

- The type of oil and the volume of the worst-case discharge in each response zone? - Not applicable, see comment below.

Page Reference: Section 1/Page 3-8; Figure 1-5; Section 3/Page6-8; Figure 3.1-3; App D.7, D.9

Comment: The pipeline identified for the facility is less than 10 miles in length; therefore, the facility is not a "significant and substantial harm" facility.

Recommendation:

Notifications

For Sequence Number: PHMSA Sequence Number 1551

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. The Supervisor/Area Manager (Qualified Individual), or designee, is responsible for initiation of immediate notification.

Randy Heinrichs is the Area Manager
randy.heinrichs@williams.com
(620) 834-2118 (Office)
(b) (6))
(620) 242-7597 (Mobile)
(620) 834-2387 (fax)

Midstream Gas Control and Facility Control Room phone numbers are listed below:

Midstream Gas Control	(800) 635-7400
Conway East Station	(620) 834-2111
Conway West Station	(620) 834-2138
Conway Fractionator	(620) 834-2171

Page Reference: Section 1, Fig 1-3/Page 5; Section 3.1/Page 6-8; Figure 3.1-3;

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 24-hour/day, 365 days/year. 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 Supervisor/Area Manager and Operations Control Center.
- The Supervisor/Area Manager (Qualified Individual) will assume the role as Incident Commander (Qualified Individual) and will conduct notifications as illustrated in the 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.

Page Reference: Section 3.1/Page 2-3, Fig 3.1-1; and
Section 4/Page 2-6, Fig 4.5-1 and Fig 4.5-2

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 plan includes 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.

- Qualified Individual(s)? - Supervisor/Area Manager (Randy Heinrichs), has been identified as the Qualified Individual.
- Oil Spill Removal Organization(s)? - Haz-Mat Response Inc. (Olathe, KS) has been identified as the Oil Spill Removal Organization.
- Are the National Response Center numbers correctly listed as 1-800-424-8802 and 202-267-2675 in the plan? - Yes, both the "800" and direct dial numbers for the National Response Center are listed in Figure 3.1-3.
- Company personnel?: Yes, contact numbers for company personnel including the Qualified Individual as well as other operations personnel and corporate support personnel are provided in Figure 3.1-3.

Page Reference: Section 3/Page 6, Fig 3.1-3;

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)) Yes, the questions specified below are included in the database used by the spill contractor when receiving spill reports.

- Name of pipeline operator? : yes
- Time of discharge? : yes
- Location of discharge? : yes
- Name of oil involved? : yes
- Reason for discharge? : yes
- Estimated volume of oil discharged? : yes
- Weather conditions on scene? : yes

Page Reference: Section 3/Page 4-5/ Figure 3.1-2 – note that form is obsolete and has been replaced by a database used by the spill reporting contractor; information/questions are similar and inclusive of the requirements.

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) – The facility has a Master Service Agreement with Haz-Mat Response, Inc. of Olatha/Wichita, KS.

- Name(s)? : Haz-Mat Response, Inc.
- Address(es)? : 1203C So. Parker, Olathe, KS 66061
  8225 Maple St., Wichita, KS 67209
- Telephone Number(s)? : 800-229-5252

Page Reference: Section 3/Page 7; Fig 3.1-3 provides name and phone number for Haz-Mat Response, Inc., Appendix B provides documentation of contract and organization capabilities.

Comment:

Recommendation:

Spill Detection and Mitigation Procedures

For Sequence Number: PHMSA Sequence Number 1551

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, Section 2 provides descriptions of Initial Response Actions and includes an Initial Response Action Checklist, Spill Detection and Mitigation Procedures, Spill Surveillance Guidelines, Spill Volume Estimating and Initial Containment Actions. Additional Spill Detection information is provided in Appendix D, Hazard Evaluation and Risk Analysis. Also, the facility's parent company (Williams) has implemented a System Integrity Plan for all subject assets and subsidiaries, which includes Emergency Management procedures for company assets including, as applicable, development of a Facility Response Plan.

Page Reference: Section 2/Page 2-10, Fig 2.1-1 Spill Mitigation; App. D.3/Page5; D.8; "System Integrity Plan"

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, Section 2, Section 3, and Appendix D identify personnel, equipment, and procedures for detecting leaks and spill and for locating spill throughout the response zone (i.e., the facility).

Page Reference: Section 2/page 2-10, Initial Response Actions; Section 3/Page 1-8; and App D.3 – Spill Detection

Comment:

Recommendation:

4.3 Does the Facility Response Plan name the maximum time to detect the spill and shut down flow in affected pipeline(s) in bad weather? (49 CFR 194.105(b)(1)) : Yes, the maximum shutdown response time for a worst-case discharge in adverse weather conditions is provided in Appendix D.

Page Reference: Appendix D.7

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 includes procedures to mitigate spills appropriate for the response zone(s) and consistent with applicable Area Contingency Plan(s).

Page Reference: App. D.3 – Spill Detection; Section 2/Page 5, Fig. 2.1-1, Spill Mitigation

Comment:

Recommendation:

Spill Containment

For Sequence Number: PHMSA Sequence Number 1551

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, initial containment actions are specified in Section 2 and response tactics for sensitive areas are outlined in Section 6; links to the Region 7 contingency plan and the National Oceanic and Atmospheric Administration reference for minimizing environmental impacts are provided.

Page Reference: Section 2.4/Page 10; Section 6.2/Page 2-6; Fig. 6.2-1

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, response contractor equipment list and response times are provided in Section 7. Haz-Mat Response has an estimated response time to the facility of one hour.

Page Reference: Section 7.1/ Page 2; Fig. 7.1-1

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, the contractor equipment list is provided in company provided documentation located in Appendix B and referenced/summarized in Section 7.

Page Reference: Section 7.1.3/Page 2; Fig. 7.1-1; Appendix B

Comment:

Recommendation:

Spill Recovery

For Sequence Number: PHMSA Sequence Number 1551

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, Section 2 provides Initial Response Actions including containment actions, spill management team activation procedures are outlined in Section 4.5, response equipment available through the Oil Spill Response Organization contractor are listed in Appendix B, and Section 6.2 lists information regarding spill containment and recovery.

Page Reference: Section 2/Page 2-10; Section 4.5/Page 3-6; Appendix B; Section 6.2/Page 2-3

Comment:

Recommendation:

6.2 Can planned spill recovery activities be accomplished within the appropriate tier times? (49 CFR 194.107(b)(2)(i) and(c)(1)(v), and 194.115): Yes, the Oil Spill Response Organization contractor is used to meet the Tier I, II, and III requirements and will provide the necessary labor and equipment to respond.

Page Reference: Sections 7.1 and 7.2 and Figure 7.1-1/Page 2; Appendix B

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): Details about the recovery equipment capacities are provided for the Oil Spill Response Organization contractor designated by the facility.

Page Reference: Appendix B

Comment:

Recommendation:

Disposal

For Sequence Number: PHMSA Sequence Number 1551

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 disposal plan outline is provided in Section 5.5 and waste management guidelines are provided in Section 7.3; needed equipment for waste management will be provided by the Oil Spill Response Organization contractor.

Page Reference: Section 5.5/Page 33; Section 7.3/Page 7, Appendix B

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, the Oil Spill Response Organization contractor is used to meet the Tier I, II, and III requirements and will provide the necessary labor and equipment to develop temporary storage areas and to provide waste management services.

Page Reference: Sections 7.1 and 7.2 and Figure 7.1-1/Page 2; Appendix B

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 Oil Spill Response Organization contractor will provide the necessary labor and equipment to develop temporary storage areas and to provide waste management services.

Page Reference: Section 6.2; Section 7.1.1, Appendix B

Comment:

Recommendation:

Sensitive Area Protection

For Sequence Number: PHMSA Sequence Number 1551

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, Section 6 identifies sensitive areas and provides strategies for protection of these areas, and these areas are identified on maps located in Appendix C.

Page Reference: Section 6/Page 2-7; Appendix C

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, the Oil Spill Response Organization contractor is used to meet the Tier I, II, and III requirements and will provide the necessary labor and equipment to provide needed services.

Page Reference: Section 7.1.1/Page 2; Section 6.3/Page 7

Comment:

Recommendation:

Response Management

For Sequence Number: PHMSA Sequence Number 1551

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 unified incident command system to be used for response is outlined in Section 4.4.

Page Reference: Section 4.4/Page 5-6

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)) : Yes, see details below.

- Qualified Individual? : Responsibilities for the qualified individual are described in Section 4.5/Figure 4.5-2 and Qualified Individual is identified in Figure 3.1.3.
- Other operator response personnel including the spill management team? : Responsibilities for Spill Management Team members are described in Section 4.5/Figure 4.5-2 and team members are identified in Figure 3.1.3.
- Contracted Oil Spill Removal Organization(s)? : The Oil Spill Response Organization information is provided in Appendix B; the Oil Spill Response Organization will be tasked with any needed responsibilities.

Page Reference: Section 3/Figure 3.1-3/Page 6-8; Section 4/Page 2-6; Appendix B

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)): Yes, the Emergency Notification Flow Chart provided in Figure 3.1-1 outlines the process flow with Oil Spill Response Organization, State and Local Responders, and the Federal On-Scene Coordinator while implementation of the Unified Command System is provided in Section 4.

- Oil Spill Removal Organization(s)? : The Oil Spill Response Organization will be used for all needed services.

- State and Local responders? : State and local responders will be organized as outlined in Section 4.

- Federal On-Scene Coordinator? : Federal responders will be organized as outlined in Section 4.

Page Reference: Section 3/Page 3; Section 4/Page 2-6

Comment:

Recommendation:

Communications, Response Equipment and Transportation

For Sequence Number: PHMSA Sequence Number 1551

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, emergency phone numbers are provided in Section 3, Section 4 provides activation procedures and Section 7 lists response resources including Oil Spill Response Organization information.

Page Reference: Fig. 3.1-3/Page 6; Section 4/Page 2-6; Section 7.1.1/Page

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)): The Oil Spill Response Organization will provide needed equipment and will maintain needed equipment.

Page Reference: Not Applicable: Section 7.1.1; Section 7.1.2

Comment: Operator relies on Oil Spill Response Organization equipment to respond

Recommendation:

10.3 **10.3** Does the Facility Response Plan describe procedures for maintaining response equipment the operator owns? (49 CFR 194.107(c)(1)(viii)): The Oil Spill Response Organization will provide needed equipment and will maintain needed equipment.

Page Reference: Not Applicable: Section 7.1.1; Section 7.1.2

Comment: Operator relies on Oil Spill Response Organization equipment to respond.

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)): Not applicable because the United States Coast Guard has classified the contract Oil Spill Response Organization.

Page Reference: Appendix B

Comment: Not Applicable – Oil Spill Response Organization is classified by United States 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)); NA

Page Reference: NA

Comment: Not Applicable – Oil Spill Response Organization is classified by United States Coast Guard.

Recommendation:

Does the Facility Response Plan identify location(s) for operator-owned and Oil Spill Removal Organization-owned response equipment? (49 CFR 194.115(b)): The Oil Spill Response Organization is identified in Section 7 and details regarding equipment and location are provided in Appendix B.

Page Reference: Section 7.1.1/Page 2 and Appendix B

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)): The Oil Spill Response Organization is used to meet Tier I, II, and III response planning requirements.

Page Reference: Section 7.1.1/Page 2 and Appendix B

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));
Mobilization times by the Oil Spill Response Organization are within 1 hour as specified in Section 7.

Page Reference: Section 7.1.1; Appendix B

Comment:

Recommendation:

Response Personnel and Mobilization

For Sequence Number: PHMSA Sequence Number 1551

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): The facility personnel are provided required training and the Oil Spill Response Organization is on standby to provide any additional trained personnel.

Page Reference: Section 1/Figure 1-3/Page 4; Section 3/Fig 3.1-3/Page 6-8; Appendix B;

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, Appendix B provides Contractor Response information, Appendix C identifies environmental sensitive areas, and Appendix D addresses hazard evaluation and risk analysis. Response activation procedures are provided in Section 4.

Page Reference: Appendices B, C, D; Fig D.2

Comment:

Recommendation:

Response Documentation and Worst Case Discharge

For Sequence Number: PHMSA Sequence Number 1551

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, Incident Planning procedures are specified in section 5; several checklists and forms (including Incident Command System forms) for documentation of decisions, activities, and costs are provided.

Page Reference: Section 5/Page 2-38

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, discharge scenarios, including the worst-case discharge scenario, and associated spill volume calculations are provided in Appendix D.

Page Reference: Appendices D.5.2, and D.7

Comment:

Recommendation:

12.3 Is the worst-case discharge volume calculated using the three specified methods in the DEnvironmental Protection Agencyrtment of Transportation regulation? Are the calculations accurate and as prescribed?
(49 CFR 194.105(b)): Yes, calculations are included for the Worst Case Discharge for the Department of Transportation "portion" of the pipeline and facilities, as defined in 49 CFR 194.105(b); i.e., for the largest volume (in barrels) 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 line 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.

These calculations appear to be accurate as prescribed.

Page Reference: Appendix D.7/Page 12-15

Comment:

Recommendation:

Training: Program and Procedures

For Sequence Number: PHMSA Sequence Number 1551

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

Page Reference: Appendix A.2

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)): Yes, the training program is described in Section A. Training elements include information regarding oil characteristics and hazards, exacerbating conditions (e.g., facility malfunctions or weather), control steps, and fire fighting procedures and Personal Protective Equipment.

- Oil characteristics and hazards? : See above

- Conditions that are likely to worsen emergencies, including the consequences of facility malfunctions or failures and appropriate corrective actions? : See above

- Steps necessary to control an accidental discharge of oil? : See above

- Steps necessary to minimize the potential for fire, explosion, or environmental damage? : See above

- Proper fire-fighting procedures and use of personal protective equipment? See above :

Page Reference: Appendix A/Page 7-10; Fig. A.2-2

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 training program is described in Section A. Training elements of the program are provide in Figure A.2-1; company specific or electronic data management systems may be used.

Page Reference: Appendix A.2/Page 7-10

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 training program is described in Section A. Company specific forms or electronic data management systems may be used.

Page Reference: Appendix A.2/Page 11

Comment:

Recommendation:

Spill Response Drill Program

For Sequence Number: PHMSA Sequence Number 1551

14.1 Does the Facility Response Plan describe procedures for conducting internal and external drills that include (49 CFR 194.107(c)(1)(ix)): Yes, exercise requirements and schedules are provided in Appendix A.

- Responsibility for planning, carrying out, and monitoring drills? : Figure A.1-2 specifies responsibility for planning, conducting, and monitoring drills.

- Announced drills? : Figure A.1-2 specifies details regarding tabletop, area and deployment drills; deployment drills are conducted by the Oil Spill Response Organization.

- At least one unannounced internal drill? : Figure A.1-2 specifies that the company will participate in unannounced tabletop drill if selected.

- Quarterly Qualified Individual notifications drills? : Figure A.1-2 specifies responsibility for conducted quarterly notification drills.

- Annual spill management team tabletop drills? : Figure A.1-2 specifies that annual spill management team tabletop drills may be held in conjunction with Mutual Aid Conway drills conducted annually.

- Annual Oil Spill Removal Organization(s) equipment deployment drills of representative types and amounts of key equipment in the Facility Response Plan? : Oil Spill Response Organization information is provided in Appendix B

- At least one drill that tests the entire response plan for each response zone at least once every three years? : Not applicable because the pipeline identified for the facility is less than 10 miles in length.

Page Reference: Appendix A, Figure A.1-2/Page 4 and Appendix B

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 three-year drill and exercise cycle and the frequencies for each type of drill in that cycle are specified in Appendix A.

Page Reference: Appendix A; Fig A.1-2/Page 2

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, Figure A.1-2 specifies that drill documentation will be maintained for 5 years.

Page Reference: Appendix A, Figure A.1-2/Page 4

Comment:

Recommendation:

Response Plan Maintenance

For Sequence Number: PHMSA Sequence Number 1551

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 plan review and update procedures are specified in Section 1; an annual review is required, a five-year review will be updated with the Pipeline and Hazardous Materials Safety Administration or a letter stating that no changes are needed will be provided, and conditions requiring revisions and submissions are specified.

Page Reference: Section 1.2/Page 9

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)): Yes, conditions requiring revisions and submissions are specified; also submittal within 30 days is required.

Page Reference: Section 1.2/Page 9

- New pipeline construction or purchase? : New pipeline construction or purchase would be a change in the Facility's configuration that materially alters the information included in the Plan.

- Different worst-case discharge volume? : A different worst-case discharge volume would be a change that would materially affect the implementation of the plan and is included in the list of changes that would require revision to the plan.

- Change in commodities transported? : A change in the type of oil handled, stored, or transferred that materially alters the required response resources is included in the list of changes that would require revision to the plan.

- Change in Oil Spill Removal Organization(s)? : A change in the name of the Oil Spill Removal Organization is included in the list of changes that would require revision to the plan.

- Change in Qualified Individual(s)? : A change in key personnel Qualified Individuals is included in the list of changes that would require revision to the plan

- Change in a National Contingency Plan or Area Contingency Plan that has a significant impact on the appropriateness of response equipment or response strategies?: A change in the National Contingency Plan or Area Contingency Plan that has significant impact on the equipment appropriate for response activities is included in the list of changes that would require revision to the plan.

- Change in response procedures? : Material change in the Facility's spill prevention and response equipment or emergency response procedures is included in the list of changes that would require revision to the plan.

Page Reference: Section 1.2/Page 9

Comment:

Recommendation:

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

- Post-drill evaluation results? : Drill program evaluation is outlined in Figure A.1-2.

- Post-incident evaluation results? : In the event the Company experiences a Worst Case Discharge, the effectiveness of the plan will be evaluated and updated as necessary.

Page Reference: Section 1.2/Page 9; Appendix A.1/Page 4

Comment:

Recommendation:

National Contingency Plan and Area Contingency Plan Consistency and Concept of Operations For Sequence Number:

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

Page Reference: Section 1.1/Page Section 6/page 4

Comment: The Plan was prepared in accordance with the National Oil and Hazardous Substances Pollution Contingency Plan (National Contingency Plan) and the Environmental Protection Agency Regional Integrated Contingency Plan Region 7 Integrated Contingency Plan.

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

Page Reference: Section 1.1/Page Section 6/page 4

Comment: The Plan was prepared in accordance with the National Oil and Hazardous Substances Pollution Contingency Plan and the Environmental Protection Agency Regional Integrated Contingency Plan Region 7.

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, Worst Case Discharge scenarios as defined in 49 CFR194 are outlined in Appendix D

Page Reference: Appendix D/Page 2-3 and Figure D.2

Comment:

Recommendation:

Orban, Cathy

rom: melanie.barber@dot.gov
Sent: Thursday, November 12, 2009 8:00 PM
To: Orban, Cathy
Subject: RE: PHMSA Sequence Number: 1551

The United States Department of Transportation Office of Pipeline Safety has received two electronic copies of the Williams Facility Response Plan, Sequence Number 1551.

Sincerely,

Melanie M. C. Barber
Environmental Planning Officer
United States Department of Transportation
Office of Pipeline Safety
Room E22-210
1200 New Jersey Avenue, S.E.
Washington, D.C. 20590
Office: 202-366-4560

From: Orban, Cathy [mailto:Cathy.Orban@Williams.com]
Sent: Monday, October 26, 2009 1:47 PM
To: Barber, Melanie (PHMSA)
Subject: RE: PHMSA Sequence Number: 1551

Thank you, two electronic copies will be submitted.

Catherine Orban
Office: 918.573.1535
Cell: 918.630.5067
cathy.orban@williams.com

From: melanie.barber@dot.gov [mailto:melanie.barber@dot.gov]
Sent: Monday, October 26, 2009 11:52 AM
To: Orban, Cathy
Cc: Heinrichs, Randy
Subject: Re: PHMSA Sequence Number: 1551

I lead an all electonic Oil Pollution Act of 1990 Program. Do not send paper Facility Response Plans. Do ship two electronic copies of ypur Facility Response Plan.

Sincerely,

Melanie M. C. Barber

From: Orban, Cathy <Cathy.Orban@Williams.com>
To: Barber, Melanie (PHMSA)

Cc: Heinrichs, Randy <Randy.Heinrichs@Williams.com>
Sent: Mon Oct 26 12:22:39 2009
Subject: RE: PHMSA Sequence Number: 1551

We will make the changes as you requested. Does your office need a hard copy version or will 2 electronic copies be adequate? Thank you, c

Catherine Orban
Office: 918.573.1535
Cell: 918.630.5067
cathy.orban@williams.com

From: melanie.barber@dot.gov [mailto:melanie.barber@dot.gov]
Sent: Monday, October 26, 2009 11:18 AM
To: Orban, Cathy
Cc: Heinrichs, Randy
Subject: PHMSA Sequence Number: 1551

The United States Department of Transportation Office of Pipeline Safety has received two electronic copies of the Williams Facility Response Plan, Sequence Number 1551. The package was addressed to our old Headquarters. The name of our agency was changed in Federal law to the Pipeline and Hazardous Material Safety Administration. Please replace all references in your Facility Response Plan to the Research and Special Programs Adminisitration with the Pipeline and Hazardous Material Safety Administration. Please complete the attached Facility Response Plan Questionnaire and return it to me by electronic mail by December 30, 2009. Answers should be in essay form and should not contain acronyms or terms of art.

Sincerely,

Melanie M. C. Barber
Environmental Planning Officer
United States Department of Transportation
Office of Pipeline Safety
Room E22-210
1200 New Jersey Avenue, S.E.
Washington, D.C. 20590
Office: 202-366-4560
Cell: 202-384-4043

From: Orban, Cathy [mailto:Cathy.Orban@Williams.com]
Sent: Monday, October 26, 2009 12:04 PM
To: Barber, Melanie (PHMSA)
Cc: Heinrichs, Randy
Subject: RSPA Sequence Number: 1551

The information you requested is below:

Facility Sequence Number: RSPA Sequence Number: 1551

nail Contacts

.ndy.heinrichs@williams.com

cathy.orban@williams.com

Catherine Orban

Environmental Specialist
Williams Mid-Stream Gas & Liquids
Environmental Department
One Williams Center
MD-WRC 2-C
Tulsa, OK 74172
Office: 918.573.1535
Cell: 918.630.5067
Fax: 918.573-6499
cathy.orban@williams.com

Mid-Continent Fractionation
and Storage, LLC
P.O. Box 645
Tulsa, OK 74101-0645

November 11, 2009

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

Re: Mid-Continent Fractionation and Storage, LLC
Conway Response Zone, Spill Response Plan (DOT/FRP)
2009 Update / Revision 5 (November 2009)

Dear Ms. Barber:

Enclosed please find two electronic copies of Revision 5 of Pipeline Oil Spill Response Plan, for the Mid-Continent Fractionation and Storage, LLC ("MCFS") facilities located near Conway, KS. This plan has been prepared in accordance with the requirements of 49 CFR 194 and (at your direction) no paper version is being submitted to the "all electronic Oil Pollution Act of 1990 Program."

Please contact Cathy Orban at 918/573-1535 if you have any questions, or need additional information. Thank you for your assistance.

Sincerely,
Mid-Continent Fractionation and Storage, LLC

Randy Heinrichs
Area Manger, Conway

Enclosures

cc: T.J. Rinke, Williams Midstream – Tulsa
Cathy Orban, Williams Midstream – Tulsa

Mid-Continent Fractionation
and Storage, LLC
P.O. Box 645
Tulsa, OK 74101-0645

October 15, 2009

Pipeline Response Plans Officer
Pipeline and Hazardous Material Safety Administration
Department of Transportation
400 Seventh Street, SW.
Washington, DC 20590-0001

Re: Mid-Continent Fractionation and Storage, LLC
Conway Response Zone, Spill Response Plan (DOT/FRP)
2009 Update / Revision 4 (October 2009)

Dear Sir or MS:

Enclosed please find revisions to two copies of revised pages for the Pipeline Oil Spill Response Plan, prepared in accordance with 49 CFR 194, for the Mid-Continent Fractionation and Storage, LLC ("MCFS") facilities located near Conway, KS. Please replace/insert the pages in these documents with the enclosed revised pages as directed on the attached change summary. Also enclosed are two CDs of the complete and updated DOT/FRP document.

Please contact Cathy Orban at 918/573-1535 if you have any questions, or need additional information. Thank you for your attention to this request.

Sincerely,
Mid-Continent Fractionation and Storage, LLC

Randy Heinrichs
Area Manger, Conway

Enclosures

cc: T.J. Rinke, Williams Midstream – Tulsa
Cathy Orban, Williams Midstream – Tulsa

Orban, Cathy

om: Orban, Cathy
Sent: Monday, October 26, 2009 12:47 PM
To: 'melanie.barber@dot.gov'
Subject: RE: PHMSA Sequence Number: 1551

Thank you, two electronic copies will be submitted.

Catherine Orban
Office: 918.573.1535
Cell: 918.630.5067
cathy.orban@williams.com

From: melanie.barber@dot.gov [mailto:melanie.barber@dot.gov]
Sent: Monday, October 26, 2009 11:52 AM
To: Orban, Cathy
Cc: Heinrichs, Randy
Subject: Re: PHMSA Sequence Number: 1551

I lead an all electonic Oil Pollution Act of 1990 Program. Do not send paper Facility Response Plans. Do ship two electronic copies of ypur Facility Response Plan.

Sincerely,

Melanie M. C. Barber

From: Orban, Cathy <Cathy.Orban@Williams.com>
To: Barber, Melanie (PHMSA)
Cc: Heinrichs, Randy <Randy.Heinrichs@Williams.com>
Sent: Mon Oct 26 12:22:39 2009
Subject: RE: PHMSA Sequence Number: 1551

We will make the changes as you requested. Does your office need a hard copy version or will 2 electronic copies be adequate? Thank you, c

Catherine Orban
Office: 918.573.1535
Cell: 918.630.5067
cathy.orban@williams.com

From: melanie.barber@dot.gov [mailto:melanie.barber@dot.gov]
Sent: Monday, October 26, 2009 11:18 AM
To: Orban, Cathy
Cc: Heinrichs, Randy
Subject: PHMSA Sequence Number: 1551

The United States Department of Transportation Office of Pipeline Safety has received two electronic copies of the Williams Facility Response Plan, Sequence Number 1551. The package was addressed to our old Headquarters. The name of our agency was changed in federal law to the Pipeline and Hazardous Material Safety Administration. Please replace all references in your Facility Response Plan to the Research and Special Programs Adminisitration with the Pipeline and Hazardous Material Safety Administration. Please

complete the attached Facility Response Plan Questionnaire and return it to me by electronic mail by December 30, 2009. Answers should be in essay form and should not contain acronyms or terms of art.

Sincerely,

Melanie M. C. Barber
Environmental Planning Officer
United States Department of Transportation
Office of Pipeline Safety
Room E22-210
1200 New Jersey Avenue, S.E.
Washington, D.C. 20590
Office: 202-366-4560
Cell: 202-384-4043

From: Orban, Cathy [mailto:Cathy.Orban@Williams.com]
Sent: Monday, October 26, 2009 12:04 PM
To: Barber, Melanie (PHMSA)
Cc: Heinrichs, Randy
Subject: RSPA Sequence Number: 1551

The information you requested is below:

Facility Sequence Number: RSPA Sequence Number: 1551
Email Contacts
randy.heinrichs@williams.com
cathy.orban@williams.com

Catherine Orban
Environmental Specialist
Williams Mid-Stream Gas & Liquids
Environmental Department
One Williams Center
MD-WRC 2-C
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Office: 918.573.1535
Cell: 918.630.5067
Fax: 918.573-6499
cathy.orban@williams.com

Mid-Continent Fractionation
and Storage, LLC
P.O. Box 645
Tulsa, OK 74101-0645

October 6, 2008

Pipeline Response Plans Officer
Pipeline and Hazardous Material Safety Administration
Department of Transportation
400 Seventh Street, SW.
Washington, DC 20590-0001

Re: Mid-Continent Fractionation and Storage, LLC
Conway Response Zone, Spill Response Plan (DOT/FRP)
2008 Update / Revision 3 (October 1, 2008)

Dear Sir or MS:

Enclosed please find revisions to two copies of revised pages for the Pipeline Oil Spill Response Plan, prepared in accordance with 49 CFR 194, for the Mid-Continent Fractionation and Storage, LLC ("MCFS") facilities located near Conway, KS. Please replace/insert the pages in these documents with the enclosed revised pages as directed on the attached change summary.

Please contact Cathy Orban at 918/573-1535 if you have any questions, or need additional information. Thank you for your attention to this request.

Sincerely,
Mid-Continent Fractionation and Storage, LLC

Randy Heinrichs
Area Manger, Conway

Enclosure

cc: T.J. Rinke, Williams Midstream – Tulsa
Cathy Orban, Williams Midstream - Tulsa

Mid-Continent Fractionation
and Storage, LLC
P.O. Box 645
Tulsa, OK 74101-0645

August 17, 2007

Pipeline Response Plans Officer
Pipeline and Hazardous Material Safety Administration
Department of Transportation
400 Seventh Street, SW.
Washington, DC 20590-0001

Re: Mid-Continent Fractionation and Storage, LLC
Conway Response Zone, Spill Response Plan (DOT/FRP)

Dear Sir or MS:

Enclosed please find two copies of the Pipeline Oil Spill Response Plan, prepared in accordance with 49 CFR 194, for the Mid-Continent Fractionation and Storage, LLC ("MCFS") facilities located near Conway, KS. MCFS has developed this plan in response to a USDOT/PHMSA opinion (DOT correspondence dated June 27, 2006) whereby the DOT has deemed the storage field piping to be subject to their jurisdiction. It should be noted that MCFS owns, but does not currently operate, the Conway 8" pipeline between the Conway West facility and the Conway Underground East facility and therefore this pipeline is not covered in this Plan.

MCFS requests that your office review and provide approval for the enclosed plan. Please contact Cathy Orban at 918/573-1535 if you have any questions, or need additional information. Thank you for your attention to this request.

Sincerely,
Mid-Continent Fractionation and Storage, LLC

Dave Keylor
Director, Gas Management & Control

Enclosure

cc: Carl Johnson, Williams Midstream - Conway Area
John Connelly, Williams Midstream – Tulsa
Cathy Orban, Williams Midstream - Tulsa

Copy Rob Hardsworth
Dave Kaylor

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

901 Locust Street, Suite 462
Kansas City, MO 64106-2641

Joe Prestley

CERTIFIED MAIL – RETURN RECEIPT REQUESTED

June 27, 2006

Mr. Robert Cronk, Jr.
Vice – President of Technical Services
Mid-Continent Fractionation & Storage, LLC
One Williams Center, Mail Drop WRC3-9
Tulsa, OK 74101

RECEIVED
JUN 30 2006

Re: PHMSA Jurisdiction Over Conway, KS facilities.

Dear Mr. Cronk:

Thank you for your response to our letter of Request for Specific Information dated February 15, 2006. We have reviewed your response and do not disagree that 40 CFR 68 and 29 CFR 1910.119 are well suited to protecting your employees and the public. However, we still believe that the facilities within the storage fields, up to the down hole portion of each well, are jurisdictional to PHMSA, and must be maintained to Part 195 standards, in addition to meeting OSHA standards of Process Safety Management.

Your response indicated that Mid-Continent's use of the Conway facilities is exactly described in §195.2 – Definitions, where "in-plant" piping is defined. However, the inspection of that facility found that the storage field is also utilized in the transportation of product. Product is taken from the pipeline and stored in the storage field where it is also re-injected into the pipeline for further transportation to another location. In other words, the storage facility is used much like an above-ground break-out tank facility where product is shipped to and from the storage via pipelines. Additionally, §195.2's definition of pipeline facility is "*new and existing pipe, rights-of-way, and any equipment, facility, or building used in the transportation of hazardous liquids or carbon dioxide.*" The storage field utilized at Conway meets this definition in that it is a facility used in the transportation of hazardous liquids.

We agree with your response regarding the boundaries of PHMSA jurisdiction with respect to pressure controlling devices for the pipeline being the demarcation mark for non-regulated plant facilities. However, in this case, the in-plant facilities are not used strictly for storage and transportation of product for processing. As noted before, these facilities are also utilized in storage and transportation of product by pipelines in a manner not related to processing

operations. Therefore, the pressure-control device application as a demarcation point would not necessarily apply to all piping at this facility.

A representative from this office will be in contact with your personnel to schedule an inspection of those storage facilities. If you have any questions or desire to discuss the issue further, please contact me at 816-329-3800.

Sincerely,

Ivan A. Huntoon
Director, Central Region
Pipeline and Hazardous Materials Safety Administration

RB V
OCT V
2006-00470

Williams

Mid-Continent Fractionation
and Storage, LLC
P.O. Box 645
Tulsa, OK 74101-0645

MARCH 31, 2006

SENT VIA CERTIFIED MAIL
RETURN RECEIPT REQUESTED

CLD entered ✓ jc
Docket entered
Scan: ✓ Yes ___ No
Pleadings Index:
___ Yes ✓ No

Ivan A. Huntoon
Director, Central Region
Pipeline and Hazardous Materials Safety Administration
901 Locust Street, Suite 462
Kansas City, MO 64106-2641

Re: Request for Specific Information Dated February 15, 2006
Subject: PHMSA Jurisdiction Over Conway, KS Facilities

Dear Mr. Huntoon:

This letter is in response to your above-referenced request for specific information related to Mid-Continent Fractionation and Storage, LLC's Conway, KS facility and its claim of exemption from DOT jurisdiction for purposes of 49 CFR 195. We appreciate the efforts to clarify and document the resolution of this issue. Mid-Continent believes the interests of employee, public, and environmental safety are best served by continuing to operate these facilities under EPA's RMP regulations and OSHA's PSM regulations, as they historically have been. We have found that the intense and thorough requirements of 40 CFR 68 and 29 CFR 1910.119, as written and enforced, are extremely well-suited to protecting our employees, the public and the environment at facilities like Conway. After researching the applicable regulations and statutory language concerning these facilities (although often ambiguous and, therefore, inconsistently interpreted), we believe their history, intent and subsequent interpretations and practice provide support for exempting the Conway facility piping at issue from PHMSA jurisdiction.

<u>In-Plant Piping</u>

The DOT regulations contain an exemption for "in-plant piping." 49 CFR § 195.1(b)(6). "In-plant piping," according to 49 CFR §195.2, means piping that is located on the grounds of a plant and used to transfer hazardous liquid or carbon dioxide between plant facilities or between plant facilities and a pipeline or other mode of transportation, not including any device and associated piping that are necessary to control pressure in the pipeline under § 195.406(b). Clearly, the intended application of this exclusion is to piping within the external boundaries of and subservient to the facility or between facilities. Essentially, this means piping necessary for internal movement, articulated in other words as piping "used for plant processes." 59 FR 35465 (1994). This is exactly the situation for Mid-Continent, where all the piping is used for plant processes and to support the operations at the plant.

Because the relationship to a regulated pipeline is important to the issue of jurisdiction over what might otherwise qualify as in-plant piping, pressure control helps distinguish between what should and what should not be regulated. "In plant piping," therefore, as regards a transfer from a gas liquid processing plant to DOT (PHMSA) regulated pipelines, ends "...at the inlet of each pressure control device on plant grounds that is necessary for the pipeline operator to control pressure in the pipeline outside the plant grounds." Since the pipes in question are located within the external boundaries of the plant, and because they don't serve to relieve pressure, they are exempt from PHMSA jurisdiction.

The Piping in Question is Already Regulated By Other Statutes

The piping at issue is currently regulated by other agencies and statutes. Specifically, OSHA Process Safety Management regulations ("PSM") and the Kansas Department of Health and Environment ("KDHE") regulations both cover the piping and, in fact, are well-suited to do so, resulting in protective, consistent, and effective standards.

OSHA's Process Safety Management regulations (29 CFR 1910.119) involve 14 different programs and provide details and guidance on compliance and inspection, specifically including mechanical integrity, personnel training, and the like. The result is safe, comprehensive guidance on important issues unique to facilities such as ours.

System Integrity Plan

For many years, Mid-Continent has treated the in-plant piping at the facilities in question as regulated by PSM. More recently, we have added the essentially similar RMP, an equally protective program designed to ensure the safety of the general public. The RMP/PSM programs are well established and have been successful in "preventing or minimizing the consequences of catastrophic releases..." (29CFR1910.119). The programs are also currently understood by all employees and have, in fact, been incorporated into our internal loss control program, the System Integrity Plan (SIP). The SIP is a comprehensive protocol for operations and contingencies and is familiar to our personnel across the country. It incorporates best management practices and is highly protective of human health and safety. Our SIP is consistent with what others in the industry are doing.

Industry Practice Supports Exclusion of Such Piping Systems from PHMSA Jurisdiction

For the reasons outlined above, industry practice has been to exclude caverns and associated in-plant piping from PHMSA regulation. There has, in fact, been reliance on this reasoning and, as such, underground hydrocarbon liquid storage facilities and associated piping have long been operated and maintained in accordance with OSHA Process Safety Management (PSM) requirements, which are protective of human health and safety. Indeed, the industry standard is for the piping associated with underground hydrocarbon liquid storage facilities to be designed, built, operated, and maintained according to OSHA PSM requirements.

In sum, we believe the Conway, KS facility piping systems in question are not subject to PHMSA jurisdiction because of PHMSA's own exclusions, regulation by other agencies, and longstanding industry practice. Mid-Continent Fractionation and Storage, LLC would appreciate the opportunity to discuss this further with you and/or your staff face-to-face at a time convenient for you, so we can resolve this issue. Please let me know if you are open to such a discussion.

Please contact me at 918.573.9708 if you should have any questions.

Sincerely,

Robert Cronk, Jr.
Vice-President, Technical Services

cc: Lee Andrews-Tulsa
Raj Basi - Tulsa
John Connelly - Tulsa
Rob Hawksworth - Tulsa
Dave Keylor-Tulsa

2006-004705
Conway

CLD entered ✓ JLC
Docket entered
Scan: ✓ Yes ___ No
Pleadings Index:
___ Yes ✓ No

REQUEST FOR SPECIFIC INFORMATION

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

February 15, 2006

Mr. Bob Cronk
Vice – President of Technical Services
Mid-Continent Fractionation & Storage, LLC
One Williams Center, Mail Drop WRC3-9
Tulsa, OK 74101

Dear Mr. Cronk:

On September 19-23, 2005, a representative of the Pipeline and Hazardous Materials Safety Administration (PHMSA) conducted a standard inspection of your storage facilities located in Conway, KS. At that time, your personnel indicated that the storage field was not a PHMSA jurisdictional facility. The only jurisdictional facilities were the pipelines to and from the storage field and the fractionation plant. Additionally, they felt that the facilities were under Process Safety Management (PSM) required under the Occupational, Safety and Health Administration (OSHA). As a result, the records and field inspection of the storage facilities were not done at that time.

Pursuant to Chapter 601 of 49 United States Code, PHMSA requests the following specific information regarding your pipeline operations and facilities to determine Mid-Continent Fractionation & Storage, LLC's compliance with the Pipeline Safety Regulations (Title 49, Code of Federal Regulations, Part 195).

Please provide the following information:

1. The reasons as to why your company believes that these facilities are not considered jurisdictional to PHMSA.

2. Any documentation that you believe clarifies the jurisdiction of these storage facilities.

Please provide this information to our office within 45 days of your receipt of this letter, and for each document you submit, please provide a copy in electronic format whenever possible.

If you have any questions concerning this request, please contact our office at 816-329-3800.

Sincerely,

Ivan A. Huntoon
Director, Central Region
Pipeline and Hazardous Materials Safety Administration

U.S. Department
of Transportation
**Research and
Special Programs
Administration**

400 Seventh St., S.W
Washington, D.C. 20590

December 18, 2003

Certified Mail –7002 0510 0002 0439 8186-Return Receipt Requested

Mr. Al Talley
Williams Midstream Gas & Liquids
P.O. Box 21899, WRC 3-9
Tulsa, OK 74121-1899

Re: RSPA Sequence Number 1551 (Conway Response Zone)

Dear Mr. Talley,

The Research and Special Programs Administration (RSPA) has reviewed the September 9, 2003 revision for the Facility Response Plan (FRP). Williams Midstream Gas & Liquids submitted the revision to address the findings in our review (RSPA letter dated April 11, 2003). We acknowledge the plan's designation from a "significant and substantial harm" to a "substantial harm" plan. The revised plan satisfactorily addressed all of our findings as a "substantial harm" plan. Enclosed are the results of the review. RSPA appreciates your effort to address them.

You submitted this plan to us on December 24, 2001. As required by the regulation, we will review the entire plan every five years from the last plan submission date. At that time, you can either submit a revised plan or a letter informing us that the plan on file with us is current for the required review. The next submission date will be December 24, 2006.

Please refer to the "RSPA Plan Sequence Number" listed above in all plan-related correspondence, including e-mails. E-mail is the preferred method for submitting inquiries, questions and comments to me at le.herrick@rspa.dot.gov. You can also telephone me at (202) 366-5523 or fax me at (202) 366-4566. Thank you for your cooperation.

Sincerely,

L.E. Herrick
Response Plans Officer

Enclosure

Operator Name: Williams Midstream Gas and Liquids (formerly Mid-America Pipe Line Company)

RSPA Sequence No: 1551 **Facility or Zone Name: Conway Response Zone**

Date of Review: December 18, 2003

Summary: Williams Midstream Gas and Liquids's September 9, 2003 letter accompanying the plan revision established that the operator has reduced its pipeline assets and no longer operates any pipeline section in the Conway Response Zone that is longer than 10 miles in length. For this reason, the operator changed the harm classification posed by spills from the remaining pipelines from significant and substantial harm to substantial harm in the plan revision. RSPA acknowledges the plan's re-designation as a substantial harm plan. The September 9, 2003 revision submitted to address the plan review findings in RSPA's April 11, 2003 letter provides sufficient information in the plan for RSPA to consider the plan complete with respect to the requirements of 49 CFR 194 as a substantial harm plan. The table below summarizes the results of RSPA's review of the submitted revision.

Deficient Protocol	Is Plan Complete as a Substantial Harm Plan With Respect to Protocol?
Protocol 5.1	Yes. The revised plan establishes general methods and strategies to contain spills on water that are consistent with the applicable ACP (Section 2, pages 2, 3 and 10; Section 6, page 2).
Protocol 6.1	Yes. The revised plan establishes spill recovery strategies appropriate for the response zone and consistent with the applicable ACP (Section 6).
Protocol 8.1	Yes. The revised plan establishes protection strategies appropriate for the response zone and consistent with the applicable ACP (Section 2, page 2; Section 6, page 4).
Protocol 10.1	Yes. The revised plan gives the quantities of each type of communications equipment available to the operator (Section 7, pages 2 and 5).
Protocol 10.4	Yes. The revised plan lists only Haz-Mat Response Inc. as a contracted USCG-classified OSRO (Section 3, page 8; Appendix B).
Protocol 10.5	Yes. The revised plan lists only Haz-Mat Response Inc. as a contracted USCG-classified OSRO (Section 3, page 8; Appendix B).
Protocol 16.2	Yes. The revised plan adequately addresses Protocols 5.1, 6.1 and 8.1.
Protocol 16.3	Yes. The revised plan adequately addresses Protocols 10.1, 10.4 and 10.5.

U.S. Department
of Transportation
**Research and
Special Programs
Administration**

400 Seventh St., S.W.
Washington, D.C. 20590

November 4, 2003

Certified Mail – 7002 0510 0002 0439 1668 Return Receipt Requested

Mr. Austin McClain
Magellan Midstream Partners, L.P.
2728 Patton Road
St. Paul, MN 55113

Re: RSPA Plan Sequence Number 1551 (Conway Response Zone)

Dear Mr. Talley,

The Research and Special Programs Administration (RSPA) has received the September 9, 2003 revision of your Facility Response Plan (FRP) referenced above with your letter dated September 9, 2003. Mr. Allen G. Talley submitted this revision to address the findings in our review (RSPA letter dated April 11, 2003). We will review the revision to determine whether the revised plan fully satisfy the planning standards established by 49 CFR Part 194, *Response Plans for Onshore Oil Pipelines*.

After we complete the review, we will notify you of any remaining deficiencies for you to correct to bring the plan into full compliance. If there are no deficiencies, we will approve the plan for five years.

Please refer to the "RSPA Plan Sequence Number" listed above in all plan-related correspondence, including e-mails. E-mail is the preferred method for submitting inquiries, questions and comments to me at le.herrick@rspa.dot.gov. You can also telephone me at (202) 366-5523 or fax me at (202) 366-4566. Thank you for your cooperation.

Sincerely,

L. E. Herrick
Response Plans Officer

Ext # 7184 File # 1738

Williams Midstream
Gas & Liquids
P.O. Box 21899, WRC 3-9
Tulsa, OK 74121-1899

September 9, 2003

Ms. L. E. Herrick
Response Plans Officer
US DOT Office of Pipeline Safety
400 Seventh Street, S.W. room 7128
Washington, D.C. 20590

Re: RSPA Sequence Number-1551 (Conway Response Zone)

Dear Ms. Herrick,

In response to RSPA's review of the Williams Conway Response Zone Plan in a letter dated April 11, 2003, Williams is submitting updates and changes to the plan. Williams has sold a majority of the pipeline assets in the zone to Enterprise and, therefore, has reduced the pipeline assets it operates in the zone. As a result of the sale, Williams no longer operates any pipeline section in the zone that is longer than 10 miles in length and, therefore, under 49 CFR 194.103 (c) the pipeline facilities are not significant and substantial harm facilities. Although Williams, under 49 CFR 194.101, must submit a plan that meets the requirements of 49 CFR 194, approval of the plan by RSPA is not required.

In order to meet planning requirements of 49 CFR 194 the Williams Conway Response Zone Plan has been revised to reflect the current operations at the facility and to address the findings in your March 11, 2003 letter. The deficient protocols as listed in the letter are addressed as follows:

PROTCOL	FINDING	RESPONSE
5.1	The revised Section 6.2 no longer refers to the use of the containment strategies in the applicable ACP but establishes general methods and strategies to contain spills on water. …Recommendation: Address the necessary response information in the *Emergency Response Plan* in the FRP or submit it to be included as part of the FRP.	• Potential response actions have been added to Volume 1, Section 2, and Figure 2-1. • Potential Response locations have been added to the map in Volume 2. • Volume 1 Section 6.2 wording has been changed to more clearly include reference to the containment, recovery and clean-up strategies in the *EPA Regional Integrated Contingency Plan Region 7* (ICP). The ICP is the applicable ACP in Region 7. The response strategies referenced in 6.2 are consistent with the ICP.

6.1	As in the case of the revision to the plan to address the finding for Protocol 5.1, the revised Section 6.2 establishes general methods and strategies to recover spills on water and impacted shorelines….. Recommendation: Address the necessary response information in the *Emergency Response Plan* in the FRP or submit it to be included as part of the FRP.	See response to 5.1.
8.1	Although the revised Section 6.2 establishes general methods and strategies to contain and recover/cleanup spills based on the types of waters and shorelines in the response zone, the revised plan still does not address the strategies to protect the identified sensitive areas based on the protection priorities outlined in the plan….Establish protection strategies to address protection priorities outlined in the FRP.	See Response to 5.1.
10.4	According to the revised OSRO notification information in Figure 3.1-3 and Appendix B1.1, the operator has Environmental Specialists, Inc. who is currently not a USCG-classified OSRO….Recommendation: Describe the response equipment available from Environmental Specialists, Inc. including the quantities, types and de-rated recovery capacities of the recovery equipment, lengths and types of boom…….	Only USCG-classified OSROs' are listed in the plan. Environmental Specialists, Inc. is no longer listed. Therefore, the response equipment does not need to be listed.
10.5	The plan revisions do not describe the procedures or provisions to ensure that Environmental Specialists, Inc. uses maintained response equipment….Recommendation: Describe environmental Specialists, Inc.'s response equipment maintenance procedures….	Only USCG-classified OSROs' are listed in the plan. Environmental Specialists, Inc. is no longer listed. Therefore, the maintenance procedures do not need to be listed.

10.1	The revised Section 7.1.6 and Appendix G establish the responsibilities and the procedures to address the response communications. However, as in the previous version of the plan, the plan does not give the quantities of the communications equipment owned by the operator and the types and quantities that are available from the communications companies in the area identified as being available to the operator. Recommendation: Give the quantities of each type of communications equipment available to the operator to address response communications in the worst case discharge.	Sections 7.1.1 and 7.1.6 have been revised to list the sources of the communications equipment.
16.2	The revised plan does not address adequately the findings for Protocols 5.1, 6.1, and 8.1. Recommendation: See Recommendations for Protocols 5.1, 6.1 and 8.1.	See responses for 5.1, 6.1 and 8.1.
16.3	The revised plan does not address adequately the findings for Protocols 10.1, 10.4 and 10.5. Recommendation: See the recommendations for Protocols 10.1, 10.4 and 10.5.	See responses for 10.1, 10.4 and 10.5.

The revisions to the plan and instructions for the replacement of pages in your copies are enclosed. If you have any questions or require additional information please contact me.

Sincerely,
Midstream Gas and Liquids

Al Talley
Environmental Specialist Senior
918/573-1691

Enclosure

U.S. Department
of Transportation
**Research and
Special Programs
Administration**

400 Seventh St., S.W.
Washington, D.C. 20590

June 24, 2003

Certified Mail –7002 0510 0002 0439 2672-Return Receipt Requested

Mr. Allen G. Talley
Williams Energy Services
Mid-Stream Gas and Liquids
One Williams Center, MD WRC3-9
Tulsa, OK 74171-1899

Re: RSPA Sequence Number- 1551 (Conway Response Zone)

Dear Mr. Talley,

You requested an extension for the submission of your Facility Response Plan Revisions (RSPA plan sequence number 1551) in your letter dated June 12, 2003.

This letter grants you an extension as requested. Your revisions are due no later than September 11, 2003.

If you have any questions regarding this matter, please telephone me at (202) 366-5523 or contact me by fax at (202) 366-4566. Thank you for your cooperation.

Sincerely,

L. E. Herrick
Response Plans Officer

U.S. Department
of Transportation
**Research and
Special Programs
Administration**

400 Seventh St., S.W.
Washington, D.C. 20590

April 11, 2003

Certified Mail –7000 1670 0011 6380 8778-Return Receipt Requested

Ms. Joyce Chillingworth
Williams Energy Services
One Williams Center, Maildrop 28-1
Tulsa, OK 74172

Re: RSPA Sequence Number- 1551 (Conway Response Zone)

Dear Ms. Chillingworth,

The Research and Special Programs Administration (RSPA) has reviewed the plan revisions submitted to address the plan review findings in our letter dated 18 March 2002. We have determined that the plan still does not satisfy fully the planning standards established by 49 CFR Part 194, *Response Plans for Onshore Oil Pipelines.*

Mid-America Pipe Line Company still has temporary approval for the plan as provided in our letter dated 24 January 2002. We cannot issue final approval until the plan meets all the requirements of the regulation. The enclosed review report provides directions to correct the remaining findings. Submit two copies of your plan revisions to my attention. Please provide the necessary revisions within 90 days of receiving this letter. If 90 days are not sufficient time to comply with this request, please provide a written request for an extension and specify the reason and the additional time needed.

Please submit the revisions to my attention.

If the revisions are sent via the United States Postal Service, please send to:
Mr. James Taylor
Response Plans Officer
US DOT Office of Pipeline Safety
P.O. Box 267
Alexandria, VA 22313-0267

If the revisions are sent via any other carrier, please send to:
Mr. James Taylor
Response Plans Officer
US DOT Office of Pipeline Safety
400 Seventh Street, S.W. Room 7128
Washington, D.C. 20590

Ext. # [illegible] File # 1219 1247 1419 1449 Act. # [illegible]

If you have any questions regarding this matter, please telephone me at (202) 366-8860 or fax me at (202) 366-4566. Thank you for your continuing cooperation.

Sincerely,

James S. Taylor
Response Plans Officer

Enclosure

Ext # 6044 File # 1219 1247 1419 1449 Act # 6023

TECHNICAL RESPONSE PLANNING CORPORATION™
8203 Willow Place South, Suite 160, Houston, Texas 77070 Office: (281) 955-9600 Fax: (281) 955-0369 E-Mail: spills@trpcorp.com Internet: www.trpcorp.com

August 28, 2002

James S. Taylor
Response Plans Officer
US DOT Office of Pipeline Safety
P.O. Box 267
Alexandria, VA 22313-0267

RE: Conway Response Zone Spill Response Plan

Dear Mr. Taylor:

Enclosed are two sets of revisions for the above referenced Plan. Please update the copies you currently hold.

If you have any questions, please contact me at 281-955-9600.

Respectfully,
TECHNICAL RESPONSE PLANNING CORPORATION

Michele Desmond

Michele Desmond
Project Manager

MD:

Enclosure

Priority Mail

cc: Joyce Chillingworth

TECHNICAL RESPONSE PLANNING CORPORATION™

8203 Willow Place South, Suite 160, Houston, Texas 77070 Office: (281) 955-9600 Fax: (281) 955-0369 E-Mail: spills@trpcorp.com Internet: www.trpcorp.com

August 28, 2002

Joyce Chillingworth
Environmental Specialist
Williams Energy Services
EHS&T Department
One Williams Center, MD 28-1
Tulsa, OK 74172

RE: Conway Response Zone Spill Response Plan

Dear Ms. Chillingworth:

Enclosed is one set of revisions for the above referenced Plan. Please update the copy you currently hold.

If you have any questions, please contact me at 281-955-9600.

Respectfully,
TECHNICAL RESPONSE PLANNING CORPORATION

Michele Desmond

Michele Desmond
Project Manager

MD:lp

Enclosure

Federal Express

TECHNICAL RESPONSE PLANNING CORPORATION™
8203 Willow Place South, Suite 160, Houston, Texas 77070 Office: (281) 955-9600 Fax: (281) 955-0369 E-Mail: spills@trpcorp.com Internet: www.trpcorp.com

August 28, 2002

Ms. Helen Walden
Safety Representative
Williams Pipe Line Company
1426 5th Avenue
McPherson, KS 67460

RE: Conway Response Zone Spill Response Plan

Dear Ms. Walden:

Enclosed are five sets of revisions for the above referenced Plan. Please update the copies you currently hold.

If you have any questions, please contact me at 281-955-9600.

Respectfully,
TECHNICAL RESPONSE PLANNING CORPORATION

Michele Desmond

Michele Desmond
Project Manager

MD:

Enclosure

Federal Express

cc: Joyce Chillingworth

TECHNICAL RESPONSE PLANNING CORPORATION™
8203 Willow Place South, Suite 160, Houston, Texas 77070 Office: (281) 955-9600 Fax: (281) 955-0369 E-Mail: spills@trpcorp.com Internet: www.trpcorp.com

August 28, 2002

Mid-America Pipeline Operations Control
1800 S. Baltimore, 4th Floor
Williams South One
Tulsa, OK 74119

RE: Conway Response Zone Spill Response Plan

Dear Sir or Madam:

Enclosed is one set of revisions for the above referenced Plan. Please update the copy you currently hold.

If you have any questions, please contact me at 281-955-9600.

Respectfully,
TECHNICAL RESPONSE PLANNING CORPORATION

Michele Desmond

Michele Desmond
Project Manager

MD:lp

Enclosure

Federal Express

cc: Joyce Chillingworth

TECHNICAL RESPONSE PLANNING CORPORATION
8203 Willow Place South, Suite 160, Houston, Texas 77070 Office: (281) 955-9600 Fax: (281) 955-0369 E-Mail: spills@trpcorp.com Internet: www.trpcorp.com

December 24, 2001

Mr. James S. Taylor
Response Plans Officer
US DOT Office of Pipeline Safety
P.O. Box 267
Alexandria, VA 22313-0267

RE: Conway Response Zone Spill Response Plan

Dear Mr. Taylor:

Enclosed are two copies of the above referenced plan. Use these copies to replace the copies you currently hold.

If you have any questions or require additional information, contact Technical Response Planning Corporation at (281) 955-9600.

Sincerely,
TECHNICAL RESPONSE PLANNING CORPORATION

Michele Desmond

Michele Desmond
Assistant Project Manager

Enclosures

Priority Mail

cc: Ms. Joyce Chillingworth

Section 2

SECTION 2
INITIAL RESPONSE ACTIONS

FIGURE 2-1 - INITIAL RESPONSE ACTION CHECKLIST

	RESPONSE ACTION	PERSON TAKING ACTION (INITIALS)	DATE/TIME ACTION TAKEN
First Person to Discover Spill			
1.	Immediately notify the Supervisor/Area Manager and Operations Control Center. Take appropriate action to protect life and ensure safety of personnel. Contact the appropriate local emergency responders or request the office to do so.		
2.	Immediately shutdown pipeline (if applicable). (b) (7)(F) [redacted]		
3.	Secure the scene. Isolate the area and assure the safety of people and the environment. Keep people away from the scene and outside the safety perimeter.		
Supervisor/Area Manager (QI)			
4.	Assume role of Incident Commander until relieved.		
5.	Conduct preliminary assessment of health and safety hazards.		
6.	Evacuate non-essential personnel, notify emergency response agencies to provide security, and evacuate surrounding area (if necessary).		
7.	Call out spill response contractors (**FIGURE 3.1-3**).		
8.	If safe to do so, direct facility responders to shut down potential ignition sources in the vicinity of the spill, including motors, electrical pumps, electrical power, etc., drivers away from truck rack if spill occurs there.		
9.	If safe to do so, direct facility responders to shut down and control the source of the spill. Be aware of potential hazards associated with product and ensure that lower explosive limits (LELs) are within safe levels before sending personnel into the spill area.		
10.	If safe to do so, direct facility responders to stabilize and contain the situation. This may include berming or deployment of containment and/or sorbent boom.		
11.	For low flash oil (<100°F); consider applying foam over the oil, using water spray to reduce vapors, grounding all equipment handling the oil, and using non-sparking tools.		
12.	If there is a potential to impact shorelines consider lining shoreline with sorbent or diversion boom to reduce impact.		
13.	Notify Local Emergency Responders. Obtain the information necessary for the Release Reporting Database and phone this information to the Spill Reporting Contractor.		

Note: Other Response Action Documentation may be substituted as appropriate for facility conditions.

SECTION 2 - INITIAL RESPONSE ACTIONS

	RESPONSE ACTION	PERSON TAKING ACTION (INITIALS)	DATE/TIME ACTION TAKEN
Spill Response Contractor			
14.	Notify appropriate regulatory agencies or request that the Environmental Department initiate these notifications (**FIGURE 3.1-3**). • National Response Center • SERC • State Police/County Sheriff • LEPC		
Incident Commander/Qualified Individual			
15.	Activate all or a portion of Spill Management Team (SMT) (as necessary).		
16.	Ensure the SMT has mobilized spill response contractors (if necessary). It is much better to demobilize equipment and personnel, if not needed, than to delay contacting them if they are needed.		
17.	Document all response actions taken, Including notifications, agency/media meetings, equipment and personnel mobilization and deployment, and area impacted.		
18.	Initiate spill tracking and surveillance operations. Determine extent of pollution via surveillance aircraft or vehicle. Estimate volume of spill utilizing information in **SECTIONS 2.2** and **2.3**. Send photographer / videographer, if safe.		

SECONDARY RESPONSE ACTIONS

(Refer to SMT job descriptions in the Emergency Response Guidebook for detailed checklists of responsibilities.)

FACILITY SPECIFIC RESPONSE CONSIDERATIONS

(Refer to Appendix C for maps sensitivity locations and initial response locations.)

Diversionary Berms or Dams may be constructed on the facility to prevent discharge of oil. At the East Station and Truck Rack spills may be collected in existing impoundments along the creek.

Offsite response locations are located where the intermittent creeks cross 5th Ave, 7th Ave., 8th Ave, Moccasin Road and Kiowa Road. The creeks are generally less than 2 feet deep and less than 25 feet across. Depending on the flow, dams, underflow dams or containment booms may be used. Protective booming may be required for the designated wetland area.

Note: Other Response Action Documentation may be substituted as appropriate for facility conditions.

2.1 SPILL DETECTION AND MITIGATION PROCEDURES

See **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 2.1-1 and the ERP**; not all mitigation procedures are appropriate of every spill, specific mitigation procedures will be used as appropriate. Worst case discharge volume calculations and discussion are provided in **APPENDIX D.**

FIGURE 2.1-1 SPILL MITIGATION PROCEDURES

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

2.2 SPILL SURVEILLANCE GUIDELINES

- Surveillance of an oil spill should begin as soon as possible following discovery to enable response personnel to assess spill size, movement, and potential impact locations.
- Dispatch observers to crossings downstream or down gradient to determine the spills maximum reach.
- Clouds, shadows, sediment, floating organic matter, submerged sand banks or wind-induced patterns on the water may resemble an oil slick if viewed from a distance.
- Depending on site conditions, spill surveillance may be accomplished through the use of helicopters or small planes. If air surveillance is required, helicopters are preferred due to their superior visibility and maneuverability. If fixed-wing planes are to be used, high-wing types provide better visibility than low-wing types.
- All observations should be documented in writing and with photographs and/or videotapes.
- Describe the approximate dimensions of the oil slick based on available reference points (i.e. facilities or landmarks); use the aircraft or vehicle to traverse the length and width of the release (or 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.
- Surveillance is also required during spill response operations to gauge the effectiveness of response operations; to assist in locating skimmers; and assess the spill's size, movement, and impact.
- An Oil Spill Surveillance Checklist is provided in **FIGURE 2.2-1.**

FIGURE 2.2-1 - OIL SPILL SURVEILLANCE CHECKLIST

Record your observations of spilled oil either in a notebook or directly on a chart of the area under observation. This checklist is an aid for organizing your observations. Depending on site conditions, all fields may not be applicable.

General Information	
Date:	River stage:
Time:	On-scene weather (wind, sea state, visibility):
Incident name:	Platform (helicopter fixed-wing aircraft, boat, vehicle):
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	
Oil/Slick location(s):	Color and appearance (i.e. rainbow, dull or silver sheen, black or I brown in color or mousse).
Oil/Slick dimensions:	Percent coverage:
Orientation of oil/slick(s):	Is oil: recoverable (Y/N)?:
Distributor of oil (i.e. windrows, streamers, pancakes or patches):	
Considerations	
• During surveillance, travel beyond known impacted areas to check for additional oil spill sites • Include the name and phone number of the person making the observations • Clearly describe the locations where oil is observed and the areas where no oil has been seen	
Other Observations	
Response Operations	
Equipment deployment (general locations where cerement is working and whether they are working in the heaviest concentration of oil):	
Boom or temporary dam deployment (general locations, 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):	

2.3 SPILL VOLUME ESTIMATING

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

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

Some rapid methods to estimate spill size are:

- Transfer operations: Multiply the pumping rate by the elapsed time that the leak was in progress, plus the drainage volume of the line between the two closest valves or isolation points (volume loss = pump rate [bbls/min] x elapsed time [min] + line contents [bbl])
- Tank overfills: Elapsed time multiplied by the pumping rate
- Visual assessment of the surface area and thickness (**FIGURE 2.3-1**); the method may yield unreliable results because:
  - Interpretation of sheen color varies with different observers
  - Appearance of a oil release or slick varies depending upon amount of available sunlight, sea-state, and viewing angle
  - Different products may behave differently, depending upon their properties

FIGURE 2.3-1 - SPILL ESTIMATION FACTORS

OIL THICKNESS ESTIMATIONS (ON WATER)				
Standard Form	Approx. Film Thickness		Approx. Quantity of Oil in Film	
	Inches	mm		
Barely Visible	0.0000015	0.00004	25 gals/mile^2	44liters/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	1,167liters/km^2
Dark	0.00008	0.002	1,332 gals/mile^2	2,237 llters/km^2
Thickness of light oils: 0.0010 inches to 0.00010 inches				
Thickness of heavy oils: 0.10 Inches to 0.010 inches				

2.3.1 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. Hand calculations typically utilize the following assumptions:

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

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

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

2.4 INITIAL CONTAINMENT ACTIONS

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

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

Selection of the appropriate location and method will depend upon:

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

2.4.1 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

Section 3

SECTION 3
NOTIFICATIONS/TELEPHONE NUMBERS

3.1 Emergency Information and Notification Procedures

Figure 3.1-1 - Emergency Notification Flow Chart

Figure 3.1-2 - Release/Spill Report Form

Figure 3.1-3 - Notifications and Telephone Numbers

3.1 EMERGENCY INFORMATION AND NOTIFICATION PROCEDURES

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 Supervisor/Area Manager and Operations Control Center.
- The Supervisor/Area Manager (QI) will assume the role as Incident Commander (Qualified Individual (QI)). Any release will be reported to the Emergency Response Contractor (ERC); the ERC will make the required notifications. In the event that the ERC cannot be contacted, the QI and will conduct notifications as illustrated in the Notification Flow Chart **(FIGURES 3.1-1)**.

The priority of actions and response procedures will depend upon actual circumstances and will be determined by the Incident Commander. The facility Emergency Response Plan (developed for MCFS operations in McPherson County) is the primary plan; other plans are developed to provide additional guidance as appropriate.

This section also contains the following:

- **FIGURE 3.1-2, Release/Spill Report Form is obsolete; retained in document for informational purposes only.** The Spill Response contractor uses a database populated with the required information (similar in content to the form shown). Follow-up notifications are the responsibility of the Liaison Officer.
- **FIGURE 3.1-3** provides a notification summary and documentation form to assist in making required notifications in the event that the Spill Response Contractor is not able to make notifications.

FIGURE 3.1-1 - EMERGENCY NOTIFICATION FLOW CHART

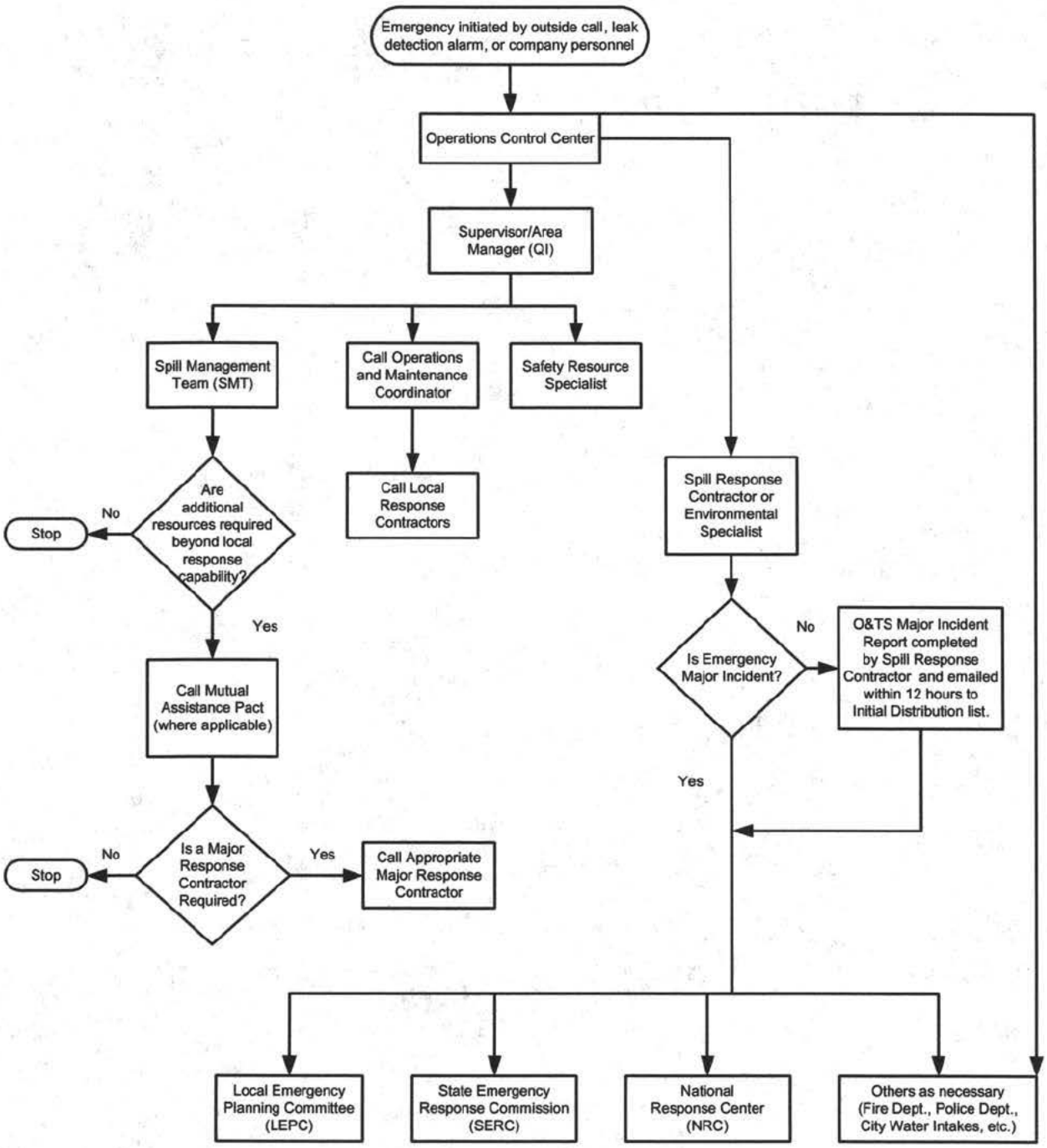


FIGURE 3.1-2 - RELEASE/SPILL REPORT FORM (FORM OBSOLETE)

Initial Report

Call Spill Response Contractor at 1-800-688-6747 to report all releases (suspected or confirmed)

1) **This is a Williams Midstream or Williams Field Services Incident Notification**
2) Callers Name and Title: _____
3) Call Back Phone: _____
4) ***Intentionally Blank*** _____
5) Is this a Drill? _____
6) Is this a facility or Pipeline Release? _____
7) If Pipeline, is it in DOT Jurisdiction ? _____
8) What is the Name of the facility / Pipeline where the release occurred? _____
9) State of Release? _____
   Area: _____
   District: _____
   Nearest City and State: _____
   County / Parish: _____
   Section: _____
   Township: _____
   Range: _____
   Address of Contact: _____
   _____
10) Date Release Discovered? _____
11) Time Release Discovered? _____ Time Zone: _____
12a) Product Released: _____
   Total (Quantity Release)? _____
   Released as a Gas or Liquid? _____
   If Liquid, What Quantity contained or Recovered? _____
   Estimated Amount Recovered Soil: _____
   Estimated Total Amount Recovered: _____

Original Report Date:

Page 1 of 2

FIGURE 3.1-2 - RELEASE/SPILL REPORT FORM - CONTINUED

Other Products Released (If any): (FORM OBSOLETE)

13) If Liquid, was a stream or Waterway effected? _____ Waterway or Stream Name? _____

14) If Liquid, did the Release go outside the Facility Boundary? _____

15) Has the Release been Stopped or Contained? _____

16) If Stopped, What was the Stop Time of the Release? _____

17) What is the Source of the Release? _____

18) What is the Preliminary (Pre-Investigation) Cause? (Check all that apply)

Excavation Damage:	Intentional Blowdown:	Equipment Failure:
Corrosion - Internal:	Incorrect Operation Operator:	Third Party Damage:
Corrosion - External:	Incorrect Operation Contractor:	Non-Maintenance:
Maintenance:	Other:	Natural Forces:
Material or Weld Failure:	If Other Explain:	

19) Weather Conditions (Check All that Apply): _____

20) Anyone Hospitalized? _____

21) Significant Media Coverage? _____

22) Fatality? _____

23) Injury? _____

24) Fire? _____

25) Explosion? _____

26) Preliminary Loss Damage Estimate: _____

Release Reportable? (Spill Response Contractor Response) _____

Why Release is Reportable? (Spill Response Contractor Response) _____

Agency(s) Contacted:

Additional Information:

District Supervisor: _____

Safety Contact for this Release: _____

Environmental Contact for Release: _____

Form Completed by: _____

Completion Date: _____

Form was e-mailed to Williams on: _____

24 hour report was reviewed by: (Initials Only) _____

Original Report Date:

FIGURE 3.1-3 - NOTIFICATIONS AND TELEPHONE NUMBERS

*24 Hour Number

AFFILIATION	PHONE NUMBER	RESPONSE TIME TO FACILITY
A. COMPANY PERSONNEL:		
Midstream Gas Control	(800) 635-7400*	
Conway East Station	(620) 834-2111	
Conway West Station	(620) 834-2138	
Conway Fractionator	(620) 834-2171	
Enterprise Control Room	(620) 834-2000	
NCRA control room/McPherson Valley Uplands	(620) 834-2226	
Randy Heinrichs (QI and SMT Lead) Manager Conway Area Qualified Individual	(620) 834-2118 (Office) (b) (6) (620) 242-7597 (Mobile)	30 minutes
Rob Burton (QI and SMT Member) Supervisor	620-834-2172 (Office) (b) (6) 620-755-6282 (Mobile)	1 hour
Luc Staedtler (QI and SMT Member) Supervisor	620-834-2166 (Office) 620-755-4927 (Mobile)	20 minutes
Jim Sauer (SMT Member) Operations Coordinator	(620) 834-2151 (Office) (b) (6) (620) 245-1040 (Mobile)	20 minutes
Cathy Orban Environmental Specialist	(918) 573-1535 (Office) (b) (6) (918) 630-5067 (Mobile)	
Joe McCartney Safety Representative	(620) 834-2153 (Office) (b) (6) (620) 755-2319 (Mobile)	
Jeff Pounds Media Contact	(918) 573-3332 (Office) (b) (6) (918) 407-2611 (Mobile)	
Sara Delgado Media Contact	(918) 573-2713 (Office) (b) (6) (918) 633-3453 (Mobile)	
Risk Management Insurance Division	(918) 573-3995 (Office) (918) 324-3995 (Pager)	
B. INITIAL NOTIFICATIONS:		
National Response Center (NRC) Direct Line	(800) 424-8802* (202) 267-2675	
U.S. Department of Transportation, Office of Pipeline Safety Washington D.C.	(202) 366-4595	
Spill Response Contractor / Notifications	**(800) 688-6747***	
Spill Response Contractor / Response	**(800) 229-5252*** (913) 782-5151	

FIGURE 3.1-3 - NOTIFICATIONS AND TELEPHONE NUMBERS

AFFILIATION	PHONE NUMBER	TIME CONTACTED
C. RECOMMENDED NOTIFICATIONS FOR A SPILL THAT MAY IMPACT THE CONWAY AREA:		
Federal Agencies		
Environmental Protection Agency, Region VII	(913) 281-0991	
USDOT Office of Pipeline Safety, Central Region	(816) 329-3800	
U.S. Fish and Wildlife	(785) 539-3474 (785) 539-8567 (FAX)	
State Agencies		
Kansas Department of Health & Environment (Spills)	(785) 296-1679	
Kansas Department of Health & Environment, Salina Region 5	(785) 827-9639 (785) 827-1544 (FAX)	
Kansas Division of Emergency Management (Spills Line)	(785) 296-3176*	
Kansas Highway Patrol	(785) 296-3102*	
Kansas Dept. of Wildlife & Parks Div. of Fisheries and Wildlife	(316) 672-5911 (316) 672-6020 (FAX)	
Local Agencies		
McPherson County LEPC	(620) 245-1260* (620) 245-1269 (FAX)	
McPherson County 24 Hour Emergency Number Fire, Emergency Medical, Law Enforcement	911 or (800) 365-9780*(non-emergency) (620) 245-1265 (FAX)	
Fire Departments		
McPherson County	911* (800) 365-9780*	
Law Enforcement		
McPherson County Sheriff	(620) 245-1225	
Emergency Medical Services		
McPherson County 24 Hour Emergency Number	911 or (800) 365-9780*	
McPherson Memorial Hospital	(620) 241-2250	
USCG Classified Spill Response Contractors		
Haz-Mat Response Inc. (Olathe, KS)	(316) 729-9242 (800) 229-5252	
Other Service Providers		
Piping Technology Co.	(620) 241-3592	
T. D. Williamson	(918) 446-6327	

*24 Hour Number

FIGURE 3.1-3 - NOTIFICATIONS AND TELEPHONE NUMBERS

AFFILIATION	PHONE NUMBER	TIME CONTACTED
C. RECOMMENDED NOTIFICATIONS FOR A SPILL THAT MAY IMPACT THE CONWAY AREA, CONTINUED		
Neighbors		
Kansas-Oklahoma Railroad	(316) 261-6133	24 hour Dispatcher
See ERP for expanded list		
Television Stations(Wichita)		
KAKE (ABC)	(316) 943-4221	
KCTU (IND)	(316) 267-8855	
KSNW (NBC)	(316) 292-1111	
KWCH (CBS)	(316) 838-1212 or (888) 512-6397	
Radio Stations (Wichita)		
KICT (Rock FM)	(316) 838-9141	
KFDI (Country FM)	(316) 838-9141	
KMUW (NPR FM)	(316) 978-6789	
KRBB (Mix FM)	(316) 436-1098 - listener line (316) 494-6600 - business line	
Newspapers		
East Wichita News	(316) 681-2655	
The McPherson Sentinel	(620) 241-2422	
The Hutchinson News	(620) 694-5700	
Wildlife Rehabilitation Specialists		
Tri-State Bird Rescue & Research	(302) 737-7241 (800) 710-0695 or 0696* (pager)	
International Bird Rescue Research Center	(510) 841-9086	
Weather		
National Weather Service	(316) 945-3687	
D. SENSITIVITIES DOWNSTREAM OF THE CONWAY AREA		
Parks and Recreation		
McPherson Valley Wetlands	(620) 241-7669	
McPherson Valley Uplands – NCRA control room	(620) 834-2226	

Section 4

SECTION 4
RESPONSE TEAM ORGANIZATION

4.1 DESCRIPTION

The Spill Management Team (SMT) has been identified and organized to plan for and manage oil spills. (The SMT may also respond to other emergencies.) The SMT is composed of Company personnel from the Conway Office. Additional personnel from outlying offices can be used (if needed). The SMT will develop strategies and priorities for a response, then will supervise contractors, handle safety and security matters, and will provide logistical support for contractor personnel. The SMT will handle all communications with the media and the public. The SMT will train by participating in exercises as noted in **APPENDIX A**.

4.2 ACTIVATION PROCEDURES

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

4.3 TEAM MEMBER RESPONSE TIMES

See **FIGURE 3.1-3** for each team member's response time.

4.4 INCIDENT COMMAND SYSTEM/UNIFIED COMMAND

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

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

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

These three people share decision-making authority within the Incident Command System and are each responsible for coordinating other federal, state, and company personnel to form an effective integrated Spill Management Team.

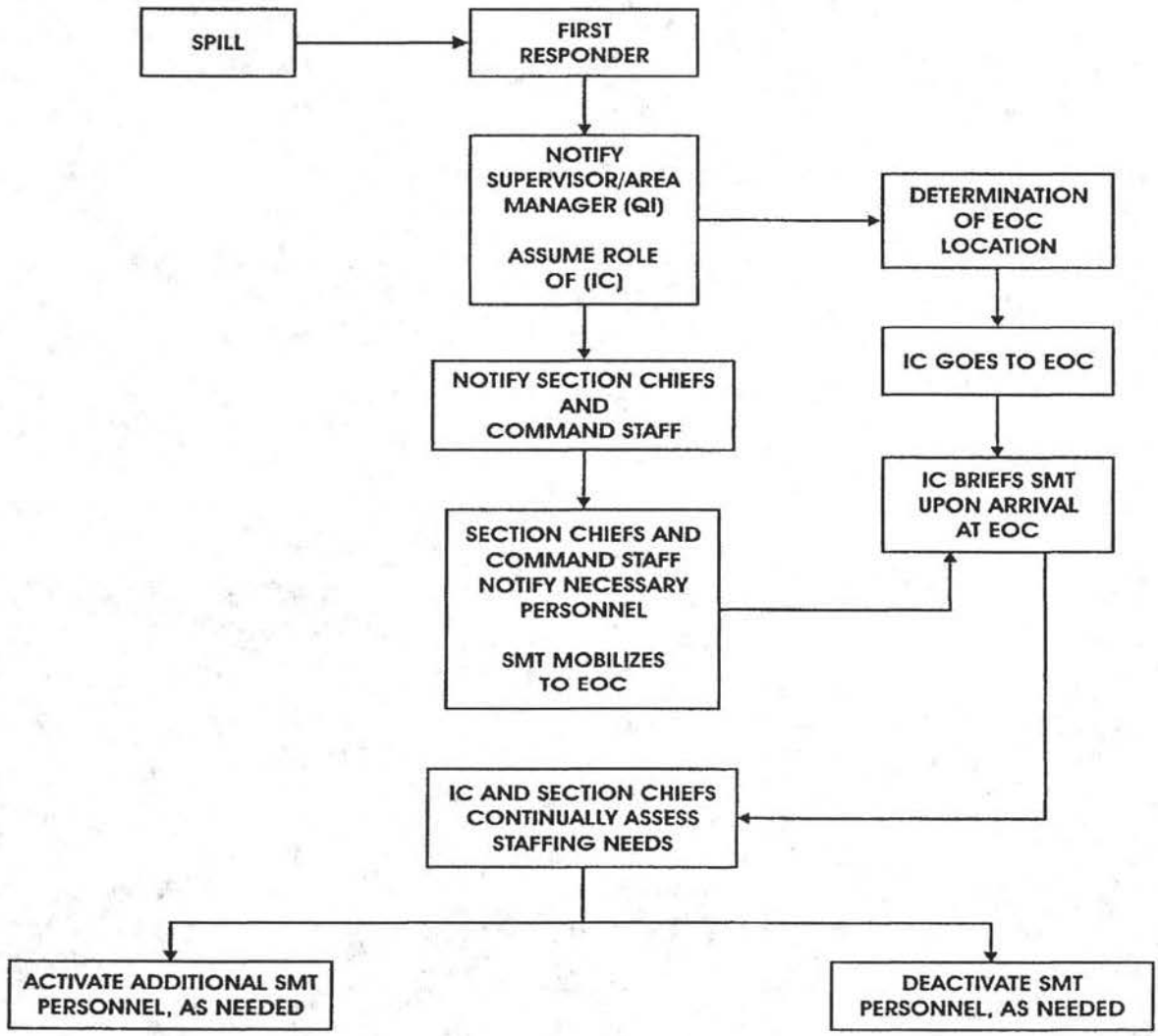
4.5 QUALIFIED INDIVIDUAL

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

- Activate internal alarm and hazard communication systems to notify all appropriate personnel
- Notify all response personnel and contractors (as needed)
- Identify the character, exact source, amount, and extent of the release and other necessary items needed for notifications
- Notify and provide information to appropriate federal, state and local authorities
- Assess the interaction of the spilled substance with water and/or other substances stored at the facility and notify on-scene response personnel of assessment
- Assess possible hazards to human health and the environment
- Assess and implement prompt removal actions
- Coordinate rescue and response actions
- Access company funds to initiate clean-up activities
- Direct clean-up activities until properly relieved of the responsibility or the incident is terminated

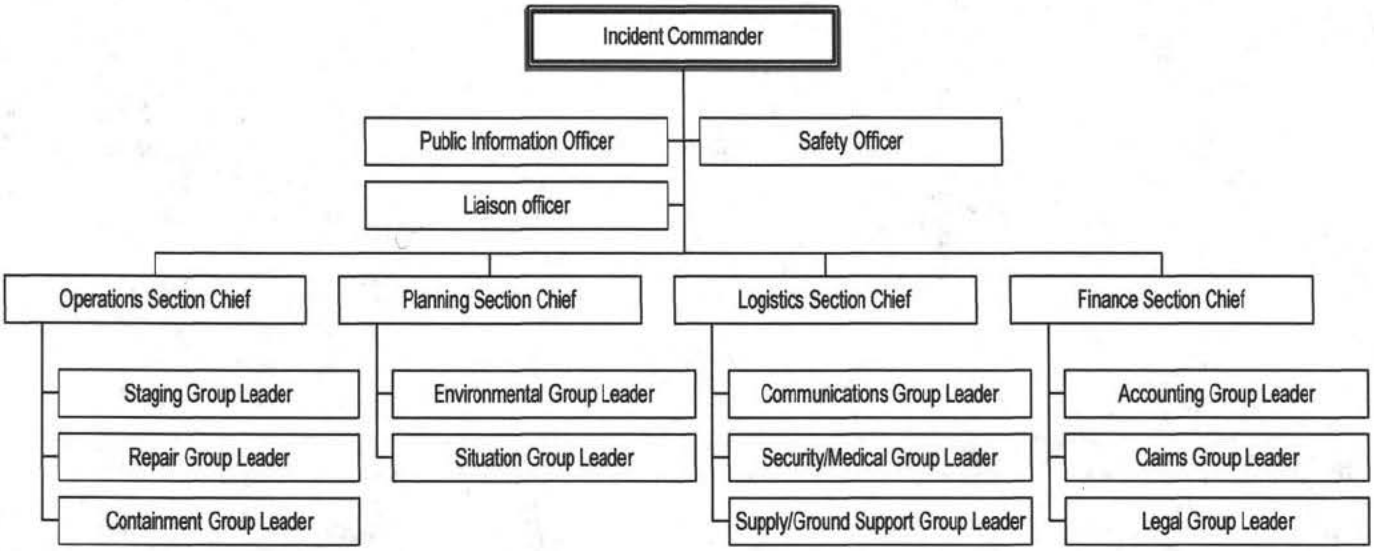
For further information on Qualified Individual's training, refer to **APPENDIX A**. Phone numbers for Qualified Individuals are provided in **FIGURES 1-3** and **3.1-3**.

FIGURE 4.5-1 - SPILL MANAGEMENT TEAM ACTIVATION PROCEDURE



EOC - EMERGENCY OPERATIONS CENTER
IC - INCIDENT COMMANDER
SMT - SPILL MANAGEMENT TEAM

FIGURE 4.5-2 - SPILL MANAGEMENT TEAM ORGANIZATION CHART



INCIDENT COMMANDER
The Incident Commander (IC) manages all activities related to an emergency response and acts as Qualified Individual (QI). As such, the Incident Commander needs to be familiar with the contents of the Williams Petroleum Services Contingency Plan, Emergency Response Plan (ERP), and the Spill Prevention Control and Countermeasure Plan (SPCC). The Incident Commander (IC) must also be familiar with the operation of the Incident Command System (ICS) and the Unified Command Structure (UCS).

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Section 5

SECTION 5
INCIDENT PLANNING

Note: Other Forms and Plans (Site Safety and Health, Decontamination, Disposal, Incident Security and Demobilization) may be substituted as appropriate for facility conditions. ICS forms and Plans are provided for example, training or usage.

5.1 DOCUMENTATION PROCEDURES

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

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

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

5.2 ICS FORMS

Note: Other Forms for Documentation may be substituted as appropriate for facility conditions. ICS forms provided for example, training or usage.

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

  ICS forms may be used if the situation requires.

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

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

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

- **INCIDENT ACTION PLAN**

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

  In addition, these Incident Command System (ICS) forms may be found on the U. S. Coast Guard web page:

  http://www.uscg.mil/hq/g-m/nmc/response/index.htm

  or

  http://response.restoration.noaa.gov/oilaids/ICS/intro.html

- **INCIDENT STATUS SUMMARY - ICS 209**

  Used to inform personnel about the status of response efforts. It is not included in the Incident Action Plan (IAP).

1. Incident Name	2. Prepared by: (name) Date: Time:	INCIDENT BRIEFING ICS 201-OS (pg 1 of 4)

3. Map / Sketch (Include maps drawn here or attached, showing the total area of operations, the incident site/area, overflight results, trajectories, impacted shorelines, or other graphics depicting situational and response status)

1. Incident Name	2. Prepared by: (name) Date: Time:	INCIDENT BRIEFING ICS 201-OS (pg 2 of 4)

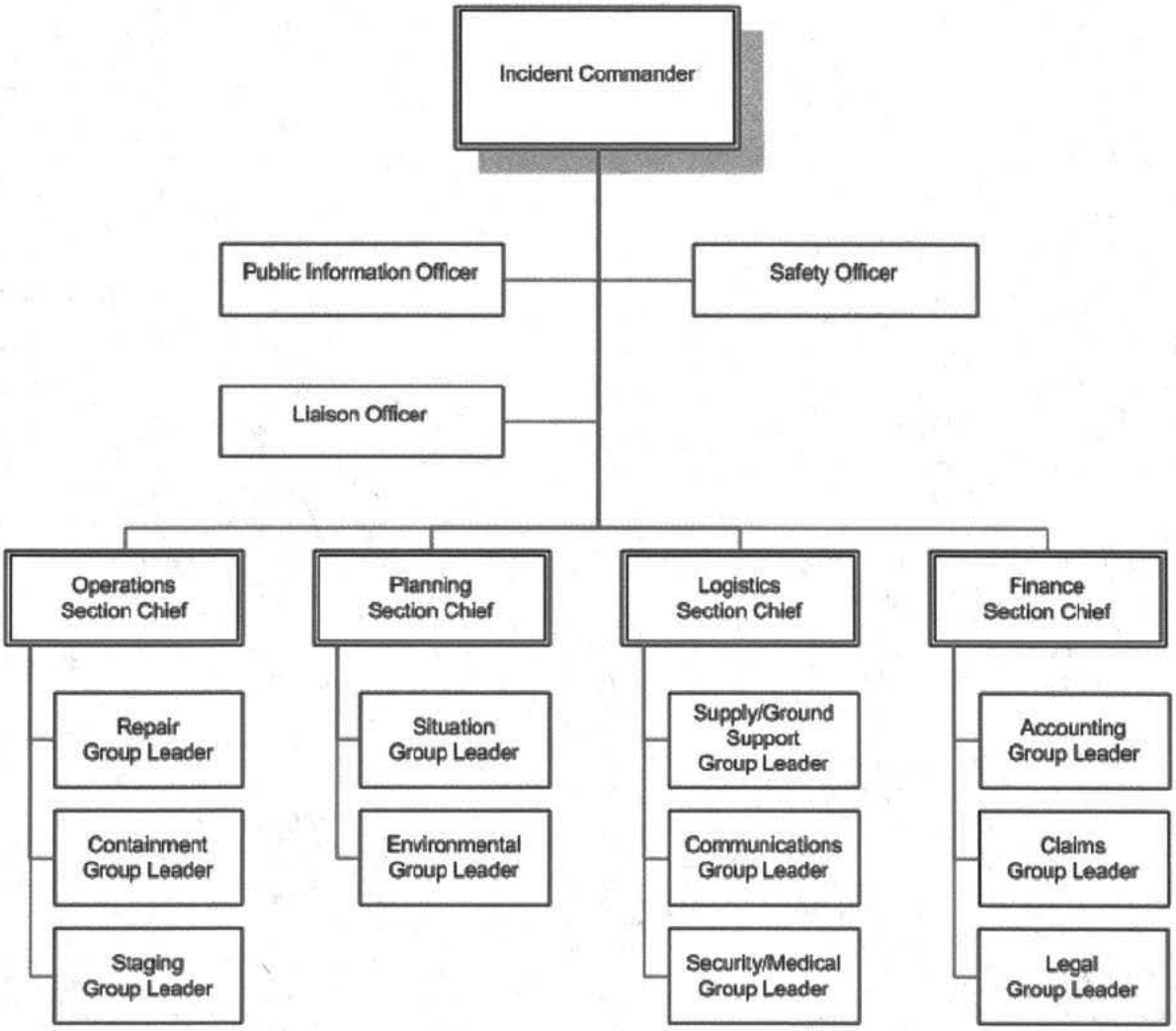
4. Initial Incident Objectives

5. Summary of Current Actions

Time	Action / Note

1. Incident Name	2. Prepared by: (name) Date: Time:	INCIDENT BRIEFING ICS 201-OS (pg 3 of 4)

6. Current Organization



1. Incident Name	2. Prepared by: (name) Date: Time:	INCIDENT BRIEFING ICS 201-OS (pg 4 of 4)

7. Resources Summary

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

INCIDENT BRIEFING June 2000 ICS 201-OS (pg 4 of 4)

Electronic version: NOAA 1.0 June 1, 2000

1. Incident Name	2. Operational Period to be covered by IAP (Date / Time) From: To:	IAP COVER SHEET

3. Approved by:

FOSC _____

SOSC _____

RPIC _____

_____ _____

_____ _____

INCIDENT ACTION PLAN

The items checked below are included in this Incident Action Plan:

☐ ICS 202-OS (Response Objectives)

☐ ICS 203-OS (Organization List) - OR - ICS 207-OS (Organization Chart)

☐ ICS 204-OSs (Assignment Lists)
One Copy each of any ICS 204-OS attachments:

- ☐ Map
- ☐ Weather forecast
- ☐ Tides
- ☐ Shoreline Cleanup Assessment Team Report for location
- ☐ Previous day's progress, problems for location

☐ ICS 205-OS (Communications List)

☐ ICS 206-OS (Medical Plan)

☐ _____

☐ _____

☐ _____

☐ _____

☐ _____

☐ _____

4. Prepared by: Date / Time

IAP COVER SHEET June 2000

Electronic version: NOAA 1.0 June 1, 2000

1. Incident Name	2. Operational Period (Date / Time) From:	INCIDENT OBJECTIVES ICS 202-OS

3. Overall Incident Objective(s)

Ensure the Safety of Citizens and Response Personnel
Control the Source of the Spill
Manage a Coordinated Response Effort
Maximize Protection of Environmentally-Sensitive Areas
Contain and Recover Spilled Material
Recover and Rehabilitate Injured Wildlife
Remove Oil from Impacted Areas
Minimize Economic Impacts
Keep Stakeholders and Public Informed of Response Activities

4. Objectives for specified Operational Period

5. Safety Message for specified Operational Period

Approved Site Safety Plan Located at:

6. Weather **See Attached Weather Sheet**

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

8. Time of Sunrise **Time of Sunset**

9. Attachments (mark "X" if attached)

☐ Organization List (ICS 203-OS)	☐ Medical Plan (ICS 206-OS)	☐ Resource at Risk Summary (ICS 232-OS)
☐ Assignment List (ICS 204-OS)	☐ Incident Map(s)	☐ _____
☐ Communications List (ICS 205-OS)	☐ Traffic Plan	☐ _____

10. Prepared by: (Planning Section Chief) **Date / Time**

INCIDENT OBJECTIVES June 2000 ICS 202-OS

Electronic version: NOAA 1.0 June 1, 2000

SECTION 5 - INCIDENT PLANNING

1. Incident Name	2. Operational Period (Date / Time) From:	ORGANIZATION ASSIGNMENT LIST ICS 203-OS

3. Incident Commander and Staff

	Primary	Deputy
Federal:		
State:		
RP(s):		
Safety Officer:		
Information Officer:		
Liaison Officer:		

4. Agency Representatives

Agency	Name

5. PLANNING SECTION

Chief	
Deputy	
Resources Unit	
Situation Unit	
Environmental Unit	
Documentation Unit	
Demobilization Unit	
Technical Specialists	

6. LOGISTICS SECTION

Chief	
Deputy	
a. Support Branch	
Director	
Supply Unit	
Facilities Unit	
Transportation Unit	
Vessel Support Unit	
Ground Support Unit	
b. Service Branch	
Director	
Communications Unit	
Medical Unit	
Food Unit	

7. OPERATION SECTION

Chief		
Deputy		
a. Branch I - Division/Groups		
Branch Director		
Deputy		
Division / Group		
Division / Group		
Division / Group		
Division / Group		
Division / Group		
b. Branch II - Division/Groups		
Branch Director		
Deputy		
Division / Group		
Division / Group		
Division / Group		
Division / Group		
Division / Group		
c. Branch III - Division/Groups		
Branch Director		
Deputy		
Division / Group		
Division / Group		
Division / Group		
Division / Group		
Division / Group		
d. Air Operations Branch		
Air Operations Br. Dir		
Air Tactical Supervisor		
Air Support Supervisor		
Helicopter Coordinator		
Fixed Wing Coordinator		

8. FINANCE / ADMINISTRATION SECTION

Chief	
Deputy	
Time Unit	
Procurement Unit	
Compensation/Claims Unit	
Cost Unit	

9. Prepared By: (Resources Unit) **Date / Time**

ORGANIZATION ASSIGNMENT LIST June 2000 ICS 203-OS

Electronic version: NOAA 1.0 June 1, 2000

1. Incident Name	2. Operational Period (Date / Time) From: To:	ASSIGNMENT LIST ICS 204-OS
3. Branch	4. Division/Group	

5. Operations Personnel Name Affiliation Contact # (s)

Operations Section Chief: _____

Branch Director: _____

Division/Group Supervisor: _____

6. Resources Assigned This Period "X" indicates 204a attachment with special instructions

Strike Team / Task Force / Resource Identifier	Leader	Contact Info. #	# of Persons	Notes / Remarks	
					☐
					☐
					☐
					☐
					☐
					☐
					☐

7. Assignments

8. Special Instructions for Division / Group

9. Communications (radio and / or phone contact numbers needed for this assignment)

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

Emergency Communications

Medical _____ Evacuation _____ Other _____

10. Prepared By (Resource Unit Leader)	Date / Time	11. Approved By (Planning Section Chief)	Date / Time

ASSIGNMENT LIST June 2000 ICS 204-OS

Electronic version: NOAA 1.0 June 1, 2000

1. Incident Name	2. Operational Period (Date / Time) From: To:	ASSIGNMENT LIST ATTACHMENT ICS 204a-OS
3. Branch	4. Division / Group	
5. Strike Team / Task Force / Resource Identifier	6. Leader	7. Assignment Location

8. Work Assignment Special Instructions (if any) [Ops]

9. Special Equipment / Supplies Needed for Assignment (if any) [Ops]

10. Special Environmental Considerations (if any) [P.S.C.]

11. Special Site-Specific Safety Considerations (if any) [S.O.]

Approved Site Safety Plan Located at:

12. Other Attachments (as needed)

- ☐ Map
- ☐ Shoreline Cleanup Assessment Team Report
- ☐ _____
- ☐ Weather Forecast
- ☐ Tides
- ☐ _____

13. Prepared by: (Resources Unit Leader) **Date / Time**

ASSIGNMENT LIST ATTACHMENT June 2000 ICS 204a-OS

Electronic version: NOAA 1.0 June 1, 2000

1. Incident Name	2. Operational Period (Date / Time) From: To:	INCIDENT RADIO COMMUNICATIONS PLAN ICS 205-OS

3. BASIC RADIO CHANNEL USE

SYSTEM / CACHE	CHANNEL	FUNCTION	FREQUENCY	ASSIGNMENT	REMARKS

4. Prepared by: (Communications Unit) **Date / Time**

INCIDENT RADIO COMMUNICATIONS PLAN June 2000 ICS 205-OS

Electronic version: NOAA 1.0 June 1, 2000

1. Incident Name	2. Operational Period (Date / Time) From: To:	COMMUNICATIONS LIST ICS 205A-OS

3. Basic Local Communications Information

Assignment	Name	Method(s) of contact (radio frequency, phone, pager, cell #(s), etc.)

4. Prepared by: (Communications Unit) **Date / Time**

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

3. Medical Aid Stations

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

4. Transportation

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

5. Hospitals

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

6. Special Medical Emergency Procedures

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

1. Incident Name	2. Operational Period (Date / Time) From: To:	Time of Report	INCIDENT STATUS SUMMARY ICS 209-OS

3. Spill Status (Estimated, in Barrels) [Ops & EUL/SSC]

Source Status: ☐ Secured ☐ Unsecured

Remaining Potential (bbl): _____

Rate of Spillage (bbl/hr): _____

	Since Last Report	Total
Volume Spilled		
Mass Balance / Oil Budget		
Recovered Oil		
Evaporation		
Natural Dispersion		
Chemical Dispersion		
Burned		
Floating, Contained		
Floating, Uncontained		
Onshore		
Total spilled oil accounted for:		

4. Waste Management (Estimated) [Ops / Disposal]

	Recovered	Stored	Disposed
Oil (bbl)			
Oily Liquids (bbl)			
Liquids (bbl)			
Oily Solids (tons)			
Solids (tons)			

5. Shoreline Impacts (Estimated, in miles) [PSC / EUL / SSC]

Degree of Oiling	Affected	Cleaned	To Be Cleaned
Light			
Medium			
Heavy			
Total			

6. Wildlife Impacts [Ops / Wildlife Br.]

Numbers in ( ) indicate subtotal that are threatened / endangered species.

	Captured	Cleaned	Released	DOA	Died in Facility: Euth.	Died in Facility: Other
Birds						
Mammals						
Reptiles						
Fish						
Total						

7. Safety Status [Safety Officer]

	Since Last Report	Total
Responder Injury		
Public Injury		

8. Equipment Resources [RUL]

Description	Ordered	Available / Staged	Assigned	Out of Service
Spill Resp. Vsls				
Fishing Vessels				
Tugs				
Barges				
Other Vessels				
Skimmers				
Boom (ft.)				
Sbnt/Snr Bm. (ft.)				
Vacuum Trucks				
Helicopters				
Fixed Wing				

9. Personnel Resources [RUL]

Description	People in Cmd. Post	People in the Field	Total People On Scene
Federal			
State			
Local			
RP			
Contract Personnel			
Volunteers			
Total Response Personnel from all Organizations:			

10. Special Notes

11. Prepared by: (Situation Unit Leader)

INCIDENT STATUS SUMMARY June 2000 ICS 209-OS

Electronic version: NOAA 1.0 June 1, 2000

5.3 SITE SAFETY AND HEALTH PLAN

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

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

GENERAL SAFETY RULES AND EQUIPMENT:

1. There will be no eating, drinking or smoking in the exclusion zone or the contamination reduction zone.
2. All personnel must pass through the contamination reduction zone to enter or exit the exclusion zone (hot zone).
3. As a minimum, Decontamination Team members must be in one (1) level of protection lower than that of the entry teams.
4. All decontamination equipment and systems must be in place before an entry can be made.
5. Entry team will consist of a minimum of two members with the same number of personnel assigned to a backup team. All entry personnel will adhere to the buddy system.
6. At the end of the incident, or directly after a possible exposure, each entry team member will take a full body shower and launder any personal clothing used at the scene.
7. All breathing air shall be certified as Grade D or better.
8. Where practical, all tools shall be of the non-sparking type.
9. Fire equipment shall be on hand when the situation warrants such support. At a minimum, fire extinguishers shall be available on scene.
10. Since incident evacuation may be necessary if an explosion, fire, or other event occurs; an individual shall be assigned to sound, alert, and notify the responsible command personnel and public officials (if required). The evacuation signal shall be four short blasts on an air horn every 30 seconds until all personnel are known to be evacuated.
11. An adequately stocked Emergency Medical Services (EMS) Unit shall be on site at all times.
12. The location and telephone number of the nearest medical facility shall be posted and known to all personnel.

GENERAL SAFETY BRIEFING:

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

EMERGENCY ACTION CONDITIONS:

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

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

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

Sheltering/Evacuation Plan:
Ordered By:

LIST OF ACCESS AUTHORIZED PERSONNEL (Outside Agencies):
SPECIALIZED TASK ASSIGNMENTS:
LEVELS OF PROTECTION SELECTED:

Initial Site Survey:	A	B	C	D
Entry Team:	A	B	C	D
Backup Team:	A	B	C	D
Decon Team:	A	B	C	D

SKETCH OR ATTACH PLOT PLAN HERE:

RESPONSE SAFETY CHECK-OFF SHEET

TYPE OF RESPONSE:	
Highway	Industrial
Railway	Marine
Residential	Other
Specify:	
TYPE OF SAFETY PLAN:	
Federal	State
Local	Other
Specify:	
SUSPECTED CHEMICALS INVOLVED:	
1.	2.
3.	4.
5.	6.
7.	8.
9.	10.
INITIAL LEVEL OF PROTECTION: (If level D you must justify)	
A **B** **C** **D**	
INITIAL MEDICAL SCREENING COMPLETE: ☐ **Yes** ☐ **No**	
If no, justify:	
In the event of fire or explosion:	
In the event of potential or actual ionizing radiation exposure:	

In the event of spread of contamination beyond the boundaries of the incident:
EMERGENCY SERVICES:
Emergency medical facility:
Ambulance service:
Poison Control Center:
Chemical manufacturer's representative:
EMBERGENCY PROCEDURES (in the event of personnel exposure):
EMERGENCY PROCEDURES (in the event of personnel injury):
HAZARD ASSESSMENT:
Attach Hazardous Materials Safety Data Sheets (MSDS), or other reference materials, for chemicals involved to this document.
MONITORING PROCEDURES:
Monitoring the incident to identify concentration of contaminants in all media. List the instruments to be used and what areas to be monitored.
Hot Zone (Excursion Zone)
Warm Zone (Contamination Reduction Zone)
Cold Zone (Support Zone)

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

PERSONNEL POTENTIALLY EXPOSED TO HAZARDOUS MATERIALS:

NAME	POSITION	DATE/TIME

DECONTAMINATION PROCEDURES: (Contaminated personnel, surfaces, materials, instruments other equipment.)
DECONTAMINATION SOLUTIONS USED:
DISPOSAL PROCEDURES:
Authorized By:

POST RESPONSE:			
Level of protection used:			
A	B	C	D
Justify			
EQUIPMENT DECONTAMINATION:			

	Clothing	SCBA/Resp.	Monitoring
Disposed:			
Cleaned:			
No Action:			

Specify:		
TOTAL APPROXIMATE TIME IN HOT ZONE:	Days	Hours
DATE PREPARED:	PREPARED BY:	
Reviewed By:		
Assistance in preparing this safety plan can be obtained from Haz Mat personnel.		

HEALTH AND SAFETY/RESPONSE PLAN

APPLIES TO SITE:

DATE:

PRODUCTS: **(ATTACH MSDS)**

SITE CHARACTERIZATION

		❒ Marine vessel	❒ Pipeline	❒ Storage facility	
		❒ Truck/Rail car	❒ Other		
Water	❒ Shoreline	❒ Wetlands	❒ Other		
	❒ Rocky	❒ Sandy	❒ Muddy	❒ Other	
	❒ River	❒ Creek	❒ Canal	❒ Bay	❒ Ocean
Land	❒ Mountains	❒ Hills	❒ Brushland	❒ Forest	❒ Grassland
	❒ Other				
Use	❒ Public	❒ Government	❒ Residential	❒ Commercial	
	❒ Recreational	❒ Industrial	❒ Farmland	❒ Other	
Weather	❒ Temp _____ °F	❒ Wind/Dir. _____ mph		❒ Rain	
	❒ Snow	❒ Ice		❒ Other	
Pathways for Dispersion		❒ Air	❒ Water	❒ Land	❒ Other

Site Hazards

❒ Chemical Hazards	❒ Boats
❒ Slips, trips, falls	❒ Helicopters
❒ Heat stress	❒ Noise
❒ Cold stress	❒ Pumps, hoses
❒ Weather	❒ Steam, hot water
❒ Drowning	❒ Fire/Explosion
❒ Heavy equipment	❒ Poor visibility
❒ Drum handling	❒ Motor vehicles
❒ Wildlife/plants	❒ Confined spaces (see attachment/appendix)
❒ Hand/power tools	❒ Ionizing radiation
❒ Lifting	❒ Other

Air Monitoring

% LEL	% O_2	PPM Benzene	PPM H_2S

❒ Other (specify)

❒ See attachment - **Monitoring Results/Methods**

CONTROL MEASURES:

Engineering Controls

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

Personal Protective Equipment (PPE) HAZWOPER Coordination with OSRO

❒ PVC suites	❒ PE/TYVEK suites	❒ Respirator
❒ Site secured	❒ PVC gloves	❒ Other
❒ Other	❒ Hard hats	❒ Eye protection

HEALTH AND SAFETY/RESPONSE PLAN

CONTROL MEASURES (cont'd):

Decontamination

❒ Stations established (see site map)

Sanitation

❒ Facilities provided per OSHA 1910.120(n)

Illumination

❒ Facilities provided per OSHA 1910.120(m)

Medical Surveillance

❒ Facilities provided per OSHA 1910.120(f)

WORK PLAN: (buddy system must be used)

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

TRAINING (HAZWOPER training program):

❒ Verified site workers trained per OSHA 1910.120

ORGANIZATION (See Incident Command System chart.):

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

SITE SECURITY:

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

DATE/TIME/PLAN COMPLETED: **BY:**

SITE DIAGRAM

GENERAL DIAGRAM INSTRUCTIONS

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

5.4 DECONTAMINATION PLAN

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

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

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

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

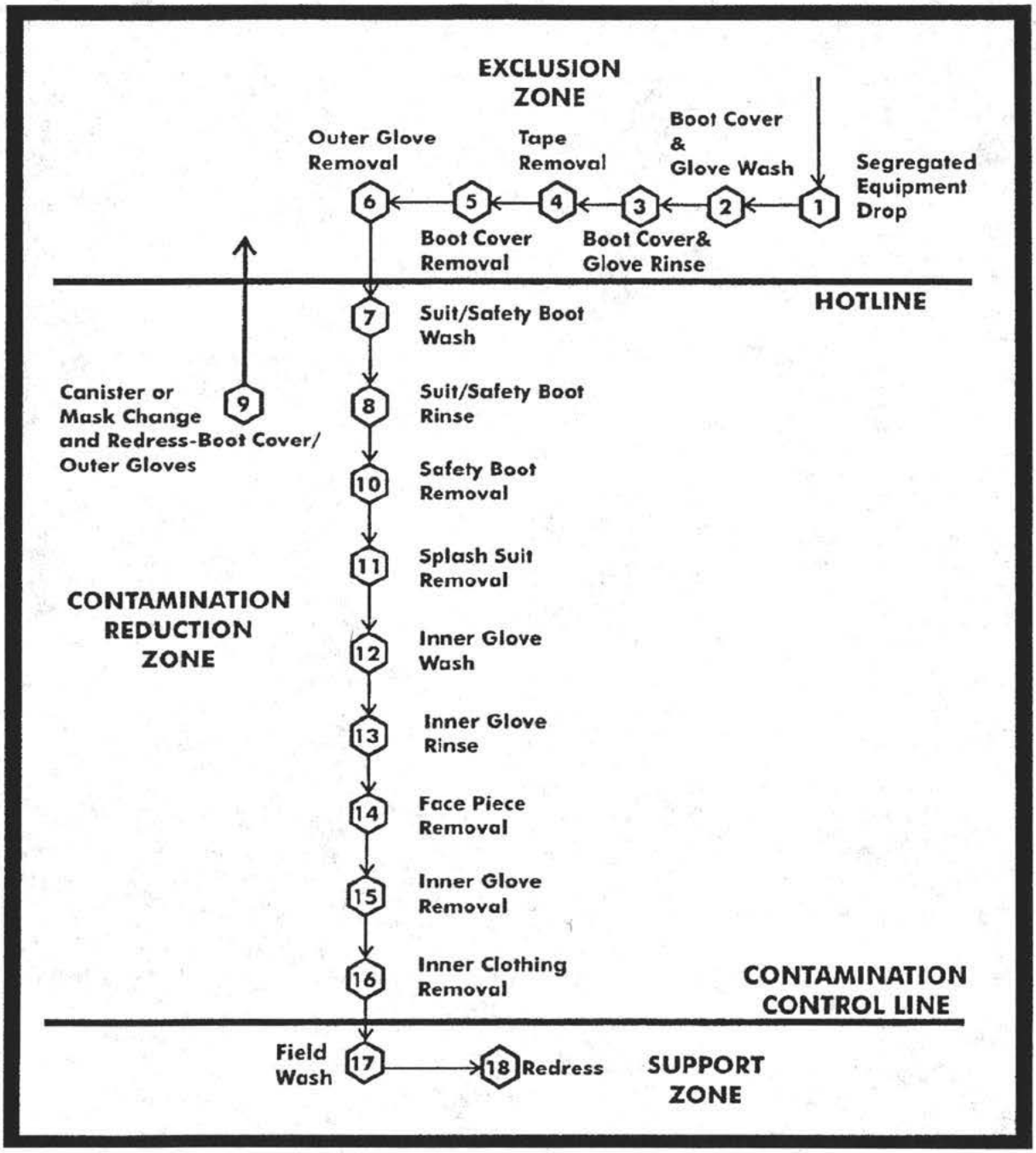
- **Decontamination Stations:**

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

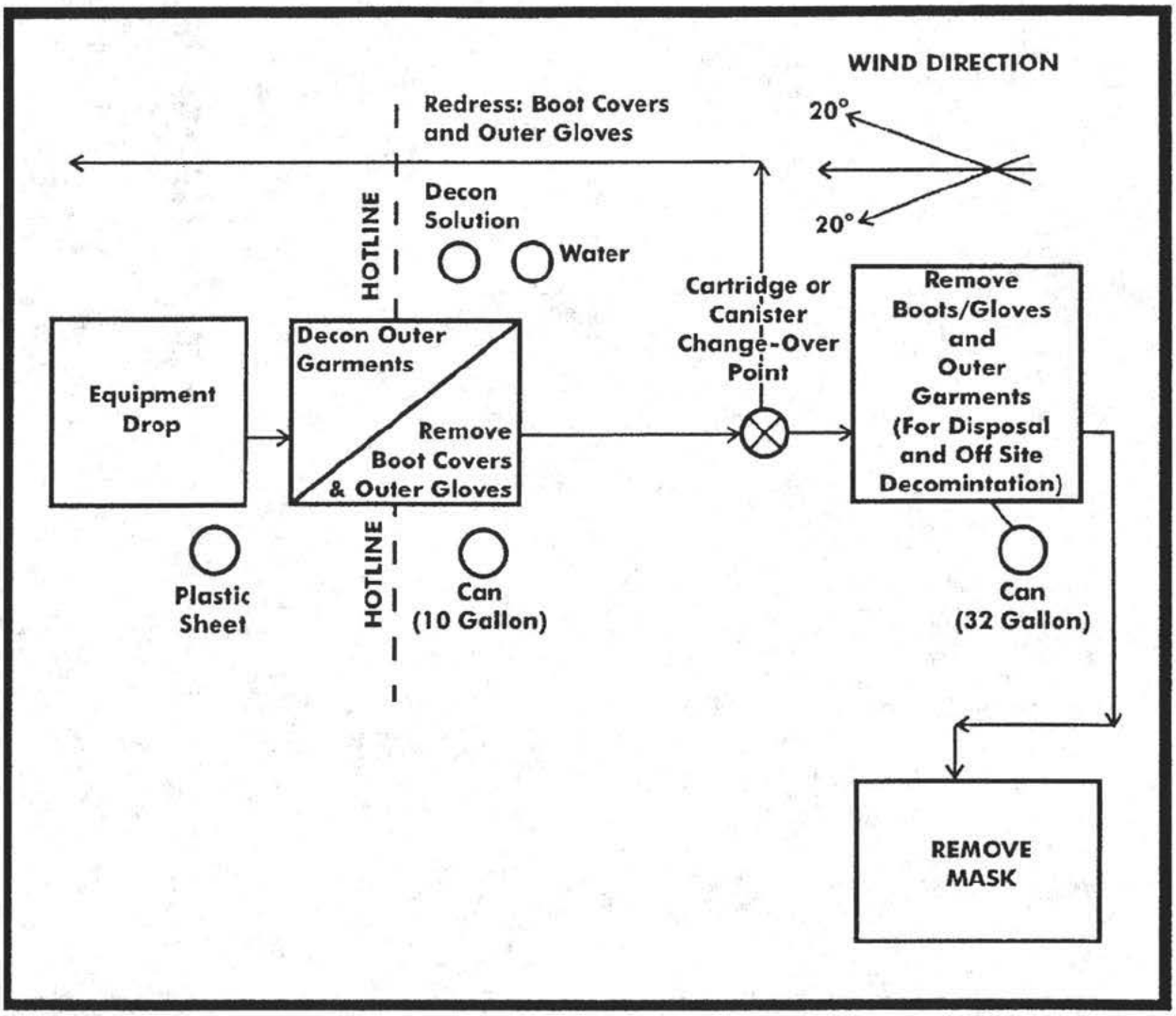
MAXIMUM MEASURES FOR DECONTAMINATION		
STATION 1	Segregated equipment drop	Deposit equipment used on site (tools, sampling devices and containers, monitoring instruments, radios, clipboards, etc.) on plastic drop cloths or in different containers with plastic liners. Segregation at the drop reduces the 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 oft decontamination solution using water. Repeat as many times as necessary.
STATION 9	Canister or mask change	If worker leaves exclusion zone to change canister or this is the last step in the decontamination procedure; worker's canister is exchanged, new outer gloves and boot covers are donned, joints are taped, and the worker returns to duty.
STATION 10	Safety boot removal	Remove safety boots and deposit in container with plastic liner.
STATION 11	Splash suit removal	With assistance of helper, remove splash suit. Deposit in container with plastic liner.
STATION 12	Inner glove wash	Wash inner gloves with decontamination solution.
STATION 13	Inner glove rinse	Rinse inner gloves with water.
STATION 14	Face piece removal	Remove face piece. Deposit in container with plastic liner. Avoid touching face with fingers.
STATION 15	Inner glove removal	Remove inner gloves and deposit in lined container.
STATION 16	Inner clothing removal	Remove clothing soaked with perspiration and place in lined container. Do not wear inner clothing off-site since there is a possibility that small amounts of contamination might have been transferred in removing the protective suit.
STATION 17	Field wash	Shower if highly toxic, skin-corrosive or skin-absorbable materials are known or suspected to be present. Wash hands and face if shower is not available.
STATION 18	Re-dress	Put on clean clothes.

MINIMUM MEASURES FOR DECONTAMINATION		
STATION 1	Equipment drop	Deposit equipment used on site (tools, sampling devices and containers monitoring instruments radios clipboards, etc.) on plastic drop cloths. Segregation at the drop reduces the probability of cross contamination. During hot weather operations, a cool down station may be set up within this area.
STATION 2	Outer garment, boots and gloves wash, and rinse	Scrub outer boots, outer gloves, and splash suit with decontamination solution or detergent and water. Rinse off using copious amounts of water.
STATION 3	Outer boot and glove removal	Remove outer boots and gloves. Deposit in container with plastic liner.
STATION 4	Canister or mask change	If worker leaves exclusion zone to change canister (or mask) or this is the last step in the decontamination procedures; worker's canister is exchanged, new outer gloves and boot covers are donned, joints are taped, the worker returns to duty.
STATION 5	Boot, gloves, and outer garment removal	Boots, chemical-resistant splash suit, inner gloves removed and deposited in separate containers lined with plastic.
STATION 6	Face piece removal	Face piece is removed. Avoid touching face with fingers. Face piece deposited on plastic sheet.
STATION 7	Field wash	Hands and face are thoroughly washed. Shower as soon as possible.

DECONTAMINATION PROCEDURES, MAXIMUM DECONTAMINATION LAYOUT



DECONTAMINATION PROCEDURES, MINIMUM DECONTAMINATION LAYOUT



5.5 DISPOSAL PLAN

Date:	Location:
Source of release:	
Amount of release.	
Incident name:	
State On-Scene Coordinator:	
Federal On-Scene Coordinator:	
Time required for temporary storage:	
Proposed storage method:	

Disposal priorities:

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

Disposal options:

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

Resources required for disposal options:

General information:

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

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

PPE required for waste handling:	
Waste coordinator:	Date:

Resources required for disposal options:

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

Additional Information:
Waste coordinator:

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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

Section 6

SECTION 6
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**. 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 **Appendix C**.

6.2 SPILL CONTAINMENT/RECOVERY

Terrestrial spills typically result from pipeline or tank leaks and tank or tank truck overfills. The Company is equipped with secondary containment systems for areas utilized for oil storage and transfer.

- Storage tank areas have earthen berms for secondary containment
- Truck loading/unloading area(s) are situated on concrete pads and equipped with curbing and drains for spill containment

Each storage tank area drains to a low spot within the berthed areas where storm water and potential spills may accumulate. The water is inspected and drained from the dike through valved drains or by pumping. Dikes are drained under the supervision of facility personnel.

Most spills at terminals are small and occur within an existing secondary containment system which can preclude the need for additional containment activities. In some cases, such as equipment puncturing a storage tank or pipeline, the spill can be relatively large and continue for a significant period of time. Regardless of the size, spills occurring within the storage tank 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.

Containment booming

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

Diversion booming

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

Exclusion booming

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

Sorbent booming

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

Berming/Damming

- Berms may be used to contain or divert terrestrial spills
- Dams or underflow dams may be used in intermittent or small streams

Other clean-up methods include: natural recovery, manual removal/scraping, low-pressure flushing, warm water washing, removal of debris, and burning.

Containment, recovery, and clean-up methods are provided in the EPA Regional Integrated Contingency Plan Region 7, National Oceanic and Atmospheric Administration's (NOAA's) "Shoreline Assessment Manual," and NOAA's "Options for Minimizing Environmental Impacts of Freshwater Spill Response." Guidelines for in-situ burning and the use of chemical agents are available in the Region 7 ICP.

The documents are available at the following web sites:

ICP http://www.epa.gov/region07/cleanup/superfund/integrated_plan.htm

NOAA http://response.restoration.noaa.gov

FIGURE 6.2-1 - RESPONSE TACTICS FOR VARIOUS SHORELINES

TYPES	DESCRIPTION	PREDICTED OIL IMPACT	RECOMMENDED CLEAN-UP ACTIVITY
Developed/ Un-forested 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: o To remove oil o To prepare substrate for re-colonization of barnacle and oyster communities o For aesthetic reasons
Freshwater Flat	• Mud or organic deposits located along the shore or in shallow portions of non-tidal 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 clean-up 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: o A small extent of marsh is affected o A small amount of oil impacts the marsh fringe • The preferred clean-up method is a combination of low-pressure flushing, sorption, and vacuum pumping performed from boats • Any clean-up activities should be supervised closely to avoid excessive disturbances of the marsh surface or roots • Oil wrack and other debris may be removed by hand
Swamp	• Swamps are freshwater wetlands having varying water depths with vegetation types ranging from shrubs and scrubs to poorly drained forested wetlands. Major vegetative types include: scrubs, shrubs, evergreen trees, and hardwood forested woodlands • Birds and mammals use swamps during feeding and breeding activities	• Even small amounts of spilled oil can spread through the swamp • Large spills will cover more area and may persist for decades since water-flushing rates are low • Oil, particularly the heavy fuel oils, will adhere to swamp vegetation • Unlike mangroves, the roots of swamp forest trees are not exposed; thus, little damage to trees is expected. Any underbrush vegetation, however, would be severely impacted	• No cleanup recommended under light conditions • Under moderate to heavy accumulations, to prevent chronic oil pollution of surrounding areas placement of sorbet along fringe swamp forest (to absorb oil as it is slowly released) may be effective under close scientific supervision • Proper strategic boom placement may be highly effective in trapping large quantities of oil, thus reducing oil impact to interior swamp forests • Oil trapped by boom can be reclaimed through the use of skimmers and vacuums

TYPES	DESCRIPTION	PREDICTED OIL IMPACT	RECOMMENDED CLEAN-UP 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 clean-up methods • Should not use sorbents, containment booming, skimming, and vacuuming on gasoline spills • Clean-up 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 clean-up methods • Should not use sorbents, containment booming, skimming, and vacuuming on gasoline spills • Clean-up options include natural recovery, physical herding, sorbents, and debris/vegetation removal
Small lakes and ponds	• Water surface can be choppy • Water levels can fluctuate widely • May completely freeze in winter • Bottom sediments near the shore can be soft and muddy • Surrounding area may include wet meadows and marshes	• Wildlife and socioeconomic areas likely to be impacted • Wind will control the oil's distribution	• Booming, skimming, and vacuuming are the preferred clean-up methods • Should not use containment booming, vacuuming, sorbents, and skimming, on gasoline spills • Clean-up 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 clean-up methods • Should not use containment booming, sorbents, vacuuming and skimming, on gasoline spills • Clean-up options include physical herding, natural recovery debris removal, vegetation removal, and in-situ burn

6.3 WILDLIFE PROTECTION AND REHABILITATION

- The Company will support wildlife protection and rehabilitation efforts during the response, but will not 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.
- As stated in the ICP "All rescue and rehabilitation efforts will be directed by the USFWS and the Division of Fisheries and Wildlife, Kansas Department of Wildlife and Parks" a list of these agencies are included in **FIGURE 3.1-3.**
- Wildlife rehabilitation specialists may be utilized to assist in capturing and rehabilitating oiled animals as well as deterring unaffected animals away from the spill site; a list of wildlife rehabilitation specialists are included in **FIGURE 3.1-3.**

Section 7

SECTION 7
SUSTAINED RESPONSE ACTIONS

7.1 RESPONSE RESOURCES

7.1.1 Response Equipment

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

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

* USCG Classified OSRO

COMPANY/CONTRACTOR	EQUIPMENT	RESPONSE TIME
Mid-Continent Fractionation and Storage, LLC	Communications equipment including: 3 phone lines, 5 faxes, 18 cell phones, 15 radios, 3 radio base stations, and 2-way communication between Williams and local emergency response agencies	At location
Haz-Mat Response Inc. (OSRO)	Booms, skimmers, vac trucks, communications equipment, and heavy equipment	1 hour

7.1.2 Response Equipment Inspection and Labor

Company response resources consist of safety equipment in company vehicles. In general, contractors are used to meet the Federal Tier I, II, and III response planning requirements and will provide the necessary labor and equipment to respond in the event of a spill.

7.1.3 Contractors, Contractor Equipment, and Labor

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

7.1.4 Command Post

In the event of a major spill, both an off-site Emergency Operations Center (EOC) and a 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.			
Identity 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
- 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

7.1.6 Communications Plan

Normal Company communications to each facility are conducted via telephone lines, cellular telephones, two way radios, e-mail, fax machines, and pagers. Additional communications equipment (VHF portable radios with chargers and accessories, command post with UHF, VHF, single sideband, marine, aeronautical, telephone, and hard-line capability) may be provided by the Company or provided by the OSRO. Communications with government agencies, state police, and contractors can be conducted on portable radios. Refer to **FIGURE 7.1-3** for guidelines to setup communications.

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

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.

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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
- 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 and the SIP
- Continuous tracking of oil disposition in order to better estimate amount of waste that could be generated over the short and long-term
- Organization of waste collection, segregation, storage, transportation, and proper disposal
- Minimization of risk of any additional pollution
- Regulatory review of applicable laws to ensure compliance and (if appropriate) obtain permits
- Documentation of all waste handling and disposal activities
- Disposal of all waste in a safe and approved manner

Good hazardous waste management includes:

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

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

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

- Proper disposal
- Minimization of present and future environmental liability

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

- Storage
- Waste segregation
- Packaging
- Transportation

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

Williams/MCFS corporate waste management procedures should be followed if applicable. Otherwise, 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

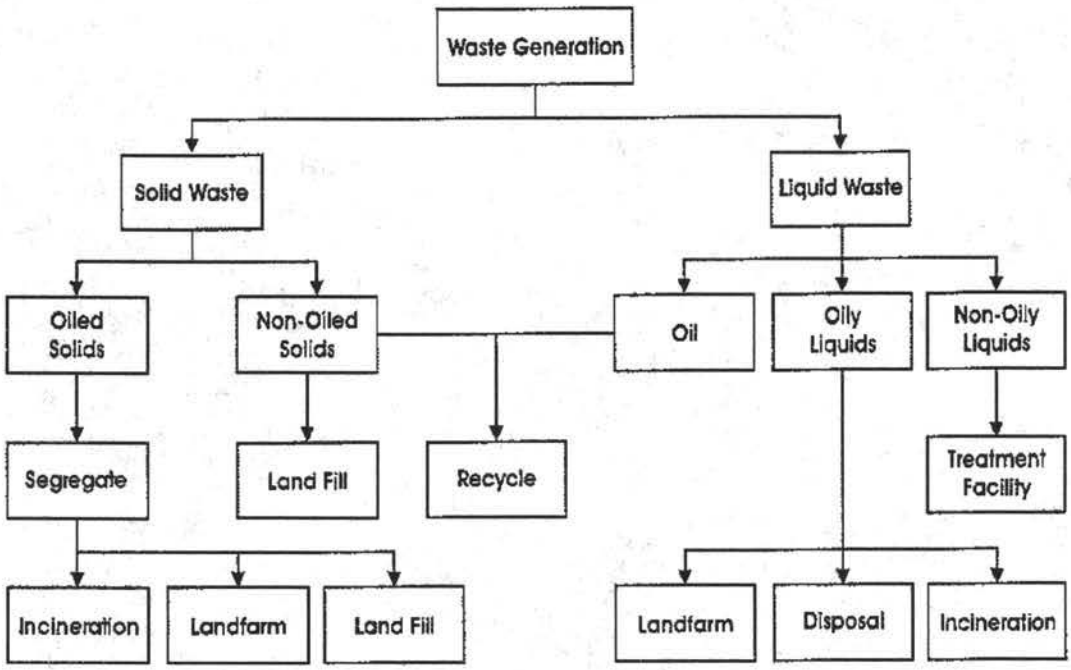


FIGURE 7.3-2 - GENERAL WASTE CONTAINMENT AND DISPOSAL CHECKLIST

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 non-hazardous. is the transporter registered?	
Is the waste being taken to an approved disposal site?	
Is the waste hazardous or Class I non-hazardous?	
If the waste is hazardous or Class I non-hazardous, 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						0.2-0.5 yd^3
Bags		X		X			1.0-2.0 yd^3
Boxes		X		X			1-5 yd^3
Open top roll-off	X	X		X	X		8-40 yd^3
Roll top roll-off	X	X		X	X		15-25 yd^3
Vacuum box	X						15-25 yd^3
Frac tank	X						500-20,000 gal
Poly tank	X						200-4,000 gal
Vacuum truck	X						2,000-5,000 gal
Tank trailer	X						2,000-4,000 gal
Berm, 4 ft							1 yd^3
Bladders							25 gal-1,500 gal

7.4 PUBLIC AFFAIRS

This section contains guidelines for dealing with the media during an emergency. Williams/Mid-Continent Fractionation and Storage has identified company representatives (Media Contacts). However, the Incident Commander may 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 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
- Number of injured or killed, if known
- 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
- 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 for him - 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 7.4-1 - INCIDENT FACT SHEET

What occurred:
When (time).
Where (location):
What are hazards:
How is the situation being handled:
How many people involved:
Confirmed injuries/fatalities:
Treatment location:
Name of injured (release only after next of kin are notified):
Name of fatalities (release only after next of kin are notified):
What agencies have been notified:
On scene? (yes/no):
Who is in-charge:
Has outside help been requested:
Who:
On scene? (yes/no):
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:
Is there a need for evacuation:

Section 8

SECTION 8
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, bioremedlation, 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 two weeks after termination of operations. A Standard Incident Debriefing Form is provided in **FIGURE 8.3-1; however MCFS will follow System Integrity Plan (SIP) requirements for Incident Investigation activities**. The primary purpose of the post-incident review is to identify actual or potential deficiencies in the Plan and determine the changes required to correct the deficiencies. The post-incident review is also intended to identify which response procedures, equipment, and techniques were effective and which were not and the reason(s) why. This type of information is very helpful in the development of a functional Plan by eliminating or modifying those response procedures that are less effective and emphasizing those that are highly effective. This process should also be used for evaluating training drills or exercises. Key agency personnel that were involved in the response will be invited to attend the post-incident review.

FIGURE 8.3-1 - STANDARD INCIDENT DEBRIEFING FORM

Name of incident:
Date:
PERSONEL DEBRIEFED
Name:
Normal duty:
Summary of duties performed during incident (list date, time, and location):
Positive aspects of the response:
Aspects of the response which could be improved:
Name:
Title:
Signature:

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
- All other relative information
- A final signature format or alternate certification language should be used:

The above information is true to the best of my knowledge and belief:

Name:
Title:
Signature:
Date:

APPENDICES

Appendix A

APPENDIX A
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 Area Manager is responsible for the following aspects:
  - Scheduling
  - Maintaining records
  - Implementing
  - Evaluation of the Company's training and exercise program
  - Post-drill evaluation improvements
- **FIGURE A.1-2** provides descriptions of exercise requirements, **FIGURE A.1-3** provides a spill/exercise Documentation form or corresponding Williams form may be used, and **FIGURE A.1-4** provides a log for response equipment testing and deployment drill

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

CORE COMPONENTS	DESCRIPTION
1. Notifications	Test the notifications procedures identified in the Integrated Contingency Plan (ICP) and the Spill Response Plan
2. Staff mobilization	Demonstrate the ability of the Oil Spill Removal Organization (OSRO) to assemble the spill response organization.
3. Ability to operate within the response management system described in the Plan:	
• Unified Command*	Demonstrate the ability of the OSRO to work within a unified command.
• Response management system*	Demonstrate the ability of the OSRO to operate within the framework of the response management system identified in their respective plans.
4. Discharge control*	Demonstrate the ability of the OSRO to control and stop the discharge at the source.
5. Assessment*	Demonstrate the ability of the OSRO 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 OSRO to contain the discharge at the source or in various locations for recovery operations.
7. Recovery*	Demonstrate the ability of the OSRO to recover the discharged product.
8. Protection*	Demonstrate the ability of the OSRO to protect the environmentally and economically sensitive areas identified in the ACP and the respective industry response plan.
9. Disposal*	Demonstrate the ability of the OSRO to dispose of the recovered material and contaminated debris.
10 Communications*	Demonstrate the ability of the OSRO to establish an effective communications system for the spill response organizations.
11. Transportations*	Demonstrate the ability of the OSRO to establish multi-mode transportation both for execution of the discharge and support functions.
12. Personnel support	Demonstrate the ability of the OSRO to provide the necessary support of all personnel associated with response.
13. Equipment maintenance and support*	Demonstrate the ability of the OSRO to maintain and support all equipment associated with the response.
14. Procurement*	Demonstrate the ability of the OSRO to establish and effective procurement system.
15. Documentation*	Demonstrate the ability of the OSRO to document all operational and support aspects of the response and provide detailed records of decisions and actions taken.

*Annual exercise information will be obtained from the OSRO

FIGURE A.1-2 - EXERCISE REQUIREMENTS

EXERCISE TYPE	EXERCISE CHARACTERISTICS
Facility/QI notification	• Conducted quarterly • Safety Representative initiates mock spill notification to QI • Safety Representative documents time/date of notification, name, and phone number of individual contacted • Document in accordance with form in **FIGURE A.1-3**
Equipment deployment	• Conducted annually by the OSRO • Response contractors listed in the plan may participate in annual deployment exercise • Document in accordance with form in **FIGURE A.1-3**
SMT tabletop	• Conducted annually • Tests SMT's response activities/responsibilities • Documents Plan's effectiveness • Must exercise worst case discharge scenario once every three years • Must test all Plan components at least once every three years • Document in accordance with form in **FIGURE A.1-3**
Unannounced	• Company will either participate in unannounced tabletop exercise or equipment deployment exercise on an annual basis, **if selected** • Company may take credit for participation in government initiated unannounced drill in lieu of drill required by PREP guidelines • Plan holders who have participated in a PREP government-initiated unannounced exercise will not be required to participate in another one for at least 36 months from the date of the exercise
Area	• An industry plan holder that participates in an Area Exercise would not be required to participate in another Area Exercise for a minimum of six years
OTHER EXERCISE CONSIDERATIONS	
Drill program evaluation procedures	• Company conducts post-exercise meetings to discuss positive items, areas for improvement, and to develop action item checklist to be implemented later
Records of drills	• Company will maintain exercise records for 5 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 Oil Spill Response Organization listed in Plan as required by PREP guidelines (annual equipment deployment drill, triennial unannounced drill, etc.)

FIGURE A.1-3 - EMERGENCY RESPONSE OR DRILL

LOCATION/FACILITY NAME: ☐ **Conway Underground East** ☐ **Conway Underground West** ☐ **Frac**	**REGION/AREA NAME: Conway**	
PIPELINE LOCATION:	**COUNTY/PARISH/BLOCK: McPherson**	
DATE:	**ATTENDANCE:**	**DRILL LENGTH:**

TYPE OF EXERCISE

☐ ACTUAL ☐ ANNOUNCED ☐ UNANNOUNCED

☐ DEPLOYMENT ☐ **NOTIFICATION*** ☐ TABLETOP ☐ FUNCTIONAL ☐ FULL SCALE

***Page 1 of 2 only**

FREQUENCY OF EXERCISE

☐ QUARTER ☐ 1ST ☐ 2ND ☐ 3RD ☐ 4TH

☐ ANNUAL DRILL ☐ SEMI-ANNUAL DRILL

PARTICIPANTS

COMPANY/AGENCY	CONTACT PERSON	TIME	PHONE

(IF MORE AGENCIES INVOLVED ATTACH LIST)

Explanation of Incident or Drill:

*SIGNATURE NOTIFICATION PREPARER:

DISTRIBUTION/RETENTION: LOCATION-5 YEARS

FORM 02-OPR-1638 REV. 01/05
Page 1 of 2

FIGURE A.1-3 - EMERGENCY RESPONSE OR DRILL, CONTINUED

Yes	No	NA	
☐	☐	☐	Notification – Were notification procedures followed and adequate?
☐	☐	☐	Safely Respond – Was the scene approached properly?
☐	☐	☐	Isolate and Deny Entry – Were zones, corridors, and evacuation routes used properly?
☐	☐	☐	Command – Was incident command established and used properly?
☐	☐	☐	Identification of Material – Was material identified in an appropriate time and manner?
☐	☐	☐	Assessment/Action Plan – Was written action plan developed and followed?
☐	☐	☐	Protective Equipment – Was PPE identified and used properly?
☐	☐	☐	Control – Were control techniques applied appropriately?
☐	☐	☐	Protective Actions – Were protective actions applied appropriately?
☐	☐	☐	Decontamination – Was decontamination conducted appropriately?
☐	☐	☐	Disposal – Waste material(s) disposed of properly?
☐	☐	☐	Termination – Was the incident terminated at the appropriate time and all de-briefed?
☐	☐	☐	Medical – Was medical and/or first aid available and used properly?
☐	☐	☐	Documentation – Was all documentation gathered?

If any boxes above were checked "no", provide an explanation and recommendations to correct deficiencies.
Have recommendations been implemented? ☐ Yes ☐ No If not, enter Action Items into the Action Item Tracking system. Date Entered:
Lessons Learned:
SIGNATURE, INCIDENT COMMANDER/PREPARER

DISTRIBUTION/RETENTION: LOCATION -5 YEARS
Copy to Facility Files

FORM 02-OPR-1638 REV. 01/05
Page 2 of 2

A.2 TRAINING PROGRAM

FIGURE A.2-1 provides training requirements for spill responders. **FIGURE A.2-2** provides the program matrix. Training documentation is maintained in the Facility operating record.

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 maintained in facility records
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 Removal instruction and 8 hours of actual field experience • Spill responders having potential exposure to hazardous substances at levels exceeding permissible exposure limits must have 40 hours of initial training offsite and 24 hours of actual field experience • On-site management/supervisors required to receive same training as equipment operators/general laborers plus 8 hours of specialized hazardous waste management training • Managers/employees require eight hours of annual refresher training
Spill management team personnel	• See recommended PREP Training Matrix (**FIGURE A.2-2**)
Training for casual laborers or volunteers	• Company will not use casual laborers/volunteers for operations requiring HAZWOPER training
Wildlife	• Only trained personnel approved by USFWS and appropriate state agency will be used to treat oiled wildlife
Training documentation and record maintenance	• Training activities records will be retained five years for all personnel following completion of training • Company will retain training records indefinitely for individuals assigned specific duties in the Plan • Training records will be retained electronically; Supervisor/Area Manager or the training coordinator will document all applicable training

FIGURE A.2-2 - PREP TRAINING PROGRAM MATRIX

TRAINING ELEMENT	QUALIFIED INDIVIDUAL (QI)	SPILL MANAGEMENT TEAM (SMT)	FACILITY PERSONNEL
Captain of the Port (COTP) Zones or Environmental Protection Agency (EPA) Regions in which the facility is located	X	X	X
Notification procedures and requirements for facility owners or operators; internal response organizations; federal and state agencies; and contracted oil spill removal organizations (OSROs) and the information required for those organizations	X	X	X
Communication system used for the notifications	X	X	X
Information on the products stored, used, or transferred by the facility, including familiarity with the material safety data sheets (MSDS), special handling procedures, health and safety hazards, spill and fire fighting procedures	X	X	X
Procedures the facility personnel may use to mitigate or prevent any discharge or a substantial threat of a discharge of oil resulting from facility operational activities associated with internal or external cargo transfers, storage, or use	X		
Facility personnel responsibilities and procedures for use of facility equipment which may be available to mitigate or prevent an oil discharge	X	X	
Operational capabilities of the contracted OSRO's to respond to small, medium, and large discharges	X	X	
Responsibilities and authority of the Qualified Individual (QI) as described in the Spill Response Plan and Company response organization	X	X	
The organization structure that will be used to manage the response actions including: • Command and control • Public information • Safety • Liaison with government agencies • Spill response operations • Planning • Logistics support • Finance	X	X	X
The responsibilities and duties of each spill management team (SMT) within the organization structure	X	X	
The drill and exercise program to meet federal and state regulations as required under Oil Pollution Act of 1990 (OPA 90)	X	X	
The role of the QI in the post discharge review of the Plan to evaluate and validate its effectiveness	X		

APPENDIX B - CONTRACTOR RESPONSE EQUIPMENT

TRAINING ELEMENT	QUALIFIED INDIVIDUAL (QI)	SPILL MANAGEMENT TEAM (SMT)	FACILITY PERSONNEL
The Integrated Contingency Plan (ICP) for the area in which the facility is located	X	X	
The National Contingency Plan (NCP)	X	X	
Roles and responsibilities of federal and state agencies in pollution response	X	X	
Available response resources identified in the Plan	X	X	
Contracting and ordering procedures to acquire OSRO resources identified in the Plan	X		
OSHA requirements for worker health and safety (29CFR 1910.120)	X	X	X
Incident Command System/Unified Command System	X	X	
Public affairs	X	X	
Crisis management	X	X	
Procedures for obtaining approval for dispersant use or in-situ burning of the spill	X		
Oil spill trajectory analyses	X	X	
Sensitive biological areas	X	X	
This training procedure as described in the Plan for members of the SMT	X	X	
Procedures for the post discharge review of the plan to evaluate and validate it effectiveness	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	X	
Hazard recognition and evaluation	X	X	
Site safety and security procedures	X	X	
Personnel management, as applicable to designated job responsibilities	X	X	
Procedures for directing the deployment and use of spill response equipment, as applicable to designated job responsibilities	X	X	
Specific procedures to shut down effected operations	X	X	X

TRAINING ELEMENT	QUALIFIED INDIVIDUAL (QI)	SPILL MANAGEMENT TEAM (SMT)	FACILITY PERSONNEL
Procedures to follow in the event of discharge, potential discharge, or emergency involving the following equipment or scenarios: • Tank overfill • Tank rupture • Piping or pipeline rupture • Piping or pipeline leak, both under pressure or not under pressure, if applicable • Explosion or fire • Equipment failure • Failure of secondary containment system	X	X	X
QI's name and how to contact him or her	X	X	X

Appendix B

APPENDIX B
CONTRACTOR RESPONSE EQUIPMENT

B.1 Cooperatives and Contractors

B.1.1 OSRO Classification

Figure B.1-1 - Evidence of Contracts

B.1 COOPERATIVES AND CONTRACTORS

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

B.1.1 OSRO Classification

The OSRO classification process was developed by the U.S. Coast Guard (USCG) to provide guidelines to enable USCG and plan preparers to evaluate an OSRO's potential to respond to oil spills. Plan holders that utilize USCG classification 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 on the pipeline for facilities listed in this Plan.

OSRO	USCG CLASSIFICATIONS
Haz-Mat Response Inc. 8225 Maple St. Wichita, KS 67209	St. Louis COTP Zone: Rivers – Levels MM, W1, W2, W3; Inland – Levels MM, W1, W2
Haz-Mat Response Inc. 1203 S. Parker St. Olathe, KS 66061	St. Louis COTP Zone: Rivers – Levels MM, W1, W2, W3; Inland – Levels MM, W1, W2

FIGURE B.1-1 provides evidence of contracts with OSROs. **FIGURE 7.1-1** provides local response contractor's equipment lists and response times.

FIGURE B.1-1 - EVIDENCE OF CONTRACTS

- Haz-Mat Response, Inc.

Haz-Mat Response Inc.

Orban, Cathy

'om: Brad Becker [beckerbrad898@gmail.com]
Sent: Wednesday, February 24, 2010 4:12 PM
To: Orban, Cathy
Subject: FW: OSRO Information
Attachments: 2009 Prep Letter.doc; 2009Incident List.doc; Equipment List Revised April 2009.xls

---

From: Orban, Cathy [mailto:Cathy.Orban@Williams.com]
Sent: Wednesday, February 24, 2010 3:59 PM
To: Brad Becker
Cc: jstockdale@haz-matresponse.com; rmcrae@haz-matresponse.com; TmcFarren@haz-matresponse.com; McCartney, Joe; Heinrichs, Randy
Subject: RE: OSRO Information

Hi Brad, I am looking for your company's "Annual Exercise Statement" for documentation in our Facility Response Plan. We have Haz-Mat Response listed in our plan as the OSRO contractor. Also, I would like to coordinate having you or someone from your office attend our next "table top drill" which is normally held in May or June.

Please let me know if you are not the proper contact to provide this information and please call Joe McCartney at 620-834-2153 to make arrangements to join our table top exercise. Thanks, c

Catherine Orban
ffice: 918.573.1535
Cell: 918.630.5067
cathy.orban@williams.com

From: Brad Becker [mailto:bbecker@haz-matresponse.com]
Sent: Thursday, November 05, 2009 12:05 PM
To: Orban, Cathy
Subject: FW: OSRO Information

Cathy--
Please contact me if you need additional information... Brad

From: Brad Becker [mailto:bbecker@haz-matresponse.com]
Sent: Tuesday, September 22, 2009 8:53 AM
To: 'Cathy.Orban@Williams.com'
Cc: 'Jack Stockdale (jstockdale@haz-matresponse.com)'; 'Robert McRae'; 'Troy McFarren'
Subject: OSRO Information

Cathy –

Thank you for requesting our OSRO – OPA 90 information.

Please find attached the 2008 Prep List, equipment list and insurance information. HMRI updates the OSRO information each December.

Haz-Mat Response office locations are:

- Olathe, KS
- Wichita, KS

- Great Bend, KS
- North Platte, NE

.ıe HMRI Great Bend and Wichita offices are the closest to Conway, KS. Mobilization time to Conway from these two offices range from one to two hours.

If you have any questions ... please contact me or Troy McFarren (cell – 620 793-4828) at the Great Bend Office.

Thanks -- Brad

ANNUAL EXERCISE STATEMENT

DECEMBER 7, 2009

2009 PREP STATEMENT

To whom it may concern,

HAZ-MAT RESPONSE, INC. has fulfilled the annual deployment and exercise requirements, under OPA 90 PREP Guidelines.

During 2009, HAZ-MAT RESPONSE, INC.:

- Exercised a representative amount of each type of boom
- Exercised recovery equipment
- Exercised and trained personnel in oil spill recovery techniques.

HAZ-MAT RESPONSE, INC. fulfilled the requirements with spill response and exercises.

Please direct any questions concerning OPA 90, OSRO and HAZ-MAT RESPONSE, INC. services to Robert McRae at **800-229-5252, ext. 273.**

Thank you,

Brad Becker
HMR, Inc.

Haz-Mat Response, Inc

OSRO # 0104

2009 PREP INCIDENTS

June – July 2009

Sedgwick County, Kansas – Haz-Mat Response personnel conducted containment boom deployment drills on the Little Arkansas River. The drills were repeated several times over two days. Deployment locations and recovery points were identified and cleared of obstructions. Crew sizes were frequently changed as specific scenario tasks were reassigned to the crew members in attendance. 150 to 200 feet of boom was used in each exercise (totaling 10 deployments). Single sets, double sets, deflection sets and multiple recovery locations were simulated. McRae, Simmons, Bradley, Jones, McFarren, Michael, Becker, Gremmel, Kerschen, Smith, King and Andre participated in the two days of training.

October 2009

Wyandotte County, Kansas -- Haz-Mat Response deployed 200 feet of containment boom in the Kansas River as a precautionary measure during a diesel fuel spill response. HMRI attached the boom to a bridge support and shore (at the potential recovery point). Vacuum trucks recovered released fuel and water from the affected storm sewer. Absorbent boom was positioned at the outlet to the river. Groceman, Waln, McRae, Beach, Frink, Wynn, Donovan and Chester participated in the response.

During 2009 Haz-Mat Response participated in several table top exercises for area power companies, pipeline companies and railroad fuel storage facilities.

HMR personnel also performed boom deployment training offerings at two different power companies. HMR prepared and presented didactic and practical training for both of the entities. Boom, owned and maintained by each of the customers, was used during the training. As an OSRO contactor, HMRI, would augment the initial response by supplying additional resources… including boats, containment boom, recovery vacuum trucks, temporary storage and personnel.

HAZ-MAT RESPONSE, INC.SM
1203 C South Parker Street
Olathe, KS 66061
Phone: (913) 782-5151
Toll Free: (800) 229-5252
Fax: (913) 782-6206

Equipment List

Remediation Equipment (Mobile)

	Total	Olathe	Wichita	North Platte	Great Bend
2000 # Carbon Filter - High Pressure	1	1			
Nilfisk/HEPA Decontamination Unit	2	2			
HEPA Vac	3	3			
Mercury Vac	2	2			
45' Office Trailer/River Trailer	1	1			
35' Office Trailer/River Trailer	1		1		
16' Response Truck	4	2	1	1	
125 GPM Air Stripper	1	1			
Sand Blasting Equipment	1	1			

Transportation

	Total	Olathe	Wichita	North Platte	Great Bend
3/4 Ton or Smaller	16	8	3	3	2
45' Equipment Trailer	5	5			
Lowboy Trailer	2	1		1	
1 ton 4x4	9	4	1	2	2
1 ton Stake Crew Cab	3	2		1	
End Dump	2	1		1	
Vac Truck (3,000 gallon) (70 Barrel)	5	3	1	1	
Boom Truck	1	1			
Semi Tractor	4	2		2	
Haz Roll-off (varies at each location)	25	21		3	1
Non-Haz Roll-off	4	2		1	1
Roll-off Truck (10 wheel)	2	1			1
Roll-off Trailer	2	1		1	
Guzzler Dry Vac	5	1		4	
Gator (4x4)	2	2			
One Ton w/lift	4	1	1	1	1
Hydro Jetter	1			1	
Guzzler Support Trailer	3	1		2	
Vacuum Box	2				
10,000 Gallon Mini Frac Tank (240 Barrel)	2				

Miscellaneous Tools and Equipment

	Total	Olathe	Wichita	North Platte	Great Bend
Portable Light Set	10	5	2	2	1
Portable Generator	11	6	2	2	1
Non-Sparking Tool Set	1	1			
Portable Oxy/Act. Unit	5	2	1	1	1
Ladder	15	6	2	6	1
55 Gallon Drum DOT	275	150	25	75	25
Leaf Blower	11	5	2	3	1
Wet/Dry Electric Vacuum	11	5	2	2	2
High Intensity Light Plant	5	2	1	1	1
185 cfm Air Compressor	4	2	1	1	
95 Gallon Poly Overpack	55	20	10	10	15
85 Gallon Steel Overpack	30	25		10	
55 Gallon Stainless Steel Drum	6	6			
Chain Saw	10	7	1	1	1
First Aid Kit	70				
Life Jacket	35	10	10	10	5
Retrieval Tripod System	4	2	1	1	
Intrinsically Safe Blower	5	3	1	1	
Intrinsically Safe Light	17	5	4	4	4
Betts Emergency Valve	2	1	1		
55 Gallon Poly	30	15	5	5	5
3000 PSI Hot Water Pressure Washer	7	2	1	3	1
1500 PSI Cold Water Pressure Washer	7	4	1	1	1

Construction Equipment

	Total	Olathe	Wichita	North Platte	Great Bend
Uniloader	4	2	1		1
Backhoe	2	1		1	
Fork Lift	2	2			
Boom Truck	1	1			
Portable Welder	1			1	
Drum Grabber	2	1	1		
Trackhoe (JD 30 - JD 60) mini	4	1	1	1	1
Trencher (uniloader mount)	1		1		
Sweeper (uniloader mount)	1	1			
Planer (uniloader mount)	1			1	
Toolcat	1			1	
Wheel Loader	1			1	
Excavator (JD 200)	1	1			

Oil Spill Equipment

	Total	Olathe	Wichita	North Platte	Great Bend
Oil Water Separator	2	2			
3000 Gallon Poly Tank	8	4	2		2
2000 Gallon Poly Tank	12	3	4	5	
Floating Oil Skimmer	5	2	2	0	1
Small ACME Skimmer	3	3			
18" River Boom	2700	1200	500	600	400
10" Containment Boom	1550	600	300	250	400
10" Fast Water Boom	400	200	200		
Absorbent Boom 8"x40' Bundle	110	60	10	30	10
Absorbent Pad Bundle	100	40	20	20	20
Particulate Absorbent Pallet	6	4		1	1
Wash-down Pump (floating)	5	3	1	1	
Large Drum Skimmer	3	1	1	1	
Small Drum Skimmer	3	1		1	1
Skim Pac	3	1	1	1	
River Trailer	3	1	1	1	
Work Boat 18' or less with Motor	5	2	1	1	1

Communications

	Total	Olathe	Wichita	North Platte	Great Bend
2 Way FM Hand Radio	49	18	10	18	3
Laptop with Wireless	14	6	3	3	2

Pumping Equipment

	Total	Olathe	Wichita	North Platte	Great Bend
Submersible Pump	10	6	1	2	1
2" SS Diaphragm Pump	2	2			
3" SS Diaphragm Pump	1	1			
2" Poly Diaphragm Pump	4	2		2	
1" Diaphragm Pump	4	3	1		
3" Diaphragm Pump	2	2			
2" Chemical Hose	520	250	150	120	
2" Hydrocarbon Hose	1350	1000	200	100	50
3" Hydrocarbon Hose	1200	1000	100	150	
3/4" PCB Pump	1				
2" Trash Pump	29	20	4	3	2
3" Trash Pump	7	4	1	1	1
3" Sludge Pump	1			1	
4" Trash Pump	2	2			
6" Dewatering Pump	1	1			

Chemical Response Equipment

	Total	Olathe	Wichita	North Platte	Great Bend
SCBA	32	16	6	6	4
Manifold Breathing System	5	2	1	1	1
Full Face Respirator	56	30	10	10	6
Level A Suit	24	12		6	6
Level B (Full Encapsulating)	60	30	10	10	10
Flash Suit	4	4			
Low Pressure - Transfer Trailer	1	1			
IDLH Trailer	1	1			
Response Trailer	4	1	1	1	1
Mercury Response Trailer	1	1			
Chlorine B Kit	1	1			
Chlorine C Kit	1	1			
Modified C Kit for N2O4	2	1		1	
Chlorine A Kit	1	1			
Magnetic Patch Kit	2	1		1	
Midland Kit	2	1		1	

Air Monitoring and Detection Equipment

	Total	Olathe	Wichita	North Platte	Great Bend
4-Gas with PID	3	2		1	0
Radiation Meter	2			2	
Dräger Color Metric Kit	5	2	1	1	1
Carbon Monoxide Gas Meter	2	2			
JEROME Mercury Detector	1	1			
4-Gas Dräger	8	4	2	1	1

Orban, Cathy

From: Brad Becker [bbecker@haz-matresponse.com]
Sent: Tuesday, September 22, 2009 8:53 AM
To: Orban, Cathy
Cc: 'Jack Stockdale'; 'Robert McRae'; 'Troy McFarren'
Subject: OSRO Information
Attachments: 2008 Incident List.doc; Equipment List Revised April 2009.xls; Insurance Cert 2009.pdf

Cathy –

Thank you for requesting our OSRO – OPA 90 information.

Please find attached the 2008 Prep List, equipment list and insurance information. HMRI updates the OSRO information each December.

Haz-Mat Response office locations are:

- Olathe, KS
- Wichita, KS
- Great Bend, KS
- North Platte, NE

The HMRI Great Bend and Wichita offices are the closest to Conway, KS. Mobilization time to Conway from these two offices range from one to two hours.

If you have any questions ... please contact me or Troy McFarren (cell – 620 793-4828) at the Great Bend Office.

Thanks -- Brad

ACORD CERTIFICATE OF LIABILITY INSURANCE

OP ID PJ
HAZMA-1

DATE (MM/DD/YYYY)

PRODUCER

Haake Companies
4650 College Blvd., Suite 300
Overland Park KS 66211
Phone: 913-491-1999 Fax: 913-906-0088

THIS CERTIFICATE IS ISSUED AS A MATTER OF INFORMATION ONLY AND CONFERS NO RIGHTS UPON THE CERTIFICATE HOLDER. THIS CERTIFICATE DOES NOT AMEND, EXTEND OR ALTER THE COVERAGE AFFORDED BY THE POLICIES BELOW.

INSURED

Haz-mat, Response, Inc
1203 C South Parker
Olathe KS 66061

INSURERS AFFORDING COVERAGE		NAIC #
INSURER A	American Int'l Specialty Lines	
INSURER B	Commerce & Industry Ins Co	19410
INSURER C	Massachusetts Bay Insurance Co	
INSURER D		
INSURER E		

COVERAGES

THE POLICIES OF INSURANCE LISTED BELOW HAVE BEEN ISSUED TO THE INSURED NAMED ABOVE FOR THE POLICY PERIOD INDICATED. NOTWITHSTANDING ANY REQUIREMENT, TERM OR CONDITION OF ANY CONTRACT OR OTHER DOCUMENT WITH RESPECT TO WHICH THIS CERTIFICATE MAY BE ISSUED OR MAY PERTAIN, THE INSURANCE AFFORDED BY THE POLICIES DESCRIBED HEREIN IS SUBJECT TO ALL THE TERMS, EXCLUSIONS AND CONDITIONS OF SUCH POLICIES. AGGREGATE LIMITS SHOWN MAY HAVE BEEN REDUCED BY PAID CLAIMS.

INSR LTR	ADD'L INSRD	TYPE OF INSURANCE	POLICY NUMBER	POLICY EFFECTIVE DATE (MM/DD/YY)	POLICY EXPIRATION DATE (MM/DD/YY)	LIMITS	
A		GENERAL LIABILITY X COMMERCIAL GENERAL LIABILITY [ ] CLAIMS MADE [X] OCCUR X POLLUT-CLMS MADE GEN'L AGGREGATE LIMIT APPLIES PER [ ] POLICY [X] PRO-JECT [ ] LOC	PROP1958555	12/18/08	12/18/09	EACH OCCURRENCE DAMAGE TO RENTED PREMISES (Ea occurence) MED EXP (Any one person) PERSONAL & ADV INJURY GENERAL AGGREGATE PRODUCTS - COMP/OP AGG	$ 1,000,000 $ 100,000 $ 10,000 $ 1,000,000 $ 1,000,000 $ 1,000,000
B B B		AUTOMOBILE LIABILITY ANY AUTO ALL OWNED AUTOS X SCHEDULED AUTOS X HIRED AUTOS X NON-OWNED AUTOS	CA7788013	12/18/08	12/18/09	COMBINED SINGLE LIMIT (Ea accident) BODILY INJURY (Per person) BODILY INJURY (Per accident) PROPERTY DAMAGE (Per accident)	$ 1,000,000 $ $ $
		GARAGE LIABILITY ANY AUTO				AUTO ONLY - EA ACCIDENT OTHER THAN AUTO ONLY EA ACC AGG	$ $ $
A		EXCESS/UMBRELLA LIABILITY X OCCUR [X] CLAIMS MADE DEDUCTIBLE X RETENTION $ 10,000	PROU1958556	12/18/08	12/18/09	EACH OCCURRENCE AGGREGATE	$ 9,000,000 $ 9,000,000 $ $ $
B		WORKERS COMPENSATION AND EMPLOYERS' LIABILITY ANY PROPRIETOR/PARTNER/EXECUTIVE OFFICER/MEMBER EXCLUDED? If yes, describe under SPECIAL PROVISIONS below	WC3083288	12/18/08	12/18/09	X WC STATU-TORY LIMITS OTH-ER E.L. EACH ACCIDENT E.L. DISEASE - EA EMPLOYEE E.L. DISEASE - POLICY LIMIT	 $ 1,000,000 $ 1,000,000 $ 1,000,000
C		OTHER AUTO- SCHEDULED	ADT4534100	12/18/08	12/18/09		1,000,000

DESCRIPTION OF OPERATIONS / LOCATIONS / VEHICLES / EXCLUSIONS ADDED BY ENDORSEMENT / SPECIAL PROVISIONS

CERTIFICATE HOLDER

CANCELLATION

SHOULD ANY OF THE ABOVE DESCRIBED POLICIES BE CANCELLED BEFORE THE EXPIRATION DATE THEREOF, THE ISSUING INSURER WILL ENDEAVOR TO MAIL 10 DAYS WRITTEN NOTICE TO THE CERTIFICATE HOLDER NAMED TO THE LEFT, BUT FAILURE TO DO SO SHALL IMPOSE NO OBLIGATION OR LIABILITY OF ANY KIND UPON THE INSURER, ITS AGENTS OR REPRESENTATIVES.

AUTHORIZED REPRESENTATIVE

Martin Haake

ACORD 25 (2001/08)

Haz-Mat Response, Inc

OSRO # 0104

2008 PREP INCIDENTS

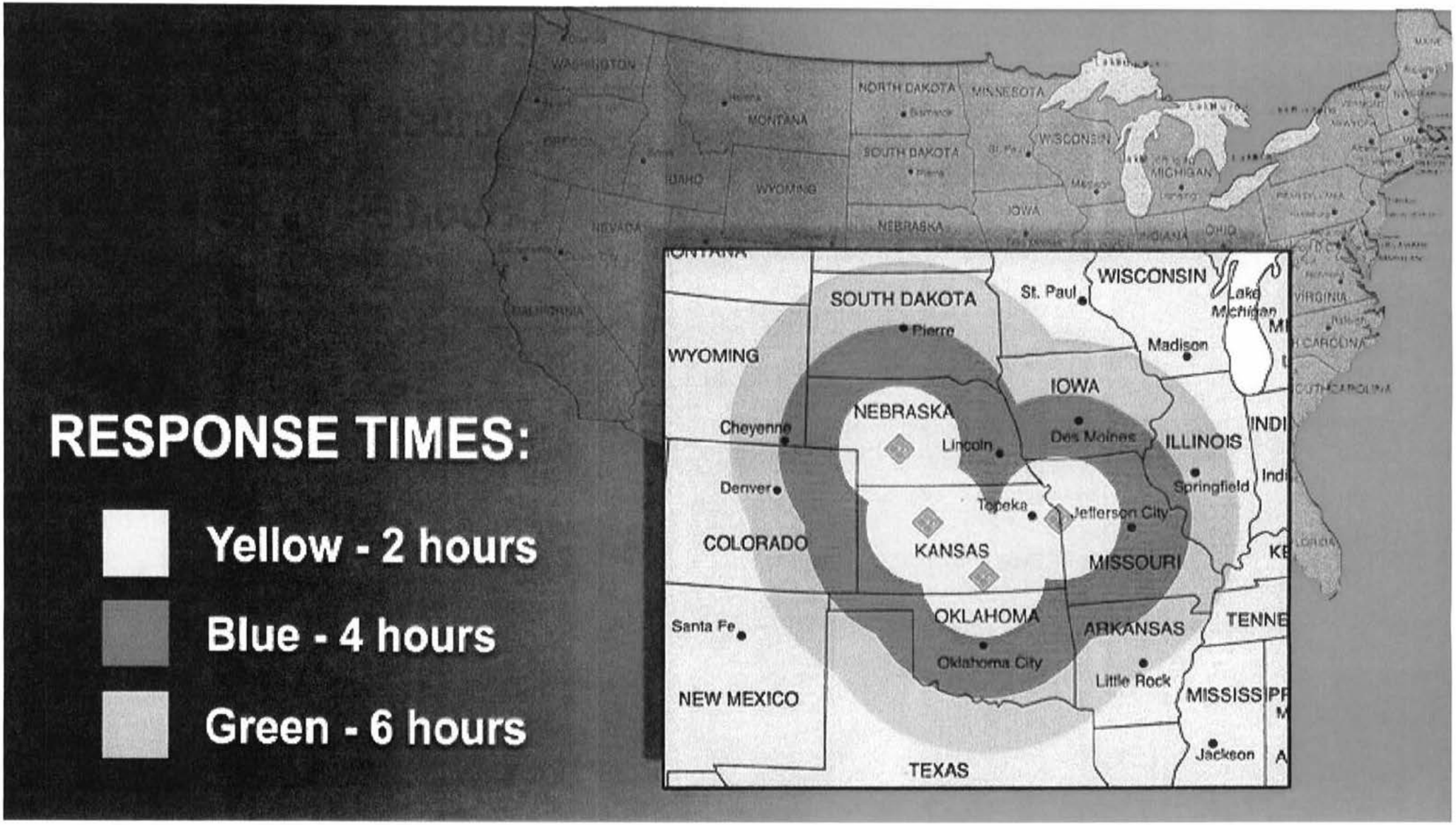
JUNE thru AUGUST 2008
Kansas City Area –HMRI conducted training (including deployment exercises) with an area power company. Six classes were conducted with each class deploying 150' to 250' of HMRI containment boom. The power company personnel assisted with the deployments and scenario activities. Command and control, task assignments, initial response assessment, Facility integration, product recovery, temporary storage, confinement, surface and subsurface impact and migration route identification topics were structured into the class. Becker, Michael, Horne and Anzicek (HMR) participated at the drills.

APRIL 2008
Des Moines, Iowa – HMR conducted a boom exercise with an area power company. HMR crews deployed boom in the Des Moines River… two sets were positioned with the HMR boat and shore crew. 100 feet was set (shore and anchor), simulating a recovery point. 100 feet was placed shore to shore to simulate protection for the community water intake. Becker, Kang, Erickson, Duncan, Jones, Rammelsburg and Michael participated in the exercise.

APRIL 2008
Waterloo, Iowa – HMR conducted a boom exercise with an area power company. HMR crews deployed containment boom in Blackhawk Creek simulating a recovery point location. The tier method of deployment was used to position 200 feet of HMR containment boom. HR crews work from the banks of Blackhawk Creek to facilitate the deployment. Becker, Lang, Erickson, Duncan,, Jones, Rammelsburg and Michael participated.

OCTOBER 2008
Russell County Kansas – HMR positioned 500 feet of containment boom (shore to shore) to isolate the marina cove in Wilson Reservoir. The local marina was heavily damaged by fire and the boom was positioned to contain any hydrocarbons that might have been released during the incident. The boom remained in place for two weeks. McFarren, Jones, Kettler, Simmons ,Chester and Bradley participated..

During 2008 Haz-Mat Response participated in several table top exercises for area power companies, pipeline companies and railroad fuel storage facilities.


RESPONSE TIMES:
Yellow - 2 hours
Blue - 4 hours
Green - 6 hours
SOUTH DAKOTA
Pierre
WISCONSIN
St. Paul
Madison
Lake Michigan
WYOMING
IOWA
NEBRASKA
Cheyenne
Lincoln
Des Moines
ILLINOIS
Springfield
Denver
Topeka
Jefferson City
COLORADO
KANSAS
MISSOURI
OKLAHOMA
ARKANSAS
Santa Fe
Oklahoma City
Little Rock
NEW MEXICO
Jackson
TEXAS

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Haz-Mat Response, Inc. provides direct response from offices located in Kansas and Nebraska, as well as management of your emergency incidents throughout the United States through the **Haz-Mat One®** 24/7 nationwide response network.

Direct response is provided from offices located at:

- Olathe, Kansas
- Wichita, Kansas
- Great Bend, Kansas
- North Platte, Nebraska

The **Haz-Mat One®** network includes more than 200 qualified contractors available nationwide for response to your emergency situations. This network provides "Worry-Free Service" that your colleagues have come to expect and rely upon.

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1203 S. Parker Olathe, KS 66061 Fax: (913) 782-6206
For more information, contact Haz-Mat Response, Inc. at hazmat@haz-matresponse.com.
To send your questions or comments about the site, contact the webmaster.

HAZ-MAT Companies

Emergency Response • Disposal • Industrial Services • Training

July 18, 2003

Catherine R. Orban
One Williams Center
Maildrop WRC3-9
Tulsa, OK 74172

RE: Master Service Agreement No: 03ENVI007

Dear Ms. Orban:

Enclosed you will find the signed and executed agreement including the following information.

- Our Current Rate Sheets
- OSRO/OPA-90 information
- Certificate of Insurance

If any questions arise as you review this information or you would like to schedule an appointment to learn more about our services, please feel free to call me at **1-800-229-5252 ext. 243.**

We look forward to assisting you with your environmental needs in the future.

Sincerely,

Jeff Donovan
Account Executive

MASTER SERVICES AGREEMENT
NO. 03ENVI007

MASTER SERVICES AGREEMENT

THIS MASTER SERVICES AGREEMENT ("Master Agreement") is entered into to be effective as of **July 11, 2003**, between **HAZ-MAT Response, Inc.**, a[n] KANSAS ("Contractor"), and **Williams Field Services Company**, sometimes referred to collectively as "Parties" or singularly as "Party".

1. DEFINITIONS

1.1 **"Applicable Law"** shall mean any and all laws, regulations, rules, ordinances, codes, orders and decrees of Governmental Authority affecting this Master Agreement, the applicable Request For Services or the Work.

1.2 **"Authorized Change Order"** shall have the meaning set forth in Section 16 of this Master Agreement.

1.3 **"Claims"** shall mean all causes of action, claims, damages, demands, liability, losses and suits of every type and character, including the expenses of litigation, court costs and reasonable attorney fees.

1.4 **"Company"** shall mean the Williams' Affiliate that enters into the Request For Services with Contractor.

1.5 **"Company Policy or Policies"** shall mean any and all policies, rules and/or procedures established by Company pertaining to the Work.

1.6 **"Default"** shall have the meaning set forth in Section 28 of this Master Agreement.

1.7 **"Final Acceptance"** shall mean Company's written acknowledgement that the Work is complete and that all other terms and conditions of this Master Agreement and the applicable Request For Services have been satisfied.

1.8 **"Governmental Authority"** shall mean any and all local, state, federal or tribal authorities having jurisdiction over this Master Agreement, the applicable Request For Services or the Work.

1.9 **"Mobilization"** shall mean Contractor's movement of equipment, materials, incidentals, and/or labor necessary for the Work towards the site where Work will be performed provided that such site shall not include Contractor's property.

1.10 **"Request For Services"** shall mean the signed written agreement(s) between Company and Contractor entered into pursuant to this Master Agreement which sets forth the scope of Work, compensation, commencement and completion date for Work, insurance and any other provisions agreed to by Company and Contractor.

1.11 **"Stand By"** shall mean any time period after Contractor has Mobilized with Company's permission and Company delays commencement of the Work. As used in this Agreement, Stand By shall have no other meaning.

1.12 **"Williams' Affiliates"** shall mean any subsidiaries, direct or indirect, current and future of The Williams Companies, Inc., a Delaware corporation, or any other entities which are under the control of The Williams Companies, Inc., or any one of its divisions or direct or indirect subsidiaries. The term "control" as used herein shall mean possession, directly or indirectly, of the power to direct or cause the direction of the management or policies of an entity whether through ownership of securities, by contract or otherwise.

1.13 **"Work"** shall mean the labor and/or goods to be provided by Contractor pursuant to the applicable Request For Services.

2. MASTER AGREEMENT. The Parties are entering into this Master Agreement because the Williams' Affiliates may, from time to time and in their separate capacities, enter into one or more Request For Services with Contractor. In order to timely facilitate the efficient administration and documentation of the anticipated Request For Services, the Parties desire to agree in advance in this Master Agreement to certain terms and conditions which will be applicable to such Request For Services if and when executed. It is understood and agreed that **Williams Field Services Company** does not guarantee that any Request For Services will be executed. However, once a Request For Services is executed by a Williams' Affiliate and Contractor, then such Williams' Affiliate and Contractor shall be obligated to comply with the provisions of the applicable Request For Services and this Master Agreement.

3. SEPARATE OBLIGATIONS. Each Request For Services creates a separate contract between Contractor and the Williams' Affiliate that signs the Request For Services (referred to hereinafter as "Company"). In no event shall any Williams' Affiliate, other than Company, be liable for the obligations arising under such Request For Services.

4. SCOPE OF WORK. The scope of Work shall be described in the applicable Request For Services.

5. COMPANY FURNISHED ITEMS. Except as otherwise expressly provided in the applicable Request For Services, Contractor shall furnish all labor, tools, material, supplies, equipment and transportation necessary to perform the Work.

6. COMPENSATION. Company agrees to pay Contractor and Contractor agrees to accept as full and complete compensation for the Work the compensation set forth in the attached Exhibit "A" or the amount set forth in the applicable Request For Services.

(i) Any Work to be furnished on a time-and-materials basis shall be furnished at the rates set forth in Exhibit "A".

(ii) No overtime or premium rates will be authorized or paid by Contractor unless Company has expressly approved such rates in writing; provided, however, that such persons expressly designated by Company in writing may give oral approval to spot overtime work.

(iii) No rate change or cost change will be effective until accepted by Company in writing. For Work furnished on a time-and-materials basis, Contractor must give thirty (30) days prior written notice of any proposed rate change. No rate change accepted by Company will apply to Work in progress at the time of notice unless Company expressly agrees otherwise in writing.

7. **INVOICING.** Contractor shall invoice Company in monthly periods or as specified in the invoicing instructions in the applicable Request For Services. All of Contractor's invoices shall be:

(i) directed to the address specified on the applicable Request For Services;

(ii) referenced with the applicable Request For Services numbers, time vouchers, account codes and Work order numbers;

(iii) accompanied by all supporting documentation or as required under the applicable Request For Services; and

(iv) marked either "Partial" or "Final". Contractor's "Final" invoice must be accompanied by a waiver of all lien rights from Contractor and a waiver of lien rights from each of its subcontractors performing the Work. Such waiver(s) must be in a form provided by Company.

8. **PAYMENT.** Provided Contractor is not in Default and subject to Section 9, Company shall make payment to Contractor by check for Work performed within thirty (30) days following Company's receipt of Contractor's invoice submitted in compliance with Section 6. No payment is Final Acceptance nor is it a waiver by Company of any of its rights under this Master Agreement or the applicable Request For Services.

9. **RETAINAGE OR BONDING.** ***Company may, at its option, retain ten percent (10%) of the invoiced amounts due Contractor until Final Acceptance. Additionally, Company shall have the right to request that Contractor obtain a payment and/or performance bond.*** At Company's request, Contractor shall obtain a performance, and/or payment bond in the amount of one-hundred percent (100%) of the applicable contract price. The surety company must be listed on current U.S. Treasury lists in an amount equal to or greater than the compensation amount as set forth in Section 6. Company will reimburse the actual cost of such required bonds, the amount not to exceed two percent (2%) of the applicable Request For Services Compensation. Contractor shall deliver its bond within ten (10) days of the execution of the applicable Request For Services.

10. **NOTICES.** All notices shall be directed to the address set forth in the applicable Request For Services.

11. **INSURANCE.** Contractor shall obtain and maintain throughout its performance of the Work, at its own expense and with insurance companies satisfactory to Company and authorized to do business in the state or states in which the Work is to be performed, insurance coverages of the types and limits set forth in the applicable Request For Services. Contractor shall furnish Company with satisfactory evidence of such insurance coverages prior to commencing the Work. If Applicable Law limits waiver of the right of subrogation or prohibits naming Company as an "Additional Insured", then the applicable Request For Services shall be deemed amended to comply with Applicable Law and to provide the waiver of subrogation or designation of Company as an Additional Insured to the maximum limit permitted by Applicable Law. If Contractor hires a subcontractor to perform any Work, then Contractor warrants that such subcontractor will also obtain and maintain throughout its performance of the Work insurance coverages meeting the requirements of this Section 11. If Contractor's insurance policy is terminated or expires during the course of Work, Company shall have the right to terminate the applicable Request For Services for cause and/or immediately suspend the Work.

12. **TERM.** The term of this Master Agreement shall extend for a period of one (1) year from the effective date and month-to-month thereafter until terminated by either Party giving at least thirty (30) days advance written notice to the other Party; provided, however, that the provisions hereof shall survive termination of this Master Agreement and continue to apply to any Request For Services entered into between Company and Contractor prior to the date of termination of this Master Agreement until such Request For Services is completed or terminated. Notwithstanding the foregoing, the indemnities, representations and warranties set forth in this Master Agreement and any Request For Services will survive termination and continue in effect.

13. **CONTRACTOR'S INVESTIGATIONS.** Contractor's acceptance of a Request For Services means that Contractor has fully investigated and incorporated into the compensation set forth in the applicable Request For Services: the conditions at and around the Work site; the reasonably foreseeable complications, hazards and risks incident to performing the Work; and the availability of labor, tools, material, supplies, equipment and transportation necessary to perform the Work.

14. **COMPANY'S INSPECTIONS.** Company shall have full access to the Work and may inspect the Work at any time. No inspection or failure to inspect by Company shall constitute a waiver of any of Company's rights or remedies or relieve Contractor of any of its obligations under this Master Agreement or any Request For Services.

15. **EXTRA WORK REQUEST(S).** Before furnishing any labor, material or equipment that Contractor does not believe to be included in the applicable Request For Services, Contractor shall complete and sign an extra Work request form supplied by Company and deliver it to Company. If Company concurs that the labor, material and/or equipment identified by Contractor is desirable and not included in the applicable Request For Services, then Company shall issue a proposed change order for such extra labor, material and/or equipment pursuant to Section 16. Company shall not be obligated to pay for any such extra labor, material and/or equipment unless and until it is furnished pursuant to an Authorized Change Order.

16. **AUTHORIZED CHANGE ORDER(S).** Company may, at any time, issue written notice to Contractor proposing change(s) to the applicable Request For Services. Within five (5) days after receipt of the proposed change order, Contractor shall incorporate therein in writing any proposed increase or decrease in the compensation and/or time required to perform the Work as changed and return it to Company. However, if Contractor is unable to assemble such information within five (5) days after receipt of the proposed change order, then Contractor shall give Company written notice explaining the delay and identify a reasonable date by which the proposed change order shall be returned to Company. If Contractor proposes an increase or decrease in the compensation and/or time for performance of the Work as changed, Company may either accept or reject such proposal or make a counter proposal. Neither the proposed change order nor any counter-proposed change order shall amend the applicable Request For Services until signed by both Company and Contractor ("Authorized Change Order"). Contractor shall continue to perform the Work in accordance with the applicable Request For Services until either amended by an Authorized Change Order or instructed to stop by Company in writing.

17. **AMENDMENTS.** No amendment to this Master Agreement shall be effective unless made in writing and signed by both Parties.

18. **INDEPENDENT CONTRACTOR.** Contractor shall be an independent contractor with respect to the performance of all Work, and neither Contractor nor anyone employed by Contractor shall be deemed for any purpose to be the employee, agent, servant, representative, or subcontractor of Company in the performance of any Work. Company shall have no direction or control of Contractor or its employees, agents, servants, representatives, or subcontractors except in the results to be obtained. The actual performance and

supervision of all Work shall be by Contractor, although Company shall have the right to inspect the Work to determine whether the Work is being performed in accordance with this Master Agreement and the applicable Request For Services.

19. **SUBCONTRACTORS.** Contractor shall identify all proposed subcontractors prior to the commencement of the Work. Contractor shall not contract with any subcontractor to perform the Work without the prior written consent of Company. Contractor shall be fully responsible to Company for the acts or omissions of its subcontractors, and of persons either directly or indirectly employed by them. No rights of administration reserved to Company shall be exercised directly on any subcontractor. Nothing contained in this Master Agreement, nor any approval of subcontractors, shall create any contractual liability or responsibility on the part of Company to any subcontractor.

20. **INDEMNITY. TO THE MAXIMUM EXTENT PERMITTED BY APPLICABLE LAW, COMPANY SHALL PROTECT, DEFEND, INDEMNIFY, AND HOLD HARMLESS CONTRACTOR FROM AND AGAINST ALL CLAIMS ARISING OUT OF OR RELATED IN ANY WAY TO THIS MASTER AGREEMENT OR THE APPLICABLE REQUEST FOR SERVICES TO THE EXTENT SUCH CLAIMS ARE ATTRIBUTABLE TO EITHER COMPANY'S FAILURE TO COMPLY WITH COMPANY'S OBLIGATIONS UNDER THIS MASTER AGREEMENT OR THE APPLICABLE REQUEST FOR SERVICES, COMPANY'S NEGLIGENCE OR THE NEGLIGENCE OF COMPANY'S EMPLOYEES.**

TO THE MAXIMUM EXTENT PERMITTED BY APPLICABLE LAW, CONTRACTOR SHALL, INDEMNIFY, DEFEND AND HOLD HARMLESS COMPANY FROM AND AGAINST ALL CLAIMS, WHETHER GROUNDLESS OR NOT, ARISING OUT OF OR RELATED IN ANY WAY TO THIS MASTER AGREEMENT OR THE APPLICABLE REQUEST FOR SERVICES TO THE EXTENT SUCH CLAIMS ARE ATTRIBUTABLE TO EITHER CONTRACTOR'S FAILURE TO COMPLY WITH CONTRACTOR'S OBLIGATIONS UNDER THIS MASTER AGREEMENT OR THE APPLICABLE REQUEST FOR SERVICES, CONTRACTOR'S NEGLIGENCE OR THE NEGLIGENCE OF CONTRACTOR'S EMPLOYEES, AGENTS, SUBCONTRACTORS OR OTHER REPRESENTATIVES. THIS INDEMNITY SHALL EXTEND TO COMPANY'S PARENT, SUBSIDIARIES AND AFFILIATES AND TO THEIR RESPECTIVE DIRECTORS, OFFICERS, EMPLOYEES AND REPRESENTATIVES.

21. **SAFETY AND THE ENVIRONMENT.** Contractor shall perform the Work in a safe and environmentally conscientious manner taking all reasonable and necessary precautions to prevent any spill, leak, discharge, or emission of or harmful exposure to any regulated or unregulated hazardous material, hazardous substance, oil, or other contaminant (pollution) and shall in every respect comply with all applicable Federal, state, city, county and any other applicable standards, laws, Company site specific work rules, statutes, or regulations regarding pollution, including reporting and record keeping requirements. Contractor, at its sole cost and expense, shall control, regulate and manage, as necessary, all regulated and unregulated hazardous materials, hazardous substances, oils and other contaminants relating to the performance of the work so as to prevent any harm whatsoever to any person, animal or property, including without limitation any associated or adjoining surface or ground water resources. Contractor shall keep the Work site and surrounding area free from waste and unnecessary material accumulations caused by Contractor's operations or actions of third parties.

Contractor shall provide Company with prior written notice of any hazardous materials proposed to be used by Contractor at a company site. Such hazardous materials usage is subject to Company's consent, which consent may not be unreasonably withheld. Contractor may not discharge or release hazardous materials to the environment at a Company site. In the event of any such discharge or release, Contractor

shall be solely responsible for the cessation, cleanup and disposal of all waste material or unused products arising from or related to the work as well as any damages, fines, penalties, other expenses, permits, or approvals necessary. However, upon the occurrence of any such pollution, Company shall have the right to designate any environmental cleanup operator of its own choosing to test and restore the project site or other impacted area to its pre-polluted condition at the cost of Contractor. Company may also take part to any degree it deems necessary in the cessation and cleanup of such pollution and approve ultimate disposition of any such materials generated by Contractor. In the event Contractor transports any regulated or unregulated hazardous material, hazardous substance, oil, or other contaminant off-site, title to such waste shall remain with Contractor. Contractor shall provide Company or its designee, with a copy of its written health and safety plans, and, if, requested, shall allow Company or its designee, to audit its records and procedures pertaining thereto. In addition, Company shall have the right to suspend performance of the Work for so long as it is necessary to prevent or stop any violations of such health, safety, and environmental procedures, rules, and regulations by Contractor, its employees, servants, agents, subcontractors, and licensees and to require the temporary or permanent removal from the Work site of any of Contractor's employees, servants, agents, contractors, subcontractors, or licensees, who violate such health, safety, or environmental procedures. Contractor shall not be entitled to compensation for any loss or damages suffered by Contractor nor to any time extension for completion of performance of the Work resulting from such suspension or termination.

22. LIENS. Provided Company is paying Contractor in accordance with this Master Agreement and the applicable Request For Services, Contractor shall pay when due all of its obligations incurred in the performance of the Work and keep Company's property free and clear of all liens and other encumbrances arising out of the performance of the Work. If Contractor should breach this Section 22, then, in addition to any other rights which Company may have against Contractor, Company may withhold payment from Contractor and satisfy such obligations and/or cause the release of such liens or other encumbrances.

23. WARRANTIES. Contractor expressly warrants that if any goods are supplied in connection with Work, such goods shall: (a) conform to the Contractor's affirmations and promises relating to the goods; (b) conform to the descriptions, samples and models furnished by Contractor; (c) conform to all Company specifications; (d) are new and of good material and workmanship and free from defects; (e) are fit for any ordinary or known particular purpose; and (f) are manufactured, procured and produced in compliance with all Applicable Law, rules, orders or regulations. Contractor warrants that any goods supplied in connection with the Work shall meet the warranties listed above for a period extending to the later of eighteen (18) months from the date the goods are delivered or twelve (12) months from the Final Acceptance. For goods which fail to meet this warranty obligation, Contractor agrees to repair or replace such goods at its expense. Contractor agrees that such repair or replacements will be done in a timely manner. For goods repaired or replaced, Contractor agrees that the warranty period for such goods will begin on the date of repair or replacement.

In addition, Contractor expressly warrants that any labor performed in connection with the Work shall be performed in accordance with the highest industry standards for similar labor. For services performed in connection with the Work, Contractor warrants that the services will meet the warranty listed above for period extending from eighteen (18) months from the performance of such services. For services which fail to meet this warranty obligation, Contractor agrees to reperform such services at its sole expense until the services meet the warranty above. Contractor agrees that such reperformance of services will be done in a timely manner. For reperformed services, Contractor agrees that the warranty period for such services will begin on the date of completion of the reperformance.

Contractor will be responsible for any and all damages resulting from its failure to meet its warranty obligations. If Contractor fails to repair or replace defects in services or goods in a timely manner, Contractor agrees that Company shall have the right to repair such defects at Contractor's expense or hire a third party to repair such defects at Contractor's expense.

If applicable, any provisions agreed to by Company and Contractor limiting Contractor's obligation to pay consequential, indirect, or special damages will not apply to limit Contractor's obligations to pay consequential damages if Contractor fails to meet its warranty obligations, including but not limited to, timely repair and replacement of defective goods or services. Finally, Contractor warrants that the Work will not be interrupted, delayed or prevented by date data functionality problems with facilities, hardware, equipment, material, systems or processes ("hardware and processes") of Contractor or its subcontractors and that the hardware and processes delivered by Contractor or its subcontractors in connection with the Work are date data functional. "Date data functional" means that hardware and processes, including any and all enhancements, upgrades, customizations, modifications, maintenance and the like, delivered by Contractor or its subcontractors or used in the Work, containing or calling on a calendar function, including, without limitation, any function providing specific dates or days, or calculating spans of dates or days, will record, store, process, provide, and where appropriate, insert true and accurate dates and calculations for dates and span of dates.

24. **PERMITS AND NOTICES.** Unless otherwise expressly provided in the applicable Request For Services, Contractor shall secure and pay for all permits, certificates and licenses and give all notices required to perform the Work by Applicable Law.

25. **TAXES.** The compensation generally referred to in Section 6 and specifically set forth in the applicable Request For Services includes all taxes that may be levied or assessed by any Governmental Authority against Contractor, any subcontractor, or Company (except sales taxes on any Company furnished items) in connection with or incident to the performance of the Work, and Contractor shall remit such taxes from the compensation so received. However, if requested by Company in writing, any such taxes shall be separately itemized in Contractor's invoices submitted pursuant to Section 7. Contractor shall reimburse Company on demand for any such taxes that Company pays, or Company may withhold payment from Contractor to reimburse Company for such taxes.

26. **DRUG AND ALCOHOL TESTING.** Contractors performing Work regulated by the Department of Transportation will comply with all testing provisions imposed by Applicable Law. Contractors performing Work that is not regulated by the Department of Transportation will comply with Company's Drug and Alcohol Testing Policy. All non-regulated testing performed by the Contractor shall comply with Applicable Law. The Contractor shall provide Company or designee, with a copy of its written drug and alcohol testing plan, and, if requested, shall allow the Company or designee, to audit its records and procedures pertaining thereto. Contractors whose subcontractors perform Work regulated by the Department of Transportation shall cause all such subcontractors to comply with all testing provisions imposed by Applicable Law. Contractor shall provide Company with a list of subcontractors performing Work regulated by the Department of Transportation prior to commencement of the Work.

27. **COMPLIANCE WITH APPLICABLE LAWS AND COMPANY POLICIES.** Contractor warrants that it is, and shall remain, familiar with Applicable Laws and shall comply and cause all its employees to comply with Applicable Law throughout the term of this Master Agreement and the applicable Request For Services. Contractor also warrants that it shall comply and cause all its employees to comply with any and all applicable Company Policies.

28. **TERMINATION FOR CAUSE.** Contractor shall be in Default if Contractor: (i) breaches any provision of this Master Agreement or the applicable Request For Services; (ii) makes an assignment for the benefit of creditors or consents to or acquiesces in the appointment of a receiver, liquidator, fiscal agent, or trustee; or (iii) becomes insolvent or enters into a voluntary or involuntary bankruptcy or receivership (singularly and collectively, a "Default"). In the event Contractor breaches any provision of this Master Services Agreement or the applicable Request For Services, Company shall give Contractor written notice of

the Default and a three (3) day opportunity to cure. If Contractor fails to cure the Default within such cure period, Company may, without prejudice to any other rights Company has at law or in equity: (i) terminate the applicable Request For Services; (ii) immediately take possession of the Work site(s) and all materials, equipment, tools, and machinery there and belonging to or paid for by Company; and (iii) either accept assignment of subcontracts, which the Contractor shall be obligated to make upon the written request of the Company, or finish the Work by whatever other method Company deems appropriate. To the extent that Company cannot recover its costs to complete the Work from monies due to Contractor, Company shall invoice Contractor therefor. Contractor shall pay the same to Company within twenty (20) days after the receipt of said invoice. If a court or arbitrator should determine that Company's alleged termination for cause was wrongful, then Company's termination shall be considered termination for convenience subject to Section 29.

29. **TERMINATION FOR CONVENIENCE.** Company, in its sole discretion, may terminate the applicable Request For Services without cause by providing written notice to Contractor. Upon receipt of such notice, Contractor shall comply with Company's directions for Work stoppage. In the event of such termination, Company shall pay the direct costs incurred by Contractor through the fifth business day after issuance of the written notice plus an additional ten percent (10%) of such costs for overhead and profit.

30. **ATTORNEY'S FEES.** If either Company or Contractor institutes suit to enforce any right or obligation against the other arising from this Master Agreement or the applicable Request For Services, the one to prevail shall be entitled to recover all expenses of litigation, attorney's fees, and court costs from the other.

31. **RIGHT TO AUDIT.** Company shall have the right to inspect and audit, at all reasonable times, Contractor's accounts and records pertaining to the Work for a period not to exceed twenty-four (24) months after the later of the date Contractor ceases performing the Work or Final Acceptance. In connection with all agreements with subcontractors, Contractor shall obtain a similar right to permit Company to inspect and audit the accounts and records of the subcontractor and require the subcontractor to include a similar provision in all agreements with its subcontractors.

32. **CONFIDENTIALITY.** Except as necessary to obtain the required insurance or bonding, Contractor shall maintain as confidential and proprietary all information provided by Company pursuant to this Master Agreement and any Request For Services and shall not divulge or disclose such information to third parties without the prior written consent of Company, shall not use such information to the detriment of Company, and shall return all such information upon completion of a Request For Services, as applicable, or otherwise upon termination or expiration of this Master Agreement.

33. **SEVERABILITY.** If any provision of this Master Agreement or the applicable Request For Services is partially or completely unenforceable pursuant to Applicable Law, then such provision shall be deemed amended to the extent necessary to make it enforceable, if possible. If not possible, then such provision shall be deemed deleted. If any provision is so deleted, then the remaining provisions shall remain in full force and effect.

34. **NO THIRD PARTY BENEFICIARY.** Nothing in this Master Agreement or any Request For Services is intended to provide legal rights to or create any liability for anyone not executing the applicable Request For Services.

35. **ASSIGNMENT.** Neither Party may assign its rights or delegate its obligations under this Master Agreement without the prior written consent of the other Party. Neither Company nor Contractor may assign its rights or delegate its obligations under the applicable Request For Services without the prior written consent of

the other. Notwithstanding the foregoing, Company may assign its rights under this Master Agreement or a Request for Services to a Williams' Affiliate without consent.

36. CONFLICT OF INTEREST. Contractor will not use any funds for illegal or otherwise "improper" purposes. Contractor will not pay any commissions, fees or rebates to any employee of Company, nor favor any employee of Company with gifts or entertainment of significant cost or value. If Company has reasonable cause to believe that one of the above provisions has been violated, Company, or its representative, may audit the records of Contractor for the purpose of establishing compliance with this Section.

37. PATENT, TRADE SECRET, AND OTHER INTELLECTUAL PROPERTY RIGHT INDEMNITY. Contractor agrees to save Company harmless from and indemnify Company against any and all Claims, and expenses of any kind in connection therewith, including reasonable attorney's fees and disbursements, based on alleged infringements of trademarks, copyrights, patent rights or of any kind of trade secret arising from the use of goods or services provided pursuant to this Agreement. If any such goods or services are held to constitute infringement or their use is enjoined, Contractor, if unable within a reasonable time to secure the right for Company to continue to use such goods or services, by suspension of the injunction, by procuring for Company a license or otherwise, will at the option of Company and at Contractor's own expense either replace such goods or services with non-infringing goods or services, or modify them so that the goods or services become non-infringing, or remove the infringing goods and stop the infringing services and refund all sums paid therefore. This indemnity shall survive acceptance of the goods and services and payment therefore.

38. MOBILIZATION. Contractor shall not Mobilize until directed by Company. Any mobilization prior to the Company's authorization shall be at Contractor's risk.

39. STAND BY. Any Stand By, as defined in Section 1.11 of this Master Agreement, shall entitle Contractor to payment of Stand By rates. Such rates shall be as specifically set forth in Exhibit "A" or the applicable Request For Services. If no Stand By rates for personnel are set forth in Exhibit "A" or the applicable Request For Services, then Contractor shall receive eighty-five percent (85%) of the applicable rate set forth in Exhibit "A" or the applicable Request For Services for any personnel Mobilized to the Work site with Company's permission and prevented from performing the Work due to the Stand By. If no Stand By rates for equipment are set forth in Exhibit "A" or the applicable Request For Services, then Contractor shall receive sixty percent (60%) of the applicable rate set forth in Exhibit "A" or the Applicable Request For Services for any equipment Mobilized to the Work site with Company's permission and prevented from performing Work due to the Stand By. This Section sets forth Contractor's sole right of recovery against Company for any Stand By. Such Stand By rates shall be deemed to include all wages, benefits, taxes, insurance, overhead, anticipated profit, and costs incident to the Stand By.

40. GOVERNING LAW AND INTERPRETATION. THE RIGHTS AND OBLIGATIONS ARISING UNDER THIS MASTER AGREEMENT AND THE APPLICABLE REQUEST FOR SERVICES SHALL BE GOVERNED AND CONSTRUED IN ACCORDANCE WITH THE LAWS OF THE STATE OF OKLAHOMA, WITHOUT GIVING EFFECT TO CHOICE OF LAW PRINCIPLES THEREOF. IN THE EVENT OF A CONFLICT BETWEEN THIS MASTER AGREEMENT AND THE APPLICABLE REQUEST FOR SERVICES, THIS MASTER AGREEMENT SHALL CONTROL UNLESS IT IS EXPRESSLY STATED THAT THE PARTICULAR CONFLICTING PROVISIONS OF THE APPLICABLE REQUEST FOR SERVICES SHALL CONTROL.

41. INVENTIONS AND CREATIONS. Contractor acknowledges that any and all inventions, discoveries, improvements, or creations which Contractor may conceive or make in the performance of this Agreement, whether individually or jointly with others, shall be the sole and exclusive property of Company.

Contractor agrees to execute any and all documents which may be deemed necessary by Company in its sole discretion to evidence such ownership, and further agrees to cooperate fully in the filing and/or prosecution of any patent application(s) related to such inventions, discoveries, improvements or creations. Contractor further agrees to make prompt written disclosure to Company of each such invention, discovery, improvement, or creation not otherwise clearly disclosed to Company, specifically pointing out features or concepts that Contractor believes to be new or different. Contractor agrees that all copyrightable works created in connection with the performance of this Agreement shall be the sole and exclusive property of Company. To the extent that such works are not deemed to be "works for hire," Contractor hereby assigns all proprietary interests, including copyrights, in those works to Company, without further compensation.

42. ENTIRE AGREEMENT. This Master Agreement contains the entire agreement of the Parties with respect to the matters addressed herein and shall only be amended pursuant to Section 17. The Parties covenant and agree that this Master Agreement shall be deemed for all purposes as prepared through the joint efforts of the Parties and shall not be construed against one Party or any Williams' Affiliate as a result of the preparation, submittal or other event or negotiation, drafting or execution.

43. CONFLICT PROVISIONS. It is understood and agreed that if there should be any conflict between the provisions of this Master Agreement or any related Request for Services, and any Contractor's order, invoice, statement, published rate schedule or any other type of memoranda or attachment, whether written or oral, between Company and Contractor, the provisions of this Master Agreement or any related Request for Services shall control.

HAZ-MAT Response, Inc.

By: John W. Stockdale

Name: John W. Stockdale

Title: President

Williams Field Services Company

By: Rob M. Hawes

Name: Rob M. Hawes

Title: Man. - EHS&T

EXHIBIT "A" TO THE
MASTER SERVICES AGREEMENT
BETWEEN HAZ-MAT Response, Inc.
AND Williams Field Services Company
DATED July 11, 2003

CONTRACTOR'S RATE SHEET

SEE ATTACHED

- Consumables
- ER RATES
- Scheduled Rates

[redacted]

J.D.

HAZ-MAT RESPONSE, INC.,sm

"YOUR FIRST LINE OF DEFENSE"®

Consumables Rate Sheet *
July 1st, 2003

CD#	Description	Price
	PPE	
C01	Latex under Gloves (Pair)	.35
C02	Nitrile Gloves (Pair)	2.50
C03	Gloves Neoprene (Pair)	2.50
C04	PVC Gloves (Pair)	10.00
C05	Silver over Gloves (Pair)	16.00
C06	Leather Gloves (Pair)	6.00
C07	Nitrile over Cotton Gloves (Pair)	6.00
C08	Tyvek Coverall with hood	8.00
C09	Saranex Coverall with hood (Each)	26.50
C10	Yellow Rain Suit (Each)	21.00
C11	PVC Acid Suit (Each)	65.00
C13	Fully Encapsulating level B (Each)	185.00
C14	Responder A (Each)	776.00
C15	NFPA Responder A & Flash (Each)	2000.00
C16	Tyvek Boot Covers	1.50
C17	Latex Boot Covers	6.00
C18	Boot, PVC	30.00
C19	Boot, Haz-Mat (Pair)	70.00
C20	Boot Liners	7.00
C21	Hard Hat	10.00
C22	Hard Hat Liners	5.00
C23	Safety Glasses	6.00
	Containers	
C30	9 Gallon poly pail	21.00
C31	Poly 5 Gallon Pail	15.00
C32	8 Gallon Steel Salvage Drum	50.00
C33	20 gallon Poly Drum	35.00
C34	30 Gallon PVC Lab pack Drum	90.00
C35	55 Gallon Drum, Bung	50.00
C36	55 Gallon Drum, Open Top	50.00
C37	55 Gallon PVC	65.00
C38	85 Gallon Steel Salvage Drum	150.00
C39	95 Gallon Poly Salvage Drum	250.00
C40	110 Gallon Poly Salvage Drum	285.00
C41	Large Haz Waste Disposal Box (Each)	72.00
C42	Large Haz Waste Disposal Box Liner (Each)	18.50

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WICHITA KANSAS CITY GREAT BEND

HAZ-MAT RESPONSE, INC.sm
1203C South Parker Street
Olathe, Kansas 66061
913-782-5151 800-229-5252
E-mail: hazmat@haz-matresponse.com Web site: www.haz-matresponse.com

CD#	Description	Price
	Absorbents	
C47	Clay absorbent per bag	10.00
C48	18 X 18 Absorbent Pad Universal – Bag	90.25
C49	18 X 18 Absorbent Pad Oil – Bag	85.25
C50	8" X 10" Booms, Bag of 4	182.00
C51	36" x 100' Pad, Roll, Universal – Roll	182.00
C52	36" X 150' Pad, Roll, Oil – Roll	223.00
C53	Oil Snare (pom poms') Case	180.00
C54	Absorbent Pillow, Oil only, Bag	70.00
C55	Pete Sorb (2 cu.ft. bag)	32.75
C56	Boom Skirt (100 foot)	182.00
	Respiratory Protection	
C60	Filter North Defender (Pair)	35.00
C61	Filter North Black (Pair), Organic Vapor	15.00
C62	Filter North Green (Pair), Ammonia	15.00
C63	Filter North Yellow (Pair), Organic Vapor / Acid gas	15.00
C64	Filter North Purple (Pair), HEPA	15.00
C65	Filter North White / Purple (Pair), Acid Gas / HEPA	25.00
C66	Filter North Yellow/Purple (Pair), Organic Vapor / Acid Gas / HEPA	25.00
C67	Filter North Mercury Vapor	35.00
C68	SCBA / Respirator Wipe (Per Box)	20.00
C69	SCBA Refill Each Bottle (30 Min)	8.50
C70	SCBA Refill Each Bottle (1 hr)	16.00
C71	Large SAR Air Cylinders (Each)	25.40
	Misc.	
C76	55 Gallon Drum Liners	5.50
C77	85 Gallon Drum Liners	6.25
C78	Plastic Sheeting 6 Mil 20 x 100	78.00
C79	Plastic Sheeting 10 Mil 20 x 100	168.00
C80	Duct Tape, Roll (Each)	4.00
C81	Caution Tape, Roll (Each)	18.00
C82	Haz / Non-Haz Labels	.50
C83	Mileage Per Mile (Scheduled)	.30
C84	Mileage Per Mile (Emergency)	.50
C85	Film & Processing (Roll)	25.00
C86	Communications (Crew of 1 to 5) Per Hour	30.00
C88	Communications (Crew over 5) Per Hour	40.00
C89	Plastic sheeting 6 mil 40 X 100	168.00
C90	Roll off Liner	50.00
C91	Dry vac hose (per foot)	1.25
	Screening	
C93	PPM Hand Pump (Tubes) Ammonia (Each)	6.50
C94	PPM Hand Pump (Tubes) Formaldehyde (Each)	6.50
C95	PPM Hand Pump (Tubes) Hydrogen Sulfide (Each)	6.50
C96	PPM Hand Pump (Tubes) Chlorine (Each)	6.50
C97	PPM Hand Pump (Tubes) All Others (Each)	7.50
C98	PPM Hand Pump (Tubes) Ethylene Oxide	15.00
C99	Ph Paper, Strip / Box	23.25
C100	PCB Screening Kit, Oil	19.00
C101	PCB Screening Kit, Soil	39.00
C102	Oil-N-Water Test Strip	1.00

	Description	Price
	Chemicals	
C109	Soda Ash (per #)	.50
C110	Lime (per #)	.50
C111	Petro Plug	20.00
C112	Epoxy Putty 1 ½ inch stick	2.50
C113	Chemical Classifier strips Each	15.00
C115	Capsur, PCB extraction liquid (per gallon)	50.00
C116	Mercury Absorbent (Merc Sorb) Each bottle	40.00
C117	Mercury Indicator	35.00
C118	Mercury Vapor Absorbent	18.00
C119	Simple Green (per gallon)	10.00
C120	Micro Blaze (per gallon)	35.00
C121	Micro Blaze Nutrient (per gallon)	20.00
C122	Mercury Vac Paper Filters	25.00
C123	Mercury Vac Complete Filter Change	250.00

* Any additional consumable items used will be billed at cost + 20%

HAZ-MAT RESPONSE, INC.sm

"YOUR FIRST LINE OF DEFENSE"®
Scheduled Service Rate Sheet

July 1st, 2003

LABOR

CD#	Title/Position	Standard Rate Per Hour	Over Time Rate Per Hour
SP1	Project Manager/Site Safety Officer	68.50	102.75
SP2	Project Specialist	54.00	81.00
SP3	Project Technician	42.00	63.00
SP4	Project Support Personnel	28.00	42.00
SP5	Senior Project Manager	100.00	150.00
SP6	Corporate Health And Safety	100.00	150.00

EQUIPMENT

CD#	Equipment Description	Rate
	Vehicles	
S01	Haz-Mat Vehicles (SUV, Automobiles)	9.50
S02	Response Vehicle (F-250)	20.00
S03	4 X 4 Truck	10.00
S04	One Ton Truck	15.00
S05	16 Foot Response Truck	72.50
S06	2 ½ Ton Stake Bed truck	16.00
S07	Winch Truck	52.50
S08	Boom Truck	60.00
S09	Semi Tractor	45.00
S10	End Dump Trailer with Tractor	65.00
S11	3000 Gallon Vac Truck (4 hr minimum)	85.00
S12	Lowboy Trailer with Tractor	60.00
S13	Roll off trailer with tractor	65.00
S14	6 X 4 Gator / Per Day	200.00
S15	10 wheel roll off truck	60.00
S16	Guzzler Dry Vac	140.00
S17	Guzzler Dry vac w/ Hi-rail gear	180.00
	Trailers	
S17	Small Spill Trailer	15.00
S18	Response Trailer (R-1 R-2 R-3 R-5)	57.50
S19	River Response Trailer 10 foot	28.00
S20	River Response Trailer 20 foot	50.00
S21	River Response Trailer 45 foot/ Office / Per Day	210.00
S22	45' Box Trailer / Per Day	65.00
S23	Utility Trailer	10.00
S24	Fuel Trailer	20.00
S25	Tank Cleaning Trailer	47.50
S26	Conex TM Soil Unit	100.00
S27	Air Stripper / Oil Water Separator Trailer	67.50
S29	Office trailer / Per day	200.00
S30	Decon Unit - Four Shower / Per day	200.00
S31	Drum Crusher / Per Day	200.00
S32	Oil Water Separator / Per Day	150.00

Emergency Response • Disposal • Industrial Services • Training

WICHITA KANSAS CITY GREAT BEND

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1203C South Parker Street
Olathe, Kansas 66061
913-782-5151 800-229-5252
E-mail: hazmat@haz-matresponse.com Web site: www.haz-matresponse.com

CD#	Equipment Description	Rate
	Heavy Equipment	
S35	Uniloader (Case 1845)	32.50
S37	Uniloader With Drum Gripper	45.50
S38	Track Hoe (John Deere 30)	35.00
S39	Rubber Tire Backhoe (Cat 416)	45.00
S40	Rubber Tire Backhoe (Cat 446)	65.00
S41	Excavator (Kobelco 909LC)	105.00
S42	Track Loader (Cat 963)	87.50
S43	Fork Lift	32.50
	Pumps	
S48	¾" Pacer Hand Pump	6.75
S49	¾" Oil / PCB pump	13.00
S50	1 ¼" and Smaller Double Diaphragm Pump	10.50
S51	Wash Down Pump	10.00
S52	2 INCH Dismass Hand Pump	6.00
S53	2" Stainless Steel Double Diaphragm Pump	30.00
S54	2" Aluminum Double Diaphragm	14.50
S55	2" Submersible Pump	9.50
S56	2" Pacer Chemical Pump 5 hp	18.50
S57	2" Trash pump	8.50
S58	3" Aluminum Double Diaphragm	19.50
S59	3" Single Diaphragm Sludge Pump	19.50
S61	3" Trash Pump	11.75
S62	2" Poly Double Diaphragm Pump	30.00
S63	2" Gear pump	15.00
	Portable Storage	
S66	Up to 1499 Gallon Poly Tank / Per Day	5.00
S67	1500 to 2000 Gallon poly Tank / Per Day	10.00
S69	3000 Gallon Poly Tank / Per Day	12.00
S70	5000 Gallon Poly Tank / Per Day	12.50
S73	21,000 Gallon Frac Tank / Per Day (3 DAY MINIMUM, "DISPOSAL EXCLUDED")	50.00
S74	Open Top Tank/ Per Day	40.00
S75	Non Haz Roll Off/ Per Day	15.00
S76	Haz Waste Roll Off / Per Day	25.00
S77	Vacuum Box / Per Day	50.00
	Lighting, Generators, Compressors, Pressure Washers	
S80	Portable Generator 5000 Watt	15.00
S83	Portable Light Stand	4.00
S84	Light Tower / Generator	20.00
S85	220 Portable Steam Boiler / Per Day	185.00
S86	3000# PSI Steam/Hot Water Washer	25.50
S89	185 CFM Air Compressor	27.00
S90	Hand Pump Sprayer	7.00

CD#	Equipment Description	Rate
	Vacuum Equipment	
S95	Mercury Vac System	75.00
S96	Nilfisk Decon Unit	50.00
S97	Wet/Dry Elec Hydro Vac System (55 gallon Tornado)	18.50
S98	Wet Dry Vac	10.00
S99	Hepavac System 20 Gallon	35.00
S100	Wet/Dry Air Hyrdo Vac System (55 gallon Tornado)	16.50
	Hand Tools	
S105	Chain Saw	10.00
S106	Concrete Cut Off Saw	15.00
S107	Electric Hand Tools	5.00
S108	Air Hand Tools	5.00
S109	Hand Compactor	7.50
S110	Jack Hammer	8.00
S111	Sandblaster (Abrasive not included)	15.00
S112	Power Broom	10.00
	Specialty Equipment	
S116	Non-Sparking Tool Kit / Per Day	18.00
S117	Chlorine "A" "B" or "C" Kit / Per Day	130.00
S118	Nomex Cover All / Per Person / Per Day	10.00
S119	Plug and Patch kit / Per Day	35.00
S120	Dome Clamps / Per Day	16.00
S121	Betts Emergency unloading Valve/ Per Day	200.00
S122	Ballistic Vest & Helmet/ Per Day / Per Person	185.00
S123	Model T Jr Foamer	16.25
S124	Bunker Gear / Per Person / Per Day	97.50
S125	Gauge Kit / Per Day	75.00
S126	"Goat" Street Sweeper	7.50
	Breathing Air Equipment	
S129	Air Purifying Respirator / Per Day / Per Person	20.00
S130	30 MINUTE SCBA's (Excluding Refills)	20.00
S131	1 HOUR SCBA's (Excluding Refills)	25.00
S132	Cascade Air System / Per Day / Per Person (Excluding Refills) SAR	60.00
S133	Powered Air Purifying Respirator / Per Day / Per Person	25.00
	Monitoring Equipment	
S138	Jerome Mercury Vapor Meter	48.75
S139	PPM Hand Pump	6.00
S140	4 Gas Meter	21.00
S141	3 Gas Meter	13.00
S144	Intrinsically Safe 2-Way Radio	10.50
S145	Intrinsically Safe Air Tools	20.00
S146	PH Meter	4.00
S147	Decimal Meter	9.50
S148	RAD Meter	17.50
S149	PID (Photo Ionization Detector)	25.00
S150	PPM Meter SO_2, H_2S, CO, Etc.	10.00
S151	Metal Detector	5.00
S152	Electric Thermometer	6.50
S153	Non Contact Thermometer	6.60
S154	RAD 493 Meter	15.00
S155	CMS Chip Meter	15.00

CD#	Equipment Description	Rate
	Confined Space Equipment	
S159	Body Harness (Rescue)	6.00
S160	Body Safety Harness	4.00
S161	Confined Entry Air Vent System	10.50
S162	C-S Tripod (Winch System)	42.00
S163	C-S Rescue Equipment Kit (Bag)	42.00
	River Spill Equipment	
S168	Life Vest / Per Day	5.00
S169	24 Foot Pontoon Boat	25.00
S170	16 Foot Work Boat with motor	16.00
S171	Boat with out Motor	10.75
S172	Oil Skimmer Acme (Small)	6.50
S173	River Boom 12" Fast Water Per Foot / Per Day	1.00
S174	Leaf Blower	10.00
S175	River Boom 18" / Per Foot / Per Day	1.75
S176	Mini Boom / Per Foot / Per Day	.50
S177	Floats 1 1/2" & 2" / Per day	1.00
S178	Boom Anchor System 25/50# / Per Day	6.00
S179	Boom Tow Bridge / Per day	6.00
S180	Boom Ringer / Recovery Tank	20.00
S181	Oil Skimmer High Capacity	15.00
	Misc.	
S186	Propane Heater	10.00
S187	Portable Heater 85,000 BTU	10.00
S188	Portable Heater 100,000 BTU	12.00
S189	Portable Heater 150,000 BTU	15.00
S190	Portable Heater 320,000 BTU	20.00
S191	Digital Camera / Per Day	15.00
S192	Lap Top Computer	10.00
S193	VHS Video Recorder	10.00
S194	2" Chemical Hose Per Foot / Per Day	.90
S195	Suction Hose Per Foot / Per Day	.75
S196	Discharge Hose Per Foot / Per Day	.75
S197	Air Hose ¾" Per Foot / Per Day	.25
S198	Traffic Arrow Board	14.00
S199	Traffic Barricades	3.00
S200	Bag Filter Unit	6.00
S201	4 Pack Bag Filter Unit (SS)	24.00
S202	6 Pack Bag Filter Unit	35.00
S204	2000 LB High Capacity Activated Carbon Filter (Recharge Fee Will Apply)	49.75
S205	800 LB Activated Carbon Filter (Recharge Fee Will Apply)	35.00
S206	GPS Unit / Per Day	15.00

- All rates are hourly unless noted differently.
- Emergency Response Rates are subject to a 4-hour minimum.
- Overtime will be charged for work performed before 0800 and after 1700hrs and for work over 8 hours in a day, over 40 hours in a week, and weekends.

- Holidays will be charged as double time. New Years Day, Easter Day, Memorial Day, 4th of July, Labor Day, Thanksgiving Day, Christmas Day
- A per diem of $105.00 per person per day will apply for out of town and overnight stays.
- IDLH & Levels A & B carry a surcharge of $10.00 per person / per hour.
- Mobilization of required heavy equipment will apply as required.
- Any response involving materials that are potential for detonation will reflect a double the stated rate billing.
- Any rented equipment for jobs will be furnished at cost +20%
- Jobs lasting more than 24 hours will be charged at the Emergency Rates for the first 24 hours and then at the Scheduled Rates for hours thereafter (Contract Customers Only).
- Containment boom cleaning and repair will be billed at cost +20%
- Subcontractors will be billed at cost + 20%
- All Emergency Response jobs are billed portal-to-portal.
- Roll off box delivery is dependent on location. The cost of roll off liners is $50.00 each, liners are not mandatory, but if the box requires cleaning at the end of the rental period, the customer will incur the cleaning charges. Any repairs or lost items will be billed at cost + 20%.
- Any charges not covered by insurance will be re invoiced to the customer
- A 5% Fuel / Insurance surcharge will be added to all invoices

HAZ-MAT RESPONSE, INC.sm

"YOUR FIRST LINE OF DEFENSE"®
Emergency Service Rate Sheet

July 1st, 2003

LABOR

CD#	Title/Position	Standard Rate Per Hour	Over Time Rate Per Hour
EP1	Project Manager/Site Safety Officer	86.00	129.00
EP2	Project Specialist	67.25	100.87
EP3	Project Technician	56.75	85.12
EP4	Project Support Personnel	46.50	69.75
EP5	Senior Project Manager	120.00	180.00
EP6	Corporate Health And Safety	120.00	180.00

EQUIPMENT

CD#	Equipment Description	Rate
	Vehicles	
E01	Haz-Mat Vehicles (SUV, Automobiles)	10.00
E02	Response Vehicle (F-250)	25.00
E03	4 X 4 Truck	14.00
E04	One Ton Truck	18.00
E05	16 Foot Response Truck (R-4 R-33)	85.00
E06	2 ½ Ton Stake bed truck	22.00
E07	Winch Truck	61.00
E08	Boom Truck	72.00
E09	Semi Tractor	50.00
E10	End Dump Trailer with Tractor	75.00
E11	3000 Gallon Vac Truck (4 hr minimum)	135.00
E12	Lowboy Trailer with Tractor	72.00
E13	Roll off Trailer with Tractor	72.00
E14	6 X 4 Gator / Per Day	300.00
E15	10 Wheel Roll off Truck	72.00
E16	Guzzler Dry Vac	175.00
E17	Guzzler Dry Vac w/ Hi-Rail Gear	215.00
	Trailers	
E17	Small Spill Trailer	20.00
E18	Response Trailer (R-1 R-2 R-3 R-5)	71.00
E19	River Response Trailer 10 foot	35.00
E20	River Response Trailer 20 foot	65.00
E21	River Response Trailer 45 foot/ Office / Per Day	300.00
E22	45' Box Trailer / Per Day	100.00
E23	Utility Trailer	15.00
E24	Fuel Trailer	30.50
E25	Tank Cleaning Trailer	55.50
E26	Conex $_R$ Soil Unit	125.00
E27	Air Stripper / Oil Water Separator Trailer	82.00
E29	Office trailer / Per Day	300.00
E30	Decon unit – 4 shower / Per day	350.00
E31	Drum Crusher / Per day	250.00
E32	Oil Water Separator / Per Day	200.00

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CD#	Equipment Description	Rate
	Heavy Equipment	
E35	Uniloader (Case 1845)	40.00
E37	Uniloader With Drum Gripper	55.00
E38	Track Hoe (John Deere 30)	50.00
E39	Rubber Tire Backhoe (Cat 416)	62.00
E40	Rubber Tire Backhoe (Cat 446)	100.00
E41	Excavator (Kobelco 909LC)	145.00
E42	Track Loader (Cat 963)	145.00
E43	Fork Lift	40.50
	Pumps	
E48	¾" Pacer Hand Pump	12.00
E49	¾" Oil / PCB pump	20.00
E50	1 ¼" and Smaller Double Diaphragm Pump	21.00
E51	Wash Down Pump	12.00
E52	2" Dismass Hand Pump	10.00
E53	2" Stainless Steel Double Diaphragm Pump	55.00
E54	2" Aluminum Double Diaphragm	25.00
E55	2" Submersible Pump	15.00
E56	2" Pacer Chemical Pump 5 hp	26.50
E57	2" Trash pump	12.00
E58	3" Aluminum Double Diaphragm	30.00
E59	3" Single Diaphragm Sludge Pump	30.00
E61	3" Trash Pump	17.00
E62	2" Poly Double Diaphragm Pump	55.00
E63	2" Gear Pump	20.00
	Portable Storage	
E66	Up to 1499 Gallon Poly Tank / Per Day	10.00
E67	1500 to 2000 Gallon poly Tank / Per Day	16.00
E69	3000 Gallon Poly Tank / Per Day	18.00
E70	5000 Gallon Poly Tank / Per Day	31.50
E73	21,000 Gallon Frac Tank / Per Day (3 DAY MINIMUM "disposal, and cleaning excluded")	60.00
E74	Open Top Tank/ Per Day	60.00
E75	Non Haz Roll Off Box / Per Day	25.00
E76	Haz Waste Roll Off / Per Day	30.00
E77	Vacuum Box / Per Day	60.00
	Lighting, Generators, Compressors, Pressure Washers	
E80	Portable Generator 5000 Watt	20.00
E83	Portable Light Stand	5.50
E84	Light Tower / Generator	28.00
E85	220 Portable Steam Boiler / Per Day	222.00
E86	3000# PSI Steam/Hot Water Washer	35.50
E89	185 CFM Air Compressor	32.00
E90	Hand Pump Sprayer	10.00

CD#	Equipment Description	Rate
	Vacuum Equipment	
E95	Mercury Vac System	100.00
E96	Nilfisk Decon Unit	60.00
E97	Wet/Dry Elec Hydro Vac System (55 gallon Tornado)	21.00
E98	Wet Dry Vac	15.00
E99	Hepavac System 20 Gallon	45.00
E100	Wet/Dry Air Hyrdo Vac System (55 gallon Tornado)	22.00
	Hand Tools	
E105	Chain Saw	15.00
E106	Concrete Cut Off Saw	20.00
E107	Electric Hand Tools	7.50
E108	Air Hand Tools	7.50
E109	Hand Compactor	9.00
E110	Jack Hammer	12.00
E111	Sandblaster (does not include abrasive)	10.50
E112	Power Broom	15.00
	Specialty Equipment	
E116	Non-Sparking Tool Kit / Per Day	30.00
E117	Chlorine "A" "B" or "C" Kit / Per Day	200.00
E118	Nomex Cover All / Per Person / Per Day	20.00
E119	Plug and Patch Kit / Per Day	55.00
E120	Dome Clamps / Per Day	30.00
E121	Betts Valve/ Per Day	200.00
E122	Ballistic Vest & Helmet / Per Person Per Day	222.00
E123	Model T Jr Foamer	25.00
E124	Bunker Gear / Per Person / Per Day	150.00
E125	Gauge Kit / Per Day	100.00
E126	"Goat" Street sweeper	10.00
	Breathing Air Equipment	
E129	Air Purifying Respirator / Per Day / Per Person	30.00
E130	30 MINUTE SCBA's (Excluding Refills)	25.00
E131	1 HOUR SCBA's (Excluding Refills)	35.00
E132	Cascade Air System / Per Day / Per Person (Excluding Refills) SAR	72.00
E133	Powered Air Purifying Respirator / Per Day / Per Person	55.00
	Monitoring Equipment	
E138	Jerome Mercury Vapor Meter	75.00
E139	PPM Hand Pump	8.00
E140	4 Gas Meter	30.00
E141	3 Gas Meter	20.00
E144	Intrinsically Safe 2-Way Radio	12.00
E145	Intrinsically Safe Air Tools	30.00
E146	PH Meter	5.00
E147	Decimal Meter	12.50
E148	RAD 290 Meter	25.50
E149	PID (Photo Ionization Detector)	30.00
E150	PPM Meter SO_2, H_2S, CO, Etc.	12.00
E151	Metal Detector	7.00
E152	Electric Thermometer	10.00
E153	Non Contact Thermometer	10.00
E154	RAD 493 Meter	23.50
E155	CMS Chip Meter	20.00

CD#	Equipment Description	Rate
	Confined Space Equipment	
E159	Body Harness (Rescue)	8.00
E160	Body Safety Harness	5.50
E161	Confined Entry Air Vent System	15.00
E162	C-S Tripod (Winch System)	50.50
E163	C-S Rescue Equipment Kit (Bag)	50.50
	River Spill Equipment	
E168	Life Vest / per day	5.00
E169	24 Foot Work Boat	40.00
E170	16 Foot Boat With Out Board Motor	26.00
E171	16 Foot Boat	15.00
E172	Oil Skimmer Acme (Small)	10.00
E173	River Boom 12" Fast Water Per Foot / Per Day	2.25
E174	Leaf Blower	15.00
E175	River Boom 18" / Per Foot / Per Day	2.00
E176	Mini Boom / Per Foot / Per Day	1.75
E177	Floats 1 1/2" & 2" / Per day	1.50
E178	Boom Anchor System 25/50# / Per Day	8.00
E179	Boom Tow Bridge / Per day	8.00
E180	Boom Ringer / Recovery Tank	25.00
E181	Oil Skimmer High Capacity	15.00
	Misc.	
E186	Propane Heater	12.50
E187	Portable Heater 85,000 BTU (Plus Fuel)	12.50
E188	Portable Heater 100,000 BTU (Plus Fuel)	15.00
E189	Portable Heater 150,000 BTU (Plus Fuel)	20.00
E190	Portable Heater 320,000 BTU (Plus Fuel)	25.00
E191	Digital Camera / Per Day	25.00
E192	Lap Top Computer	12.00
E193	VHS Video Recorder	12.00
E194	2" Chemical Hose Per Foot per day	1.30
E195	Suction Hose Per Foot per day	1.20
E196	Discharge Hose Per foot per day	1.20
E197	Air Hose ¾" Per Foot per day	.40
E198	Traffic Arrow Board	17.50
E199	Traffic Barricades	4.00
E200	Bag Filter Unit	8.00
E201	4 Pack Bag Filter SS Unit	32.00
E202	6 Pack Bag Filter Unit	48.50
E204	2000 LB High Capacity Activated Carbon Filter (Recharge Fee Will Apply)	75.00
E205	800 LB Activated Carbon Filter (Recharge Fee Will Apply)	48.50
E206	GPS Unit / Per Day	25.00

- All rates are hourly unless noted differently.
- Emergency Response Rates are subject to a 4-hour minimum.
- Overtime will be charged for work performed before 0800 and after 1700hrs and for work over 8 hours in a day, over 40 hours in a week, and weekends.

- Holidays will be charged as double time. New Years Day, Easter Day, Memorial day, 4th of July, Labor day, Thanksgiving Day, Christmas Day
- A per diem of $105.00 per person per day will apply for out of town and overnight stays.
- IDLH & Levels A & B carry a surcharge of $10.00 per person / per hour.
- Mobilization of required heavy equipment will apply as required.
- Any response involving materials that are potential for detonation will reflect a double the stated rate billing.
- Any rented equipment for jobs will be furnished at cost +20%
- Jobs lasting more than 24 hours will be charged at the Emergency Rates for the first 24 hours and then at the Scheduled Rates for hours thereafter (Contract Customers Only).
- Containment boom cleaning and repair will be billed at cost +20%
- Subcontractors will be billed at cost + 20%
- All Emergency Response jobs are billed portal-to-portal.
- Roll off box delivery is dependent on location. The cost of roll off liners is $50.00 each, liners are not mandatory, but if the box requires cleaning at the end of the rental period, the customer will incur the cleaning charges. Any repairs or lost items will be billed at cost + 20%.
- Any charges not covered by insurance will be re invoiced to the customer
- A 5% Fuel / Insurance surcharge will be added to all invoices

Appendix C

APPENDIX C
Environmental Sensitivities

C.1 INTRODUCTION

The purpose of this Plan Appendix is to provide and describe:

- Drainage paths from potential spill sources within the plan area
- Environmentally sensitive areas downstream from drainage paths

C.2 PLAN ORGANIZATION

This Appendix provides a map showing the environmentally sensitive areas in the vicinity of the pipeline and storage field piping. The map also includes "response points" or locations that have been established to work with the topography to stop a release in the event of a discharge.

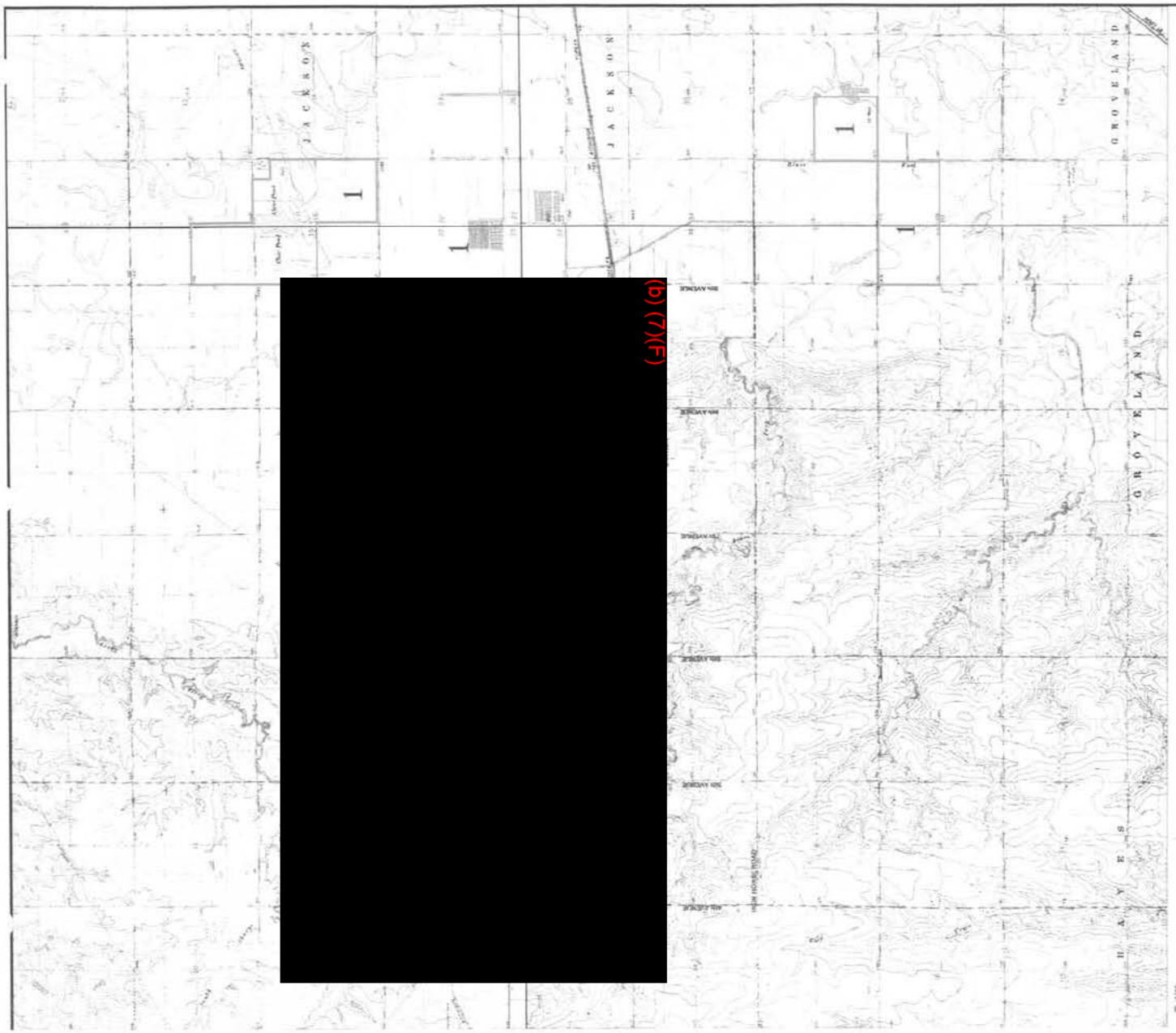
FIGURE C.2-1 - ENDANGERED AND THREATENED SPECIES*
McPherson County, Kansas

COMMON NAME	SCIENTIFIC NAME	GROUP
Crane, Whooping	*Grus americana*	bird
Eagle, Bald	*Hallaeetus leucocephalus*	bird

* As Listed in the ICP.

FIGURE 1 - MAP FEATURE INDEX

MAP ID#	MAP NAME	FEATURE	NAME
1	Environmentally Sensitive Areas	Wetland/ Recreation Area	McPherson Valley Wetlands
2	Environmentally Sensitive Areas	Recreation Area	McPherson Valley Uplands



LEGEND

- 37 — NATURAL GASOLINE/NAPTHA CAVERNS
- FACILITY BOUNDARY
- RESPONSE POINTS
- 1 — McPHERSON VALLEY WETLANDS
- 2 — McPHERSON VALLEY UPLANDS

N

SCALE: 0 — 1/2 — 1 MILE

SOURCE: U.S.G.S. 7.5 MIN. TOPO. QUAD., CONWAY, KANSAS - 1964, PHOTOREVISED 1985 and WINDOM NE, KANSAS - 1965, PHOTOREVISED 1985

Williams

WILLIAMS MIDSTREAM NATURAL GAS LIQUIDS, INC.

TULSA OKLA

FACILITY AND SURROUNDING AREA

INCLUDING DESIGNATED WETLANDS AND "UPLANDS"

MID-CONTINENT FRACTIONATION AND STORAGE, LLC

CONWAY FACILITY

McPHERSON COUNTY, KANSAS

DATE	3/2/07
SCALE	NOTED
DESIGNED BY	RCK
APPROVED BY	CO
DRAWN BY	RCK

DRAWING NUMBER
FIGURE 1 FACILITY LOCATION
FIGURE NUMBER
10

PHMSA 000051191

C.3 UNUSUALLY SENSITIVE AREAS

No Unusually Sensitive Areas which have the potential to be affected by a release from the facility have been identified.

Appendix D

APPENDIX D
HAZARD EVALUATION AND RISK ANALYSIS

D.1 FACILITY HAZARD EVALUATION

The hazards associated with the Facility include a release from the 8-inch pipeline and/or a release from the storage field piping via a line break. Worst case discharge scenarios for each of these hazards are presented in Section D.7.

D.2 VULNERABILITY ANALYSIS

A vulnerability analysis assesses the potential downstream impact of an oil spill on people and the environment.

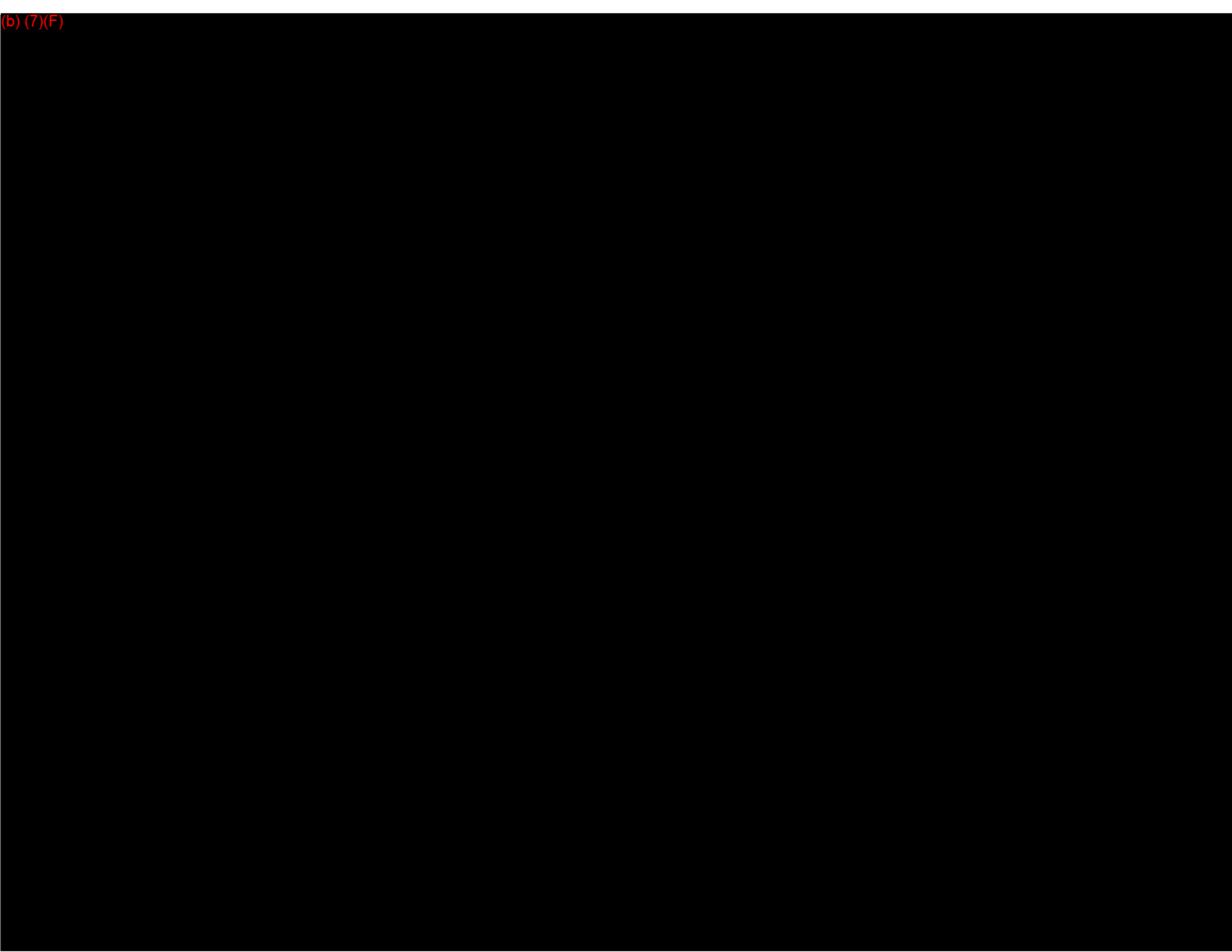
49 CFR 194, Appendix A, requires that the Plan include a map locating the worst case discharge along with each potentially affected water intake, lake, river, and stream within a radius of 5 miles and each potentially affected environmentally sensitive area within a radius of 1 mile.

The closest environmentally sensitive area of concern is the McPherson Valley Wetlands located to the east of the MCFS Conway Underground East (CUE) portion of the Facility. As discussed below, a release near Caverns X-1 and X45-52 would travel north to an unnamed tributary of Blaze Fork and then travel east eventually reaching the McPherson Valley Wetlands; also, a release from Caverns X15-16 at Conway West would travel the same course. However, the distance from the caverns to the wetlands is greater than 1 mile, which is the planning distance listed in 49 CFR 194 for environmentally sensitive areas. It is also anticipated that a response to a spill would prevent oil from reaching the wetlands.

As discussed in Section D.7, the worst case discharge is associated with a release from the storage field piping. The storage field piping is underground; however, assuming that during a release the piping contents would be released to the surface, the discharge would flow in the drainage pathways shown on Figure D.2 below.

The surface drainage pathways for potential releases are as follow:

1. Release near Caverns X15-16: Release would travel east to an Unnamed Tributary to Blaze Fork for 5 miles. There are no water intakes within this 5 mile stretch and the McPherson Valley Wetlands would not be reached within the 1 mile radius.
2. Release near Caverns X34-37: Release would travel south to Blaze Fork for 5 miles. There are no water intakes within this 5 mile stretch.
3. Release near Cavern X1: Release would travel east then north then east to an unnamed tributary of Blaze Fork for 3.6 miles then enter Blaze Fork for the remaining1.4 miles. There are no water intakes within this 5 mile stretch and the McPherson Valley Wetlands would not be reached within the 1 mile radius.
4. Release near Caverns X45-52: Release would travel north then east to an unnamed tributary of Blaze Fork for 3.6 miles then enter Blaze Fork for the remaining1.4 miles. There are no water intakes within this 5 mile stretch and the McPherson Valley Wetlands would not be reached within the 1 mile radius.


(b) (7)(F)

D.3 SPILL DETECTION

Detection

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

- Automated detection by the Supervisory Control and SCADA system
- Visual detection by Company personnel
- Visual detection by the public

(b) (7)(F)

[redacted]

Visual Detection by Company Personnel

Inspections are performed on a regular basis either by Company personnel or aerial patrol flights. The intent of the inspection is to observe the area directly over the pipeline right-of-way for leaks, exposed pipes, washes, missing markers and other unusual conditions. Construction on either side of the pipeline right-of-way is also monitored.

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

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

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

Visual Detection by the Public

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

- Notify the Control Center and the designated office.
- Dispatch Company field personnel to the site to confirm discharge and conduct preliminary assessment
- Notify their immediate supervisor and provide assessment results

Pipeline Shutdown

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

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

D.4 PLANNING DISTANCE CALCULATIONS

N/A

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** and **APPENDIX B**. The following sections are discussions of these scenarios.

D.5.1 Small and Medium Discharge Scenarios

N/A

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 Supervisor/Area Manager and Operations Control Center and notifications would be initiated in accordance with **FIGURE 2-1**.
2. The Supervisor/Area Manager (QI) would assume the role of Incident Commander/Qualified Individual 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 evaluate personnel as needed in accordance with **SECTION 2**.
   - Direct facility responders to shut down ignition sources.
   - Direct facility personnel to deploy containment boom in accordance with **SECTION 2.4**.
   - Complete spill report form in accordance with **SECTION 3** and notify Contract Spill Reporting Company.
   - 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 Spill Management Team. However, for a large spill, the Supervisor/Area Manager would assume the role of Incident Commander and would activate the entire Spill Management Team in accordance with activation procedures described in **SECTION 4.2**.
4. The Incident Commander would then initiate spill assessment procedures including surveillance operations, trajectory calculations, and spill volume estimating in accordance with **SECTION 2.3**.

5. The Incident Commander would then utilize checklists in the Company's ***Emergency Response Plan*** 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 Spill Management Team would develop the following plans, as appropriate (some of these plans may not be required during a small or medium spill):
   - Site Safety and Health
   - Incident Action
   - Disposal
   - Site Security
   - Decontamination
   - Demobilization

   Plan templates are included in **SECTION 5**.
7. The response would continue until an appropriate level of cleanup is obtained.

D.5.3 Description of Factors Effecting Response Efforts

N/A

D.6 PLANNING VOLUME CALCULATIONS

Once the worst case discharge volume has been calculated, response resources must be identified to meet the requirements of 49 CFR 194.105(b). Calculations to determine a worst case discharge amount are described in the next section.

D.7 SPILL VOLUME CALCULATIONS

DOT/PHMSA portion of pipeline/facilities

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

Based on the above, the following volumes are applicable in determining the WCD.

Worst-Case Discharge Determination

(b) (7)(F)

[redacted]

APPENDIX D - HAZARD EVALUATION AND RISK ANALYSIS

(b) (7)(F)

(b) (7)(F)

(b) (7)(F)

[redacted]

2. Historical

Historically, there was a leak from a gasoline line at Conway West that occurred over an unknown period of time and released an unknown quantity. The release has been monitored under a Consent Agreement between MCFS and the Kansas Department of Health and Environment (KDHE) and the benzene residual levels are decreasing. However, since the leak was not quantified, there is not a maximum historic discharge number to compare for worst case discharge.

3. Breakout Tanks

In a letter from the Department of Transportation (DOT) dated June 27, 2006, the DOT states that an inspection of the facility found that the storage field piping was used in the transportation of product. As further stated in the letter, product is taken from the pipeline and stored in the storage field where it is also re-injected into the pipeline for further transportation to another location. In other words, the storage facility is used much like an above-ground break-out tank facility where product is shipped to and from the storage via pipelines.

Based on the DOT interpretation above, a scenario considering a release from the storage field piping has been developed and is included in item number 1 above.

Summary

The worst case discharge is based on the largest volume of the three criteria shown above. (b) (7)(F) [redacted]

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 spill prevention measures listed above are not applicable to the Facility, therefore, the worst case scenario has not been adjusted.

D.8 PIPELINE – ABNORMAL CONDITIONS

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

D.9 PRODUCT CHARACTERISTICS AND HAZARDS

The facilities described in this Plan may handle various types of commodities including but not limited to:

- Gasolines (regular, premium, oxygenated and unoxygenated)
- Diesels
- Natural Gasoline
- Naphtha

The key chemical and physical characteristics of each of these commodities are listed in **FIGURE D.9-1**. The company has other commodities and chemicals located at this facility. MSDS's can be obtained by FAX from the MSDS Hotline (**Figure 3.1-3**). Telephone information concerning the potential hazards can also be obtained from the hotline.

FIGURE D.9-1 - SUMMARY OF COMMODITY CHARACTERISTICS

COMMON NAME	MSDS NAME	HEALTH HAZARD	FLASH POINT	SPECIAL HAZARD	REACTIVITY	HEALTH HAZARD WARNING STATEMENT
Diesel Fuel	Diesel Fuel	0	2	C	0	Long term, repeated exposure may cause skin cancer
Gasoline	Appropriate product name	1	3	C	0	Long term, repeated exposure may cause cancer, blood, kidney and nervous system damage, and contains benzene
Natural Gasoline	Appropriate product name	1	3	C	0	Long term, repeated exposure may cause cancer, blood, kidney and nervous system damage, and contains benzene
Naphtha	Appropriate product name	1	3	N/A	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

APPENDIX E
CROSS REFERENCES

DOT/PHMSA Cross Reference

DOT/PHMSA Cross Reference

OPA 90 REQUIREMENTS (49 CFR 194)	LOCATION
Information Summary	
• For the Core Plan	
o Name and address of operator	Figure 1.3
o 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 descriptions of Response Zones, including county(s) and state(s)	Figure 1.3
• For each Response Zone appendix:	
o Information summary for core plan	Section 1
o QI names and telephone numbers, available on 24-hr basis	Figure 1.3 and 3.1-3, Section 4.5
o Description of Response Zone, including county(s) and state(s) in which a worst case discharge could cause substantial harm to the environment	Section 1
o List of line sections contained in Response Zone, identified by milepost or survey station or other operator designation	Figure 1.3
o Basis for operator's determination of significant and substantial harm	Figure 1.3
o 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 extend 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 operations of pipelines covered by the plan, including applicable state or local requirements	Section 3.0
• 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
• Name of persons (individuals or organizations) to be notified of discharge, indicating whether notification is to be performed by operating personnel or other personnel	Figures 3.1-1 and 3.1-3
• Procedures for notifying Qualified Individuals	Figure 3.1-1 and 4.5-1, Section 4.5
• Primary and secondary communication methods by which notifications can be made	Section 7.1.6

APPENDIX E - CROSS REFERENCES

OPA 90 REQUIREMENTS (49 CFR 194)	LOCATION
• Information to be provided in the initial and each follow-up notification, including the following: o Name of pipeline o Time of discharge o Location of discharge o Name of oil recovered o Reason for discharge (e.g. material failure, excavation damage, corrosion) o Estimated volume of oil discharged o Weather conditions on scene o 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 or 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: o Transfer hoses and pumps o Portable pumps and ancillary equipment o Facilities available to transport and receive oil from a leaking pipeline	Section 7.1.1, Appendix B
• Identification of the availability, location, and contact phone numbers to obtain equipment for response activities on a 24-hour basis	Figure 3.1-3, Appendix B
• Identification of personnel and their location, telephone numbers, and responsibilities for use of equipment in response activities on a 24-hr basis	Figure 3.1-3, Appendix B
Response Activities	
• Responsibilities of, and actions to be taken by, operating personnel to initiate and supervise response actions pending the arrival of the Qualified Individual or other response resources identified in the response plan	Section 2, Section 4.5, Appendix B
• Qualified Individual's responsibilities and authority, including notification of the response resources identified in the response plan	Section 4.5
• Procedures for coordinating the actions of the operator or Qualified Individual with the action of the OSC responsible for monitoring or directing those actions	Sections 4.4 and 4.5
• Oil Spill Removal 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: o Equipment and supplies available o 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

APPENDIX E - CROSS REFERENCES

OPA 90 REQUIREMENTS (49 CFR 194)	LOCATION
List of Contacts	
• List of persons the Plan requires the operator to contact	Figure 3.1-1
• Qualified individuals for the operator's areas of operation	Figures 1-3 and 3.1-3
• Applicable insurance representatives or surveyors for the operator's areas of operation	Figure 3.1-1
• Persons or organizations to notify for activation of response resources	Figure 3.1-1
Training Procedures	
• Description of training procedures and programs of the operations	Appendix A.2
Drill Procedures	
• Announced and unannounced drills	Appendix A.1
• Types of drills and their frequencies; for example: o Manned pipeline emergency procedures and qualified individual notification drills conducted quarterly o Drills involving emergency actions by assigned operating or maintenance personnel and notification of qualified individual on pipeline facilities which are normally unmanned, conducted quarterly o Shore-based spill management team (SMT) tabletop drills conducted yearly o Oil spill removal organization field equipment deployment drills conducted yearly o A drill that exercises entire response plan for each Response Zone, would be conducted at least once every three years	Appendix A.1
Response Plan review and update procedures	
• Procedures to meet §194.121	Section 1.2
• Procedures to review plan after a worst case discharge and to evaluate and record the plan's effectiveness	Section 1.2, Appendix D
Response zone appendices	
Each response zone appendix would provide the following information:	
• Name and telephone number of the qualified individual	Figure 1-3
• Notification procedures	Section 3
• Spill detection and mitigation procedures	Section 2.1, Appendix D
• Name, address, and telephone number of Oil Spill Removal organization	Figure 3.1-3, Appendix B
• Response activities and response resources including: o Equipment and supplies necessary to meet §194.115 o Trained personnel necessary to sustain operation of the equipment and to staff the Oil Spill Removal organization and spill management team for the first seven days of the response	Appendices A and B

APPENDIX E - CROSS REFERENCES

OPA 90 REQUIREMENTS (49 CFR 194)	LOCATION
• Names and telephone numbers of federal, state, and local agencies which the operator expects to assume pollution response responsibilities	Figure 3.1-3
• Worst case discharge volume	Appendix D
• Method used to determine the worst case discharge volume, with calculations	Appendix D
• A map that clearly shows: o Location of worst case discharge o Distance between each line section in the Response Zone: ▪ Each potentially affected public drinking water intake, lake, river, and stream within a radius of five miles of the line section ▪ Each potentially affected environmentally sensitive area within a radius of one mile of the line section	Appendix C
• Piping diagram and plan-profile drawing of each line section; may be kept separate from the response plan if the location is identified	Figure 1-5, Schematics and specific locations on file at facility and via computer in other locations
• For every oil transported by each pipeline in the response zone, emergency response data that: o Include name, description, physical and chemical characteristics, health and safety hazards, and initial spill-handling and firefighting methods o Meet 29 CFR 1910.1200 or 49 CFR 172.602	Appendix D

Appendix F

APPENDIX F
ACRONYMS AND DEFINITIONS

F.1 Acronyms

F.2 Definitions

F.1 ACRONYMS

ACP	-	Area Contingency Plan
AFFF	-	Aqueous Film Forming Foam
ASTM	-	American Society of Testing Materials
BBL	-	Barrel(s)
BLM	-	Bureau of Land Management (USDOI)
BPD	-	Barrels Per Day
BPH	-	Barrels Per Hour
CERCLA	-	Comprehensive Environmental Response, Compensation & Liability Act of 1980, as amended
CFR	-	Code of Federal Regulations
$C0_2$	-	Carbon Dioxide
COTP	-	Captain of the Port (USCG)
CRZ	-	Contamination Reduction Zone
CUE	-	Conway Underground East
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
ICP	-	Integrated Contingency Plan
ICS	-	Incident Command System

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JIC	-	Joint Information Center
LEL	-	Lower Explosive Limit
LEPC	-	Local Emergency Planning Committee
LEPD	-	Local Emergency Planning District
LNG	-	Liquid Natural Gas
LPG	-	Liquefied Petroleum Gas
MSDS	-	Material Safety Data Sheets
MTR	-	Marine Transportation Related
N/A	-	Not Applicable
NCP	-	National Oil and Hazardous Substances Pollution Contingency Plan
NIIMS	-	National Interagency Incident Management System
NM	-	Nautical Miles
NOAA	-	National Oceanic and Atmospheric Administration
NRC	-	National Response Center
NRDA	-	National Resource Damage Assessment
NRT	-	National Response Team
OBA	-	Oxygen Breathing Apparatus
OPA 90	-	Oil Pollution Act of 1990
OSC	-	On-Scene Coordinator/Commander
OSHA	-	Occupational Safety and Health Administration (USDL)
PPE	-	Personal Protective Equipment
PHMSA	-	Pipeline and Hazardous Material Safety Administration (DOT)
PREP	-	(National) Preparedness for Response Exercise Program
QI	-	Qualified Individual
RCRA	-	Resource Conservation and Recovery Act of 1976
RQ	-	Reportable Quantity
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)
SMT	-	Spill Management Team
SOSC	-	State On-Scene Coordinator
SPCC	-	Spill Prevention Control and Countermeasures (Plan)

SSC	-	Scientific Support Coordinator (NOAA)
UCS	-	Unified Command System
UEL	-	Upper Explosive Limit
USACOE	-	U. S. Army Corps of Engineers
USCG	-	U. S. Coast Guard
USDOD	-	U. S. Department of Defense
USDL	-	U. S. Department of Labor
USDOE	-	U. S. Department of Energy
USDOI	-	U. S. Department of the Interior
USDOJ	-	U. S. Department of Justice
USDOT	-	U. S. Department of Transportation
USFWS	-	U. S. Fish and Wildlife Service (USDOI)
USGS	-	U. S. Geological Survey (USDOI)

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."

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

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

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

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

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

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

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

Command Post
A site located at a safe distance from the spill site where response decisions are made, equipment and manpower deployed, and communications handled. The Incident Commander and the On-Scene Coordinators may direct the on-scene response from this location.

Communication Equipment
Equipment that will be utilized during response operations to maintain communication between employees, contractors, federal/state/local agencies.

Containment Boom
A flotation/freeboard device, made with a skirt/curtain, longitudinal strength member, and ballast unit/weight designed to entrap and contain the product for recovery.

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

Contingency Plan
A document used by: (1) federal, state, and local agencies to guide planning and response procedures regarding spill of oil, hazardous substances, or other emergencies; (2) a document used by industry as a response plan to spills of oil, hazardous substances, or other emergencies occurring upon their vessels or at their facilities.

Contract or Other Approved Means
Includes:

- A written contractual agreement with a response contractor. The agreement should identify and ensure the availability of the specified personnel and equipment described under U.S.C.G. Regulations within stipulated response times in the specified geographic areas
- Certification by the facility owner or operator that the specified personnel and equipment described under USCG Regulations are owned, operated, or under the direct control of the facility owner or operator, and are available within stipulated times in the specified geographic areas
- Active membership in a local or regional oil spill removal organization that has identified specified personnel and equipment described under USCG Regulations that are available to respond to a discharge within stipulated times in the specified geographic areas

- A document which:
  - Identifies the personnel, equipment, services, capable of being provided by the response contractor within stipulated response times in specified geographic areas
  - Sets out the parties' acknowledgment that the response contractor intends to commit the resources in the event of a response
  - Permits the Coast Guard to verify the availability of the response resources identified through tests, inspections, drills
  - Is incorporated by reference in the Response Plan
- For a facility that could reasonably be expected to cause substantial harm to the environment, with the consent of the response contractor or oil spill removal organization, the identification of a response contractor or oil spill removal organization with specified equipment and personnel which are available within stipulated response times in specific geographic areas.

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

Dispersants
Those chemical agents that emulsify, disperse, or 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 CPA.

First Responders. First Response Agency
A public health or safety agency (i.e., fire service or police department) charged with responding to a spill during the emergency phase and alleviating immediate danger to human life, health, safety, or property.

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

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

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

Hazardous Material
Any nonradioactive solid, liquid, or gaseous substance which, when uncontrolled, may be harmful to humans, animals, or the environment. Including but not limited to substances otherwise defined as hazardous wastes, dangerous wastes, extremely hazardous wastes, oil, or pollutants.

Hazardous Substance
Any substance designed as such by the Administrator of EPA pursuant to the Comprehensive Environmental Response, Compensation, and Liability Act; regulated pursuant to Section 311 of the Federal Water Pollution Control Act.

Hazardous Waste
Any solid waste identified or listed as a hazardous waste by the Administrator of the EPA pursuant to the federal Solid Waste Disposal Act, as amended by the Resources Conservation and Recovery Act (RCRA), 42 U.S.C., Section 6901, et sag 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.

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 clean-up capability to conduct response activities for a worst case discharge from a facility in adverse weather.

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.

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

Owner or Operator
Any person, individual, partnership, corporation, association, governmental unit, or public or private organization of any character.

Persistent Oil
A petroleum-based oil that does not meet the distillation criteria for a non-persistent oil. For the purposes of this Appendix, persistent oils are further classified based on specific gravity as follows:

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

Primary Response Contractor(s)
An individual, company, or cooperative that has contracted directly with the plan holder to provide equipment and/or personnel for the containment or cleanup of spilled oil.

Qualified Individual(s)
An English-speaking representative (s) of the facility identified in the plan, located in the United States, available on a 24-hour basis, familiar with implementation of the facility response plan, and trained in his or her responsibilities under the plan. This person must have full written authority to implement the facility's response plan. This includes:

- Activating and engaging in contracting with identified oil spill removal organization(s)
- Acting as a liaison with the predesignated of Federal On-Scene Coordinator (FOCS)
- Obligating, either directly or through prearranged contracts, funds required to carry out all necessary or directed response activities

Regional Response Team
The Federal Response Organization (consisting of representatives from selected Federal and State agencies) which acts as a regional body responsible for planning and preparedness before an oil spill occurs and providing advice to the FOSC in the event of a major or substantial spill.

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

Responsible Party
Any person, owner/operator, or facility that has control over an oil or hazardous substance immediately before entry of the oil or hazardous substance into the atmosphere or in or upon the water, surface, or subsurface land of the state.

Rivers and Canals
A body of water confined within the inland area that has a projected depth of 12 feet or less, including the Intracoastal Waterway and other waterways artificially created for navigation.

Skimmers
Mechanical devices used to skim the surface of the water and recover floating oil. Skimmers fall into four basic categories (suction heads, floating weirs, oleophilic surface units, and hydrodynamic devices) which vary in efficiency depending on the type of oil and size of spill.

Stopover
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.

Spill Management Team (SMT)
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.

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.